

# Planning Report and Statements of Consistency

*In respect of*

**Proposed Strategic Housing Development on Lands at  
Newcastle South,  
Newcastle, Co. Dublin**

*Prepared for*

***Cairn Homes Properties Ltd.***

*Prepared by*

**John Spain Associates**

**June 2022**



39 Fitzwilliam Place, Dublin 2  
Telephone: (01) 662 5803  
E-mail [info@johnspainassociates.com](mailto:info@johnspainassociates.com)

## TABLE OF CONTENTS

1.0 INTRODUCTION .....1

2.0 SITE LOCATION AND DEVELOPMENT DESCRIPTION.....1

3.0 PLANNING HISTORY .....12

4.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY .....14

5.0 CONSISTENCY WITH SECTION 28 GUIDELINES .....17

6.0 CONSISTENCY WITH SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2016 – 2022 ....55

7.0 CONSISTENCY WITH NEWCASTLE LOCAL AREA PLAN 2012 (AS EXTENDED).....64

8.0 PART V.....75

9.0 RECOMMENDED PLANNING CONDITIONS .....76

10.0 CONCLUSIONS .....76

## LIST OF FIGURES

Figure 2.1 – Subject Lands.....1

Figure 2.2 – Site Location.....2

Figure 2.3 – Site Layout .....3

Figure 2.4 – Greenway .....3

Figure 2.5 – Apartment Building A within Burgage Plot .....4

Figure 2.6 – Apartment Building B within Burgage Plot .....4

Figure 2.7 – Apartment Buildings within Burgage Plot.....4

Figure 2.8 – Duplex Units .....5

Figure 2.9 – Duplex Units Layout .....5

Figure 2.10 – Creche.....5

Figure 2.11 – Creche Layout .....5

Figure 2.12 – Sean Feirm Character Area .....6

Figure 2.13 – Taobh Chnoic Character Area .....7

Figure 2.13 – Character Area Burgage South.....7

Figure 2.14 – Sean Feirm Park .....8

Figure 2.15 – Proposed Site Access Locations.....9

Figure 4.1 – Proposed Site Access Locations Bus Connects .....16

Figure 5.2 – Materials .....23

Figure 5.2 – Linkages .....27

Figure 6.1 – Eastern Portion of Taobh Chonaic Park .....31

Figure 6.2 – Graydon Development with Open Space Areas .....32

Figure 6.3 – Land Ownership – Burgage Park South .....32

Figure 6.4 – Site Reserved for Primary School .....33

Figure 6.5 – Land Use Zoning Map (South Dublin Draft County Development Plan).....34

Figure 6.2 – The Plan Approach – Eight Key Principles .....53

Figure 7.1 - South Dublin RPG Housing Allocation/Estimated CSO Requirement .....55

Figure 7.2– South Dublin Housing Required to Meet Growth Scenario.....55

Figure 7.3 – Land Use Zoning Map (South Dublin County Development Plan).....55

Figure 8.1: Map of Newcastle Local Area Plan 2012 (as extended) showing the division of plan lands into neighbourhoods .....69

Figure 8.2: Overall Development Summary of Neighbourhoods, Newcastle LAP 2012 (as extended) .....69

Figure 8.3: Sean Feirm – Local Framework and Indicative Layout, Newcastle .....70

Figure 8.4: Burgage South – Local Framework and Indicative Layout, Newcastle LAP 2012 (as extended) .....71

Figure 8.5: Taobh Chnoic – Local Framework and Indicative Layout, Newcastle LAP 2012 (as extended) .....72

Figure 8.6: Map from Newcastle Local Area Plan 2012 (as extended) showing Softened Settlement Edge lands, incl. annotation showing subject site in blue.....73

## LIST OF TABLES

Table 2.1 – Summary of Key Site Statistics ..... 1

Table 2.1 – Overall Mix of Units ..... 3

Table 2.3 – Proposed Car Parking provision ..... 9

Table 2.4 – Proposed Cycle Parking provision ..... 10

Table 5.1 – Overall Apartments Mix ..... 20

Table 5.2 - Compliance with SPPR3..... 20

Table 5.3 – Communal Open Space Requirement ..... 21

Table 5.4 – Combined no. of Units – Creche provision ..... 28

Table 6.1 – Consistency with Core Strategy ..... 30

Table 6.2 – Consistency with Relevant Policies for Natural, Cultural and Built Heritage ..... 35

Table 6.3 – Consistency with Relevant Policies for Green Infrastructure..... 36

Table 6.4 – Consistency with Relevant Policies for Quality Design and Healthy Place-making ..... 38

Table 6.5 – Consistency with Relevant Policies for Housing Strategy ..... 40

Table 6.6 – Consistency with Relevant Policies for Sustainable Movement ..... 42

Table 6.7 – Consistency with Relevant Policies for Natural, Cultural and Built Community Infrastructure and Public Open Space ..... 43

Table 6.8 – Consistency with Relevant Policies for Energy..... 45

Table 6.9 – Consistency with Relevant Policies for Infrastructure ..... 46

Table 6.9 – Consistency with Relevant Development Management Standards ..... 47

Table 7.1 – Consistency with Relevant Policies for Core Strategy ..... 56

Table 7.2 – Consistency with Relevant Policies for Housing ..... 56

Table 7.3 Consistency with Relevant Policies for Community Policies ..... 57

Table 7.4 Consistency with Relevant Policies for Building Heights in Urban Centres ..... 58

Table 7.5 – Consistency with Relevant Policies for Transport and Mobility Objectives ..... 58

Table 7.6 – Consistency with Relevant Policies for Infrastructure and Environmental Quality ..... 59

Table 7.7 – Consistency with Relevant Policies for Natural Heritage Objectives..... 60

Table 7.8 – Consistency with Relevant Policies for Built Heritage And Architectural Conservation ..... 60

Table 7.9 – Consistency with Relevant Policies Energy ..... 61

Table 8.1: Consistency with relevant LAP policies for Green Infrastructure..... 64

Table 8.2: Consistency with relevant LAP policies for Water and Water Management (including SUDS) ..... 64

Table 8.3: Consistency with relevant LAP policies for Built Heritage and Natural Heritage ..... 65

Table 8.4: Consistency with relevant LAP policies for Accessibility and Movement Strategy ..... 66

Table 8.5: Consistency with relevant LAP policies for Land Use and Density Strategy ..... 67

Table 8.6 – Consistency with relevant LAP policies for Built Form..... 68

Table 8.7: Consistency with relevant LAP policies for Sean Feirm ..... 69

Table 8.8: Consistency with relevant LAP policies for Burgage South ..... 70

Table 8.9: Consistency with relevant LAP policies for Taobh Chnoic ..... 72

Table 8.10 – LAP Development Standards..... 74

Table 8.11: LAP Phasing ..... 74

## DOCUMENT CONTROL SHEET

<b>Client:</b>	Cairn Homes Properties Ltd.
<b>Project Title:</b>	Newcastle South SHD
<b>Document Title:</b>	Planning Report and Statement of Consistency

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
DV1	DV1	LM	RK	RK	8-6-2022
F01	F01	RK	JS	RK	16-6-2022

**1.0 INTRODUCTION**

- 1.1 On behalf of the applicant, Cairn Homes Properties Ltd., this Statement of Consistency with Planning Policy has been prepared to accompany this SHD application to An Bord Pleanála in relation to a proposed strategic housing development at Newcastle South, Newcastle, Co. Dublin on a site of c. 8.47 hectares.
- 1.2 In summary, the proposed development comprises 280 no. residential units consisting of 128 no. 2-storey semi-detached and terraced houses providing 2, 3 4 and 5 bed units, 18 no. 3-bed duplex units over 18 no. ground floor 2-bed apartments in 3 separate no. 3-storey blocks and 116 no. apartments (1, 2 and 3 bed units) provided within 2 no. 5-storey buildings, all associated site work, access, infrastructure, car parking, open space a creche and boundary treatments.
- 1.3 This consistency statement, prepared by John Spain Associates, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy.
- 1.4 This SHD application is accompanied by a comprehensive range of documentation which specifically seeks to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017, and items raised by the Planning Authority during pre-application discussions and the relevant sections of the South Dublin County Development Plan 2016-2022, the Draft South Dublin County Development Plan and the Newcastle LAP 2012, which is due to expire on the 7<sup>th</sup> of December 2022.

**2.0 SITE LOCATION AND DEVELOPMENT DESCRIPTION**

**2.1 Site Description**

- 2.1 The proposed development site is located in the administrative area of South Dublin County Council. The lands are situated within the development boundary of Newcastle as identified in the Newcastle Local Area Plan 2012 extended to 2022 (LAP). The proposed development site is situated in the townland of Newcastle South.
- 2.2 The proposed development site is situated to the south of Main Street, Newcastle. Main Street is formed by the R120 which links the M4 Motorway at Lucan with the N7 National Primary Route at Rathcoole Interchange. The R405 joins the R120 on the Main Street. The R405 links the M4 Motorway via Celbridge and Hazelhatch Rail Station to the N7 at Rathcoole.
- 2.3 The indicative location of the subject site is outlined in red below, with the neighbouring SHD lands (Graydon - under construction) and other lands under the control of the applicant in blue.
- 2.4 Newcastle is a small village situated 20km south of Dublin City Centre. The village supports a range of commercial and social facilities including a church; a national school; a range of local village shops; a pharmacy, and a medical centre along the Main Street. Located opposite Newcastle Manor is a Texaco Service Station which accommodates a post office and convenience store. The Greenogue Industrial Estate and Aerodrome Business Park are located just beyond the village to the east.
- 2.5 The Site Layout Plan (figure 2.3) prepared by MOLA Architects shows the overall layout in context.

**Figure 2.1 – Subject Lands**



Source: Google Maps

**2.2 Description of the Location of the Proposed Development**

- 2.6 In summary, the proposed development comprises 280 no. residential units consisting of 128 no. 2-storey semi-detached and terraced houses providing 2, 3 4 and 5 bed units, 18 no. 3-bed duplex units over 18 no. ground floor 2-bed apartments in 3 separate no. 3-storey blocks and 116 no. apartments (1, 2 and 3 bed units) provided within 2 no. 5-storey buildings, all associated site work, access, infrastructure, car parking, open space and boundary treatments.

**Table 2.1 – Summary of Key Site Statistics**

Site Area	8.47 ha. Gross (including road works and creche site c. 0.07 ha) 7.55 ha. net (residential development)
Land Use Zoning	Objective RES-N' - 'To provide for new residential communities in accordance with approved area plans' 'Objective RU' 'To protect and improve rural amenity and to provide for the development of agriculture.'
No. of Dwellings	280 dwellings (128 no. houses & 152 no. duplex apartments/apartments) 8 no. 2 bedroom houses 94 no. 3 bedroom houses 25 no. 4 bedroom houses and 1 no. 5 bedroom house 116 no. apartments 54 no. 1 bedroom apartments & 62 no. 2 bedroom apartments

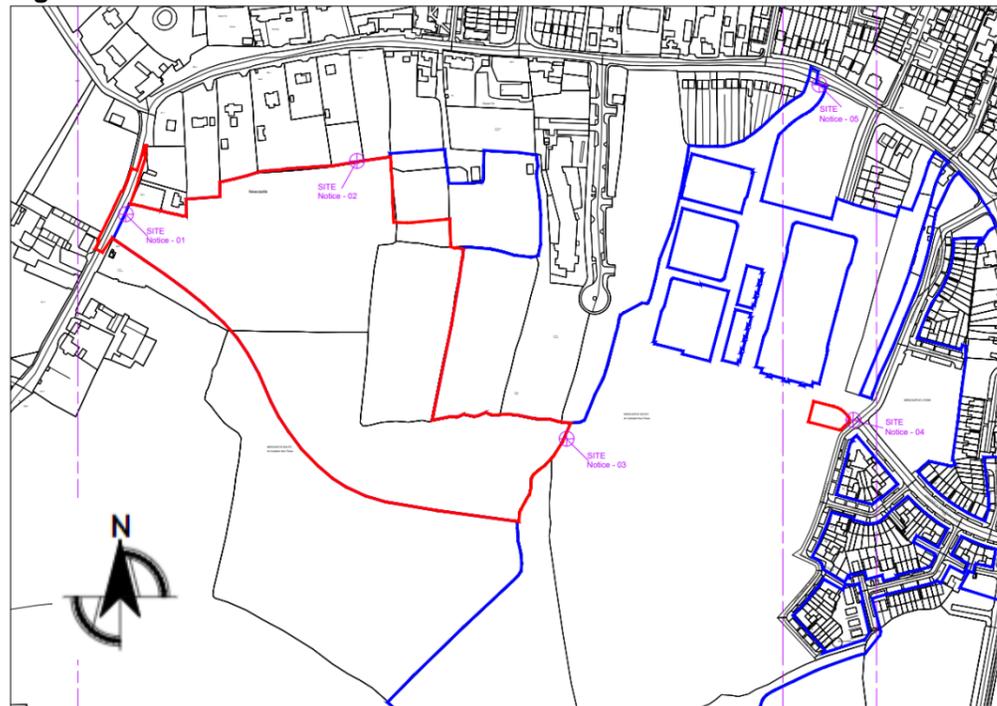
	36 no. apartments/duplex apartments (18 no. 2 bedroom apartments and 18 no. 3 bedroom duplex apartments)
Density	33.1 units per hectare Gross (37.1 units per hectare net)
Creche	778 sq. m
Open Space	1.98 ha. of open space comprising: 1.71 ha. public open space 0.27 ha communal open space
Building Heights	2, 3 and 5 storeys
Dual Aspect	50%
Plot Ratio	1:0.34 (Gross) 1:0.38 (Net)
Car Parking	423 (251 no. for houses, 172 no. for apartments/duplexes & 13 no. permitted from Graydon SHD for the creche)
Bicycle Parking	370 no. cycle spaces (252 no. long stay secured & 112 no. short stay & 6 no. for creche).
EV spaces & Car Share	38 no. EV and 5 no. car share
Vehicular Access	Athgoe Road, Graydon to the East and to the northern boundary (St. Finian's Way)
Part V	28 units

**2.4 Residential Development**

2.8 The development will consist of the construction of 280 no. dwellings, a creche, and open space at this site within the townland of Newcastle South, Newcastle, Co. Dublin, on lands of c. 8.47 hectares (2 no. sites comprising main development site (8.4 ha.) and site relating to creche c. 0.07 ha. in 'Graydon' as follows:

- A) 128 no. 2 storey houses (8 no. 2 bedroom houses, 94 no. 3 bedroom houses, 25 no. 4 bedroom houses and 1 no. 5 bedroom house;
- B) 116 no. apartments in 2 no. 5 storey buildings comprising (54 no. 1 bedroom apartments & 62 no. 2 bedroom apartments, all with terrace or balcony along with solar panels and green roofs at roof level as well as telecommunications infrastructure comprising 9 no. support poles on ballast mounts (to accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each) & 3 no. poles on lift overrun (to accommodate 2No. Ø0.3m Microwave links each at roof level of Apartment building B, together with associated equipment and cabinets/shrouds);
- C) 36 no. apartments/duplex apartments in 3 no. 3 storey buildings – (18 no. 2 bedroom apartments and 18 no. 3 bedroom duplex apartments) all with terrace;
- D) Amendment to permitted Creche (c. 518sqm) in 'Graydon' (ABP References: TA06S.305343 & ABP-305343-19) to now provide a Creche of c. 778 sq. m of 2 no. storeys;
- E) Open space, hard and soft landscaping (including public lighting & boundary treatment), communal open space for duplex apartments and apartments; along with single storey bicycle/bin stores and ESB substations;
- F) Vehicular access from the Athgoe Road from a new signalised junction along with upgrades to footpath and pedestrian crossing as well as provision of vehicular/pedestrian/cycle link to permitted 'Graydon' (TA06S.305343) 'Newcastle Boulevard' to the east, as well as 423 no. car parking spaces and 370 no. bicycle spaces and all internal roads, cycleways, green routes and paths;
- G) Provision of Surface water attenuation measures and underground attenuation systems, connection to water supply, and provision of foul drainage infrastructure as well as underground local pumping station to Irish Water specifications and all ancillary site development/construction/landscaping works.

**Figure 2.2 – Site Location**



Source: Mola Architects

**2.3 Demolition**

2.7 There is no demolition of habitable or any other structures relating to the proposed development.

**Figure 2.3 – Site Layout**



Source: Mola Architects

- 2.9 The houses are located in the western portion of the lands, while the 2 no. apartment buildings are located centrally within the site. The duplex units are located in the southern part of the site.
- 2.10 The overall mix of apartments within the proposed scheme is noted as follows:

**Table 2.2 – Overall Mix of Units**

	1 bed	2 bed	3 bed	4 bed	5 bed	Overall
Houses		8	94	25	1	128
Apartments	54	62				116
Duplex Apartments		18	18			36
Total	54	88	112	25	1	280
Overall Mix %	19.2%	31.4%	40%	8.9%	0.3%	

Source: Mola Architects

- 2.11 The proposal will include significant areas of open space and landscaping which will include a combination of pocket parks, neighbourhood park and interlinked shared surfaces which will enhance pedestrian movement and permeability. The primary point of access is proposed from the 'Athgoe' roadway, which connects the R405 and L6001, at the site's western perimeter. A secondary access is also proposed to connect with the permitted development to the adjoining lands of Graydon to the east and south-east boundaries.

**2.5 Houses**

- 2.12 The 128 no. houses are designed as two storey family dwellings, in a wide mix of units comprising 8 no. 2 bedroom houses, 94 no. 3 bedroom houses, 25 no. 4 bedroom houses and 1 no. 5 bedroom unit in semi-detached or terraced configurations. Individual plot layouts provide good separation to ensure privacy and minimise overlooking. The end-row and end terrace house types have been used to turn corners, with front doors and windows giving activity and passive supervision to the sides and avoiding large blank gables. All houses are 2 no. storeys with private amenity space in the form of a rear garden. Dwellings are provided as a combined of semi-detached and terraced units. Individual plot layouts provide good separation to ensure privacy and minimise overlooking both within the proposed development and to the north at St. Finian's Way.
- 2.13 The variety of house types provides for a wide choice to suit all potential occupiers and many household types, as well as permitting a very efficient site layout. The mix of house type in the street frontage creates visual interest and contribute to the specific character of the development, both overall and in each street. The overall provision of 10 no. house types adds positively to the variety for potential occupiers and contributes to a development which provides high quality family homes in a legible and efficient layout which is easily navigable.

**2.6 Apartment Buildings**

- 2.14 The apartments will be located in 2 no. centrally located apartment buildings of 5 storeys in height and are located within the Burgage Plot.

**Figure 2.4 – Greenway**



**2.6.1 Block A**

2.15 Block A is 5 storeys and comprises 58 no. apartments consisting of 27 no. 1 bedroom apartments & 31 no. 2 bedroom apartments and is located within the southern portion of the Burgage Plot.

**Figure 2.5 – Apartment Building A within Burgage Plot**



2.16 Extensive areas of open space are provided within the Burgage Plot area comprising c. 0.5 hectares along with additional communal open space of c. 1,627 sq. m

**2.6.2 Block B**

2.17 Block B is 5 storeys and comprises 58 no. apartments consisting of 27 no. 1 bedroom apartments & 31 no. 2 bedroom apartments.

**Figure 2.6 – Apartment Building B within Burgage Plot**



**Figure 2.7 – Apartment Buildings within Burgage Plot**



**2.7 Duplex Units**

2.18 It is proposed to provide 36 no. duplex units (18 no. 2 bed and 18 no. 3 bed ground floor duplex apartments) contained in 3 no. separate 3 storey duplex buildings located within the south east portion of the scheme. Communal open space with a southerly aspect of c. 1,063 sq. m is provided.

**Figure 2.8 – Duplex Units**



2.19 The three storey duplex blocks provide a focal point at the eastern entrance point to the scheme from the adjacent Graydon development. They also continue the transition between the adjacent Graydon development and the subject lands. The Duplex Blocks will be a combination of Brick and self-coloured render.

**Figure 2.9 – Duplex Units Layout**



**2.8 Creche**

The Creche that forms part of this application is an amendment to the permitted Creche (c. 518sqm) in 'Graydon' (ABP References: TA06S.305343 & ABP305343-19) to now provide a 2 no. storey Creche of c. 778 sq. m. The parking is as per previously permitted, with some additional cycle spaces (6 no.) provided.

**Figure 2.10 – Creche**



**Figure 2.11 – Creche Layout**



**2.9 Character Areas**

**2.9.1 Character Area - Neighbourhood 1 - Sean Feirm**

2.20 The Sean Feirm Neighbourhood is a mix of 2 storey Detached, Semi detached and some terraced housing providing 73 units on a site of C.3.4Ha.

2.21 The area of this Neighbourhood has a gentle east to west cross fall of approximately 1 to 2m and so is generally flat to gently sloping. The northern boundary of this neighbourhood backs onto the existing large detached houses that front onto the Main street and also the recently completed 2 storey terraced development, at St. Finian’s Way. The Sean Feirm neighbourhood forms the main access off the Athgoe road and connects the main boulevard that runs through the development to the eastern boundary connection with Graydon and Ballynakelly.

**Figure 2.12 – Sean Feirm Character Area**



2.22 The Sean Feirm neighbourhood forms the main access off the Athgoe road and connects the main boulevard that runs through the development to the eastern boundary connection with Graydon and Ballynakelly. The mix of house type proposed are:

- 4 bed detached unit;
- 4 bed semi detached units
- 3 bed semi detached units
- 3 bed terraced units.

2.23 The detached and semi detached houses have been located mainly to the western part of this neighbourhood providing a lower density scheme as you enter from the west. This provides the

main character of this neighbourhood and an appropriate transition from the rural hinterland as set out in the LAP (Objective SF1 and SF8)

2.24 Two parks have been provided, Towerhouse park, a small pocket park acting as a gateway feature at the Athgoe entrance, while also providing an appropriate setting and green buffer to the upstanding Towerhouse located further south along Athgoe road. This also facilitates any future walking and cycling trails that would incorporate Towerhouse. As well as the pocket park a more formal park (Sean Feirm Park) has been provided as set out in the LAP.

2.25 A tree lined boulevard is proposed to run from the Athgoe road entrance, connecting the Tower house park with the Sean Feirm park and then on through the development linking up with the continuation of the existing Newcastle Boulevard through the adjoining Graydon development to the east. (Objective SF 3) The sustainable management of water including the small retention pond to the west will be carried out through a network of SUDS forming parkland features, linking the parks and green links though out the scheme. (Objective SF3 and SF4)

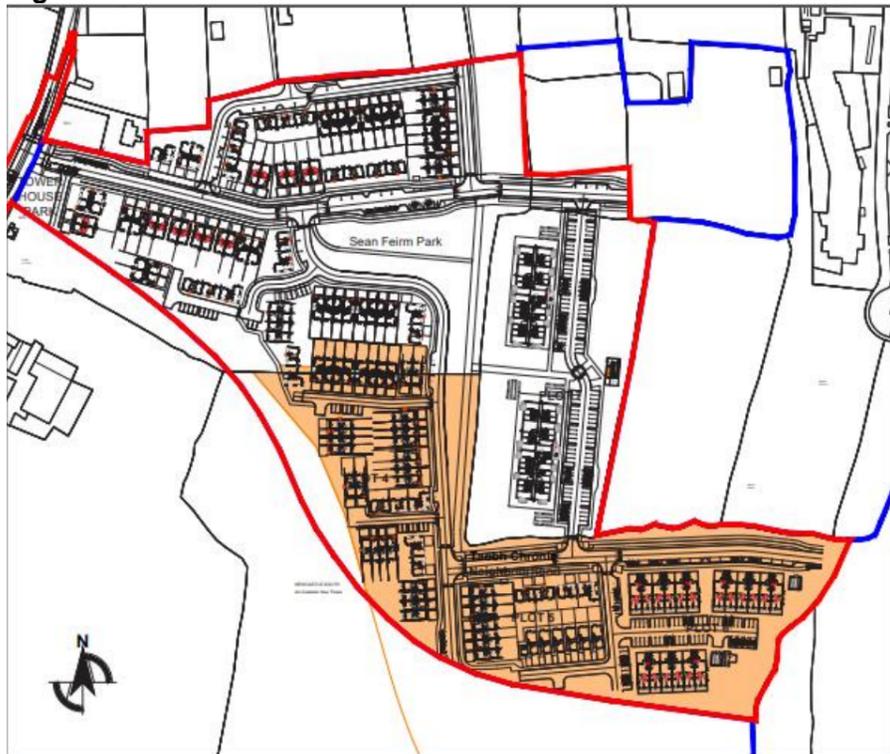
2.26 Frontages of houses are to be of a Brick finish to the ground floor with a soldier course detail and self rendered finish to the first floor. The colour of brick used will further differentiate this neighbourhood from the other areas. The ground floor windows to the front facades will also have a selected reconstituted stone surround detail providing a more historical feature. Rear and gable walls where they do not front onto the street and form the entrance to the house will be a self coloured render finish.

2.27 A combination of home zones and smaller streets off the main Link Street/boulevard enhances the lower density character of this residential neighbourhood. (Objective SF7) A mix of on curtilage and on street parking is provided in accordance with DMURS best practice to provide some passive traffic calming. This parking allocation is broken up and softened by street tree planting and soft landscaping providing defensible space to the residential housing.

**2.9.2 Character Area - Neighbourhood 5 - Taobh Chnoic**

2.28 The Taobh Chnoic Neighbourhood is a mix of 2 storey Detached, Semi detached and terraced housing along with 3 No three storey Duplex blocks, providing a total of 91 units on a site of C.3.1Ha.

**Figure 2.13 – Taobh Chnoic Character Area**



2.29 The detached, semi detached and terraced houses of this neighbour hood continue the transition between the village and rural hinterlands along the southern boundary.

**2.9.3 Character Area - Neighbourhood 4 - Burgage South**

2.30 The area within our proposed development is in the Burgage South Neighbourhood and forms part of the Village expansion area. The Burgage South Neighbourhood is located on lands that are permeated by the historic burgage plot hedgerows. It is a requirement of the LAP that this neighbourhood should be developed around and within the burgage plot patterns. The effect of reducing the footprint of development in this part of the site has allowed for larger areas of landscaping and public open spaces that incorporate and protect the historic burgage hedgerows. This landscaped approach enhances the public realm within the plot and surrounding areas

2.31 This design rational has allowed for the future protection of these Burgage hedgerows by keeping them within in public and managed areas and reducing the need to remove sections of the hedgerow. Pedestrian and cycle paths form part of the proposal for this neighbourhood providing accessible links to other parts of the scheme. The Hedgerows will also be incorporated in to the SUDS network and form the boundaries to the parks and open spaces

**Figure 2.14 – Character Area Burgage South**



**2.10 Landscaping Strategy**

**2.10.1 Design Approach & Open Space Planning Context**

2.32 The design intent is to create a high quality and appropriate landscape for future residents, which will meet their recreational needs and provide an attractive visual setting and associated social amenity spaces. The principles of inclusivity for all age groups, universal accessibility and sustainable development are applied to ensure an inclusive and environmentally responsible design solution. The objective of the landscape strategy for the proposed development is not simply to apply greenery to open areas but to place the new residential and community facilities within a cohesive landscape that responds to and integrates the proposed development within the site. The landscape developments that are proposed are in accordance with the relevant Green Infrastructure policies of the South Dublin County Council Development Plan 2016 – 2022, Draft South Dublin County Development Plan 2022-2028 and the Newcastle Local Area Plan 2012.

POS (A) - Tower Park	472	
POS (B) - Sean Feirm Park	3427	
POS (C) - North South Green Link	2884	
POS (D) - Northern Space	1460	
POS (E) - adjacent to Apts (total)	5110	
POS (F) - To western boundary with LAP	3744	
<b>Total</b>	<b>17097</b>	<b>22.2%</b>
Amenity Area - Apartments	1627	
Amenity Area - Duplex Blocks	1063	
<b>Total</b>	<b>2690</b>	

2.33 The Local Area Plan seeks to create a permeable network of green infrastructure and open spaces across the LAP lands. This allows for the creation of a series of local parks within easy walking distance of future residents, along with a larger village park area (Taobh Chnoic Park) a significant portion of which is to be delivered as part of the Graydon development, to the south of the lands. Each of the smaller open spaces will cater for active and passive needs while the Taobh Chnoic Park will cater for more formal play activities, with the inclusion of a senior size playing pitch, a multi-use games area and a playground catering for a large range of age groups.

2.34 These open spaces are linked with a Greenway pedestrian/ cycle network. This network links existing developed areas to the east to the centre of Newcastle to the north through the new development and continues out to the existing roadway on the western side of Newcastle. The proposed greenway incorporates existing hedgerows where feasible and is separated from the proposed roadway system as much as possible.

**2.10.2 Burgage Plots**

2.35 As set out in the Murray Associates Landscape Report, overarching this permeable pedestrian-focused network is the existing burgage plot and hedgerow system. The LAP sets out to retain, incorporate and reinstate the existing burgage plot boundaries associated with Newcastle. Within the proposed development the creation of successful streets and urban configurations has been carefully balanced with the need to retain the burgage character of the landscape. A study of existing and proposed hedge typology has been undertaken, which, along with recommendations from the LAP, and has formed the basis of a system of retention and reinstatement of plot boundaries and hedgerows.

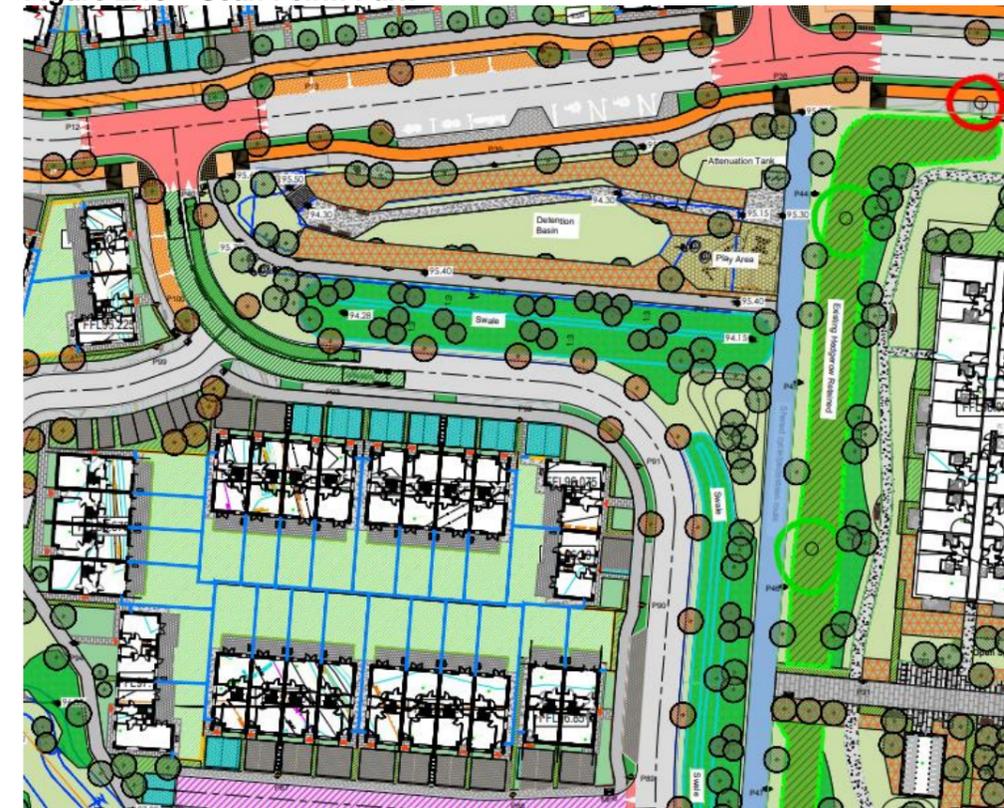
2.36 The proposed development will also provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares is provided.

2.37 The proposed open space for the overall site is c 22.2% therefore meets and exceeds the open space requirements as set out in the 2016 Development Plan (14%) and the draft 2022 Development Plan (15%). Furthermore, it is proposed to provide additional open space comprising Communal Open Space of 1,177 sq. m for the apartments and 1,063 sq. m for the duplex units. (c. 0.27 hectares)

**2.10.3 Landscape Layout and Design**

2.38 The site layout proposal aims to create a unifying streetscape which is rich in detail and diverse in textural and spatial qualities, with open spaces and boundary planting lending a verdant and visually attractive atmosphere. The open spaces are directly over-looked by dwellings, providing passive surveillance for safety. Within the open spaces there are areas for informal play, casual recreation and passive leisure. The quality of these spaces is enhanced by the inclusion of features such as, seating, paths, native planting and landform, and the utilisation of environmentally appropriate materials. Natural Play elements will be incorporated within the spaces. Natural Play incorporates designed elements that enable play spaces to blend in with their surroundings and encouraging interaction with the natural landscape. A restrained palette of materials will also be used to integrate the proposed architectural forms and materials within the landscape.

**Figure 2.15 – Sean Feirm Park**



**2.11 Access**

2.39 The proposed development will be accessed from the L6001 Athgoe Road to the west of the site. The access point from the L6001 Athgoe Road to the west of the site is proposed to be updated to a signalised junction. The proposed signalised junction aims to improve pedestrian accessibility to the existing footpath on Athgoe Road and improve connectivity to Newcastle Main street. There will be a link street providing access from Newcastle Phase 1 (Graydon Development) provided under planning reference ABP 305343-19.

2.40 The proposed link street carriageway is 6.5m to 6.0m wide with a raised adjacent cycle track on each side in the western and eastern area of the site. The cycle facilities deviate from the link street onto a 4m wide greenlink in the centre section of the site. Intermittent parallel parking bays are provided as per the Newcastle LAP, 2012.

- 2.41 The permeability of the site will ensure ease of access for future residents (through a number of modes of travel) to facilities such as Newcastle town centre, its associated retail and commercial services, and public transport facilities such as Dublin Bus stops served by the 68 route.
- 2.42 The proposed development site is proposed to be accessible from 3 no. vehicular access points. The first will be located to the east where the subject lands connecting with the emerging Graydon development lands. The second is via a proposed new signal controlled junction located on Athgoe Road. The third vehicular access is proposed to the north with the R120 Main Street corridor via the emerging 3rd party development currently under construction at this location. The figure below presents the aforementioned site access locations.
- 2.43 The proposed new site access junction on Athgoe Road will take the form of a three-arm signal-controlled junction comprising the following key characteristics:
  - Right turn lane on the southern approach so that right turning vehicles do not delay ahead moving traffic;
  - Pedestrian crossings across all arms to ensure convenient access / egress for non-vehicular modes; and
  - Right turn set back to facilitate any left turning HGV's exiting the site. This set back allows for the provision of 'tight' corner radii (6m) compliant with DMURS to minimise crossing widths for pedestrians and control vehicle speeds.

**Figure 2.16 – Proposed Site Access Locations**



Source: DBFL

**2.11.1 Green Link Cycle Infrastructure**

- 2.44 Green-link cycle infrastructure has been provided throughout the development to link parks, existing roads and local amenities in accordance with the Newcastle LAP 2012. Cycle infrastructure on the east/west link street has been provided as raised adjacent cycle tracks to align with the Newcastle LAP, 2012 and ties into existing cycle infrastructure in the Graydon Development to the east. The cycle facilities deviate from the link street onto a 4m wide greenlink in the centre section of the site. The proposed north/south green link is provided as a 4m wide shared surface for pedestrians and cyclists migrating between the various amenities and runs through predominantly green open space.
- 2.45 The green-link has been designed with no proposed vehicular crossings. The green link ties into the east/west link street at the south of the proposed site and ties into the east/west link street to

the north. The green link has been designed in accordance with TII TD300 (Rural Cycleway Design Guide) and the National Cycle Manual.

**2.12 Parking**

**2.12.1 Car Parking**

- 2.46 The proposed development layout design provides a total of 423 no. car parking spaces comprising 251 no. for the houses and 172 no. for the apartment / duplex units (13 no. car parking assigned to the creche as permitted within the Graydon development and outside of the subject application site boundary).
- 2.47 Disabled car parking spaces are required at a rate of 5% of total car parking provision for the apartment / duplex units which equates to a total of 8 no. dedicated mobility impaired car parking spaces. 13 no. mobility impaired parking spaces are proposed, with 10 to serve the residential units and 1 for the creche (5% required as per SDCC development plan 2016-2022 which equated 2 1 no. bay), and 2 no. universal access drop off bays. Accordingly, this level of provision complies fully with the local development management requirements.
- 2.48 A total of 38 no. electrical vehicle car parking spaces are proposed which equates to 21% of the apartment / duplex car parking provision. It is assumed that residents of the housing units can utilise their private power supply to charge electric vehicles parked in-curtilage and infrastructure in place to allow for future installation of charging points. This provision is higher than both the current SDCC development plan 2016-2022 which requires 10% of parking spaces and draft development plan 2022-2028 which requires 15-20% of parking spaces.
- 2.49 5 no. car share spaces for car club members (e.g. GoCar) are proposed within the development site boundary including 2no. located in close proximity to the houses, 1 no. located at the apartment blocks, 1 no. located at the duplex units and 1 no. located at the creche. Residents / visitors of the subject development can book cars online or via the app for as little as an hour, then unlock with their phone; the keys are in the car, with fuel, insurance and city parking all included.
- 2.50 The benefits of such car sharing services include, (i) the reduction of the number of cars on the road and therefore traffic congestion, noise and air pollution; (ii) frees up land traditionally used for private parking spaces but which may not be used, (iii) increases use of public transport, walking and cycling as the need for car ownership is reduced and (iv) Car sharing allows those who cannot afford a car the opportunity to drive, encouraging social inclusivity.

**Table 2.3 – Proposed Car Parking provision**

Land Use	General	Visitor	Disabled	Electric Vehicles	Car Share	Total
<b>Apartments</b>	84	6	5*	16	1	<b>112</b>
<b>Duplexes</b>	36	8	5*	10	1	<b>60</b>
<b>Houses</b>	227	10	2	10	2	<b>251</b>
<b>Creche**</b>	9	-	1	2	1	<b>13</b>
<b>Subtotal</b>	356	24	13	38	5	<b>436</b>
<b>Total</b>	<b>436</b>					

\* Includes 1 no. drop off space – \*\*Note Creche parking permitted in Graydon development – no additional parking proposed for creche

**2.12.2 Cycle Parking**

2.51 A total of 364 number residential bicycle parking spaces are proposed as part of the development scheme comprising 252 no. long stay secured / sheltered spaces for the residential units and 112 no. short stay parking spaces for the residential units. 6 no. long stay cycle parking spaces are proposed for the creche comprising in addition to the short stay provision (22 no.) permitted as part of the Graydon development located outside the subject application site boundary.

**Table 2.4 – Proposed Cycle Parking provision**

Land Use	Long Stay	Short Stay	Total
Houses <sup>1</sup>	16	18	34
Apartment Blocks	172	66	238
Duplexes / GF Apts	64	28	92
Creche	6	2	6 <sup>2</sup>
<b>Total</b>	<b>258</b>	<b>112</b>	<b>370</b>

<sup>1</sup> Houses with external side access to rear gardens can utilise rear gardens for long stay cycle parking  
<sup>2</sup> Additional 22 no. Short stay parking are permitted Graydon Residential Development – not included in subject application

**2.13 Surface Water Drainage**

- 2.52 An overall surface water drainage strategy was developed by DBFL Consulting Engineers for the overall development site including Phase 1 under planning reference ABP 305343-19 and future zoned lands. This strategy is shown on drawing number 210026-DBFL-CS-SP-DR-C-1202 which outlines each catchment and its corresponding attenuation facility. Surface water runoff from the development will be attenuated to greenfield runoff rates in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS).
- 2.53 Where possible, attenuation facilities have been designed as above ground storage in order to maximize the use of SuDs and limit the requirement of underground tanks to promote biodiversity. This approach was adopted in line with SDCCs Sustainable Drainage Explanatory Design Guide 2022. The open ponds have been designed to cater for the 1:5 year storm in a low flow channel which will be predominantly wet the 1:100 year storm will be stored at the next level which will be predominantly dry and lend itself to a usable amenity space. Where design constraints did not allow for open ponds, attenuation facilities will store up to the 30-year critical storm in underground stormtech attenuation systems and shallow detention basins will be used to store surface water for storms between the 30 year and the 100 year critical storms.
- 2.54 Surface water run-off from the subject site (subject site, future phases and zoned lands as outlined on drawing number 210026-DBFL-CS-SP-DR-C-1202) will be attenuated to greenfield runoff rates (Qbar). The overall catchment and a catchment plan strategy is shown on drawing number 210026-DBFL-CS-SP-DR-C-1202.
- 2.55 Detention basins will be incorporated into the landscape plan with gently sloping side slopes. The maximum open water depth in the detention basins will be 600mm in the 100 year critical storm. An example of a useable detention basin is shown below (from Graydon)



Source: DBFL IDR

**2.14 Foul Sewer**

- 2.56 The existing site is predominantly greenfield and therefore has no foul loading at present. There is an existing 225mm diameter foul sewer on Main Street (R120) to the north of the site. According to records, this foul sewer connects to a 525mm foul sewer on Aylmer Road which ultimately outfalls to Newcastle Pump Station.
- 2.57 Following receipt of the confirmation of feasibility, DBFL and Cairn Homes met with Irish Water regarding the Newcastle Local Network Reinforcement Project and Newcastle Pumping Station. It was agreed that a pumping station within the subject site to pump back to Phase 1 was the optimum solution as the foul outflow would then avoid the network constraints in Newcastle Village. It was also agreed that Cairn Homes would enter into a Project Works Services Agreement (PWSA) on Newcastle Pumping Station to establish if any constraints exist at the pumping station. Cairn Homes entered into this PWSA in April 2021 and agreed to fund the study of the pumping station for Irish Water. As indicated by Irish Water, in the Confirmation of Feasibility, this SHD is not reliant on the Irish Water Newcastle pumping station project by reason of the installation of the on-site pumping station proposed.
- 2.58 The proposed foul drainage system for the subject site will connect to the existing 225mm diameter foul sewer in Newcastle phase 1 provided under planning reference ABP 305343-19. A Wastewater Pumping Station is proposed to serve the majority of the subject site and forms part of this planning application. Foul drainage from the proposed development will drain to a proposed pumping station at the north of the site by gravity before being pumped back to a stand-off manhole at the south of the site and discharging to Newcastle Phase 1 infrastructure. The capacity of the foul infrastructure in phase 1 was reviewed and found to have to have sufficient capacity to accommodate the subject site.
- 2.59 A section to the south of the subject site will not make use of the pumping station and will flow by gravity and discharge to the Newcastle phase 1 where it will be connected. Individual houses will connect to the 225mm diameter foul drains via individual 100mm diameter house connections, as per Irish Water Code of Practice for Wastewater Infrastructure. The proposed foul sewer network is shown on DBFL drawing 210026-DBFL-CS-SPDR-C-1200.

**2.15 Water Supply and Distribution**

- 2.60 The existing site is predominantly greenfield and therefore has no water supply at present. Water supply infrastructure has been constructed as part of Newcastle Phase 1 to the east of the subject site (under planning reference ABP 305343-19) in accordance with the Irish water code of practice. There is a 100mm and 150mm watermain along the L6001 to the west of the subject site. The existing watermains are shown on drawing 210026-DBFL-WM-SP-DR-C-1300.

2.61 It is proposed to connect to the existing 250mm watermain provided in the Newcastle Phase 1 development at Newcastle boulevard to the south east of the site through the link street of the proposed site. A closed valve connection is also proposed to the existing watermain in Athgoe road. The proposed 250mm trunk watermain will serve a number of 150mm diameter watermain loops throughout the development. A number of 100mm watermain loops will be fed from the 150mm watermains along the Local Streets.

## 2.16 Utilities

### 2.16.1 ESB Power

2.62 The existing overhead services on the site will be undergrounded and diverted as required. A new Medium Voltage below ground network will be provided in the proposed development which will connect to the existing ESB Networks infrastructure in the area. Up to 2 new "unit sub-stations" will be provided throughout the site to meet the electrical demands associated with the new houses and duplex units while a further 1no "in-building" sub-station will be provided to serve the apartments.

### 2.16.2 Gas

2.63 If gas is adopted as the fuel source of choice for the heating systems in the scheme, a new gas connection will be made to the existing network. The exact extent and location of these connections will be agreed with Gas Networks Ireland during the design stage of the project.

2.64 All works on the gas supply infrastructure will be carried out in accordance with Gas Networks Ireland relevant guidelines. All gas infrastructure will be below ground with the possible exception of a gas pressure reduction station if required by Gas Networks Ireland.

### 2.16.3 Telecommunications – Eir

2.65 There is an extensive Eir Network in the roads surrounding the site in Graydon located to the east.

2.66 New connections will be made to the existing Eir networks at the boundary of the site and services will be distributed throughout the site as required. The exact extent and location of these connections will be agreed with Eir during the design stage of the project.

### 2.16.4 Telecommunications – Virgin Media

2.67 There is an extensive Virgin Media Network in the roads surrounding the site in in Graydon located to the east.

2.68 New connections will be made to the existing Virgin Media networks at the boundary of the site and services will be distributed throughout the site as required. The exact extent and location of these connections will be agreed with Virgin Media during the design stage of the project.

### 2.16.5 Telecommunications – Mobile

2.69 ISM have prepared a report in relation to Telecommunications. It is noted the existing mobile reception in Newcastle is poor. The assessment identified Radio Frequency coverage for the local geographic area is served by a distinct lack of cells at a range of long distances to the Development on less than a 360° basis, which is not a typical cell pattern for urban/semi-rural Radio Frequency coverage.

2.70 The average indoor coverage signal recorded was -115db across all 3 mobile phone networks. With -85db being the benchmark optimal coverage signal, and anything over -100db being poor too bad, -115db denotes extremely poor coverage for the local area.

2.71 In this regard, it is proposed to include some GPS Antennae and associated cabinets at roof level of the apartment Building, which will improve the existing mobile reception. This is set out in the ISM Report included with the application.

2.72 The proposal includes the following at roof level telecommunications infrastructure comprising 9 no. support poles on ballast mounts (to accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each) & 3 no. poles on lift overrun (to accommodate 2No. Ø0.3m Microwave links each at roof level of Apartment building B, together with associated equipment and cabinets/shrouds)

### 3.0 PLANNING HISTORY

3.1 The following provides details of the relevant recent planning permissions relating to the subject site.

#### 3.1 Subject Site

##### 3.1.1 Reg. Ref.: SD05A/0344

3.2 On the 10<sup>th</sup> of September 2014, SDCC granted permission for an extension of duration to permission SD05A/0344 (which was granted permission by An Bord Pleanála on the 17<sup>th</sup> of August 2006). An extension of duration of the permission was granted by SDCC until the 3<sup>rd</sup> of November 2017. The permission related to:

*'A residential development of 743 no. dwellings including a neighbourhood centre of 1,859.2sq.m. and a creche of 846sq.m., at Ballynakelly and Newcastle South, Newcastle-Lyons, County Dublin. An eight year planning permission is sought. The development comprises of the following: 78 no. 2 bedroom houses; 209 no. 3 bedroom houses; 27 no. 4 bedroom houses; 10 no. 5 bedroom houses; 5 no. apartment blocks containing 7 no. 1 bed apartments, 20 no. 2 bed apartments, 12 no. 3 bed apartment, 4 no. 2 bed duplex units and 2 no. 3 bed duplex units; 57 no. duplex blocks containing 48 no. 2 bedroom duplex units, 151 no. 3 bed duplex units, 52 no. 1 bedroom apartments and 123 no. 2 bedroom apartments. The neighbourhood centre comprises of 5 no. retail units from 69sq.m., 84sq.m., 90.5sq.m., 101sq.m. and 134sq.m.; public house measuring 935.4sq.m., off licence measuring 189sq.m. and restaurant measuring 255sq.m.; the proposed development also provides for 4.155ha of public open space including the provision of a landscaped area adjoining the Tower House on the Athgoe Road; roads infrastructure including 3 no. junctions with Newcastle-Lyons Main Street (R120 Rathcoole Road) and 1 no. junction with Athgoe Road; on and off street car parking; and provision of lands for a traveller accommodation site measuring 0.5 ha; on an overall site of 22.789 hectares; planning permission is also sought for the demolition of 2 no. habitable dwellings. This planning application is accompanied by an Environmental Impact Statement (EIS).'*

#### 3.2 Lands to the East ('Graydon')

##### 3.2.1 SHD-ABP-305343-19

3.3 Planning permission was granted on the 23<sup>rd</sup> of December 2019 for the strategic housing development. The development comprised the demolition of five structures on site and construction of 406 residential units; childcare facility; commercial unit; reservation of a school site; new vehicular, cycle and pedestrian access from Main Street; continuation of Newcastle Boulevard forming part of east-west link street; new public park and associated site development works.

3.4 It is noted the heights ranged from 2-4 storeys.

3.5 The Board considered that

*"subject to compliance with the conditions set out below, the proposed development, having regard to its layout, housing mix and public realm would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design and mix of development and would also be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area."*

3.6 Condition 5 of the permission required the omission of 26 no. dwellings as follows:

*"The proposed development shall be amended to omit house units numbers C(7) to D1(6) inclusive, that is, house numbers: C(7) , C(8), B1(66), B1(67), B2(72), B(71), B(70), B(69), B1(68), A(23), A(24), A(25), A(26), B1(73), F(07), B(74), F(08), B1(75), B1(76), B(77), B(78), B(79), B1(80), C(9) , C(10) and D1(6), as shown on the site layout plan, and the area developed as public open space in conjunction with retention of the existing heritage hedgerow at this location. The landscape plan shall recognise the heritage significance of the hedgerow and shall provide for its enhancement.*

*Revised drawings and documentation showing compliance with this requirement shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development."*

3.7 Condition No. 6(d) of the permission required the omission of 9 no. dwellings as follows:

*"Dwelling unit numbers B2(81), B(82), B(83), B2(84), B2(87), B(86), B1(85), C1(11), and D1(7), as shown on the site layout plan, and the section of link road to the north shall be omitted in order to align future development with the adjoining site to the west. The residential units and link road, which shall be the subject of a future planning application, shall be optimally placed to align with the development of the adjoining site to the west."*

##### 3.2.2 Reg. Ref. SD20A/0178

3.8 On the 30<sup>th</sup> of November 2020, South Dublin County Council granted permission for the following amendment application (which was required by condition 6(d) referenced above) on the wider site:

*"Amendments to the development permitted under Reg. ABP 305343-19 at Newcastle South (development to be known as Graydon) as required under Condition 6(d) of An Bord Pleanala's decision. Amendments consist of: (a) re-alignment of Graydon Drive; (b) provision of 9 three bedroom two storey houses as previously proposed and omitted by Condition 6(d) of permission Reg. ABP 305343-19; (c) extension of Graydon Row by 4m and the provision of 1 additional three bedroom, two storey terraced house; (d) minor revisions to the positioning of 6 houses, necessitated by re-alignment of the road and (e) all associated and ancillary works associated with the development. Proposed amendment will result in the provision of 16 houses where there were 15 previously proposed."*

##### 3.2.3 Reg. Ref. SD20A/0186

3.9 On the 28<sup>th</sup> of October 2020, South Dublin County Council granted permission for the following amendment application on the wider site:

*"The option of the inclusion of an ancillary single storey garden room structure (c. 12.5sqm) in gardens of permitted dwellings under planning reg. ref. ABP305343-19."*

##### 3.2.4 Reg. Ref. SD21A/0038

3.10 On the 15<sup>th</sup> of April South Dublin County Council refused permission for development comprising revisions to the permitted 3-4 storey apartment and duplex apartment building (under planning Reg Ref ABP-305343-19) comprising: omission of the permitted commercial unit at upper ground floor level; reconfiguration of the internal floor plans.

### 3.2.5 SD21A/0247

- 3.11 An application for the demolition of existing derelict dwelling and the construction of a replacement two storey, four bedroom detached dwelling (169.97sq.m) together with all associated landscape, boundary, site and development works was lodged by Cairn Homes Properties Ltd., on the 3rd of September. SDCC granted permission on the 14<sup>th</sup> of December 2021.

### 3.3 Lands to the North

#### 3.3.1 SD20A/0312 (An Bord Pleanála Reference 310998-21)

- 3.12 South Dublin County Council granted permission for development comprising 9 no. residential units in 2 no. blocks at Parson's Court, Ballynakelly, Newcastle, Co. Dublin. The decision was appealed to An Bord Pleanála. A decision is due on the 6<sup>th</sup> of December 2021. At the time of writing a decision had not been made.

#### 3.3.2 SD18A/0363 (An Bord Pleanála Reference 304908-19)

- 3.13 On the 9th of January 2020, An Bord Pleanála granted permission for development which was reduced from 22 no. dwellings to 18 no. dwellings at Further Information stage with SDCC. The compliance layout is shown below.



#### 3.3.3 SD22A/0045

- 3.14 On the 7<sup>th</sup> of April 2022, South Dublin County Council issued a Further Information Request for development comprising the Construction of 6 three bedroom dwelling houses; construction of proposed access road and footpaths; provision of car parking facilities.

#### 3.3.4 SD20A/0037 Supermarket

- 3.15 On the 17th of April 2020 SDCC granted permission for development comprising the Demolition of 3 existing structures on site (total c.226sq.m) comprising of 1 habitable house and 2 associated

outbuildings/sheds (permitted under Ref. ABP-305343-19), and the construction of 1 double storey (c.9.2m overall height) retail development in the form of a convenience supermarket (GFA c.1,759sq.m); 1 two storey mixed-use building (c.10.7m overall height) comprising of a café (c.225sq.m) at ground floor and a community centre at the first floor (c.140sq.m) with associated ground floor access (total GFA c.468sq.m); an ESB sub-station (c.22sq.m); the anchor supermarket unit will provide for a net retail sales area of c.1,222sq.m; a warehouse of c.200sq.m; welfare area of c.190sq.m including ancillary office accommodation; a delivery and loading dock; service yard; customer lobby and wc and entrance lobby; the development shall also provide for 98 car parking spaces and 50 bicycle parking spaces; advertising structures and signage (totalling c.81sq.m); new pedestrian and cyclist connections; public realm areas; refuse storage; a trolley shelter; new priority controlled junction at Main Street; a new access road and shared pedestrian/cyclist greenlink from Main Street (permitted under Ref. ABP-305343-19); vehicular entrances to the surface car park and service yard; all associated site development, site services and landscape works at Lands at Main Street, Newcastle, Co. Dublin, bordered by Main Street to the north, Orchard Grove to the east, greenfield land to the south and residential properties fronting Main Street to the west (new road will be adjacent to 1 Main Street, Newcastle, Co. Dublin.)

#### 3.3.5 SD20A/0343 Amendments to Supermarket

- 3.16 On the 22nd February 2021 SDCC granted permission Amendments to a previously permitted development (Reg SD20A/0037); relocation of the staff welfare and ancillary office accommodation to a new approx. 192sq.m first floor mezzanine level within the permitted anchor supermarket unit; relocation of the staff welfare and office accommodation to mezzanine level will allow for additional warehouse floor space at the ground floor level (approx. 150sq.m increase; there is no proposed increase to the net retail floor space; external amendments to the permitted elevations including glazing and material changes; 2 roof lights will also be provided at roof level; no other changes are proposed to the anchor supermarket unit or the remainder of the development permitted under Reg. SD20A/0037.

#### 3.3.6 SD21A/0311

- 3.17 SDCC granted permission to the Change of use of the permitted cafe unit (approx. 225sq.m net) as granted under ref. S020A/0037 to use as a pharmacy (approx. 251sq.m net) and all associated internal and external layout alterations

#### 4.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

4.1 The key provisions of national and regional planning policy as it relates to the proposed development is set out in the following sections.

##### 4.1 National Planning Framework

4.2 The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

4.3 As a strategic development framework, 'Project Ireland 2040' sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

##### 4.1.1 National Strategic Outcomes

4.4 The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.

4.5 Chapter 4 of the National Planning Framework seeks to make urban places stronger *"to enhance people's experience of living and working in and visiting urban places in Ireland."*

4.6 The following is outlined:

4.7 National Policy Objective 3a of the Draft NPF states that it is a national policy objective to "deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements".

4.8 National Policy Objective 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

4.9 National Policy Objective 13 of the National Planning Framework also states that:

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment"*.

4.10 The NPF also states that *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*.

4.11 National Policy Objective 27 seeks to *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages."*

4.12 National Policy Objective 33 - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

4.13 National Policy Objective 35 - Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

##### 4.1.2 Evaluation of Consistency

4.14 NPO 3a: The proposed development accords with the NPF, in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels.

4.15 NPO 4: The proposed development will provide for a high quality of residential units in accordance with the Apartment Guidelines 2020. The proposed materials and finishes will also be of a high-quality standard in order to create a unique quality urban place. the proposed development will create a high-quality, attractive and liveable place for future residents. The landscaping proposal will provide high-quality public and communal open spaces for the residents to enjoy.

4.16 NPO 13:

4.17 The high-quality design along with proposed density (33.1 units per hectare Gross (37.1 units per hectare net) and a range of heights of the development (2, 3 and 5 storeys) is considered appropriate for the location of the site and the availability of public transport facilities and proximity to supporting services and amenities. The proposed development is therefore in accordance with the objectives of the NPF in this regard.

4.18 The proposed development accords with the National Planning Framework (2018) (NPF), in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements.

4.19 NPO 27: The proposed development is designed to minimise reliance on private car use and encourage sustainable modes of transport. The car parking provision proposed (423 no.), and high levels of cycle parking (370 no. spaces) is to encourage a sustainable alternative mode of transport to the motorcar. The NPF seeks to minimise car-parking in accessible locations and to maximise a modal shift to public transport.

4.20 In accordance with the NPF's strategy of compact growth, it is proposed to develop new homes within an infill site.

4.21 NPO 33: The proposed new homes will be provided at a sustainable location, with access to existing services and facilities, including Newcastle town centre as well as Dublin Bus services (along the R405).

4.22 NPO 35: The proposed density of 33.1 units per hectare Gross (37.1 net) along with duplex apartment and apartment buildings of 3 and 5 storeys is in accordance with NPO 35 which sees to increase residential density in settlements through a range of measures including increased building heights. In accordance with National Policy Objective 35, the proposal will increase residential density within an existing settlement.

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

4.23 Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.

4.24 Rebuilding Ireland is set around 5 no. pillars of proposed actions. Pillar 3 seeks to – Build More Homes: Increase the output of private housing to meet demand at affordable prices.

#### 4.2.1 Evaluation of Consistency

4.25 The proposal will deliver much needed housing within the Metropolitan Area of the Greater Dublin Area in accordance with the aims of Rebuilding Ireland, and in particular Pillar 3, which seeks to build more homes – “to increase the output of private housing to meet demand at affordable prices.”

#### 4.3 Housing for all: A New Housing Plan for Ireland

4.26 The recently published ‘Housing for All: A New Housing Plan for Ireland’, reinforces the critical and strategic need for new dwellings where it is a target to provide 300,000 housing units by the year 2030.

4.27 Housing for All - a New Housing Plan for Ireland’ is the government’s housing plan to 2030. It is a multi-annual, multi-billion euro plan which will improve Ireland’s housing system and deliver more homes of all types for people with different housing needs.

4.28 In order to achieve this, Housing for All provides four pathways to achieving four overarching Housing Policy Objectives:

1. Supporting Homeownership and Increasing Affordability
2. Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
3. Increasing New Housing Supply; and
4. Addressing Vacancy and Efficient Use of Existing Stock.

4.29 The government’s overall objective is that every citizen in the State should have access to good quality homes:

- to purchase or rent at an affordable price;
- built to a high standard and in the right place;
- offering a high quality of life.

4.30 The government’s vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

#### 4.3.1 Evaluation of Consistency

4.31 In this regard the proposed development will allow for new residential community, built to a high standard and quality, within an existing settlement, with its range of amenities and services, in proximity to public transport services.

#### 4.4 Regional Spatial and Economic Strategy 2019

4.32 The Regional Economic and Spatial Strategy (RSES), which was adopted in June 2019, notes that the preferred spatial strategy for the Eastern and Midlands Regional Assembly (EMRA) is the consolidation of Dublin plus the Regional Growth Centres of Athlone, Dundalk and Drogheda, supported by planned focussed growth of a limited number of self-sustaining settlements.

4.33 The RSES outlines that the NPF also sets out the ambitious target to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this, the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities.

#### Regional Policy Objectives

4.34 The following relevant Regional Policy Objectives (RPO) are noted:

4.35 RPO 5.3 states that “Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”

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

#### 4.4.1 Evaluation of Consistency

4.37 The proposed development will consolidate a self-sustaining settlement in the Dublin Metropolitan Area and promote sustainable compact growth with access to local services and schools as well as Dublin Bus services. The proposed development improves connectivity in the wider area through the introduction of linkages within an expanded green infrastructure providing a cycleway and pedestrian paths.

#### 4.5 Transport Strategy for the Greater Dublin Area 2016 - 2035

4.38 This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.

4.39 The Strategy includes five overarching objectives to achieve the vision which are as follows:

- Build and strengthen communities
- Improve economic competitiveness
- Improve the built environment
- Respect and sustain the natural environment
- Reduce personal stress

4.40 The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

4.41 The Strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government’s Transport 21 investment framework are included in all of the strategy options.

#### 4.5.1 Evaluation of Consistency

4.42 The proposed residential development, which provides for a density of 33.1 units per hectare Gross (37.1 net) adjacent to existing good quality public transport, (Dublin Bus Network) is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

**4.6 Draft Greater Dublin Area Transport Strategy 2022-2042**

4.43 The Strategy Aim of this strategy is to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports economic growth.

4.44 The Strategy includes four Strategic Objectives to achieve the aim which are as follows:

- An enhanced natural and built environment;
- connected communities and better quality of life;
- a strong sustainable economy;
- and an inclusive transport system.

4.45 The proposed development is considered to be consistent with the objectives of the draft Transport Strategy as it will support the use of existing public transport connections whilst also promoting sustainable modes of travel such as walking and cycling.

**4.7 BusConnects: Transforming City Bus Services 2018**

4.46 BusConnects is an initiative launched by the National Transport Authority with the aim of overhauling the bus system in the Dublin Region. This initiative includes review of bus services, the definition core bus network which comprises radial, orbital and regional core bus corridors. It also includes enhancements to ticketing and fare systems as well as transition to a new low emission vehicle fleet.

4.47 In relation to the subject site, following this redesign of the bus network, the proposed development will be located in close proximity to the new BusConnects ‘Local’ route 56 (Newcastle-Clondalkin-Red Cow) which will replace the existing DublinBus Route 68/a and new ‘Peak’ route X56 (Newcastle-Peamount-Dublin City Centre) which replaces the existing DublinBus Route 68x. In addition, a new ‘Radial’ route W6 is proposed which will provide public transport connections to locations including Maynooth, Celbridge, Citywest and Tallaght.

**Figure 4.1 – Proposed Site Access Locations Bus Connects**



Source: DBFL TTA

4.48 A summary of the aforementioned new routes are summarised below:

Route	Route Type	Areas Served	Frequency*
L56	Local	Newcastle-Clondalkin-Red Cow	60 mins
X56	Peak	Newcastle-Peamount-Dublin City Centre	1 / peak hr
W6	Orbital	Maynooth-Celbridge-Citywest-Tallaght	30 mins

Source: DBFL

4.49 It is noted an existing public transport capacity report prepared by Derry O’Leary is included with the application.

## 5.0 CONSISTENCY WITH SECTION 28 GUIDELINES

5.1 The key section 28 guidance documents of relevance to the proposed development are as follows:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Sustainable Urban Housing: Design Standards for New Apartments (2020);
- Urban Development and Building Height Guidelines (December 2018);
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Draft Water Service Guidelines for Planning Authorities (2018);
- Quality Homes for Sustainable Communities (2007);
- The Planning System and Flood Risk Management (2009);

### 5.1 Sustainable Residential Development in Urban Areas (2009)

5.2 The Sustainable Residential Development in Urban Areas (SRD) Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. To assist with this, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

5.3 The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (SRD) is to ensure the ‘plan led’ delivery of new development throughout the country.

#### 5.1.1 Evaluation of Consistency

5.4 The proposed development accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). According to the Census 2016, Newcastle had a population of 3,093. For the purposes of the SRD, smaller towns and villages are defined as those with a population ranging from 400 to 5,000 persons.

5.5 It is considered that the most appropriate categorisation of the subject lands is as ‘*small town or village*’ category. Chapter 6 of the Guidelines deals with small towns and villages and sections 6.9 to 6.12 sets out the density standards for (a) centrally located sites, (b) edge of centre sites and (c) edge of small town/village sites.

5.6 It is considered that the proposed development is a mixture of (a) (b) and (c).

5.7 With regard to “*centrally located sites*”, the density standards in the SRD note that:

*“However, within centrally located sites, densities of 30-40+ dwellings per hectare for mainly residential schemes may be appropriate or for more mixed use schemes. There is also the potential for schemes of particularly high architectural and design quality to suggest densities higher than the range suggested above.”*

5.8 For “*edge of centre*” sites the SRD notes that:

*“The emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.”*

5.9 The SRD note that 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.

5.10 The design approach is based on a need to protect the amenities of the surrounding residential development and the design intent is to protect the amenities of the adjoining neighbours and general character of the area and its amenities. While the Local Area Plan indicates a density of c. 15 – 30 units per hectare (net – depending on Neighbourhood), it is considered, that having regard to the location of the site, and national strategic guidance contained in the SRD, the densities proposed within the subject lands are appropriate.

5.11 With regard to the above within the Burgage South area, which is considered to be a centrally located site, where densities of 40+ are encouraged in the SRD. This element of the site comprises c. 1.6 hectares which results in a density of c. 72.5 units per hectare.

5.12 Within the other two areas of the subject lands the density comprises c. 29.4 units per hectare for the Taobh Chnoic Character area (as it relates to the Cairn lands) and c. 21.2 units per hectare for the Sean Feirm Character area (as it relates to Cairn lands). The average density across the area is c. 25.2 hectares across the 2 no. character areas.

5.13 In this regard the average density proposed is c. 33.1 units per hectare Gross (37.1 net) for the Newcastle South lands which takes into account the different contexts within the site and the density ranges contained in the SRD.

5.14 Having regard to the location of the site, national strategic guidance contained in the SRD and clarification in Circular 02/2021 (see below), and also to An Bord Pleanála precedent, the proposed net density of c.37.1 dph is appropriate in this instance and the design of the scheme with different densities in different locations, strikes a balance between providing a sustainable density and also the local context.

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

5.15 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. The 12 criteria are discussed in detail below. This SHD application is accompanied by a Design Statement, prepared by MOLA Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design. The Design Statement should be read in conjunction with this Planning Report and Statement of Consistency and with the plans and particulars accompanying this submission.

5.16 The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on “a distillation of current policy and guidance and tried and tested principles of good urban design.” The 12 no. criteria are assessed as follows:

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

5.17 The proposed development responds to its surroundings by providing attractive streets and open spaces, high quality buildings. The development is arranged so that the apartments are situated

centrally in the village expansion area. The houses are positioned in the southern and western portion of the lands to reflect the lower scale of development in the area. This southern area also includes a mix of duplex units and houses. A series of open spaces are provided such as Sean Feirm Park as well as a north-south green pedestrian route connecting the area to the north and ultimately to the east.

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

- 5.18 The proposed development features an integrated model of street design that provides pedestrian and cyclist priority over the motorcar. The proposed development includes public open space in the form of a 4 no. parks, to the east, north and centre of the site, which is designed to integrate with a green infrastructure network provided around the development.
- 5.19 The park will contain a number of pedestrian links between the development and the wider surroundings of Newcastle, as well as shared surface roads to better connect the development. The layout of the proposal includes for a connection to the north to Newcastle town centre (via St. Finian’s Way). The emphasis of this development will be on the pedestrian and cycle connections that it has to the wider area and to further transport links such as Dublin Bus.
- 5.20 Furthermore, it is noted the site layout includes connections to the east and south to link into the existing cycle and pedestrian facilities permitted in the adjoining Graydon development (currently under construction by Cairn). The development would substantially enhance pedestrian connectivity and permeability in the area.

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

- 5.21 The proposed development includes apartment and duplex apartments which are suitable for mobility impaired persons as well as houses. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M.
- 5.22 The overall development will include 10% social housing which will be provided within the scheme.
- 5.23 The proposed development will provide a variety of vehicle, pedestrian and cycle routes throughout the site. The internal road network provides for a clear navigable route throughout the development with a series of cycle paths and footpaths to increase the overall level of connectivity and permeability for future residents.
- 5.24 The development will provide for disabled car parking spaces and all communal areas and house types are designed to be accessible to all.

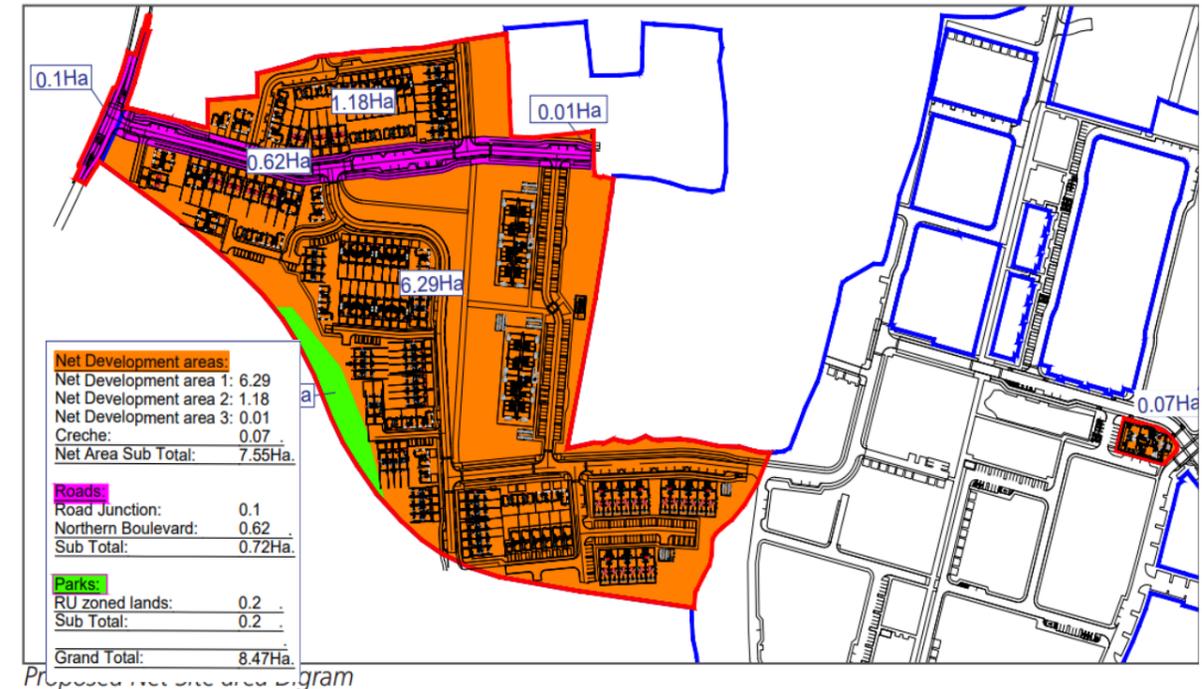
**5.1.2.4 Variety: How does the development promote a good mix of activities?**

- 5.25 The proposed development provides for a good mix of dwelling types including a mix of apartments, duplex apartments and house types of varying sizes. This will ensure a mix of tenures is provided for within the scheme. The proposal also includes 1 no. childcare facility, and a substantial network of public open spaces measuring c. 1.71 ha. The development also includes a creche, located centrally within the scheme, (at the ground floor of Apartment Building B) which can provide a space for a variety of activities, for the future residential communities of the scheme.
- 5.26 It is considered that the proposed development provides for the necessary ancillary land uses required for this residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the wider Newcastle area, including the town’s retail and commercial centre located to the north.

5.27 The proposed development includes for a substantial amount of usable open space in the form of active and passive open space all of which will cater for a wide range of population. We refer the Board to the enclosed Landscape Design Report and drawings prepared by Murray Associates Landscape Architects for further detail.

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

5.28 The proposed development proposes 280 no. dwellings on a site of c. 7.55 hectares (net) resulting in a gross density of 33.1 units per hectare Gross (37.1 net) on a site of c. 8.47 hectares. This density makes efficient use of the residential zoned land.



5.29 As set out in the Landscape Report by Murray Associates Landscape Architects, the proposed development is an exemplar of green infrastructure design for urban residential contexts. A wide range of public green open spaces would be created for active and passive recreation. Large parkland areas are proposed, incorporating improved natural and man-made drainage features, and a variety of habitats.

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

5.30 In this case, the Site Layout Plan has been devised to provide a legible, permeable layout which allows for future connections to the west and, in future, the east and north if required through its connection to the ‘Graydon’ permitted development. The Landscape Design Report prepared by Murray Associates Landscape Architects sets out in detail the landscaping– all of which will form a strong and positive identity for the proposed development.

5.31 There is a variety and mix of dwelling types, heights and design, with a mix of apartment buildings and houses, proposed throughout the scheme, thereby providing a distinctive sense of place on site. In this regard it is proposed to provide a range of dwelling typologies as set out above, including apartments, duplex units/terrace and detached and semi-detached dwellings.

5.32 The proposed finishes on the apartment buildings have been carefully considered to provide variety in robust materials and planting to provide distinct character areas.

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

5.33 The priority for the design team is to propose a pedestrian friendly series of streets and spaces whereby the proposed site layout plan provides for a legible, permeable and distinctive layout, as well as the provision of a range of dwelling types together with a varied use of materials and finishes, to engender a definitive sense of place in a new residential community. The structure of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above. We refer the Board to the DMURS Compliance Statement prepared by DBFL Consulting Engineers, which sets out how the proposed development provides people-friendly streets.

5.34 The internal layout has been designed with pedestrian and cyclists to the forefront and with traffic safety in mind. Reduction of vehicle speed is a fundamental principle behind the layout. In general, all roads are designed for maximum vehicle speeds of 30 km/h. Traffic calming features have also been designed into the development – all in accordance with best practice (DMURS).

5.35 Shared surfaces are proposed at all junctions and on parts of the road network through the lower density area, and all buildings have frontage to the streets.

5.36 The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists and vehicles. The hierarchy of streets and routes are clearly defined (as per the Newcastle Local Area Plan 2012 [as extended to December 7<sup>th</sup> 2022]).

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

5.37 The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered so as to provide a high level of passive surveillance on both the area of open space and public access areas. The design of the dwellings provides for a direct frontage onto all public areas ensuring the provision of a safe, secure and enjoyable residential development.

5.38 The location layout and usability of the proposed public open space areas are of a very high quality and will contribute positively to the residential amenity of future residents. The proposed development will also provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares is provided.

5.39 The proposed open space for the development at 22.2% therefore meets and exceeds the open space requirements as set out in the 2016 Development Plan (14%) and Draft Development Plan 2022 (15%). Additional communal open space of c. 0.27 ha is also provided.

5.40 The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high-quality finish as illustrated in the Landscape Design Statement by Murray Associates Landscape Architects, which confirms a high degree of amenity for future residents of the scheme.

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

5.41 Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of studio, 1, 2, 3, and 4-bedroom units.

5.42 The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed house types incorporate generous space standards so as to provide for adaptable living requirements. The MOLA Architectural Design Statement provides further detail on the adaptability of the buildings. In addition, Lifecycle Report (prepared by Cairn, MOLA Architects and Murray Associates Landscape Architects) provides detail on the robustness of the materials reducing future running costs etc.

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

5.43 Each dwelling is provided with an area of useable private open space which meets or exceeds the Development Plan standards. All of the apartments meet or exceed the Section 28 Guidelines unit size requirements. The design of dwellings has also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling. It is noted there are no north facing units within the scheme. 50 % of the apartments/duplex units are dual aspect, with no north facing apartments.

5.44 The development provides for appropriate separate distances between dwellings at 22m. This maintains a high level of privacy and amenity obtained by residents and reduced the level of overlooking and overshadowing.

5.45 In this regard, reference should be made to Housing Quality Assessment prepared by MOLA Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.

5.46 In summary, it is confirmed that each proposed residential unit has an area of useable private outdoor space as well as being in accordance with storage requirements.

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

5.47 It is proposed to provide 423 no. car parking spaces and 370 no. cycle spaces within the scheme (including permitted creche elements). The houses will be provided with a total of 251 no. car spaces with 172 no. car parking spaces for the apartments (1.13 car parking spaces per apartment/duplex apartment). Visitor cycle parking is included. 13 no. car parking spaces are already permitted for the creche.

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

5.48 The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by MOLA Architects. The landscape design rationale is set out in the Landscape Design Statement prepared by Murray Associates Landscape Architects. The views and comments provided by the Planning Authority and the Parks Department of South Dublin County Council, have also informed the final design outcome.

5.49 The proposed buildings and landscape are of extremely high-quality design and material quality and would elevate the townscape value of the locality.

## 5.2 Sustainable Urban Housing: Design Standards for New Apartments 2020

5.50 Updated Sustainable Urban Housing Design Standards for New Apartments were published in December 2020. The guidelines provide for revised guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

### 5.2.1 Evaluation of Consistency

5.51 This SHD application is accompanied by a Housing Quality Assessment, prepared by MOLA Architects, which demonstrates that the proposed apartments and associated communal spaces will conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments.

5.52 The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

#### 5.2.1.1 Specific Planning Policy Requirement 1 (Mix)

5.53 Specific Planning Policy Requirement 1 (SPPR1) states that 'Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)'.

5.54 Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios).

**Table 5.1 – Overall Apartments Mix**

	1 bedroom	2 bedroom	3 bedroom	Overall
Apartments	54	62		116
Duplex Apartments		18	18	36
Total	54	80	18	152
Overall Mix %	35.5%	52.6%	11.8%	

5.55 The proposed development complies with SPPR 1 as it includes 152 no. apartments, comprising 35.5% (54 no. 1 bedroom units), 52.6% (80 no. 2-bedroom units) and 11.8% (18 no. 3-bedroom units).

5.56 We also note that no Housing Need and Demand Assessment has been undertaken by the Planning Authority for this area of the County, and it is therefore submitted that the proposed unit mix is consistent with the relevant planning policy requirement for Unit Mix.

#### 5.2.1.2 Specific Planning Policy Requirement 2 (Small Urban Infill Sites)

5.57 This is not relevant to the subject site.

#### 5.2.1.3 Specific Planning Policy Requirement 3 (Minimum Areas)

5.58 SPPR3 of the Apartment Guidelines 2018 state that the following minimum floor areas for apartments apply:

- Studio apartment Minimum 37 sq.m;
- 1 bedroom apartment Minimum 45 sq.m;
- 2 bedroom apartment Minimum 73 sq.m;
- 3 bedroom apartment Minimum 90 sq.m;

5.59 The proposed development complies with the minimum apartment floor area requirements set out in SPPR3. The schedule of accommodation / Residential Quality Audit and drawings prepared by MOLA Architects demonstrates that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2018.

**Table 5.2 - Compliance with SPPR3**

Apartment Type	Apartment Guidelines 2020	Proposed Apartment Size
54 no. 1 bed / 2 person Apartments (AP-1A)	45 sq. m	50.70 sq. m
62 no. 2 bedroom / 4 person Apartments (AP – 2A & AP-2C)	73 sq. m	79 sq. m
12 no. 2 bedroom Apartments (DA-1 duplex)	73 sq. m	84.28 sq. m
6 no. 2 bedroom Apartments (DA-2 duplex)	73 sq. m	85 sq. m
12 no. 3 bedroom Apartments (DA-3 duplex)	90 sq. m	125.18 sq. m
6 no. 3 bedroom Apartments (DA-4 duplex)	90 sq. m	130.16 sq. m

Source: MOLA Architects Accommodation Schedule

5.60 In addition, the Guidelines state that 'the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total but are not calculable as units that exceed the minimum by at least 10%).

5.61 The proposed development complies with the above.

#### 5.2.1.4 Specific Planning Policy Requirement 4 (Aspect)

5.62 SPPR4 of the Guidelines relates to the provision of dual aspect units and states the following:

*“Specific Planning Policy Requirement 4*

*In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

*(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.” (Emphasis added)*

5.63 Having regard to the location of the apartments/duplex apartments with good accessibility to the town centre, it is considered the subject lands is a suburban or intermediate location and it is proposed to provide 50% dual aspect apartments/duplex apartments. There are no north facing single aspect units within the scheme.

#### 5.2.1.5 Specific Planning Policy Requirement 5 (floor to ceiling heights)

5.64 The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level.

#### 5.2.1.6 Specific Planning Policy Requirement 6 (Max units per core)

5.65 SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes.

5.66 The apartment to stair/lift core ratio is 12 no. apartments per core which is in compliance with SPPR6.

5.67 The proposal complies with this SPPR6.

5.68 The Housing Quality Assessment, prepared by MOLA Architects demonstrates how the proposed apartments comply with appendix 1 of the Apartment Guidelines 2020 in respect of sizes of apartments, minimum aggregate floor areas, widths, storage, minimum private open space.

5.69 With reference to communal open space the proposed development would require a communal open space provision of 992 sq. m using the following calculations:

**Table 5.3 – Communal Open Space Requirement**

	Communal Open Space Sq. m	No. of Units	Requirement Sq. m
1 bed	5	54	270
2 bed	7	80	560
3 bed	9	18	162
<b>Total</b>		152	992

5.70 The communal open space provided comprises 2,690 sq. m communal open space consisting of 1,627 sq. m for the apartments and 1,063 sq. m for the duplex units, which is c. 2 and a half times the required provision.

5.71 This figure excludes the areas of Public Open Space of c. 1.71 hectares.

#### 5.2.1.7 SPPR 7, 8 and 9- Build to Rent and Shared Accommodation

5.72 The above SPPR's do not apply to the proposed development.

#### 5.2.1.8 Parking

5.73 The car parking provision for the proposed apartments/ duplex units could be described as having characteristics of an intermediate location or a 'peripheral or less accessible urban locations,' where 'one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.'

5.74 In this regard, it is proposed to provide a total of 172 no. apartment / duplex car parking spaces (1.13 spaces per unit), which is considered appropriate noting it is a general requirement only.

### 5.3 Urban Development and Building Heights (December 2018)

5.75 The Government published the Urban Development and Height Guidelines in 2018. The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040.

5.76 The Guidelines acknowledge that Planning Authorities have set generic maximum height limits that can undermine wider national policy objectives to provide more compact forms of urban development and continue an unsustainable pattern of urban sprawl, rather than consolidating and strengthening the existing built-up area in accordance with National Planning Policy.

5.77 The Guidelines emphasise the policies of the NPF to greatly increase levels of residential development in urban centres and significantly increase building heights and overall density and to ensure that the transition towards increased heights and densities is not only facilitated but actively sought out and brought forward by the planning process and particularly at Local Authority level and An Bord Pleanála level.

5.78 Under SPPR3 it is a specific planning policy requirement that where an applicant demonstrates compliance with the height criteria, the assessment of the planning authority or the Board must take account of the wider strategic and national policy parameters set out in the National Planning Framework and the Building Height Guidelines.

5.79 SPPR 3 states:

*“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.”*

5.80 The Urban Development and Building Heights contain SPPR 4 which requires:

*“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 (2009)” 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.”*

#### 5.3.1 Evaluation of Consistency

5.81 With regard to SPPR4, the subject lands provide an appropriate 33.1 units per hectare Gross (37.1 net) across the lands for a small town, with the higher density elements closer to the town centre, and a lower density at the edge. With reference to point 2, the development includes a wide range

of building heights comprising 2 storey houses, 3 storey duplex buildings, and 2 no. 5 storey apartment buildings, and also avoids mono-type buildings, with a mix and range of building typologies, comprising houses, duplex apartments and apartments.

5.82 Section 3.4 to 3.8 of the Guidelines deal specifically with building height in suburban/edge locations. In this respect the Guidelines note that new development which includes townhouses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards) deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments are beneficial in addressing the need for more 1- and 2-bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more-bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation.

5.83 The Guidelines introduce Development Management criteria which proposals for higher buildings will be required to satisfy (as per SPPR3 above). While the heights proposed (which include 3 and 5 storey buildings) are not considered to constitute taller buildings, the relevant criteria in respect of the proposed residential development are noted and responded to as follows:

5.84 With reference to Section 3.2 of the Height Guidelines the following is noted:

**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.

5.85 As set out in the DBFL TTA, Dublin Bus operates 2 no. routes (one of which is an express route) that serve the subject lands including the number 68/a and 68x (Newcastle – Greenogue Business Park Towards Dublin City Centre). These routes provide links from the subject site's general vicinity to the city centre and all intermediate destinations. The associated bus stops are all within convenient walking distance of the subject site. Dualway Transport (accessible at the Aylmer road bus stop) provides two daily services (Route 311) from Newcastle/Rathcoole to The Square, Tallaght from Mondays to Fridays.

5.86 The subject site is located c. 4km from the Hazelhatch and Celbridge rail station where services between Dublin Heuston and various destinations including Cork, Galway and Limerick / Ennis. The Hazelhatch and Celbridge rail station benefits from a Park & Ride facility incorporating 400 no. car parking spaces. In addition, the Saggart LUAS station and Cheeverstown LUAS P & R station are located approximately 5.5km and 8.0km respectively to the east of the subject site providing access to LUAS Red Line services operating between Saggart and Connolly Station / The Point via Dublin City Centre.

5.87 We also refer the Board to the Public Transport Capacity Assessment prepared by Derry O'Leary which concludes:

*This assessment of the existing Newcastle bus network, the spare capacity currently on these routes, the scale of rail travel from Hazelhatch station together with the planned BusConnects routings and DART+ South West project lead to the following key conclusions.*

1. *There are significant levels of spare capacity on the current bus network in the immediate area of the subject site, as shown by the bus stop surveys undertaken for this report.*
2. *The Census 2016 data shows the relatively strong attraction to commuting by rail from this area.*
3. *The NTA's BusConnects project proposals include an attractive new orbital route of direct benefit to the development. This will radically enhance orbital connectivity to neighbouring urban centres and rail and LUAS services.*

4. *The completion of the DART+ South West project will transform rail commuting options in this area, greatly reducing the journey time to Dublin's CBD.*

5. *The Newcastle South SHD site is well positioned to benefit from the proposed Bus Connects and DART+ public transport network.*

6. *The combination of a new bus link on route W6 to Hazelhatch station and much improved DART frequencies and speeds will strongly support the case for strong growth in rail commuting from the subject site in Newcastle*

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.

5.88 The South Dublin County Development Plan does not list any relevant protected views or prospects in the vicinity of the site. The proposed development is not located within an architecturally sensitive area. The proposed development is located on lands zoned for residential development in the South Dublin County Development, directly adjacent to existing and proposed residential developments.

5.89 For the Summary of Effects on the Landscape, The LVIA prepared by Murray Associates contained in the EIAR concludes:

*"The landscape impacts due to the proposed development would overall be not-significant and negative, particularly considering the general low sensitivity of the landscape and the fact that the most significant hedgerows will be retained and where hedgerows are removed, they will be reinstated or marked in the landscape design.*

*Landscape works are proposed to reduce and offset any impacts generated due to the proposed development, where possible. The planting of substantial numbers of new native trees and other planting will enhance the overall appearance of the new development.*

*The impact is primarily mitigated by the potential quality of the proposed public realm including new parks and greenways, the cohesive land use and pattern that would result, and the new spaces, landscape features and distinctiveness introduced by the proposed development and its associated landscape spaces and planting interventions. The proposed planting will substantially increase the tree resource and tree quality in the area overall.*

*Moderate positive landscape amenity impacts due to the provision of new parks and greenways occurs as a result of the proposed development.*

*In the longer term, the assessment concludes that there will be some continuing moderately negative visual impacts to receptors immediately adjacent to the north and northeast, with not significant negative visual impacts to receptors to the west and south of the site and some imperceptibly negative/neutral visual impacts to the residential receptors further away to the south-east, west and east. As above, it is important to note that the proposed development is reflective of the existing and emerging development trends in the area in terms of massing and scale, located in 'Graydon' to the east.*

*The residual impacts on views is somewhat mitigated by the inclusion of additional tree planting, hedgerow planting, woodland planting, resulting in a slight improvement in screening measures to the south, though not significantly enough to change the assessment.*

*"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.”*

5.90 The proposed layout has been informed by the key strategies outlined in the LAP relating to green infrastructure, access and movement, land use and density and built form. The layout will create high-quality streets and public spaces. Increased heights of 3 & 5 storeys have been provided at discrete locations in order to ensure that the proposed development takes place at a sustainable density. Increased heights are proposed at locations adjoining public spaces and in particular along the greenway. The infill development of 5 storeys within the Burgage plot layout responds to the topography of the site and will be absorbed into the existing hedgerows. The building heights assist in providing a variety in scale and form, assisting in overlooking and enclosing public open space and will create visual interest in the landscape.

**“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.”*

5.91 The proposed development is broadly consistent with prevailing building heights. Three and five storey elements have been carefully considered and will integrate successfully with the emerging new residential precinct and will make a positive contribution to the placemaking/streetscape. The existing context includes 3 storey duplex units in Graydon as well as 4 storey apartment building both located in Graydon.

5.92 The apartments will sit comfortably within the Burgage Plots sited behind the hedgerows which allows for passive surveillance within the Burgage Plot and also externally.

5.93 Located towards the middle of the plot away from the hedgerows the apartments are proposed as secondary landmark buildings. The increase in height of these blocks has reduced the footprint of development in this part of the site. This has allowed the design of the public open spaces and the required communal amenity space to wrap around the apartments and incorporate the historical burgage hedgerows. The burgage hedgerows will now be within public and managed areas as opposed to forming boundaries to private gardens where they can't be protected and managed as easily.

5.94 The proposed three storey Duplex blocks have been located by the eastern road connection with the adjacent Graydon development. These blocks will act as a secondary landmark with a placemaking function of indicating where the Graydon development ends and this new development starts. With reference to the context driven approach the three storey duplex blocks are located within an area with a 2 storey prevailing building height. Therefore a contextual Height Ratio can be used to show the actual amplification of the prevailing height of the proposed three storey Duplex blocks.

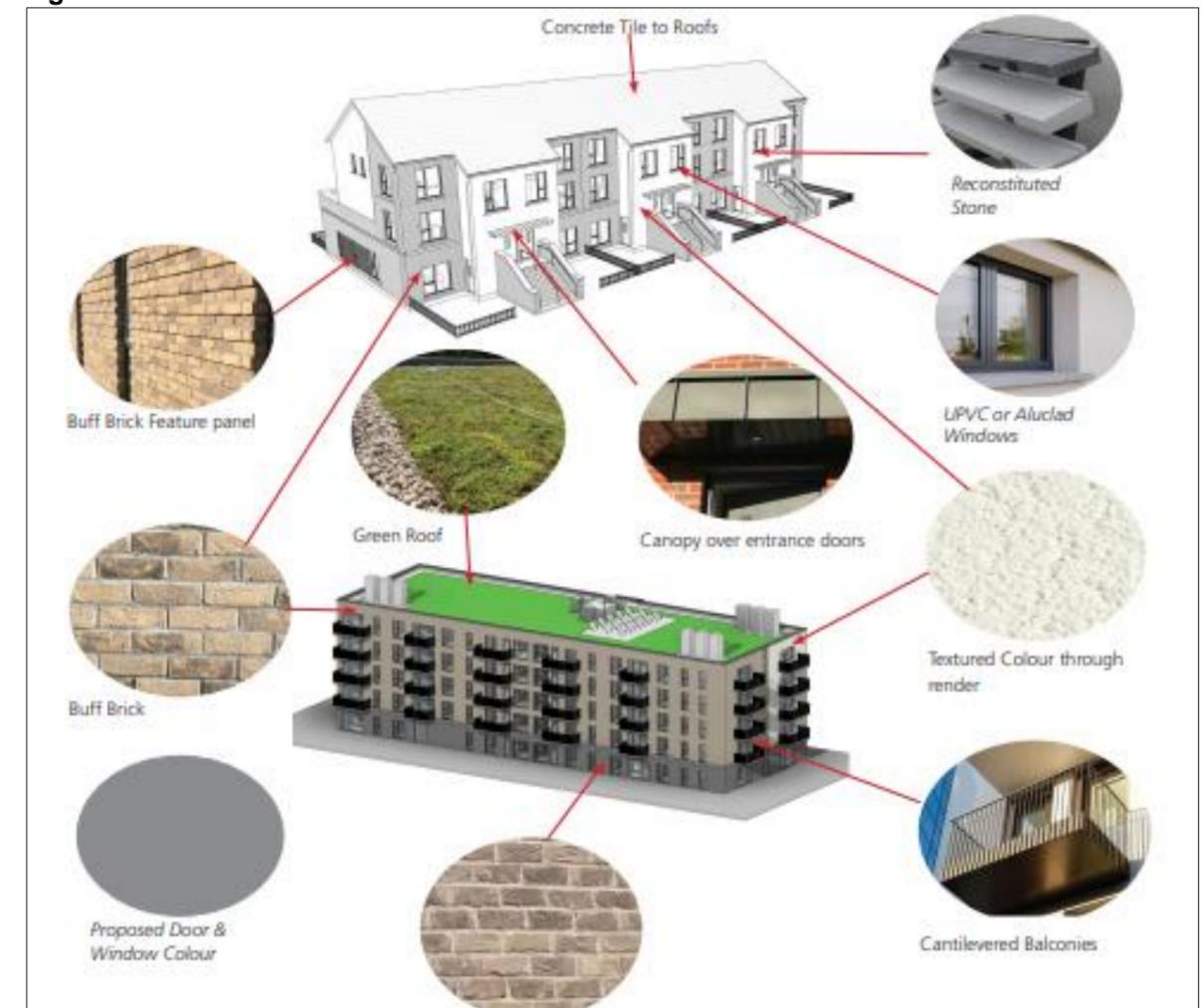
*“The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.”*

5.95 The proposal is not monolithic. The taller elements proposed are at discrete locations within the Burgage plot arrangement, centrally within the scheme, in 2 no. buildings. The buildings will sit comfortably within the Burgage Plot behind the hedgerows.

5.96 The choice of architectural style and finish reflects the applicants desire to create a development which is attractive, contemporary and robust. All houses, duplex and apartment units, share a similar architectural language which will bring coherence to the development. The materials proposed are durable and low in maintenance requirements. The design will incorporate the latest technologies to achieve the highest standards in energy efficiency.

5.97 Like the houses the materials proposed are durable and low in maintenance requirements. The design will incorporate the latest technologies to achieve the highest standards in energy efficiency. The duplex units are broken up using panels of buff brick that are then punctuated with the projected entrance bays that are of an off white render finish. The rear of the duplex units follows the buff brick around at ground floor level with the upper first and second floors set back with an off white render finish. The ground floor gables have a buff brick feature panel and reconstituted stone sills to window cills and copings are proposed through out. The roof is a traditional concrete tiled pitched roof with black coloured gutters, downpipes, fascias and soffits. The apartments have a combination of brown and buff coloured brickwork along with off white render to continue the overall architectural language of the development. The different materials and colours help to break up the massing of the elevations. The brown coloured brick is used to form a plinth at ground floor, with the buff coloured brick and off white render used on the upper levels. A soldier course band provides a break at first floor level where either the buff brick or render starts. The brown coloured brick extends up the projected staircases at the entrances to the apartments forming a vertical feature element to the buildings. A double-glazed UPVC or Aluclad window system is proposed for the scheme, incorporating opening sections and balcony/terrace doors and entrances. Selected metal canopies are proposed to the entrance doors of the duplex units and apartment blocks.

**Figure 5.1 – Materials**



*“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).”*

5.98 The taller elements, duplexes and the infill site within the Burgage Plot, have been carefully selected to ensure that the height is appropriate to the existing and future context. In particular, three storey duplex units are proposed at locations where they will create a sense of scale and enclosures adjoining public open spaces and also providing enhance passive surveillance.

5.99 As set out in the Site Specific Flood Risk Assessment prepared by DBFL, the subject lands are located in Flood Risk Zone C and appropriate for a residential development.

*“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.”*

5.100 The taller elements, duplexes and the infill site within the Burgage Plot, have been carefully selected to ensure that the height is appropriate to the existing and future context. In particular, three storey duplex units are proposed at locations where they will create a sense of scale and enclosures adjoining public open spaces and also providing enhance passive surveillance.

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

5.101 The proposal will positively contribute to the range of housing typologies including apartments, duplex apartments, and houses available in the neighbourhood as well as a creche, providing a mix of uses. The proposed development includes 152 no. apartments, comprising 35.5% (54 no. 1 bedroom units), 52.6% (80 no. 2-bedroom units) and 11.8% (18 no. 3-bedroom units). In addition it is proposed to provide 128 no. houses (8 no. 2 bedroom houses, 94 no. 3 bedroom houses, 25 no. 4 bedroom houses and 1 no. 5 bedroom house).

**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*

5.102 The apartments (orientated east west) and the duplex units have been designed to maximise access to natural daylight and ventilation. Opportunities for views across open spaces have been maximised with appropriate separation distances from existing and proposed dwelling to ensure future potential overshadowing or overlooking is minimised.

*“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 or 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.”*

5.103 The duplex units and the Mixed-Use building have been designed and sited to maximise daylight to units. A quantitative performance assessment of daylight provision to the proposed apartment has been prepared by 3D Design Bureau which states:

**“Effect on Vertical Sky Component (VSC)**

*The effect on VSC has been assessed for 70 No. windows across the surrounding properties. Using the rationale explained in section 2.2 on page 6, the effect to VSC on 70 no. of these windows would be considered imperceptible. This shows that all of the assessed windows will experience an imperceptible level of effect. The complete results for the study on the effect on VSC caused by the proposed development can be found in Section 6.1 on page 19*

**Effect on Annual/Winter Probable Sunlight Hours (APSH/WPSH)**

*The APSH/WPSH assessment has been carried out on the relevant windows of the surrounding properties that have an orientation within 90 degrees of due south. The effect on APSH/WPSH has been assessed for 70 no. of windows of the surrounding existing properties across Saint Ann’s, Primrose Lodge, Auburn Lodge, Main Street Upper, Aois Earrach, Saint Finian’s Way. Using the rationale explained in section 2.2 on page 6, the effect on the APSH of 70 no. of these windows would be considered imperceptible. All of these windows have met the criteria for effect on APSH/WPSH as set out in the BRE Guidelines.*

**Effect on Sun On Ground in Existing Gardens**

*This study has assessed the effect the proposed development would have on the level of sunlight on March 21st in the rear gardens of the neighbouring properties that are located along Saint Ann’s, Auburn Lodge, Main Street Upper, Aois Earrach, Saint Finian’s Way. In total 22 no. spaces have been assessed. Using the rationale explained in section 2.2 on page 6, 22 no. of which would experience an imperceptible level of effect. 100% of these outdoor spaces have met the criteria for effect on sunlighting as set out in the BRE Guidelines. The complete results of the study on effect on sunlight the neighbouring gardens can be found in section 6.3 on page 40. A visual representation of these readings can be seen in the 2 hour false colour plans in section 6.3 and in the hourly shadow diagrams for March 21st in section 6.4.1 on page 42*

**Sun On Ground in Proposed Outdoor Amenity Areas**

*This study has assessed the level of sunlight on March 21st with in the proposed amenity areas. In total 10 No. spaces have been assessed, 10 No. of which would meet the criteria as set out in the BRE Guidelines. The complete results for the study on sunlighting in the proposed outdoor amenity spaces can be found in section 7.2 on page 61. A visual representation of these readings can be seen in the false colour plan in section 7.2 and in the hourly shadow diagrams for March 21st in section 6.4.1 on page 42*

**Average Daylight Factor (ADF)**

*This study has assessed the Average Daylight Factor (ADF) received in all the habitable rooms of the apartments in the 2 no. proposed 5-storey buildings, which are considered the higher density element of the proposed scheme. The 2 no. buildings assessed consist of 116 no. units, which makes up 294 no. habitable rooms. The ADF value in 294 no. habitable rooms meet or exceed their target values. This gives a circa compliance rate of 100% for the 2 no. buildings assessed. Given the fact that an appropriate level of density is being targeted and the apartment blocks are fully compliant, the results of the ADF study could be considered to be favourable. The complete results for the study on ADF can be seen in section 7.2 on page 61.”*

**Specific Assessments**

5.104 The Guidelines note 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.”*

- 5.105 Having regard to the nature of the proposal comprising 3 and 5 storey buildings, it is not considered that there will any issues relating to downdraft. Notwithstanding this we refer the Board to the enclosed report from BFluid Consultants which states:

*“The results of this wind microclimate study are utilized by Cairn Homes Properties Ltd. to configure the optimal layout for Newcastle Development for the aim of achieving a highquality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian) and not to introduce any critical wind impact on the surrounding areas and on the existing buildings.*

- The wind profile was built using the annual average of meteorology data collected at Dublin Airport Weather Station. In particular, the local wind climate was determined from historical meteorological data recorded 10m above ground level at Dublin Airport.*
- The prevailing wind directions for the site are identified in the West, West-South-West, West-West-South and South-East. • Microclimate Assessment of Newcastle Development and it’s environment was performed utilizing a CFD (Computational Fluid Dynamics) methodology.*
- The proposed Newcastle Development has been designed in order to produce a high-quality environment that is attractive and comfortable for pedestrians of all categories. To achieve this objective, throughout the design process, the impact of wind has been considered and analysed, in the areas where critical patterns were found, the appropriate mitigation measures were introduced.*
- As a result of the final proposed and mitigated design, wind flow speeds at ground floor are shown to be within tenable conditions. Some higher velocity indicating minor funnelling effects are found near between houses and apartment blocks. However, the areas can be utilised for the intended use (Walking and strolling).*
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for “Frail persons or cyclists” and for members of the “General Public” in the surrounding of the development.*
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. • During the construction of Newcastle Development the predicted impacts are classified as negligible.”*

*“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.”*

- 5.106 We refer the Board to the Biodiversity chapter of the EIAR and the Bat Report (Appendix G of the EIAR) prepared by Altemar which states:

*“No significant effects are foreseen from the operation of the proposed development. The retention of hedgerows in addition to the planting of hedgerows and trees would offset the loss seen during the construction. No significant effects would be foreseen in relation to the heights and types of the buildings proposed and bird collision.*

*“There is no evidence of a current bat roost on site, therefore no negative impacts on roosts these animals are expected to result from the proposed development. The likelihood bat collision is not significant as the materials proposed are generally solid and would have good acoustic properties to reflect echolocation signals.”*

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

- 5.107 We refer the Board to the enclosed ISM report. It is noted the existing mobile reception in Newcastle is poor. The assessment identified Radio Frequency coverage for the local geographic area is served by a distinct lack of cells at a range of long distances to the Development on less than a 360° basis, which is not a typical cell pattern for urban/semi-rural Radio Frequency coverage.

- 5.108 The average indoor coverage signal recorded was -115db across all 3 mobile phone networks. With -85db being the benchmark optimal coverage signal, and anything over -100db being poor too bad, -115db denotes extremely poor coverage for the local area.

- 2.73 In this regard, it is proposed to include some GPS Antennae and associated cabinets at roof level of the apartment Building, which will improve the existing mobile reception. This is set out in the ISM Report included with the application.

- 2.74 The proposal includes the following at roof level telecommunications infrastructure comprising 9 no. support poles on ballast mounts (to accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each) & 3 no. poles on lift overrun (to accommodate 2No. Ø0.3m Microwave links each at roof level of Apartment building B, together with associated equipment and cabinets/shrouds).

- 2.75 The report concludes the following in relation to the proposed telecommunications infrastructure:

*“This will undoubtedly provide an adequate solution for the Applicant to mitigate the impact the Development will have on the existing poor mobile phone signal in the area and provide both the occupants of the Development and the local area with adequate voice and data services to meet modern demands. Refer to Figures 8 of the appendices for full analysis and installation parameters for all the proposed replacement telecommunication infrastructure set out herein. ISM can therefore conclude that the proposal being made by the Applicant within its submission to An Bord Pleanála allows for the retention of important Telecommunication Channels, such as Microwave links, to satisfy the criteria of Section 3.2 of the Building Height Guidelines (2018).”*

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

- 5.109 We refer the Board to the report prepared by, O’Dwyer & Jones Design Partnership which states:

*“Obstacle Limitation Surfaces in General*

*The site at Newcastle South lies well clear of all Approach Surfaces, Take-Off Climb Surfaces, and Transitional Surfaces at Casement Aerodrome (which are the more important I.C.A.O. Obstacle Limitation Surfaces). It does however lie under Casement Aerodrome’s Inner Horizontal Surface, which is at 131.6m OD.*

*The Site in relation to Casement Aerodrome’s Inner Horizontal Surface*

*Ground levels on the site are at 7-15m above the elevation of the nearest runway threshold [Thr 10] at 86.6m OD, which is also the elevation of Casement’s datum level. The proposed development is of low-rise 2-storey housing and 3-storey apartment & duplex units, with two 5-storey apartment blocks of 16.1m height each (to parapet level). The highest items on the site are telecommunications shrouds on one of the apartment blocks whose tops are at 114.6m OD elevation.*

*Consequently, all of the development is fully clear of Casement's Inner Horizontal Surface – with 17 metres to spare above its highest points. This will provide ample room for the operation of cranes on site.*

*In addition, the proposed development is fully clear of any 'building restricted areas' associated with the navigational equipment at Casement Aerodrome.*

#### 10.3 Overall

*We are satisfied that the proposed residential development at Newcastle South complies fully with all aviation and aeronautical requirements affecting the site."*

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

- 5.110 We refer the Board to the Urban Design Statement prepared by MOLA Architects and to the Cultural Heritage Chapter of the EIAR, prepared by Rob Goodbody Historic Buildings Consultant which states:

*"There will be no direct effect on architectural heritage during the operational phase as a direct effect indicates alterations to the structures and there will be no alterations to structures outside the site boundary.*

*There will be indirect effects on some structures of architectural heritage significance during the operational phase*

*It is noted that the inclusion of the 2 five-storey apartment buildings and the 3 three-storey duplex buildings, will not result in any additional negative indirect effects on the tower house, Newcastle Farm or the architectural conservation area over and above the potential operational phase effects arising from the development of the lands in accordance with the layouts and scale, massing etc, envisaged in the Newcastle LAP, as those heritage elements are at a distance from the proposed buildings, as outlined above in section 14.6.*

*It is also noted that the layout in the Newcastle LAP included the burgage hedgerow plots in the rear gardens of dwellings, which would have the potential to result in the degradation of the hedgerow plots through maintenance or lack thereof, as they would be in the ownership of residents rather than in the public realm. This is important as the boundaries of burgage plots are survivors from the medieval layout of the town. The inclusion of the apartment buildings enables the retention of the burgage plots in the public domain, allowing for appropriate maintenance.*

*Other developments have taken place in the vicinity of the application site and a development on land to the east is currently under construction. These developments are not adjacent to any of the structures of architectural heritage significance that would be affected by the present proposal and no cumulative effect on architectural heritage is predicted. Similarly, while a number of planning permissions have been granted in the Newcastle area and not yet implemented, none of these would lie between the application site and the four buildings of architectural heritage significance that have been identified in this chapter as being in the vicinity of the application site. None of the extant, but not implemented, planning permissions would add a cumulative effect to that of the present proposal.*

*There will be a moderate residual indirect negative effect on the setting of BH-02, Newcastle Farm, There will be a significant residual indirect negative effect on the setting of BH-03, the tower house."*

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

- 5.111 As noted above, this application is accompanied by an AA Screening Report and by an EIAR. The EIAR has been prepared / coordinated by JSA with an experienced environmental consultancy team, while the AA Screening Report is prepared by Altemar which concludes:

*"Altemar have carried out an appropriate Assessment Screening Report for the proposed project and conclude that no Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the proposed project, the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the settlement of silt over the intervening distance and dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.*

*This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site.*

*On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site. There is no possibility of significant impacts on Natura 2000 sites, features of interest or site specific conservation objectives.*

*Accordingly, having carried out the Stage 1 Appropriate Assessment Screening, the competent authority may determine that a Stage 2 Appropriate Assessment of the Proposed Development is not required as it can be excluded, on the basis of objective scientific information following screening under the Habitats Directive 92/43/EEC (as amended, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on any European site."*

- 5.112 Having regard to the detailed analysis set out above, the applicant has demonstrated that the criteria set out under Section 3.2 of the Guidelines have been appropriately incorporated into the development proposal, as required under SPPR3 (a)

#### **5.4 Design Manual for Urban Roads and Streets (DMURS) (2013)**

- 5.113 The Design Manual for Urban Roads and Streets (DMURS), 2013 (updated in 2019), sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

##### **5.4.1 Evaluation of Consistency**

- 5.114 The DMURS Compliance Statement (technical note) prepared by DBFL Consulting Engineers provides detail in respect of the consistency of the proposed development with DMURS (extract below).
- 5.115 The Technical Note states that *"the proposed residential development is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2019. The scheme proposals are the outcome of an integrated design approach that seeks to implement a sustainable community connected by well-designed streets which deliver safe, convenient, and attractive networks in addition to promoting a real and viable alternative to car-based journeys."*

5.116 According to the DBFL report, maximises connectivity between key local destinations and constructed development through the provision of a high degree of permeability and legibility for all network users particularly for sustainable forms of travel. Accordingly, the proposed residential scheme delivers greater mode and route choices along direct, attractive and safe linkages to a range of amenities and local service destinations.

5.117 Arterial links adjacent to the subject site, include the Athgoe Road to the west and Newcastle Main Street to the north. A Link street will provide access between the Athgoe Road and the Graydon Development. These Arterial links provide important connections with local centres and community infrastructure such as Newcastle Village, schools, public transport connections, retail and sports clubs.

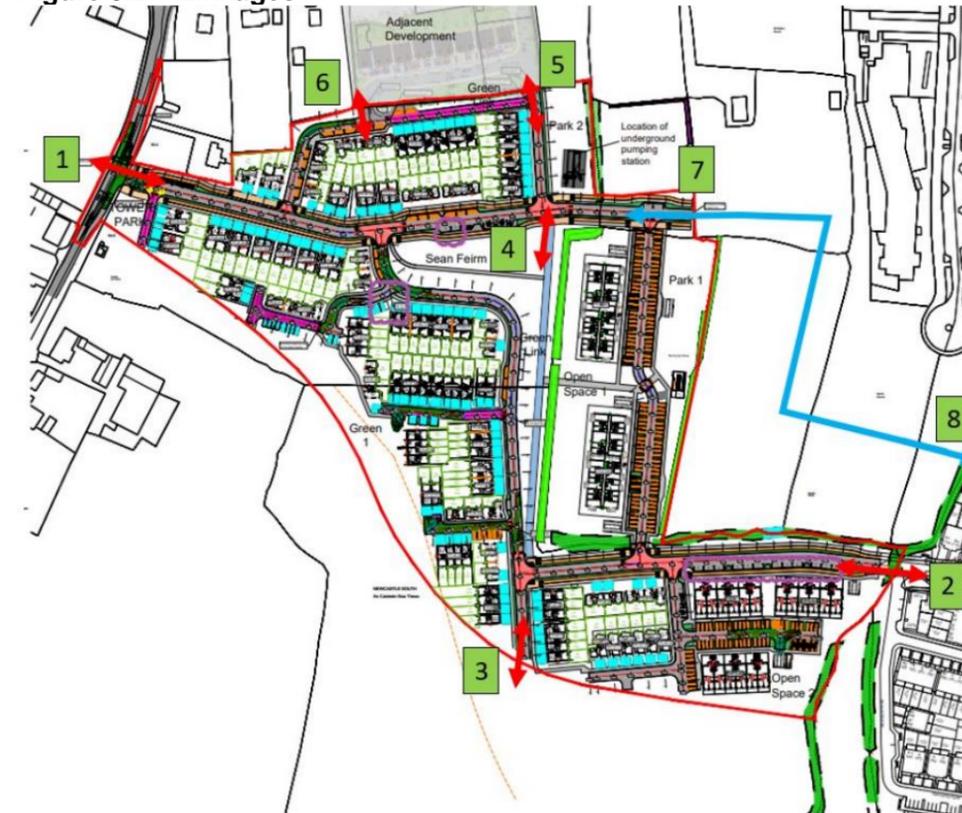
5.118 The internal road network within the site has been designed to deliver a hierarchy of Local streets and Homezones that provide appropriate access within / across the proposed new residential communities and the road network external to the site. The movement function of each internal street network has sought to respect the different levels of motorised traffic and catering for higher number of pedestrians and cyclists. In parallel the adopted design philosophy has sought to consider the context / place status of each residential Local and Homezone street in terms of level of connectivity provided, quality of the proposed design, level of pedestrian / cyclist activity and vulnerable users requirements whilst identifying appropriate 'transition' solutions between different street types.

### Linkages

5.119 The street layout was derived from several factors which include, Local Area Plan, boundary conditions, existing road network, future and existing development and topography. This has led to the creation of a street network that is predominantly a grid pattern with some curvilinear sections in specific areas. As part of the design and development of the street network, cycle and pedestrian linkages were through the development to link the existing Link street provided from Graydon development (Newcastle Boulevard) to the Athgoe Road Arterial route. Below is a figure of the proposed and potential external linkages which are proposed to be facilitated by the subject development

- Link 1 will provide an important vehicular, pedestrian and cycle link between the development and the Athgoe Road.
- Link 2 provide an important vehicular, pedestrian and cycle link between the development and the Graydon development providing a continuation of Newcastle Boulevard.
- Link 3 and 4 will provide cyclist and pedestrian links from the north to the south of the development by way of a 4m wide shared surface "Green link".
- Link 5 and 6 will provide vehicular, cyclist and pedestrian links to the adjoining residential development.
- Link 7 and 8 may provide future vehicular, pedestrian and cyclist access to the Graydon Development which is compatible with the Newcastle LAP roads objective.

Figure 5.2 – Linkages



5.120 The key principle is that the proposed development layout can facilitate enhanced linkages over and above the considerable improvement in permeability through the site arising from the scheme. The linkages detailed above demonstrate that permeability has been considered from a very early stage in the design and all links that can be provided by the applicant, have been accommodated.

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

5.121 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.

#### 5.5.1 Evaluation of Consistency

5.122 The subject proposal includes an amendment to the permitted creche in Graydon to the east to provide an increased size childcare facility of 778 sq. m to serve Graydon and this SHD application. The creche to serve the combined application sites is in response to the commentary contained in the South Dublin County Council Stage 2 report, which commented on the viability of a creche of 300 sq. m previously proposed at pre-application stage.

5.123 The combined Graydon and current SHD comprises:

**Table 5.4 – Combined no. of Units – Creche provision**

	1 bed	2 bed	3 bed	4 bed	5 bed	Overall
Graydon	6	87	237	47	-	377
Current SHD	54	88	112	25	1	280
	60	175	349	72	1	657

Source: Mola

5.124 Excluding the 1 bed units the total of 2-4 bed units is 597, which equates to potential childcare requirement of c. 160 no. children.

5.125 It is estimated that the creche of c. 778 sq. m can cater for in the order of 172 children having regard to an accepted industry average of c. 4-5 sq. m gross floor space (gross) per child (4.5 sq. m) depending on the type of childcare offered by the end user. 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. In this regard flexibility is required in respect to the future fit out and type of childcare facility proposed within the development.

## 5.6 Draft Water Services Guidelines for Planning Authorities 2018

5.126 The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.

5.127 The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.

5.128 The key aims of the Guidelines are to:

- Provide advice to planning authorities on the operational framework within which Irish Water must operate to deliver water services,
- Establish mechanisms for effective engagement between planning authorities and Irish Water across all the relevant functions of planning authorities, and
- Set out how the planning system, in setting out a spatial framework for growth and development, will relate to and inform the planning and delivery of water services by Irish Water at a national, regional and local level.

5.129 The Draft Guidelines state that it is a requirement for Strategic Housing Development applications to contain evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.

5.130 The Draft Guidelines outline that having regard to the views of Irish Water and having satisfied itself "that there is a reasonable prospect of the constraint(s) being addressed within the lifetime of the permission, a planning authority or An Bord Pleanála (in the case of a SHD application) may approve, inter alia, this aspect of the development, subject to a condition that requires the applicant to enter into a connection agreement (s) with Irish Water to provide for a service connection to the public water supply and / or wastewater collection networks, as appropriate."

## 5.6.1 Evaluation of Consistency

5.131 DBFL Consulting Engineers have consulted with Irish Water on the design of the development and a Confirmation of Feasibility and Design Acceptance is included with the SHD application.

## 5.7 Quality Homes for Sustainable Communities – 2007

5.132 The Department's Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities' promotes high standards in the design and construction and in the provision of residential and services in new housing schemes. They encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

### 5.7.1 Evaluation of Consistency

5.133 This SHD application is accompanied by a Housing Quality Assessment, prepared by MOLA Architects, which demonstrates that the proposed houses conform to and exceed the standards set out within the best practice guidelines.

## 5.8 Framework and Principles Protection of the Archaeological Heritage (1999)

5.134 Section 3.5 of the document notes that whenever the archaeological heritage is affected, or proposed to be affected, by development the approach to be followed must be preservation in-situ or preservation by record through archaeological excavation and recording.

5.135 The document sets out that:

*Where archaeological sites or monuments (or portions of such) are to be removed due to development then it is essential that the approach of preservation by record be applied.*

5.136 While the document outlines that there should always be a presumption in favour of avoidance of developmental impacts on the archaeological heritage and preservation in-situ of archaeological sites and monuments must be presumed to be the preferred option, "where archaeological sites or monuments (or portions of such) have to be removed due to development then it is essential that the approach of preservation by record be applied, i.e. that appropriate archaeological excavation and recording take place."

### 5.8.1 Evaluation of Consistency

5.137 As set out in the IAC Cultural Heritage Chapter of the EIAR, the Archaeology Geophysical Testing:

*"revealed a number of features of probable archaeological origin, including an industrial kiln, walls, ditches, metalised surfaces and a pit collectively referred to as Archaeological Area 1 (AA1). Most of the features identified, date from the medieval period and are associated with the recorded tower house complex. In the northern area of the site, the most prominent feature identified was a cereal drying kiln (AA2). The linear field boundary ditches and cultivation furrows identified indicate the presence of a field system in this area. While some features produced some medieval pottery sherds the field system is thought to be post-medieval in date as pottery of that date and ceramic pipes were also identified. While some of these ditches have been manipulated in the recent past, with the insertion of ceramic drainage pipes, others may still maintain their original fabric. A pit of*

*probable archaeological significance was identified in the centre of the site with a possible associated linear ditch of unknown date (AA3). In the eastern area, the only feature of archaeological significance identified was a large burnt mound spread (AA4)."*

5.138 The EIAR notes the following mitigation

*Whilst it is acknowledged that the preservation in-situ of archaeological remains is considered the best practise with regards to conserving the archaeological resource, the required layout of the development (and the attenuation requirements located within greenfield areas) means that the archaeological features and deposits within AA1-4 will be subject to archaeological preservation by record (prior to the commencement of construction). This will be carried out under licence to the National Monuments Service of the DoHLGH. Full provision will be made available for the resolution of the archaeological remains, both on site and during the post-excavation process.*

*All topsoil stripping will be subject to archaeological monitoring by a suitably qualified archaeologist. Should any archaeological remains be identified, consultation will be required with the National Monuments Service of the DoHLGH as to whether preservation by record or in-situ is carried out.*

*No mitigation is required along the existing haulage road or within the south-eastern section of the development area as these areas have already been subject to full archaeological excavation and preservation by record.*

5.139 The residual impacts are outlined as follows:

*"Following implementation of mitigation measures, no significant negative impacts are predicted upon the archaeological resource. There will be a residual indirect moderate negative impact on the recorded tower house, due to the effects the development will have on the setting of the structure.*

## **5.9 Architectural Heritage Protection Guidelines for Planning Authorities (2011)**

5.140 The AHPG (2011) note that: *"The extent of the potential impact of proposals will depend on the location of the new works, the character and quality of the protected structure, its designed landscape and its setting, and the character and quality of the ACA. Large buildings, sometimes at a considerable distance, can alter views to or from the protected structure or ACA and thus affect their character. Proposals should not have an adverse effect on the special interest of the protected structure or the character of an ACA."*

5.141 The Architectural Heritage Chapter of the EIAR notes that:

*"No mitigation is required to reduce the indirect effect on the setting of Newcastle Farm at operational phase other than good quality design of the boundary to Athgoe Road.*

*No mitigation is possible to reduce the indirect effects of the proposed development on the setting of the tower house at BH-03 other than the designed layout of the proposed development to keep houses back from the area immediately to the front of the tower house. This has included a restriction in height of the proposed houses nearest to the tower house to two storeys in addition to setting the houses back from the street and from the vicinity of the tower house. There will be a moderate residual indirect negative effect on the setting of BH-02, Newcastle Farm, There will be a significant residual indirect negative effect on the setting of BH-03, the tower house.*

5.142 With reference to the ACA, the Architectural Heritage Chapter outlines that:

*"It is noted that the inclusion of the 2 five-storey apartment buildings and the 3 three-storey duplex buildings, will not result in any additional negative indirect effects on the tower house, Newcastle Farm or the*

*architectural conservation area over and above the potential operational phase effects arising from the development of the lands in accordance with the layouts and scale, massing etc, envisaged in the Newcastle LAP, as those heritage elements are at a distance from the proposed buildings, as outlined above in section 14.6.*

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

5.143 The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

### **5.10.1 Evaluation of Consistency**

5.144 We refer the Board to the Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers which concludes:

*"The Site Specific Flood Risk Assessment for the proposed development was undertaken in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities", November 2009. Following the flood risk assessment stages it was determined that the Site is within Flood Zone C as defined by the Guidelines. It is concluded that the;*

- Residential development proposed is appropriate for the Site's flood zone category.*
- Planning System and Flood Risk Management Guidelines Sequential Approach is met and the 'Avoid' principal achieved.*
- A Justification Test is not required as the site is in Flood Zone C. The development was concluded as having a good level of flood protection up to the 100 year return event. For pluvial floods exceeding the 100 year capacity of the drainage system then proposed flood routing mitigation measures are recommended."*

**6.0 CONSISTENCY WITH DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028**

- 6.1 The site is located within the administrative area of South Dublin County Council. The proposed material amendments to the Draft Plan were published on the 29<sup>th</sup> of March 2022.
- 6.2 When the Board come to determine the application the 2022-2028 Development Plan is likely to be the relevant Development Plan for the purpose of assessing the application. Accordingly, the proposed development has been assessed against the policies and objectives contained in the 2022-2028 Development Plan.
- 6.3 The Draft CDP identifies Newcastle as a Self-Sustaining Growth Town in the County Settlement Hierarchy. The following policies and objectives for Newcastle, as a Self-Sustaining Growth Town, are noted:

Policy CS9: Newcastle
Support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels.
<b>CS9 Objective 1:</b> To ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.
<b>CS9 Objective 2:</b> To support well designed infill and brownfield development on zoned lands along the main street, in particular where it provides for improved services, commercial, retail or mixed use provision to meet the needs of the growing population.
<b>CS9 Objective 3:</b> To proactively support and promote the highest appropriate levels of services, social infrastructure, facilities, retail, open space amenity and economic activity to meet the needs of current and future growth in line with the scale and function of Newcastle within the settlement hierarchy.

- 6.4 The proposed development will “*support the sustainable long-term growth*” of Newcastle through its delivery of new residential accommodation within the current settlement boundary and on infill, brownfield lands that are contiguous to the town centre which shall be able to provide more than adequate retail, commercial and other community services and facilities to the future residents of the scheme.
- 6.5 The Core Strategy table of the Draft Plan has a target of 325,423 no. persons for 2028. For Newcastle the Core Strategy indicates 25.81 hectares of land along with some 398 no. units for the period 2022-2028.
- 6.6 The proposed development of 280 no. dwellings will contribute towards the achievement of the dwelling target for Newcastle.

**6.1 Relevant Policies – Core Strategy**

**Table 6.1 – Consistency with Core Strategy**

Policies/Objectives Core Strategy	Consistency
Policy 3: Monitoring Population and Housing Growth Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin.	The proposed development of 280 no. dwellings will contribute towards the achievement of the dwelling target for Newcastle.
CS3 Objective 6 To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.	The proposed development which includes a creche along with open space areas identified in the LAP. The under construction ‘Graydon’ development by Cairn provides for the reservation of a school site within the development which will be made available to the Department of Education as required. The adjoining Graydon development by Cairn includes some 3.8 hectares of open space. Some elements of the Open space areas identified in the Newcastle LAP are located on either contested lands or on lands owned by Third Parties (including the Department of Education). The Material Contravention Statement, prepared by JSA provides a justification.
CS6 Objective 3 Promote compact growth and support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes within or contiguous to the CSO defined settlement boundaries (Consistent with NPO 3b and RPO 3.2)	The proposed development will promote a compact form of development contiguous to development to the north and to the east.
CS6 Objective 4 To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.	The proposed development proposes a 33.1 units per hectare Gross (37.1 net), with the higher density element (apartments) located closer to the town centre, and lower density development in the remaining portion of the subject lands.
CS6 Objective 5 To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally-accessible street environment for pedestrians and cyclists, where adequate transport links	The layout of the proposed development has been designed in accordance with DMURs and includes a green link as well as cycle and footpaths linked to the Main Street to the north and Graydon to the east.

Policies/Objectives Core Strategy	Consistency
are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which need them.	
CS6 Objective 6 To support, through the compact growth model in the Core Strategy and settlement strategy and by ensuring population growth and plot densities are sustainable, the just transition to a climate resilient, biodiversity-rich, environmentally sustainable and carbon neutral economy before 2050	CS6 Objective 4 and the proposed development which includes a high quality range of open spaces, in a permeable development located within Newcastle will support an environmentally sustainable development.
Policy 9: Newcastle Support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels	As per CS6 Objective 4 & CS3 Objective 6
CS9 Objective 1 To ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.	See response CS3 Objective 5. The Material Contravention Statement, prepared by JSA provides a justification.
CS9 Objective 3 To proactively support and promote the highest appropriate levels of services, social infrastructure, facilities, retail, open space amenity and economic activity to meet the needs of current and future growth in line with the scale and function of Newcastle within the settlement hierarchy.	The proposed development includes a creche, open space, and the Graydon Development (under construction by Cairn) includes a site reserved for a primary school along with c. 3.8 hectares of open space. It is noted a retail development is currently under construction to the north of Graydon.

and services. Such measures shall be delivered through appropriate phasing in line with CS9 SLO1, SLO2, SLO3 and SLO4.

CS9 SLO3: A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described

- 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south
- 2) Urban Park/Square c. 1ha in size (Burgage South Park),
- 3) East-West Link Street,
- 4) Sean Feirm Park c. 0.2ha in size,
- 5) a portion of Tower House Park c. 0.1ha.

All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.

With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.”

6.10 With reference to the above, the proposed development contravenes CS9 SLO3 and the context is set out below and also a justification is provided in the Material Contravention Statement, prepared by John Spain Associates, submitted with the application. The following provides some commentary:

**CS9 SLO3 (1) Taobh Chnoic Park**

6.11 With reference to CS9 SLO3 (1), it is noted that the ownership of the remainder of the Taobh Chnoic Lands in LAP area are in dispute, and not within our client’s ability to include in a planning application. As part of the permitted ‘Graydon’ development by Cairn provides for the delivery of 3.9ha of open space providing a range of spaces and plan areas and experiences, which includes the eastern portion of Taobh Chnoic (some 2.7 hectares), detailed below.

**Figure 6.1 – Eastern Portion of Taobh Chnoic Park**



6.7 It is noted the Draft Plan including material amendments notes that:

*“The growth in Newcastle is mainly focused on the adopted Local Area Plan. The overarching principle for the town is to improve the social and physical services in tandem with a phased approach to development to provide for the growing population. A phased sequential approach to development from the village core to the north and south recognises the ongoing construction activity and the delivery of key infrastructure identified in the Newcastle Local Area Plan.”*

6.8 The proposed development is sequentially located to St. Finian’s way along the northern boundary and also to the east at Graydon. Further (contested ownership) lands are located to the north east of the subject lands, where access to the boundary is provided should they come to be developed.

6.9 The proposed amendment no. 2.12 (New CS9 Objective 4) seeks the following:

New CS9 Objective 4, CS9 SLO1, CS9 SLO2, CS9 SLO3, CS9 SLO4 to be added to read:

*“CS9 Objective 4: To facilitate and commit to the delivery of new residential development in a coordinated manner, ensuring alignment with investment infrastructure and supporting amenities*

**Figure 6.2 – Graydon Development with Open Space Areas**



6.12 It is noted CS9 SLO3: 5 (in respect of Tower Park) recognises that ownership effectively determines the ability of an applicant to deliver certain elements of infrastructure. The proposal provides a Tower Park within the application lands. Adjacent, on lands outside the application (and ownership of the applicant), the LAP identifies further lands for development.

6.13 It is evident that CS9 SLO3 1) is not capable of implementation due to ownership as the western portion of the Taobh Chonaic lands are not within Cairn’s control to deliver in a planning application.

**CS9 SLO3 2) Urban Park/Square c. 1ha in size (Burgage South Park).**

6.14 It is noted the majority of the Burgage South Park Lands are under the ownership of the Department of Education. Cairn delivered a portion the Burgage South Park Lands on the eastern side of the park as part of the Graydon Development. However as can be seen from the graphic below, St. Finian’s School (Building and road including roundabout), encroaches significantly into Burgage South Park.

**Figure 6.3 – Land Ownership – Burgage Park South**



6.15 Cairn has provided c. 0.19 hectares of Burgage South Park as part of the Graydon application (see above). It is further noted that the north eastern portion of the Burgage South Park was permitted under an adjoining development to the north. However, the remainder of the lands are under the ownership of the Department of Education and Skills and therefore not within Cairn’s control to deliver as part of any future planning application. In addition it is noted a portion of the as constructed Primary school and associated roundabout and access road encroaches onto the area designated as Burgage Park South. In this regard, the Burgage Park South is not capable of being delivered in the form envisaged.

**CS9 SLO3: 3) East-West Link Street.**

6.16 With reference to the East-West Link Street, this SHD application will link to Graydon to the east under construction which will provide the east west link street.

**CS9 SLO3: 4) Sean Feirm Park c. 0.2ha in size,**

6.17 Cairn has an excellent track record of delivering high quality interconnected open spaces within their developments. Sean Feirm park is to be delivered as part of this SHD application.

**CS9 SLO3: 5) a portion of Tower House Park c. 0.1ha.**

6.18 It is noted the layout includes a portion of open space (c. 472 sq. m) adjacent to the Tower House Park as it relates to their landholding. The Tower Park in the LAP is located on lands outside the ownership of Cairn.

**CS9 SLO3: Remainder of Text**

*All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.*

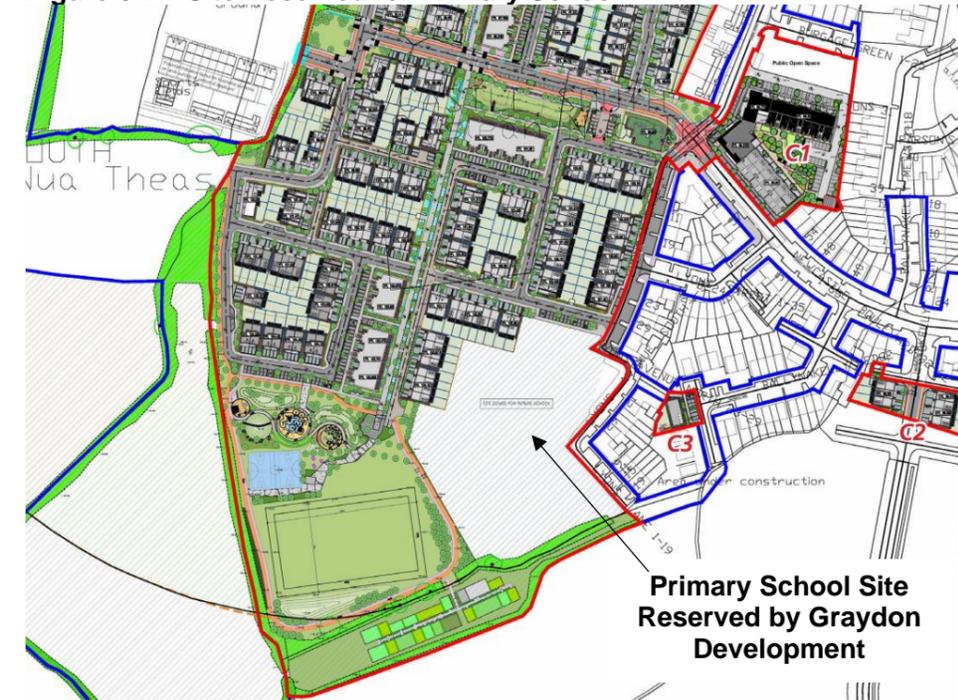
6.19 Cairn have already provided a north south link to the Main Street as part of the Graydon Development. The current proposal will be able to connect through St. Finian’s way. It is noted that the Taken in Charge drawings relating to the road network in St. Finian’s way indicated that the link will be taken in charge and as such capable of being delivered. Additional detail on connections is provided in the DBFL DMURs Technical Note.

6.20 The Draft Plan further notes:

*“With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.”*

6.21 As part of the Graydon Development, our client has reserved a site for the provision of a new primary school (see extract below).

**Figure 6.4 – Site Reserved for Primary School**



6.22 CS9 SLO4 seeks:

*“To commit to only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.”*

6.23 With reference to the above, we would note that there are no Phase 2 residential lands identified on the land use zoning maps. As noted above, the ownership of the 1.4 hectares relating to the remainder of Taobh Chnoic Park is currently in dispute. An east west link street is provided in the current SHD (to connect to Graydon to the east). The link in the LAP, to the north is not on Cairn Lands (it runs across the Department of Education lands), and outside the control of Cairn to deliver.

**6.2 Land Use Zoning**

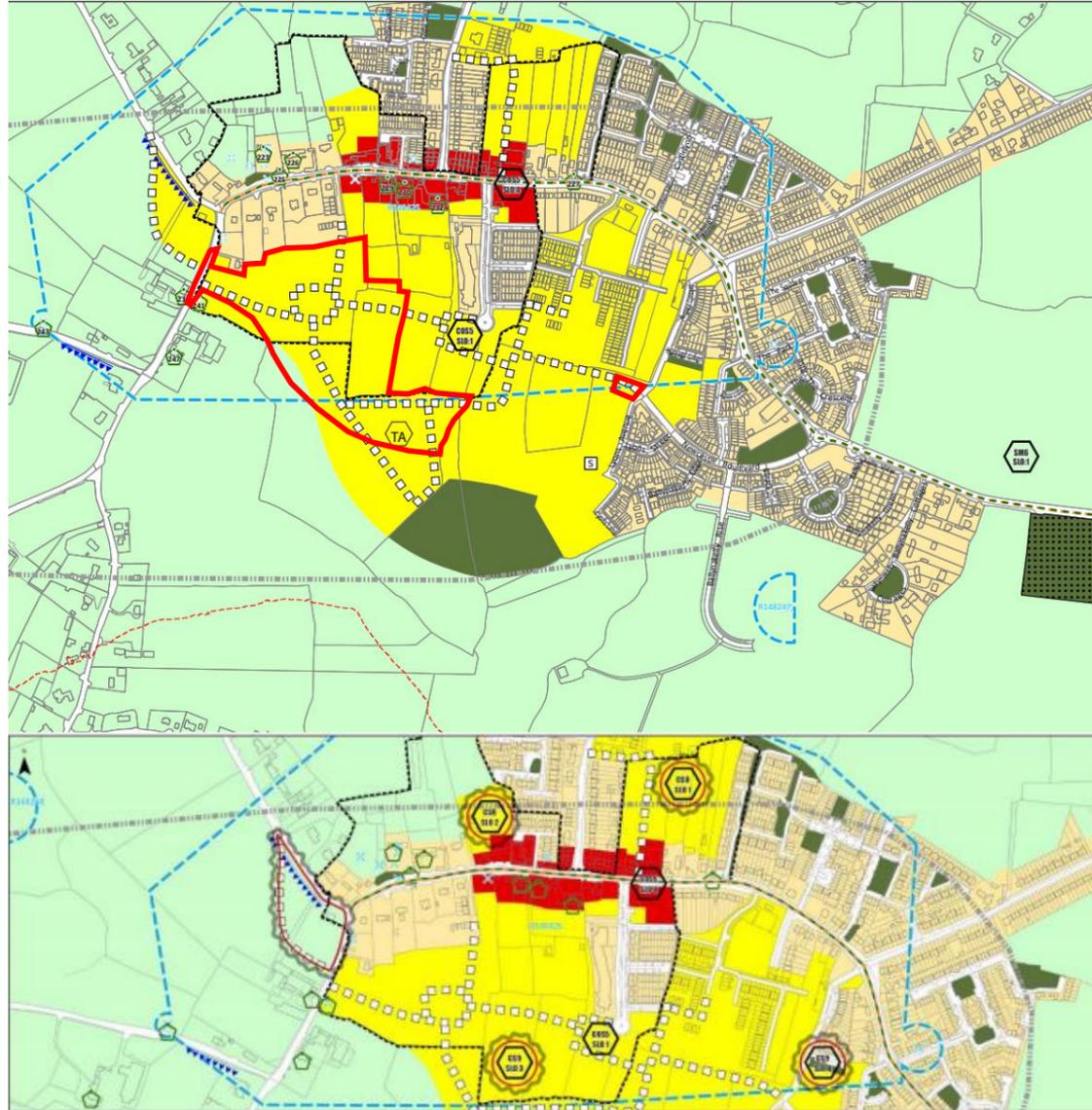
6.24 The relevant development plan is the South Dublin County Development Plan 2016 – 2022. The subject site is zoned ‘Objective RES-N’ - ‘To provide for new residential communities in accordance with approved area plans’.

6.25 Residential and Traveller Accommodation is a “permitted in principle” use.

6.26 A small portion of the subject lands (relating to open space along the southern boundary) are zoned ‘Objective RU’, ‘To protect and improve rural amenity and to provide for the development of agriculture.’ Open Space is a “permitted in principle” use. A small portion of the open space for the development is located on the RU objective.

6.27 The location of the site in the context of the land use zoning objectives map within the Development Plan is illustrated below, with the site outlined in red.

**Figure 6.5 – Land Use Zoning Map (South Dublin Draft County Development Plan)**



(includes Material Amendments March 2022)

USE ZONING OBJECTIVES	
	Objective RES To protect and/or improve residential amenity
	Objective RES-N To provide for new residential communities in accordance with approved area plans
	Objective VC To protect, improve and provide for the future development of Village Centres
	Objective OS To preserve and provide for open space and recreational amenities
	Objective RU To protect and improve rural amenity and to provide for the development of agriculture and Dublin Mountains areas

	Proposed School
	Specific Local Objectives
	To Provide For Traveller Accomodation (indicative sites)
	Contour Lines
	NTA Greater Dublin Cycle Network Plan
	Road Proposals - 6 Year
	Protect and Preserve Significant Views
	Sites and Monuments Record Zone of Notification

### 6.3 Chapter 3 - Natural, Cultural and Built Heritage Relevant Policies

**Table 6.2 – Consistency with Relevant Policies for Natural, Cultural and Built Heritage**

Policies/Objectives Natural, Cultural and Built Heritage	Consistency
<p>Policy 1: Overarching Protect, conserve and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.</p>	<p>An AA screening and Biodiversity Chapter of the EIA is included with the application. Measures to improve biodiversity on site are contained in the landscaping proposals</p>
<p>NCBH 1 Objective 1 To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and developments.</p>	<p>The proposed development incorporates the Burgage plot boundaries into the development layout and green infrastructure.</p>
<p>NCBH 2 Objective 2 To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation.</p>	<p>We refer the Board to the AA Screening by Altemar, which concludes that <i>“On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.”</i></p>
<p>NCBH 2 Objective 3 To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as ‘stepping stones’ for the purposes of green infrastructure and Article 10 of the Habitats Directive</p>	<p>As per NCBH 2 Objective 2 response above.</p>
<p>Policy 3: Natura 2000 Sites (NCBH 3 Objective 1, NCBH 3 Objective 2, NCBH 3 Objective 3) Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</p>	<p>As per NCBH 2 Objective 2 response above.</p>
<p><b>NCBH2 Objective 4:</b> To protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the river.</p>	<p>As per NCBH 2 Objective 2 response above.</p>
<p>Policy 5: Protection of Habitats and Species Outside of Designated Areas Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected</p>	<p>We refer the Board to the Biodiversity chapter of the EIAR and the Tree Survey. The significant hedgerows are being incorporated into the design of the proposed development allowing for connected wildlife corridors.</p>
<p>NCBH 5 Objective 1 To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals</p>	<p>We refer the Board to the Biodiversity chapter of the EIAR and the Tree Survey. The significant hedgerows are being incorporated into the design of the proposed development allowing for connected wildlife corridors. Additional planting is proposed in the Landscape Masterplan by Murray Associates.</p>
<p>NCBH 5 Objective 2 To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals</p>	<p>We refer the Board to the Biodiversity Chapter of the EIAR which proposes appropriate mitigation for protected species and features of biodiversity importance within the subject site.</p>
<p>Policy 13: Archaeological Heritage Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p>	<p>Careful consideration has been given to the location of the Tower House where the proposed entrance has been moved further to the north and an additional open space area is provided to mitigate the potential impacts on the protected structure. We refer the Board to the Cultural Heritage (Architectural Heritage) section of the EIAR submitted with the SHD application.</p>
<p>NCBH 13 Objective 1 To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document.</p>	<p>Some underground features AA1 (medieval and post medieval remains adjacent to tower house DU020-003007), AA2 (Kiln), AA3 (undated linear feature) and AA4 (burnt mound) were discovered as part of the excavations undertaken. The archaeological features and deposits within AA1-4 will be subject to archaeological preservation by record (prior to the commencement of construction). This will be carried out under licence to the National Monuments Service of the DoHGLH.</p>
<p>NCBH 13 Objective 2 To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects.</p>	<p>Some underground features AA1 (medieval and post medieval remains adjacent to tower house DU020-003007), AA2 (Kiln), AA3 (undated linear feature) and AA4 (burnt mound) were discovered as part of the excavations undertaken. The archaeological features and deposits within AA1-4 will be subject to archaeological preservation by record (prior to the commencement of construction). This will be carried</p>

Policies/Objectives Natural, Cultural and Built Heritage	Consistency
	out under licence to the National Monuments Service of the DoHLGH. A justification is provided in the Material Contravention Statement.
NCBH 13 Objective 3 To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.	Careful consideration has been given to the location of the Tower House where the proposed entrance has been moved further to the north and an additional open space area is provided to mitigate the potential impacts on the protected structure. We refer the Board to the Cultural Heritage (Architectural Heritage) section of the EIAR submitted with the SHD application. A Justification is provided in the Material Contravention Statement.
Policy 14: Landscapes Preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.	The Landscape Character Assessment of South Dublin (2021) identifies the Newcastle Lowlands overall landscape character sensitivity as medium, with overall visual and landscape sensitivity as being medium. Landscape values within the Newcastle Lowlands Character Area are noted as being medium/high. The proposed development is located within the development boundary of Newcastle and has been sensitively designed so that the visual impact of the proposal has been mitigated through careful siting of the apartment buildings centrally within the site.
NCBH 14 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).	As per Policy 14: above.
NCBH 14 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	As per Policy 14: above and the LVIA Chapter of the EIAR which provides an assessment of the proposed development.
NCBH 14 Objective 3 To ensure that development respects and reinforces the distinctiveness and uniqueness of the Landscape Character Types and retains important characteristics such as habitats, landform, vernacular heritage and settlement patterns	As per Policy 14: above and the LVIA Chapter of the EIAR which provides an assessment of the proposed development. The proposed development retains the Burgage plots within the development layout.
NCBH 14 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.	The EIAR includes a LVIA which proposes appropriate mitigation.
Policy 19: Protected Structures Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly	Careful consideration has been given to the location of the Tower House where the proposed entrance has been moved further to the north and an additional open space area is provided to mitigate the potential impacts on the protected structure. We refer the Board to the Cultural Heritage (Architectural Heritage) section of the EIAR submitted with the SHD application.
NCBH 19 Objective 1 To ensure the protection of all structures (or parts of structures) and their immediate surroundings including the curtilage and attendant grounds of structures identified in the Record of Protected Structures.	Response as per Policy 19.

#### 6.4 Chapter 4 Green Infrastructure Relevant Policies

**Table 6.3 – Consistency with Relevant Policies for Green Infrastructure**

Policies/Objectives Green Infrastructure	Consistency
GI Vision Promote the development of an integrated GI network for South Dublin working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change and enabling the role of GI in delivering sustainable communities to provide environmental, economic and social benefits.	We refer the Board to the Biodiversity chapter of the EIAR and the Tree Survey. The significant hedgerows are being incorporated into the design of the proposed development allowing for connected wildlife corridors. The objective is to retain as many trees as possible including the Burgage plot system, which is incorporated into the design.
Policy 1 – Overarching Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.	Response as Per GI Vision above.
GI 1 Objective 1 To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki -Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use	Response as Per GI Vision above.

Policies/Objectives Green Infrastructure	Consistency
plans and development in the County.	
GI 1 Objective 4 To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.	Response as Per GI Vision above.
GI 1 Objective 7 To develop linked corridors of small urban 'Miyawaki' native mini-woodlands, a minimum of 100sqm in size, to capture carbon and encourage biodiversity in suitable existing built-up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate	Response as Per GI Vision above.
Policy 2 - Biodiversity Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the East Region Spatial and Economic Strategy (RSES)	Response as Per GI Vision above.
GI 2 Objective 2 To Protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and replacing where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.	Response as Per GI Vision above.
GI 2 Objective 4 To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this chapter.	Response as Per GI Vision above.
GI 2 Objective 5 To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.	Response as Per GI Vision above.
Policy 4 - Sustainable Urban Drainage Systems Require the provision of Sustainable Urban Drainage Systems (SUDS) in the County and maximise the amenity and biodiversity value of these systems.	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 4 Objective 1 To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 4 Objective 2 To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 4 Objective 3 To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.	The landscaping proposals include a series of open spaces of different sizes which include provision for ecology and SUDs within the design.
GI 4 Objective 5 To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 4 Objective 6 To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 5 Objective 1 Protect and enhance the rich biodiversity and eco-systems in accordance with the ecosystem services approach to development enabling mitigation of climate change impacts, by absorbing excess flood water, providing a buffer against extreme weather events, absorbing carbon emissions and filtering pollution.	The landscaping proposals include a series of open spaces of different sizes which include provision for ecology and SUDs within the design.
GI 5 Objective 7 Require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDs strategy development	Green roofs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
GI 6 Objective 1 To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses (See Chapter 8 Community and Public Open Space).	The proposed development will provide for a connected series of public open spaces and amenity Green Infrastructure areas with multiple uses as well as a clear hierarchy from the larger Sean Feirm Park to other parks (Tower Park) at the entrance on Athgoe Road measuring c 1.71 hectares. The proposed open space for the development at 20.2% therefore meets and exceeds the open space requirements as set out in the Draft Development Plan (15%). A green route and cycle ways are provided within the layout.
GI 6 Objective 4 To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 Community and Public Open Space of this Development Plan and South Dublin County's Parks and Open Space Strategy	The landscaping proposals include a series of open spaces of different sizes of some 20.2% of the overall site area
GI 6 Objective 5 To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.	The proposal includes a green route, pedestrian connections along a GI corridor centrally within the site which has taken into account the ecological functions of the corridors.
GI 6 Objective 6 To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3 Heritage	The lighting scheme designed by Sabre has taken into account Bat mitigation requirements of Altemar.
GI 6 Objective 10 To continue to protect and promote existing allotments and provide for new allotments where feasible in accordance with a review of the provision and management of allotments across the County	Allotments form part of the Graydon development by Cairn located to the east.

Policies/Objectives Green Infrastructure	Consistency
GI 7 Objective 1 To protect, conserve and enhance natural, built and cultural heritage features and restrict development that would have a negative impact on these assets in accordance with the provisions of Chapter 3 Natural, Cultural and Built Heritage of this Plan	The proposal retains the Burgage Hedgerow plot located centrally in the site through careful design.
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, in accordance with the provisions of the Landscape Character Assessment of South Dublin County and the provisions of Chapter 3 of this plan	<p>We refer the Board to the LVIA contained in the EIAR which confirms that <i>"In the long term, the landscape effects due to the completed development would overall be not-significantly negative, considering the existing residential zoning designation within the Newcastle LAP (2012) against the change in character of the site and the removal of existing vegetation. The high-quality landscape treatments within the development and the additional ameliorative native planting to the existing hedgerow goes some way towards mitigating the negative effect.</i></p> <p><i>In the longer term, the assessment concludes that there will be some moderately negative visual effects to receptors immediately adjacent to the north-east of the site, with slight or not significant negative and imperceptible visual effects to the remaining residential receptors to the east, south and west."</i></p>

## 6.5 Chapter 5 - Quality Design and Healthy Place-making Relevant Policies

**Table 6.4 – Consistency with Relevant Policies for Quality Design and Healthy Place-making**

Policies/Objectives Quality Design and Healthy Place-making	Consistency
Policy 1 - Quality Design and Healthy Place-making (QDP) Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.	Compliance with the Section 28 Guidelines referenced has been set out above. The proposed development includes a creche and will provide a series of open spaces. The adjoining Graydon development has reserved a primary school site. The layout connects to existing and under construction (supermarket) on the main street.
QDP1 Objective 1 To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).	The proposed development will contribute to a sustainable community with access to local services and compliance with the SRD 2009 is set out above in Section 5.1.
QDP1 Objective 6 To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy toward delivery of long-term sustainable communities.	The design of the proposed development will provide an inclusive, safe, resilient and sustainable neighbourhood in accordance with the NPF and RSES.
Policy 2 Overarching - Successful and Sustainable Neighbourhoods Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and functional places to live, work, visit, socialise and invest in throughout the County.	Please see Design Statement by MOLA included with the SHD application and below in section 6.13.
QDP2 Objective 1 To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed, and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal	Please see Design Statement by MOLA included with the SHD application.
QDP3 Objective 1 To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 Implementation & Monitoring in relation to design statements.	Please see Design Statement by MOLA included with the SHD application.
QDP3 Objective 2 To protect and conserve the special character of the historic core of the villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of each village informs the design approach to new development, infrastructure and renewal, recognising the particular character and context in Architectural Conservation Areas (ACAs).	The layout of the proposed development has taken into account the Burgage Plots in Newcastle as well as the archaeological and Architectural heritage. The Cultural Heritage Chapters of the EIAR provides further detail.
QDP3 Objective 6 To ensure that higher Buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that may have on existing communities to ensure consistency with regard to Healthy Placemaking	Please see Design Statement by MOLA included with the SHD application. The 2 no. 5 storey apartment buildings are located centrally with the scheme within the Burgage Plot. A sunlight/daylight report prepared by 3D Design Bureau is included with the application. Adjoining residences will not be materially impacted on by the proposed development.
QDP3 Objective 8 To include a reasonable height in heritage villages and that this is in line with current buildings and is sympathetic to the makeup of these heritage villages	See response to QDP3 Objective 6 above.
Policy 4 - Healthy Placemaking Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.	The proposed development includes a creche and will provide a series of open spaces. The adjoining Graydon development has reserved a primary school site. The layout connects to existing and under construction (supermarket) on the main street.
QDP4 Objective 1 To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and infrastructure in line with the provisions of NPO 4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES..	The proposed development includes a creche and will provide a series of open spaces. The adjoining Graydon development has reserved a primary school site. The layout connects to existing and under construction (supermarket) on the main street.

Policies/Objectives Quality Design and Healthy Place-making	Consistency
	The density of 33.1 units per hectare Gross (37.1 net) makes efficient use of land and infrastructure.
QDP4 Objective 2 To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction	The proposed development includes a series of public open spaces distributed evenly throughout the subject site, which are overlooked; with passive surveillance incorporated into the design.
Policy 5 - Connected Neighbourhoods Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities	The adjoining Graydon development has reserved a primary school site. The layout connects to existing and under construction (supermarket) on the main street. The density of 33.1 units per hectare Gross (37.1 net) makes efficient use of land and infrastructure.
QDP5 Objective 2 To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.	Pedestrian and cycle links are provided throughout the design of the proposed development. East west (to Graydon) and north south permeability (to St. Finian's Way) is provided
QDP6 Objective 6 To ensure that all new developments but particularly apartment developments were gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, mentally and physically.	The proposed development includes communal open space
QDP6 Objective 7 To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge	We refer the Board to the Murray Associates drawing 1855_PL_P_03.2 which details the boundary treatment in the scheme.
Policy 7 - High Quality Design – Development General To promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.	The design of the proposed development is of a high quality with interconnected sustainable neighbourhoods as set out in the MOLA Design Statement.
QDP7 Objective 1 To actively promote high quality design through the policies and objectives which form 'The Plan Approach' to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County's Building Height and Density Guide.	The design of the development has had regard to 'the Plan Approach' as set out in the MOLA Architectural Design Report and below.
QDP7 Objective 2 To actively promote well-designed streets and public spaces that provide for active frontages and 'live' edges that feel safe, secure and attractive for all to use.	The design of the development addresses the streets and open spaces to provide active frontage, along with passive surveillance throughout.
QDP7 Objective 5 To ensure that development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines on Quality Housing for Sustainable Communities, DEHLG (2007), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), or any superseding guidelines, including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).	Section 5 above includes detail on consistency with the relevant Section 28 Guidelines.
QDP7 Objective 8 To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.	Please see Design Statement by MOLA included with the SHD application.
QDP7 Objective 9 To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin Height and Density Guide (Appendix X) and the Urban Design Manual – A Best Practice Guide' (2009) and the guidance on Lifetime Homes as set out in the 'Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).	Section 5 above includes detail on consistency with the relevant Section 28 Guidelines. Please see Design Statement by MOLA included with the SHD application
QDP7 Objective 10 To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.	Please see Architectural Design Report prepared by MOLA included with the SHD application.
QDP7 Objective 11 To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county	The proposed development includes a range of dwelling types including house, duplex apartments and apartments, providing a mix of units within each typology. The proposal will provide Part V in accordance with the Planning and Development Act 2000 (As amended). In addition, in consultation with South Dublin County Council's Housing Department suitably designed accommodation to satisfy the Traveller Accommodation Objective has been provided in the southern part of the site. A response is also provided in the John Spain Associates An Bord Pleanála Response document.
Policy 8 - Building Height and Density Guide Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin Building Heights and Density Guide 2021.	The information set out in Appendix 10 of the draft Development Plan is contained within the Architectural Design Report, prepared by MOLA. The proposal, it is submitted, is compliant with the UDBHG 2018 and the South Dublin Building Heights and Density Guide 2021.
QDP8 Objective 1 Assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).	The information set out in Appendix 10 of the draft Development Plan is contained within the Architectural Design Report, prepared by MOLA.

Policies/Objectives Quality Design and Healthy Place-making	Consistency
QDP8 Objective 2 In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) and the 'Urban Design Manual – Best Practice Guidelines (2009)', where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin Building Height and Density Guide that it is contextually appropriate to do so.	As per QDP8 Objective 1 above and the subject lands are zoned Res-N and as such the proposed heights of 2,3 and 5 storeys are in accordance with NPO35, SPPR1 and SPPR3.
Policy 10 - Mix of Dwelling Types Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.	The proposed development provides a wide range of unit types comprising, houses, duplex apartments and apartment dwellings.
QDP10 Objective 1 To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028 <b>Proposed change as part of Material Amendments:</b> To ensure that <b>all</b> new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.	The proposed development provides a wide range of unit types comprising, houses, duplex apartments and apartment dwellings. It is noted 49.2% of all dwellings are 3 bedrooms or greater.
QDP10 Objective 2 To ensure that our ageing society is catered for in a choice of housing provision having regard to South Dublin Age Friendly County Strategy and Age Friendly Ireland's Principle and Guidelines for the Planning Authority (2021).	The proposed development includes ground floor apartments in the 2 no. apartment buildings and 3 no. duplex apartment blocks which are suitable for older persons. Additional detail is provided in the MOLA Universal Access Statement and Architectural Design Report.
Policy 11 - Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency	The proposed development proposes a high quality palette of materials which are set out in the MOLA Architectural Design Report.
QDP11 Objective 1 To require the use of high quality and durable materials and finishes that make a positive contribution to placemaking	The proposed development proposes a high quality palette of materials which are set out in the MOLA Architectural Design Report.
QDP14 Objective 1 To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines.	The proposed development delivers key elements of the Local Area Plan for Newcastle. The scheme however is not compliant with the Density and Height Policies as well as the road layout contained in the LAP, but is with the relevant policies in relation to density and height in the Development Plan and Ministerial Guidelines.  A justification is set out in the material contravention statement.

## 6.6 Chapter 6 - Housing Strategy

**Table 6.5 – Consistency with Relevant Policies for Housing Strategy**

Policies/Objectives Housing Strategy	Consistency
H1 Objective 3 To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.	The proposed development includes ground floor apartments in the 2 no. apartment buildings and 3 no. duplex apartment blocks which are suitable for older persons. In addition, in consultation with SDCC Housing Department, some specific Traveller Accommodation is provided. Cairn have been in discussions with the Housing Department of South Dublin County Council and suitable housing has been included in the Part V proposals. A letter from South Dublin County Council confirming acceptability of the proposals is included with the application. Furthermore Part V proposals are included with the SHD application. The proposed development provides 19.2 % 1 bedroom (apartments), 31.4 % 2 bedroom dwellings, 40% 3 bedroom dwellings, 8.9% 4 bedroom dwellings and 0.3% 5 bedroom dwellings.
H1 Objective 8 To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the town boundaries suited to their strategic regional role, subject to good design and development management standards being met	The proposed development will be undertaken contiguous and sequentially to Graydon (under construction to the east and to St. Finian's Way to the north).
H1 Objective 13: Proposals for residential development shall provide a minimum of 30% 3-bedroom units, that a lesser provision may be acceptable where it can be demonstrated that: • there are unique site constraints that would prevent such provision; or • that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or • the scheme is a social and/or affordable housing scheme	The proposed development provides 49.2% 3 bedroom units+, in a combination of 3, 4 and 5 bedroom units.
H1 Objective 14 Support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.	Please see response to H1 Objective 3 above.
H4 Objective 2 To ensure that Traveller Accommodation is located in proximity to services, including public transport, schools, GPs. shops, playgrounds and sports clubs.	Please see response to H1 Objective 3 above.
H4 Objective 4 To ensure that all Traveller Accommodation is provided to the highest standard following detailed consultation with local communities and Traveller advocacy groups.	Please see response to H1 Objective 3 above.

Policies/Objectives Housing Strategy	Consistency
Policy 7: Residential Design and Layout 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	The proposed development represents a high-quality design which will provide a high degree of residential amenity to future residents all within a well designed public realm which is of an excellent standard.
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.	Section 3 of this Statement of Consistency provides detail on how the proposal is consistent with relevant Government Guidance. The MOLA Housing Quality Assessment and MOLA Architectural Design Report, along with the Murray Associates Landscape Design Report set out the high-quality layout of the proposed development.
H7 Objective 2 To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.	Solar panels are to be provided on the roofs of the apartment buildings and the design of the dwellings will incorporate energy efficiency measures.
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 scheme where necessary.	The proposed development has been designed to comply with DMURS (see DBFL DMURS consistency note).
H7 Objective 4 To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).	The proposed development has been designed to comply with DMURS (see DBFL DMURS consistency note).
Policy 8: Public Open Space 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.	All public, communal and private open spaces within the scheme benefit from passive surveillance, with clear definition between the different categories of spaces. The proposed development will provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares. The proposed open space for the development at 20.4% therefore meets and exceeds the open space requirements as set out in the Development Plan (15%).
H8 Objective 1 To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring.	The proposed development provides 22.2% public open space as part of the design, which meets the 15% requirement of the Draft Plan. Using the mix in the proposed development (138 x 3.5 + 142 x 1.5)=696 x 24 sq. m = 16,704 sq. m requirement. The proposal includes c. 17,097 open space (excluding Communal Open Space of some 2,690 sq. m), and is considered in compliance. (combined c. 19,787 sq. m).
H8 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.	Appropriate demarcation between different open space typologies is provided within the Landscape Design (as set out in the Murray Associates material)
H8 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.	The proposed development includes a series of public open spaces distributed evenly throughout the subject site, which are overlooked; with passive surveillance incorporated into the design.
Policy 9: Private and Semi-Private Open Space 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	The private amenity spaces of the houses and apartments exceed the Development Plan standards and the Apartment Guidelines standards.
H9 Objective 1 To ensure that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13 Implementation and Monitoring	As set out in the HQA by Murray Associates, all private open spaces are designed in accordance with the standards.
H9 Objective 2 To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semiprivate or communal open space that supports a range of active and passive uses	Communal open space is provided to the apartment buildings and the duplex buildings which is of a high quality and integrated into the overall landscape design.
Policy 10: Internal Residential Accommodation 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	The internal space of the houses and the Apartments meet the requirements of the County Plan and Apartment Guidelines 2020.
H10 Objective 1 To promote the provision of high-quality houses and apartments/duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 13 Implementation and Monitoring	The proposed development includes a mix of houses and apartments and duplex apartments which meet the relevant quantitative and qualitative standards as set out in the MOLA HQA.
H10 Objective 2 To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity	The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed house types incorporate generous space standards so as to provide for adaptable living requirements. The MOLA Architectural Design Report provides further detail on the adaptability of the buildings. In addition, Lifecycle Report (prepared by Cairn, MOLA Architects and Murray Associates Landscape Architects) provides detail on the robustness of the materials reducing future running costs etc
Policy 11: Privacy and Security Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing	The layout provides passive surveillance and overlooks open spaces and dwellings are dual frontage, where required to provide additional layout benefits.
H11 Objective 1 To ensure there is a clear definition and delineation between private, semi-private (communal) and the public open spaces that serve residential development	Appropriate demarcation between different open space typologies is provided within the Landscape Design (as set out in the Murray Associates material)
H11 Objective 2 To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm	Dwellings are purposely designed so that they provide street frontage to maximise passive surveillance of the streets and public realm.

Policies/Objectives Housing Strategy	Consistency
H11 Objective 3 To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.	External boundaries comprise 2m concrete block wall rendered with concrete coping while the internal rear boundaries comprise a robust 2m high timber panel fence with concrete posts.
H11 Objective 4 To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.	The distance between the apartment buildings is c. 33m.
Policy 13: Residential Consolidation 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 proposed density of c 33.1 units per hectare Gross (37.1 net) is appropriate for a partial centrally located site and edge of centre site for a small town as set out in the Sustainable Residential Density Guidelines 2009.

## 6.7 Chapter 7 Sustainable Movement

**Table 6.6 – Consistency with Relevant Policies for Sustainable Movement**

Policies/Objectives Sustainable Movement	Consistency
SM1 Objective 4 To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.	The proposed development includes a Mobility Management Plan prepared by DBFL to promote sustainable travel patterns.
Policy 2 - Walking and Cycling Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets	The proposal includes cycle and footpath facilities throughout the development including a greenlink, all to promote connectivity to the town centre to the north, 'Graydon' to the east and Athgoe Road to the west.  The proposed layout has been designed in accordance with DMURS. Please refer to DBFL Consultant Engineers' DMURS Compliance Statement, and Traffic and Transportation Assessment for further detail.
SM2 Objective 3 To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.	The proposed development includes a north south shared cycle walkway (Greenway and provides east west permeability and provides a link to the boundary to the north (St. Finian's Way).
SM2 Objective 4 To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.	The proposed development includes a north south shared cycle walkway (Greenway and provides east west permeability and provides a link to the boundary to the north (St. Finian's Way).
SM2 Objective 5 To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.	The proposed development has been designed in accordance with DMURS as set out in the DMURS compliance document prepared by DBFL included with the application.
SM2 Objective 6 To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.	The proposed development has been designed in accordance with the standards contained in the national cycle manual as set out in the DBFL IDR and DMURS Statement.
SM2 Objective 7 To promote walking and cycling for school trips by implementing the following measures: • Identifying school sites that are as close as possible to the communities they serve; • Ensuring that multiple access points are provided to school sites for pedestrians and cyclists; • Ensuring that adequate and secure bicycle storage is provided within schools; • Promoting initiatives such as the Green Schools and Schools Streets projects; and • Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways. • Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools	The completion of the east west link street between the proposed development and Graydon to the east will provide enhanced permeability in Newcastle, linking the site to the existing St. Finian's School and also to the School site reserved on Cairn lands to the south east as part of Graydon.
SM2 Objective 14 To ensure that all walking and cycling routes have regard to environmental conditions and sensitivities including biodiversity, protected species and designated sites and to incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.	The shared cycle/walking route has taken into account the adjoining Burgence Hedgerow Plot in its design. Appropriate mitigation is provided in the Biodiversity Chapter of the EIAR.
SM3 Objective 3 To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.	The proposed development promotes a compact form of development within Newcastle, completing the east west link street which will provide more permeability within the town and also linking to the bus stops on the main street.
SM Policy 5 - Street and Road Design Ensure that streets and roads within the County are designed to balance the needs of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.	As per Sustainable Movement (SM) Policy 2 above.
SM5 Objective 1 To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that promotes active travel modes and public transport	The main access routes (e.g. leading to/from the site access nodes with Link streets) of internal street network of Local streets will be formed using standard macadam / asphalt finishes, however for Homezone streets, a colour contrast is to be achieved by way of a buff macadam finish in order to lower design speed in these areas.
SM5 Objective 2 To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets	The DMURS document prepared by DBFL states that the proposed residential development is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2019. The scheme proposals

Policies/Objectives Sustainable Movement	Consistency
	are the outcome of an integrated design approach that seeks to implement a sustainable community connected by well-designed streets which deliver safe, convenient, and attractive networks in addition to promoting a real and viable alternative to car-based journeys
SM6 Objective 8 To require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment.	A Mobility Management Plan prepared by DBFL is included with the application.
SM6 Objective 10 To prioritise traffic calming measures, where appropriate, and works needed to improve safety at road crossings.	The proposed development includes a new junction layout on the Athgoe Road along with providing a pedestrian path to link to the existing path on the Athgoe Road.
SM Policy 7 - Car Parking and EV Charging Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities	A total of 38 no. electrical vehicle car parking spaces are proposed which equates to 21% of the apartment / duplex car parking provision. It is assumed that residents of the housing units can utilise their private power supply to charge electric vehicles parked in-curtilage.
SM7 Objective 1 To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility	The proposed development layout design provides a total of 423 no. car parking spaces comprising 251 no. for the houses, 172 no. for the apartment / duplex units.
SM7 Objective 2 To limit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available	13 no. car parking spaces are assigned for the creche (as part of Graydon) No additional spaces are provided notwithstanding the increase in the size of the permitted creche.
SM7 Objective 5 To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.	A total of 38 no. electrical vehicle car parking spaces are proposed which equates to 21% of the apartment / duplex car parking provision. It is assumed that residents of the housing units can utilise their private power supply to charge electric vehicles parked in-curtilage.
SM7 Objective 9 To ensure that car parking is designed in such as manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements: • Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species; • Provision of not more than two parallel or five perpendicular spaces between trees/planting bays; • Use of permeable paving, where appropriate	Landscaping has been integrated into the design of the parking layout. Planting is provided between spaces. Permeable paving driveways for all on-curtilage driveways

## 6.8 Chapter 8 - Community Infrastructure and Public Open Space

**Table 6.7 – Consistency with Relevant Policies for Natural, Cultural and Built Community Infrastructure and Public Open Space**

Policies/Objectives Natural, Cultural and Built Community Infrastructure and Public Open Space	Consistency
COS 1 Objective 1 To provide appropriate and accessible community facilities to meet the needs of all citizens of the County, comprising of a fast-growing young population and including an ageing population, consistent with NPOs 28 and 30 of the NPF.	The proposal includes a creche as well as extensive areas of public open space and is located close to existing community facilities such as St. Finian's Community centre on the main street and to the Primary School to the west.
COS 2 Objective 1 To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.	The proposed development includes a creche of c. 778 sq. m & please refer to response to COS 3 Objective 2 below.
COS 3 Objective 2 To ensure the provision of new community centres in new and existing development areas or where provision is the responsibility of Developer, the Council will ensure the developer provides, in proximity to the population they serve and in accordance with the standard of one centre per 8,000 population with a size of approximately 1,200-1,800 sqm, or dependent on specific local demographic or other needs, smaller centres at a more local level, generally between 350-650sqm in size at the discretion of the Council, or as may be updated by any future community centre strategy carried out by the Council.	It is noted SD20A/0037 (supermarket under construction) adjacent to the proposed development provides a community room/centre of c. 140 sq. m. In addition, the existing St. Finian's Community Hall (on the main street) is a significant facility. St. Finian's National School has been opened and provides additional facilities and space available for use by the local community.
COS 3 Objective 3 To provide discretion to the Council to require residential or mixed used developments in new development areas to provide a pro rata contribution towards the provision of a community centre, in accordance with the standards set out in Objective 2 and in line with the Development Contribution Scheme.	The applicant would be happy for the inclusion of a condition in respect of community facilities if deemed appropriate by the Board in accordance with the SDCC Development Contribution scheme.
Policy 4 - Sports Facilities and Centres Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable	St. Finian's GAA has a pitch located from the Aylmer Road to the north east of the town. A 5 a side all weather pitch and full size all weather soccer pitch is located on College Road (Peamount United FC). The SHD 'Graydon' Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces areas and experiences, which includes a pitch and MUGA. In addition, St. Finian's Community centre is located to the north of the development on the Main Street. Additional community space was provided in the Supermarket application.

Policies/Objectives Natural, Cultural and Built Community Infrastructure and Public Open Space	Consistency
COS 4 Objective 5 To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated.	The proposed open space areas are of high quality (including a centrally located Sean Feirm park) which provide for active and passive recreational amenity activities.
COS 4 Objective 6 To facilitate the provision of appropriately scaled children's play facilities and teen space facilities at suitable locations across the County within existing and new residential development.	The proposed open space areas are of high quality (including a centrally located Sean Feirm park) which provide for active and passive recreational amenity activities including play facilities.
COS 4 Objective 14 To provide a sports and recreational amenity in Newcastle, incorporating a full-size GAA, multi-use, all-weather playing pitch, 2 basketball courts, tennis court, dressing rooms, a walking/jogging/cycling track as well as parking areas and related additional open space.	It is noted St. Finian's GAA has a pitch located from the Aylmer Road to the north east of the town. A 5 a side all weather pitch and full size all weather soccer pitch is located on College Road (Peamount United FC). The SHD 'Graydon' Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces areas and experiences, which includes a pitch and MUGA.
COS 5 Objective 4 To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type set out in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha per 1,000 population, subject to the Regional Park meeting the open space 'accessibility from homes' standard set out in Table 8.1.	The proposed development provides 22.2% public open space as part of the design, which meets the 15% requirement of the Draft Plan. Using the mix in the proposed development (138 x 3.5 + 142 x 1.5)=696 x 24 sq. m = 16,704 sq. m requirement. The proposal includes c. 17,097 open space (excluding Communal Open Space of some 2,690 sq. m), and is considered in compliance. (combined c. 19,787 sq. m).
COS 5 Objective 5 To require the provision of open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, such contribution being held solely for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion to accept a financial contribution in lieu of the remaining open space requirement to allow provision or upgrade of Regional Parks, subject to the Regional Park meeting the open space 'accessibility from homes' standard specified in Table 8.1. Where the Council accepts financial contributions in lieu of open space, the total contribution shall be calculated on the basis of the costs set out in the applicable Development Contribution Scheme, in addition to the development costs of the open space.	The proposed development provides 22.2% public open space as part of the design, which meets the 15% requirement of the Draft Plan. Using the mix in the proposed development (138 x 3.5 + 142 x 1.5)=696 x 24 sq. m = 16,704 sq. m requirement. The proposal includes c. 17,097 open space (excluding Communal Open Space of some 2,690 sq. m), and is considered in compliance. (combined c. 19,787 sq. m).
COS 5 Objective 6 To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.	The proposed development provides 22.2% public open space as part of the design, which meets the 15% requirement of the Draft Plan. Using the mix in the proposed development (138 x 3.5 + 142 x 1.5)=696 x 24 sq. m = 16,704 sq. m requirement. The proposal includes c. 17,097 open space (excluding Communal Open Space of some 2,690 sq. m), and is considered in compliance. (combined c. 19,787 sq. m).
COS 5 SLO 1 To identify and set aside land, ensuring the delivery of the quantum of OS within the general area of the Burgage South neighbourhood Park as identified in the Newcastle Local Area Plan (2012), and to pursue all means of achieving this including proactive engagement with stakeholders and through the consideration of planning applications affecting this area.	The remaining lands which comprise Burgage South neighbourhood park in the Newcastle LAP are under the ownership of the Department of Education. Cairn delivered a portion of the Burgage South Park under their ownership in the Graydon SHD located to the east. COS 5 SLO doesn't require the OS to be delivered in a planning application so there is no material contravention, in this regard. Cairn has delivered the portion of the Burgage South Park under their ownership as part of the Graydon SHD located to the east.
COS 5 Objective 8 To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers: • provision of an appropriate mix of hard and soft surfaced areas; • enhancement of biodiversity and existing trees and hedgerows; • incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate; • provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.	As set out in the Murray Associates Landscape Design Report, the proposed open space provides a mix of hard and soft surfaced areas, along with additional planting, incorporation of SUDS features into the design and seating.
COS 5 Objective 10 To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.	
COS 5 Objective 12 To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.	The SUDs measures are of high quality which will integrate into the open space areas, providing an enhanced amenity and biodiversity value to the subject lands.
COS 5 Objective 13 To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability	The proposed open space areas are of high quality (including a centrally located Sean Feirm park) which provide for active and passive recreational amenity activities, which can be easily accessed.
COS 5 Objective 14 To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1.	The proposed open space areas are of high quality (including a centrally located Sean Feirm park) which provide for active and passive recreational amenity activities, which can be easily accessed. The north south green route assists in this regard in terms of accessibility.

<b>Policies/Objectives Natural, Cultural and Built Community Infrastructure and Public Open Space</b>	<b>Consistency</b>
COS 5 Objective 15 To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity/hobbies, and visual interest	Response as per COS 5 Objective 13
COS 5 Objective 16 To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures: • Providing active frontages and maximising passive surveillance from adjacent housing and/or public thoroughfares; • Eliminating buildings which back-on or gable-front public open spaces; • Designing corner units with active frontage; and • Encouraging increased use through improved access and quality of facilities'; • Careful location, design and choice of surface materials and site furniture'	As set out in the MOLA Design Report, active frontages are provided to the open space areas and rear gardens backing onto open space areas are avoided through careful design. Corner units are active and front onto areas, and the north south green route assists in this regard in terms of accessibility. Durable, high quality materials are provided throughout the landscaping scheme as set out in the Murray Associates Design Statement and associated drawings.
COS 5 Objective 17 To ensure that incidental areas of open space which do not function as useable open space and/or are not clearly visible from the public realm, are designed out of a proposed scheme	Incidental open spaces are avoided through careful design and inclusion of appropriate planting to provide an amenity benefit to all areas of the landscape design.
COS 5 Objective 19 To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure playspaces and play facilities comply with universal design principles.	Formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities are provided in the Landscaping Design by Murray Associates.
COS 5 Objective 20 To ensure that children's play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13 Implementation and Monitoring.	Response as per COS 5 Objective 19
COS 7 Objective 1 To support and facilitate the provision of childcare facilities on well located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF	A creche of c. 778 sq. m is provided on lands located in Graydon, to the east, which will cater for both Graydon and this SHD development. The creche is located between the existing St. Finian's school and the school site reserved on the Cairn Graydon lands.
COS 7 Objective 2 To require provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the 'Childcare Facilities Guidelines for Planning Authorities' (2001) or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity.	A creche of c. 778 sq. m is provided on lands located in Graydon, to the east, which will cater for both Graydon and this SHD development. Excluding the 1 bed units the total of 2-4 bed units is 597, which equates to potential childcare requirement of c. 160 no. children. It is estimated that the creche of c. 778 sq. m can cater for in the order of 172 children having regard to an accepted industry average of c. 4-5 sq. m gross floor space (gross) per child (4.5 sq. m) depending on the type of childcare offered by the end user
COS 7 Objective 3 To require childcare facilities to be provided in new communities in tandem with the delivery of residential development and, where a Local Area Plan or Planning Scheme applies, in accordance with the phasing requirements of that plan/scheme.	A creche of c. 778 sq. m is provided on lands located in Graydon, to the east, which will cater for both Graydon and this SHD development.
Policy 8 - Primary and Post Primary Schools Policy COS 8(a) Work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities. Policy COS 8(b) Engage with the Department of Education and Skills and to support the Department's School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need	A primary school site has been reserved within the Graydon Development to the east, by Cairn. There is an existing Primary School (St. Finian's) located adjacent to the subject lands to the east.
COS 8 Objective 1 To reserve and identify early on sites for primary and post-primary provision in developing areas through the Development Plan, Local Area Plans, Planning Schemes and masterplans, in consultation with the Department of Education and Skills and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.	A primary school site has been reserved within the Graydon Development to the east, by Cairn. There is an existing Primary School (St. Finian's) located adjacent to the subject lands to the east. Cairn Homes consulted with the Department in Q1 2021, and there is no current requirement.
COS 8 Objective 3 To require schools 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 and Planning Schemes or as may be otherwise required.	The Graydon Development by Cairn (under construction to the east) has reserved a school site.

## 6.9 Chapter 10 – Energy

**Table 6.8 – Consistency with Relevant Policies for Energy**

<b>Policies/Objectives</b>	<b>Consistency</b>
Policy 3 - Energy Performance in Existing and New Buildings Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.	High levels of energy conservation are proposed as well as renewable energy (Solar Panels) which is outlined in the Energy Statement prepared by Waterman Moylan and included in the application.
E3 Objective 3 To require all new development 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	High levels of energy conservation are proposed as well as renewable energy (Solar Panels) s outlined in the Energy Statement prepared by Waterman Moylan and included in the application in accordance with relevant building regulations.

## 6.10 Chapter 11 – Infrastructure

Table 6.9 – Consistency with Relevant Policies for Infrastructure

Policies/Objectives Infrastructure	Consistency
IE 2 Objective 3 To promote and support the implementation of the Greater Dublin Strategic Drainage Study, Dublin Region Local Authorities (2005) GDSDS.	As set out in the IDR by DBFL, the proposed development has been designed in compliance with Greater Dublin Strategic Drainage Study (GDSDS).
IE 2 Objective 9 To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system	A confirmation of feasibility and Statement of Design Acceptance has been received for the development from Irish Water.
IE 2 Objective 10 To require all development proposals to provide a separate foul and surface water drainage system – where practicable	The proposed foul infrastructure is proposed to connect to the public sewerage system.
Policy 3: Surface Water and Groundwater Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive	A separate foul and surface water drainage system are proposed as set out in the IDR prepared by DBFL included with the SHD application.
E3 Objective 2 To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality	Where possible, attenuation facilities have been designed as above ground storage in order to maximize the use of SuDs and limit the requirement of underground tanks to promote biodiversity. Swales will be utilised as a SuDs measure where possible to drain adjacent roads and greenlinks. Swales and other SuDs measures such as tree pits, permeable paving and green roofs have been incorporated into the drainage design to reduce the run-off volume and improve run-off water quality
IE4 Objective 1 To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.  <b>Proposed change as part of Material Amendments:</b> IE4 Objective 1: To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive and Chapter 13 Implementation and Monitoring and the policies and objectives of this chapter.	A Site Specific Flood Risk Assessment has been carried out by DBFL in accordance with the Flood Risk Guidelines and in accordance with the precautionary principle which confirms the development is at low risk of flooding.
POLICY 6: Waste Management Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes	A Construction Waste Management Plan and Operational Phase Waste Management Plan are included with the application. The mitigation measures contained in the EAIR – Material Assets Waste Chapter will be implemented.
E 6 Objective 7 To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste	
POLICY 7 Environmental Quality To seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation	The lighting scheme has been designed to reduce light spill and has been designed to be 'Bat friendly'. The EIAR contains mitigation in relation to noise and air quality.
IE 7 Objective 5 To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013)	The roads have been designed in accordance with the principles of DMURS as set out in the DMURS compliance document by DBFL.
IE 7 Objective 6 To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas	The lighting scheme has been designed to reduce light spill and has been designed to be 'Bat friendly'.
Planning Policy IE8 Casement Aerodrome Safeguard, having regard to the requirements of the Department of Defence, the current and future operational, safety and technical requirements of Casement Aerodrome and facilitate its ongoing development for military and ancillary uses.	An Aviation Safety Assessment submitted with this application has been carried out by O'Dwyer Jones which confirms that the development complies with the requirements.
IE8 Objective 1: To ensure the safety of military and other air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities.	
IE8 Objective 2: To maintain the airspace around Casement aerodrome free from obstacles to facilitate aircraft operations to be conducted safely, as identified in the Development Plan Index map and outlined in Chapter 13 Implementation and Monitoring.	
IE8 Objective 3: To implement the principles of shielding in assessing proposed development in the vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) (See Chapter 13 Implementation and Monitoring).	
IE8 Objective 4: To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (See also Chapter 13 Implementation and Monitoring).	
<b>Proposed change as part of Material Amendments:</b> To prohibit and restrict development in the environs of Casement Aerodrome, where it may cause a safety hazard. (See also <b>Policy IE13 Public Safety Zones</b> , and Chapter 13 Implementation and Monitoring)."	
<b>Policy IE11: Helipads</b> Provide protection for hospital helipads, in particular the existing helipads at Tallaght Hospital and at Hermitage Clinic, by ensuring that a 1 in 8 slope in all directions from the edge of the helipad is kept free of any new obstacles (and under any future Approach or Departure Surface which may be designated for such helipads), and by avoiding any overhead wires or masts in their vicinity.	An Aviation Safety Assessment submitted with this application has been carried out by O'Dwyer Jones which confirms that the development complies with the requirements.

**6.11 Development Management Standards**

**Table 6.10 – Consistency with Relevant Development Management Standards**

Standards	Consistency
<p><b>Design Statements:</b> In line with the provisions of Policy QDP7 Objective 1, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a Design Statement. The Design Statement should address contextual and urban design issues and clearly explain the design process, the design options considered and the rationale behind the adopted design development strategy. A Design Statement should consist of:</p>	<p>The Architectural Design Report prepared by MOLA accompanies the application, addressing the Urban Design Manual, the Urban Development and Building Height Guidelines and the Apartment Guidelines.</p>
<ul style="list-style-type: none"> <li>→ A detailed analysis of the proposal and statement based on the 12 design criteria set out in the 'Urban Design Manual' (2009) and reflected in the South Dublin County Council's Building Height and Design Guide as follow:</li> </ul>	
<p>Detailed design including materials and external finishes should have regard to the policy, objectives and provisions of the South Dublin County Development Plan 2022-2028. In particular the guidance, and performance-based design criteria set out in the South Dublin County Height and Density Guide must be incorporated with due regard being had to relevant Ministerial Guidelines including the 'Urban Design Manual' (2009); 'Sustainable Residential Development in Urban Areas' (2009); 'Urban Development and Building Height – Guidelines for Planning Authorities' (2018); and 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2018).</p>	
<p><b>Materials, Colours and Textures</b> In addition to the above, design statements shall address the following criteria:</p> <ul style="list-style-type: none"> <li>→ Where individual larger buildings are proposed, they should generally be of contemporary architectural design and finish (including use of colour).</li> <li>→ The proposal should provide a richness to the detailing and high-quality materials.</li> <li>→ A material palette should be created that is simple and clear, sympathetic to surrounding urban fabric, has a connection to its context, builds and the established sense of place, whilst also creating order between the elements.</li> <li>→ Reflecting the material character of the surrounding neighbourhood can create a dialogue with the surrounding buildings, forging a connection.</li> <li>→ Materiality should be considered in conjunction with facade proportions.</li> </ul>	
<b>13.4.3 Building Heights and Density</b>	
<p>In line with the provisions of the South Dublin Building Heights and Density Guide, development proposals for increased building heights and densities shall be accompanied by a contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development. Proposals are required to demonstrate to the satisfaction of the Planning Authority that the overall positive benefits of the development justify the scale of increased height being proposed.</p> <p>In order to demonstrate the overall positive benefits and justify the scale of increased height being proposed a detailed analysis of the existing context and a demonstration that the proposed height increase is contextually appropriate will be required. This process of analysis shall be considered alongside the provisions set out in the 'Urban Design Manual – A Best Practice Guide' (2009) which forms a key component in the design and planning processes for higher density and larger scale development proposals.</p>	<p>A contextual analysis is undertaken as part of the LVIA, contained in the EIAR, which supports the height of the buildings proposed. Compliance with the Urban Design Manual, South Dublin Building Heights Guide is set out in the Architectural Design Report by MOLA.</p>
<b>13.5 Residential Development</b>	
<b>13.5.2 Mix of Dwelling Types</b>	
<p>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. SPPR 1 of the document Sustainable Urban Housing: Guidelines for New Apartments (2020) states that residential development may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.</p> <p>The guidelines further note that statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s). The Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028. In recognising the need to provide more family type housing within new apartments, the quantum of extant planning permissions with one and two bedroom units, and potential impact high concentrations of mono type housing has on areas, especially in regeneration area, the Development Plan has set a benchmark for 3-bedroom units, set out below.</p>	<p>The proposed development provides a wide range of unit types comprising, houses, duplex apartments and apartment dwellings. It is noted 49.2% of all dwellings are 3 bedrooms or greater.</p> <p>The proposed development includes ground floor apartments in the 2 no. apartment buildings and 3 no. duplex apartment blocks which are suitable for older persons. In addition, in consultation with SDCC Housing Department, some specific Traveller Accommodation is provided. Furthermore Part V proposals are included with the SHD application. The proposed development provides 19.2 % 1 bedroom (apartments), 31.4 % 2 bedroom dwellings, 40% 3 bedroom dwellings, 8.9% 4 bedroom dwellings and 0.3% 5 bedroom dwellings.</p>

Standards	Consistency
<p><b>Unit Mix</b>                      Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>→ there are unique site constraints that would mitigate against such provision or</li> <li>→ that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.</li> </ul> <p>Unit mix should also provide for:</p> <ul style="list-style-type: none"> <li>→ As part of the Housing Quality Assessment defined under Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments (2020), a detailed breakdown of the quantum of proposed unit types including the split between 1-bed, 2-bed, and 3-bed plus and which is in accordance with the minimum 30% 3-bed unit,</li> <li>→ A statement demonstrating how the scheme has been designed for / and could be adapted in the future for older people / persons with a disability / or lifetime homes, on a site or floor plan that:</li> <li>→ Are designed and located having regard to the needs of older people and/or persons with a disability.</li> <li>→ Are designed having regard to the concept of lifetime adaptable and/or multi-generational homes.</li> <li>→ In new identified residential areas, it is appropriate that schemes include a mix of house type and where a scheme is solely houses, smaller units of less than 3-bed providing for multi-generational homes, must be provided, subject to urban design and ensuring efficient use of urban land.</li> </ul> <p>Further to the above requirement, Council Part 8 or Part 10 developments or such developments by Approved Housing Bodies for residential schemes may propose a different mix having regard to their specific function to deliver on the needs of the Council Housing Department and Housing List.</p>	
<p><b>13.5.3 Unit Tenure</b></p>	
<p>The Council will support the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA. Further to the above requirement, Council Part 8 or Part 10 or such developments by Approved Housing Bodies for residential schemes may propose a different mix having regard to their specific function to deliver on the needs of the Council Housing Department and Housing List.</p>	<p>The proposed development provides a mix of tenure type, within the development including Part V and accommodation suitable for members of the Traveller community as discussed with the Housing Department of South Dublin County Council.</p>
<p><b>Children's Play Areas</b></p>	
<p>The Council will require 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. Student accommodation, housing for older persons and one bedroom units are excluded from the requirements in relation to children's play. The minimum requirements for provision of play facilities are as follows:</p> <ul style="list-style-type: none"> <li>→ All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play spaces.</li> <li>→ 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 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, provision will be required for 10 units or over.</li> <li>→ New play spaces should generally be based on the principles of natural play.</li> <li>→ More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities.</li> <li>→ 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.</li> <li>→ Play spaces should be designed to enhance the visual appearance of an area.</li> <li>→ Robust natural materials that are less susceptible to vandalism should be used wherever possible.</li> <li>→ Play spaces should cater for a wide range of age groups and abilities and be universally accessible.</li> <li>→ Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), (or any superseding document).</li> </ul>	<p>Children's play areas are provided as set out in the Murray Associates Landscape Design Report</p>

Standards	Consistency
<p><b>Bicycle Parking Design/Provision</b></p> <p>All bicycle parking spaces shall be designed in accordance 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:</p> <ul style="list-style-type: none"> <li>→ <b>Location:</b> 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</li> <li>→ <b>Quantity:</b> 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..</li> <li>→ <b>Design:</b> 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.</li> <li>→ <b>Management:</b> 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.</li> </ul> <p><b>Proposed change in Material Alterations:</b> 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'), <b>as may be amended or updated</b> in relation to design and provision of facilities, including the following: The Apartments Guidelines also advise that:</p> <ul style="list-style-type: none"> <li>→ Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities at planning application stage by the development proposer; and</li> <li>→ Appropriate conditions in relation to the operation and maintenance of the cycle storage facilities should be attached to any grant of permission for apartment developments.</li> </ul> <p>The Council will also seek to provide additional opportunities for the provision of bicycle parking facilities along public transport routes and within town and village centres, parks, and other areas of civic importance. To promote and facilitate cycling, all new commercial developments that have the capacity to accommodate in excess of ten employees or ten students (or a combination of both) shall be required to provide shower and changing facilities.</p>	<p>The development complies with the minimum cycle parking standards as set out in the Transport Assessment undertaken by DBFL Consulting Engineers.</p> <p>The bicycle parking provision and facilities are in accordance with the Apartment Guidelines and National Cycle Manual</p>
<p><b>13.8.2 Car Parking Standards</b></p>	

Tables 13.25 and 13.26 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).

For any commercial use not specified within Table 13.25 the default parking rate will be calculated based on those of a comparable use and/or determined as part of a Transport and Traffic Assessment.

Table 13.26: Maximum Parking Rates (Residential Development)

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

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

- 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 development does not exceed the maximum standards as set out in the TTA undertaken by DBFL. The proposed development layout design provides a total of 423 no. car parking spaces comprising 251 no. for the houses, 172 no. for the apartment / duplex units. 13 no. car parking spaces are assigned for the creche (as part of Graydon) No additional spaces are provided notwithstanding the increase in the size of the permitted creche.

Standards	Consistency
<p><b>13.8.3 Car Parking/Charging for Electric Vehicles (EVs)</b></p> <ul style="list-style-type: none"> <li>→ 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.</li> <li>→ The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.</li> <li>→ 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.</li> <li>→ It should be designed and located in such a way as to ensure passive surveillance and avoid anti-social behaviour.</li> <li>→ 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.</li> <li>→ EV charging facilities should not impinge on shared parking allocation.</li> <li>→ EV charging facilities should not obstruct or impinge on walking or cycling paths.</li> <li>→ Charge points should avoid areas which are already restricted by existing street furniture e.g. bollards, road signs, benches, bike racks.</li> <li>→ Charge points should not impede lower carbon forms of passenger transport.</li> <li>→ 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.</li> <li>→ For residential multi-unit buildings, the necessary ducting for all car parking spaces should be installed, allowing provision for additional electrical infrastructure.</li> <li>→ For new dwellings with in-curtilage parking, appropriate infrastructure should be provided to allow for installation of a charging point at a later date.</li> </ul> <p><b>Proposed Change as part of Material Amendments (bullet point 1):</b> EV charging shall be provided in all new residential, mixed use and commercial development and shall comprise <del>15%–20%</del> <b>a minimum of 20%</b> of the total parking spaces provided (or as may be further required by legislation), with higher provision within this range required in urban areas, with the remainder of spaces to be future proofed.</p> <p><b>Proposed Change as part of Material Amendments (bullet point 2):</b> The remainder of the parking spaces should be constructed to be capable of accommodating future charging points., <del>as required.</del></p>	<p>20% of car parking spaces will be provided with charging and the remainder will be ducted for future infrastructure.</p> <p>The car parking is internal to the scheme and therefore will not facilitate anti social behaviour and will be a managed space.</p>
<p><b>(II) Design and Siting of Refuse Storage, Recycling and Bring Facilities in Developments</b></p> <p>The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities:</p> <ul style="list-style-type: none"> <li>→ The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants.</li> <li>→ Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the guidelines Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH (2020). Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity.</li> </ul>	<p>Compliance with the Apartment Guidelines with respect to operational waste is set out in the Operational Waste Management Plan (See Appendix E 11.2 Volume III of the EIAR, prepared by AWN).</p>
<p><b>(IV) Construction and Demolition Waste</b></p> <p><b>Construction and Demolition Waste Management Plans</b> should be submitted as part of development proposals for projects in excess of any of the following thresholds: New residential development of 10 units or more;</p> <ul style="list-style-type: none"> <li>→ New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,000 square metres;</li> <li>→ Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume, of Construction and Demolition (C&amp;D) waste;</li> <li>→ Civil engineering projects in excess of 500 cubic metres of waste materials used for development works on the site.</li> </ul> <p>The Construction and Demolition Waste Management Plan, as a minimum, should include provision for the management of all construction and demolition waste arising on site, and make provision for the reuse of said material and/or the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, excavated material from development sites is to be reused on the subject site.</p>	<p>Please refer to the Resource &amp; Waste Management Plan (See Appendix E 11.1 Volume III of the EIAR prepared by AWN).</p>

**6.12 Chapter 12 Our Neighbourhoods – Citywest/Saggart/Rathcoole/Newcastle**

- 6.28 The Plan outlines that *“The centres of Rathcoole and Newcastle villages are designated Architectural Conservation Areas (ACA), recognising high-quality groups of structures within the village areas. Newcastle contains landmark medieval structures, a relic field system morphology and a built form that underscores the historical significance of the area”*
- 6.29 With regard to housing, the Plan states that *“In addition to the consolidation of the existing urban areas new residential development will be located within the Fortunestown/Citywest areas and on lands within and contiguous to the village centres of Newcastle and Rathcoole.”*
- 6.30 In relation to the above, the design of the development has taken into account the Burgage Plot field system and the development is sequentially proximate to existing development to the north (St. Finian’s Way) and to the east at Graydon.

**6.13 Development Management Standards – Draft South Dublin County Development Plan 2022-2028**

**6.13.1 Mix of Dwelling Types**

- 6.31 Section 13.5.2 of the Draft Development Plan states that *“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.”*
- 6.32 The development includes a wide range of building heights comprising 2 storey houses (45.7%), 3 storey duplex buildings (12.9%), and 5 storey apartment buildings (41.4%). The proposal provides a mix dwelling types, comprising houses (128 no. – 8 no. 2 bed, 94 no. 3 bed, 25 no. 4 bed & 1 no. 5 bed), duplex apartments (18 no. 2 bed & 18 no. 3 bed) and apartments (54 no. 1 bed, 88 no. 2 bed).

**6.13.2 Residential Building Density and Heights**

- 6.33 The development plan outlines that in development proposals of increased density and heights, in accordance with the South Dublin Building Heights and Density Guide, they should be accompanied by a contextual analysis by which the suitability or otherwise of different density can be assessed with reference to the receiving environment of the proposed development. Such is required to demonstrate to the satisfaction of the Planning Authority that the overall benefits of the development justify the scale of increased density and height being proposed.
- 6.34 The overall density of c. 33.1 units per hectare Gross (37.1 net), is considered appropriate for the site, under the guidance of the South Dublin Building Heights and Density Guide as well as the SRD 2009 which seeks a density of c. 30-50 units per hectare for outer suburban sites.

**6.13.3 Public Open Space/ Children’s Play**

- 6.35 The draft plan requires a minimum of 15% open space on lands, such as the subject site, that are designated Zoning Objective RES-N as part of a development. The proposed development will provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares. The proposed open space for the development at 22.2% therefore meets and exceeds the open space requirements as set out in the Draft Development Plan (15%).
- 6.36 The draft development plan specifies that the council will require children’s play areas to be provided as an integral part of the design of new residential developments, to be addressed as part of a landscape plan. A landscape design report by Murray Associates Landscape Architects is included with this application and addresses this.

**6.13.4 Dwelling Standards**

- 6.37 We refer the Board to the Housing Quality Assessment prepared by MOLA Architects which sets out how the proposed development complies with the Apartment Guidelines and Draft South Dublin County Development Plan 2022-2028.

**6.13.5 Privacy**

- 6.38 The development provides for appropriate separate distances between dwellings at 22m for houses and 33m for the apartments. This maintains a high level of privacy and amenity obtained by residents and reduced the level of overlooking and overshadowing.

**6.13.6 Dual Aspect**

- 6.39 The development plan deferred the guidance on Dual Aspect ratios to the Apartment guidelines 2020. These guidelines state that 33% of apartment units are required to be dual aspect in “more central and urban locations”. For “suburban or intermediate locations”, the minimum amount of dual aspect units is 50%.
- 6.40 The subject site is considered to be a suburban or intermediate location. The proposed development provides c. 50% dual aspect apartments/duplex apartments.

**6.13.7 Access Cores and Communal Areas**

- 6.41 In apartments schemes, own door access should be facilitated where possible. Where shared access lobbies do occur, the number of units served by one entrance should be minimised. As part of this development, shared lobbies have been limited when possible and the inclusion of own door units has been provided where possible and with the addition of houses and duplex units.

**6.13.8 Early Childhood Care and Education Facilities**

- 6.42 Section 13.6.1 of the Draft Plan sets out requirements for Early Childhood Care facilities and notes Applications for childcare facilities should be assessed with regard to the requirements of the ‘Childcare Facilities: Guidelines for Planning Authorities’, DEHLG (2001) and Circular Letter PL 3/2016 (DECLG), 2016) and any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments.
- 6.43 A creche of c. 778 sq. m is provided on lands located in Graydon, to the east, which will cater for both Graydon and this SHD development. Excluding the 1 bed units the total of 2-4 bed units is 597, which equates to potential childcare requirement of c. 160 no. children. It is estimated that the creche of c. 778 sq. m can cater for in the order of 172 children having regard to an accepted industry average of c. 4-5 sq. m gross floor space (gross) per child (4.5 sq. m) depending on the type of childcare offered by the end user.
- 6.44 Planning applications for childcare and early educational facilities should include full details in order to allow understanding of the nature and extent of the proposed development. Planning applications will be assessed on the basis of the following factors:

Nature of the facility (full day care, sessional, after school, etc.);	Full day care
Number of children to be catered for;	Up to 172
Number of full-time and part-time staff;	Staff as required depending on end user mix of children
Intended hours of operation;	07.00-19.00 operating hours

Impact on residential amenity, taking into account factors such as noise, traffic and parking;	The facility would primarily serve residents of Graydon and this SHD application and is located in Graydon. It is not anticipated that the proposal would attract additional car trips
Suitability of the site for the type and size of facility proposed;	The site is located at a convenient location, easily accessible using the existing and proposed road, cycle and pedestrian network. Also located between existing School and future school sites.
Availability of indoor and outdoor play space;	Indoor and outdoor play space is provided – located close to Taobh Chonaic which will provide further open space.
Accessibility to public transport, walking and cycling routes	The site is located at a convenient location, easily accessible using the existing and proposed road, cycle and pedestrian network and to bus stops on the Main Street.
Local traffic conditions;	Not anticipated to be an issue having regard to the TTA submitted with the application.
Access, car parking and drop off facilities for staff and customers.	13 no. car parking spaces are assigned for the creche (as part of Graydon) No additional spaces are provided notwithstanding the increase in the size of the permitted creche. Cycle parking is provided as well.

**6.14 The Delivery of Sustainable Neighbourhoods ‘The Plan Approach’**

6.45 Section 5.2.1 outlines eight key principles to be applied to all new developments in the County.

**Figure 6.6 – The Plan Approach – Eight Key Principles**



1. Context: Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area

Response: The proposed development has had regard to the Burgage Field Plot system in the layout where the design response is to include 2 no. 5 storey apartment buildings within the hedgerows. This design approach maintains the green infrastructure element (hedgerows) and ensures their long term longevity as they will be in the public realm an maintained. This is in contrast to the approach of including houses within the plot where it would be difficult to enforce the maintenance of the hedgerows if they were in private ownership.

2. Healthy Placemaking: Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.

Response: The proposed development includes a series of high quality designed well connected public spaces (some 1.71 hectares), which will deliver Sean Feirm Park, centrally located within the scheme. In addition, the proposed development will include a north-south shared green route

(cycle/footpath). The open spaces and green route are overlooked through careful design where houses front onto open spaces, ensuring passive surveillance and safe areas.

3. Connected Neighbourhoods Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods.

Response: The layout of the development is permeable and includes footpaths and cycleways which will promote safe walking and cycling; the layout provides connections to the north (to the Main Street, ultimately through St. Finian’s way), to the east to Graydon, and to the west to Athgoe Road. The subject lands will be within walking distance of c. 500m to public transport on the Main Street (Bus). We refer the Board to the Mobility Management Plan prepared by DBFL Consulting Engineers, included with the application.

4. Thriving Economy Ease of access to and availability of good jobs and a good quality of life for the community at large.

Response: The settlement has nearby economic assets which provide key services to the County and wider Dublin Region. Greenogue Business Park, located east of Newcastle less than 1km from the core area, is contiguous to the settlement boundary and in 2016 accommodated an estimated 2,940 jobs. When added to the settlement figure, the jobs to residents figure ratio is 2.25. Since then, the remaining undeveloped employment lands within the Business Park have developed further with potential to increase the jobs figure further.

In addition, Citywest Business Campus is located c. 5.5km to the southwest, which is also a major employment location in the area. Other employment locations include Peamount Hospital, located c. 2.5km to the north and Profile Park some 4km to the northwest.

5. Inclusive and Accessible High quality services, community infrastructure and open spaces accessible to all.

Response: The proposed development includes a creche of c. 778 sq. m (located in Graydon) along with c. 1.71 ha of accessible open space areas. The SHD ‘Graydon’ Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces, which includes a pitch and MUGA (as well as allotments). Young Children’s Area Play (YCAP) have been incorporated into the smaller local open spaces at Ballynakelly West Park and Ballynakelly West Square. Neighbourhood & Local Equipped Play Areas (NEAP & LEAP combined) have been incorporated into the initial phase of Taobh Chnoic Park. A further, fully equipped playground is being provided at Ballynakelly Park in consultation with South Dublin County Council.

The layout connects to existing and under construction (supermarket) on the main street. It is further noted the development by Cairn (Graydon) to the east, has reserved a site for a Primary School. The east west connection that will be completed by this SHD will provide enhanced access across the southern part of the LAP to the existing St. Finian’s School and the future Primary School site. The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian’s way). The north south green link is parallel to the Burgage Hedgerow plot which will form a biodiversity corridor.

St. Finian’s GAA has a pitch located from the Aylmer Road to the north east of the town. A 5 a side all weather pitch and full size all weather soccer pitch is located on College Road (Peamount United FC). In addition, St. Finian’s Community centre is located to the north of the development on the Main Street. Additional community space was provided in the Supermarket application.

6. *Public Realm: A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play*

Response: The design of the development will create a sense of place, providing a distinctive residential development, which takes into account the existing green infrastructure and Cultural Heritage, through the retention of the Burgage Plots and including a series of open spaces (Tower Park), Sean Feirm Park), within a high quality public realm, designed by Murray Associates. The design includes passive and active recreation within the green spaces, which are overlooked, providing passive surveillance.

7. *Built Form and Mix Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure*

Response: The proposed development includes a range of heights from 2 storey dwellings in the western portion of the subject lands, to 3 storey duplex apartments in the southern part of the site, as well as 2 no. 5 storey apartments, located centrally within the site (with the 'expansion area' of the LAP). The design intent is to locate the apartment buildings entirely within the Burgage Hedgerow Plots, so as to ensure that they can be absorbed into the immediate context, without impacting on sensitive receptors in the environs. The area will be well connected to the existing bus routes on the Main Street, as well as existing services within Newcastle.

8. *Design and Materials High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.*

Response: The proposed development provides a range of robust materials and finishes within high quality landscaped areas. Further detail is provided in the Building Lifecycle Report as well as the MOLA Architectural Design Report and the Murray Associates Landscape Design Report.

6.46 In this regard we refer the Board to the MOLA "The Plan Approach" Report which provides further detail on the key principles.

### 6.15 Building Height and Density Guide

6.47 Section 5.2.7 of the Plan sets out the Density and Building Height Policies and objectives (see section 6.5 above) and notes that in response to Urban Development and Building Height Guidelines (2018), and in particular SPPR1, the plan is accompanied by South Dublin County's Building Height and Density Guide (appendix 10).

6.48 The Plan highlights that *"The premise of these guidelines is not intended to introduce height for the sake of height, but to introduce and consider increased heights and densities as a means of accommodating greater residential populations within the County's serviced and zoned land banks in particular where public transport, employment and other services are proximate to a development proposal in line with the principals of compact growth."*

6.49 The Plan promotes a *"Context Driven Approach to Height"*, which acknowledges that *"this is in line with the Urban Development and Building Height Guidelines and specifically SPPR1 which prohibits numerical limitations on building height by planning authorities."*

6.50 The BHDG set out a framework for the analysis of building heights relative to their context. Therefore, proposals for increased building heights can be expressed in terms of their amplification of prevailing heights by means of a Contextual Height Ratio, noting that *"Such a measure provides a clear indication of the scale of change proposed in the built environment without utilising the more subjective terminology of tall/ taller or high/ higher buildings."*

6.51 In this regard the prevailing heights in the wider area are predominantly 2 and 3 storeys, and it is noted the permitted Graydon development (under construction) to the east will include a 4 storey building. Therefore the contextual height ratio for the subject lands is (1.67 x CH) for 3 storeys and (1.5 x CH) for 4 storeys and (2.5 x CH) for 2 storey dwellings. For the 3 storey duplex buildings, the contextual height ratio is (1 x CH) when referenced against 3 storey dwellings and (1.5 x CH) for 2 storey dwellings.

6.52 Having regard to the above, it is considered that the proposed height is relatively modest noting that they apartments will be located centrally within the scheme, away from existing buildings, and can be readily absorbed into the emerging context of the current proposal and the adjoining Graydon development (under construction).

6.53 The purpose of the Building Height and Density Guide (BHDG) is:

*1. To address the requirement under SPPR1 of the Urban Development and Building Height Guidelines (2018) and the need for planning authorities to explicitly identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and*

*2. To provide a toolkit for the assessment of proposed increased building heights in development application and development management scenarios.*

6.54 The BHDG supports the objective of the Plan (in line with NPO35 and SPPR1 *"to proactively consider increased building heights on lands zoned Regen, MRC, DC, LC, TC and Res-N as well as sites identified and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin Building Height and Density Guide that it is contextually appropriate to do so."*

6.55 The subject lands are zoned Res-N and as such increased heights are supported in principle in the BHDG.

6.56 Section 4 of the BHDG provides a contextual analysis toolkit, the purpose of which is *"to guide applicants through a process of contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development."*

6.57 Section 5 of the BHDG describes a number of notional development scenarios based on typical contexts found across the South Dublin County Council administrative area wherein increased building heights and higher densities might be accommodated. The aim of these indicative scenarios is not to determine the appropriate height for a development proposal but instead to demonstrate how such a determination might be illustrated and rationalised.

6.58 We refer the Board to the MOLA Architectural Design Report (in response to Item no. 5 of the Opinion of An Bord Pleanála, which provides detail in relation to the contextual analysis toolkit.

**7.0 CONSISTENCY WITH SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2016 – 2022**

- 7.1 The site is located within the administrative area of South Dublin County Council. At the time of lodgement the 2016-2022 Plan was still in operation. However the 2022-2028 Plan will likely be the Plan which the proposal will be assessed on when a decision is made by An Bord Pleanála which is set out in Section 6.
- 7.2 Figure 1.1 and Table 5.2 of the CDP identifies Newcastle as a Small Town in the County Settlement Hierarchy. The following policies and objectives are noted:

**CORE STRATEGY (CS) Policy 4 Small Towns**

**It is the policy of the Council to support the sustainable long term growth of Small Towns based on local demand and the ability of local services to cater for growth.**

**CS4 Objective 1:**  
To support and facilitate development on zoned lands on a phased basis subject to approved Local Area Plans.

**CS4 Objective 2:**  
To provide sufficient zoned land to accommodate services, facilities, retail and economic activity.

- 7.3 The proposed development will deliver new residential accommodation on an underdeveloped site c. 550m to the south-west of the Newcastle Town Centre (i.e. central T-junction between the R405 and R120 roads). The proposal will be located on an underutilised urban-infill site adjacent to Newcastle Town Centre, which will provide retail, commercial and other community services and facilities to the future residents of the scheme.
- 7.4 As shown below, Table 1.6 of the Core Strategy of CDP projects a total population of 129,022 people within the Local Area boundaries by 2021. This translates to a need for 30,723 houses by 2021.

**Figure 7.1 - South Dublin RPG Housing Allocation/Estimated CSO Requirement**

	2015	2016	2021	2022	2026	2028	2031
<b>RPG Targets</b>	98,299	115,373	134,186	137,948			
<b>CSO</b>	98,299	109,462	129,022	130,431	136,069	137,404	142,741

**Figure 7.2– South Dublin Housing Required to Meet Growth Scenario**

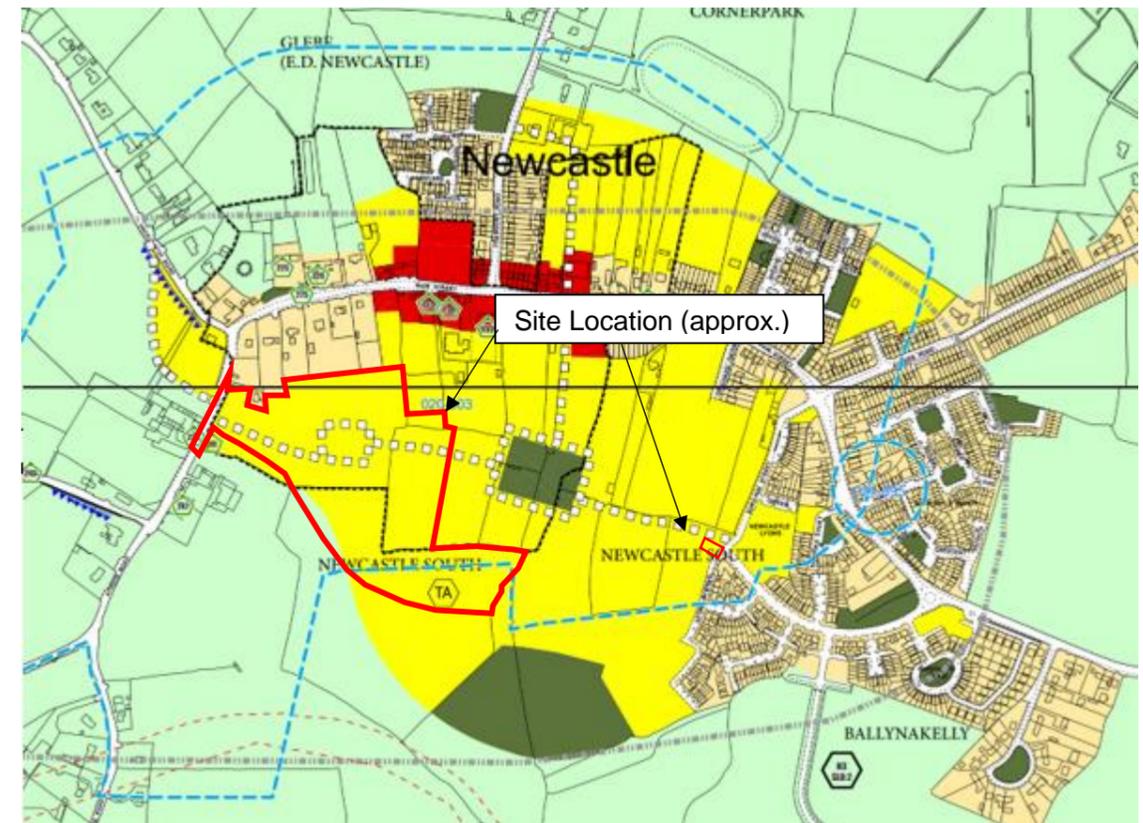
	2015	2016	2021	2022	2026	2028	2031
<b>RPG Targets</b>		17,074	35,887	39,649			
<b>CSO</b>		11,163	30,723	32,132	37,770	39,105	44,442

- 7.5 As noted above, the subject site is located within an area identified as Small Town. The CDP identifies in Table 1.8 that undeveloped lands in the area have the capacity to provide for 701 units. The subject proposal will provide 280 dwellings, contributing much needed housing to the area.

**7.1 Land Use Zoning**

- 7.6 The relevant development plan is the South Dublin County Development Plan 2016 – 2022. The subject site is zoned ‘Objective RES-N’ - ‘To provide for new residential communities in accordance with approved area plans’.
- 7.7 The location of the site in the context of the land use zoning objectives map within the Development Plan is illustrated below, with the site boundary outlined in red.

**Figure 7.3 – Land Use Zoning Map (South Dublin County Development Plan)**



**USE ZONING OBJECTIVES**

- Objective RES To protect and/or improve residential amenity
- Objective RES-N To provide for new residential communities in accordance with approved area plans
- Objective VC To protect, improve and provide for the future development of Village Centres
- Objective OS To preserve and provide for open space and recreational amenities
- Objective RU To protect and improve rural amenity and to provide for the development of agriculture and Dublin Mountains areas

- S Proposed School
- ⬡ Specific Local Objectives
- TA To Provide For Traveller Accommodation (indicative sites)
- Contour Lines
- NTA Greater Dublin Cycle Network Plan
- Road Proposals - 6 Year
- Protect and Preserve Significant Views
- Sites and Monuments Record Zone of Notification

- 7.8 It is noted there is an indicative Traveller Accommodation ‘TA’ objective located to the south of the Newcastle. Cairn have been in discussions with the Housing Department of South Dublin County Council and suitable housing has been included in the Part V proposals. With reference to the zone of archaeology testing has been undertaken by IAC, the detail of which is included in the EIAR and associated appendices.

## 7.2 Relevant Policies

**Table 7.1 – Consistency with Relevant Policies for Core Strategy**

Policies/Objectives for Core Strategy	Consistency
CORE STRATEGY (CS) Policy 4 Small Towns It is the policy of the Council to support the sustainable long term growth of Small Towns based on local demand and the ability of local services to cater for growth. CS4 Objective 1: To support and facilitate development on zoned lands on a phased basis subject to approved Local Area Plans	The proposed development of the LAP lands is being undertaken in tandem with the delivery of necessary services. A justification is provided in the Statement of Material Contravention, prepared by John Spain Associates, submitted with the application.
CORE STRATEGY (CS) Policy 6 Local Area Plans CS6 Objective 2: To support a plan led approach in Local Area Plan areas by ensuring that development complies with the specific local requirements of the Local Area Plan, in addition to the policies and objectives contained in this Development Plan.	The proposed development is in compliance with national guidelines in relation to density and height, and road layout but not the LAP. A justification is provided in the Statement of Material Contravention, prepared by John Spain Associates, submitted with the application.

**Table 7.2 – Consistency with Relevant Policies for Housing**

Policies/Objectives for Housing	Consistency
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).	The proposed development will provide 10% dwellings in accordance with Part V of the Planning and Development Act as amended.
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.	The proposed development includes Part V dwellings along with apartments, houses and duplex apartments in a sustainable and balanced mix.
H1 Objective 5: To ensure that those with specific housing needs, such as older persons, persons with disabilities, homeless persons and Travellers, are accommodated in a manner appropriate to their specific needs. The redevelopment of the Oldcastle Park Traveller Accommodation Site should be prioritised.	Cairn have been in discussions with the Housing Department of South Dublin County Council and suitable housing has been included in the Part V proposals. A letter from South Dublin County Council confirming acceptability of the proposals is included with the application.
H5 Objective 2: To ensure that Traveller Accommodation is located in proximity to services, including public transport.	
H5 Objective 3: To provide long term sustainable Traveller Accommodation developments, while ensuring proper provision of infrastructure.	
H7 Objective 1: To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).	
H7 Objective 2: To ensure that residential development provides an integrated and balanced approach to movement, place-making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).	The proposed layout has been designed in accordance with DMURs as set out above in section 5 and in the DMURS compliance document prepared by DBFL submitted with the planning application.
Housing (H) Policy 6 Sustainable Communities & Housing (H) Policy 7 Urban Design in Residential Developments seek to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.	Section 3 of this Statement of Consistency provides detail on how the proposal is consistent with relevant Government Guidance.
Housing (H) Policy 8 Residential Densities 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).	The proposed density of c. 33.1 units per hectare Gross (37.1 net) is appropriate for a partial centrally located site and edge of centre site for a small town as set out in the Sustainable Residential Density Guidelines 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).	The apartments are located centrally within the site, close to the town centre and connections to the main street and its amenities.
H8 Objective 5: To ensure that developments on lands for which a Local Area Plan has been prepared comply with the local density requirements of the Local Area Plan.	The proposed development is in compliance with national guidelines in relation to density but not the LAP. A justification is provided in the Statement of Material Contravention, prepared by John Spain Associates, submitted with the application.
H8 Objective 6: To apply the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) relating to Outer Suburban locations, including a density range of 35-50 units per hectare, to greenfield sites that are zoned residential (RES or RES-N) and are not subject to a SDZ designation, a Local Area Plan and/or an approved plan, excluding lands within the M50 and lands on the edge or within the Small Towns/ Villages in the County	The proposed development is in compliance with national guidelines in relation to density but not the LAP. A justification is provided in the Statement of Material Contravention, prepared by John Spain Associates, submitted with the application.
Housing (H) Policy 9 Residential Building Heights H9 Objective 1: To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity. H9 Objective 2: To ensure that higher buildings in established areas respect the surrounding context. H9 Objective 3: To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).	The development includes a wide range of building heights comprising 2 storey houses (45.7%), 3 storey duplex buildings (12.9%), and 5 storey apartment buildings (41.4%).  The proposed 3 storey Duplex buildings and 5 storey apartments buildings are centrally located within the site and the scale decreased towards the western and norther boundaries, in keeping with the scale of adjacent dwellings.

<b>Policies/Objectives for Housing</b>	<b>Consistency</b>
Housing (H) Policy 10 Mix of Dwelling Types H10 Objective 1: Objective seeks that new residential developments provide for a wide variety of housing types, sizes and tenures.	The proposal provides a mix dwelling types, comprising houses (128 no. – 8 no. 2 bed, 94 no. 3 bed, 25 no. 4 bed & 1 no. 5 bed), duplex apartments (18 no. 2 bed & 18 no. 3 bed) and apartments (54 no. 1 bed, 88 no. 2 bed).
Housing (H) Policy 11 Residential Design and Layout 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	The MOLA HQA and Architectural Design Report, along with the Murray Associates Landscape Design set out the high-quality layout of the proposed development.
Housing (H) Policy 12 Public Open Space 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..	The proposed development will provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares. The proposed open space for the development at 22.2% therefore meets and exceeds the open space requirements as set out in the Development Plan (14%).
Housing (H) Policy 13 Private and Semi-Private Open Space H13 Objective 1: To ensure that all private open spaces for apartments and duplexes including balconies, patios and roof gardens are designed in accordance with the qualitative and quantitative standards (including minimum balcony size and depth) set out under Sustainable Urban Housing: Design Standards for New Apartments, DECLG (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide, DEHLG (2009). H13 Objective 2: To ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of active and passive uses, in accordance with the quantitative standards set out in Chapter 11 Implementation. H13 Objective 3: To ensure that private amenity spaces for houses are designed in accordance with the quantitative standards set out in Chapter 11.0 Implementation and the qualitative standards set out under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) including the accompanying Urban Design Manual – A Best Practice Guide (2009).	The private amenity spaces of the houses and apartments exceed the Development Plan standards and the Apartment Guidelines standards. Furthermore, it is proposed to provide additional communal open space areas of 1,177 sq. m and 779 sq. m respectfully which is nearly twice the required provision.
Housing (H) Policy 14 Internal Residential Accommodation 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 internal space of the houses and the Apartments meet the requirements of the County Plan and Apartment Guidelines 2020 as set out in the MOLA HQA and in section 5.2 of this document.
HOUSING (H) Policy 15 Privacy and Security H15 Objective 1: To ensure that there is a clear definition between private, semi-private and public open space that serves residential development. H15 Objective 2: To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and spaces. H15 Objective 3: To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. H15 Objective 4: To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.	Appropriate demarcation between different open space typologies is provided within the Landscape Design (as set out in the Murray Associates material).  The proposed development includes a series of public open spaces distributed evenly throughout the subject site, which are overlooked; with passive surveillance incorporated into the design.  Communal open space is provided to the apartment buildings and the duplex buildings which is of a high quality and integrated into the overall landscape design. The distance between the apartment buildings is c. 33m

### 7.2.1 Community Infrastructure

**Table 7.3 Consistency with Relevant Policies for Community Policies**

<b>Policies/Objectives Community</b>	<b>Consistency</b>
COMMUNITY INFRASTRUCTURE (C) Policy 1 Community Centres C1 Objective 4: To ensure that community facilities are provided in new communities on a phased basis in tandem with the provision of housing in accordance with approved Local Area Plans or Planning Schemes.	A creche of c. 778 sq. m is provided on lands located in Graydon, to the east, which will cater for both Graydon and this SHD development.

<b>Policies/Objectives Community</b>	<b>Consistency</b>
COMMUNITY INFRASTRUCTURE (C) Policy 8 – Childcare Facilities C8 Objective 1: To support and facilitate the provision of childcare infrastructure at suitable locations such as town, village, district and local centres, adjacent to school sites and in employment areas. 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 proposal includes a creche 778 sq. m as well as extensive areas of public open space and is located close to existing community facilities such as St. Finian's Community centre on the main street and to the Primary School to the west.
COMMUNITY INFRASTRUCTURE (C) Policy 9 – Primary & Post-primary Facilities C9 Objective 3: To reserve sites for primary and post-primary school provision in developing areas through approved Local Area Plans and Planning Schemes, in consultation with the Department of Education and Skills. C9 Objective 4: To require schools 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.	A primary school site has been reserved within the Graydon Development to the east, by Cairn. There is an existing Primary School (St. Finian's) located adjacent to the subject lands to the east.
COMMUNITY INFRASTRUCTURE (C) Policy 12 Open Space C12 Objective 3: To develop parks and open/green spaces that cater for the diverse needs of the County's population, in particular different age groups and abilities, through the facilitation of both active and passive recreational activities and universal access	Formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities are provided in the Landscaping Design by Murray Associates.

## 7.2.2 Building Heights in Urban Centres

**Table 7.4 Consistency with Relevant Policies for Building Heights in Urban Centres**

<b>Policies/Objectives Building Heights in Urban Centres</b>	<b>Consistency</b>
URBAN CENTRES (UC) Policy 6 Building Heights It is the 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.	The proposed 3 storey Duplex buildings and 5 storey apartments buildings are centrally located within the site and the scale decreased towards the western and norther boundaries, in keeping with the scale of adjacent dwellings.

## 7.2.3 Transport and Mobility

**Table 7.5 – Consistency with Relevant Policies for Transport and Mobility Objectives**

<b>Policies/Objectives Transport and Mobility Objectives</b>	<b>Consistency</b>
Transport and Mobility (TM) Policy 3 Walking and Cycling TM3 Objective 1: To create a comprehensive and legible County-wide network of cycling and walking routes that link communities to key destinations, amenities and leisure activities with reference to the policies and objectives contained in Chapter 9 (Heritage, Conservation and Landscape) particularly those that relate to Public Rights of Way and Permissive Access Routes. TM3 Objective 2: To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities. TM3 Objective 3: To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists within a safe and comfortable environment for a wide range of ages, abilities and journey types.	The proposal includes cycle and footpath facilities throughout the development including a greenlink, all to promote connectivity to the town centre to the north, 'Graydon' to the east and Athgoe Road to the west.  The proposed development has been designed in accordance with DMURS, which is set out above in section 5.0 and in the DMURS compliance document prepared by DBFL Consulting Engineers.
Transport and Mobility (TM) Policy 6 Road and Street Design TM6 Objective 1: To appropriately apply speed limits taking into account the characteristics of the surrounding area, the design of the street environment and the presence of vulnerable users. TM6 Objective 2: To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self regulating street environment. TM6 Objective 4: To prioritise safety at rural junctions.	The proposed layout has been designed in accordance with DMURS. Please refer to DBFL Consultant Engineers' DMURS Compliance Statement, and Traffic and Transportation Assessment for further detail.  A new junction is provided on the Athgoe Road, which includes footpaths linking to the existing footpath network.
Transport and Mobility (TM) Policy 7 Car Parking TM7 Objective 1: To carefully consider the number of parking spaces provided to service the needs of new development. TM7 Objective 3: To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape. TM7 Objective 4: To make provisions for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and land owners.	The proposed development layout design provides a total of 423 no. car parking spaces comprising 251 no. for the houses, 172 no. for the apartment / duplex units. 13 no. car parking spaces are assigned for the creche (as part of Graydon) No additional spaces are provided notwithstanding the increase in the size of the permitted creche. A total of 38 no. electrical vehicle car parking spaces are proposed which equates to 21% of the apartment / duplex car parking provision. It is assumed that residents of the housing units can utilise their private power supply to charge electric vehicles parked in-curtilage.

## 7.2.4 Infrastructure and Environmental Quality

**Table 7.6 – Consistency with Relevant Policies for Infrastructure and Environmental Quality**

Policies/Objectives Infrastructure and Environmental Quality	Consistency
<p>INFRASTRUCTURE &amp; ENVIRONMENTAL QUALITY (IE) Policy 2 Surface Water &amp; Groundwater</p> <p>IE2 Objective 4: To incorporate Sustainable Urban Drainage Systems (SUDS) as part of Local Area Plans, Planning Schemes, Framework Plans and Design Statements to address the potential for Sustainable Urban Drainage at a site and/or district scale, including the potential for wetland facilities.</p> <p>IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.</p> <p>IE2 Objective 8: To protect salmonid water courses, such as the Liffey and Dodder Rivers catchments (including Bohernabreena Reservoir), which are recognised to be exceptional in supporting salmonid fish species.</p>	<p>Where possible, attenuation facilities have been designed as above ground storage in order to maximize the use of SuDs and limit the requirement of underground tanks to promote biodiversity. Swales will be utilised as a SuDs measure where possible to drain adjacent roads and greenlinks. Swales and other SuDs measures such as tree pits, permeable paving and green roofs have been incorporated into the drainage design to reduce the run-off volume and improve run-off water quality. We refer the Board to Chapter 6 (water) of the EIAR along with the IDR prepared by DBFL.</p>
<p>INFRASTRUCTURE &amp; ENVIRONMENTAL QUALITY (IE) Policy 3 Flood Risk</p> <p>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.</p>	<p>A Site Specific Flood Risk Assessment has been carried out by DBFL in accordance with the Flood Risk Guidelines and in accordance with the precautionary principle which confirms the development is at low risk of flooding.</p>
<p>INFRASTRUCTURE &amp; ENVIRONMENTAL QUALITY (IE) Policy 4 Information and Communications Technology (ICT)</p> <p>IE4 Objective 3: To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.</p>	<p>The existing mobile network coverage in Newcastle is poor. The propose development includes infrastructure on the roof of the apartment buildings which will improve coverage in the area. This is set out in the ISM report, included with the SHD application.</p>
<p>INFRASTRUCTURE AND ENVIRONMENTAL QUALITY (IE) Policy 8 Casement Aerodrome</p> <p>IE8 Objective 1: To ensure the safety of military air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities.</p> <p>IE8 Objective 2: To maintain the airspace around the aerodrome free from obstacles to facilitate aircraft operations to be conducted safely, including restricting development in the environs of the aerodrome.</p> <p>IE8 Objective 3: To implement the principles of shielding in assessing proposed development in the vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority 'Guidance Material on Aerodrome Annex 14 Surfaces (2015)'.</p> <p>IE8 Objective 4: To prohibit and restrict development in the environs of Casement Aerodrome</p> <p>IE8 Objective 5: Within the Department of Defence Inner Zone (delineated on Development Plan Index Map), in addition to the Obstacle Limitation Surfaces for the Aerodrome, no buildings or structures exceeding 20m in height above ground level should be permitted except where specifically agreed following consultation with the Department of Defence that the proposed development will not affect the safety, efficiency or regularity of operations at the aerodrome.</p> <p>IE8 Objective 6: To limit residential development and other land uses impacted by noise, such as nursing homes, schools, hospitals and conference centres within the Noise Significant Area Boundary delineated for Casement Aerodrome, subject to an appropriate noise assessment and mitigation measures to protect residential amenity.</p>	<p>An Aviation Safety Assessment submitted with this application has been carried out by O'Dwyer Jones which confirms that the development complies with the requirements.</p>

## 7.2.5 Green Infrastructure

**Table 7.7 – Consistency with Relevant Policies for Natural Heritage Objectives**

Policies/Objectives	Consistency
G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments	The proposed development integrates the Green Infrastructure including the Burgage plots into the scheme. We refer the Board to the enclosed Landscape Design Report by Murray Associates.
G2 Objective 7: To incorporate items of historical or heritage importance in situ within the Green Infrastructure network as amenity features	The proposed development retains the historical Burgage Field Plot system into the design of the development.
G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.	We refer the Board to the preliminary Tree Survey by CMK. The objective is to retain as many trees as possible including the Burgage plot system, which is incorporated into the design.
G2 Objective 10: To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.	The proposal includes a network of paths and cycle tracks including a north south green route all which link to 'Graydon' to the east, the boundary to the north and the Athgoe Road to the west.
G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.
G4 Objective 1: To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces. G4 Objective 3: To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.	The proposed development will provide for a connected series of public open spaces and amenity Green Infrastructure areas measuring c 1.71 hectares (excluding communal open space). The proposed open space for the development at 22.2% therefore meets and exceeds the open space requirements as set out in the Development Plan (14%). SuDs measures are included in the design as set out in the DBFL IDR.
GREEN INFRASTRUCTURE (G) Policy 6 New Development in Urban Areas G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems. G6 Objective 3: To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management	SUDs are proposed in an integrated design which is set out in the DBFL Infrastructure Design Report.  The design includes swales which will enhance biodiversity and will provide for sustainable water management.
HCL15 Objective 1: To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.	We refer the Board to the AA screening, prepared by Altemar and to the Biodiversity Chapter of the EIAR.

## 7.2.6 Built Heritage And Architectural Conservation

**Table 7.8 – Consistency with Relevant Policies for Built Heritage And Architectural Conservation**

Policies/Objectives Built Heritage And Architectural Conservation	Consistency
HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 1 Overarching HCL1 Objective 1: To protect, conserve and enhance natural, built and cultural heritage features and restrict development that would have a significant negative impact on these assets	The layout of the proposed development has taken into account the Burgage Plots in Newcastle as well as the archaeological and Architectural heritage. The Cultural Heritage Chapters of the EIAR provides further detail.
HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 2 Archaeological Heritage HCL2 Objective 1: To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document. HCL2 Objective 2: To ensure that development is designed to avoid impacting on archaeological heritage that is of significant interest including previously unknown sites, features and objects. HCL2 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.	The proposed development will not impact on sites, monuments and features of significant historical or archaeological interest. Some minor features were found as part of the Archaeological investigations, which will be preserved by record as set out in the IAC EIAR Cultural Heritage Chapter.  With reference to the Tower House, the layout improves the indicative design in the LAP and includes a further set back in the form of a park and moves the road further to the north away from the protected structure.
HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 3 Protected Structures	Response as per HCL2 Objective 3.

<p>HCL3 Objective 1: To ensure the protection of all structures (or parts of structures) and the immediate surroundings including the curtilage and attendant grounds of structures contained in the Record of Protected Structures.</p>	
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 7 Landscapes                  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.</p>	<p>The proposed development is located within the development boundary of Newcastle and has been sensitively designed so that the visual impact of the proposal has been mitigated through careful siting of the apartment buildings centrally within the site. The LVIA Chapter of the EIAR which provides an assessment of the proposed development.</p>
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 12 Natura 2000 Sites                  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.</p>	<p>We refer the Board to the AA Screening by Altemar, which concludes that “<i>On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.</i>”</p>
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 15 Non-Designated Areas                  HCL15 Objective 1: To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.                  HCL15 Objective 2: To ensure that, where evidence of species that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.                  HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council’s Tree Management Policy 2015-2020</p>	<p>We refer the Board to the Biodiversity Chapter of the EIAR and associated Bat report prepared by Altemar. Measures to mitigate and improve biodiversity on site are contained in the landscaping proposals and the EIAR.                   The proposed development incorporates the Burgage plot boundaries into the development layout and green infrastructure.</p>

**7.2.7 Energy**

**Table 7.9 – Consistency with Relevant Policies Energy**

Policies/Objectives Energy	Consistency
<p>ENERGY (E) Policy 2 South Dublin Spatial Energy Demand Analysis It is the policy of the Council to implement the recommendations of the South Dublin Spatial Energy Demand Analysis (SEDA) in conjunction with all relevant stakeholders, promoting energy efficiency and renewable energy measures across the County.                  E2 Objective 7: To require, where feasibly practical and viable, the provision of PV solar panels in new housing and apartment builds, for electricity generation/storage and/or water heating, so as to reduce the long term energy/heating costs of residents living in such dwellings, to minimise carbon emissions and to reduce Ireland’s dependency on imported energy derived from fossil fuels.</p>	<p>The proposed development includes Solar PV panels located on the roofs.</p>
<p>ENERGY (E) Policy 4 Energy Performance in New Buildings                  It is the policy of the Council to ensure that new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are considered 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.</p>	<p>The proposed development will be built to the highest possible standard of energy efficiency. The building services design strategy for the proposed development utilises as many sustainable design options and energy efficient systems that are technically, environmentally and economically viable for the project to achieve a low energy and environmentally friendly development, while also providing suitable dwellings to meet current market demands.                  A green roof will be provided for sections of roof areas as outlined in the Architectural and Landscape Drawings.                  Please see Energy Report carried out by Waterman Moylan.</p>

**7.3 Development Management Standards – South Dublin County Development Plan 2016-2022**

**7.3.1 Implementation**

7.9 Chapter 11 sets out development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development is in accordance with proper planning and sustainable development.

7.10 We note the following key areas:

- Place Making & Urban Design
- Development Management Thresholds
- Housing
- Transport and Mobility
- Refuse Storage & Recycling Facilities in Developments

Policies/Objectives	Consistency
Place Making and Urban Design	
<b>11.2.1 DESIGN STATEMENTS</b>	
<p><i>All medium to large scale development proposals (10 dwellings and above and/or commercial, retail or community developments of 1,000 sq. metres and above, or as otherwise required), shall be accompanied by a Design Statement. The Design Statement should consist of:</i></p> <p><i>A Site Analysis</i></p> <p><i>A Concept Plan and/or Masterplan</i></p> <p><i>A statement based on the design criteria set out in the relevant National Planning Guidance documents listed in Section 11.2.0 and/or tables 11.17 and 11.18 as outlined below.</i></p> <p><i>A statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets.</i></p>	<p>The proposed development includes an Architectural Design Report prepared by MOLA Architects which sets out the rationale and design considerations for the development.</p> <p>A Statement of Consistency with DMURS has also been prepared by DBFL Consulting Engineers.</p> <p>A Quality Audit is submitted by Burton Engineers and recommendations have been taken into account in the design.</p>

**Residential Building Heights**

7.11 Objective 1 seeks to encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity. The proposed scheme provides a range of building heights and forms and is considered compliant with this objective.

7.12 It is noted that Objective 4 seeks to direct taller buildings of more than five storeys to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme. The subject site is zoned 'Objective RES-N' - *'To provide for new residential communities in accordance with approved area plans'*.

7.13 In this regard, the proposed development includes two apartment buildings of 5 storeys and 3 no. 3 storey duplex buildings. The location of the 5 storey apartment blocks are positioned strategically, centrally within the subject site, within the hedgerows.

**7.3.1.1 Housing**

**Mix of Dwelling Types**

7.14 Section 11.3.1 of the Development Plan sets out guidance in regard to 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. The development includes a wide range of building heights comprising 2 storey houses (43.3%), 3 storey duplex buildings (12.7%), and 5 storey apartment buildings (43.8%). The proposal provides a mix dwelling types, comprising houses (123 no. – 6 no. 2 bed, 104 no. 3 bed & 13 no. 4 bed), duplex apartments (18 no. 2 bed & 18 no. 3 bed) and apartments (38 no. 1 bed, 76 no. 2 bed & 10 no. 3 bed).

7.15 The proposed wide mix of units have been demonstrated to meet potential market demand and are well suited for the area.

**Residential Density**

7.16 The Development Plan outlines that that the density of the site should be determined with reference to the Sustainable Residential Development in Urban Areas Guidelines (2009). The details of these guidelines have been outlined and applied to the subject development in section 5.0.

7.17 In addition to this, the development plan stated that new developments should be greater than 35 dwellings per hectare. The proposed development, located within a public transport corridor is in compliance with this objective.

7.18 The development plan outlines that that the density of the site should be determined by the 2009 Sustainable Residential Development in Urban Areas Guidelines. The details of these guidelines have been outlined and applied to the subject development in section 5.12.1 and the overall density of c. 33.1 units per hectare Gross (37.1 net), is considered appropriate for the greenfield site.

**Public Open Space/ Children’s Play**

7.19 In keeping with the development plan, Murray Associates Landscape Architects have submitted a Landscape plan for this development. The overall development has been pivoted, physically and from a design perspective, around 4 no. key parks – Sean Feirm Park, Park 1, Park 2 and Park 3. These parks are accessible from all areas of the development through a permeable road/path layout while the paths are also served by a small network of greenways, primarily along the boundaries of the development.

7.20 The plan requires a minimum of 14% open space on lands, such as the subject site, that are designated Zoning Objective RES-N as part of a development. The proposed development has c. 1.71 hectares of open space (22.2%) of the site area.

7.21 As part of the Councils Five Year Play Space Programme, each new residential development is required to incorporate a children’s play area as part of the landscape plan. In developments over 50 units, this space is required to be a formal provision, supervised and accessible. The proposal includes a children’s play area within the communal courtyards. This detail is set out in the Murray Associates Landscape Architects Design Statement and associated drawings, included with the SHD application.

**Dwelling Standards**

7.22 We refer the Board to the Housing Quality Assessment prepared by MOLA Architects which sets out how the proposed development complies with the Design Standards for New Apartments. We also refer to Section 5.2 which sets out response to these Guidelines in full.

**Dual Aspect**

- 7.23 The development plan deferred the guidance on Dual Aspect ratios to the Design Standards for New Apartments. These guidelines state that 50% of apartment units are required to be dual aspect in urban areas. The proposed development provides 50% dual aspect.

#### **Access Cores and Communal Areas**

- 7.24 In apartments schemes, own door access should be facilitated where possible. Where shared access lobbies do occur, the number of units served by one entrance should be minimised. As part of this development, shared lobbies have been limited when possible and the inclusion of own door units has been provided where possible and with the addition of live/work and duplex units.

#### **Privacy**

- 7.25 The development provides for appropriate separate distances between dwellings at 22m. This maintains a high level of privacy and amenity obtained by residents and reduced the level of overlooking and overshadowing. Separation distances of greater than 35m is achieved between the proposed apartments and duplex apartments.

#### **Clothes Drying Facilities**

- 7.26 Ventilated areas for drying and washing clothes are provided in each apartment. The proposed units have adequate space for clothes washing and drying facilities.

#### **Access Cores and Communal Areas**

- 7.27 In apartments schemes, own door access should be facilitated where possible. Where shared access lobbies do occur, the number of units served by one entrance should be minimised. As part of this development, shared lobbies have been limited when possible and the inclusion of own door units has been provided where possible and with the addition of houses and duplex units.

#### **Transport and Mobility**

- 7.28 Tables 11.23 and 11.24 of the Development Plan set out the Maximum Parking rates for residential development. Parking rates are divided into two main categories, Zone 1 and Zone 2. The subject development is located in Zone 2, the proposed car parking is below that of the development plan, which are considered maximum standards. Please see the Transport Report by DBFL Consulting Engineers.

- 7.29 Tables 11.22 of the Development Plan set out the Maximum Cycle Parking rates for residential development however these standards are now superseded by the Design Standards for New Apartment Guidelines for Planning Authorities (December 2020) A total of 363 number residential bicycle parking spaces are proposed as part of the development scheme comprising 236 no. long stay secured / sheltered spaces for the apartment / duplex units and 94 no. short stay parking spaces for the apartment / duplex units.

#### **EV Charging**

- 7.30 The Electric Transport Programme (2008) contains a target for 10% of the national road transport fleet to be electrically powered by 2020.
- 7.31 To facilitate the use of electrically operated cars and bicycles in line with National Policy, the proposed development includes facilities for the charging of battery-operated cars. All car parking spaces within the development shall be 'future-proofed' by the inclusion of ducting and/or cabling to permit the rapid future installation of EV charging points.

#### **Transport and Traffic Assessments**

- 7.32 Section 11.4.5 requires new development to prepare Transport and Traffic Assessments (TTAs) in order to promote more efficient use of investment in transportation infrastructure, reduce travel demand and promote road safety. The TTA prepared by DBFL considers the impact of the proposed development on the local and broader street network, a rationale for the proposed level of car parking and is prepared in accordance with the Traffic and Transport Assessment Guidelines (2014).
- 7.33 The subject site has public transport availability and reduces its car parking provision, as such will not negatively impact the capacity of the local road network which will cater for all new trips to be generated by the development.

#### **Refuse Storage & Recycling Facilities in Developments**

- 7.34 Section 11.6.5 of the Development Plan sets out the location and design criteria of refuse storage and recycling facility. The proposed facilities are easily accessible for residents, will not present an odour problem and will not significantly detract from the residential amenities of adjacent property or future occupants.
- 7.35 Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the Design Standards for New Apartments (2020).

## 8.0 CONSISTENCY WITH NEWCASTLE LOCAL AREA PLAN 2012 (AS EXTENDED)

8.1 The Newcastle Local Area Plan was adopted in May 2012 and was extended until December 2022 (in October 2017). The LAP incorporates the subject lands at Newcastle South, Newcastle.

### 8.1 Green Infrastructure Strategy

**Table 8.1: Consistency with relevant LAP policies for Green Infrastructure**

Policies/Objectives for Green Infrastructure	Consistency
<b>(Objective GI1)</b> A linked open space hierarchy shall be implemented fully across the Plan Lands and all proposed developments shall contribute to the achievement of this integrated Green Infrastructure Network where relevant and at a minimum rate of 14% on A1 zoned lands. Where there is a shortfall in public open space provision, from planned local and neighbourhood parks, this shortfall shall be taken up by pocket parks that are integrated into the design of neighbourhoods. Pocket parks shall be adequately overlooked and shall be easily accessible from surrounding housing but shall not comprise residual open spaces.	The proposed development provides a series of interconnected open space areas. While there is a shortfall in the overall in public open space provision, from planned local and neighbourhood parks, this has been compensated through the additional open space provided by Cairn on their lands on the southern part of the Newcastle LAP, comprising 3.8 hectares in Graydon and 1.71 hectares in this SHD application.
All proposed public open spaces shall have a clear role and function that falls within the Plan's open space hierarchy detailed under Table 5.1 and shall comply with the qualitative standards detailed under Sustainable Residential Development in Urban Areas, 2009. (Objective GI2)	Both Sean Feirm Park and the proposed Tower Park, (which will link to future area of the Tower park on adjacent lands) have a clear hierarchy and they comply with the SRD 2009.
Play facilities shall be provided at a rate of 3 sq.m per dwelling and in accordance with Planning Guidance on Provision of Children's Play Facilities in New Developments, 2007. (Objective GI3)	Based on 280 dwellings the provision would require c. 840 sq. m whereas 650 sq. m is provided. While the proposal is in compliance with National Guidelines in relation to open space, a justification is provided in the Material Contravention Statement, prepared by John Spain Associates, included with the application.
<b>Retention, incorporation and Reinstatement of Burgage Plot Field System</b>	
<b>(Objective GI7)</b> Protect the historic burgage plot boundary and townland delineations (including townland boundaries to the Glebe, Ballynakelly Newcastle South and Commons Little) around Newcastle Village including their associated hedgerows and ditches.	The proposed development maintains the existing Burgage plot where it is proposed to provide 2 no. apartment blocks. It is considered this design solution will allow for the hedgerows to remain in the public domain and be maintained, thus ensuring their preservation and enhancement.
<b>(Objective GI8)</b> Require all planning applications for development on lands that include or are bound by burgage plot and/or townland hedgerow boundaries and ditches to clearly detail how these boundaries will be enhanced or reinstated and incorporated. All such applications shall include a comprehensive hedgerow survey and method statement (compiled by a suitably qualified person) for protection, incorporation and reinstatement of the historic boundaries before, during and after construction. This shall include for details on protecting any section(s) of hedgerow outside the application site that directly adjoin the application site.	An Arboricultural Report and Tree protection drawings prepared by Charles McCorkrell is included with the SHD application.
<b>(Objective GI9)</b> Require that burgage and townland field boundaries and ditches are utilised wherever possible as SUDS elements such as swales for conveying water; landscape features; and biodiversity-protecting elements.	Suds features are incorporated into the scheme where possible. Please refer to DBFL Infrastructure Design Report and associated detail.
<b>(Objective GI10)</b> Allow for limited sections of field boundaries (burgage and townland) to be carefully altered where a need has been clearly demonstrated on the basis of a requirement for accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces. Where this occurs, high quality design cues that signal and delineate the pre-existing plot line of the section of removed hedgerow boundary shall be utilised such as a change in materials with the use of high quality materials like cut stone and the use of lighting strips etc.	Some modest openings are proposed for access purposes, and which have been carefully sited so that they use areas where the hedgerow is weak so that other stronger areas of hedgerow are maintained.
<b>(Objective GI11)</b> Where removal of a section of hedgerow is required for street access, the street width and gap in the hedgerow shall be kept to a minimum and determined by street typology (see street design cross sections and typologies in Appendix 3) in order to protect and retain foraging routes for bats. Mature street planting should also be located to help fill the void between sections of hedgerow and create an 'eco hop' across each street as detailed in Section 7 of this Plan.	See response to GI10

### 8.2 Water and Water Management (including SUDS)

**Table 8.2: Consistency with relevant LAP policies for Water and Water Management (including SUDS)**

Policies/Objectives Water, SUDS	Consistency
<b>(Objective GI12)</b> To promote the sustainable collection and on-site retention of surface water for delayed discharge to the local water system and for use as an on-site resource and as a means of creating a biodiversity network that will retain and develop existing flora and fauna.	SUDs features are included in the design of the surface water run off, which is summarised in section 2 above, and in the DBFL IDR and drawings.
<b>(Objective GI13)</b> That a linked SUDS network shall be implemented fully across the Plan Lands in accordance with national and regional SUDS requirements including the Greater Dublin Strategic Drainage Study Initiative and all proposed developments shall contribute to the achievement of this integrated network in order to reduce surface water run-off and to minimise the risk of flooding of the Plan Lands and surrounding lands. This shall include for a series of attenuation wetland areas in parklands that will collect surface water from the developed SUDS network prior to it feeding the stream system to the north of the Village.	SUDs features are included in the design of the surface water run off, which is summarised in section 2 above, and in the DBFL IDR and drawings. The design is in accordance with the Greater Dublin Strategic Drainage Study.

<b>Policies/Objectives Water, SUDS</b>	<b>Consistency</b>
<b>(Objective GI14)</b> That all development shall incorporate on site SUDS technologies detailed in the Standards Section (Section 7) of this Local Area Plan such as porous grass paviors, green roofs, rainwater recycling systems and soakaways.	SUDs features are included in the design of the surface water run off, which is summarised in section 2 above, and in the DBFL IDR and drawings.
<b>(Objective GI15)</b> That existing natural swales, ditches and hedges shall be retained to form an integral part of the overall SUDS network.	The existing ditches are retained and form part of the SUDS network
<b>(Objective GI16)</b> That SUDS elements such as swales, detention and retention basins and other landscape based attenuation features be planted with suitable riparian vegetation and water tolerant tree planting that will clean and attenuate surface water flow. The planting of such species will be particularly required within parkland areas and along the east-west running SUDS elements in order to help intercept and direct waterflows.	Appropriate planting is provided as set out in the Murray Associates drawing details.
<b>(Objective GI17)</b> That all swales utilised within the SUDS network shall be of an appropriate (shallow and wide) dimension to allow for ease of maintenance including mowing and shall be designed in the interest of health and safety where practical.	New swales have been designed so as to ensure easy maintenance.
<b>(Objective GI18)</b> All planning applications for residential and/or commercial development in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is carried out at the site-specific level in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009). The scope of flood risk assessment shall depend on the type and scale of development and the sensitivity of the area.	A Site Specific Flood Risk Assessment, prepared by DBFL is included with the SHD application. The site is located within Flood Risk Zone C, appropriate for development.
<b>(Objective GI19)</b> Development proposals in the vicinity of the extreme to high aquifer vulnerability areas shall be accompanied by sufficient details to protect existing groundwater sources from pollution during construction and development phases. The details shall accord with the requirements of the South Dublin Groundwater Protection Scheme (2011).	The EIAR submitted with the SHD application includes details on the potential impacts and mitigation in relation to groundwater.

### 8.3 Protection and Incorporation of Built Heritage and Natural Heritage

**Table 8.3: Consistency with relevant LAP policies for Built Heritage and Natural Heritage**

<b>Policies/Objectives Built and Natural Heritage</b>	<b>Consistency</b>
Protected Structures and upstanding archaeological remains including their environs shall be protected, preserved and enhanced as part of any surrounding or adjoining development and incorporated into a heritage trail/network for the Village and its hinterland. (Objective GI20)	The EIAR includes a Cultural Heritage Archaeology Chapter prepared by IAC which was informed by Trench Testing and a Geophysical Report. Some minor previously undiscovered features were found and it is proposed to preserve by record.
An Archaeological Assessment Report shall be submitted with all planning applications within the Zone of Archaeological Potential. All such reports shall fully assess the archaeological implications of the proposed development. Where archaeological features are discovered it shall be demonstrated how the design and layout of the development protects, incorporates and enhances these features. (Objective GI21)	Some underground features AA1 (medieval and post medieval remains adjacent to tower house DU020-003007), AA2 (Kiln), AA3 (undated linear feature) and AA4 (burnt mound) were discovered as part of the excavations undertaken. The archaeological features and deposits within AA1-4 will be subject to archaeological preservation by record (prior to the commencement of construction). This will be carried out under licence to the National Monuments Service of the DoH/LGH. A justification is provided in the Material Contravention Statement.
Outside the Zone of Archaeological Potential, all developments shall be subject to archaeological monitoring for potential subsurface archaeological features. (Objective GI22)	The site was subject to a geophysical survey along with trench testing detail is provided in the IAC Archaeology Chapter.
Where significant archaeological features/deposits are discovered during archaeological investigations, it shall be a priority to allow for preservation in-situ especially features/deposits discovered during construction or investigation on lands to be occupied by planned open space(s). Features/deposits preserved in-situ should be accompanied by appropriate and sensitive explanatory signage. Where it is robustly demonstrated that it not possible to preserve features/deposits in-situ, full excavation and recording shall be a required alternative. (Objective GI23)	The EIAR includes a Cultural Heritage Archaeology Chapter prepared by IAC which was informed by Trench Testing and a Geophysical Report. Some minor previously undiscovered features were found and it is proposed to preserve by record. Preservation by record will be undertaken.
Development within the vicinity of an upstanding monument(s) shall enhance the setting of the feature(s) and shall be sited and designed appropriately. Views of the Motte and Saint Finian's Church of Ireland Church from Main Street and Hazelhatch Road shall be protected by sensitive surrounding development. Development of the derelict public house site (previously known as McEvoy's) at the north-east corner of the junction between Main Street and Hazelhatch Road should be especially designed to enhance and protect views of the Motte and Saint Finian's Church of Ireland Church. (Objective GI24)	Development within the Tower House (A protected structure, located outside the site) has provided additional open space and set backs to that provided in the LAP in addition to moving northwards the entrance on the Athgoe Road to the north to reduce the potential impacts on the Tower House.
In order to protect potential archaeological remains, basement developments including basement parking will generally be avoided within the Village and its environs, especially within the Zone of Archaeological Potential. (Objective GI25)	No basement parking is provided.
<b>Natural Heritage including Green Links</b>	
Ensure that all extensive development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity. (Objective GI27)	We refer the Board to the Biodiversity chapter of the EIAR by Altamar which includes mitigation measures to enhance biodiversity and reduce the impact on biodiversity and to minimise loss to local ecology.

Policies/Objectives Built and Natural Heritage	Consistency
To require the submission of a Bat Survey as part of every planning application for development (excluding house extensions) within the Plan Lands and require the implementation of appropriate mitigation measures that ensure for the protection of bats and their habitats. (Objective GI28)	A bat survey, prepared by Altamar, is included with the SHD application, which provides mitigation measures to reduce the potential impacts on bats.
To require the planting of mature native trees along both sides of streets located within the foraging and flight routes of bats in a manner that creates links between retained and augmented hedgerows and creates 'eco hop' opportunities across streets as detailed in Section 7 of this Plan. (Objective GI29)	Where possible, the planting scheme provides for planting augmentation of retained hedgerows.
To encourage the planting of native species to reinforce the natural habitats of bats within Newcastle and its environs. (Objective GI30)	The use of native species is provided for in the planting scheme by Murray Associates.
To create an open ended and integrated network of walking and cycle routes that promotes universal access for all and permeate the Plan Lands in a manner that coincides with biodiversity corridors and SUDS features. These routes shall form heritage trails that use natural and built heritage features to link a necklace of parks, open spaces and landscaped squares. (Objective GI31)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way). The north south green link is parallel to the Burgage Hedgerow plot which will form a biodiversity corridor.
To ensure that the transition between built development and the open countryside is sensitively treated, large open spaces and low density housing set amongst heavily landscaped streets shall be provided along the undeveloped fringes of the Plan Lands. This will require the augmentation of existing hedgerows with planting of streets and spaces with mature and semi-mature native tree species prior to the occupation of dwellings. (Objective GI32)	The density of the development reduces as it moves towards the south western boundary to comprise 2 storey dwellings. The higher density elements are located more centrally within the LAP lands.

#### 8.4 Accessibility and Movement Strategy

**Table 8.4: Consistency with relevant LAP policies for Accessibility and Movement Strategy**

Policies/Objectives Accessibility and Movement	Consistency
All relevant development proposals especially street proposals shall implement and adhere to the street hierarchy detailed in Table 5.3 and shall largely comply with the street designs detailed in Appendix 3. (Objective AM1)	The proposed development provides a street hierarchy in compliance with DMURs 2019. The design does not comply with the street designs contained in Appendix 3. The material contravention statement provides a justification.
Development proposals shall offer choices of routes and help to dissipate vehicular traffic throughout the Plan Lands. This will include a design speed of 30 kilometres per hour for Access Streets. (Objective AM2)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way).
All Neighbourhoods shall be afforded direct vehicular, pedestrian and cyclist access to Main Street. Access routes and streets shall be safe, barrier free and overlooked by development. (Objective AM3)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way).
Cycling and walking shall be encouraged within and through the Plan Lands by creating an open ended and integrated network of safe and accessible pedestrian and cycle routes that serve all streets and spaces including existing streets. All existing and new Neighbourhoods shall be afforded direct pedestrian and cyclist access to Main Street and direct or indirect links to each other and community facilities especially schools. (Objective AM4)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way).
Pedestrian and cycle routes shall be provided in accordance with the street typologies and cross sections illustrated in Appendix 3 to include for the provision of cycle and pedestrian paths/tracks on both sides of most street types. Access Streets shall be designed for speeds conducive to shared pedestrian, cycle and vehicular movements. (Objective AM5)	The proposed development provides a street hierarchy in compliance with DMURs 2019. The design does not comply with the street designs contained in Appendix 3. The material contravention statement provides a justification.
Signalised junctions shall be provided as opposed to roundabouts in order to encourage cyclist and pedestrian safety and movement. Roundabout junctions are prohibited. (Objective AM6)	The entrance to the development provides a signalised junction – no roundabouts are proposed.
Planning applications for residential, commercial and employment development are required to provide for or integrate with direct, safe and attractive pedestrian and cyclist routes to public transport stops especially bus stops along Main Street. (Objective AM7)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way).
To offer choices of routes and help to dissipate vehicular traffic throughout the Plan Lands by providing for multiple vehicular routes and connections to Main Street and Link Streets. This will include a design speed of 30 - 40 kilometres per hour for Link Streets and 30 kilometres per hour for Access Streets. (Objective AM8)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way).
To design streets for slow vehicular speeds from the outset in a manner that would limit the need to install retro-fitted traffic calming structures such as speed humps. Slower vehicular speeds shall be achieved through street design such as narrow carriageways, street enclosures and horizontal and vertical elements such as (inter alia) low traffic tables at junctions and/or pinch points. (Objective AM9)	The street layout has been designed in accordance with the principles of DMURs which includes a design led approach to reduce vehicular speeds. This is set out in detail in the DMURs compliance document prepared by DBFL, submitted with the planning application. .
That traffic calming mechanisms and contemporary solutions detailed in Section 7 and Appendix 3 of this Local Area Plan will be carefully incorporated within development proposals at the design stage. (Objective AM10)	The street layout has been designed in accordance with the principles of DMURs which includes a design led approach to reduce vehicular speeds. This is set out in detail in the DMURs compliance document prepared by DBFL, submitted with the planning application. The design does not comply with the street designs contained in Appendix 3. The material contravention statement provides a justification.

Policies/Objectives Accessibility and Movement	Consistency
To ensure that development within the Plan Lands is based on a grid layout, new developments will be highly connected and in a format that avails of every possibility of linking into the existing street network and will provide efficient connections to existing local facilities. The connected layout should align to desire lines and link the site to specific destinations especially Main Street. (Obj. AM11)	The proposed layout will integrate with the Graydon pedestrian and cycle routes to the east along with completing the east west connection to the south of the Main Street, along with providing a link to the northern boundary (St. Finian's way). Future permeability can be facilitated where the roads will be built to the boundary to the north east and also to lands to the south.
Assess all interfaces between proposed new developments, existing housing development and undeveloped lands at planning application stage and to ensure that all proposed development integrates and addresses existing development and undeveloped land especially residential development and open spaces in a manner that creates the opportunity for more permeable layouts and encourages passive and active surveillance of streets and spaces. (Objective AM12)	See response to objective AM11 above.
Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian access to community facilities, schools, open spaces, shopping facilities, local employment and public transport stops. (Objective AM13)	See response to objective AM11 above.

## 8.5 Land Use and Density Strategy

**Table 8.5: Consistency with relevant LAP policies for Land Use and Density Strategy**

Policies/Objectives Land Use	Consistency
To concentrate new commercial and community development including retail floorspace around historic/cultural, civic and retail nodes along Main Street in a manner that contributes to Main Street's vitality and viability and its re-establishment as the Village Core. (Objective LUD1)	It is noted there is a supermarket (and community space) currently under construction located at the entrance to Graydon to the east on the Main Street.
That the preferred location for retail and service development along Main Street is around retail nodes situated close to existing businesses. Such development shall be commensurate to the local needs of Newcastle Village and shall comprise a medium sized supermarket (up to 1,500 sq.m net) and small scale flexible use commercial and retail units. (Objective LUD2)	It is noted there is a supermarket (and community space) currently under construction located at the entrance to Graydon to the east on the Main Street.
Development within the Village Expansion area shall be sensitively consolidated within the burgage plot field system in a manner that retains field boundaries and enhances and protects biodiversity. Where burgage boundaries have been removed previously, these shall be reinstated as part of any new development. (Objective LUD7)	The proposed apartment buildings are located within the expansion area and sit within the Burgage Plot field system. The inclusion of apartments protects the long term viability of the Burgage Plot as the boundaries will remain in the public domain. This is in contrast to the LAP which envisaged houses in the area which would result in a long term maintenance issue for the hedgerows.
Residential development within the Settlement Edge shall consist of low density detached and semi-detached residential housing (15 – 20 dwellings per Hectare) on large garden plots. Such housing shall provide an appropriate and soft transition with the adjoining open countryside and shall be set amongst generously planted streets and open spaces that includes for semi-mature planting. (Objective LUD8)	The proposed development provides densities in accordance with the SRD Guidelines 2009, 33.1 units per hectare Gross (37.1 net) which are higher than the 15-20 uph. A justification is provided in the Material Contravention Statement, prepared by John Spain Associates, submitted with the application.
Development of the Main Street and the Ballynakelly West Neighbourhoods (see Section 6) shall each include for the provision of a primary school site (two in total) that accord with the requirements of this Local Area Plan. The Expansion School Site shall adjoin St. Finian's National School with available access from Main Street and the New School Site shall be located adjacent to the planned Countryside Village Park and the Ballynakelly Development with available access from the Ballynakelly Development. (Objective LUD9)	The development by Cairn (Graydon) has reserved a site for a Primary School. The east west connection that will be completed by this SHD will provide enhanced access across the southern part of the LAP to the existing St. Finian's School and the future Primary School site.
The New School Site shall share recreational facilities with the adjacent planned Countryside Village Park (Taobh Chnoic Park). (Objective LUD11)	The development by Cairn (Graydon) has reserved a site for a Primary School. Substantial recreational facilities will be delivered on the Taobh Chnoic Park, including playing pitch, MUGA, play equipment and allotments.
Community facilities, which shall include youth specific facilities, shall be provided at a rate of 3 sq.m per 10 dwellings. The provision of community floorspace at, or adjoining, the existing St. Finian's Community Centre and/or the payment of development contributions towards the provision of community floorspace at this location will be sought as an alternative to the piecemeal location of small pockets of floorspace on individual sites. (Objective LUD12)	The applicant is happy for a special contribution in relation to the provision of community facilities as per the South Dublin Contribution Scheme.
Restrict apartments/duplexes only to small gateway and landmark sites and to developments that include an element of retail or service (financial, professional or other) floorspace within the Village Core and the site of the Ballynakelly Local Centre. Such developments shall be of a small scale and shall fulfil a clear aesthetic or wayfinding function. The mix of dwelling types on sites that are subject to extant permissions should be amended accordingly where possible. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this restriction on apartments and duplexes. (Objective LUD14)	The proposed development includes apartments and duplex apartments in accordance with the Building Height Guidelines 2018. A justification is provided in the Material Contravention Statement, prepared by John Spain Associates, included with the application.
Ensure that at least 90% of dwellings in any residential scheme have two or more bedrooms with the exception of independent housing schemes for older people. (Objective LUD16)	80.8% of the dwellings in the development have 2 or more bedrooms. A justification is provided in the Material Contravention Statement, prepared by John Spain Associates, included with the application.
To encourage a mix of dwelling types and quality designs that will help aid legibility and way-finding throughout the area. (Objective LUD 17)	The proposed development includes a range of dwelling types including house, duplex apartments and apartments, providing a mix of units within each typology.

## 8.6 Built Form

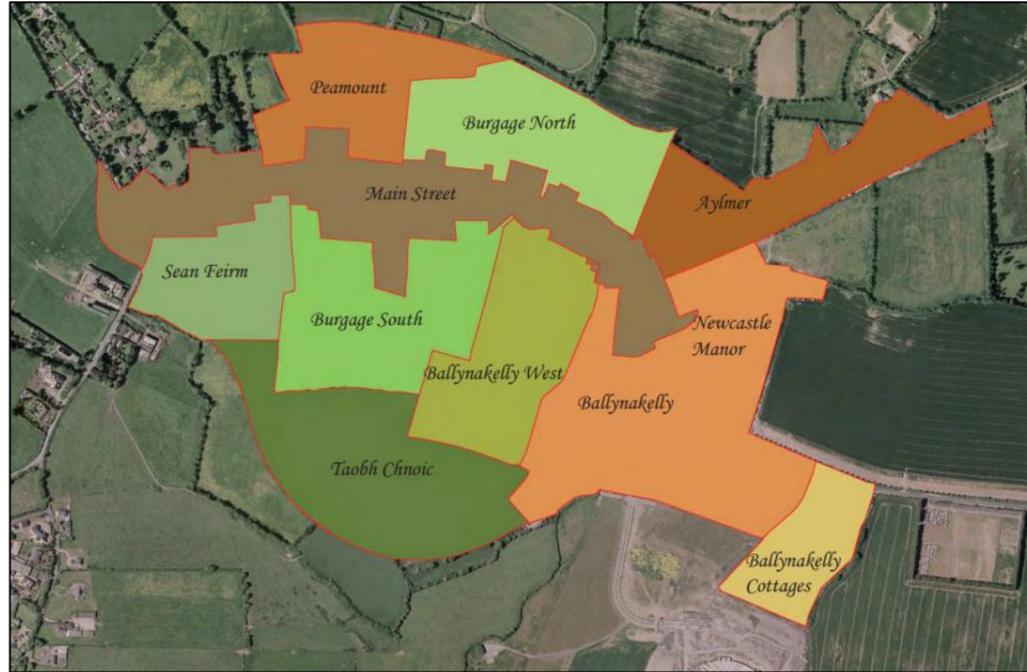
**Table 8.6 – Consistency with relevant LAP policies for Built Form**

Policies/Objectives Built Form	
Development shall present key building frontages to the street edge within the Village Core and Village Expansion areas in accordance with the requirements of this Local Area Plan. Landscape Frontages shall be presented to the street edge in the Settlement Edge. Active frontages should be promoted as much as possible especially along Main Street. (Objective BF1)	The proposed development provides active frontages within the design. However in order to preserve the Burgage Plot the proposed development includes apartments which sit within the hedgerows rather than presenting a building frontage within the village expansion area.
All streets are designed in accordance with the Street Hierarchy set out in the Accessibility and Movement Strategy of this Plan and the relevant design and cross section details set out in Appendix 3 of this Plan. (Objective BF2)	The proposed development provides a street hierarchy in compliance with DMURs 2019. The design does not comply with the street designs contained in Appendix 3. The material contravention statement provides a justification.
The materials, texture and colour of proposed carriageways shall be appropriate to their location within Newcastle. The width of vehicular carriageways shall be minimised to the requirements of the appropriate design speed, user needs and context and function of the street. (Objective BF3)	The proposed development provides a street hierarchy in compliance with DMURs 2019. The main access routes (e.g. leading to/from the site access nodes with Link streets) of internal street network of Local streets will be formed using standard macadam / asphalt finishes, however for Homezone streets, a colour contrast is to be achieved by way of a buff macadam finish in order to lower design speed in these areas
Pedestrian facilities such as wide footpaths and well designed crossings will form part of all planning applications for development within the Plan Lands. (Objective BF4)	Footpaths of generally 2.0m width and are provided throughout the scheme with connections / tie-in to existing external pedestrian networks. Well designed and frequently provided pedestrian crossing facilities are provided along key travel desire lines throughout the scheme in addition to those located at street nodes. All courtesy crossings are provided with dropped kerbs or a raised flat top treatment thereby allowing pedestrians to informally assert a degree of priority.
Streets will be designed to reflect the historic character and importance of Newcastle and to contribute to its setting and visual amenity (Objective BF6)	The proposed development provides a street hierarchy in compliance with DMURs 2019.
Require the submission of a design statement and rationale for all housing and/or commercial development that demonstrates how the development incorporates elements that reflects its time and place. This should include for the use of local building materials and respond to this Plan's requirements with relation to urban structure, urban grain, density and land-use, buildings heights, green infrastructure and the historic setting of recorded monuments and protected structures. (Objective BF7)	We refer the Board to the MOLA Architectural Design Report included with the application.
Require the incorporation of a variety of dwelling designs throughout the Plan Lands and particularly within individual developments, subject to the use of a limited palette of materials .(Objective BF7a)	A variety of dwellings is proposed comprising houses (15 no. house types), duplex apartments, (4 no. types) & apartments 3 no. types.
Require all new buildings to be high in energy efficiency and to use energy sources that minimise damage to the environment. All new buildings shall comply with Section 5.4 (Sustainability and Energy Efficiency) of Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007) and the relevant Building Regulations. (Objective BF7b)	High levels of energy conservation are proposed as well as renewable energy (Solar Panels) which is outlined in the Energy Statement prepared by Waterman Moylan and included in the application.
New development shall be a maximum of two storeys in height with limited exceptions for buildings on landmark sites designated within the Village Core and Expansion Area where there is scope for landmark buildings to include elements that reach a maximum height of between 9 and 12 metres depending on location. (Objective BF8)	The proposed development provides a range of heights comprising houses (2 storeys) duplex buildings (3 no. 3 storey buildings) and 2 no. 5 storey apartment buildings, (above 12m) located in the expansion area. A Justification is provided in the Material Contravention Statement prepared by John Spain Associates, included with the application.
To promote innovative building design that demonstrates a high level of energy conservation, energy efficiency and use of renewable energy sources in accordance with national regulations and policy guidelines. (Objective BF8a)	Response as per Objective BF7b above,
To prohibit basement developments in the interests of protecting Newcastle's archaeological heritage. (Objective BF9)	No basement car parking is proposed in the apartment buildings.
Gateway and landmark features/structures shall only be developed at the identified locations and shall be appropriate to the scale and character of surrounding development. (Objective BF10)	The proposal includes 2 no. 5 storey buildings located in the expansion area, which sits comfortably within the Burgage plot field system. The LAP identifies locations for gateway/landmark features. A justification is provided in the Material Contravention Statement prepared by JSA.
Gateway and landmark features/structures shall incorporate elements, finishes and materials that reflect the development's time and place. The use of trees and planting as gateway features are encouraged especially at the western gateways of the village. (Objective BF11)	The proposal includes 2 no. 5 storey buildings located in the expansion area, which are contemporary in design/finish. The buildings sit comfortably within the Burgage plot field system. The proposed Tower Park at the western gateway includes planting and is an additional area of open space compared to the LAP Tower Park which is located outside the site (on Third Party lands).

**8.7 Location**

8.2 The subject lands are located as part of three distinct neighbourhood divisions of the Newcastle Local Area Plan lands. These are Sean Feirm, Burgage South, Taobh Chnoic.

**Figure 8.1: Map of Newcastle Local Area Plan 2012 (as extended) showing the division of plan lands into neighbourhoods**



8.3 With regard to such neighbourhoods, it is an objective of the Local Area Plan to;

**Objective N1:** Require planning applications for any building(s), street(s) or space(s) to be accompanied by a masterplan layout drawing that details how the proposed building(s), streets(s) or space(s) fits within the framework for the neighbourhood to which they relate in terms of accessibility and movement; integration of development; density and land use; green infrastructure and built form. These framework elements can be varied in terms of precise location and design provided that they conform to the principles and guidance set out in this Local Area Plan. Existing utilities should be accommodated between blocks and under streets.

**Objective N2:** Ensure that each neighbourhood is developed with open ended and integrated pedestrian and cycle routes that link with Main Street and adjacent neighbourhoods.”

**Figure 8.2: Overall Development Summary of Neighbourhoods, Newcastle LAP 2012 (as extended)**

	Sean Feirm	Burgage South	Taobh Chnoic
Gross Area (Ha.)	5.4	9.7	12
Parks, Major Streets, Existing development (Ha.)	0.8	1.19	6.5
Net Area excl. 10% for infrastructure (Ha.)	4.1	7.7	5
Estimated Dwellings <sup>1</sup>	70	210	90
Average Net Density (dwellings per hectare)	15-20	25-30	15-20
Estimated Population <sup>4</sup>	198	594	255

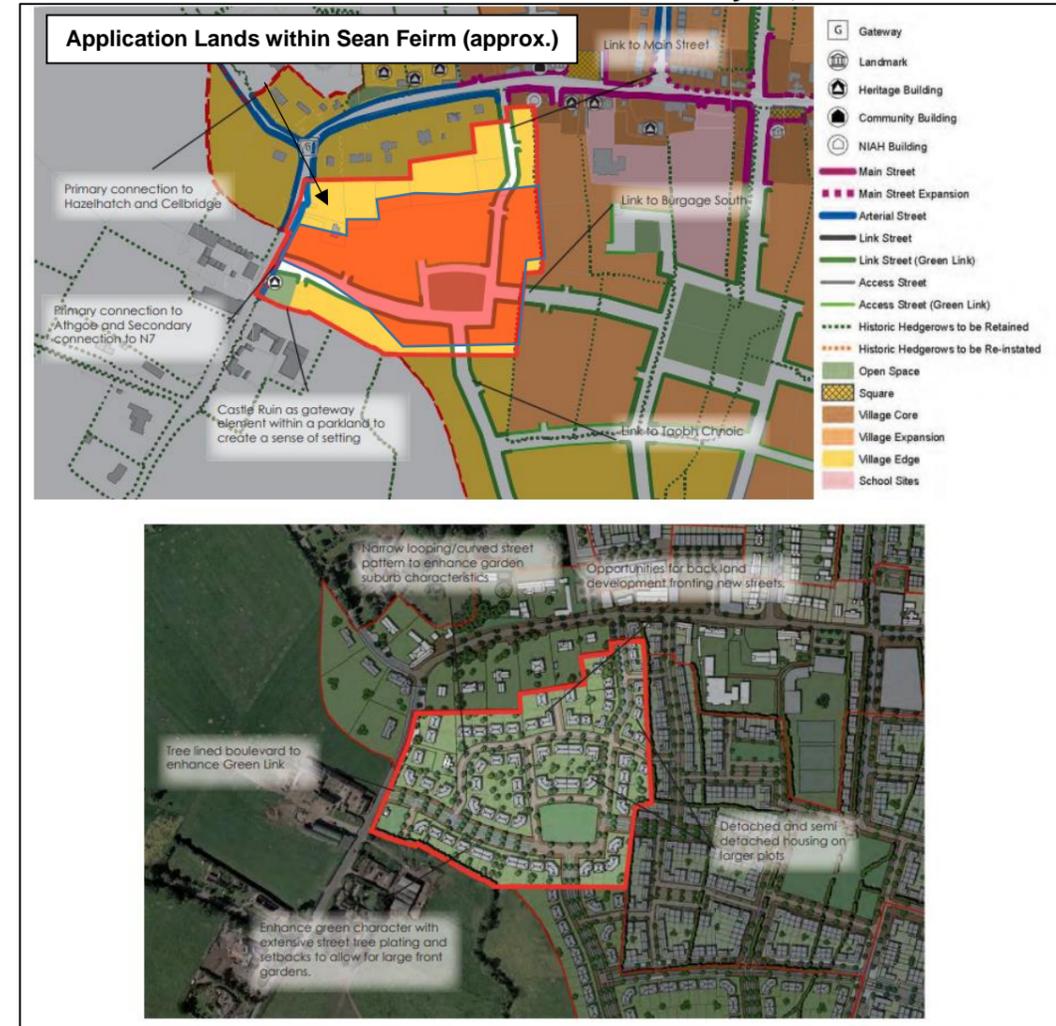
8.4 The following table lists the key policies and objectives of the LAP which relate to the Sean Feirm neighbourhood, and how the proposal is consistent with such also:

**Table 8.7: Consistency with relevant LAP policies for Sean Feirm**

Policies/Objectives Sean Feirm	Consistency
<b>Objective SF1:</b> Largely comprise detached and semi-detached dwellings on large garden plots that are set back from the street edges by front gardens.	Within Sean Feirm, the proposed development proposes a mix of semi-detached dwellings with good frontage along the link street. The proposal includes Sean Feirm Park centrally within the scheme along with a pocket park to the north of tower house (which is under separate ownership to the south). An additional park is provided in the eastern part of the site. Suds are incorporated into the design.
<b>Objective SF2:</b> Provide for two parks including a soft landscaped pocket park located around the upstanding tower house with passive recreation facilities and a local park with passive and active recreation facilities that forms part of the SUDS network through the incorporation of a water feature.	The proposal includes a tree lined boulevard link street.
<b>Objective SF3:</b> Include for a tree lined boulevard (Green Link Street) that links both of the neighbourhood’s parks with Athgoe Road and forms part of the SUDS network through the incorporation of a central swale.	With reference to Objective SF4, DBFL have investigated this feature and note that it relates to a depression in the ground.
<b>Objective SF4:</b> Ensure that any proposals on lands adjoining the larger retention pond identified at the western end of the Newcastle South Townland as depicted on the Newcastle Parish Ordnance Survey Map, 1865, shall seek to incorporate this feature and be accompanied by reports from suitably qualified persons on both the surface water management and historic significance of this feature.	
<b>Objective SF5:</b> Development of the Sean Feirm Neighbourhood shall include for a vehicular and pedestrian connection to Main Street and a vehicular and pedestrian connection to Athgoe Road that forms part of an	The proposal includes a vehicular and pedestrian link to the northern boundary, which will integrate with the permission to then north (currently under construction under SD18A/0363 which will provide link to the Main Street.

Policies/Objectives Sean Feirm	Consistency
<p>east-west through route between Athgoe Road and Ballynakelly.</p> <p><b>Objective SF6:</b> Development of the Sean Feirm Neighbourhood shall include for access/tertiary streets that are finished with shared surfaces for pedestrians, cyclist and vehicles.</p>	<p>The proposal includes an east west connection from Athgoe Road and Ballynakelly to the east via the 'Graydon' development (SHD under construction by Cairn) to the east.</p> <p>The proposed development includes a clear hierarchy of streets as set out in the DMURs compliance document prepared by DBFL.</p>
<p><b>Objective SF7:</b> Development within the Sean Feirm Neighbourhood shall provide for residential uses only at a maximum density of circa 20 dwellings per hectare.</p>	<p>The proposed development provides densities in accordance with the SRD Guidelines 2009, 33.1 units per hectare Gross (37.1 net). Within the Sean Feirm Neighbourhood the density proposed is c. 21.2 which are higher than the 20 dwellings per hectare outlined for the Sean Feirm Neighbourhood.</p>
<p><b>Objective SF8:</b> In order to provide an appropriate transition with the rural hinterland and ensure for the provision of low density housing as an alternative to rural housing, development of the Sean Feirm Neighbourhood shall only comprise detached and semi-detached houses.</p>	<p>The proposed development provides a series of 2 storey semi-detached dwellings within the Sean Feirm neighbourhood, which is at a lower density compared to the apartments to the east (within the village core)</p>

Figure 8.3: Sean Feirm – Local Framework and Indicative Layout, Newcastle



8.5 The following table lists the key policies and objectives of the LAP which relate to the Burgage South neighbourhood, and how the proposal is consistent with such also:

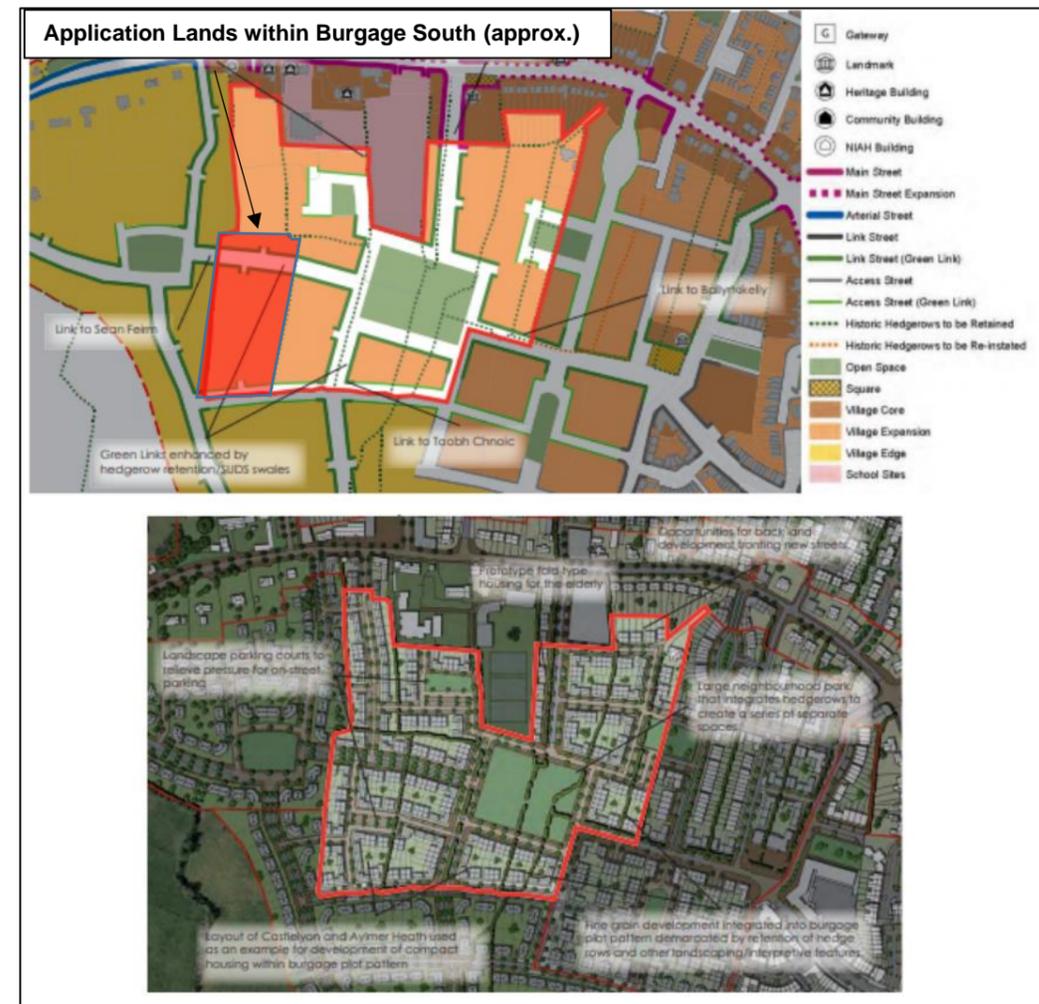
Table 8.8: Consistency with relevant LAP policies for Burgage South

Policies/Objectives Burgage South	Consistency
<p><b>Objective BS1:</b> All planning applications for development within the Burgage South Neighbourhood shall clearly identify how burgage plot hedgerows and ditches to these boundaries will be enhanced and incorporated in a similar, but improved, model to the Castlelyon development, Aylmer Heath development and the development permitted under SD07A/0246. All such applications shall include a comprehensive hedgerow survey and method statement (compiled by a suitably qualified person) for protection, incorporation and reinstatement of the historic boundaries before, during and after construction. This shall include for details on protecting any sections of</p>	<p>The proposed development maintains the existing Burgage plot where it is proposed to provide 2 no. apartment blocks.</p> <p>It is considered this design solution will allow for the hedgerows to remain in the public domain and be maintained, thus ensuring their preservation and enhancement.</p> <p>An Arboricultural Report and Tree protection drawings prepared by Charles McCorkrell is included with the SHD application.</p>

Policies/Objectives Burgage South	Consistency
hedgerow outside the application site that directly adjoin the application site.	
<b>Objective BS2:</b> Burgage boundaries be utilised wherever necessary as SUDS elements in the form of swales for conveying water, landscape features and biodiversity-protecting elements. This shall include for the use of the burgage boundaries for the division of the planned neighbourhood park into a series of linked gardens with varying functions and SUDS features.	Suds features are incorporated into the scheme where possible. Please refer to DBFL Infrastructure Design Report and associated detail.
<b>Objective BS3:</b> The sensitive opening of limited sections of burgage boundaries is permissible where a need has been clearly demonstrated on the basis of a requirement for accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces. Where this occurs, high quality design cues that signal and delineate the pre-existing plot line of the section of removed hedgerow boundary shall be utilised such as a change in materials with the use of high quality materials like cut stone and the use of lighting strips etc.	Some modest openings are proposed for access purposes, and which have been carefully sited so that they use areas where the hedgerow is weak so that other stronger areas of hedgerow are maintained.
<b>Objective BS4:</b> Development of the Burgage South Neighbourhood shall include for a series of parks that incorporates existing burgage plot hedgerows and SUDS features. Each of these spaces shall fulfil a clear function. The larger neighbourhood park shall be divided by the hedgerows in a manner that creates a series of linked open spaces of varying character and active and passive functions including walking, cycling, children's play, and informal sporting activities.	<p>The proposal relates to a minor western part of the overall Burgage South Neighbourhood.</p> <p>The proposal provides an apartment element which will sit comfortably within the existing burgage plot.</p> <p>The school to the east has had an impact on the overall layout within the Burgage South Neighbourhood, outside the control of this application.</p> <p>Within the subject lands public and communal open space areas are provided which have a clear function and which will be overlooked appropriately by the apartments.</p>
<b>Objective BS5:</b> Development within the Burgage South Neighbourhood shall ensure that the neighbourhood acts as a hub for movement and provides for and contributes to the creation of an open ended east west and north-south aligned streets between the surrounding neighbourhoods of Taobh Chnoic, Sean Feirm, Ballynakelly West and Main Street.	The proposed development includes a street along the northern part of the subject site which can link to the lands to the east.
<b>Objective BS7:</b> Development within the Burgage South Neighbourhood shall provide for residential uses including housing for older people at a maximum density of circa 30 dwellings per hectare. Local shop and/or service units of not more than 100 sq.m (net) each are permissible at street corners, junctions and adjacent to parklands.	The proposed development provides densities in accordance with the SRD Guidelines 2009, for a centrally located site in a small town (40+ units per hectare) which are higher than the 30 dwellings per hectare outlined in the LAP. This is addressed in the Statement of Material Contravention.

Policies/Objectives Burgage South	Consistency
<b>Objective BS8:</b> Development of the Burgage South Neighbourhood shall largely comprise terraced houses with opportunities for detached and semi-detached housing and dwellings specifically designed for the needs of older people.	See Objective BS7:

Figure 8.4: Burgage South – Local Framework and Indicative Layout, Newcastle LAP 2012 (as extended)



8.6 The following table lists the key policies and objectives of the LAP which relate to the Taobh Chnoic neighbourhood, and how the proposal is consistent with such also:

**Table 8.9: Consistency with relevant LAP policies for Taobh Chnoic**

Policies/Objectives Taobh Chnoic	Consistency
<b>Objective TC1:</b> Largely comprise (of) detached and semi-detached dwellings on large garden plots that are set back from street edges by front gardens.	The proposed development provides a range of dwelling types (duplex apartments and dwellings) to provide sustainable densities on serviced land. This is addressed in the Statement of Material Contravention.
<b>Objective TC2:</b> Provide for a large countryside park along the southern fringe of the Plan Lands that will act as the main primary open space for active recreation for Newcastle Village; a point of convergence for pedestrian and cycle paths that permeate the Plan Lands; and a landscaped buffer to the open countryside with the inclusion of Children's Play Facilities, MUGAs including all-weather playing pitches, pedestrian and cycle routes, existing hedgerows, heritage trails and woodland planting.	The SHD 'Graydon' Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces and plan areas and experiences. Young Children's Area Play (YCAP) have been incorporated into the smaller local open spaces at Ballynakelly West Park and Ballynakelly West Square. Neighbourhood & Local Equipped Play Areas (NEAP & LEAP combined) have been incorporated into the initial phase of Taobh Chnoic Park. A further, fully equipped playground is being provided at Ballynakelly Park in consultation with South Dublin County Council.  There are further lands identified in the southern part of the LAP lands which are legally contested and at this time not possible for Cairn to include further landscaping proposals. Nevertheless, the wider area is well served by high-quality open space, which will be augmented by the proposed 1.71 hectares of open space as part of Newcastle south.
<b>Objective TC3:</b> Include for tree lined boulevards (Green Links) that incorporate SUDS elements, in the form of swales, and links the Countryside Park (Taobh Chnoic Park) with adjacent neighbourhoods and pedestrian and cycle routes.	The east west link street (Boulevard) includes tree planting and the wider site include Suds features where possible. Cycle routes are also provided as well as a north south green link.
<b>Objective TC5:</b> Include for vehicular, pedestrian and cycle connections with all adjoining neighbourhoods, which shall converge on the Countryside Village Park (Taobh Chnoic Park) and form circuit routes. These routes shall connect the Countryside Park with Tower House Park and Sean Feirm Park.	The proposal provides for connections east, west and to the norther boundary all to integrate with the under-construction developments.
<b>Objective TC6:</b> Include for tertiary streets (Green Access Streets) that are finished with shared surfaces for pedestrians, cyclist and vehicles around the developed perimeters of the Countryside Village Park (Taobh Chnoic Park) and the designated school site.	The proposed development provides a north south green link within the scheme connecting Sean Feirm Park to the south and east and ultimately to the designated school site.
<b>Land-use and Density</b>	
<b>Objective TC7:</b> Residential development within the Taobh Chnoic Neighbourhood shall be carried out at a maximum density of circa 20 dwellings per hectare.	The proposed development provides densities in accordance with the SRD Guidelines 2009, (29.4 units per hectare) which are higher than the 20 dwellings per hectare outlined for the Sean Feirm Neighbourhood. This is addressed in the Statement of Material Contravention.

Policies/Objectives Taobh Chnoic	Consistency
<b>Objective TC8:</b> A primary school site with playing fields, staff parking and pick up/ drop off facilities shall be reserved close to the recently established population base at Ballynakelly and adjacent to the Countryside Village Park (Taobh Chnoic Park).	A primary school site has been reserved to the east as part of the permitted SHD Cairn 'Graydon' development.
<b>Objective TC9:</b> In order to provide an appropriate transition with the rural hinterland including the Countryside Village Park (Taobh Chnoic Park) and to ensure for the provision of low density housing as an alternative to rural housing, development of the Taobh Chnoic Neighbourhood shall only comprise detached and semi-detached houses.	The proposed development provides a range of dwelling types (duplex apartments and dwellings) to provide sustainable densities on serviced land. This is addressed in the Statement of Material Contravention.

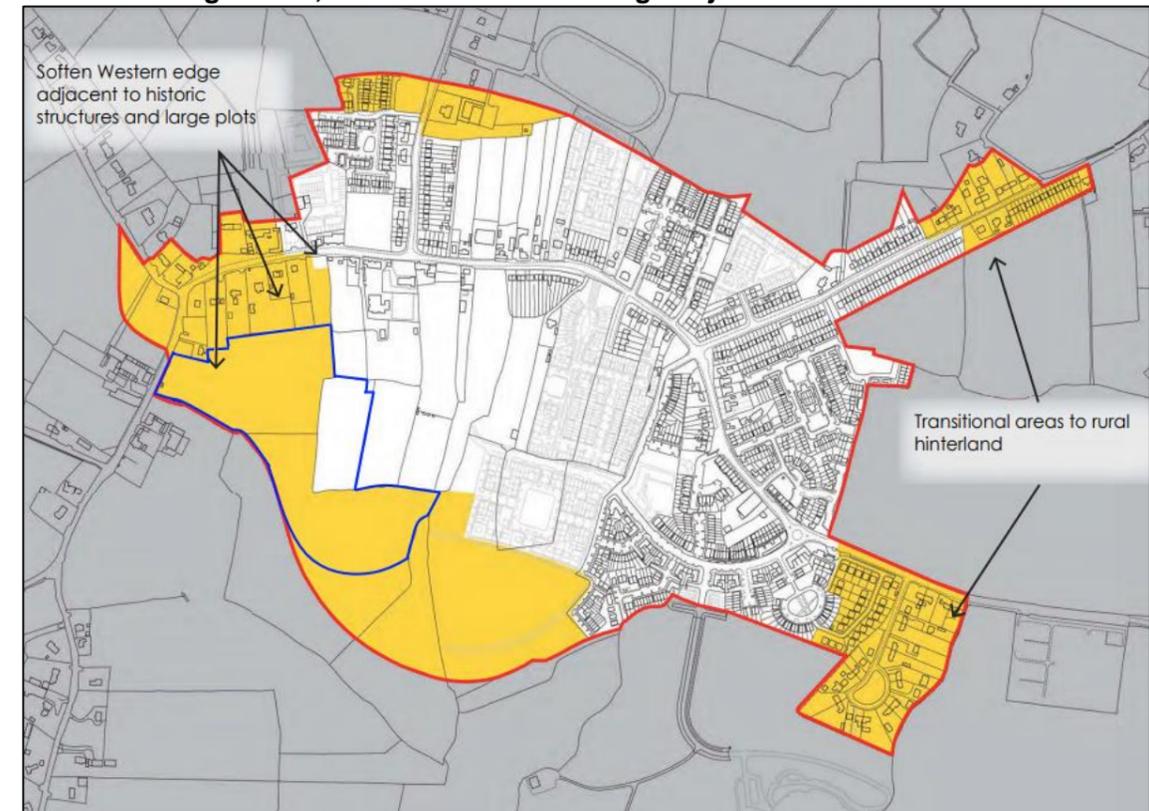
**Figure 8.5: Taobh Chnoic – Local Framework and Indicative Layout, Newcastle LAP 2012 (as extended)**



## 8.8 Residential Density

- 8.7 In terms of the Newcastle LAP's settlement and density strategy, the subject lands fall within the remit of a 'Settlement Edge' character area classification, so as to *"form... residential development that abuts the open countryside... that will provide an appropriate counterbalance to the concentration of development on the eastern side of the village by creating a softer transition to the rural hinterland to the southern, western and northern fringes of the Plan lands."*
- 8.8 It is an objective of the Local Area Plan that residential development within the 'Settlement Edge' shall consist of low density detached and semi-detached residential housing (15-20 dwellings per hectare) on large garden plots. This low density housing shall also provide an appropriate and soft transition with the adjoining open countryside and shall be set amongst generously planted streets and open spaces that includes for semi-mature planting, as specified.
- 8.9 The LAP (objective LUD18) states it is an objective of the LAP that:
- "The density of development across the Plan lands shall accord with that identified for each character area under table 5.3 of this Plan. The density of development on sites that are subject to extant permissions should be amended accordingly, where possible. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this Local Area Plan's density strategy or the densities recommended for small towns and villages under Sustainable Residential Development in Urban Areas (2009)"*
- 8.10 It is noted that the proposed development has a density of 33.1 units per hectare Gross (37.1 net) and thus contravenes such policy of the Newcastle Local Area Plan 2012 (as extended). However it is considered the proposed density is in accordance with the densities recommended for small towns under the Sustainable Residential Development in Urban Areas (2009). Nevertheless, a Statement of Material Contravention prepared by John Spain Associates is included with the pre-application submission to An Bord Pleanála.

**Figure 8.6: Map from Newcastle Local Area Plan 2012 (as extended) showing Softened Settlement Edge lands, incl. annotation showing subject site in blue**



## 8.9 Built Form Strategy - Height

- 8.11 With reference to height, objective BF8 of the LAP states that:
- "New development shall be a maximum of two storeys in height with limited exceptions for buildings on landmark sites designated within the village core and expansion area where there is scope for landmark buildings to include elements that reach a maximum height of between 9 and 12 metres depending on location"*
- 8.12 It is acknowledged that the proposed development contravenes BF8 of the Newcastle Local Area Plan 2012 (as extended).
- 8.13 The proposed density, unit mix and associated building height are supported by the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), as described in Section 5.11.
- 8.14 The Statement of Material Contravention prepared by John Spain Associates which accompanies this report and SHD application addresses this issue and, once again, demonstrates how An Bord Pleanála is justified to grant permission for the scheme.

## 8.10 LAP Policies and Objectives

- 8.15 The following table lists the other key policies and objectives of the LAP which relate to the development, and how the proposal is consistent with such also:

**Table 8.10 – LAP Development Standards**

Policies/Objectives	Consistency
<p><b>Development Standards</b></p> <p>The Standards and Design Criteria section of the LAP sets out qualitative and quantitative standards and urban design criteria for the development of the Plan lands, this includes;</p> <ul style="list-style-type: none"> <li>▪ Pedestrian and cyclist movement;</li> <li>▪ Cycle parking and facilities;</li> <li>▪ Pedestrian routes;</li> <li>▪ Lighting;</li> <li>▪ Car parking;</li> <li>▪ Traffic Calming;</li> <li>▪ Traffic Noise;</li> <li>▪ Dwelling standards;</li> <li>▪ Private amenity space for houses;</li> <li>▪ Private amenity space for apartments;</li> <li>▪ Privacy and overlooking;</li> <li>▪ Bin storage;</li> <li>▪ Block form, urban grain and street interface;</li> <li>▪ Accessibility;</li> <li>▪ Public open space quantum;</li> <li>▪ Neighbourhood Equipped Area for Plan (NEAP);</li> <li>▪ Local Equipped Area for Plan (LEAP);</li> <li>▪ Young Children’s Area of Play (YCAP);</li> <li>▪ Specifications for Street Finishes;</li> <li>▪ Boundary Treatments;</li> <li>▪ Landscaping and Incorporation of Existing Elements;</li> <li>▪ Soft Landscaping and New Planting;</li> <li>▪ Bat Movement across streets;</li> <li>▪ Hard Landscaping and Street/Park Furniture;</li> <li>▪ Management and Maintenance of Hard and Soft Landscaping;</li> <li>▪ Renewable Energy;</li> <li>▪ Surface Water Drainage;</li> <li>▪ Ponds and Basins;</li> <li>▪ Swales;</li> <li>▪ Porous Grass Paver Grids;</li> <li>▪ Soakaways;</li> <li>▪ Green Roofs;</li> <li>▪ Rainwater Harvesting; and</li> <li>▪ Place Names.</li> </ul> <p>It is noted that specific objectives for each of the standards headings are not given but rather a more general, over-arching objective is designated;</p> <p>Objective SC1: Development within the Plan Lands shall adhere to the qualitative</p>	<p>We refer the Board to the HQA and Design Report prepared by MOLA architects along with the Murray Associates Landscape Masterplan and Design report as well as the Energy Statement by Waterman Moylan. In addition, the DBFL reports provide detail on road design etc. We also refer the Board to the Alternar environmental report (including AA screening)</p>

Policies/Objectives	Consistency
and quantitative standards and urban design criteria set out under this Plan.	

**8.11 LAP Phasing**

8.16 The table below summarises the required phasing outcomes within Phases 1 to 4 and the current status of each outcome.

**Table 8.11: LAP Phasing**

Phase	Status
<b>Phase 1 (up to 300 - 540 dwellings)</b>	
The completion of the expansion or redevelopment of the existing school along Main Street and its opening for the intake of pupils, OR, the completion of a second primary school, on another site within the Plan lands, and its opening for the intake of pupils.	St. Finian’s National School has been completed and is operational on LAP lands to the east of the subject site. The under construction ‘Graydon’ development by Cairn provides for the reservation of a school site within the development which will be made available to the Department of Education as required.
The provision of at least 130 sq.m of community floorspace, preferably located along Main Street	The existing St. Finian’s Community Centre is a significant facility on a constrained site. There is limited scope to provide an additional 130sqm without full redeveloping the site. Furthermore, since the preparation of the LAP St. Finian’s National School has been opened and provides additional facilities and space available for use by the local community. Given the significant established facilities it is considered that an appropriate contribution, to be agreed with South Dublin County Council, toward the enhancement and running of the established facilities would be more appropriate and beneficial to existing and future communities in Newcastle. The Applicant is happy for a condition to this affect to be attached to any permission
<b>Phase 2 (100 dwellings)</b>	
1.71 Ha. open space (to include a minimum of 1 NEAP, 1 LEAP and 2 YCAPs)	The SHD ‘Graydon’ Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces and plan areas and experiences. Young Children’s Area Play (YCAP) have been incorporated into the smaller local open spaces at Ballynakelly West Park and Ballynakelly West Square. Neighbourhood & Local Equipped Play Areas (NEAP & LEAP combined) have been incorporated into the initial phase of Taobh Chnoic Park. A further, fully equipped playground is being provided at Ballynakelly Park in consultation with South Dublin County Council
A minimum of two Neighbourhood Link Streets, which will open up two new access points with Main Street (or the arterial street network)	Links have been provided as part of ‘Graydon’ development (SHD by Cairn) as well as the under construction development of 18 units located along the northern boundary of Newcastle South. all Link Streets identified in

Phase	Status
	Figure 5.6 to the south of Main Street and to serve the eastern portion of the LAP lands will be delivered.
50 sq.m of community floorspace as part of one facility at, or adjoining, the existing Saint Finian's Community Centre and/or the payment of development contributions towards the provision of community floorspace at this location.	Can be addressed as part of an appropriate condition as part of planning permissions.
<b>Phase 3 (100 dwellings)</b>	
1.1 Ha. of open space (to include a minimum of 1 LEAP and 2 YCAPs)	The 'Graydon' development by Cairn (under construction to the east) provides for the delivery of the initial phase of the village park which will provide a range of passive and active recreational spaces.
A minimum of two Neighbourhood Link Streets, which will open up two new access points with Main Street (or the arterial street network). At least one of these Neighbourhood Link Streets will link Taobh Chnoic Park with Main Street to the north.	Links have been provided as part of 'Graydon', the SHD under construction by Cairn as well as the under-construction development of 18 units located along the northern boundary of this SHD application site.
Negotiations completed and planning permission in place for the construction of a second primary school.	School site reserved to the east as part of Cairn Graydon Development.
50 sq.m of community floorspace as part of one facility at, or adjoining, the existing Saint Finian's Community Centre and/or the payment of development contributions towards the provision of community floorspace at this location.	Can be addressed as part of an appropriate condition as part of planning permissions.
<b>Phase 4 (100 dwellings)</b>	
1.1 Ha. of open space (to include a minimum of 1 LEAP and 1 YCAPs)	The SHD 'Graydon' Development by Cairn provides for the delivery of 3.8ha of open space providing a range of spaces and plan areas and experiences. In addition to the 'Graydon' SHD by Cairn the proposal includes Sean Feirm Park, a green link and a series of open spaces.
A minimum of two Neighbourhood Link Streets, which will open up two new access points with Main Street (or the arterial street network).	Links have been provided as part of 'Graydon' SHD by Cairn as well as the under construction development of 18 units located along the northern boundary of this SHD application site.
Full east-west linkage across Plan Lands between the neighbourhoods of Ballynakelly and Sean Feirm.	The proposal will provide east-west linkage across the Plan lands between the neighbourhoods of Ballynakelly and Sean Feirm.
Full north-south linkage across Plan Lands between neighbourhoods of Peamount and Taobh Chnoic.	The under-construction development to the north of Cairn lands will provide a link between the Main Street and the Newcastle South lands, which will link ultimately to Taobh Chnoic.
Second primary school to be fully operational.	School provision is to be provided by DoES – site provided to the east in the Graydon development by Cairn.

Phase	Status
50 sq.m of community floorspace* as part of one facility at, or adjoining, the existing Saint Finian's Community Centre and/or the payment of development contributions towards the provision of community floorspace at this location.	Can be addressed as part of an appropriate condition as part of planning permissions. It is noted SD20A/0037 is to provide a community space of c. 140 sq. m.
<b>Phase 5 (200 dwellings)</b>	
2.2 Ha. open space, preferably as an extension of St. Finian's Hall (shortfall, if any, in play facilities and apparatus will be provided in conjunction with the build out of dwellings)	Not applicable as St. Finian's is located on the northern side of the LAP.

## 9.0 PART V

- 9.1 The applicant has entered into initial discussions with the Housing Department of South County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the Board is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with South Dublin County Council as per their requirements prior to the commencement of development.
- 9.2 The applicants Part V proposals are described and mapped in the Part V material, including costs accompanying this SHD application submission.
- 9.3 We also refer the Board to the letter from Eversheds Sutherland confirming that the lands were acquired on the 30<sup>th</sup> of June 2016 and eligible for a 10% Part V provision.
- 9.4 In addition, we refer the Board to Appendix 1 of the SHD application form which provides a letter dated 31<sup>st</sup> May 2022 from the Housing Department of South Dublin County Council which confirms that:

*“representatives from the Housing, Social and Community Development Directorate have held discussions with Cairn Homes regarding compliance with the objective of providing a Traveller Group Housing Scheme under a Part V agreement in the Newcastle area in accordance with South County Council's Development Plan 2016-2022. The Council can confirm that Cairn Homes proposals to fulfil the Traveller Accommodation objective are satisfactory.”*

## 10.0 RECOMMENDED PLANNING CONDITIONS

10.1 The applicant respectfully requests that consideration of appropriate conditions as set out below are reviewed and included in a grant of planning permission.

### 10.1 Taking in Charge

10.2 Carin Homes are proposing the following condition:

*“(a) The development, including all roads, footpaths, cycle paths, verges, public lighting, open spaces, surface water drains, attenuation infrastructure and all other services, as permitted under this order, and as amended by the conditions of this permission, shall be carried out and completed in accordance with the “taking-in-charge” standards of the planning authority. The areas to be taken in charge, upon completion of the development, shall be in accordance with the areas shown on drawing number MOLA - XX - 00 - DR - A - XX - 0121 - S0, unless otherwise agreed with the local authority.*

*“(b) The areas not to be taken in charge, as defined by this condition, shall be maintained by a properly constituted private management company, details of which shall be agreed in writing with the planning authority.*

*“(c) All of the areas of public open space to be taken in charge shall be maintained by the developer until such time as the development is taken in charge by the local authority.”*

### 10.2 Finishes

10.3 Carin Homes are proposing the following condition:

*“Details of the materials, colours and textures of all the external finishes to the proposed dwellings and buildings shall be as submitted with the application, unless otherwise agreed in writing with, the planning authority prior to commencement of development.”*

### 10.3 Car Parking Management

10.4 Carin Homes are proposing the following condition:

*“Prior to the occupation of the development, a Parking Management Plan shall be prepared for the development and shall be submitted to and agreed in writing with the planning authority. This plan shall provide for the permanent retention of the designated residential parking spaces and shall indicate how these and other spaces within the development shall be assigned and managed.”*

### 10.4 Community Space

10.5 Cairn Homes are proposing the following condition:

*“Prior to commencement of development the applicant shall pay a financial contribution in respect of the enhancement of community space in accordance with the terms of the Newcastle Local Area Plan, 2012. Details of the payment shall be agreed between the Planning Authority and the applicant or in default of agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms in accordance with the Newcastle LAP.”*  
*Reason: To comply with the Phasing requirements of the Newcastle LAP*

## 11.0 CONCLUSIONS

11.1 The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. At a national and regional level, this statement has demonstrated the consistency of the development with the following:

- National Planning Framework;
- Regional Economic and Spatial Strategy for the East and Midlands Region 2019;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Urban Development and Building Height Guidelines (December 2018);
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Draft Water Services Guidelines for Planning Authorities (2018).

11.2 Consistency is also demonstrated with the policies and provisions of the South Dublin Development Plan (2016-2022), the Draft South Dublin Draft County Development Plan (2022-2028, March 2022 including material amendments) and the Newcastle Local Area Plan (2012, as extended to 2022), which are the key planning policy documents at a local level.

11.3 Justification is provided in the Material Contravention Statement prepared by John Spain Associates where objectives are not consistent with the relevant plans.

11.4 It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development comprising residential, open space, and a creche on the subject lands.

11.5 The proposed development will result in a residential density of c. 33.1 units per hectare Gross (37.1 net), which is considered appropriate having regard to the location of the subject lands, on serviced lands in close proximity to existing services and amenities

11.6 In conclusion, it is respectfully submitted that the proposed development is of a suitable form, design and scale of development for this strategically located underutilised site, within an existing urban settlement which is suited to the scale and nature of development proposed.

11.7 The proposed development is considered to be wholly compliant in the context of national, regional and local planning policy and will deliver a mix of high-quality residential apartments at an accessible and well-serviced location. On this basis, it is respectfully submitted that the proposed development should be granted permission.