



THORNTON O'CONNOR
TOWN PLANNING

Planning Report &
Statement of Consistency

Kilternan Village SHD

Planning Report & Statement of Consistency

In respect of a Strategic Housing Development comprising 383 No. residential units and a Neighbourhood Centre

At lands at Wayside, Enniskerry Road and Glenamuck Road, Kilternan, Dublin 18

Submitted on Behalf of Liscove Limited

June 2022

- 1.0 INTRODUCTION**
- 1.1 Multi-Disciplinary Team
- 2.0 DESCRIPTION OF THE DEVELOPMENT**
- 3.0 SITE LOCATION, DESCRIPTION AND CONTEXT**
- 3.1 Site Location and Description
- 3.2 Zoning of the Subject Site
- 3.3 Site Context
- 3.4 Site Accessibility
- 4.0 PLANNING HISTORY**
- 4.1 Overview of Relevant Planning History at the Subject Site
- 4.1.1 DogA/0471 – Development comprising 161 No. Residential Units, 4 No. Retail Units, 10 No. Office Units and 1 No. Creche
- 4.2 Planning History of Site Vicinity
- 4.2.1 Residential Planning Applications at Rockville
- 4.2.2 Recent Strategic Housing Development Applications
- 4.3 ABP-303945-19 - Glenamuck District Roads Scheme
- 4.4 PC/1C/01/21 - DLRCC Part 8 Application for a Public Park and Recreational Facilities on lands adjacent to Glenamuck South
- 4.5 Summary of the Surrounding Development Context
- 5.0 DESCRIPTION OF PROPOSED DEVELOPMENT**
- 5.1 Description of Development
- 5.2 Key Site Statistics
- 5.3 Derelict Buildings to be Demolished
- 5.4 Residential Unit Mix
- 5.5 Neighbourhood Centre
- 5.6 Height and Massing
- 5.7 Pedestrian and Vehicular Access Points
- 5.8 Landscaping and Open Spaces
- 5.9 Proposed Character Areas Within the Scheme
- 6.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY**
- 6.1 *Project Ireland 2040 – The National Development Plan 2021-2030*
- 6.2 *Project Ireland 2040: National Planning Framework*
- 6.2.1 Introduction
- 6.2.2 National Strategic Outcomes and Objectives
- 6.2.3 Population Growth and Employment
- 6.2.4 Current Trends in Tenure and Household Formation in Ireland
- 6.2.5 Sustainable Modes of Transport
- 6.2.6 Scale, Massing and Design
- 6.2.7 Waste and Environmental Issues
- 6.3 *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)*
- 6.4 *Housing for All– a New Housing Plan for Ireland, September 2021 (“Housing for All”)*
- 6.5 *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) (“Building Height Guidelines”)*

- 6.6 *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2020 (“Apartment Guidelines, 2020”)*
- 6.7 *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*
- 6.8 *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)*
- 6.9 *Retail Planning Guidelines for Planning Authorities (2012)*
- 6.10 *Design Manual for Urban Roads and Streets (2019)*
 - 6.10.1 Policy Background
 - 6.10.2 Site Layout and Legibility
 - 6.10.3 Sustainable Transport
- 6.11 *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*
- 6.12 *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016*

- 7.0 **STATEMENT OF CONSISTENCY - REGIONAL POLICY**
 - 7.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*
 - 7.2 *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*

- 8.0 **STATEMENT OF CONSISTENCY - LOCAL POLICY**
 - 8.1 *Dún Laoghaire-Rathdown County Development Plan 2022-2028*
 - 8.1.1 Core Strategy
 - 8.1.2 Zoning
 - 8.1.3 Compliance with the Development Management Standards of the *Development Plan* (Chapter 12)
 - 8.1.4 Compliance with the Other Relevant Policy Objectives of the *Development Plan*
 - 8.2 *Kiltarnan-Glenamuck Local Area Plan 2013-2018 (Extended to September 2023)*
 - 8.2.1 Introduction
 - 8.2.2 Phasing of Development
 - 8.2.3 Building Height
 - 8.2.4 Land Parcel 20A and 22 Development Parameters
 - 8.2.5 Response to Relevant Primary Objectives set out in the *Kiltarnan LAP*
 - 8.2.6 *Kiltarnan Neighbourhood Framework Plan*
 - 8.3 Summary

- 9.0 **CONCLUSION**

1.0 INTRODUCTION

1.1 Multi-Disciplinary Team

Thornton O'Connor Town Planning in association with a multidisciplinary team as detailed in the table below, have been retained by Liscove Limited¹ to prepare this Planning Report and Statement of Consistency in respect of a proposed strategic housing development comprising 383 No. units and 'Neighbourhood Centre', which will provide a creche, office, medical, retail and convenience/retail units on Lands at Wayside at Enniskerry Road, Kilternan, Dublin 18.

COMPANY NAME	DOCUMENTS PREPARED
<p>Thornton O'Connor Town Planning</p> <p>No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89</p>	<ul style="list-style-type: none"> • Planning Report and Statement of Consistency • Material Contravention Statement • Response to ABP Opinion • Planning Application Form • Site Notice • Newspaper Notice
<p>McCrossan O'Rourke Manning Architects</p> <p>No. 1 Grantham St, Saint Kevin's, Dublin 8</p>	<ul style="list-style-type: none"> • Architectural Drawings • Schedule of Accommodation • Housing Quality Assessment Table • Design Statement • Universal Access Statement • Lifecycle and Management Report
<p>Roger Mullarkey & Associates</p> <p>Duncreevan, Kilcock, Co. Kildare</p> <p>and</p> <p>PUNCH Consulting Engineers</p> <p>Carnegie House, Library Road, Dun Laoghaire, Co. Dublin</p>	<ul style="list-style-type: none"> • Engineering Infrastructure Report and Stormwater Impact Assessment • Site Specific Flood Risk Assessment • Engineering Drawings
<p>Ronan Mc Diarmada & Associates Limited Landscape Architects & Consultants (RMDA)</p> <p>Tootenhill Cottages, Rathcoole, Co. Dublin, D24 XA02</p>	<ul style="list-style-type: none"> • Landscape Plan & Drawings • Landscape Rationale

¹ 1st Floor, Maple House, Lower Kilmacud Road, Stillorgan, Co. Dublin

<p>Atkins Ireland</p> <p>Atkins House, No. 150 Airside Business Park, Swords, Co. Dublin</p>	<ul style="list-style-type: none"> • Traffic and Transport Assessment Report (+ input to EIAR in relation to traffic) • Mobility Management Plan • Outline Construction Management Plan • Quality Audit
<p>Scott Cawley Limited</p> <p>College House, Nos. 71-73 Rock Rd, Intake, Blackrock, Co. Dublin</p>	<ul style="list-style-type: none"> • Appropriate Assessment Screening Report • Biodiversity Chapter (EIAR)
<p>3D Design Bureau</p> <p>No. 65 Rock Rd, Blackrock, Dublin, A94 PT62</p>	<ul style="list-style-type: none"> • Photomontages and Computer Generated Images • Daylight and Sunlight Assessment Report
<p>Liscove Limited</p> <p>1st Floor, MapleHouse, Lower Kilmacud Road Stillorgan Co. Dublin</p>	<ul style="list-style-type: none"> • Part V Costings
<p>Enviroguide Consulting</p> <p>3D Core C Block 71 The Plaza Park West Dublin D12 F9TN</p>	<ul style="list-style-type: none"> • Construction Environmental Management Plan • Construction and Demolition Waste Management Plan • Outline Operational Waste Management Plan • Climate Impact Assessment Report • Hydrological and Hydrogeological Risk Assessment
<p>KPMG Future Analytics</p> <p>No. 23 Fitzwilliam Square South Dublin Do2, RVo8</p>	<ul style="list-style-type: none"> • Social Infrastructure Audit and Retail Services Assessment
<p>Arborist Associates Limited</p> <p>No. 94 Ballybawn Cottages, Ballybawn,</p>	<ul style="list-style-type: none"> • Tree Survey/Constraints/Protection • Arboricultural Assessment Report

Enniskerry, Co. Wicklow	
Waterman Moylan EastPoint Business Park, Alfie Byrne Rd, East Wall, Dublin 3, D03 H3F4	<ul style="list-style-type: none"> • Energy Statement
Sabre Electrical Services Limited Unit 11 Bellevue Industrial Estate Finglas Dublin 11 D11 VN59	<ul style="list-style-type: none"> • Lighting Drawings and Calculations Report
Independent Site Management 77 Camden Street Lower Dublin 2 D02 XE80	<ul style="list-style-type: none"> • Telecommunications Report
RSK Ireland Limited Bluebell Business Centre Old Naas Road Bluebell Dublin 12	<ul style="list-style-type: none"> • Acoustic Design Statement

1.2 Purpose of this Report

The Design Team consider that there is scope within the subject site to provide an appropriate response to the current housing shortage prevailing within Dun Laoghaire-Rathdown and the wider Dublin region, which will provide for the delivery of compact and consolidated growth. This will be fully detailed throughout this Report.

The *Planning & Development (Strategic Housing Development) Regulations 2017* specify that all SHD applications must be accompanied by a statement demonstrating that the proposal is consistent with the relevant National, Regional and Local policies. The Statement of Consistency outlined in Sections 6.0, 7.0 and 8.0 of this Report demonstrates that the proposed scheme providing 383 No. residential units and a Neighbourhood Centre is consistent with national, regional and local planning policy.

The following documents are discussed throughout this Statement:

National

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Housing for All– a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2020);*
7. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
8. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009);*
9. *Retail Planning Guidelines for Planning Authorities (2012);*
10. *Design Manual for Urban Roads and Streets (2019);*
11. *The Planning System and Flood Risk Management (2009); and*
12. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016.*

Regional

13. *Regional Planning Guidelines for the Greater Dublin Area 2010-2022;*
14. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031; and*
15. *Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

16. *Dun Laoghaire - Rathdown County Development Plan 2022-2028; and*
17. *The Kilternan Local Area Plan 2013-2018 (As Extended to September 2023) [including the Kilternan Neighbourhood Framework Plan].*

It is through adherence to these documents and reference to their various tests, policies and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional and Local Planning guidance.

2.0 DESCRIPTION OF THE DEVELOPMENT

The subject planning application is classified as a Strategic Housing Development as defined in Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (amended July 2018), which states that Strategic Housing Development means:

- 'a) ***the development of 100 or more houses on land zoned for residential use for a mixture of residential and other uses,***
- b) *the development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon,*
 - i) *development consisting of shared accommodation units that, when combined contain 200 or more bed spaces, and*
 - ii) *on the zoning of which facilitates the provision of shared accommodation or a mixture of shared accommodation thereon and its application for other uses,*
- c) *development that contains development of the type to which all of the foregoing paragraphs, or any two of the foregoing paragraphs, apply, or*
- d) *the alteration of an existing planning permission granted under section 34 (other than under subsection (3A)) where the proposed alteration relates to development specified in paragraph a), b) or c).'* [Our Emphasis]

Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (amended July 2018) further states that Strategic Housing Developments:

'may include other uses on the land, the zoning of which facilitates such use, but only if—

- (i) ***the cumulative gross floor area of the houses or student accommodation units, or both, as the case may be, comprises not less than 85 per cent, or such other percentage as may be prescribed, of the gross floor space of the proposed development or the number of houses or proposed bed spaces within student accommodation to which the proposed alteration of a planning permission so granted relates, and***
- (ii) *the other uses cumulatively do not exceed—*
 - (I) *15 square metres gross floor space for each house or 7.5 square metres gross floor space for each bed space in student accommodation, or both, as the case may be, in the proposed development or to which the proposed alteration of a planning permission so granted relates, subject to a **maximum of 4,500 square metres** gross floor space for such other uses in any development, or*
 - (II) *such other area as may be prescribed, by reference to the number of houses or bed spaces in student accommodation within the proposed development or to which the proposed alteration of a planning permission so granted relates, which*

other area shall be subject to such other maximum area in the development as may be prescribed.'

As the proposed development comprises 383 No. residential units, it is therefore considered to be a Strategic Housing Development and the application must be lodged directly to An Bord Pleanála. Furthermore, the non-residential element of the proposed scheme (c. 2,512 sq m) represents c. 6% of the total gross floor space of the development and thus must be accepted as a Strategic Housing Development application.

As per the public notices, the SHD is proposed as follows:

Liscove Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 10.8 Ha site at lands at Wayside, Enniskerry Road and Glenamuck Road, Kiltarnan, Dublin 18, which include a derelict dwelling known as 'Rockville' and associated derelict outbuildings, Enniskerry Road, Kiltarnan, Dublin 18, D18 Y199. The site is generally bounded by the Glenamuck Road to the north; Kiltarnan Country Market and the Sancta Maria property to the north and west; a recently constructed residential development named "Rockville" to the north-east; the Enniskerry Road to the south-west; dwellings to the south; and lands that will facilitate the future Glenamuck Link Distributor Road to the east.

Road works are also proposed to facilitate access to the development from the Enniskerry Road; to the approved Part 8 Enniskerry Road/Glenamuck Road Junction Upgrade Scheme on Glenamuck Road (DLRCC Part 8 Ref PC/IC/01/17); and to the approved Glenamuck District Roads Scheme (GDRS) (ABP Ref:HA06D.303945) on the Glenamuck Link Distributor Road (GLDR). Drainage and water works are also proposed to connect to services on the Glenamuck Road and Enniskerry Road.

At the Glenamuck Road access point, this will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table and the changing of the cycle track to a cycle lane at road level as the cycle facility passes the side road junction. Surface water and foul drainage infrastructure is proposed towards the north of the site into the drainage infrastructure to be constructed as part of the Part 8 scheme. Potable water is to be provided from the existing piped infrastructure adjacent to the site along Glenamuck Road. These interfacing works are proposed on an area measuring c. 0.05 Ha.

At the GLDR access point, this will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of short section of shared path and an uncontrolled shared pedestrian and cyclist crossing across the side road junction on a raised table. The works will also include the provision of a toucan crossing, inclusive of the necessary traffic signal equipment, immediately south of the access point to facilitate pedestrian and cyclist movement across the mainline road. All works at the GLDR access point will include the provision of the necessary tactile paving layouts and are provided on an area measuring c. 0.06 Ha.

At the Enniskerry Road, works are proposed to facilitate 3 No. new accesses for the development along with modifications to Enniskerry Road. The 3 No. side road priority access junctions incorporate the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table. The modifications to Enniskerry Road fronting the

development (circa 320 metres) includes the narrowing of the carriageway down to 6.5 metres (i.e. a 3.25 metres running lane in each direction) from the front of the kerb on western side of Enniskerry Road. The remaining former carriageway, which varies in width of c. 2 metres, will be reallocated for other road users and will include the introduction of a widened pedestrian footpath and landscaped buffer on the eastern side of the road adjoining the proposed development. The above works are inclusive of all necessary tie-in works such as new kerb along eastern side of Enniskerry Road, drainage details, road marking, signage and public lighting. Potable water is to be provided from the existing piped infrastructure adjacent to the site along the Enniskerry Road. The interface works on Enniskerry Road measures c. 0.19 Ha.

Surface water and foul drainage infrastructure is proposed to connect into and through the existing/permitted Rockville developments (DLR Reg. Refs. D17A/0793, D18A/0566 and D20A/0015) on a total area measuring c. 0.09 ha. The development site area and drainage and roads works areas will provide a total application site area of c. 11.2 Ha.

The development will principally consist of: the demolition of c. 573.2 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings; and the provision of a mixed use development consisting of 383 No. residential units (165 No. houses, 118 No. duplex units and 100 No. apartments) and a Neighbourhood Centre, which will provide a creche (439 sq m), office (317 sq m), medical (147 sq m), retail (857 sq m), convenience retail (431 sq m) and a community facility (321 sq m). The 383 No. residential units will consist of 27 No. 1 bedroom units (19 No. apartments and 8 No. duplexes), 128 No. 2 bedroom units (78 No. apartments and 50 No. duplexes), 171 No. 3 bedroom units (108 No. houses, 3 No. apartments and 60 No. duplexes) and 57 No. 4 bedroom units (57 No. houses). The proposed development will range in height from 2 No. to 5 No. storeys (including podium/undercroft level in Apartment Blocks C and D and in the Neighbourhood Centre).

The development also provides: pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" development to the north-east and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road; 678 No. car parking spaces (110 No. in the undercroft of Blocks C and D and the Neighbourhood Centre and 568 No. at surface level) including 16 No. mobility impaired spaces, 73 No. electric vehicle spaces, 1 No. car share space, 4 No. drop-off spaces/loading bays; motorcycle parking; bicycle parking; bin storage; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level of the Neighbourhood Centre including shrouds, antennas and microwave link dishes (18 No. antennas and 6 No. transmission dishes, all enclosed in 9 No. shrouds together with all associated equipment); private balconies, terraces and gardens; hard and soft landscaping; sedum roofs; solar panels; boundary treatments; lighting; substations; plant; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 43,120 sq m in addition to undercroft levels (under Apartment Blocks C and D measuring c. 1,347 sq m and under the Neighbourhood Centre measuring c. 2,183 sq m, which includes parking spaces, external storage, bin storage, bike storage and plant).

3.0 SITE LOCATION, DESCRIPTION AND CONTEXT

3.1 Site Location and Description

The application site has an area of c. 11.2 Ha, with a developable site area of 10.8 Ha, and is principally located to the north-east of the Enniskerry Road and to the southern side of the Glenamuck Road, with part of its frontage directly opposite Our Lady of the Wayside Church, Kiltiernan. The lands are located c. 1.9 km – c. 2.3 km to the south-west of the M50 and Carrickmines Retail Park.

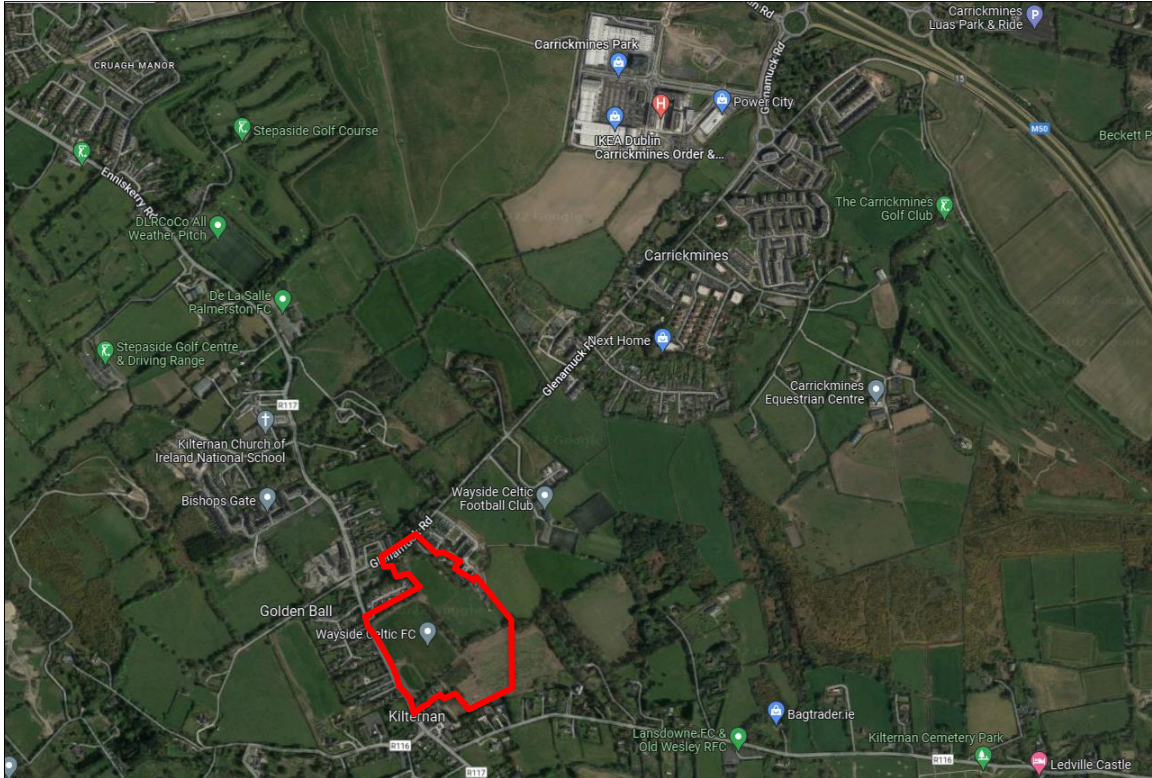


Figure 3.1: Aerial Photograph of the Subject Site with Indicative Boundary of the Developable Site Outlined in Red²

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

Kiltiernan Country Market and the Sancta Maria property are located to the north and west of the site and a recently constructed residential development named "Rockville" is located to the north-east. Lands that will facilitate the future Glenamuck Link Distributor Road are located to the east.

² Redline also extends to the north-east into Rockville to incorporate drainage works. Red line throughout images in this report will relate to the developable site area and doesn't include infrastructure spurs etc.

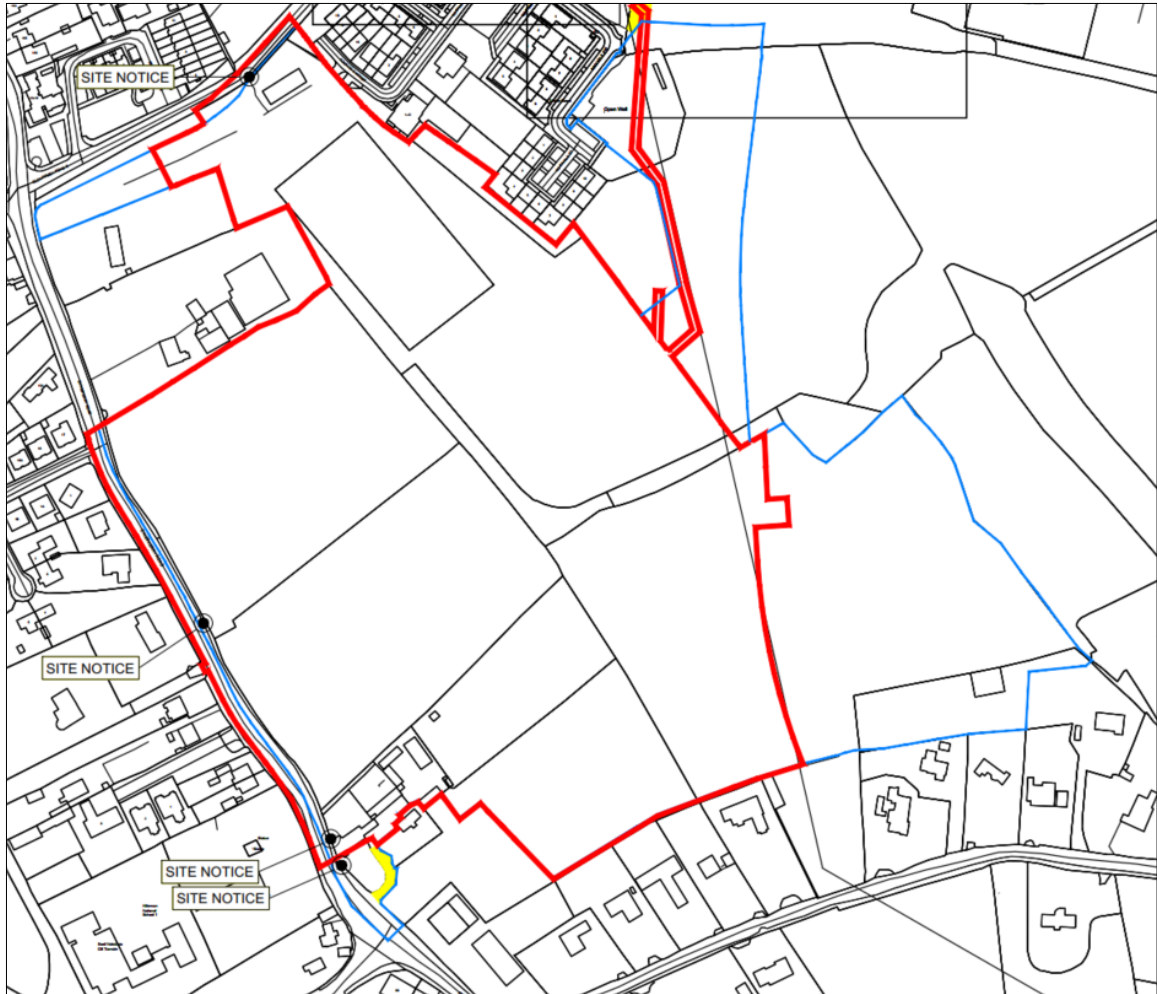


Figure 3.2: Site Location Map Demonstrating the Application Lands in Red and Land in the Ownership of the Applicant in Blue

(Source: **McCrossan O'Rourke Manning Architects, 2022**)

The total red line application site boundary is c. 11.2 Ha (c. 111,532 sq m) and is broken down as follows:

1. The developable site of c. 10.8 Ha (c. 107,625 sq m);
2. Road and drainage works on Glenamuck Road: c. 0.05 Ha (c. 535 sq m);
3. Roadworks at the Glenamuck Link Distributor Road (GLDR) access point: c. 0.06 Ha (c. 550 sq m);
4. Road and drainage works on Enniskerry Road: c. 0.19 Ha (c. 1,879 sq m); and
5. Drainage works connecting into and through the existing Rockville development: c. 0.09 Ha (c. 943 sq m).

3.2 Zoning of the Subject Site

The subject site is zoned 'Objective A' and 'Objective NC' in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, where the stated objectives are:

1. Objective A: *'To provide residential development and improve residential amenity while protecting the existing residential amenities.'*
2. Objective NC: *'To protect, provide for and/or improve mixed-use neighbourhood centre facilities.'*

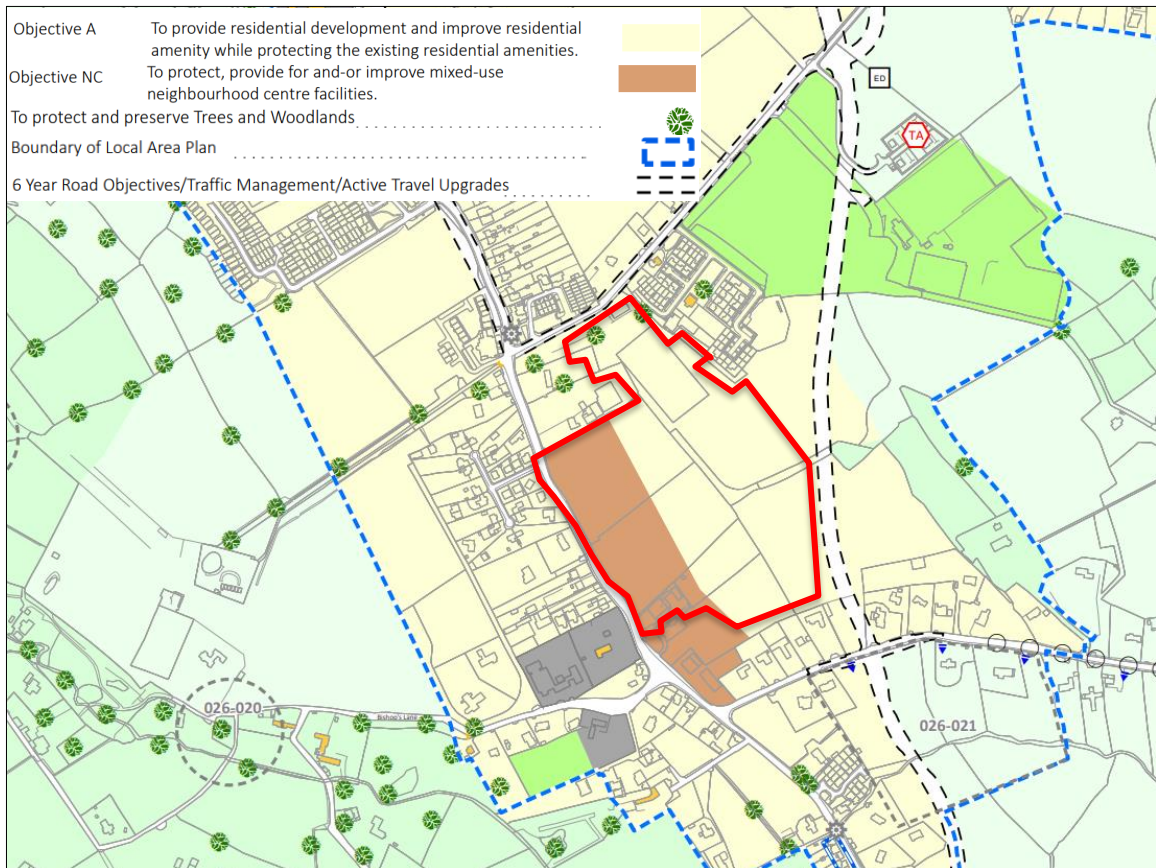


Figure 3.3: Zoning of the Subject Developable Site (Indicatively Outlined in Red)

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2022)

In addition, the lands are located within the *Kilternan-Glenamuck Local Area Plan 2013 - 2019* [extended to 2023] ("*Kilternan LAP*"). Development Parcels 20A and 22 of the *Kilternan LAP* pertain to the subject lands. There are a few parameters related to this parcel within the *Kilternan LAP*, which is further discussed in Section 8.0 of this Report.

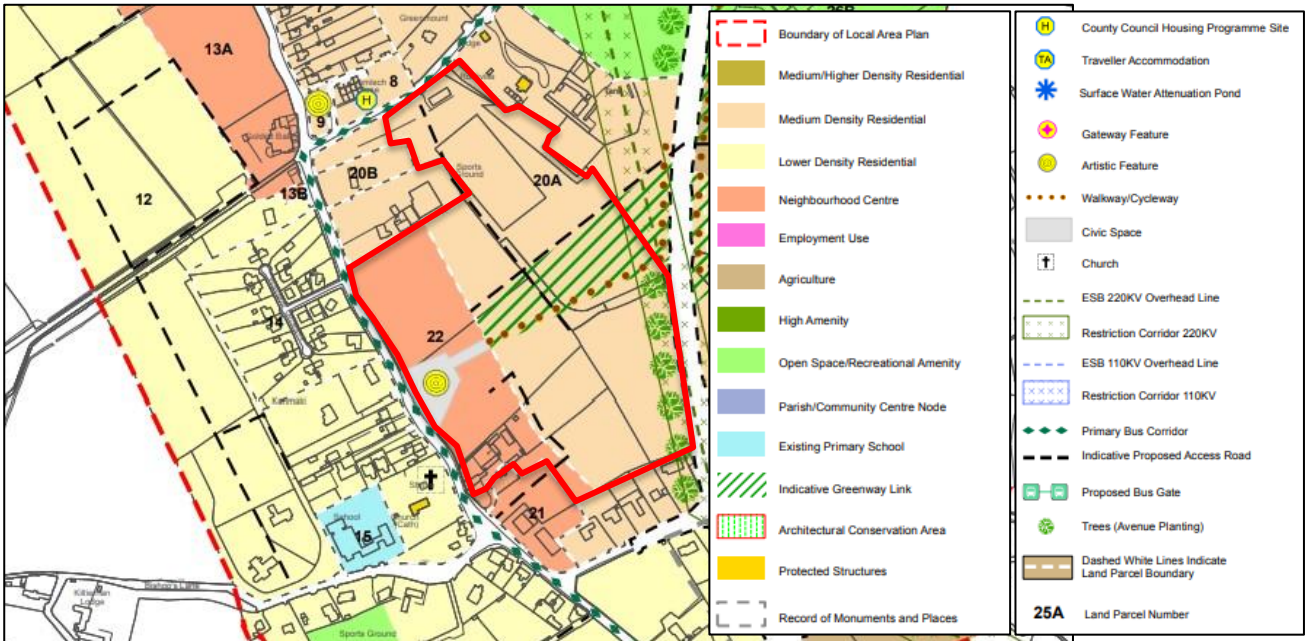


Figure 3.4: Adopted Map from Kiltiernan LAP with Subject Developable Site Indicatively Outlined in Red

(Source: *Kiltiernan LAP*, annotated by Thornton O'Connor Town Planning, 2022)

3.3 Site Context

The area is serviced by bus route Nos. 44, 63 and 118. The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop.

The site is located in Kiltiernan Village with access to a pub/restaurant, a country market, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kiltiernan Church of Ireland National School, Our Lady of the Wayside National School and Kiltiernan Adult Education Centre as well as religious services in the Village such as Kiltiernan Parish Church and Our Lady of the Wayside Church. The proposed development includes a Neighbourhood Centre, which enhance the provision of services for Kiltiernan.

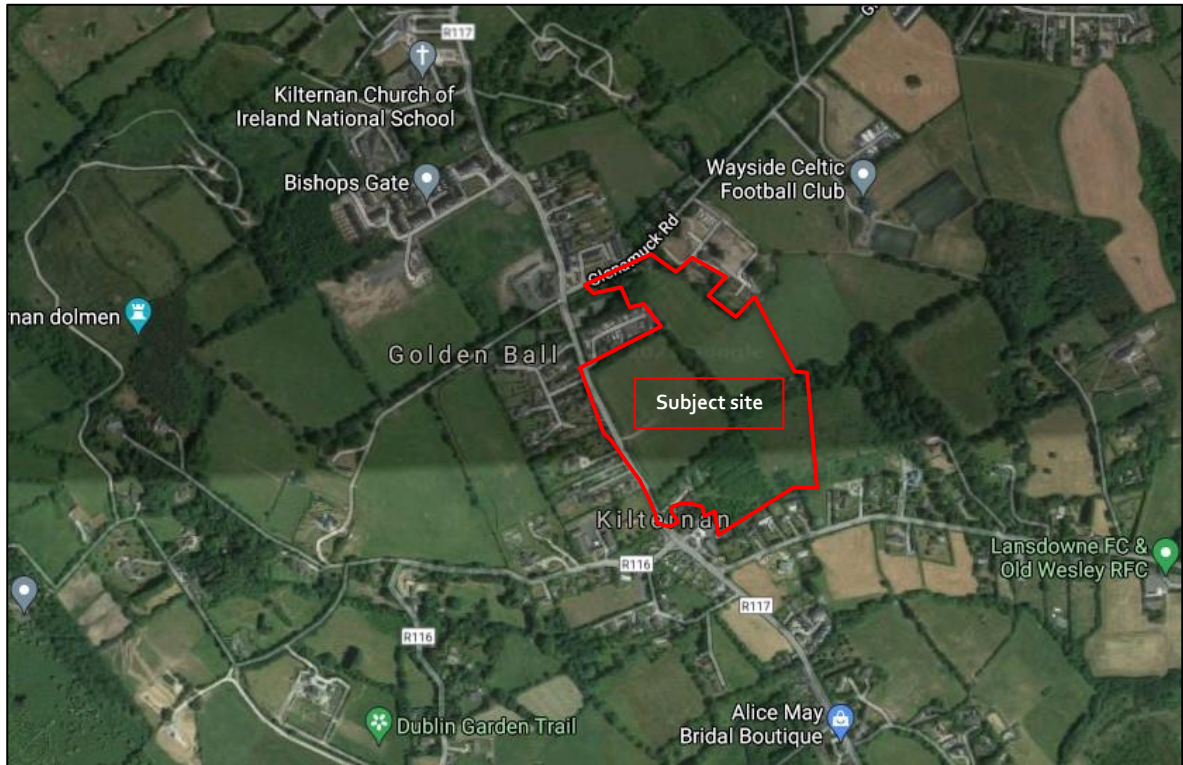


Figure 3.5: Aerial Image with Developable Site Outlined Indicatively in Red

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

Immediately adjoining the lands of the subject site to the north-east is a residential development called Rockville. Phase No. 1 was permitted in 2017 (DLRCC Reg. Ref. D17A/0793) which comprised 49 No. dwellings consisting of 37 No. detached semi-detached and terraced 2/3 No. storey houses and 12 No. apartments. This permission was amended under DLRCC Reg. Ref. D19A/0242 to provide an additional 2 No. units.

Phase No. 2A (DLRCC Reg. Ref. D18A/0566 as amended by D18A/1191) of the development was granted permission to provide 5 No. 2.5 storey, 4-bedroom houses, whilst Phase No. 2B was granted permission in September 2020 under DLRCC Reg. Ref. D20A/0015 (ABP Reg. Ref. ABP-306999-20). The second phase (2B) of this development comprises a 4 No. storey apartment block consisting of 56 No. units, a gym facility and a creche. Subsequent to this permission being secured, the Applicant, Liscope Limited has purchased this neighbouring apartment site. The subject application proposes links into Rockville which is detailed further in Section 5.0.

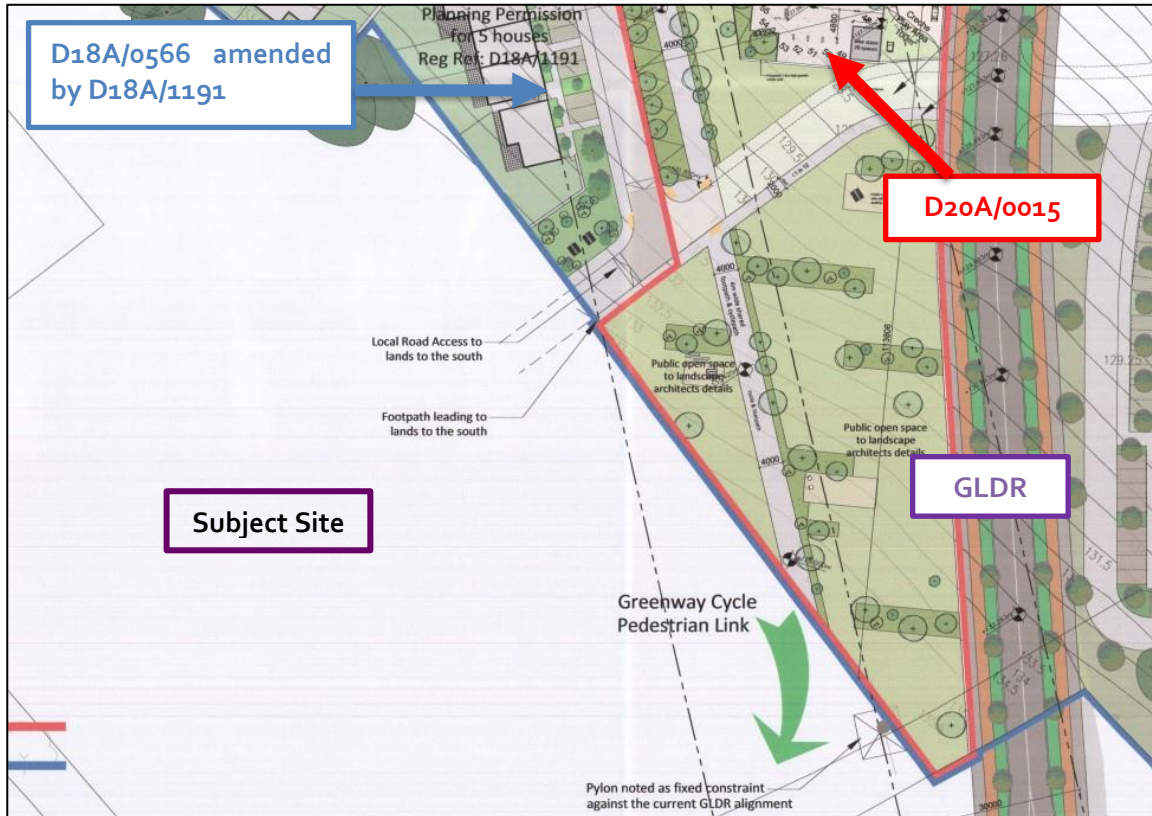
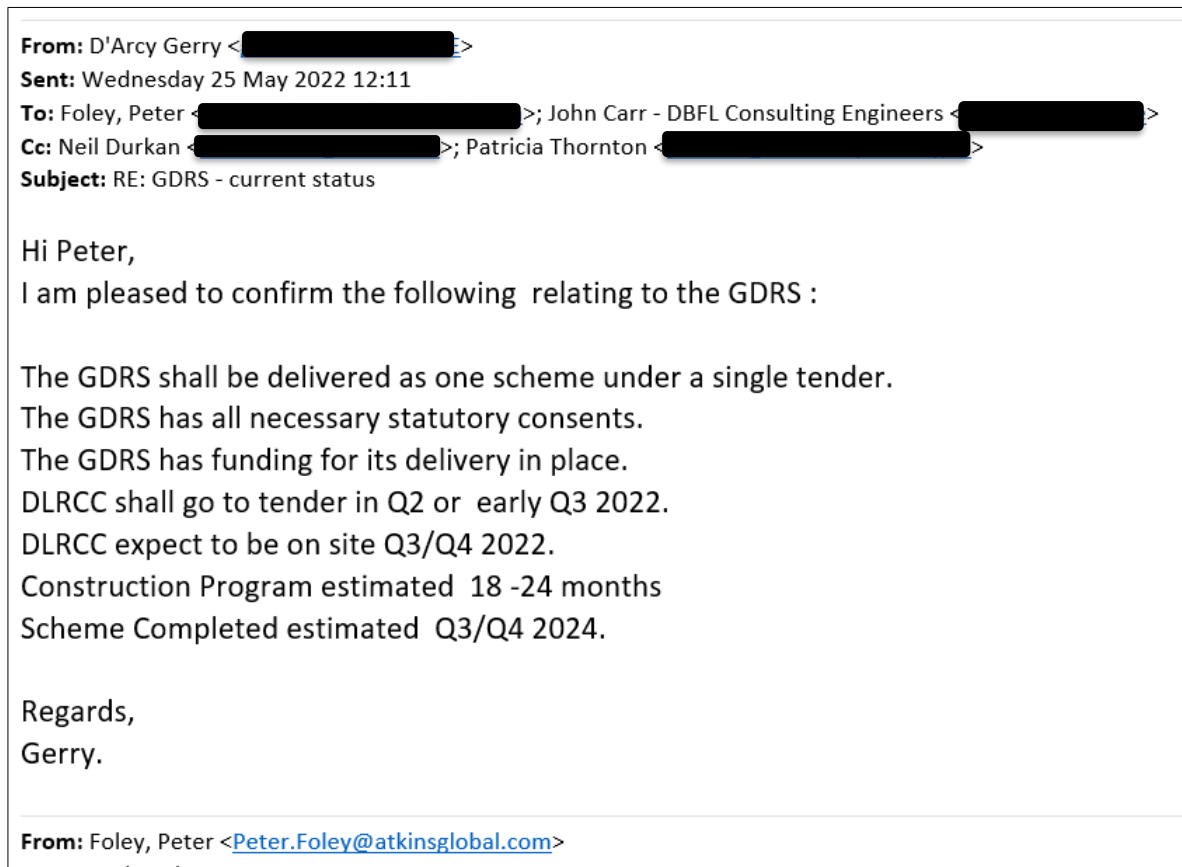


Figure 3.6: Proposed Site Plan Under DLRC Reg. Ref. D20A/0015 in the Context of the Subject Application Lands

(Source: DLRC Reg. Ref. D20A/0015 Layout Plan, annotated by Thornton O'Connor Town Planning, 2022)

The Glenamuck District Roads Scheme (GDRS) relates to road proposals servicing the Carrickmines area between the Enniskerry Road and the Glenamuck Road. The scheme consists of The Glenamuck District Distributor Road (GDDR) and the Glenamuck Link Distributor Road (GLDR), which will connect the existing Enniskerry Road and the Glenamuck Road with the new link distributor road, connecting to the Ballycorus Road to the south.

The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18th December 2019 (ABP Reg. Ref. HA06D.303945) and is projected to begin construction in Q3/Q4 2022 (as advised by Gerry D'Arcy by email [Dun Laoghaire -Rathdown County Council] on 25th May 2022 – see below).



The GLDR runs directly adjacent to the Rockville development and the subject site. The subject development proposes a vehicular access to the future GLDR and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future GLDR.

3.4 Site Accessibility

The subject site is proximate to several important transport facilities in the vicinity. The Ballyogan Wood LUAS stop is located c. 2.3 km – c. 2.7 km to the north-east (c. 26-31 minutes walking distance). Access to the M50 Carrickmines (Exit 15) is located c. 1.9 km – c. 2.3 km from the subject site, a c. 3-4 No. minute car journey away.

Bus route Nos. 44, 63 and 118 serve the Kiltarnan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kiltarnan within the Bus Connects scheme will serve Kiltarnan Village and offer transport links to Dublin City Centre and other suburbs and employment locations and education facilities in the Greater Dublin Area such as University College Dublin.

Figure 3.7 below illustrates existing and proposed transport access in the vicinity which supports the proposed development.



Figure 3.7: Surrounding Road and Public Transport Infrastructure within a c. 2.5 km Radius of the Subject Lands

(Source: Maps.ie, annotated by Thornton O'Connor Town Planning, 2022)

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines (Exit 15) and the proposed GDRS scheme, which will remove a large amount of through traffic from the village, this makes Kilternan Village a hub for activity and increases the area's potential to becoming a model suburban village. Planning permission has recently been granted for many Strategic Housing Developments in the area, which are outlined in Section 4.0. The proposed development will contribute towards delivering compact growth, especially as some of the recently granted developments in Kilternan are located further from the village core.

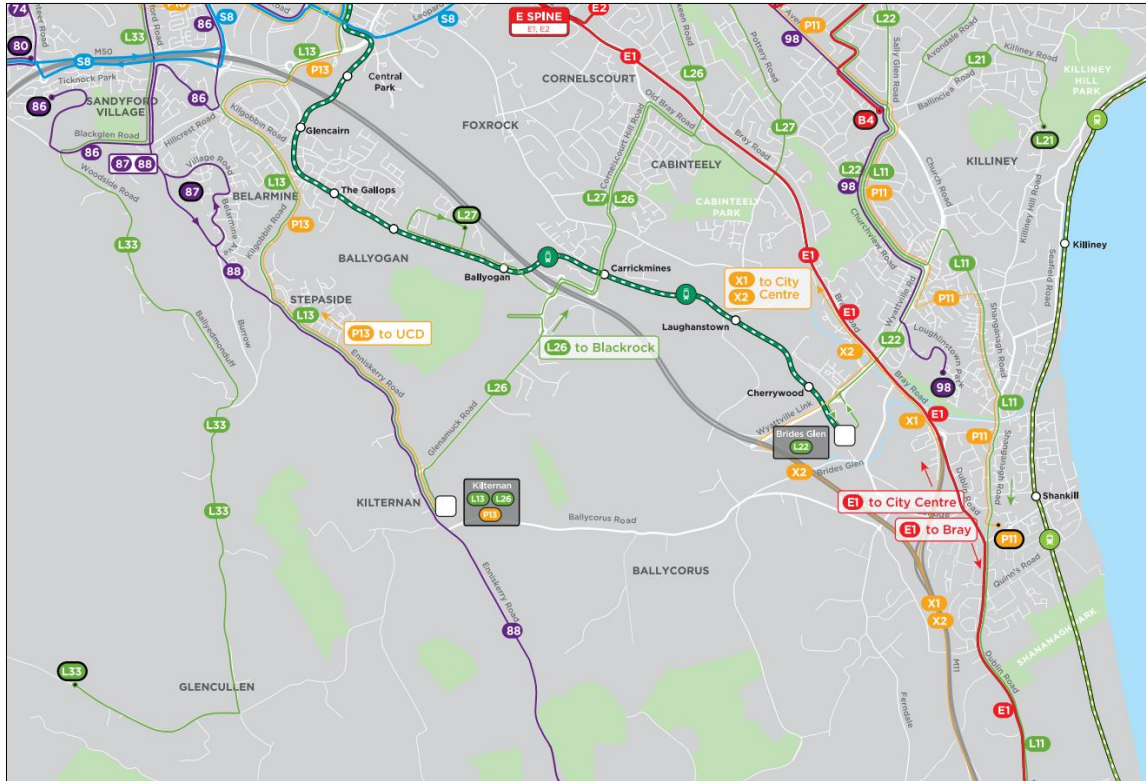


Figure 3.8: Bus Connects Scheme Route Proposal for South Dublin/ Kilternan Area

(Source: Bus Connects.ie)

4.0 PLANNING HISTORY

4.1 Overview of Relevant Planning History at the Subject Site

According to the Dun Laoghaire-Rathdown County Council Online Planning Database, part of the developable lands have been subject to 1 No. planning application outlined below:

4.1.1 DogA/0471 – Development comprising 161 No. Residential Units, 4 No. Retail Units, 10 No. Office Units and 1 No. Creche

Planning permission was previously refused for development on part of the subject site (c. 5.97 hectares) as detailed below:

Reg. Ref:	DogA/0471 [PLo6D.236630]
Location:	Enniskerry Road, Kilternan, Co. Dublin
Application Date:	1 st July 2009
Development Description:	<p>Permission for demolition of the existing changing rooms building on site and the construction of a mixed-use scheme comprising 161 No. residential units, 4 No. retail units, 10 No. office units and 1 No. creche. The residential element of the scheme will comprise of 88 No. houses; 35 No. apartment units; and 38 No. duplex units. The apartments and duplex units will be provided in 4 No. 3 storey and 1 No. 4 storey blocks. All apartments provided with balconies and / or terraces.</p> <p>The commercial element of the scheme will be accommodation in 2 No. 1-2 and 3 storey blocks and will comprise of 4 No. retail units; 10 No. office units and 1 No. crèche facility. 1 No. signage display at the entrance to the site at Enniskerry Road.</p> <p>The scheme will be accessed via 2 No. vehicular access points (1 No. off Enniskerry Road to the west and 1 No. off Glenamuck Road to the north).</p> <p>New vehicular accesses will also be provided to "Rockville" to the north-east of the site and to lands to the south-east of the site via proposed new internal access roads. Provision of a total of 369 No. car parking spaces and 80 No. bicycle parking spaces at surface level.</p>
DLR Decision:	Refuse Permission
DLR Decision Date:	30 th March 2010
ABP Decision:	Refuse Permission
ABP Decision Date:	5 th October 2010

Under DLRCC Reg. Ref. DogA/0471, permission was sought for the development of a mixed-used scheme including 161 No. residential units, 10 No. office units, 4 No. retail units and 1 No. creche at the subject lands.

Permission was refused by Dun Laoghaire-Rathdown County Council for 4 No. reasons relating to, in summary, trees, design and finishes, internal roads layout and lack of provision of childcare

facilities. On Appeal, An Bord Pleanála refused permission for the development proposal on 5th October 2010 for the following reason:

'Having regard to the existing features of the site, which include a substantial quantity of mature trees and hedgerow, and having regard to the layout indicated in the Kiltiernan Neighbourhood Framework Plan 2010, which includes the retention of these trees, it is considered that the layout as proposed, including extensive removal of viable trees and hedgerow to the east of Enniskerry Road and continuous car-parking to the front of the residential units, would fail to have adequate regard to the framework plan, would seriously injure the amenities of the area and of future occupants and would, therefore, be contrary to the proper planning and sustainable development of the area.'

We note that the subject scheme retains a larger quantum of trees than the previous scheme at the subject site, which is a positive aspect associated with the proposed development.

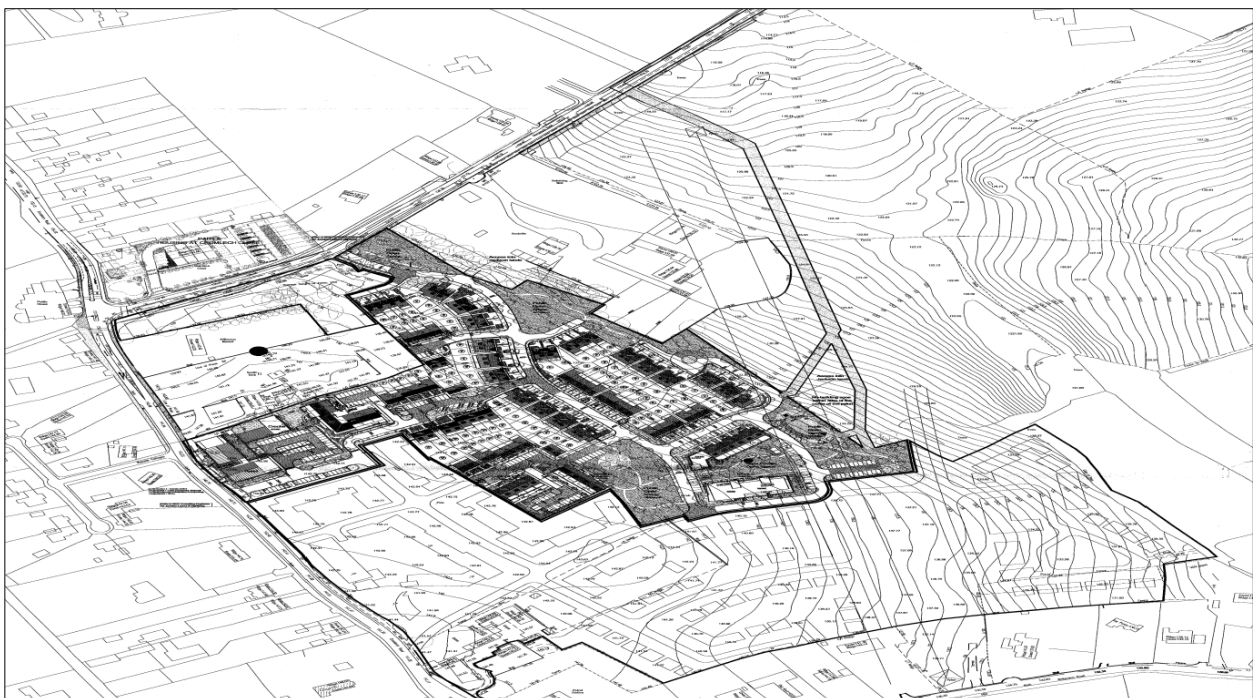


Figure 4.1: Proposed Site Layout Plan for the Subject Site under DLR Reg. Ref. D09A/0471

(Source: Dún Laoghaire-Rathdown County Council Online Planning Database, DLR Reg. Ref. D09A/0471)

4.2 Planning History of Site Vicinity

Permissions has been granted recently for several schemes in Kiltiernan. These are details below.

4.2.1 Residential Planning Applications at Rockville

These lands are located to the north-east of the subject site.

Location:	Lands at Rockville House, Glenamuck Road South, Dublin 18, and Gatelodge (also known as Rockville Lodge)
DLRCC Reg. Ref.: Application Date: Development Description:	D17A/0793 6 th September 2017 This development will be the first phase of development on the residential zoned lands at Rockville House. Demolition of existing agricultural outbuildings on site; Retention of Rockville House to provide for 2 No. separate residential dwellings. Construction of a total of 49 No. dwellings consisting of 37 No. detached, semi-detached and terraced 2/3 storey houses and 12 No. apartments. The apartments will be provided within 1 no. four storey apartment block. Provision of 95 No. car parking spaces and a new vehicular access from Glenamuck Road South.
DLRCC Decision: DLRCC Decision Date: Final Grant Date:	Grant Permission subject to 38 No. conditions 14 th December 2017 25 th January 2018
DLRCC Reg. Ref.: Application Date: Development Description:	D18A/0566 amended by D18A/1191 13 th June 2018 Phase 2A of Rockville: Construction of 6 No. four-bed houses on a site south of Rockville House, with building heights of 2.5 No. storeys. The development will be accessed from the permitted local road within the adjoining the residential development to the north.
DLRCC Decision: DLRCC Decision Date: Note:	Grant Permission subject to 26 No. conditions (1 No. dwelling removed therefore permissions granted for 5 No. dwellings) 2 nd October 2018 Under DLR Reg. Reg. D18A/1191, an amendment application was submitted, which sought a change of house types only. Permission was granted by the Planning Authority on 19 th February 2019, which was subject to a Third Party Appeal to An Bord Pleanála (ABP-303871-19). Permission was ultimately granted on 24 th June 2019 subject to 11 No. conditions.
DLRCC Reg. Ref.: Application Date: Development Description:	D20A/0015 13 th January 2020 Phase No. 2B of Rockville: The application site is located to the south-east of the Phase 1 residential development permitted under Reg. Ref.: D17A/0793. The construction of a four-storey apartment block comprising of 56 No. residential units. The apartment block includes a 50.6 sq m gym, a 126 sq m creche, and private, communal, and public open space. The proposed development will connect to the infrastructure and services in the permitted Phase 1 residential development to the north-west and provide for future connections to other adjoining lands.
DLRCC Decision: DLRCC Decision Date: ABP Reg. Ref. ABP Decision ABP Decision Date:	Refuse Permission 6 th March 2020 ABP-306999-20 Grant Permission subject to 19 No. conditions 22 nd September 2020

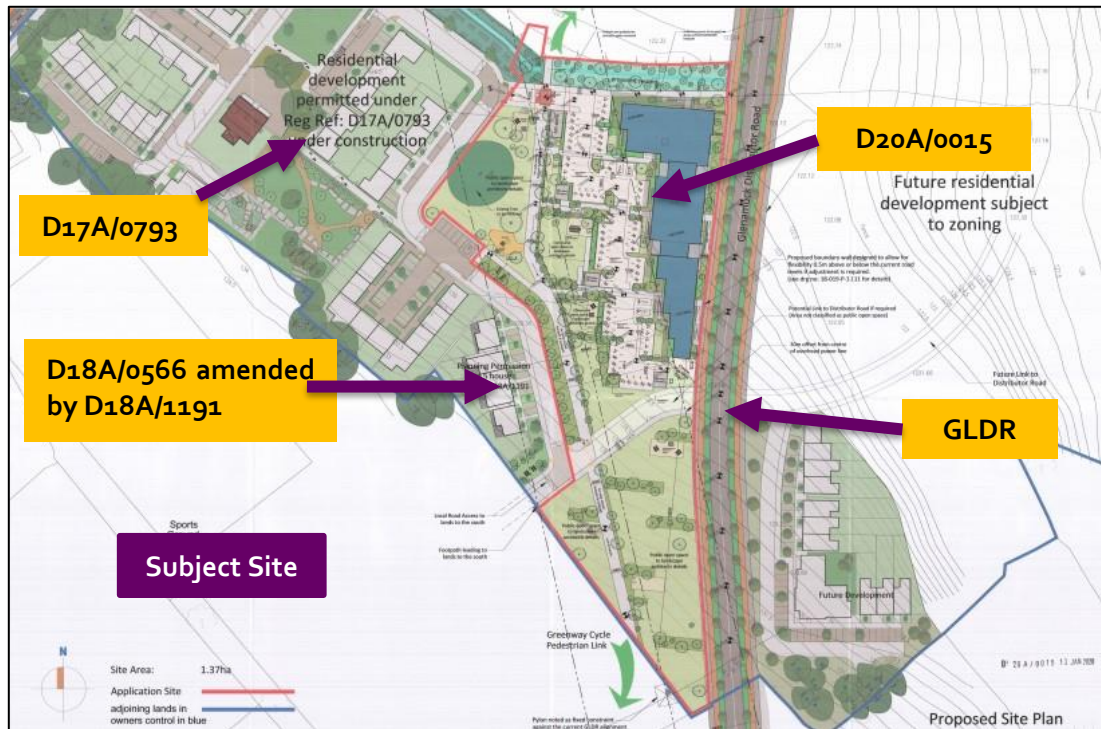


Figure 4.2: Proposed Site Plan Under DLRCC Reg. Ref. D20A/0015 in the Context of the Subject Application Lands

(Source: DLRCC Reg. Ref. D20A/0015, annotated by Thornton O’Connor Town Planning, 2022)

4.2.2 Recent Strategic Housing Development Applications

This section will outline recent Strategic Housing Development (SHD) Planning Applications in the vicinity of the subject site. A summary table is included below which refers to the numbers on the map following the table. Full details of each SHD are provided following this summary table and map.

No.	SHD	ABP Reg. Ref.
1.	Glenamuck Road/ Enniskerry Road SHD	ABP-306160-19
2.	Glenamuck Road SHD	ABP-303978-19
3.	Glenamuck Road South Amendment Application	ABP-312216-21
4.	Shaldon Grange SHD	ABP-307506-20
5.	Shaldon Grange SHD Relodge	ABP-312214-21
6.	Suttons Field SHD	ABP-307043-20
7.	Enniskerry Road SHD [Adjoining Bishop’s Gate]	ABP-309846-21

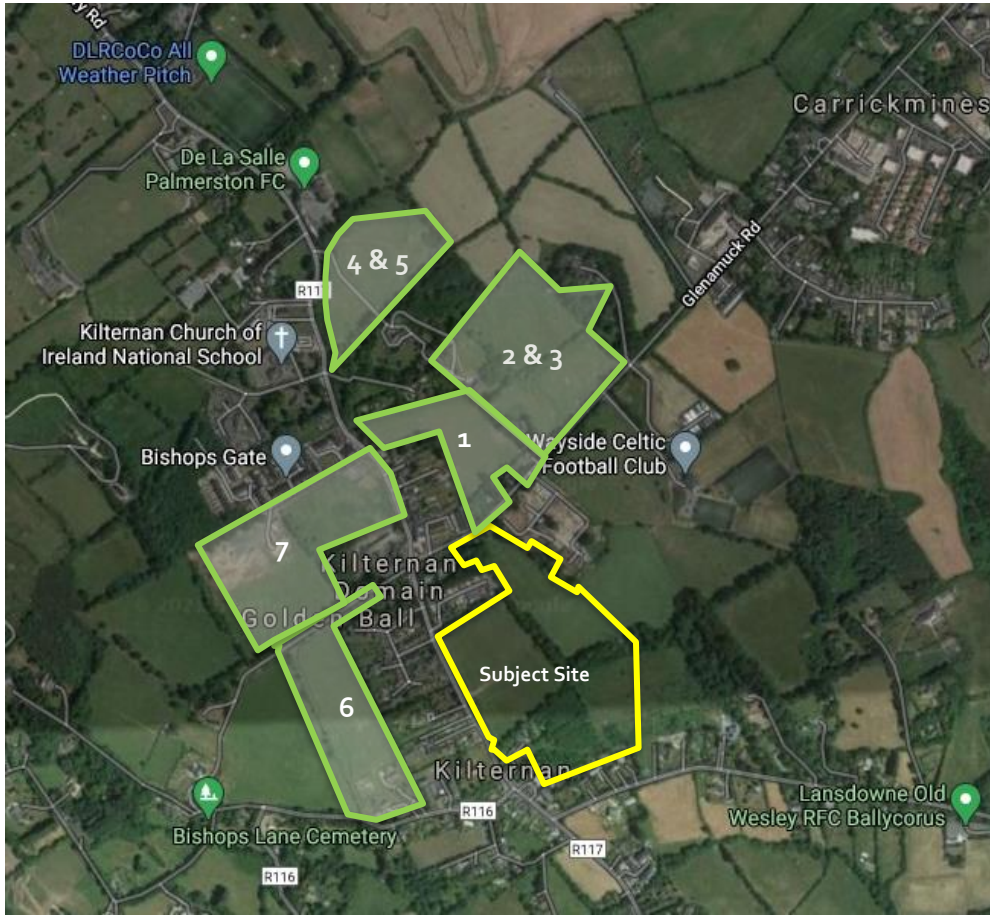


Figure 4.3: Recent SHD Planning Applications in Kiltiernan Village in the Vicinity of the Subject Site (Yellow=Indicative Subject Lands, and Green=Granted SHD)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

1. ABP-306160-19: Glenamuck Road / Enniskerry Road SHD (197 No. Residential Units)

ABP Reference:	ABP-306160-19
Location:	Glenamuck Road / Enniskerry Road, Kiltiernan, Dublin 18, D18 X5H2
Application Date:	13 th December 2019
Development Description:	Permission for a strategic housing development consisting of: 1) the demolition of 2 No. habitable dwellings on the site - 'Greenmount' (195 sq m) and 'Dun Óir' (345 sq m inclusive of ancillary buildings); 2) i) the construction of a 197 No. unit residential development comprising: 62 No. houses and 115 No. apartments in 7 No. blocks ranging in height from 3 to 4 No. storeys, and 20 No. duplex apartments in 4 No. three storey blocks; (ii) a 275 sq m crèche; (iii) the construction of the link access road between Enniskerry Road and Glenamuck Road required under the Kiltiernan/Glenamuck Local Area Plan 2013 including vehicular access points onto Enniskerry Road and Glenamuck Road. (www.kiltiernandoranplanning.com).
ABP Decision Date:	6 th April 2020
ABP Decision:	Grant Permission subject to 31 No. conditions



Figure 4.4: Site Layout of the Glenamuck Road / Enniskerry Road SHD

(Source: *Dún Laoghaire-Rathdown County Council*, Online Planning Database; ABP Ref. 306160-19)

2. ABP-303978-19 - Glenamuck Road SHD (203 No. Residential Units)

ABP Reference:	ABP-303978-19
Location:	Glenamuck Road South, Kiltarnan, Dublin 18
Application Date:	19 th March 2019
Development Description:	Permission for a strategic housing development consisting of 203 residential units within 12 No. blocks ranging in height from 3-6 No. storeys). The provision of a creche, a retail unit and a social/amenity facility. The development will include a new access from Glenamuck Road and the provision of access connection points, vehicular, cycle and pedestrian) to future adjacent development lands. www.glenamuckshd.ie
ABP Decision Date:	26 th June 2019
ABP Decision:	Grant Permission subject to 31 No. conditions

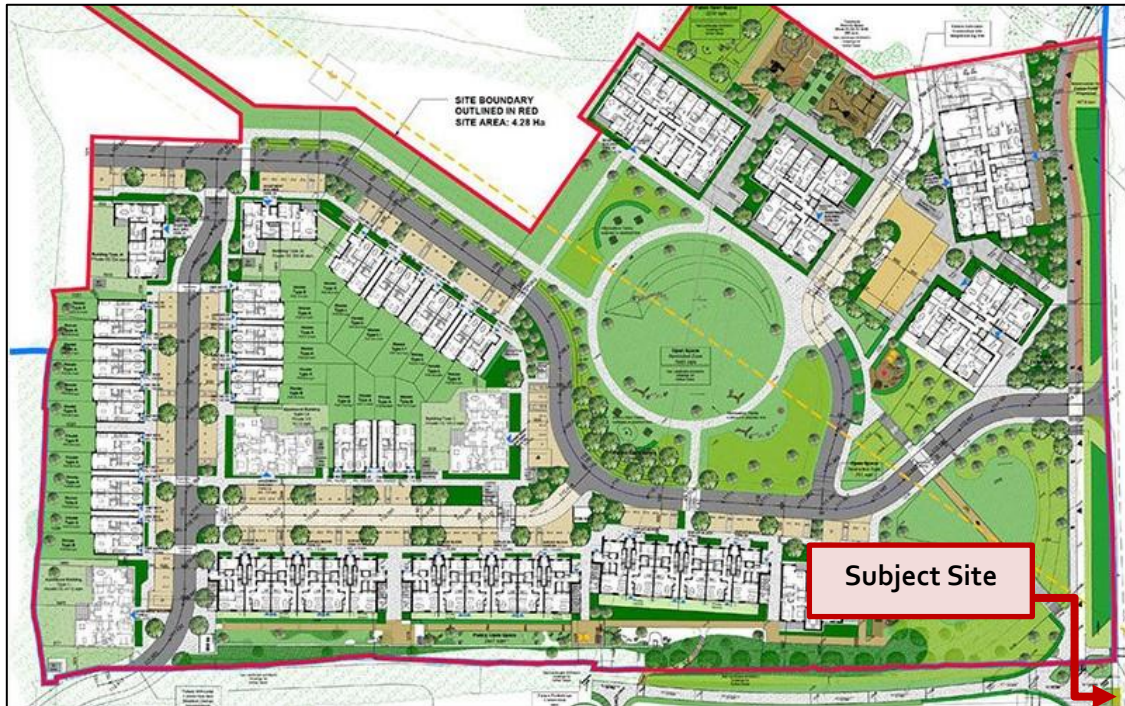


Figure 4.5: Site Layout of the Glenamuck SHD

(Source: *Dún Laoghaire-Rathdown County Council, Online Planning Database; ABP Ref. ABP-303978-19*)

3. ABP-312216-21 - Glenamuck Road South Amendment Application

ABP Reference:	ABP-312216-21
Location:	Glenamuck Road South, Kilternan, Dublin 18
Application Date:	14 th December 2021
Development Description:	Alteration to previously approved ABP-303978-19 for revision to unit types (the total number of units remain the same), removal of retail/coffee dock, provision of 1 No. additional substation and the increase in car and bicycle parking.
ABP Decision Date:	27 th April 2022
ABP Decision:	Decision Pending at time of writing

4. ABP-307506-20 - Shaldon Grange SHD (130 No. Residential Units)

ABP Reference:	ABP-307506-20
Location:	Shaldon Grange, Kilternan, Dublin 18
Application Date:	8 th July 2020
Development Description:	Permission for a phased strategic housing development to consist of the provision of 130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments, ranging from three to four storeys in height. Vehicular access to the site will be from Enniskerry Road. www.landsatshaldongrangeliltternanshd.com
ABP Decision Date:	22 nd October 2020
ABP Decision:	Refuse Permission

Planning permission was refused by An Bord Pleanála on 22nd October 2020 for the following reason:

'Having regard to the conclusion of the Planning Inspector and the planning authority that the proposed development is in material contravention of the Kiltiernan – Glenamuck Local Area Plan 2013 (2023) (in terms of its phasing plan, which allows for 700 No. units for Phase 1) and that the statutory requirements relating to public notices and a Material Contravention Statement had not been complied with by the applicant, the Board considers that it is precluded from and would not have jurisdiction to consider whether to grant permission in the absence of those statutory requirements being met.'

It is noted that permission was only refused because the Applicant failed to advertise that the proposed development contravened the phasing plan as opposed to the Board having any concern about the contravention of the phasing.

The application for a Strategic Housing Development at Shaldon Grange was relodged with An Bord Pleanála on the 15th December 2021, under ABP Ref. ABP-312214-21 (as detailed below).

5. ABP-312214-21- Shaldon Grange SHD (130 No. Residential Units)

ABP Reference:	ABP-312214-21
Location:	Shaldon Grange, Kiltiernan, Dublin 18
Application Date:	15 th December 2021
Development Description:	Permission for a strategic housing development to consist of the provision of 130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments , an associated site works. www.landsatshaldongrangeliltiernanshd.com
ABP Decision Date:	11 th April 2022
ABP Decision:	Grant Permission



Figure 4.6: Site Layout of Shaldon Grange Proposed Phase 1 SHD and CGI of Proposed Development

(Source: Extract from ABP Ref. ABP-312214-21 and www.landsatshaldongrangepkiltiernanshd.com)

The An Bord Pleanála Inspector noted the following in relation to phasing:

'In any event, it is evident that this quantum of development has not actually been constructed in the area since the adoption of the LAP. Some sites that have the benefit of an extant permission remain undeveloped, some are currently for sale. There is no certainty if or when sites that have the benefit of permission will be developed. Permission has been granted for the GDDRS and Enniskerry Road/Glenamuck Road Junction and construction works on these schemes appear imminent. Whilst, I agree that it would have been preferable for the upgrade works to the Enniskerry Road/Glenamuck Road Junction to have taken place prior to the construction/occupation of these units, I am of the view that a pragmatic approach must be taken to the consideration of the issue of phasing and the appropriateness of permitting the development in the absence of the fully implemented road scheme. Given this road infrastructure is likely to be implemented in a similar timeframe to the development of the site, I do not have issue with the granting of permission for the proposed units on this site. This would appear to be the view taken by the Board in other SHD applications in the area. If the Board is so minded, they may attached a condition

stipulating that none of the dwelling units be occupied until such time as the GDDRS is completed and operational. I note that Transport Infrastructure Ireland have not raised concerns in relation to this proposal. Based on the information before me in relation to timelines and expected delivery dates of road infrastructure, I do not consider that such a condition is necessary. Based on the information before me, I am satisfied that the proposed development can be accommodated on the existing road network until such time as the GDDRS is completed and operational.' [Our Emphasis]

6. ABP-307043-20- Suttons Fields SHD, Ballybetagh Road (116 No. Residential Units)

ABP Reference:	ABP-307043-20
Location:	Suttons Fields, Ballybetagh Road, Kiltarnan Village, Dublin 18.
Application Date:	9 th April 2020
Development Description:	Permission for a strategic housing development consisting of 116 dwellings and creche . The dwellings will comprise: 85 No. houses and 31 No. apartments . The buildings will range from 1-3 No. storeys in height . The development will include a Main Road on its west boundary, running from Ballybetagh Road to the north boundary, that will facilitate linkage to development lands to the north. Pedestrian and cycle access will be provided from Ballybetagh Road into the site, along the west boundary of Our Lady of the Wayside National School, connecting to the site circulation roadway in the vicinity of the childcare unit. www.suttonsfieldsshd.ie .
ABP Decision Date:	28 th August 2020
ABP Decision:	Grant Permission subject to 28 No. conditions

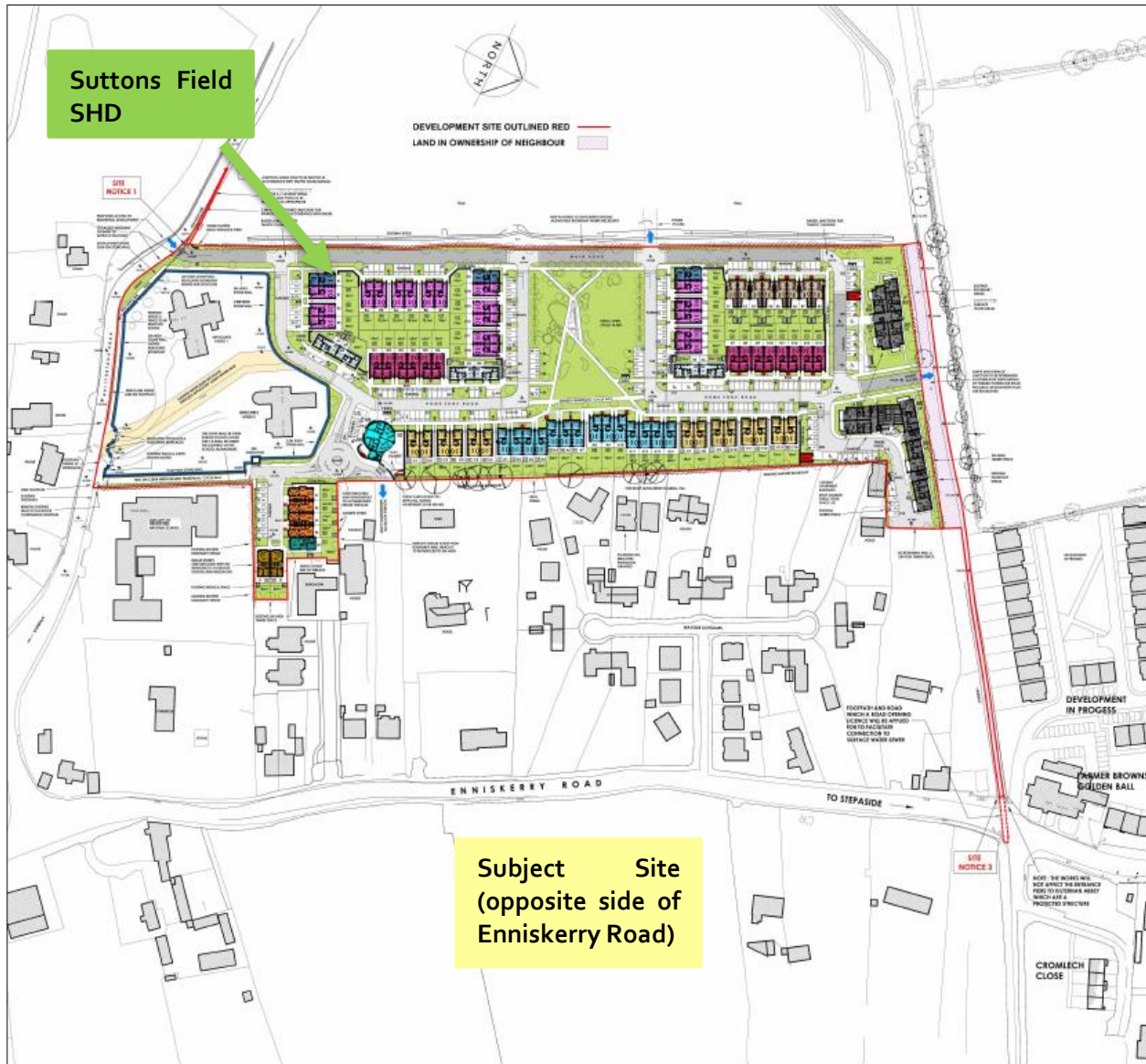


Figure 4.7: Site Layout of Suttons Field SHD (Subject Site Located to the East, on the Opposite Side of Enniskerry Road)

(Source: *Dún Laoghaire-Rathdown County Council, Online Planning Database; ABP Ref. ABP-307043-20*)

7. ABP-307043-20 – Enniskerry Road SHD, Adjoining Bishop’s Gate Housing Development (203 No. Residential Units)

ABP Reference:	ABP-309846-21
Location:	Enniskerry Road SHD, Adjoining Bishop’s Gate Housing Development
Application Date:	30 th March 2021
Development Description:	203 No. residential units (109 No. houses, 94 No. apartments) and a creche. The heights range from 2 to 3 No. storeys. Vehicular access serving the proposed development primarily via the existing junction off Enniskerry Road serving the Bishops Gate development. www.enniskerryroadshd.com
ABP Decision Date:	15 th July 2021
ABP Decision:	Grant Permission subject to 26 No. conditions



Figure 4.8: Site Layout of Enniskerry Road SHD

(Source: *Dún Laoghaire-Rathdown County Council, Online Planning Database; ABP Ref. ABP-309846-21*)

4.3 ABP-303945-19 - Glenamuck District Roads Scheme

The Glenamuck District Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18th December 2019 (ABP-303945-19) and is projected to begin construction in Q3/Q4 2022 and estimated to be completed by Q3/Q4 2024, as advised by email by Gerry D’Arcy (Dun Laoghaire -Rathdown County Council) on 25th May 2022.

From: D’Arcy Gerry <[redacted]>
Sent: Wednesday 25 May 2022 12:11
To: Foley, Peter <[redacted]>; John Carr - DBFL Consulting Engineers <[redacted]>
Cc: Neil Durkan <[redacted]>; Patricia Thornton <[redacted]>
Subject: RE: GDRS - current status

Hi Peter,

I am pleased to confirm the following relating to the GDRS :

The GDRS shall be delivered as one scheme under a single tender.
 The GDRS has all necessary statutory consents.
 The GDRS has funding for its delivery in place.
 DLRCC shall go to tender in Q2 or early Q3 2022.
 DLRCC expect to be on site Q3/Q4 2022.
 Construction Program estimated 18 -24 months
 Scheme Completed estimated Q3/Q4 2024.

Regards,
 Gerry.

The GDRS extent adjoining the site is shown in Figure 4.9 below, consists of the:

- *Glenamuck District Distributor Road (GDDR)*- consisting of c. 600 metres of two-way lane single carriageway from Enniskerry Road tie in to the GDDR/GLDR junction and c. 890 metres of four-lane dual carriageway from this junction to Golf Lane Roundabout, and
- *Glenamuck District Distributor Road (GLDR)*- consisting of c. 1.8 km of predominantly single lane carriageway road.



Figure 4.9: Overview of Permitted GDRS (Subject Developable Site Outlined Indicatively in Red).

(Source: Dún Laoghaire-Rathdown County Council, *Glenamuck District Road Scheme EIAR*, annotated by Thornton O'Connor Town Planning, 2022)

The proposed new distributor and link roads, with associated traffic management measures and site works (including attenuation ponds), would join the existing road network with new junction(s) to be formed with the R117 (Enniskerry Road), the R116 (Ballycorus Road), Barnaslignan Lane and the Glenamuck Road.

In the interests of current national, regional and local objectives, the delivery of sequential development is appropriate along the now approved and soon to be constructed GDRS. As well as accommodating the traffic volumes associated with the development of all the LAP lands, these roads will incorporate the provision of future bus service improvements as well as footpath and cycle track provision which will be linked to the proposed development site.

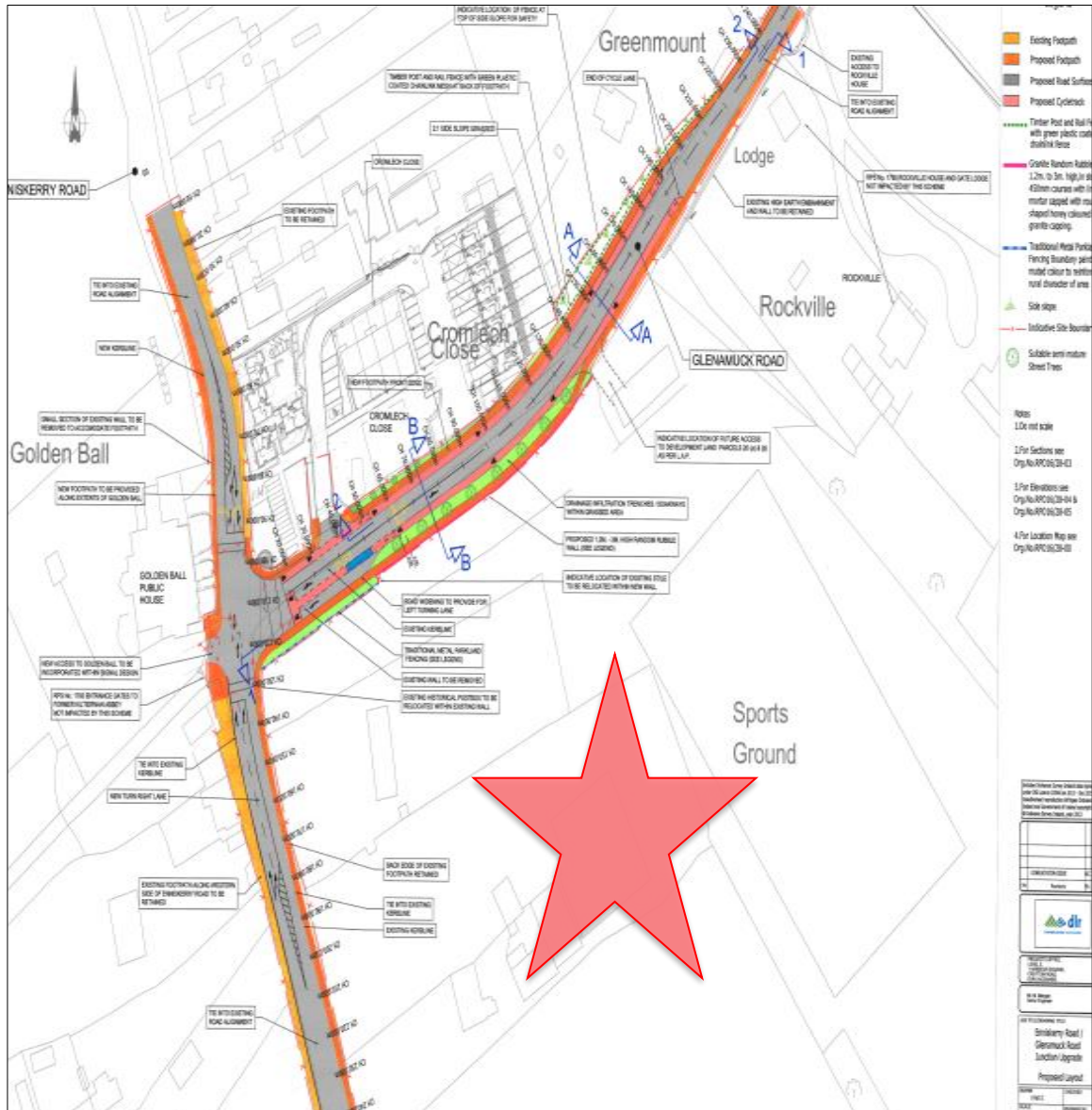


Figure 4.10: Overview of Permitted Part 8 (Subject Site Indicatively Denoted by the Red Star)

(Source: Dún Laoghaire-Rathdown County Council, *Glenamuck District Road Scheme EIAR*, annotated by Thornton O'Connor Town Planning, 2022)

4.4 PC/1C/01/21 - DLRCC Part 8 Application for a Public Park and Recreational Facilities on lands adjacent to Glenamuck South

Dun Laoghaire-Rathdown County Council is proposing to develop a public garden and recreational facilities comprising a children’s play area, ‘kickabout’ area, water feature, footpaths, bench seating, tree planting, and ancillary works at Glenamuck Road South between ‘Rockville’ and the proposed ‘Glenamuck Link Distributor Road’. Dun Laoghaire-Rathdown Infrastructure & Climate Change Department received Part 8 planning approval (with amendments) at the Council Meeting on 14th June 2021³.

³ <https://dlrcoco.citizenspace.com/infrastructure-climate-change/glenamuck-park/>

This proposal for a public park is located at a site c. 350 metres away from the proposed Glenamuck Road entrance to the subject SHD development proposal.



Figure 4.11: Proposed Development of Public Park and Playground at the Junction between Glenamuck Road South and the permitted Glenamuck Link Distributor Road (GLDR)

(Source: Cunnane Stratton Reynolds Land Planning & Design and DLRCC, 2021)

Figure 4.12 below demonstrates the location of this new park (annotated as “Glenamuck Park”) to the north of the subject lands:

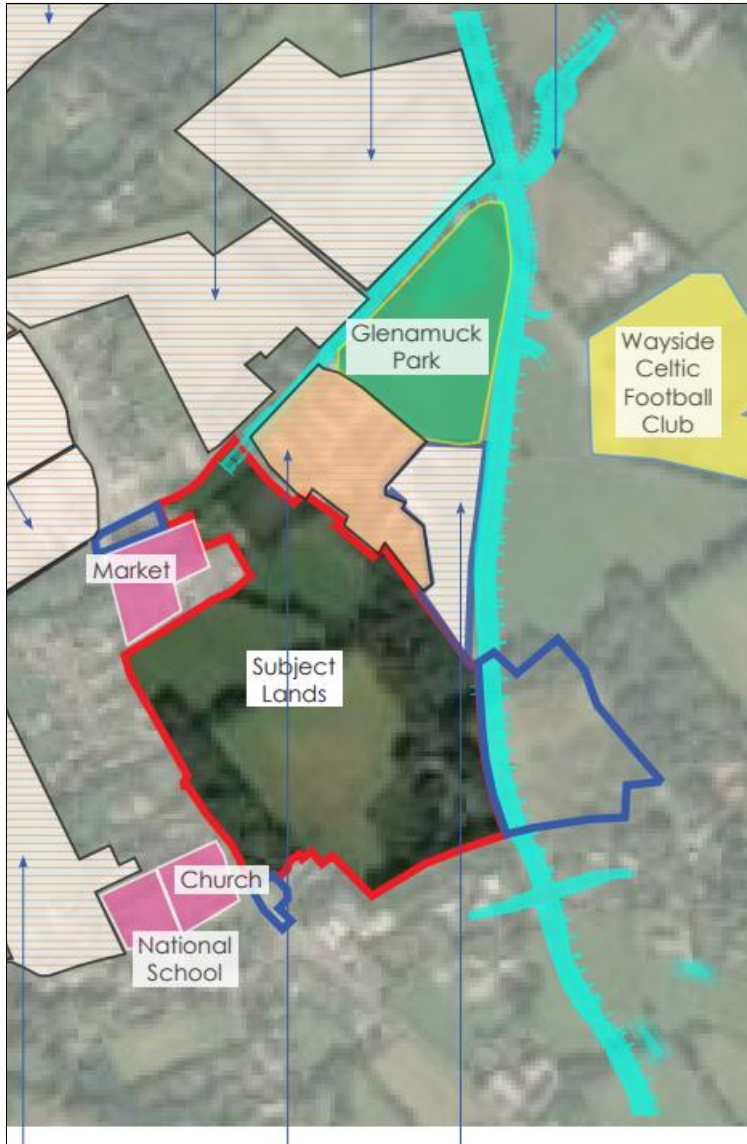


Figure 4.12: Image Extracted from the Landscape Rationale Enclosed Demonstrating Location of this New Park to the North of the Subject Lands

(Source: Landscape Rationale, Ronan MacDiarmada & Associates Landscape Architects & Consultants, 2022)

4.5 Summary of the Surrounding Development Context

The surrounding planning applications demonstrate an evolving urban context which has been supported by the planned creation of the Kiltiernan Village Centre, and has involved the transition from detached houses to higher density schemes, which also provide for a range of housing types. This can be attributed to the proposed development of the GDRS, which allows for higher density residential and mixed-residential units in the Kiltiernan and Glenamuck area.

It is our opinion that the development subject to this application will provide high quality residential units and a vibrant Neighbourhood Centre to serve the Kiltiernan area on an underutilised site.

5.0 DESCRIPTION OF PROPOSED DEVELOPMENT

5.1 Description of Development

Liscove Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 10.8 Ha site at lands at Wayside, Enniskerry Road and Glenamuck Road, Kiltiernan, Dublin 18, which include a derelict dwelling known as 'Rockville' and associated derelict outbuildings, Enniskerry Road, Kiltiernan, Dublin 18, D18 Y199. The site is generally bounded by the Glenamuck Road to the north; Kiltiernan Country Market and the Sancta Maria property to the north and west; a recently constructed residential development named "Rockville" to the north-east; the Enniskerry Road to the south-west; dwellings to the south; and lands that will facilitate the future Glenamuck Link Distributor Road to the east.

Road works are also proposed to facilitate access to the development from the Enniskerry Road; to the approved Part 8 Enniskerry Road/Glenamuck Road Junction Upgrade Scheme on Glenamuck Road (DLRCC Part 8 Ref PC/IC/01/17); and to the approved Glenamuck District Roads Scheme (GDRS) (ABP Ref:HA06D.303945) on the Glenamuck Link Distributor Road (GLDR). Drainage and water works are also proposed to connect to services on the Glenamuck Road and Enniskerry Road.

At the Glenamuck Road access point, this will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table and the changing of the cycle track to a cycle lane at road level as the cycle facility passes the side road junction. Surface water and foul drainage infrastructure is proposed towards the north of the site into the drainage infrastructure to be constructed as part of the Part 8 scheme. Potable water is to be provided from the existing piped infrastructure adjacent to the site along Glenamuck Road. These interfacing works are proposed on an area measuring c. 0.05 Ha.

At the GLDR access point, this will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of short section of shared path and an uncontrolled shared pedestrian and cyclist crossing across the side road junction on a raised table. The works will also include the provision of a toucan crossing, inclusive of the necessary traffic signal equipment, immediately south of the access point to facilitate pedestrian and cyclist movement across the mainline road. All works at the GLDR access point will include the provision of the necessary tactile paving layouts and are provided on an area measuring c. 0.06 Ha.

At the Enniskerry Road, works are proposed to facilitate 3 No. new accesses for the development along with modifications to Enniskerry Road. The 3 No. side road priority access junctions incorporate the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table. The modifications to Enniskerry Road fronting the development (circa 320 metres) includes the narrowing of the carriageway down to 6.5 metres (i.e. a 3.25 metres running lane in each direction) from the front of the kerb on western side of Enniskerry Road. The remaining former carriageway, which varies in width of c. 2 metres, will be reallocated for other road users and will include the introduction of a widened pedestrian footpath and landscaped buffer on the eastern side of the road adjoining the proposed development. The above works are inclusive of all necessary tie-in works such as new kerb along eastern side of Enniskerry Road, drainage details, road marking, signage and public lighting. Potable water is to be provided from the existing piped infrastructure adjacent to the site along the Enniskerry Road. The interface works on Enniskerry Road measures c. 0.19 Ha.

Surface water and foul drainage infrastructure is proposed to connect into and through the existing/permitted Rockville developments (DLR Reg. Refs. D17A/0793, D18A/0566 and D20A/0015) on a total area measuring c. 0.09 ha. The development site area and drainage and roads works areas will provide a total application site area of c. 11.2 Ha.

The development will principally consist of: the demolition of c. 573.2 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings; and the provision of a mixed use development consisting of 383 No. residential units (165 No. houses, 118 No. duplex units and 100 No. apartments) and a Neighbourhood Centre, which will provide a creche (439 sq m), office (317 sq m), medical (147 sq m), retail (857 sq m), convenience retail (431 sq m) and a community facility (321 sq m). The 383 No. residential units will consist of 27 No. 1 bedroom units (19 No. apartments and 8 No. duplexes), 128 No. 2 bedroom units (78 No. apartments and 50 No. duplexes), 171 No. 3 bedroom units (108 No. houses, 3 No. apartments and 60 No. duplexes) and 57 No. 4 bedroom units (57 No. houses). The proposed development will range in height from 2 No. to 5 No. storeys (including podium/undercroft level in Apartment Blocks C and D and in the Neighbourhood Centre).

The development also provides: pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" development to the north-east and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road; 678 No. car parking spaces (110 No. in the undercroft of Blocks C and D and the Neighbourhood Centre and 568 No. at surface level) including 16 No. mobility impaired spaces, 73 No. electric vehicle spaces, 1 No. car share space, 4 No. drop-off spaces/loading bays; motorcycle parking; bicycle parking; bin storage; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level of the Neighbourhood Centre including shrouds, antennas and microwave link dishes (18 No. antennas and 6 No. transmission dishes, all enclosed in 9 No. shrouds together with all associated equipment); private balconies, terraces and gardens; hard and soft landscaping; sedum roofs; solar panels; boundary treatments; lighting; substations; plant; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 43,120 sq m in addition to undercroft levels (under Apartment Blocks C and D measuring c. 1,347 sq m and under the Neighbourhood Centre measuring c. 2,183 sq m, which includes parking spaces, external storage, bin storage, bike storage and plant).



Figure 5.1: Proposed Site Layout Plan for the Subject Development

(Source: **MCORM Architects, 2022**)

The total red line application site boundary is c. 11.2 Ha (c. 111,532 sq m) and is broken down as follows:

1. The developable site of c. 10.8 Ha (c. 107,625 sq m);
2. Road and drainage works on Glenamuck Road: c. 0.05 Ha (c. 535 sq m);
3. Roadworks at the Glenamuck Link Distributor Road (GLDR) access point: c. 0.06 Ha (c. 550 sq m);
4. Road and drainage works on Enniskerry Road: c. 0.19 Ha (c. 1,879 sq m); and
5. Drainage works connecting into and through the existing Rockville development: c. 0.09 Ha (c. 943 sq m).

The lands to the east of the application lands will be developed in the future when the GLDR is constructed, as the GLDR will 'split' the application lands from these lands further east. In relation to the portion of lands to the north-west, it is considered that this piece of land is too narrow to provide an appropriate design response at this important junction in the centre of Kiltiernan Village. The land would be more appropriately designed in tandem with the lands to the south (Kiltiernan Country Market) should they become available in the future.

5.2 Key Site Statistics

Total Red line Site Area:	c. 11.2 Ha
Gross Site Area / Developable Site Area (excluding external drainage/road works):	c. 10.8 Ha
Net Site Area:	c. 8.6 Ha
Existing Floor Space (to be demolished):	c. 573.2 sq m
Gross Floor Space:	c. 43,120 sq m
Net Density:	44.5 units per Ha
Gross Density:	35.5 units per Ha
Dual Aspect Units:	All houses within the scheme will be dual aspect, 95% of the duplexes will be dual aspect (112 No. of 118 No. duplexes) and 69% of the apartments will be dual aspect (69 No. of 100 No. apartments)
Public Open Space:	18,879 sq m
Communal Open Space:	2,934 sq m
Number of Residential Units:	383 No. units
Non-residential floor space (Neighbourhood Centre and fronting Village Green)	2,512 sq m as follows: <ul style="list-style-type: none"> ○ Creche (439 sq m) ○ Office (317 sq m) ○ Medical (147 sq m) ○ Retail (857 sq m) ○ Retail (convenience) (431 sq m) ○ Community facility (321 sq m)
Height:	2 – 5 No. storeys
Car Parking:	678 No. spaces including: <ul style="list-style-type: none"> 73 No. electric vehicle spaces; 16 No. disabled spaces; 3 No. parent and child spaces; and 1 No. car share space.
Bicycle Parking:	536 No. spaces
Motorcycle Parking:	12 No. spaces

5.3 Derelict Buildings to be Demolished

The proposed development includes the demolition of c. 573.2 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings. As shown in the images below, the derelict dwelling and outbuildings are in bad condition and in our opinion, do not possess architectural merit and require demolition in order to provide a high-quality scheme in the heart of Kiltarnan.



Figure 5.2: Extracts from MCORM Architects Dwg No. PL106 Demonstrating the Poor Condition of the Derelict Buildings on Site

(Source: MCORM Architects, 2022)

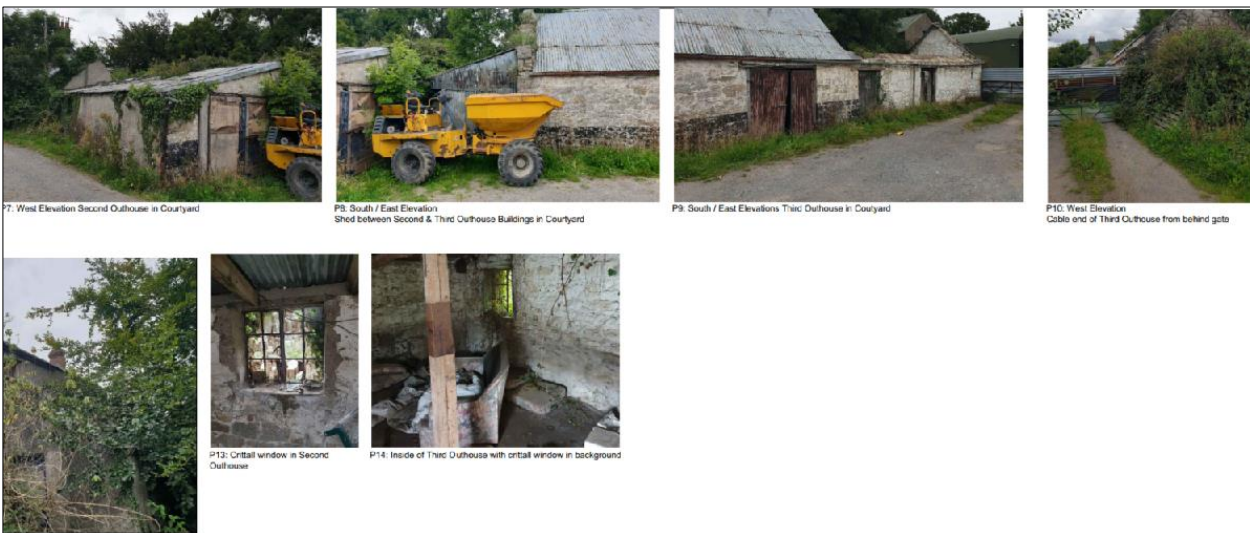


Figure 5.3: Extracts from MCORM Architects Dwg No. PL106 Demonstrating the Poor Condition of the Derelict Buildings on Site

(Source: MCORM Architects, 2022)



Figure 5.4: View of a Portion of the Derelict Buildings (Rockville dwelling) from Enniskerry Road with Dwelling Providing a Blank Gable onto Enniskerry Road

(Source: Google Streetview, 2022)

5.4 Residential Unit Mix

Unit Types	Apartment	Duplex	House	Total	Unit Mix
1 Bed	19	8	-	27	7%
2 Bed	78	50	-	128	33%
3 Bed	3	60	108	171	45%
4 Bed	-	-	57	57	15%
Total	100	118	165	383	100%

The duplexes, houses and apartments are provided throughout the scheme, predominately ranging in height from 2 to 3 No. storeys. There are 2 No. apartment blocks proposed in the north-eastern portion of land fronting onto Glenamuck Road and which aligns with the general location of the permitted higher building in the adjoining Rockville development. In addition, there are some duplex units within the Neighbourhood Centre.

The residential units will be developed on a phased basis as follows:

Phase	Units	Months	Start Month	Completion
Phase 1	91	18	Apr-23	Sep-24
Phase 2	73	24	Apr-24	Mar-26
Phase 2a (Neighbourhood Centre)	53			
Phase 3	59	12	Aug-25	Jul-26
Phase 4	97	18	Feb-26	Apr-28
Phase 5 (Retail & Community)	10	8	Sep-27	Apr-28
Total	383	80		

Total Build Period 5.0 Years

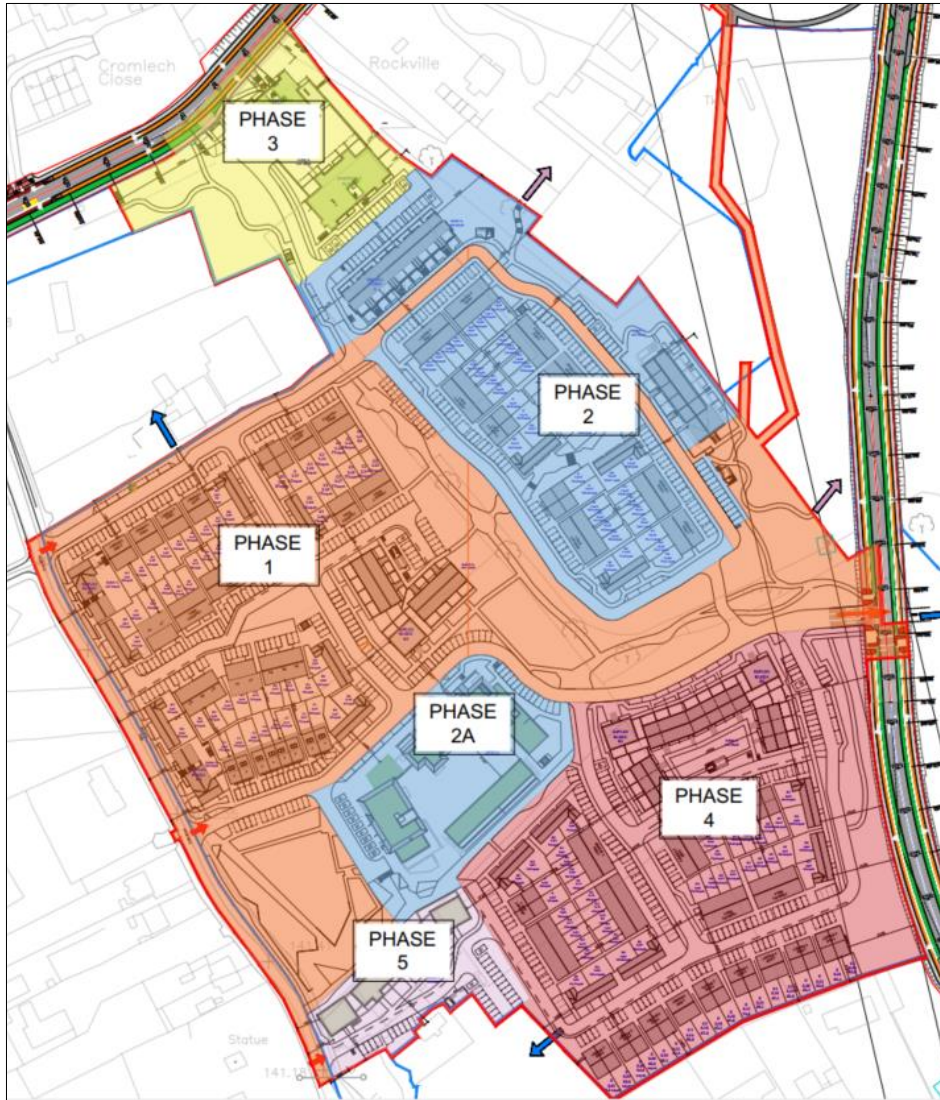


Figure 5.5: Phasing Plan for the Proposed Development

(Source: MCORM Architects Dwg. PL105, 2022)



Figure 5.6: Computer Generated Images of Proposed Residential Elements of the Scheme

(Source: 3D Design Bureau, 2022)

5.5 Neighbourhood Centre

The Neighbourhood Centre will provide a new community hub in the heart of Kiltiernan Village, due to its location facing onto Village Green which fronts onto Enniskerry Road. A new Village Green will be provided to the front of the Neighbourhood Centre, which will animate the streetscape along Enniskerry Road and will improve and enhance legibility and permeability for the area. The Neighbourhood Centre will comprise the following commercial elements (in addition to residential units):

Use	Sq m
Retail	857 sq m
Retail (Convenience)	431 sq m
Crèche	439 sq m
Office	317 sq m
Medical	147 sq m
Community Facility	321 sq m
Total	2,512 sq m

(It is noted that the quantum of commercial floor area proposed is less than the maximum allowable under the SHD process, with a maximum of 4,500 sq m permitted in the context of the quantum of residential units proposed in the proposed development).

The new Neighbourhood Centre will become the focal point for the village and will significantly enhance the amenity provision for the local community.



Figure 5.7: Computer Generated Image of the Proposed Neighbourhood Centre and Village Green as Viewed from Enniskerry Road

(Source: 3D Design Bureau, 2022)

5.6 Height and Massing

The subject development predominately ranges in height from 2 to 5 No. storeys with the 5 No. storey apartment blocks fronting Glenamuck Road and the 4 No. storey Neighbourhood Centre fronting the Village Green (opening onto the Enniskerry Road). It is our professional planning opinion that the proposed heights can be easily absorbed without any undue impact on the character of the area or the amenity of neighbouring properties. We note that there is a 4 No. storey apartment block in the neighbouring Rockville development to the north-east, which is located on the boundary of the Applicant's lands. In our opinion, the heights provided in the subject development are appropriate having regard to the express requirement in National level policy to achieve compact growth, in addition to the careful modulation of height throughout the site.

A Material Contravention Statement has been prepared by Thornton O'Connor Town Planning, which provides a justification for the provision for two 5 No. storey apartment blocks to the north of the site fronting the Glenamuck Road having regard to the *Kiltarnan LAP*, which prescribes heights of 2-4 No. storeys for the subject site. These apartment blocks only slightly exceed the *Kiltarnan LAP* standards. Having regard to the high-quality architectural composition of the scheme and the site's receiving context (with an existing 4 No. storey apartment block in the Rockville development to the east directly abounding the site boundary), it is considered that the proposed heights can be absorbed at the subject site.

The *National Planning Framework* ("NPF") and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018* ("*Building Height Guidelines*"), both encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl.

5.7 Pedestrian and Vehicular Access Points

The development proposes vehicular access from Enniskerry Road and Glenamuck Road, vehicular access to the future Glenamuck Link Distributor Road (GLDR), pedestrian links from Enniskerry Road and Glenamuck Road and within the site to the neighbouring "Rockville" development to the north-east and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future GLDR, which is soon to be constructed.

A key objective of the scheme is to reduce car dependency by providing high quality pedestrian and cycle networks. The enhancement and provision of permeable connections through the site, in particular the Dingle Way, will make a positive contribution to the Village.

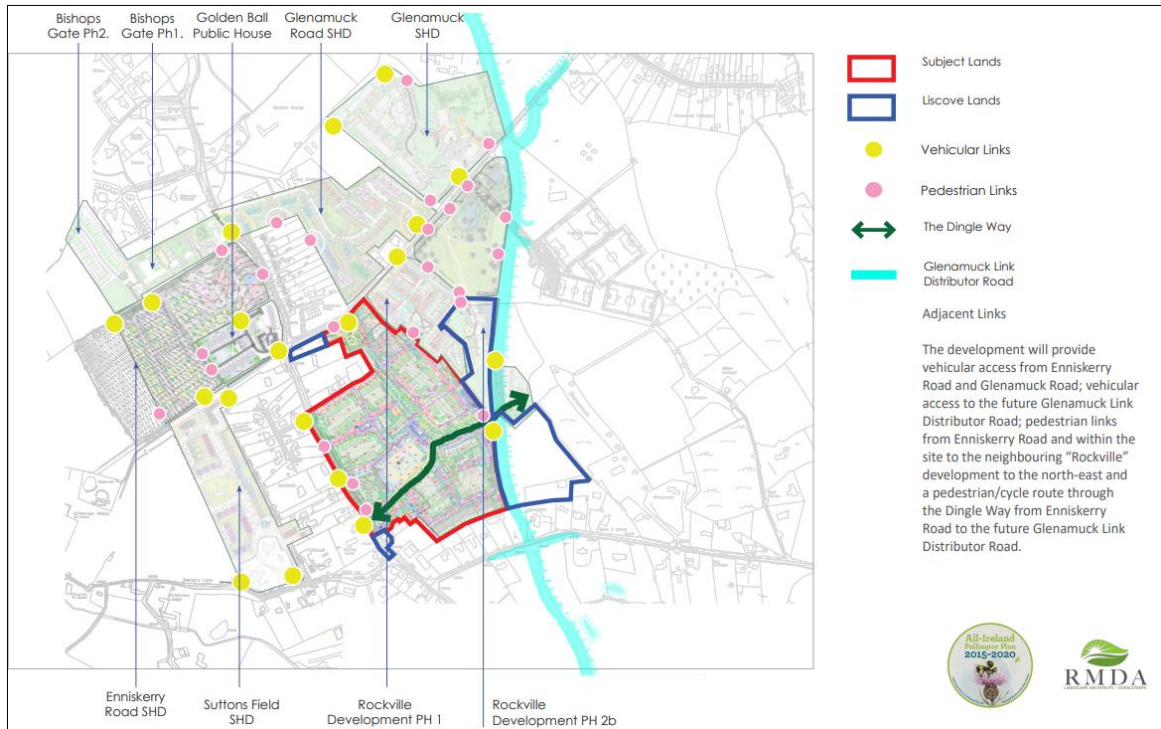


Figure 5.8: Proposed Dingle Way and Pedestrian Connectivity for the Subject Site

(Source: RMDA Landscape Architects, 2022)

The increased permeability of the development to its surrounding context is important to connect residents to surrounding opportunities. The street network for the proposed development aims to provide a permeable street layout that emphasises pedestrian priority and clearly defined street typologies.

The development proposes 5 No. vehicular access locations to the site as follows: 1 No. access road is located along the future Glenamuck Link Distributor Road (GLDR), 3 No. accesses along the Enniskerry Road and the final access will be provided off Glenamuck Road to the north.

5.8 Landscaping and Open Spaces

A range of high-quality public and communal open spaces have been proposed to cater for the recreational and amenity requirements of future residents and for the wider community through the provision of a Village Green on the subject lands, amongst other spaces. The open spaces have been developed with proposed extensive path systems that are organic in style. Native woodland tree planting has been proposed with native transplants and a wildflower meadow mix to help create a natural habitat area. The scheme includes 18,879 sq m of public open space and 2,934 sqm of communal open space. In addition, the Dingle Way is an important public amenity and this provides an extra 1,572 sq m of public open space.

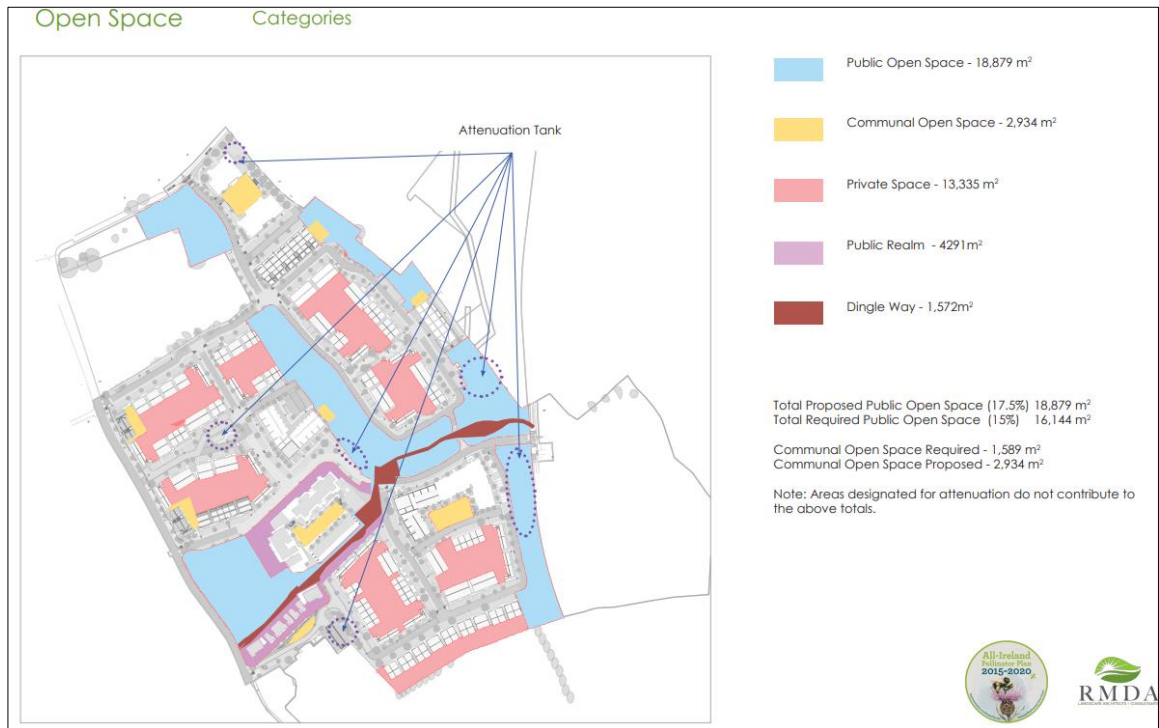


Figure 5.9: Open Space Categories for the Proposed Development

(Source: RMDA Landscape Architects, 2022)

The key landscaped spaces / meeting points for the scheme are shown below:

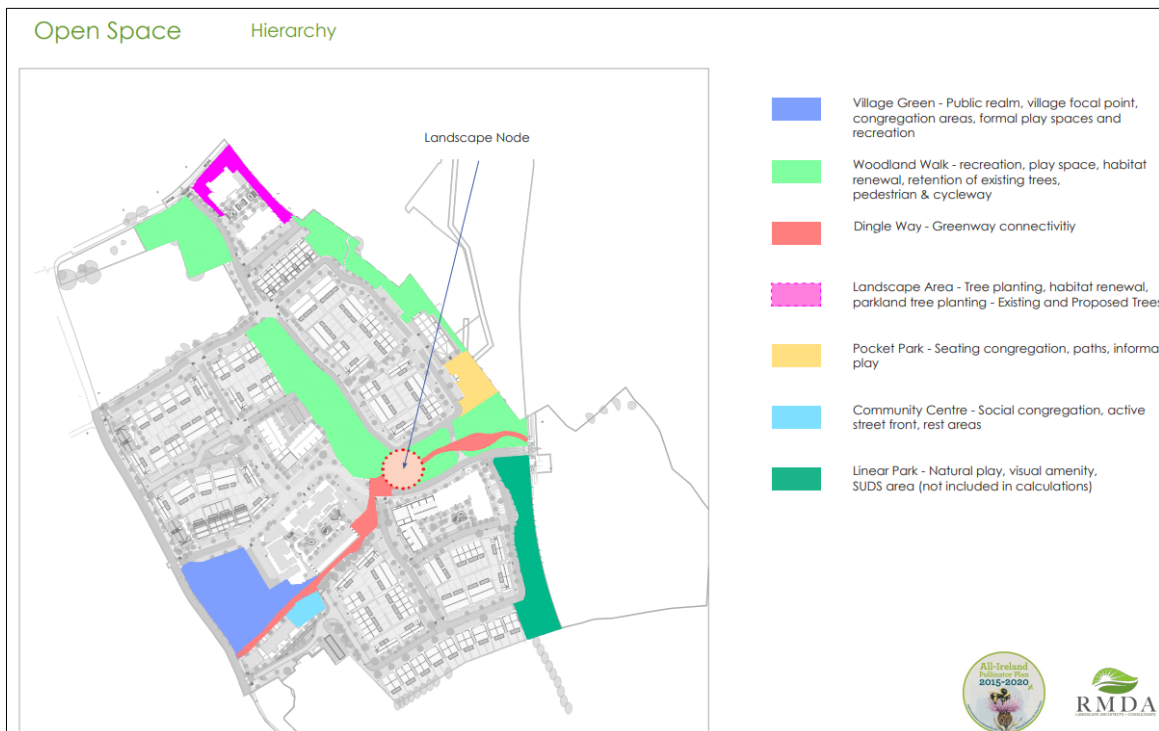


Figure 5.10: Open Space Hierarchy for the Proposed Development

(Source: RMDA Landscape Architects, 2022)

Figure 5.11 below illustrates the landscaping masterplan for the development site.



(Source: RMDA Landscape Architects, 2022)

The play spaces and exercise equipment will be provided as shown in the image below extracted from the Landscape Rationale:



Figure 5.12: Proposed Play Space and Exercise Equipment

(Source: RMDA Landscape Architects, 2022)

Please refer to the Landscape Drawings and Rationale for further details on landscaping and public and communal open space provision for the subject development.

5.9 Proposed Character Areas Within the Scheme

The subject scheme will comprise 4 No. character areas which are shown on Dwg No. PL602, prepared by MCORM Architects, and extracted below. The *Design Statement* by MCORM Architects states the following:

'Four distinctive character areas are proposed across the scheme, grouping the cells bounding the central landscaped spine in the north west in character area 1, the traditional housing cells to the south-east and units fronting the Enniskerry road and wrapping around to front onto the village green in character area 2. The northern-eastern portion adjacent to Glenamuck Road and Rockville development in character area 3 and the Neighbourhood Centre and Duplex Block D1 in character area 4. These precincts are defined by differences in building design and finishes /materials and naturally subdivided by the retention of existing site features/ landscaping, therefore integrating and enhancing natural assets within the overall urban design of the scheme.'



Figure 5.13: Proposed Character Areas

(Source: **MCORM Architects Dwg No. PL602, 2022**)

The following description of each Character Area has been extracted from the Design Statement:

Character Area 1

Character Area 1 located in the north-western part of the site facing the central green spine that runs from north to south and adjoining the existing village features, namely the existing village market to the north-west.

The buildings proposed include a mix of 3-storey duplex blocks and 2 storey houses. This character area will benefit from the retained tree line which incorporates play spaces and walking paths along its eastern edge as well as a pocket park in the centre of this character area. Primary access to this character area is from the Enniskerry Road connecting secondary and shared-surface streets, which prioritise pedestrian/cycling journeys and will therefore boost vehicle free movement from inner locations to the bounding landscaped network of public open spaces.

The typological diversity proposed will be unified by sharing the same brick type, buff mystique or similar. Houses will also present render walls and stone or render expressed bands around external openings and lintels.

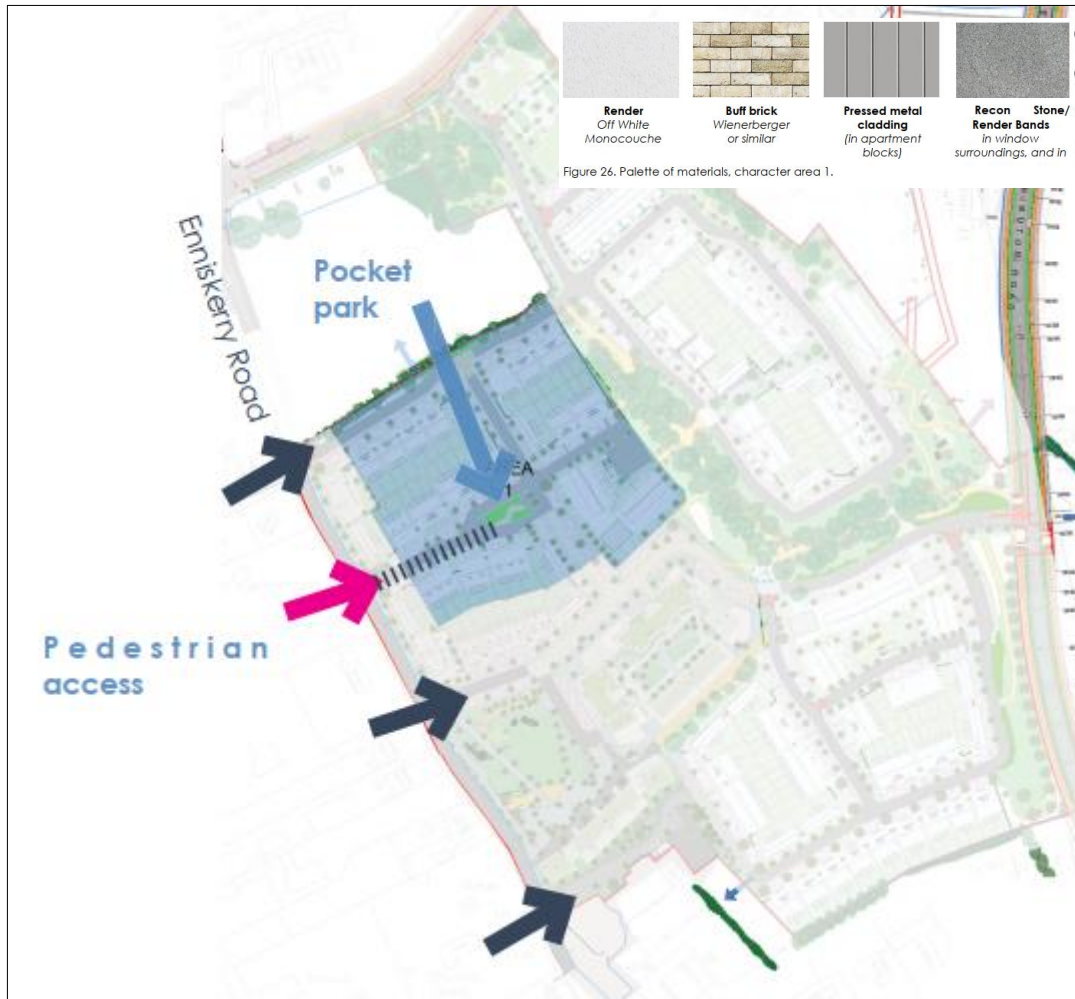


Figure 5.14: Proposed Character Area No. 1

(Source: MCORM Architects Design Statement, 2022)

Character Area 2

Character Area 2 is located in the south-eastern portion of the subject site, backing onto the existing lowrise houses located in the south, the landscaped buffer designed along the planned GLDR to the east and fronting onto the Enniskerry Road and Village Green. This character area is also continued adjacent to the Enniskerry Road, which will be downgraded and traffic-calmed after the delivery of the GLDR, along the south-western edge of the scheme and the units that flank the village green.

Due to its proximity to the existing rural pattern of low-rise houses in the south, the urban structure proposed for this zone consists of traditional housing cells generally. The scale of the houses proposed along the southern boundary of the scheme addresses appropriately the scale of the existing lands behind, which are accessed off the Ballycorus Road. Taller 3 No. storey duplex elements are strategically located in the north-western area of the cell, which faces the Dingle Way and builds up the scale along the main entrance of the scheme, from the GLDR. This provides high legibility and easy way-finding along the Dingle Way, linear park and link street, which are the most prominent public realm features of character area 2. In addition, wide-frontage houses are located in the two efficient housing cells facing the Dingle Way, home zone opposite and central section of the GLDR landscaped buffer at the western edge of the scheme.

This character area treatment is also utilised along the houses and units that face the Enniskerry Road and the houses that flank the Village Green to the north-west adding to the diverse material palette employed within the scheme when viewed from the Enniskerry Road.

Both houses and duplex blocks will be built in red brick, as indicated in the palette of materials above, combined with rendered walls, as indicated in architectural drawings for the different unit types. Stone render will be used for expressive bands surrounding openings and lintels. The traditional style of houses and linear duplex blocks will be broken by feature duplex buildings at prominent corners to provide a more contemporary character and reinforce the legibility strategy.



Figure 5.15: Proposed Character Area No. 2

(Source: MCORM Architects Design Statement, 2022)

Character Area 3

Character Area 3 comprises the lands located to the north-east of the site, backing onto the recent residential developments at Glenamuck Road and Rockville. The northern boundary of this area fronts on to Glenamuck Road and vehicular and pedestrian access is proposed along this frontage.

It will be accessible also from Enniskerry Road, through the link street proposed adjacent to the northern boundary of character area 1 and from the Glenamuck road from the north.

The housing cells will be bounded by a continuous linear park together with the Dingle Way at the south-eastern and western edges of this character area. In the northern portion, it will allow for pedestrian and cycling permeability towards a pocket park consisting of retained existing trees, adjacent to Glenamuck road, at the northern access point of the scheme. Landscaped buffers of retained existing trees are also proposed along the boundary with Rockville. This

overall system of open spaces will be fully overlooked by housing frontages and dual aspect units in the apartment blocks.

Buff brick will be used throughout, combined with rendered walls and stone or render expressed bands around external openings and lintels. Pressed metal cladding will also be introduced in penthouse façades of the 5 No. storey apartments designed in a contemporary style, opportunely contrasting with surrounding traditional houses and duplex linear blocks. The envisioned built environment will be well integrated within existing and proposed landscaping, including the retention of existing trees and hedgerows in the central green spine, northern pocket park adjacent to the Glenamuck Road and eastern boundary adjacent Rockville.



Figure 5.16: Proposed Character Area No. 3

(Source: **MCORM Architects Design Statement, 2022**)

Character Area 4

Character Area 4 is adjacent to the Enniskerry Road, which will be downgraded and traffic-calmed after the delivery of the GLDR. It comprises the heart of the scheme formed by a mixed use Neighbourhood Centre (NC), duplex block D1, and a public park - the village green. The Village Green will mark the new urban central core of Kiltarnan. The envisaged Village Green will be connected with the Dingle Way, an existing green link enhanced by the scheme that traverses this character area from west to east as indicated in the key plan in the right.

The buildings proposed include a mix of 3 No. storey duplex blocks and the Neighbourhood Centre, consisting of two 4 No. storey apartment buildings, with a mix of commercial at ground/first floor and a 3 No. storey duplex blocks facing the Dingle Way. This mix of typologies creates diversity in this character area.

Two entrances from Enniskerry Road will give access to this character area. The central entrance to the scheme will connect through to the GLDR on the eastern side of the subject site. Link streets will distribute traffic to calmed "home zones", which are designed for pedestrian priority and secondary streets. In addition, the central link street will include a raised-table section along the Neighbourhood Centre's north-western frontage to create a pedestrian friendly area integrating the Village Green with the northern portion of the site. The second entrance to this character area is a 'homezone', again giving pedestrian priority at this location and employing a traffic calming strategy on entry to the site. The Dingle Way runs past the eastern side of the Neighbourhood Centre block and continues in front of duplex block D1. A central plaza space connects the retail and community facilities which populate ground floor spaces of Duplex block D1 with the crèche, retail, medical and office uses on the ground floor of the neighbourhood centre creating a safe and usable space for residents and the surrounding community of Kilternan.

The typological diversity proposed will be unified by sharing the same brick type, *buff mystique and casa lena* or similar. The Neighbourhood Centre will have a traditional form to create the village character desired in the LAP, with a more contemporary style applied to the duplex block D1. A similar strategy will be applied to the ground floor commercial units of both the Neighbourhood Centre and Duplex block D1 in terms of the use of stone, external openings and signage for an overall cohesive architectural language to the commercial elements of the character area. The 2-4 No. storey neighbourhood centre will be described as a singular element of the scheme.

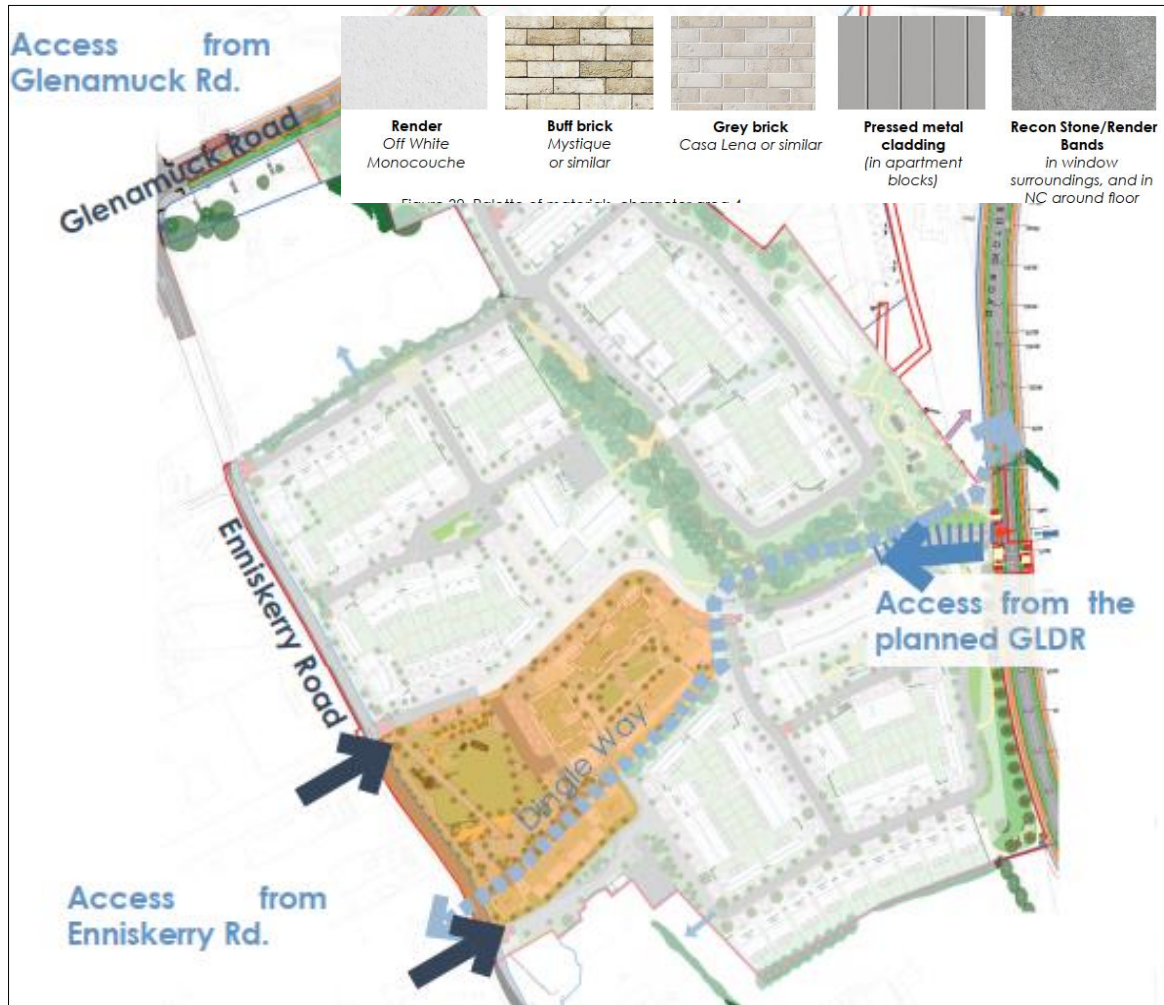


Figure 5.17: Proposed Character Area No. 4

(Source: MCORM Architects Design Statement, 2022)

6.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Housing for All– a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2020);*
7. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
8. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009);*
9. *Retail Planning Guidelines for Planning Authorities (2012);*
10. *Design Manual for Urban Roads and Streets (2019);*
11. *The Planning System and Flood Risk Management (2009); and*
12. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016.*

6.1 **Project Ireland 2040 – The National Development Plan 2021-2030**

The *National Development Plan 2021 – 2030*, (“NDP”) document was published in 2021 as an updated version of the previous *National Development Plan 2018 – 2027*.

As part of *Project Ireland 2040* the *NDP* sets out the Government’s over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the significant demand for public investment across all sectors and regions of Ireland with a major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.

The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All– a New Housing Plan for Ireland, September 2021* (“*Housing for All*”) and will enable a step-change in investment to ameliorate the

effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework* ("*NPF*").

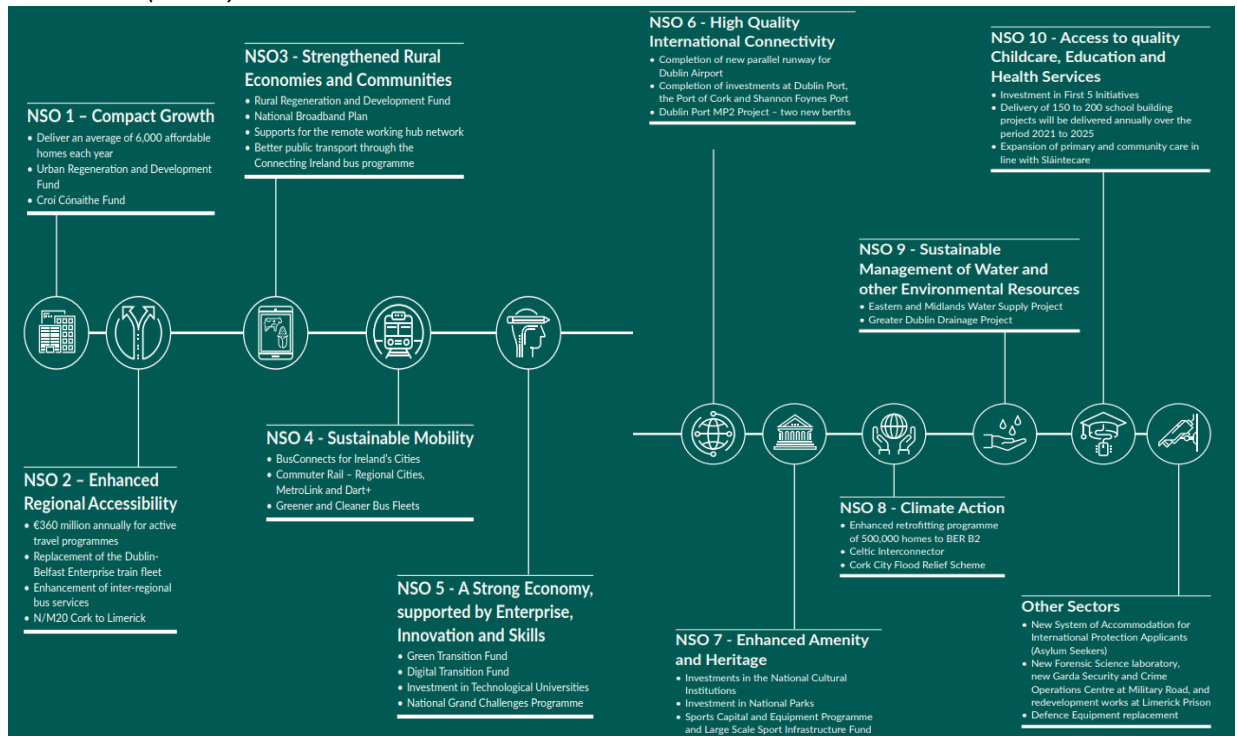


Figure 6.1: Major Investments – National Strategic Outcomes

(Source: *National Development Plan 2021-2030*)

The *NPF* has 10 No. National Strategic Outcomes, which are referenced in the *NDP*. The relevant strategic outcomes and objectives are discussed below at Section 6.2 of this report.

6.2 Project Ireland 2040: National Planning Framework

6.2.1 Introduction

Project Ireland 2040: National Planning Framework ("*NPF*") is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. The *NPF* is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

As set out in Section 6.6 of the *NPF*, a core principle of the *NPF* is to:

'Allow for choice in housing location, type, tenure and accommodation in responding to need', in addition to tailoring 'the scale and nature of future housing provision to the size and type of settlement where it is planned to be located'.

Therefore, we submit that the provision of 383 No. high-quality residential units, comprising a mix of 1, 2 3 and 4 No. bedroom units ranging from apartments to duplexes to houses, and Neighbourhood Centre at the subject site will contribute to achieving this core principle of the *NPF*.

Section 6.6 of the *NPF* states that:

'while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments.'

The *NPF* further calculates at Section 6.6 that:

*'Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, **with increasing demand to cater for one and two-person households.**'* [Our Emphasis]

Furthermore, it is noted that *'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'*

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'*. The policy document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it'*. [Our Emphasis]

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides a mix of dwelling unit types (apartments, duplexes and houses) ranging in size from 1 No. to 4 No. bedroom units, in addition to a Neighbourhood Centre, that will meet the needs of the future residents and the wider public.

By providing a broadly similar percentage of 1 and 2 No. bedroom units and 3 and 4 No. bedroom units, and a broadly similar percentage of apartments, duplex and houses, the scheme will cater for all household sizes and types, creating a sustainable community from first-time buyers to family houses to people trading down in the area.

Section 2.2 of the *NPF* sets out an overview of the *NPF* Strategy which includes reference to 'Compact Growth' as follows:

- *Targeting a greater proportion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas.*** [Our Emphasis]
- ***Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport'**.* [Our Emphasis]

The *NPF* expressly seeks the densification of infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.' [Our Emphasis]

The *NPF* also sets out the following regarding future growth needs in Section 6.6:

'Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Irelands cities.' [Our Emphasis]

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in the Greater Dublin Area.

In our professional planning opinion, the *NPF* supports the provision of the proposed mixed-use development through increased density and height at the subject site having regard to the scale of the site, the design of the development which protects existing residential amenity, its proximity to public transport and local amenities, retail and commercial services and facilities, the express requirement of national policy to increase densities and the surrounding planning history.

Although the height (on parts of the site) and the density will increase from the extremely low immediate context of old Kiltarnan, it has been provided in an appropriate transitional manner between existing lower scaled developments in the area to the newer higher density schemes permitted under the current *Kiltarnan LAP*.

6.2.2 National Strategic Outcomes and Objectives

Section 10.3 of the *NPF* identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the *NPF* (to create a shared set of goals for every community across the country) as follows:

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

A number of key National Policy Objectives ("NPOs") have been identified throughout the *NPF* in order to successfully deliver the 10 No. Strategic Outcomes.

National Policy Objective 74 states that proposals should ‘*secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.*’

The table below sets out how the proposed development will contribute towards achieving the 10 No. National Strategic Outcomes identified in the *NPF* as follows:

Consistency with National Strategic Outcomes			
No.	Objective	How is it Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised site at the centre of Kiltarnan Village.	Yes
2:	Enhanced Regional Accessibility;	The existing bus services, which connect to Dublin City Centre, will be enhanced as part of Bus Connects, the future bus network proposals providing frequent public transport from both the Enniskerry and Glenamuck Roads.	Yes
3:	Strengthened Rural Economies and Communities;	<p>The site is located in the centre of Kiltarnan Village with access to a pub/restaurant, a country market, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kiltarnan Church of Ireland National School, Our Lady of the Wayside National School and Kiltarnan Adult Education Centre as well as religious services in the Village such as Kiltarnan Parish Church and Our Lady of the Wayside Church.</p> <p>The proposed development includes a Neighbourhood Centre and Village Green at the heart of the scheme that promotes community inclusivity.</p>	Yes
4:	Sustainable Mobility;	Promoting active and sustainable transport due to the provision of permeable pedestrian and cycle links through the site, including through the Dingle Way to the future Glenamuck Link Distributor Road and proximity of public transport (incl. the LUAS, bus routes and future Bus Connects links).	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The proposed 383 No. new residential dwellings and Neighbourhood Centre and Village Centre comprising of commercial, retail, medial and childcare units will benefit the local economy of Kiltarnan Village and create a stronger and more vibrant community and economy in the centre of Kiltarnan.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents with the provision of 2,934 sq m communal open space, in addition to 18,879 sq m of public open space, including a new	Yes

		Village Green for the community. The scheme requires a minimum of 15% of the site area to be provided as public open space, resulting in a requirement for 16,144 sq m of public open space to be provided. The scheme provides significantly in excess to the minimum requirement and this, in conjunction the pedestrian/cycle links provided through the site, will enhance the amenity of Kiltiernan Village.	
8:	Transition to a Low Carbon and Climate Resilient Society;	Sustainable modes of transport are encouraged through the pedestrian and cycle links to the surrounding area and the provision of bicycle parking. Green Roofs and SUDS infrastructure have been included within the design of the subject scheme and the scheme will achieve a high energy rating and compliance with building standards.	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources; and	Sustainable modes of transport encouraged, and sustainable management of water use and waste output, as detailed in accompanying reports.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	The subject scheme includes a creche and a medical unit within the Neighbourhood Centre, and there are schools such as Kiltiernan Church of Ireland National School, Our Lady of the Wayside National School and Kiltiernan Adult Education Centre in Kiltiernan Village. The Social Infrastructure Audit prepared by KPMG Future Analytics concludes that <i>'the future demand generated by the proposed development...is likely be absorbed by the existing schools' network...and other planned schools currently under development within the area'</i> .	Yes

A number of key national policy objectives are outlined in the *NPF* in order to successfully achieve the 10 No. Strategic Outcomes outlined above.

We have carried out an assessment of the NPOs identified in the *NPF* and have identified the relevant objectives that are applicable to the proposed development. The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste Environmental Issues; and

- Implementing the *National Planning Framework*.

6.2.3 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **National Policy Objective 1b** projects that the population of the Eastern and Midland Region will increase by 490,000 – 540,000 additional people.
- **National Policy Objective 1c** projects an additional 320,000 No. people in employment in the Eastern and Midland Region.
- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a** – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **National Policy Objective 3b** – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **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.
- **National Policy Objective 5** – Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 8** – Aims to ensure the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1.173,000 No. (2016) to 1,408,000 No. (2040).
- **National Policy Objective 11** – In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

The development will facilitate the projected growth in population and persons in employment in the Eastern and Midland Region as identified in NPO 1b and 1c.

A core principle of the *NPF* set out in Section 6.6 states that proposals should:

‘Prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more

efficient use of land and allowing for greater integration of existing infrastructure.' [Our Emphasis]

The proposed development is located on predominantly undeveloped land in Dublin, served by public transport and is within a short distance of key employment locations such as Kiltarnan Village, Stepside Village, Carrickmines, Enniskerry, Sandyford Business District, Dundrum and links to the M50.

As such the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide for 50% of future population and employment growth with the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The *NPF* recognises that to achieve the targets set out in NPOs 3a and 3b of the framework which relate to the delivery of new homes, housing outputs will undoubtedly necessitate an increase in the provision of apartments. NPO 8 requires targeted population growth for Dublin city and suburbs and the proposed development will contribute towards increasing the population of this area of Dublin.

Furthermore, it is noted in Section 6.6 that *'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'*

The Neighbourhood Centre will be high quality, attractive and liveable, and will be a place where the residents and the wider Kiltarnan community will have the opportunity to interact with each other ensuring an integrated community within the scheme and the Village. Therefore, it is considered that the proposal will contribute to creating an attractive, liveable, well designed and high-quality urban place as set out in NPO 4 and will ensure the site is sustainably developed contributing towards achieving NPO 5 which aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The proposed scheme involves the development of an existing underutilised site and therefore is fully in accordance with the preferred approach of the *NPF*. The development will encourage social interaction between the residents of the scheme particularly by providing a Neighbourhood Centre, Village Green and a new Community Centre, creating a strong sense of community. The proposed development is consistent with the NPOs set out within this Section.

6.2.4 Current Trends in Tenure and Household Formation in Ireland

The *NPF* acknowledges at Section 4.5 that Ireland's housing crisis has resulted in:

'A time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained'.

The following NPOs respond to the changing nature of household formation and trends in tenure in current planning discourse.

- **National Policy Objective 6** – Regeneration and rejuvenate cities, towns and villages of all types of scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment

activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

- **National Policy Objective 11** – outlines that there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages.
- **National Policy Objective 32** – Details the target of delivering 550,000 No. additional households to 2040.

In accordance with NPOs 6,11 and 32, the development will rejuvenate this site, opening up the site for the public to utilise while also providing much needed housing for the area, which will encourage more people to live in the existing urban footprint whilst also contributing towards generating more jobs and activity within the existing urban area and will contribute towards the target of delivering 550,000 No. additional households to 2040.

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the State consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* The document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it.'* [Our Emphasis]

The subject scheme represents proper planning and sustainable development as the site is an underutilised site, located within an existing village and the future residents of the scheme will benefit from the site's close proximity to nearby public transport, employment, services and facilities and the Neighbourhood Centre will enhance the provision of services for Kiltiernan Village.

The development offers high quality accommodation at a time when the *NPF* acknowledges the constrained urban housing market.

6.2.5 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed mixed-use development at the subject site.

- **National Policy Objective 26** – Outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with Planning Policy.
- **National Policy Objective 27** – Aims 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 the existing and proposed developments and integrating physical activity facilities for all ages.

The subject site is proximate to several important transport facilities in the vicinity. The Ballyogan Wood LUAS stop is located c. 2.3-c. 2.7 km to the north-east (c. 27-31 No. minute walk). Access to the M50 Carrickmines (Exit 15) is located c. 1.9-2.3 km from the subject site.

Dublin Bus route No. 44 serves the Kiltarnan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kiltarnan within the Bus Connects scheme, such as Routes No. 88, L26, L13 and P13 which will all serve Kiltarnan Village and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area such as University College Dublin.

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines (Exit 15) and the proposed GDRS scheme which will reduce traffic passing through the village, this makes Kiltarnan Village a hub for activity and increases the area's potential to become a model suburban village.

6.2.6 Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered to be most applicable to the mixed-use development at the subject site.

- **National Policy Objective 13** outlines that to achieve well-designed high-quality outcomes performance-based standards will be put in place such as building height and car parking.
- **National Policy Objective 33** states residential development at appropriate scales within sustainable locations will be prioritised.
- **National Policy Objective 35** outlines the requirement to '*increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*'

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the subject site, particularly due to the scheme's high-quality design, siting, layout, mix of dwellings and the provision of a Neighbourhood Centre. The Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment both demonstrate that no significant material impacts will occur as a result of the proposed development. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

In line with NPO 13, the *Development Plan, Apartment Guidelines, 2020*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* and the *Urban Design Manual – A Best Practice Guide (2009)*; set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33, providing an increase in height and density on parts of the subject site within an existing settlement, whilst still respecting the context in which it is being provided, which is therefore in accordance with NPO 35.

6.2.7 Waste and Environmental Issues

The *NPF* sets out a number of planning policy objectives that specifically relate to Waste and Environmental issues. The following objectives are considered to be most applicable to the proposed development of this planning application:

- **National Policy Objective 52** sets out the planning systems must respond to the environmental challenges and have regard to relevant environmental legislation.
- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce the carbon footprint by integrating climate action into the planning system.
- **National Policy Objective 56** sets out the intentions to sustainably manage waste generation.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure that efficient and sustainable management and conservation of water resources and water services infrastructure.
- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that '*all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate*'.

The subject site is a key underutilised site ideally located for residential and commercial development in the heart of Kiltiernan Village and thus the redevelopment of these underutilised lands is in accordance with the waste and environmental policies outlined above.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The development will support the efficient use of core urban land and will contribute towards reducing the rate of urban sprawl in accordance with NPO 53.

The development and redevelopment of the subject site will provide a population in close proximity to public transport and encourage walking and cycling, in accordance with NPO 54 and NPO 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The proposed development will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for

the wider area and will contribute to the green infrastructure network (NPO 58), through the provision of an array of new green spaces.

The site is in the centre of Kilternan Village with access to a pub/restaurant, a country market, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre as well as religious services in the Village such as Kilternan Parish Church and Our Lady of the Wayside Church.

The proposed scheme provides 679 No. car parking spaces (including 73 No. electric vehicle parking spaces and 1 No. car share space) and 536 No. bicycle parking spaces. The area is serviced by bus route Nos. 44, 63 and 118. The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop. The existing bus services will be enhanced as part of Bus Connects, the future bus network proposals providing frequent public transport. The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

The proposed development is supported by the following reports which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues, particularly in accordance with NPO 63, 65 and 75:

- Landscape Rationale prepared by Ronan MacDiarmada & Associates Limited Landscape Architects & Consultants;
- Environmental Impact Assessment Report prepared by Enviroguide Consulting;
- Traffic and Transportation Assessment prepared by Atkins Consulting Engineers;
- Appropriate Assessment Screening Report by Scott Cawley;
- Engineering Infrastructure Report & Stormwater Impact Assessment by Roger Mullarkey & Associates;
- Site Specific Flood Risk Assessment by Roger Mullarkey & Associates;
- Arboricultural Report by Arborists Associates Limited;
- Acoustic Design Statement by RSK Ireland Limited;
- Construction and Demolition Waste Management Plan by Enviroguide Consulting
- Construction Environment Management Plan by Enviroguide Consulting ; and
- Outline Operational Waste Management Report prepared by Enviroguide Consulting.

6.3 **Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)**

The *Action Plan for Housing and Homelessness – Rebuilding Ireland* recognises that a significant increase in new homes is needed and is referenced in the long title to the *Planning and Development (Residential Tenancies) act 2016, as amended*. The Action Plan outlines a 5 No. pillar approach;

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2 and Pillar 3.

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.
- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The publication stipulates in relation to the delivery of housing that:

'the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time.'

The subject scheme proposes the development of an underutilised site in the heart of Kiltiernan Village. The proposed development will contribute towards addressing the national housing crisis through the provision of 383 No. dwelling units, that will be available to purchase (with the exception of Part V units). The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 39 No. social housing units, which represents 10% of the proposed units in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

The development is consistent with the policy guidance as set out within the *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)*.

6.4 Housing for All– a New Housing Plan for Ireland, September 2021 (“Housing for All”)

Housing for All - a New Housing Plan for Ireland (“Housing for All”) 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.

The overall objective of *Housing for All* is that:

'Every citizen in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.'

Section 3 of *Housing for All* states:

'An average of 33,000 homes must be provided every year between now and 2030.'

The policy has 4 No. pathways to achieving *Housing for All*:

- Supporting Home Ownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock

The pathways contain actions to be taken to achieve the objectives outlined above.

The subject scheme providing 383 No. residential units in an ideal location in Kiltiernan Village, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 39 No. Part V units (10%). Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

6.5 ***Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) ("Building Height Guidelines")***

The *Urban Development and Building Heights Guidelines for Planning Authorities* ("*Building Height Guidelines*") were adopted in December 2018 under Section 28 of the 2000 Act. An Bord Pleanála and Planning Authorities must have regard to these Guidelines and, in particular, compliance with the Specific Planning Policy Requirements (SPPRs) is mandatory (see Section 9(3)(b) of the SHD Act).

The *Building Height Guidelines* set out that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

'Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.' [Our Emphasis]

The *Building Height Guidelines* further note that:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.' [Our Emphasis]

The *Building Height Guidelines* also emphasise that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The *Building Height Guidelines* expressly seek increased building heights in urban locations:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations**. There is therefore a presumption in favour of buildings of **increased height in our town/city cores and in other urban locations with good public transport accessibility**.'* [Our Emphasis]

The *Building Height Guidelines* also advise that taller buildings can assist in contributing to a sense of place:

*'Furthermore, while **taller buildings** will bring much needed additional housing and economic development to well-located urban areas, they **can also assist in reinforcing and contributing to a sense of place** within a city or town centre, such as indicating the main centres of activity, important street junctions, public spaces and transport interchanges. In this manner, **increased building height is a key factor in assisting modern placemaking and improving the overall quality of our urban environments**.'* [Our Emphasis]

The layout of the proposed development has comprehensively considered the position of the proposed blocks and units, and sought to provide a development that both adheres to national policy discourse, whilst also respecting the scale of character of its receiving environment. It is considered that the layout of the scheme as proposed is the optimal solution for the lands (e.g. higher apartment blocks fronting Glenamuck Road and Neighbourhood Centre fronting Enniskerry Road will enhance legibility; the Village Green and Dingle Way will enhance permeability; and the scheme has sought to design around the existing trees on site).

It is further considered that the scheme design strikes a balance between respecting the parameters of the *Kiltarnan LAP* and ensuring the development potential of a strategically positioned and underutilised plot is maximised, in the heart of Kiltarnan Village.

As is detailed extensively in the accompanying Material Contravention Statement, the *Kiltarnan LAP* prescribes heights of 2-4 No. storeys for the subject lands. The proposed development is predominately in accordance with the heights prescribed in the *Kiltarnan LAP*, with the majority of the scheme ranging from 2-4 No. storeys across the site. However Apartment Blocks C and D to the north-east of the site extend to 5 No. storeys including podium/undercroft level. The apartment blocks are located at the proposed entrance from Glenamuck Road where 4 No. storey elements are within the parameters of the *Kiltarnan LAP*. Therefore the proposed development only slightly exceeds the *Kiltarnan LAP* parameters by 1 No. storey in a small portion of the site.

A Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment have been carried out in conjunction with the design of the subject development. These assessments demonstrate that the proposed layout and design will not have an undue negative impact on its receiving environment and thus can be assimilated into the surrounding environment.

It is our professional planning opinion that the site has the capacity and capability to accommodate a minor increase in height beyond that prescribed in the *Kiltiernan LAP*, which was adopted in 2013, well in advance of the *Building Height Guidelines*.

Chapter 3 of the *Building Height Guidelines* expressly seeks increased building heights in urban locations:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations**. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.'*
[Our Emphasis]

Under the heading 'Development Management Principles', the *Building Height Guidelines* state (at paragraph 3.1) that it is Government policy that building heights must generally be increased, and that Planning Authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights in pursuit of the *Building Height Guidelines*.

The third bullet point or "broad principle" in paragraph 3.1 requires consideration to whether the implementation of the pre-existing policies of a plan that predates the *Building Height Guidelines* align with and support the objectives and policies of the *NPF*. The *NPF* is considered above. As the *Kiltiernan LAP* was made before the *NPF* and *Building Height Guidelines* were published, the pre-existing policies in relation to height in the *Kiltiernan LAP* and National Policy do not fully align. There is no doubt, therefore, that the Specific Planning Policy Requirements in the *Building Height Guidelines* are relevant to the assessment of this proposed development.

Section 3.1 of the *Building Height Guidelines* states that 'Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines':

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed scheme involves the development of a key underutilised, site in a sustainable village centre location (albeit not brownfield, it is an infill site in a village centre location). The subject development will contribute towards delivering compact growth in our urban areas and we note in this regard that residential developments have been recently granted in Kiltiernan that are located further from the village core. The scheme is therefore fully in accordance with the preferred approach of the *NPF* which seeks compact growth.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?

Other than as set out in the Material Contravention Statement, the proposal is in line with the *Development Plan* and *Kiltiernan LAP*. In our professional opinion, the proposal is consistent with the *Building Height Guidelines* in relation to height, and the *Kiltiernan LAP* should be read in conjunction with the *Building Height Guidelines*. In addition, the new *Development Plan* adopted in April 2022 allows an assessment of development proposals with increased height and sets out principles that will be considered when assessing capacity for height, and in our opinion, this assessment (as set out in Section 8.2.4 of this Report) demonstrates that the slightly increased height in a small portion of the site is acceptable.

It is considered that the heights proposed principally ranging from part 2 No. storeys to part 4 No. storeys with apartment blocks of 5 No. storeys including podium/undercroft in one area of the site, are appropriate at the subject lands especially having regard to the large extent of the subject site and frontage onto Enniskerry Road, Glenamuck Road and the future GLDR, in order to accord with Government policy to increase building heights in sustainable locations.

The subject scheme respects the residential amenity of surrounding existing dwellings, which will assist in assimilating the development into the area. The Daylight and Sunlight Assessment and Landscape and Visual Impact Assessment demonstrate that the layout of the subject development will not have any potential adverse impacts on the surrounding area.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

The prescriptive heights of the *Kiltiernan LAP* may be considered incompatible with the developments in National Policy, which have occurred since the Plan's adoption. The *Development Plan*, which was recently adopted on 21st April 2022, allows an assessment of increased height to be carried out (Table 5.1 of Appendix 5). We have provided a detailed response to Table 5.1 and in our opinion, the proposed development ranging in height from part 2 to part 5 No. storeys (including podium/undercroft level in Apartment Blocks C and D and in the Neighbourhood Centre) is appropriate for the subject site. However, we have included building height in the Material Contravention Statement in the event that An Bord Pleanála consider the increase in building height to represent a material contravention of the *Kiltiernan LAP*.

If a scheme of lower heights was provided, it is our opinion that this would not represent sustainable development of underutilised lands and thus it could be considered that the *Kiltiernan LAP* 2-4 No. storeys does not align with the objectives and policies of the *National Planning Framework* ("NPF"). As noted above, the newly adopted *Development Plan* allows an opportunity for an assessment of further increased height allowed with respect to Table 5.1.

We note, in particular, National Policy Objective 35 of the *NPF*, which seeks an increase in residential density in settlements, through a range of measures including infill development schemes, area or site-based regeneration and increased building heights.

It is our opinion that the subject site has the potential for increased heights in the form of 2 No. apartment blocks, which only slightly exceed the prescriptive heights of the *Kiltiernan LAP* by 1 No. storey, to sustainably densify this strategic site having regard to the high quality architectural

composition of the scheme, the public open spaces and linkages provided and the site's location at a prominent village centre location, which will all contribute towards absorbing the proposed building heights. The remainder of the site including houses, duplexes and the Neighbourhood Centre ranges from 2 to 4 No. storeys which is within the parameters of the *Kiltiernan LAP*.

A Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment have been carried out in conjunction with the design of the subject development, which highlight that the subject site has the potential to absorb the proposed greater heights. These technical assessments demonstrate that the proposed development will not have an undue negative impact on its receiving environment.

Specific Planning Policy Requirement 3

SPPR₃ of the *Building Height Guidelines* sets out that:

'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 [below]; 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.'

Section 9(3) of the SHD Act provides as follows:

'(3) (a) When making its decision in relation to an application under this section, the Board shall apply, where relevant, specific planning policy requirements of guidelines issued by the Minister under section 28 of the Act of 2000.

(b) Where specific planning policy requirements of guidelines referred to in paragraph (a) differ from the provisions of the development plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the development plan.'

We now wish to consider how the proposed development complies with the specified criteria under Section 3.2 of the *Building Height Guidelines*, which are referred to in SPPR₃ as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> 	<ul style="list-style-type: none"> • The subject site is considered eminently suitable for development given the site's location in the centre of Kiltiernan Village with the Ballyogan Luas stop (green line) located c. 2.3 km – c. 2.7 km to the north-east (c. 26-31 minutes walking distance). Kiltiernan is also served by bus route Nos.

	<p>44, 63 and 118. These modes of transport provide direct connections to Dublin City Centre and institutions such as Dublin City University in Glasnevin, where residents can also easily transfer to other routes (red line) and modes (buses and trains) for onward connectivity.</p> <ul style="list-style-type: none"> • The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.2 km-c. 2.4 km (c. 27-30 minutes walking distance) from Stepside Village. • The development itself proposes cycle parking in accordance with the Dun Laoghaire-Rathdown standards, and the site will provide permeable pedestrian/cycle connections to the surrounding area. • A Mobility Management Plan and Traffic and Transportation Assessment prepared by Atkins provides further detail in relation to the existing and proposed public transport facilities serving the subject site. • As part of the Traffic and Transport Assessment, Atkins studied the potential impact of the development on bus and luas services. The study (see Section 12 of the Traffic and Transport Assessment) concluded that the additional demand on bus services would be negligible. In relation to the luas services, it was concluded that the additional loading would not result in capacity issues for the existing luas services.
<ul style="list-style-type: none"> • <i>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 landscape and visual</i> 	<ul style="list-style-type: none"> • It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing and a Neighbourhood Centre on underutilised lands at the heart of Kilternan Village, which will contribute positively towards addressing the national housing crisis and will provide a range of services and facilities for the

<p><i>assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.</i></p>	<p>future residents of the scheme and the existing and future residents of Kiltiernan. The location of the higher buildings aligns with the general location of the permitted higher building in the adjoining Rockville development. The existing topography of the site has been fully considered in the overall public realm and built fabric arrangements, particularly in the eastern portion of the lands where the streets and houses have been configured parallel to the prevailing contours. This enables Part M access to the achieved and easy gradients along streets and footpaths to be maintained.</p> <ul style="list-style-type: none"> • The proposed development will create a strong and defined frontage along Enniskerry Road and Glenamuck Road, and the Village Green and Neighbourhood Centre accessed from Enniskerry Road will be a significant planning gain for the local area. This will also support the activation of the site, which is currently muted due to inactive frontage provided at present. • The design of the development and its layout is such that the taller 5 No. storey elements are provided closer to the taller elements in the neighbouring Rockville development and fronting Glenamuck Road. This ensures that the development integrates with the surrounding area, respecting the pattern of development present thereat, but allowing for a gradual uplift in height in a select location, and an increase in density overall. Therefore, the subject scheme will result in the appropriate densification of a key infill site, providing much needed residential units which will contribute towards addressing the national housing crisis. • The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space, which has been subject to detailed design by Ronan Mac Diarmada &
--	--

	<p>Associates Landscape Architects & Consultants.</p> <ul style="list-style-type: none"> • A Daylight and Sunlight Analysis has been carried out by 3D Design Bureau, which demonstrates that no significant material impacts will occur to the surrounding properties. • A Landscape Visual Impact Assessment has been carried out as part of the EIAR, which clearly demonstrates that there will be no adverse visual impact as a result of the proposed development. CGIs prepared by 3D Design Bureau are included, which demonstrate the high-quality design of the proposed scheme.
<ul style="list-style-type: none"> • <i>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.</i> 	<ul style="list-style-type: none"> • The subject scheme seeks to limit urban sprawl by making best use of an existing infill site in the centre of the village. The proposed scheme will make a positive contribution to the surrounding area by developing a key underutilised site and providing a high-quality residential development (which will contribute positively towards addressing the national housing crisis), which will also provide linkages through the site to the neighbouring Rockville development and the future GLDR. The newly proposed Neighbourhood Centre fronting the new Village Green will make a positive contribution to place making. • The scheme will create visual interest in the streetscape along Enniskerry Road and Glenamuck Road and will positively contribute to placemaking through the linkages provided and the Neighbourhood Centre and Village Green fronting Enniskerry Road. • The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space, which has been subject to detailed design by Ronan MacDiarmada & Associates Landscape Architects & Consultants, and the scheme will provide focal point for the Village. The open

	<p>spaces will enhance the quality of living of future occupants and the wider public and thus will positively contribute to place-making. The delivery of the scheme, which varies in height from 2 to 5 No. storeys is considered as being of notable benefit to the community in terms of permeability and accessibility.</p> <ul style="list-style-type: none"> • The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an infill site in the centre of the village, providing varied and visually interesting façades for the surrounding streetscape, which will positively contribute to place-making.
--	---

Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i> 	<ul style="list-style-type: none"> • The scheme has allowed and considered the future GLDR along the north-eastern boundary of the site and the upgrades to the Glenamuck Road to the north of the site (Part 8 development). • The design layout includes a number of open spaces available to the public such as the village green, a woodland walk, pocket park and the Dingle Way, which will positively contribute to the natural environment. The scheme retains a large quantum of trees within established tree belts on site. • In terms of the built environment, there are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Areas at the subject site. There are Protected Structures on neighbouring lands i.e. Rockville to the north-east and Our Lady of the Wayside Church to the south-west, which have been duly considered as part of the overall layout. There has already been housing provided surrounding the

	<p>Rockville Protected Structure and the proposed development will comprise 3 No. storey duplexes and the Village Green opposite the Church, which will easily assimilate with this Protected Structure. Consequently, there are no protected or sensitive natural or built features at risk of negative impacts that may arise as a result of the realisation of up to 5 No. storeys at the subject site.</p> <ul style="list-style-type: none"> • The subject development predominately ranging in height from 2 to 5 No. storeys with the 5 No. storey apartment blocks fronting Glenamuck Road and the 4 No. storey Neighbourhood Centre fronting the Village Green (opening onto the Enniskerry Road), can be accommodated at the subject lands, whilst remaining respectful of the surrounding context. As noted above, the location of the 2 No. higher apartment blocks aligns with the general location of the permitted higher building in the adjoining Rockville development. • The high-quality design of the proposed development will allow the development to be integrated into the surrounding area and as noted above, will positively enhance the legibility and streetscape of the surrounding area. • The development will make a positive contribution to the neighbourhood and streetscape by: delivering various open spaces and permeable links; providing a Neighbourhood Centre which will serve the local community; activating the streetscape along Enniskerry Road and Glenamuck Road; enhancing the natural vegetation at the site by introducing a broad planting regimen; augmenting the critical mass required to sustain local service provision and businesses; and broadening the number and type of housing options available in the area.
--	---

	<ul style="list-style-type: none"> • The design of the public and communal open space includes toddler’s play area, children’s play area, seating, lawns, planting and pedestrian paths, which will positively contribute to the natural environment. • Given the context and size of the subject site, the site is suitable to accommodate building heights of 2 to 5 No. storeys, whilst remaining respectful of the surrounding context through the adoption of separation distances to boundaries and variation in height throughout the site. Therefore, it is our opinion that, through a high standard of design, siting and layout and large public open spaces and linkages through the site, the proposed development knits successfully with the surrounding context.
<ul style="list-style-type: none"> • <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> 	<ul style="list-style-type: none"> • The Design Statement prepared by MCORM Architects details the use of materials, the elevational treatment and modulated height arrangement which break up the massing of the proposed development. • The development provides houses, duplexes, apartments and a Neighbourhood Centre which naturally provides a varied design and thus the scheme will not be monolithic. • The <i>Design Statement</i> details the proposed materials and façade treatments which are also clear when viewing the Verified Views and CGIs prepared by 3D Design Bureau. The Design Statement notes: <ul style="list-style-type: none"> <i>'...Depending upon the character areas within the site the materials vary. Between character areas there will be distinct differences between brick types and material choice, elevation treatment and building form in order to create variety and visual interest across the scheme.</i>

	<p><i>...The proposed buildings employ a controlled palette of materials with a mix of traditional and contemporary typologies. The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.</i></p> <p><i>...Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.</i></p> <p><i>...The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development.'</i></p> <ul style="list-style-type: none"> • It is clear that a significant effort has been made to provide a well-considered and interesting building form which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.
<ul style="list-style-type: none"> • <i>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)".</i> 	<ul style="list-style-type: none"> • The scheme includes c. 18,879 sq m high-quality public open space, including the Village Green fronting onto Enniskerry Road which will enhance the urban design context for the Village. In addition, some c. 2,934 sq m of communal open space will be provide for the residents of the apartments and duplexes. • The scheme will provide active surveillance of the public and communal open spaces throughout the development. The new public spaces

	<p>and linkages will significantly improve the public realm and will also enhance legibility and permeability in the area and thus represents a key planning gain for the wider neighbourhood. Importantly, the development will not be gated and will be open to the public.</p> <ul style="list-style-type: none"> • The Site Specific Flood Risk Assessment prepared by Roger Mullarkey & Associates and enclosed with this application concludes that: <ul style="list-style-type: none"> <i>'As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.</i> <i>In accordance with the above noted Guidelines, as sequential staged approach was adopted in assessing the flood risk for the subject development.</i> <i>It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.</i> <i>It is concluded that a mixed residential and commercial development is appropriate on the subject lands.</i> <i>It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.</i> <i>Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding.'</i>
--	--

<ul style="list-style-type: none"> • <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> • The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area, particularly due to the attractive links provided through the site including the Dingle Way, and the provision of a Neighbourhood Centre, which will serve the local community. The Village Green fronting onto Enniskerry Road will animate the streetscape and will make a positive contribution to the legibility of the Village. The existing underutilised site will be replaced with a high-quality development, which will be a positive insertion to the area. • The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space.
<ul style="list-style-type: none"> • <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> • The surrounding context of the subject site is generally characterised by a mix of low-density residential dwellings with a 4 No. storey apartment block abutting the north-eastern corner of the site. The scheme includes a Neighbourhood Centre, which will positively contribute to the mix of uses in the area. There is a large mix of dwelling types provided ranging from 1 No. bedroom apartments to 4 No. bedroom dwellings. • The proposed scheme seeks to contribute towards reducing the deficit in Dublin’s housing supply. The subject site is a key underutilised site in the village centre and provides a prime opportunity to provide a mixed-use development of suitable height, scale and mass that will result in the appropriate densification of the site.

Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>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.</i> 	<ul style="list-style-type: none"> The height of the scheme is 2 to 3 No. storeys throughout the majority of the scheme and thus should not be challenging from a daylight and sunlight perspective. The scheme only provides an increase in height to 4 No. storeys in the Neighbourhood Centre fronting the Village Green and 5 No. storeys near the Glenamuck Road entrance. The proposed development has been carefully designed and modulated to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites and minimal overshadowing impacts, and thus the scheme will have a limited impact on the amenity of surrounding properties. This is detailed in 3D Design Bureau's Daylight and Sunlight Assessment Report. The results of the enclosed Daylight and Sunlight Assessment demonstrate that the proposed scheme will not have an unacceptable or adverse impact on itself or on the surrounding properties with regard to daylight and sunlight. The proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight within the vast majority of the proposed units as the units perform well in terms of Average Daylight Factor (c. 98% of rooms compliant). The public and communal open spaces will all generally be provided well excellent levels of sunlight.
<ul style="list-style-type: none"> <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet</i> 	<ul style="list-style-type: none"> As noted above, the Daylight/Sunlight Assessment and the Landscape Visual Impact Assessment ultimately demonstrate that no material impacts will occur on neighbouring properties.

<p><i>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 and an effective urban design and streetscape solution.</i></p>	<ul style="list-style-type: none"> • The <i>Daylight and Sunlight Assessment Report</i> prepared by 3D Design Bureau includes a detailed assessment and review of the proposed development and the possible impacts of the proposed development on existing and potential neighbouring developments. The Board is directed to review this Report, included as part of this application pack. • As part of a compensatory design solution for the rooms that do not meet the recommended minimum average daylight factor, the proposed development has incorporated a number of compensatory design measures including larger apartment sizes, larger room sizes, larger private amenity space and views to the public and/or communal open spaces. We have included a list of the rooms that fall short of the daylight provisions and demonstrated the compensatory design measures provided in the Material Contravention Statement. • The scheme will also contribute towards achieving wider planning objectives such as increased building heights and density and the development of infill lands in a sustainable location and will represent high-quality urban redevelopment for the area especially due to the new permeable links provided, the New Neighbourhood Centre, open spaces, and the activation of the streetscape along Enniskerry Road and Glenamuck Road.
---	--

Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements to avoid/</i> 	<ul style="list-style-type: none"> • The scheme predominately provides 2 and 3 No. storey units with only two 5 No. storey apartment blocks to the north-east of the site and a 4 No. storey

mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

Neighbourhood Centre in the centre/south-west of the site, and thus a Wind Assessment is not required. Generally these assessments are required when buildings are at least 30 No. metres in height. The maximum height of the Neighbourhood Centre is c. 14.7 metres (with the telecommunications infrastructure extending to c. 16.286 metres). The maximum height of the apartment blocks is c. 15.975 No. metres, which is well below 30 No. metres.

- In addition, an Acoustic Design Statement was prepared by RSK Ireland Limited. The Acoustic Design Statement concluded the following:

'The aim of this study is to assess the potential impacts to future residents and nearby receptors and to provide recommendations, where necessary, to the risk of nuisance arising from operational phase noise emissions.

Baseline monitoring has found pre-existing noise levels are typical of a suburban location in the vicinity of a busy road network. Future noise emissions from the Glenamuck District Roads Scheme (GDRS) have been taken into account and resultant expectant future noise levels on site established via modelling.

This report also considers the potential inward impact of road traffic on the proposed development. Assessment methodologies use guidance from The Professional Guidance on Planning & Noise (ProPG), May 2017. The two primary stages of the ProPG assessment are the "Stage 1" initial noise risk assessment of the proposed site and "Stage 2" detailed appraisal of the proposed development and preparation of an Acoustic Design Statement.

	<p><i>The site noise survey has also been used to assess the sites noise risk categories, as per the ProPG "Stage 1" assessment. The ProPG noise risk categories, for façades most exposed to road traffic, are Negligible to Medium for daytime and Negligible to Medium/High for night-time periods.</i></p> <p><i>Recommendation to mitigate noise emissions, as specified in the "Stage 2" Acoustic Design Statement, include the following:</i></p> <ul style="list-style-type: none"> • <i>Provision of glazing with minimum sound insulation properties as outlined in this document.</i> • <i>Provision of acoustic attenuation to ventilation systems for dwellings as outlined in this document.</i> <p><i>In the developments operational phase, criteria have also been set for new any new building services plant (i.e. such as may be required to service the retail/commercial elements of the proposed neighbourhood centre), to both existing and future residents, in accordance with the methodologies outlined in BS 4142:2014+A1:2019. It has been concluded that the likely noise impact of the developments in its operational phase is not significant.</i></p> <p><i>In summary, it is considered that the site is suitable for residential development subject to the provision of the noise control recommendations as outlined in this report.'</i></p>
<ul style="list-style-type: none"> • <i>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.</i> 	<ul style="list-style-type: none"> • The potential for collision risk is low considering the building location, design and materials used. • No specific issue in relation to this criterion was raised by Scott Cawley Limited.

<ul style="list-style-type: none"> • <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	<ul style="list-style-type: none"> • The Telecommunications Report enclosed and prepared by Independent Site Management Limited notes the following: <ul style="list-style-type: none"> <i>'To provide an adequate allowance for the retention of the 2No. identified Microwave links that will be impacted by the Development, the Applicant is seeking planning permission to install 3No. support poles, affixed to the lift shaft overrun on the Development's neighbourhood centre block B, rising 3metres above roof level.</i> <i>These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each (together with associated telecommunications equipment), which provides an adequate solution for the Applicant to mitigate the impact the Development will have on the existing Microwave links emanating from the existing mast currently within the development site boundary, as well as providing some capacity for future links that may or may not be required.</i> <i>To provide an adequate allowance for the retention of the 6No. identified Radio Frequency links that will be impacted by the Development, the Applicant is seeking planning permission to install 9No. support poles, affixed to ballast mounts on neighbourhood centre block B rising 2.5 metres above parapet level.</i> <i>These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each (together with associated telecommunications equipment), which creates the ability for the Applicant to mitigate the impact the Development will have on the existing Radio Frequency links emanating from the mast within the development site, as well as providing some capacity for future links that may or may not be required.</i>
---	--

	<p><i>To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds'.</i></p>
<ul style="list-style-type: none"> • <i>An assessment that the proposal maintains safe air navigation.</i> 	<ul style="list-style-type: none"> • The subject site is located c. 20 km from Dublin Airport and is not in proximity to any aerodromes, and the proposed development is not of sufficient height to require a detailed Aviation Impact Assessment.
<ul style="list-style-type: none"> • <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> • A <i>Design Statement</i> prepared by MCORM Architects has been submitted with this planning application. • In addition, an <i>Archaeology and Cultural Heritage Chapter</i> is include as part of the EIAR enclosed which details the historic built environment. • A <i>Landscape and Visual Impact Assessment</i> prepared by Enviroguide as part of the EIAR and <i>Verified Views</i> prepared by 3D Design Bureau have also been included with this planning application in order to provide a complete overview of the subject design.
<ul style="list-style-type: none"> • <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> • An <i>Appropriate Assessment Screening Report</i> and <i>Environmental Impact Assessment Report</i> have been prepared and submitted with this planning application.

Conclusion on compliance with criteria under Section 3.2 of the *Building Height Guidelines*:

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The application principally proposes a development ranging in height from 2 to 3 No. storeys and the provision of a 4 No. storey Neighbourhood Centre fronting the Village Green along Enniskerry Road and 2 No. apartment blocks at the entrance from Glenamuck Road extending to 5 No. storeys in height including podium, which is considered to be appropriate having regard to the location of the subject site in the centre of Kiltiernan Village (the 5 No. storey apartment blocks are only 1 No. storey higher than the *Kiltiernan LAP* parameters). The scheme has also provided the opportunity to open up

the site and provide an enhanced public realm in addition to a Neighbourhood Centre and permeable links. It is considered that the proposed height is in accordance with Table 5.1 of Appendix 5 of the *Development Plan* (see Section 8.2.4 of this Planning Report & Statement of Consistency for a response to Table 5.1), which allows an assessment of increased building height, however we have included this in the Material Contravention Statement in the event that An Bord Pleanála consider the height as a material contravention of the *Development Plan / Kiltarnan LAP*.

It is our professional planning opinion that the subject site is capable of achieving additional height and density having regard to the introduction of the *NPF* and the *Building Height Guidelines*, which encourages increased height and density on appropriate sites, particularly as this site is severely underutilised in this sustainable location and is appropriately zoned for development. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties. The scheme will enliven the village centre and will provide a community hub within the core of the village.

6.6 ***Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2020*** (“*Apartment Guidelines, 2020*”)

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments* December 2020 (*Apartment Guidelines, 2020*).

The purpose of the *Apartment Guidelines, 2020* published in December 2020 as an update to the *Apartment Guidelines* published in March 2018 (“*Apartment Guidelines, 2018*”) (only change related to Shared Living policies), is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. The *Apartment Guidelines, 2020* and *2018* build on the content of the *Apartment Guidelines* published in 2015 (“*Apartment Guidelines, 2015*”) particularly in relation to design quality safeguards such as internal space standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.

The *Apartment Guidelines, 2020* and *2018* update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply and projected need for additional housing supply. The Government’s *Rebuilding Ireland – Action Plan for Homelessness, 2016* (“*Rebuilding Ireland*”), the *National Planning Framework – Ireland 2040* (“*NPF*”) and *Housing for All– a New Housing Plan for Ireland, September 2021* (“*Housing for All*”) have both been published since the *Apartment Guidelines, 2015*. We note that the *Development Plan* should be read in conjunction with the *Apartment Guidelines, 2020*. The Specific Planning Policy Requirements of the *Apartment Guidelines, 2020* take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

It is considered that the subject site is located within a ‘Peripheral and/or Less Accessible Urban Location’ as set out in the *Apartment Guidelines, 2020*, which states:

'Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages.*

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.'

The subject site is serviced by bus route Nos. 44, 63 and 118. The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance/6-7 No. minute cycle) from the Ballyogan Wood Luas Stop.

It is considered that Kiltarnan Village is ideally suited to provide a density of c. 44.5 No. units per hectare, particularly since the GDRS has been granted permission by An Bord Pleanála.

As noted in the Apartment Guidelines, 2020, 'the range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors'. In this regard, we note that the subject site is located in c. 2.3 km – 2.7 km from the Ballyogan Luas Stop (c. 26 - 31 minute walk or c. 6-7 minute cycle from the site).

Bus route Nos. 44, 63 and 118 serve the Kiltarnan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin.

Having regard to the accessibility of the subject site, the proposed development has been designed with increased building height and density in accordance with National level guidance.

In terms of meeting future housing need, the *Apartment Guidelines, 2020* set out at Section 2.6 that:

'demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2- person, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type'.

Furthermore, the 2016 Census indicates that:

'if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2- person homes.'

The Apartment Guidelines, 2020 recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand.

The proposed development will consist of a total of 383 No. residential units comprising 165 No. houses, 118 No. duplex units, and 100 No. apartments comprising 27 No. 1 bed units (7%),

128 No. 2 bed units (33%), 171 No. 3 bed units (45%) and 57 No. 4 bed units (15%). The subject site at Kiltiernan Village is suited for the proposed development and will appropriately density this village centre site with a wide range of dwelling units (and a Neighbourhood Centre), in accordance with the *Apartment Guidelines, 2020*. In addition, it is highlighted that the development provides 39 No. social housing units (10% of the total units), which is in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

Specific Planning Policy Requirement 1

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

When the proposed houses are excluded from the unit mix, there are 218 No. apartments and duplexes provided, with 27 No. 1 bed units (12%), 128 No. 2 bed units (59%) and 63 No. 3 bed units (29%), in accordance with SPPR 1.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

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

All apartments meet, and in some cases, exceed the minimum apartment floor areas set out in SPPR3.

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.'* [Our Emphasis]

In relation to the proposed apartments and duplexes, all duplexes and 69 No. of the 100 No. apartments will be dual or triple aspect which represents 86% of the apartments and duplexes, and is therefore well in excess of the minimum requirement set out in SPPR₄ of the *Apartment Guidelines, 2020*. This demonstrates the high-quality design of the subject scheme.

Specific Planning Policy Requirement 5

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

The ground floor of the Neighbourhood Centre is provided with floor to ceiling heights of 3.4 metres at a minimum and the apartment blocks are provided with a minimum height of 2.9 metres. The duplexes are provided with a minimum ground floor to ceiling height of 2.7 metres. All upper levels have been designed with a floor to ceiling height of at least 2.4 metres which is considered good practice.

The proposal is therefore fully in compliance with SPPR₅ of the *Apartment Guidelines, 2020*.

Minimum Aggregate Area of Living/Dining/Kitchen Area and Minimum Widths for Main Living/Dining Rooms

The *Apartment Guidelines, 2020* outline a requirement for minimum aggregate area of living/dining/kitchen space as follows:

Unit Type	Minimum Living/Kitchen/Dining Area Required	Width of Living/Dining Room Required
Studio	30 sq m	4 metres
One Bedroom	23 sq m	3.3 metres
Two Bedroom (3 No. person)	28 sq m	3.6 metres
Two Bedroom (4 No. person)	30 sq m	3.6 metres
Three Bedroom	34 sq m	3.8 metres

Each of the units within the proposed development have been designed in accordance with the standards for the minimum aggregate area of the living/dining/kitchen space and widths of the living/dining room outlined in the *Apartment Guidelines, 2020*.

Minimum Bedroom Floor Areas/Widths

The *Apartment Guidelines, 2020* outline the requirement for minimum bedroom floor areas and widths as follows:

Unit Type	Minimum Floor Area	Minimum Width
Studio	30 sq m	4 metres
Single Bedroom	7.1 sq m	2.1 metres
Double Bedroom	11.4 sq m	2.8 metres
Twin Bedroom	13 sq m	2.8 metres

Each of the units have been designed in accordance with the standards for the minimum bedroom floor areas and widths outlined in the *Apartment Guidelines, 2020*.

Minimum Aggregate Bedroom Floor Areas

The *Apartment Guidelines, 2020* outline the requirement for minimum aggregate bedroom floor areas as follows:

Unit Type	Minimum Aggregate Floor Area
One Bedroom	11.4 sq m
Two Bedroom (3 No. person)	13 + 7.1 sq m = 20.1 sq m
Two Bedroom (4 No. person)	11.4 + 13 sq m = 24.4 sq m
Three Bedroom	11.4 + 13 + 7.1 sq m = 31.5 sq m

Each of the units have been designed in accordance with the standards for the minimum aggregate bedroom floor areas outlined in the *Apartment Guidelines, 2020*.

Minimum Storage Space Requirements

The *Apartment Guidelines, 2020* outline the requirement for minimum storage space as follows:

Unit Type	Minimum Storage Space
Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedrooms or more	9 sq m

Each of the units have been designed in accordance with the standards for the minimum storage space outlined in the *Apartment Guidelines, 2020*.

Private Open Space

The *Apartment Guidelines, 2020* outline a requirement for private open space per unit as follows:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

Private open space has been provided for each of the proposed apartments and duplexes in line with the requirements outlined in the *Apartment Guidelines, 2020* in the form of balconies

and terraces. In many cases the private open space provision for the proposed apartments and duplexes exceeds the minimum standards outlined in *Apartment Guidelines, 2020*.

Communal Amenity Space

The *Apartment Guidelines, 2020* outline the following standards for communal amenity space:

Unit Type	No. of Units	Communal Amenity Space Requirement Per Unit	Total Communal Amenity Space Requirement
Studio	N/A	4 sq m	N/A
One Bedroom	27	5 sq m	135 sq m
Two Bedroom (4 No. Person)	128	7 sq m	896 sq m
Three Bedroom	63	9 sq m	567 sq m
Total:	218 No. (apartments and duplexes)		1,598 sq m

Based on the composition of the proposed 218 No. apartments and duplexes, the subject scheme has a requirement of 1,598 sq m of communal amenity space to meet the minimum standards outlined in the *Apartment Guidelines, 2020*.

The subject scheme includes 2,934 sq m of communal amenity space designed by Ronan MacDiarmada & Associates Landscape Architects & Consultants, which meets the minimum requirement.

6.7 *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* outline a number of key principles which are of relevance to the subject scheme:

'The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:

- *Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;*
- *Pointing the way to cost effective options for housing design that go beyond minimum codes and standards; promoting higher standards of environmental performance and durability in housing construction;*

- *Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and providing homes and communities that may be easily managed and maintained.'*

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for an increase in heights in appropriate locations i.e. in the form of 2 No. apartment blocks fronting Glenamuck Road to the north. In addition, the 4 No. storey Neighbourhood Centre will front the new Village Green.

The scheme will be provided with high quality materials as described throughout the Architect's Design Statement. As set out in the Design Statement:

'...Depending upon the character areas within the site the materials vary. Between character areas there will be distinct differences between brick types and material choice, elevation treatment and building form in order to create variety and visual interest across the scheme.

...The proposed buildings employ a controlled palette of materials with a mix of traditional and contemporary typologies. The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.

...Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.

...The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development.'

The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality apartments, open spaces and commercial floorspace, which ensures that first-rate living conditions will be developed. In addition the design of the subject scheme has evolved through a creative process, in conjunction with the results of the Daylight and Sunlight Assessment to ensure an attractive living environment for future residents.

6.8 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)

Housing Location in Urban Areas

The aim of *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* ("*Sustainable Residential Development Guidelines 2009*") is to set out the key planning principles which should be reflected in development plans and local area plans, and

which should guide the preparation and assessment of planning applications for residential development in urban areas. The document sets out high level aims that:

'Need to be translated into specific planning / design policy and objectives which can be applied at different scales of residential development, ranging from districts or neighbourhoods within large urban centres, to expansion of smaller towns and villages, and finally down to the level of the individual home and its setting.'

The document notes the following in relation to density at Section 6.9 and 6.10:

'(a) Centrally located sites

Within a given smaller town or village, there can be marked variations in development context which affect the density of development and external space standards needed to take account of those contexts. Because of the variety of contexts and the probability of mixed use developments, it is difficult to be prescriptive about the level of density recommended. 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.

The emphasis in designing and considering new proposals should be on achieving good quality development that reinforces the existing urban form, makes effective use of premium centrally located land and contributes to a sense of place by strengthening for example the street pattern or creating new streets. While a 22 metre separation distance between opposing above ground floor windows is normally recommended for privacy reasons, this may be impractical and incompatible with infill development. In these cases, innovation and flexibility will be essential in the interpretation of standards so that they do not become inflexible obstacles to the achievement of an attractive village and small town character in new development.'

The development is located in the centre of Kilterman Village and proposes a net density of 44.5 units per hectare and gross density of 35.5 units per hectare which is in accordance with the requirements of the *Sustainable Residential Development Guidelines 2009*. The high-quality scheme will provide a mix of apartments, duplexes and houses and will include a new Neighbourhood Centre and public and communal open spaces.

We note that distances between internal façades of houses in rear gardens and apartments/duplexes in communal courtyards are set at a minimum distance of 22 metres. In a limited number of locations, wide fronted house types have been introduced in the interest of variety and maximising active street frontage. These units have no first floor windows to habitable rooms to avoid any overlooking and separation distances have been reduced in these instances. An example of such units is provided below:

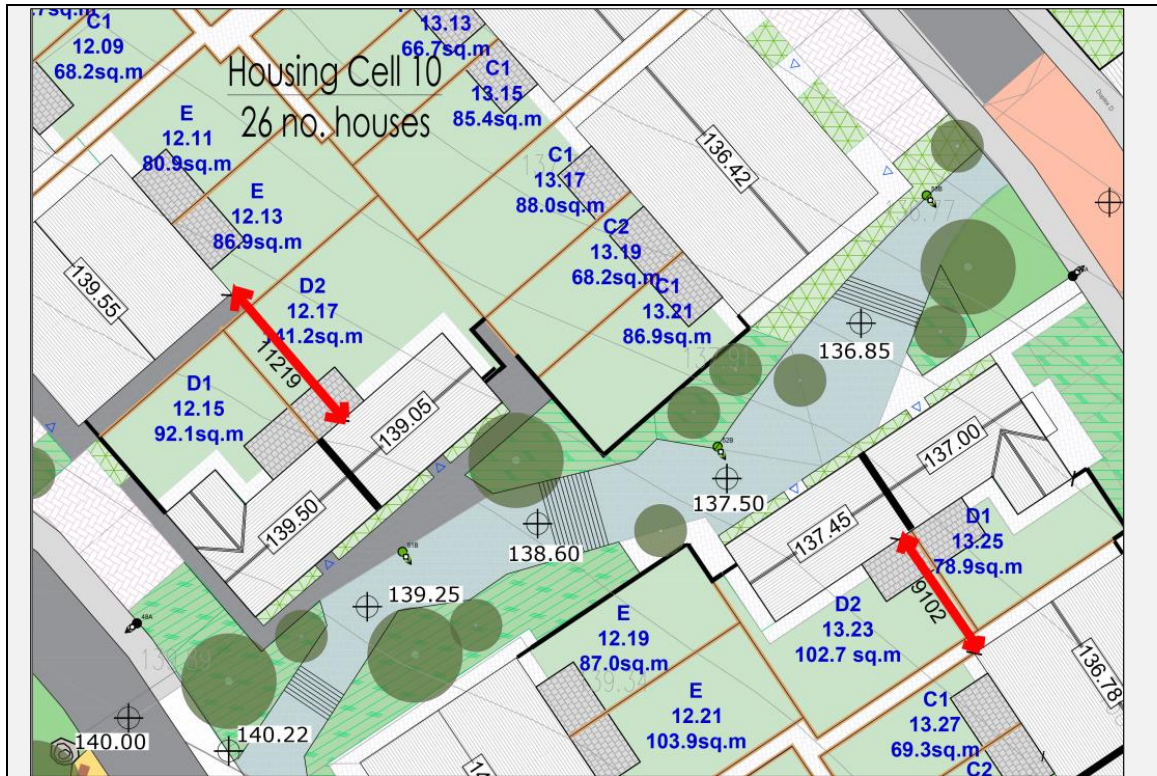


Figure 6.2: Diagram showing reduced distances to wide fronted house types

(Source: McCrossan O'Rourke Manning Architects, 2022)

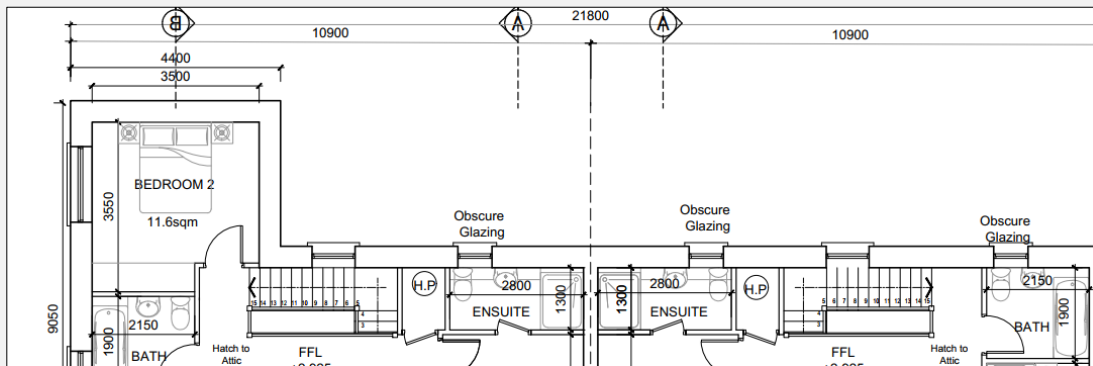


Figure 6.3: Extract from Dwg. No. PL313 Demonstrating Obscure Windows Provided

(Source: Dwg No. PL313, McCrossan O'Rourke Manning Architects, 2022)

Private rear gardens comply with the *Development Plan* guidelines in all cases. Separation distances between the units and the site boundary are carefully considered and where appropriate, windows are opaque to prevent overlooking of adjacent dwellings i.e. as shown in Figure 6.3 where obscure glazing is provided to bathrooms.

In relation to Duplex Block D in proximity to the neighbouring 5 No. dwellings in Rockville (DLR Reg. Ref. D18A/0566), there is just 1 No. dwelling that is located 'opposite' a neighbouring dwelling. In this instance, there are no windows on the first and second floor of the proposed duplex unit and thus a reduced separation distance is proposed. In relation to Apartment Blocks C and D, there are reduced separation distances provided to the boundary, however there are mostly car parking spaces and streets located in the neighbouring Rockville

development (DLR Reg. Ref. D17A/0793). There is a pinch point at the location of the existing apartment block in the neighbouring Rockville development however this recently developed block is built very close to the application site boundary and in this instance, it would be difficult to achieve the 22 metre separation distance with any development on the subject site. The proposed development provides a separation distance of c. 11.9 metres to the existing apartment block which is considered acceptable in the interests of sustainably developing these serviced lands. Please see MCORM's architectural drawing pack for further details. The scheme is in accordance with the *Sustainable Residential Development Guidelines 2009* which 'normally' recommends 22 metres separation distances but allows 'flexibility'.

There are 10 No. high-level aims set out in the document, which are set out and responded to below:

- 1) Prioritise walking, cycling and public transport, and minimise the need to use cars;

The scheme promotes sustainable modes of transport by providing 536 No. bicycle parking spaces and encouraging public transport, walking and cycling. In addition, some 73 No. electric vehicle spaces and 1 No. car share parking space will be provided.

- 2) Deliver a quality-of-life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;

The development will provide high-quality units with large areas of public open space, communal open space, commercial units and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road, which is soon to be constructed. All houses and duplexes are dual aspect and 69% of the apartments will be dual aspect units.

The development promotes safety and facilitates the natural surveillance of adjoining routes and spaces as all open spaces are overlooked by apartments. The site is located in the centre of Kiltarnan Village and is thus an ideal and convenient location for residential development.

- 3) Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;

A 'Social Infrastructure Audit' has been prepared by KPMG Future Analytics and is enclosed as a separate document. This Audit demonstrates that a significant range of services and facilities are available in proximity to the site 'which contribute to quality of life'. The Social Infrastructure Audit did not identify a need to provide specific facilities at the subject site. The proposed development includes a crèche and community centre which will enhance the service provision in Kiltarnan.

- 4) Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;

A detailed Design Statement has been submitted with this planning application and sets out the following:

'...Depending upon the character areas within the site the materials vary. Between character areas there will be distinct differences between brick types and material choice, elevation treatment and building form in order to create variety and visual interest across the scheme.

...The proposed buildings employ a controlled palette of materials with a mix of traditional and contemporary typologies. The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.

...Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.

...The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development.'

The scheme will enhance Kiltiernan Village and will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm.

- 5) Are easy to access for all and to find one's way around;

This development will be easy to navigate and will also enhance legibility and permeability for the wider area, especially due to the provision of a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road. Access to the units and public and communal open space within the site will also be easy to navigate with clear pathways provided for example.

- 6) Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;

The proposed development represents the sustainable and efficient development of underutilised land in Kiltiernan Village. An Energy Statement has been prepared by Waterman-Moylan and is enclosed with this application.

- 7) Provide a mix of land uses to minimise transport demand;

The development principally provides residential units with a Neighbourhood Centre including medical, office, retail, convenience retail and a community facility, in addition to public and communal open spaces. The development promotes sustainable modes of transport and promotes walking and cycling from the site particularly due to the provision of a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road and pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" development to the north-east. In addition, some 536 No. bicycle parking spaces are proposed. Therefore, the development encourages sustainable modes of transport which will minimise car usage.

- 8) Promote social integration and provide accommodation for a diverse range of household types and age groups;

The development promotes social integration with the range of public and communal open spaces provided and commercial units proposed. The mix of 1, 2, 3 and 4 No. bedroom units will add diversity to the existing unit provision in the area. Some 39 No. Part V units are provided in accordance with Part V of the *Planning and Development Act 2000 (as amended)*, which requires 10% social and affordable housing for the subject development.

- 9) Enhance and protect the green infrastructure and biodiversity; and

The development will enhance and contribute to the green infrastructure and biodiversity of the area. The scheme will provide a planting scheme that includes a range of pollinator-friendly species to encourage biodiversity. In addition, as set out in the Landscape Rationale by Ronan MacDiarmada & Associates Landscape Architects & Consultants, some 659 No. tree species have been proposed and will improve biodiversity whilst also providing aesthetic and/or functional characteristics.

- 10) Enhance and protect the built and natural heritage.

The proposed scheme will enhance the natural and built heritage of the site, due the high quality design proposed, in addition to the provision of public and communal open spaces. The site will enhance the visual amenity of the area and will be a positive insertion to the area on a site that currently represents a significant underutilisation of scarce urban land.

The *Urban Design Manual – A Best Practice Guide (2009)* is a companion document to the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*.

The *Urban Design Manual* sets out 12 No. key indicators for developments in urban areas:

- 1) Context – How does the development respond to its surroundings?

The proposed development has been subject to a high-quality design by MCORM Architects.

In our opinion, the height and density provided in the subject development is appropriate having regard to the express requirement in National level policy to achieve compact growth, Although the height (on parts of the site) and the density will increase from the very low immediate context of older Kiltarnan development, it has been provided in an appropriate transitional manner between existing lower scaled developments in the area to the newer higher density schemes.

The scheme appropriately responds to its surroundings by providing permeable links through the site. The site will be opened up onto the Enniskerry Road and the provision of a Neighbourhood Centre and Village Green will positively contribute to Kiltarnan Village.

The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context.

Please refer to the Architectural Design Statement prepared by MCORM Architects and a Landscape Rationale by Ronan Mac Diarmada & Associates Landscape Architects & Consultants enclosed for more details.

2) Connections – How well connected is the new neighbourhood?

The subject site is located within the heart of Kiltarnan and the development will fill in a gap between Rockville and Enniskerry Road. Therefore, the proposed development will contribute towards the consolidation of Kiltarnan Village. Please see enclosed Landscape Rationale prepared by RMDA Landscape Architects, which demonstrates linkages to surrounding developments, i.e. Rockville and the future Glenamuck Link Distributor Road in particular, and Enniskerry Road/Glenamuck Road. The scheme will improve pedestrian facilities along Enniskerry Road by narrowing the carriageway and creating an additional 2 metre footpath/verge. The Neighbourhood Centre and Village Green will enhance the streetscape along Enniskerry Road and will provide a meeting point for the community.

The proposed development will thus have strong connections to surrounding developments and the wider area.

3) Inclusivity – How easily can people use and access the development?

As previously noted, the proposed development has been designed to encourage sustainable modes of transport such as cycling and walking through the site.

The access points from Enniskerry Road and Glenamuck Road, link through to Rockville, link to the future GLDR and the Dingle Way ensures that the scheme can be easily accessed. The Neighbourhood Centre will be easily accessible from Enniskerry Road. The scheme also includes 536 No. bicycle parking spaces to encourage cycling to and from the subject development.

4) Variety – How does the development promote a good mix of activities?

The proposed development will consist of 383 No. residential units comprising 165 No. houses, 118 No. duplex units and 100 No. apartments. The scheme also proposes a Neighbourhood Centre comprising retail (857 sq m), convenience retail (431 sq m), office (317 sq m), medical (147 sq m), crèche (439 sq m) and a community facility (321 sq m).

We note the development is supported by the provision of 2,934 sq m of communal open space and 18,879 sq m public open space. Permeable connections are also provided through and within the site.

The proposed scheme has been designed ensuring that a wide variety of amenities and facilities are available for future residents and the public to utilise within the development.

5) Efficiency – How does the development make appropriate use of resources, including land?

National policy expressly seeks the densification of underutilised lands such as the subject site. The site is located close in the Village Centre and is close to employment, public transport, services and facilities and the subject scheme, which includes residential units and a Neighbourhood Centre, can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in Dublin.

The proposed scheme has a gross developable site area of 10.8 Ha and a net site area of 8.6 Ha, which results in a gross density of 35.5 units per hectare and a net density of 44.5 units per hectare, which represents an efficient densification of outer suburban lands.

The proposed development is consistent with the zoning as set out in the *Dún Laoghaire Rathdown County Development Plan 2022-2028* which includes residential units and the commercial units as permissible or open for consideration uses. The proposed development represents the appropriate densification of this underutilised site while having regard to the need to protect the amenity of surrounding properties. The proposed scheme provides high quality landscaped areas, which will provide amenity and biodiversity.

6) Distinctiveness – How do the proposals create a sense of place?

The scheme provides high-quality public and communal open spaces, which will allow the public and residents to enjoy high-quality landscaped outdoor spaces. The permeable connections through and within the site and the provision of a Neighbourhood Centre and Village Green in particular will all contribute towards creating a sense of place within the village.

7) Layout – How does the proposal create people friendly streets and spaces?

There will be limited vehicular activity within the subject scheme which provides a public realm that prioritises ease of movement for pedestrians and bikes.

In addition to the private amenity spaces serving individual units and the communal amenity space, 18,879 sq m of public open space is provided (17.5% of the overall developable site) which is in excess of the 15% requirement outlined in the *Development Plan*.

Section 5.3 'DMURS' of the enclosed *Traffic and Transport Assessment* by Atkins, sets out the following in relation to people friendly streets and spaces:

'The street layouts have been developed to deliver a high place function wherein the streets and open spaces form part of the social fabric and are used for congregation and play. Achievement of this function can be greatly facilitated by developing a self-regulating street environment wherein vehicular movement function should be limited, as much as is practicable and a desirable maximum design speed of 20kph being achieved.

The street layout accommodates high levels of permeability for pedestrians and cyclists along streets and through open spaces, and onto Enniskerry Road and Glenamuck Road. Vehicular permeability has been predominantly limited to local access only, predominantly for residents with appropriate access provision for emergency and service vehicles.

All streets have been designed in the context of achieving a shared street provision in the street carriageway, per the National Cycle Manual, wherein the road space is shared between cyclists and vehicles based on low traffic low speed street environments. The side of the street remains the preserve of the pedestrian on the footway. Paramount to achieving this outcome is significantly limiting vehicle volumes and achieving, by design, a self-regulating desirable maximum speed of 20kph.

The design of the streetscape including the provision of car parking will significantly influence the achievement of lower traffic speeds and the required quality of street design.'

Therefore, it is clear that the scheme has focussed on the creation of people friendly streets and spaces.

8) Public Realm – How safe, secure and enjoyable are the public areas?

The outdoor spaces will be subject to a high level of passive surveillance as they will be overlooked by the residential units and/or the Neighbourhood Centre, ensuring that these areas are safe and secure. The Village Green will provide a new area for the residents of the subject scheme and wider community to enjoy. The open spaces will include play spaces for children and toddlers.

The proposed development includes a comprehensive Landscape Plan and Landscape Rationale prepared by RMDA.

9) Adaptability – How will the buildings cope with change?

The ground floor level units within the proposed development have been designed to ensure future capability of internal modification where deemed necessary as per SPPR 5 of the *Apartment Guidelines, 2020*. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications. The ground floor of the Neighbourhood Centre is also provided with larger floor to ceiling heights to accommodate the proposed commercial units, and can facilitate any required adaption of these uses in the future.

10) Privacy and Amenity – How does the scheme provide a decent standard of amenity?

Each of the 383 No. residential units within the subject scheme have been provided with private open space in the form of balconies, terraces or gardens. We note that all houses and duplexes will be dual aspect and 69% of the apartments are dual aspect.

The *Dún Laoghaire Rathdown County Development Plan 2022-2028* requires 15% of the total site area as public open space. The subject scheme includes the provision of 18,879 sq m of public open space, which equates to 17.5% of the subject developable site.

In addition, the subject scheme provides 2,934 sq m of communal open space.

The proposed scheme provides for a high-quality mixed-use development which also includes permeable links as described throughout this report.

11) Parking – How will the parking be secure and attractive?

The residential car parking will be provided adjacent to the houses or duplexes which will be safe, attractive and accessible for residents to utilise. In relation to the apartment blocks, the parking spaces will be provided under a podium and thus will be secure.

The car parking includes 16 No. mobility impaired spaces, 73 No. electric vehicle spaces and 1 No. car share space.

Bicycle parking for the houses will be provided within the curtilage of the dwellings and there are 536 No. bicycle parking spaces provided for the apartments, duplexes and visitors which are provided throughout the scheme.

12) Detailed Design: How well thought through is the building and landscape design?

An Architectural Design Statement prepared by MCORM Architects and Landscape Rationale by RMDA are submitted as part of this planning application, which sets out the design rationale of the proposed development providing a high-quality innovative scheme.

The assessment of the proposed development above and in the context of the expert reports referred to demonstrates that the proposal is consistent with the guidance as set out in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* and the *Urban Design Manual – A Best Practice Guide (2009)*.

6.9 **Retail Planning Guidelines for Planning Authorities (2012)**

The subject site includes a 'Neighbourhood Centre' designation as denoted on the zoning map of the *Development Plan*.

The *Retail Planning Guidelines for Planning Authorities (2012)* ("*Retail Planning Guidelines*") notes the following definitions in relation to Neighbourhood Centres:

'Local Centre or Neighbourhood Centre

Comprise a small group of shops, typically comprising newsagent, small supermarket/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population...

Centre

For the purposes of these guidelines, a centre refers to a city or town centre and can also, refer to the centre of a district or neighbourhood centre which has been identified in the settlement hierarchy of a development plan'

Section 4.11.6 'Local Retail Units' of the *Retail Planning Guidelines* states the:

'Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.'

The proposed development includes a Neighbourhood Centre, which is provided in the centre of the village on appropriately zoned lands, providing a range of services to serve the

surrounding area including creche (439 sq m), office (317 sq m), medical (147 sq m), retail (857 sq m), retail convenience retail (431 sq m) and a community facility (321 sq m). This will perform an important function in the area in accordance with Section 4.11.6 of the *Retail Planning Guidelines*. The services provided within the Neighbourhood Centre will care for the elderly, persons with mobility impairments, families with small children and those without access to private transport.

In addition, a *Social Infrastructure Audit and Retail Services Assessment* has been prepared by KPMG Future Analytics. The Report notes:

'The subject proposal includes the provision of a neighbourhood centre (c.2,512 sqm) comprising retail space (c.431 sqm convenience and 857 sqm retail), office space (c.317 sqm), a medical facility (c.147 sqm), a community facility (c.321 sqm) and a creche (c.439 sqm). The size provided for the neighbourhood centre (which has a combined retail floor area of 1,288 sq m, an increase of 564 sq m since the tripartite meeting during Stage 2) in conjunction with the existing and pipeline retail facilities is sufficient to cater for additional demand generated by the proposed scheme...'

The Report details nearby commercial floorspace with a focus on Belarmine Plaza and Aiken's Village, given their proximity to the subject proposal. The assessment details the retail floor space provided per person in these locations in addition to the current vacancy levels, which is currently over 50%. The Report further notes that shopping behaviours have changed and the *'retail landscape is facing a new reality as one of the sectors most disrupted by the global pandemic'*.

It is considered that the provision of non-residential floorspace in the proposed Neighbourhood Centre is appropriate and will adequately serve the serve the existing and future population in the Kiltarnan area without causing concern in relation to the potential for significant vacancies in the proposed units given the challenging retail environment. Overall, the additional services provided within the Neighbourhood Centre will be an significant benefit for the future residents of the proposed development and the wider Kiltarnan community.

6.10 *Design Manual for Urban Roads and Streets (2019)*

The *Design Manual for Urban Roads and Streets (2019)* ('DMURS') sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. *DMURS* outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

6.10.1 Policy Background

DMURS references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

- (i) *'To reduce overall travel demand;*

- (ii) *To maximise the efficiency of the transport network;*
- (iii) *To reduce reliance on fossil fuels;*
- (iv) *To reduce transport emissions; and*
- (v) *To improve accessibility to public transport’.*

The scheme promotes sustainable modes of transport through its sustainable locations the core of Kiltiernan Village and through the provision of permeable links such as the Dingle Way and linkages to surrounding developments etc.

The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future a New Transport Policy for Ireland 2009 – 2020*.

6.10.2 Site Layout and Legibility

The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area and will open up the site to serve the local community. The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space in addition to a Neighbourhood Centre and Village Green.

The proposed high-quality designed layout of the scheme by MCORM Architects will ensure that the scheme will sit comfortably within its immediate context through a modulation of scale and character throughout the site, and will make a positive contribution to legibility and permeability for Kiltiernan. We note that the development has been designed in accordance with DMURS, as demonstrated in the enclosed *Traffic and Transport Assessment* prepared by Atkins.

6.10.3 Sustainable Transport

The subject site is considered eminently suitable for development given the site's location in the heart of Kiltiernan Village. Permission has been granted for other residential developments in Kiltiernan and it is considered that the subject site is even more sustainable than some of the granted development sites due to its location in the centre of the village.

The DMURS publication references that the Smart Travel document includes a '*vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips.*'

The proposed scheme provides for 536 No. bicycle parking spaces for the apartments/duplexes ensuring that sustainable modes of transport are encouraged. In addition, the houses will store bicycles in curtilage.

As established in the above commentary, it has been demonstrated that the proposed mixed-use scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2019)*.

The *Traffic and Transportation Assessment* prepared by Atkins notes the scheme's compliance with DMURS and sets out specific attributes of the scheme design which contribute to achieving this DMURS objective.

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

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The *Site Specific Flood Risk Assessment* by Roger Mullarkey and Associates concludes the following key points:

'As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.

In accordance with the above noted Guidelines, a sequential staged approach was adopted in assessing the flood risk for the subject development.

It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.

It is concluded that a mixed residential and commercial development is appropriate on the subject lands.

It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.

Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding.'

Thus, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

6.12 *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016*

The *Guidelines for Planning Authorities on Childcare Facilities (2001)* (“*Childcare Guidelines, 2001*”) sets out that:

‘Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate.’

The *Childcare Guidelines, 2001* further state:

‘The Planning and Development Act, 2000, makes it a mandatory requirement on planning authorities to include in their Development Plan objectives on the provision of services for the community, including creches and other childcare facilities.’

The objectives of the *Childcare Guidelines, 2001* are to:

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
 - Residential areas;
 - Places of employment;
 - Educational establishments;
 - City and town centres, neighborhood and district centres;
 - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

The *Childcare Guidelines, 2001* identify appropriate locations for childcare facilities as identified below:

- New communities/Larger new housing developments - *‘Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.’*
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working – *facilitating safe and efficient journeys to/from the workplace of parents/guardians.*
- In the vicinity of schools – facilitating parents dropping off school-going children and children attending childcare facilities on route to their place of employment;
- Neighbourhood, District and Town Centres – combating competitive pressure from larger commercial areas.
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.

The *Childcare Guidelines, 2001* stipulate that Planning Authorities should require one childcare facility (providing for a minimum 20 childcare places) per approximately 75 No. dwellings. However as noted above, a childcare facility does not need to be provided if there are significant reasons relating to the development consisting of single bed apartments or where adequate childcare facilities exist in adjoining developments. It is also noted that the *Apartment Guidelines, 2020* state the following:

'One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.'

The *Social Infrastructure Audit and Retail Services Assessment* prepared by KPMG Future Analytics enclosed separately concludes that the provision of a creche within the scheme with a capacity to accommodate more than 100 No. children will be a welcome provision for the area and will accommodate any future (and excess) demand within the development and study area.

The proposed development will provide a creche (439 sq m) within the ground floor of the Neighbourhood Centre and will cater for c. 95 No. children. This crèche will contain 7 No. classrooms and includes a dedicated open space area for staff and children to utilise. The *Child Care Act 1991 (Early Years Services) Regulations 2016* sets out the following floor area requirements, which the subject proposed creche fully complies with:

(1)	(2) AGE RANGE	(3) CLEAR FLOOR SPACE
1.	0-1 year	3.5 square metres
2.	1 — 2 years	2.8 square metres
3.	2 — 3 years	2.35 square metres
4.	3 — 6 years	2.3 square metres

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

7.0 STATEMENT OF CONSISTENCY - REGIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*.

7.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* ("RPGs") provides a long-term sustainable planning framework for the GDA. The RPGs is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term.

The RPGs set out that '*quality housing should be reflected equally in terms of the overall layout of the scheme and its urban design characteristics, the internal layout, form and design of housing and the external architectural form of housing which should relate to the wider urban area of which it is part while facilitating the creation of areas of distinct character.*'

In relation to Dublin, the RPGs states that:

'A core element of the RPGs is the importance of integration of land use, employment and transport. Within the City, as the national hub of employment and transport, it is critical that the policy of encouraging high quality new housing within the core of the gateway continues. The City, with a large young population inflated by students, migration and a young mobile workforce, has lower occupancy rates, particularly in the inner City which drives higher housing demand per head of new population. The importance of the detailed urban plans and guidelines in setting clearly the template for successful infill and regeneration development needs to continue, taking the long term perspective. New transport hubs at metro stations and along the interconnector route line give these locations high accessibility and mobility and this needs to be capitalised on where possible.'

The following Strategic Policies are considered relevant and have been assessed in respect of the proposed development:

Strategic Policy EP1 outlines the importance of the integration of climate change considerations into Development Plans, Flood Risk Assessments and Biodiversity and Heritage plans.

The proposed development has had due regard to climate change, flood risk and biodiversity.

An *Environmental Impact Assessment Report* has been prepared by Enviroguide Consulting including a Biodiversity Chapter prepared by Scott Cawley Limited, in addition to a *Site Specific Flood Risk Assessment* prepared by Roger Mullarkey and Associates, an *Appropriate Assessment Screening* prepared by Scott Cawley and an *Energy Statement* prepared by Waterman Moylan are included with this submission.

The enclosed technical reports demonstrate that the proposed development is consistent with Strategic Policy EP1.

Strategic Policy EP2 refers to the need to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long-distance commuting.

The proposed development will facilitate new employment opportunities for the local community particularly due to the newly proposed Neighbourhood Centre.

The provision of high-quality homes and a range of tenures in Kilternan will also allow employees to live closer to their place of work and reduce commuting distances and will allow new employers to have confidence that adequate residential development is available for their employees.

Therefore, the proposal is consistent with Strategic Policy EP2.

Strategic Policy SP1 stipulates that the delivery of new housing in the GDA shall support the NSS, Smarter Travel and the DoEHLG Guidelines on Sustainable Residential Development. The RPG Settlement Strategy encourages the focusing of new housing development on:

- (i) consolidation within existing built footprint with particular focus on the metropolitan area;
- (ii) supporting the achievement of sustainable towns;
- (iii) supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of land use and high quality public transport provision, and
- (i) build up economics of scale for services in identified growth towns.

The proposed scheme will positively address each of the criteria above where relevant.

The subject development will:

- Provide residential units within Dublin, which represents its consolidation within the existing urban footprint;
- Represent the sustainable development of the urban village of Kilternan; and
- Provide residential units in a prime village location proximate to public transport, to be improved in the coming years.

The subject lands are located in a sustainable location and will promote the increase in population in the heart of Kilternan Village.

The scheme is considered to be consistent with Strategic Policy SP1.

Strategic Policy PIP5 relates to waste management and aims to ensure environmental, business and public health needs are met. It also sets out to promote and facilitate reuse and recycling.

An Outline Operational Waste Management Plan (OWMP), Construction Environment Management Plan (CEMP) and Construction and Demolition Waste Management Plan (CDWMP) have been prepared by Enviroguide Consulting and are included as part of the EIAR. These reports set out the waste management strategy for the subject site.

The proposal is therefore consistent with Strategic Policy PIP5.

Strategic Policy GIP1 is concerned with the protection of built heritage and protected species.

An Appropriate Assessment Screening Report and full Environmental Impact Assessment Report are enclosed. The Appropriate Assessment Screening Report concludes that on the basis of best scientific knowledge, and applying the precautionary principle:

'it can be concluded that the possibility of any significant effects on any European sites, in the absence of mitigation, whether arising from the proposed development alone or in combination with other plans and projects, can be excluded... In reaching this conclusion, the nature of the works and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.'

A Biodiversity Chapter also forms part of the Environmental Impact Assessment Report enclosed.

The proposal is consistent with Strategic Policy GIP1.

Strategic Policy GIP2 aims to protect and conserve the natural environment, in particular EU designated sites.

The subject site is not located on or adjacent to any EU designated sites. As noted above in response to GIP1, the Appropriate Assessment Screening Report concludes that on the basis of best scientific knowledge, and applying the precautionary principle, possibility of any significant effects on any European sites, in the absence of mitigation, whether arising from the proposed development alone or in combination with other plans and projects, can be excluded.

The proposal is therefore consistent with Strategic Policy GIP2.

Strategic Policy GIP6 sets out to ensure the protection, enhancement and maintenance of the natural environment with specific emphasis on the value of green spaces.

See response to Policy GIP1 and GIP2 above. In addition, we note that the scheme includes significant tracts of open spaces, a tree lined avenue and permeable connections which will emphasise the value of green space on site.

The proposed scheme has been designed with due regard for the natural environment, the value of green space and the strategic green network. Outdoor public open space, communal open spaces, balconies and green roofs have been provided. A comprehensive Landscape Rationale prepared by RMDA Landscape Architecture is submitted in conjunction with this planning application. A Biodiversity Chapter also forms part of the Environmental Impact Assessment Report enclosed.

The proposal is consistent with Strategic Policy GIP6.

Strategic Policy SIP1 is in relation to planning for communities and outlines the need to identify and respond to the most vulnerable in planning for growth, for change or regeneration.

The proposed scheme is a direct response to the deficit in housing supply in Dublin and will contribute towards addressing the national housing crisis by providing a mix of 1, 2, 3 and 4 No. bedroom units. It is also noted that 39 No. Part V units will be provided as per Part V of the *Planning and Development Act, 2000*.

As previously outlined, the scheme will contribute positively towards addressing the needs of the future residents and the local community through the inclusion of a range of dwelling types and sizes, high-quality public and communal open spaces, permeable links and a Neighbourhood Centre that will enhance the quality of life for future residents and the local community. The opening up of the site will also positively contribute to the local area by improving legibility for the community.

The proposal is consistent with Strategic Policy SIP1.

Strategic Policy SIP2 acknowledges planning policy as a tool in creating a quality of life.

The subject scheme includes 383 No. residential units, a Neighbourhood Centre and a range of high-quality public and communal open spaces have been proposed to cater for the recreational and amenity requirements of future residents and for the wider community, especially through the provision of a Village Green and the Dingle Way on the subject lands, amongst other public spaces. The open spaces have been developed with proposed extensive path systems that are organic in style.

It is therefore considered that the proposal will provide for a high-quality standard of residential amenity for the future occupiers and wider community. The sustainable location will reduce commuting times, in addition to the provision of open spaces and the promotion of public transport, walking and cycling as main modes of transport which will contribute to the quality of life of residents within the proposed development in proximity to a range of services and facilities.

The proposal is consistent with Strategic Policy SIP2.

Strategic Policy FP1 states that flood risk requires active management throughout the planning process.

The *Site Specific Flood Risk Assessment* by Roger Mullarkey and Associates concludes the following key points:

'As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.

In accordance with the above noted Guidelines, a sequential staged approach was adopted in assessing the flood risk for the subject development.

It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.

It is concluded that a mixed residential and commercial development is appropriate on the subject lands.

It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.

Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding.'

The proposal is consistent with Strategic Policy FP1.

This section has clearly demonstrated that the proposed development comprising 383 No. residential units (27 No. 1 bed units, 128 No. 2 bed units, 171 No. 3 bed units and 57 No. 4 bed units) and a new Neighbourhood Centre is consistent with the relevant strategic policies set out the *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022*.

7.2 **Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031**

The *Regional Spatial and Economic Strategy* ("RSES") for the Eastern and Midlands Regional Assembly comprises a number of core Regional Policy Objectives which coincide with the National Planning Framework ("NPF"). The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

The RSES includes various Regional Policy Objectives ("RPO") and the relevant RPOs are discussed in this section.

Under RPO 4.3, 'Consolidation and Re-intensification' the following objective is stated:

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

The subject scheme will provide 383 No. residential units and a Neighbourhood Centre at an underutilised strategic site in the centre of Kiltarnan Village, in accordance with RPO 4.3. In addition, as noted earlier in this report, it is expected that the GDRS will have completed construction in Q3/Q4 2024 and the first phase of the proposed development is predicted to be fully constructed in September 2024. The scheme has allowed for and considered the future GLDR (part of the GDRS) along the north-eastern boundary of the site. Bus Connects improvements will also be delivered in the Village. It is our opinion that the development will result in the appropriate intensification of this sustainable core village site.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES states the following:

- RPO 5.4: 'Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in

the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines', and 'Urban Development and Building Heights Guidelines for Planning Authorities'.

As stated previously in this Statement, the proposed development fully responds to the National Planning Policy, in particular Section 6.6 - *Sustainable Urban Housing; Design Standards for New Apartments' Guidelines* and Section 6.5 - *Urban Development and Building Heights Guidelines for Planning Authorities*.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES notes the following objective RPO 5.5:

'Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.'

The subject site is contained within an established neighbourhood in Kiltiernan Village.

It is our professional opinion that the proposed development provides an appropriate design response that will consolidate and contribute to the surrounding residential land uses as per RPO 5.5. The proposed development represents consolidated growth on an underutilised site in a prominent and growing area of County Dublin.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'* [Our Emphasis]

The proposed development is located on appropriately positioned lands in the heart of Kiltiernan Village.

The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in the village centre preventing urban sprawl. Appropriately located residential accommodation within Dublin is important to the continued growth and maintenance of Ireland's response to the evolving needs of the modern, mobile workforce.

Under Section 8.1 the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

The subject development contributes to consolidated growth and the reduction in carbon emissions as it seeks to encourage future residents to avail of sustainable modes of transport through the provision of permeable links through the site and the provision of 536 No. bicycle parking spaces for example.

The proposed landscaping and planting will help maintain a high standard of natural and green infrastructure within an intensified and more dense mixed-use setting. The open spaces provided within the development will also significantly enhance the green infrastructure of the area.

Therefore, the subject development contributes to consolidated growth, towards the reduction in carbon emissions and represents a sustainable settlement pattern and is thus in accordance with Section 8.1.

Under Section 8.2, the RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework **to promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'* [Our Emphasis]

The subject development seeks to provide a sustainable mixed-use development, which is well located in the centre of Kiltiernan Village.

The development promotes compact growth in accordance with Section 8.2, especially as there are some recently granted developments in Kiltiernan, that are located further from the Village Core.

Additionally, the provision of open spaces and a Neighbourhood Centre aides in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community.

The RSES Objective RPO 9.4 states that in relation to new apartment developments:

*'Design standards for new apartment developments **should encourage a wider demographic profile which actively includes families and an ageing population.**'* [Our Emphasis]

It is our opinion that there is a significant opportunity to densify this site with a mix of one, two, three and four bedroom units, which will appropriately serve the demographic profile of the area, and as such the scheme will cater for a wide cohort of persons.



Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant Regional Policy Documents.

8.0 STATEMENT OF CONSISTENCY - LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy as set out within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* ("Development Plan") and the *Kiltiernan Local Area Plan 2013-2019 [extended to September 2023]* ("Kiltiernan LAP").

8.1 *Dún Laoghaire-Rathdown County Development Plan 2022-2028*

8.1.1 Core Strategy

The Core Strategy Map outlined in Figure 2.9 of the *Development Plan* demonstrates that Kiltiernan is designated as a 'New Residential Community':

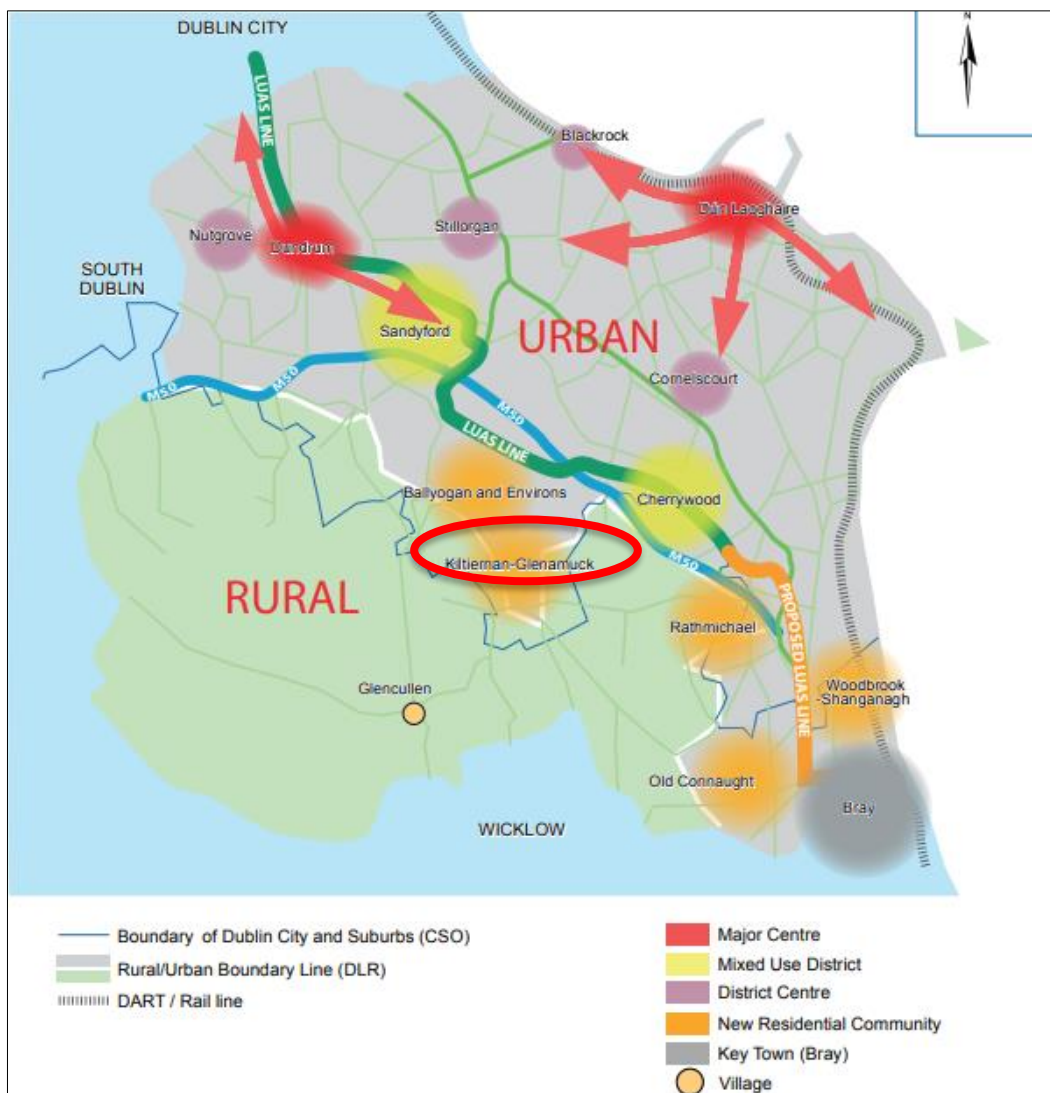


Figure 8.1: Core Strategy Map of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* (Figure 2.9) with Kiltiernan Circled in Red

(Source: Figure 2.9 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2022)

Therefore, the proposed development of 383 No. residential units and a Neighbourhood Centre reflects the aspirations set out in the Core Strategy Map by providing a new residential community within Kilternan Village. The proposed scheme provides a sustainable solution for the growing population, by providing a medium-density development on a strategic site within a growing and vibrant suburban village.

8.1.2 Zoning

The subject site is zoned as both 'Objective A' and 'Objective NC' in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, where the stated objectives are:

1. Objective A: *'To provide residential development and improve residential amenity while protecting the existing residential amenities.'*
2. Objective NC: *'To protect, provide for and/or improve mixed-use neighbourhood centre facilities.'*

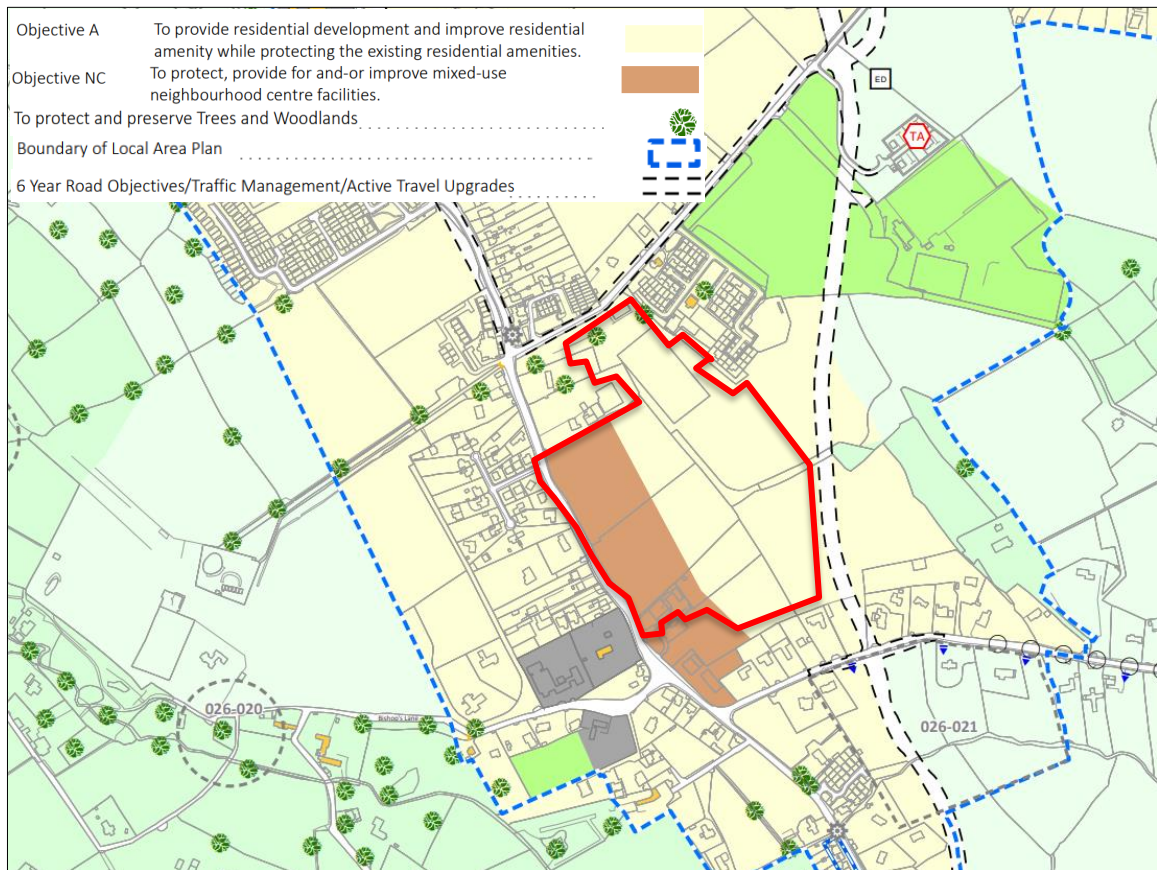


Figure 8.2: Zoning of the Subject Developable Site (Indicatively Outlined in Red)

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2022)

The proposed development includes the following uses which are all either permitted in principle or open for consideration under the zoning objectives:

- 383 No. residential units

- Retail (857 sq m)
- Retail (convenience) (431 sq m)
- Creche (439 sq m)
- Office (317 sq m)
- Medical (147 sq m)
- Community Facility (321 sq m)

Table 13.1.2

ZONING OBJECTIVE 'A'
To provide residential development and improve residential amenity while protecting the existing residential amenities.
Permitted in Principle
Assisted Living Accommodation, Community Facility ^a , Childcare Service ^a , Doctor/Dentist etc. ^a , Education ^a , Health Centre/ Healthcare Facility ^a , Open Space, Public Services, Residential, Residential Institution, Travellers Accommodation.
Open For Consideration
Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark ^b , Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry ^c , Offices less than 200sq.m. ^c , Offices in excess of 200 sq.m. ^d , Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery.
a: Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'.
b: Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.
c: less than 200sq.m.
d: Only applies to A zoned lands subject to Specific Local Objective 122.

Table 13.1.12

ZONING OBJECTIVE 'NC'
'To protect, provide for and/or improve mixed-use neighbourhood centre facilities'.
Permitted In Principle
Advertisements and Advertising Structures, Assisted Living Accommodation, Betting Office, Carpark, Community Facility, Craft Centre/Craft Shop, Childcare Service, Civic Use Cultural Use, Doctor/ Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre / Healthcare Facility, Offices less than 300 sq.m., Open Space, Public House, Public Services, Residential, Residential Institution, Restaurant, Service Garage, Shop-Neighbourhood, Sports Facility, Tea Room/ Café, Veterinary Surgery.
Open For Consideration
Aparthotel, Cash and Carry/Wholesale Outlet, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Motor Sales Outlet, Nightclub, Off-License, Office Based Industry, Offices over 300 sq.m, Place of Public Worship, Residential – Build to Rent ^a , Service Station, Shop-Specialis, Shop District, Student Accommodation ^a , Travellers Accommodation.
a: Subject to retaining an appropriate mix of uses.

Please see summary table below which details the location of each proposed use in relation to the zoning applicable to the subject lands:

- Proposed on Neighbourhood Centre zoned lands 'Objective NC':

Residential	Permitted in Principle
Retail (857 sq m) Retail (convenience) (431 sq m)	Shop-Neighbourhood = Permitted in Principle Shop-Specialist = Open for Consideration Shop-District = Open for Consideration
Office 119 sq m	Offices less than 300 sq m = Permitted in Principle Offices over 300 sq m = Open for consideration
Community Facility (321 sq m)	Permitted in Principle

- Proposed on Residential zoned lands 'Objective A':

Residential	Permitted in Principle
Creche (439 sq m)	Permitted in Principle (Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities')
Medical (147 sq m)	Doctor/Dentist etc. = Permitted in Principle (Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities')
Office (199 sq m)	Office less than 200 sq m = Open for Consideration

The Objective 'A' lands contains residential units and part of the new Neighbourhood Centre including the creche, medical unit and 199 sq m of office which are in accordance with the zoning objective as demonstrated in the table above. The creche and medical unit are permitted in principle *'where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'*.

It is our professional planning opinion that the proposed creche and medical unit will not have an adverse effect on the 'A' zoning objective. In particular, the future residents will have easy access to these services which is a significant benefit for the scheme and for the wider Kiltiernan community. In addition, the office is less than 200 sq m on the 'A' zoned lands which is also considered acceptable. The Objective 'NC' lands contain residential units, and the majority of the new Neighbourhood Centre including the retail, 119 sq m of office and the community facility.

As demonstrated in the table above, the proposed development is fully in accordance with the zoning objectives. The subject scheme will result in the appropriate densification of an key underutilised site in the heart of Kiltiernan Village and the provision of a new Neighbourhood Centre for the Village will positively contribute to the regeneration of the subject site.

As set out in detail further in Section 8.4, the subject site is also located within the *Kiltiernan Local Area Plan 2013-2019* [extended to September 2023] ("*Kiltiernan LAP*"). The *Kiltiernan Neighbourhood Framework Plan 2013*, which is an appendix document to the *Kiltiernan LAP*, sets out the development framework for the Neighbourhood Centre zone:

'Ideally there should be one Neighbourhood Centre to feature as the civic core for the LAP area. The provision of two centres, on opposite sides of Enniskerry Road, somewhat dilutes potential focus. It is intended that the southern-most NC node (Parcel No. 22) will be the primary node.'

'The Framework Plan envisages that the node centred around Our Lady of the Wayside Church will become the primary retail, commercial and community focus for the village, centred on a new 'village green' that will become the heart of the village.'

The proposed development includes a Neighbourhood Centre and is therefore consistent with this development framework.

8.1.3 Compliance with the Development Management Standards of the *Development Plan* (Chapter 12)

Chapter 12 of the *Development Plan* sets out the Development Management Standards for Dún Laoghaire-Rathdown. The relevant standards are extracted and responded to below:

12.2.1.2 Design Statements

A Design Statement which is an outline of the proposal's context and aims, and how it responds to Development Plan objectives and surroundings, should be submitted for all applications of 1000+sq.m. commercial development or applications of 30+ residential units (refer also to Policy Objective PHP44 and Section 12.3.1 below).

A Design Statement prepared by MCORM Architects is included with this planning application. Policy Objective PHP44 and Section 12.3.1 are responded to below.

12.1.1.3 Landscape Plans

Planning applications for 1000+sq.m. commercial development, 10+ residential units, or smaller developments (as deemed appropriate by the Planning Department), should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority).

A Landscape Rationale and Drawings prepared by RMDA Landscape Architects are included with this planning application.

12.1.2.1 Environmental Impact Assessment

All Planning applications undergo EIAR screening or preliminary assessment.

An Environmental Impact Assessment Report is enclosed with this planning application.

12.1.2.2 Appropriate Assessment

Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to Plans and Projects, Appropriate Assessment (AA) is required. If, following screening, it is considered that AA is required, then the proponent of the Plan or Project must prepare a Natura Impact Statement. A Plan or Project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:

- *The Plan or Project will not give rise to significant adverse direct, indirect, or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or*
- *The Plan or Project will have significant adverse effects on the integrity of any European (that does not host a priority natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons of overriding public interest – including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European; or*
- *The Plan or Project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons for overriding public interest - restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European.*

An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited which concludes the following:

'Following an examination, analysis and evaluation of all the relevant information, in view of best scientific knowledge, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, in the absence of mitigation, whether arising from the proposed development alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.3 above. In reaching this conclusion, the nature of the works and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require a Stage 2 Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)'

12.1.2.3 Ecological Impact Assessment

An Ecological Impact Assessment may be required to be submitted with any proposed development should the Planning Authority consider that there is potential to impact upon an environmentally

sensitive area such as a wildlife corridor, a site adjoining or adjacent to a proposed National Heritage Area, along the coastline or a river. The requirement for an ecological impact assessment will be determined on a case by case basis.

An Biodiversity EIAR Chapter has been prepared by Scott Cawley Limited and is enclosed with this planning application.

12.2.1 Built Environment

The Planning Authority will encourage and promote the repair, retrofitting and reuse of buildings in preference to their demolition and reconstruction where possible (Refer also Section 12.3.9 Demolition and Replacement Dwellings). Where this cannot be achieved, the Planning Authority will support the use of sustainably sourced building materials and the reuse of demolition and excavated materials. See also Criteria 5 of the Department of the Environment Heritage and Local Government 'Urban Design Manual' (2009) and Policy Objectives CA6 and CA7.

The Planning Authority will support the use of structural materials that have low to zero embodied energy and CO₂ emissions.

Buildings should be adaptable in design (see Criteria 9 of the 'Urban Design Manual' 2009 in the case of residential developments, Policy Objective CA8: Sustainability in Adaptable Design and Policy Objective PHP19: Existing Housing Stock: Densification and Adaptation). Innovative design and layout which provides natural ventilation incorporating design elements such as brise-soleil, green roofs, green walls and soft landscaping. Landscaping and tree planting will be promoted where feasible to reduce the urban heat island.

An Energy Statement should be included for all applications of 1000+ sq.m. commercial development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered. The planning Authority will support and encourage buildings of innovative design which seek to achieve Passive or Net Zero Carbon design standards.

As set out throughout this report, the existing derelict dwelling known as 'Rockville' and associated derelict outbuildings do not represent an efficient use of sustainable lands and the structures are not of any architectural merit. As shown in the images in Section 5.0, the derelict dwelling and outbuildings are in poor condition and in our opinion, do not possess architectural merit and require demolition in order to provide a high-quality scheme in the heart of Kiltiernan. The development will utilise high-quality, durable and low maintenance materials and the scheme has been assessed against the criteria of the 'Urban Design Manual' (2009) (including Criteria 5 and 9) as detailed in Section 6.8. A response to Policy Objectives CA8 and PHP19 are also included in Section 8.2.4 below. An Energy Statement has also been prepared by Waterman Moylan Consulting Engineers Limited.

12.2.6 Urban Greening

Applicants should explore the potential for urban greening in developments including:

- High quality landscaping (including tree planting), that make use of a diverse range of species of plants – consistent with the National Pollinator Plan, site appropriate and irrigated by rainwater.

- *Incorporating Nature-Based Solutions (NBS) into the design of buildings and layout – living/green walls, living/green and or blue roofs including in the design of small buildings and shelters, other soft Sustainable urban Drainage Systems (SUDS) measures such as swales, rain gardens, using trees for urban cooling and the reduction of wind tunnel effect (Refer also Section 12.8.6). The Council is investigating developing a green factor method through a multi-disciplinary approach as set out in Section 3.4.4 Urban Greening. Data on all surface cover types is required. All applications that submit a stormwater audit shall submit the surface cover types as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).*

RMDA Landscape Architecture have proposed a planting scheme that include pollinator friendly species, which facilitates urban greening at the subject development.

The SUDS features and measures include the use of green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices. In accordance with DLRCC guidelines, green roofs have been favoured and will be provided as follows:

7.1.10 Both Intensive and extensive Green roofs are proposed to Apartment Block C/D and the Neighbourhood Centre (NC). Duplex Block D1 is to have Intensive Green Roof only. The minimum percentage coverage required in Appendix 7.2 of the DLRCC County Development Plan is 50% if extensive and 70% if intensive. Each green roof proposed passes the DLRCC minimum requirement % and is summarised in Table 9 below; plan.

GREEN ROOF COVERAGE SUMMARY							
BLOCK REFERENCE	Extensive	Intensive	Total	Building Footprint	% Coverage of Green Roof	Min.% Reqd.	Pass/Fail DLRCC Min. %
NC	1,568	1,390	2958	4,089	72%	60%*	PASS
Duplex D1		664	664	996	66%	50%	PASS
Apt.Block C/D	1,135	795	1,930	2266	85%	60%*	PASS
*The 60% coverage is an average between the Min.50% if Intensive and 70% if Extensive. Each of the NC and Apt. Blk C/D contain both Intensive & Extensive Green Roofs and therefore the average is taken as the minimum percentage requirement.							

Table 9 - Green Roof Coverage Summary

Figure 8.3: Extract from the Engineering Infrastructure Report & Stormwater Impact Assessment Demonstrating the Green Roof Coverage

(Source: Roger Mullarkey & Associates, 2022)

The Engineering Infrastructure Report and Stormwater Impact Assessment prepared by Roger Mullarkey & Associates includes a table in response to Section 7.1.5 of Appendix 7.

12.3.1 Quality Design

A core aim of land-use planning is to ensure that new residential developments offer a high quality living environment for residents, both in terms of the standard of individual dwelling units and in terms of the overall layout and appearance of streets and outdoor spaces. In considering applications for new developments the Planning Authority will refer to Government guidelines that offer specific guidance in relation to design, including those listed in Appendix 12.

The proposed development will be high-quality in terms of individual living units, overall layout and appearance of streets and outdoor spaces as detailed throughout this Report and the Design Statement. Appendix 13 of the *Development Plan* sets out the principal national, regional and local policy documents, guidelines and plans that have informed the County Development Plan. This Planning Report & Statement of Consistency provides a response to all relevant policy documents, guidelines and plans that are considered applicable to the proposed development.

12.3.1.1 Design Criteria

The objective of DLR County Council is to achieve high standards of design and layout to create liveable neighbourhoods. The following criteria will be taken into account when assessing applications:

[A response is provided underneath each point (in purple text) to each bullet point of the policy (black text)]:

- Land use zoning and specific objectives contained in this Plan and any Strategic Development Zone / Local Area Plan / Urban Framework Plan / non-statutory planning guidance adopted by the Council.

Response: As set out in Section 8.1.2, the proposed development is fully in accordance with the zoning objective pertaining to the subject site.

- Compliance with other policy requirements contained within the Plan.

Response: As set out throughout Section 8.0 of this report, the proposed development is in accordance with all relevant policy requirements of the Development Plan, except to the extent identified in the Material Contravention Statement accompanying this application.

- Consistency with any/all relevant National and Regional policy objectives.

Response: As set out in Section 6.0 and 7.0, the proposed development is in accordance with all relevant National and Regional policy objectives.

- Synergies with adjoining complementary uses and land use zoning objectives.

Response: The surrounding lands are predominately zoned 'Objective A' as per a large portion of the subject site and as set out in Section 8.1.2, the subject scheme provides residential development with a new Neighbourhood Centre, which improves residential amenity and protects the existing residential amenities which accords with this zoning

objective. The Neighbourhood Centre will support previous and future development in the village.

- *Density - Higher densities should be provided in appropriate locations. Site configuration, open space requirements and the characteristics of the area will have an impact on the density levels achievable.*

Response: As set out throughout this report, the proposed net density of 44.5 units per hectare (uph) will appropriately densify these sustainable and underutilised lands and will yield a significantly more appropriate and sustainable density (and is in accordance with the parameters of the LAP). Policy Objective PHP18 and PHP20 which relate to density have also been fully responded in this report.

- *Quality of the proposed layout and elevations, the quality of the residential environment will be of primary significance in determining the acceptability of planning applications. Layouts, elevations, and plan form must be designed to emphasise a 'sense of place' and community, utilising existing site features, tree coverage and an appropriate landscape structure.*

Response: The proposed high-quality development comprising 383 No. residential units and a Neighbourhood Centre will create a sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm. The inclusion of high-quality open spaces will enhance the quality of life for future residents and the opening up of the site onto Enniskerry Road and Glenamuck Road will positively contribute to the local area by improving legibility for the community.

- *Levels of privacy and amenity, the relationship of buildings to one another, including consideration of overlooking, sunlight/daylight standards and the appropriate use of screening devices.*

Response: These items have been appropriately considered as part of the proposed development as follows:

-Levels of privacy and amenity: Appropriate separation distances provided, gradual increase in height in an appropriate location to the north-east proximate to the neighbouring apartment block, provision of ample, carefully considered landscape planting where necessary.

-Relationship of buildings to one another: This has been thoroughly considered and discussed throughout the application documentation e.g. adequate separation distances have been provided i.e. distance between internal façades of houses in rear gardens and apartments/duplexes in communal courtyards are set at a minimum distance of 22 metres, high levels of daylight will infiltrate to the proposed rooms and there will be minimal impact on daylight to surrounding properties.

-Overlooking: The design has had regard for the residential amenity, privacy and built-form of neighbouring properties to ensure that overlooking does not occur e.g. adequate separation distances, heights increased in suitable locations and upper level set backs.

-Sunlight/daylight standards: The proposed development has been carefully designed and modulated to ensure there is minimal impact on the daylight and sunlight reaching

the existing and proposed residences on adjacent sites. In addition, the proposed scheme will perform well in relation to daylight/sunlight.

- *Quality of linkage and permeability – to adjacent neighbourhoods and facilities and the nature of the public realm/streets and spaces. Walking and cycling permeability shall be maximised at every opportunity.*

Response: The scheme has provided the opportunity to open up the site and provide enhanced permeability for Kilternan by providing linkages through the site to the neighbouring Rockville development and the future GLDR, which will be positive for the area. The opening up of the site onto Enniskerry Road especially with the provision of a Neighbourhood Centre and Village Green will positively contribute to the local area by improving legibility and the provision of services and amenities for the community. The new apartment blocks fronting the Glenamuck Road will also activate the streetscape which is currently inactive. The development will not be gated, ensuring that it reads as being open and connected with the streetscape along Enniskerry Road and Glenamuck Road.

- *Accessibility and traffic safety - proximity to centres and to public transport corridors, existing and proposed.*

Response: The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop.

The site is located in Kilternan Village with access to a pub/restaurant, a country market, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre as well as religious services in the Village such as Kilternan Parish Church and Our Lady of the Wayside Church. The proposed development includes a Neighbourhood Centre, which will provide additional services for Kilternan. Bus route Nos. 44, 63 and 118 serve the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kilternan within the Bus Connects scheme will serve Kilternan Village and offer transport links to Dublin City Centre and other suburbs and employment locations and education facilities in the greater Dublin area such as University College Dublin. Therefore, it is clear that the subject site is well connected and accessible.

- *Quantitative standards - set out in this Chapter and/or referenced in Government guidelines.*

Response: A full response to the relevant quantitative standards of Chapter 12 are provided within this Report in Section 8.o. All relevant Government Guidelines are responded to in Section 6.o.

- *Safety and positive edges to the public realm - opportunities for crime should be minimised by ensuring that public open spaces are passively overlooked by housing and appropriate boundary treatments applied.*

Response: The outdoor spaces will be subject to a high level of passive surveillance as they will be overlooked by the residential units and/or the Neighbourhood Centre, ensuring that these areas are safe and secure. Play spaces are provided for children and toddlers which will be safe and enjoyable.

- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public or communal open space.*

Response: Private open space has been provided for all units and in addition, a large quantum of communal open space (2,934 sq m) will be provided for the apartments and duplexes and 18,879 sq m of public open space will also be provided. These spaces are high quality and will provide a natural character throughout the scheme. The relationship between the spaces is demonstrated in the Landscape Rationale by Ronan MacDiarmada & Associates Landscape Architects & Consultants.

- *Quality of the pre-existing environmental sound environment.*

Response: As set out in the Acoustic Design Statement prepared by RSK Ireland Limited, 'baseline monitoring has found pre-existing noise levels are typical of a suburban location in the vicinity of a busy road network.

- *Context - having regard to the setting of the site, the surrounding character, streetscape, and the impact of any proposed development on the development potential of adjoining sites.*

Response: As discussed throughout the application documentation, the surrounding context is transitioning in character from lower density housing to higher density developments. The potential impact of the proposed development on adjoining sites has been appropriately assessed (Daylight and Sunlight Assessment, Landscape and Visual Impact Assessment etc.). The proposed development has been carefully designed and modulated to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites.

- *Variety of house types and unit size.*

Response: The development provides 383 No. residential units comprised of 27 No. one bedroom units, 128 No. two bedroom units, 171 No. three bedroom units and 57 No. four bedroom units, which will provide a variety of house types and unit sizes for the area.

- *Variety in layout through providing different lengths and types of residential roads, mixes of 'cul-de-sac', loop roads, set-back road sections, loose grid layouts and similar.*

Response: The Traffic and Transport Assessment prepared by Atkins notes that 'the layout is highly permeable with a coherent legible network of streets that meets desire lines and provides both internal and external connectivity'. The permeable links provided throughout the site layout provide a variety for pedestrians and cyclists and will be a safe space for all.

- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.*

Response: The scheme will enhance the street frontage onto Enniskerry Road and Glenamuck Road and passive surveillance of all open spaces will be provided. The enhancement and provision of permeable connections through the site, in particular the Dingle Way, will make a positive contribution to the Village and the provision of a Neighbourhood Centre will enhance available amenities for the area. The development includes a range of building heights from 2 to 5 No. storeys and large open spaces which allows the development to breathe and this will provide a good relationship between all elements of the scheme.

- *Roofscape, plant and green roofs.*

Response: These elements have all been included and detailed where relevant as part of the development.

Having regard to these responses, the development will achieve high standards of design and layout.

12.3.2.2 Sustainable Neighbourhood Infrastructure – Future Provision

(i) New Residential Communities

Planning applications for residential development on sites greater than 1ha or more than 50 residential units located in new residential communities (as set out in Figure 2.9, Chapter 2) will be required to facilitate sustainable neighbourhood infrastructure (SNI) (see Policy Objective PHP2 for a definition of SNI) through one or more of the following ways:

- *Reserve an area of not less than 5% of the site area for a future SNI facility. The site reservation may be part of the 15% public open space requirement (see Section 12.8.3.1) and may be subject to a Section 47 agreement with the Planning Authority. The area to be reserved shall be located in a manner that can be readily amalgamated with similar reservations within adjoining lands.*
- *Provide an appropriate SNI facility (see definition in Policy Objective PHP2) with a floor area of 130 sq.m. per 1,000 population equivalent. The type of facility must have regard to the demographic of the emerging area and any existing and planned facilities and services within a 1km distance / 10 minute walk of the site. It should be noted that a commercial childcare facility shall not be considered to be an SNI facility for the purposes of this Section.*
- *Provide a development contribution under Section 48 of the Planning and Development Act 2000 towards the provision and/or improvement of a community, cultural or civic facility that the residents of the proposed development will benefit from.*

For sites less than 1ha or less than 50 residential units, the Council may consider attaching a development contribution under Section 48 of the Planning and Development Act 2000 for the provision and/or improvement of community, cultural or civic facility that the residents of the proposed development will benefit from.

The subject site is located within a New Residential Community as designated on Figure 2.9 in Chapter 2. Policy Objective PHP2 states the following in relation to Sustainable Neighbourhood Infrastructure:

'It is a Policy Objective to:

- *Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- *Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- *Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.'*

Section 4.2.1 of the *Development Plan* further notes that:

*'Sustainable neighbourhood infrastructure is an umbrella term that, for the purposes of this Plan, includes land or buildings related to serving the needs of the local and wider community for **social**, educational, **health**, religious, recreational and leisure, **cultural**, and **civic needs**. Much of the existing sustainable neighbourhood infrastructure in the County offers a multi-faceted social function within neighbourhoods and provides an important role within communities. These facilities and services may be provided by public sector bodies, the community themselves or by the private sector.'* [Our Emphasis]

The proposed development includes various units that could be considered sustainable neighbourhood infrastructure such as the community facility (321 sq m) and the medical unit (147 sq m) within the Neighbourhood Centre. The provision of 428 sq m of Sustainable Neighbourhood Infrastructure within the proposed Neighbourhood Centre will be a positive insertion to the local community. We note that 383 No. units are proposed and when the national household size of 2.7 is utilised, this would result in 1,034 No. persons being accommodated within the proposed development. The *Development Plan* requires an appropriate SNI facility of 130 sq m per 1,000 population equivalent and therefore the proposed development far exceeds this requirement as 428 sq m is provided (c. 3 No. times the requirement). It is considered that this provision will adequately serve the surrounding existing and future population and the additional services provided within the Neighbourhood Centre will be an additional significant benefit. In addition, the Social Infrastructure Audit and Retail Services Assessment notes that *'the baseline study undertaken identified a significant range of services and facilities which contribute to quality of life for residents, with more than 150 no. social services and facilities were identified within proximity to the subject site'*. The Report further notes that the neighbourhood Centre uses *'will positively contribute to the amenity of the resident population once completed'*.

(ii) Existing Built Up Area

For residential schemes within the existing built up area, the Council will consider a development contribution under the Council Section 48 Levy Scheme for the provision and/or improvement of community, cultural or civic facility that the residents of the proposed development will benefit from.

Where the Community Audit (See Section 4.2.1.4 Policy Objective PHP5: Community Facilities) has identified a deficit in an area the Council may require the applicant to accommodate an SNI facility to address this deficit.

In both new residential community areas, and the existing built up area where a future school has been identified within or immediately adjoining the subject site, the applicant shall engage with the Department of Education and Skills (DES) in order to ascertain their requirements in relation to site provision.

Where a question arises as to whether a site falls within the built up area or within a new residential community area as set out in the Core Strategy and Figure 2.9 the decision shall be solely at the discretion of the Planning Authority.

The subject site is located within a New Residential Community rather than an Existing Built up area according to Figure 2.9 of the *Development Plan*.

The Social Infrastructure Audit enclosed confirms that there is adequate social infrastructure available to serve the proposed development including the new Neighbourhood Centre proposed within the subject development (which incorporates a community facility and medical unit for example).

12.3.3 Quantitative Standards for All Residential Development

Applications for residential schemes shall comply with all relevant requirements set out in PHP20: Protection of Existing Residential Amenity (see Section 4.3.1.3).

Policy Objective PHP20: sets out that it is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments. The site is located within a New Residential Community rather than a Built Up Area, however the scheme strikes a balance between developing underutilised lands to provide a high quality residential development while also protecting the surrounding properties with adequate separation distances and setbacks at upper levels provided where required. The Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment confirm that no material impacts will occur on surrounding properties.

12.3.3.1 Residential Size and Mix

The finding of the Housing Strategy and HNDA have informed policy PHP27 in relation to mix (refer to Appendix 2 Housing Strategy and HNDA 2022 – 2028).

In order to demonstrate compliance with Policy Objective PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County. Council Part 8 or Part 10 residential schemes, may propose a different mix having regard to the specific needs of the Council Housing Department.

The proposed provision of residential units (both houses and apartments), shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/ or within the County. New residential

communities (as set out in the Core Strategy and Figure 2.9 of the Core Strategy Map) shall ensure an appropriate mix including a proportion of larger units. Applications received in both new residential communities and within the residual built up area shall include:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
 - *Are designed and located having regard to the needs of older people and/or persons with a disability.*
 - *Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.*
- *A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.*

Table 12.1 sets out the mix requirements for apartment developments. Duplexes are considered to be apartments for the purposes of mix.

Table 12.1 Apartment Mix Requirements

Area	Threshold	Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
New Residential Community (See figure 2.9 Core Strategy Map)	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units and with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Lands within SUFP	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

To avoid ambiguity and provide clarity a worked example is given below.

Table 12.2 Worked example of DLR Apartment Mix requirements

Location	Proposed Development	Studio/1/2 bed Mix (Apartments and Duplexes) Requirement	Minimum 3+ bed Requirement (Apartments)
New Residential Community/SUFP	100 apartments	Up to 60 studio, 1 or 2 bed which can include ≥ 30 2 beds and can include up to 30 studio and 1 bed units with no more than 20 studios in that 30 units.	Minimum 40 no. 3 bed plus units.
Existing Built Up Area	100 apartments	Up to 80 studio, 1 or 2 bed units which can include ≥ 50 2 bed units and can include up to 30 studio and 1 bed units with no more than 20 studios in that 30 units.	Minimum 20 no. 3 bed plus units.

Honeypark

1. Please see below map which indicatively sets out existing and permitted unit types within a 10-minute walk of the proposed development:



[Green = Mix of Apartments/Houses (Existing and Permitted)
 Blue = Existing or Permitted Apartments
 Yellow = Existing or Permitted Houses]

2. A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units is set out below:

Unit Type	No. of Units	Percentage	Size
Studio	-	-	-
One Bedroom	27	7%	45.8 sq m to 65.3 sq m
Two Bedroom (4 No. Person)	128	33%	73 sq m to 113.0 sq m
Three Bedroom	171	45%	107 sq m to 164 sq m

Four Bedroom	57	15%	124.8 sq m to 156 sq m
Total:	383 No.	100%	

Table 12.1 of the *Development Plan* extracted above refers to the breakdown of apartment units which is as follows for the subject scheme:

Unit Type	No. of Units	Percentage
Studio	-	-
One Bedroom Apartment/Duplex	27	12%
Two Bedroom Apartment/Duplex	128	59%
Three Bedroom Apartment/Duplex	63	29%
Total:	218 No.	100%

Table 12.1 of the *Development Plan* notes the requirement for 40% 3 No. bedroom apartments to be provided and as set out above, the scheme provides 29% 3 No. bedroom apartments, which is considered acceptable for the subject development. This is fully detailed in the Material Contravention Statement enclosed.

3. Please see the quote below extracted from the Design Statement in relation to:

- A site and/or floor plans that clearly identify proposed units that:
 - Are designed and located having regard to the needs of older people and/or persons with a disability.
 - Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.
- A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.

The proposed scheme will provide a variety of housing types for the Kiltarnan area with the provision of a mix of 1, 2, 3 and 4 No. bedroom units.

As noted in the 'Housing Options for Our Ageing Population (2019)',

'Developments and neighbourhoods should incorporate a mix of dwelling type, size and tenure to support sound social and environmental policy objectives.'

The addition of these high-quality and varied units to the locality will provide a downsizing option for the ageing population of the area who wish to remain in their locality to which they have a link and connection to the community rather than the actual physical dwelling.

Furthermore, the dwellings would be capable of integrating assisted technologies if required while the development will be fully accessible as outlined in the Universal Access Statement by MCORM Architects, ensuring the *'the design provides for persons/users with a wide range of abilities and the intention is to make the design appealing to all end users/residents. There are a wide variety of unit types within the estate to cater for this'*.

As set out in the Design Statement prepared by MCORM Architects, 'the design of the buildings are all in accordance with Part M of the Building Regulations and will also have regards to the principles of universal access. This will foster an inclusive approach to the design of the built environment'.

In schemes of 50+ units, where a mixture of housing and apartments or a scheme comprising solely of houses is being provided on a site the housing offering must ensure a mixture that includes a proportion of housing units that are 3 beds or less. In new residential community areas, it is appropriate that schemes generally include houses in addition to apartment/duplexes. In deciding on the mix of house and apartments in these areas regard shall be had to the details of existing and permitted unit types within a 10-minute walk of the proposed development (see bullet point above). The apartment element, if in excess of 50 units, shall comply with the table above. Where a question arises as to whether a site falls within the built up area or within a new residential community area, as set out in the Core Strategy and Figure 2.9, the decision shall be solely at the discretion of the Planning Authority.

The site is within a new residential community as annotated on Figure 2.9 of the Core Strategy. The mix of units outlined above is appropriate for the area and will provide a choice of tenure with the provision of 7% one bedroom units, 33% two bedroom, 45% three bedroom units and 15% bedroom units. The scheme includes 165 No. houses, 118 No. duplexes and 100 No. apartments which provides a varied choice of tenure. As shown in the map above, the Kiltiernan area provides a mix of houses and apartments, which is also reflected in the proposed development and will thus add further choice and variety to the village and surrounding area. The apartment element does not provide the required 40% 3 bedroom units however we consider the proposed mix to be appropriate, especially due to the provision of 3 and 4 No. bedroom houses in addition to the apartments. This is fully detailed in the Material Contravention Statement enclosed.

12.3.3.2 Residential Density

In general, the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document:

- *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009).*
- *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).*

As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4).

Please see Section 6.8 of this Report for a response to the relevant standards of the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*. Please see Section 6.6 of this Report for a response to the relevant standards of the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)*.

The proposed development represents the consolidation of these underutilised Village Centre lands by providing much needed higher density residential units and a Neighbourhood Centre

in this sustainable location, which will contribute positively towards addressing the national housing crisis. Although the height (on parts of the site) and the density will increase from the very low rise and low density immediate context of older Kiltiernan development, it has been provided in an appropriate transitional manner between existing lower scaled developments in the area to the newer higher density schemes. Therefore, the density of the proposed development can be appropriately assimilated into the surrounding environment. A response to Policy Objective PHP18 is also provided in this Report.

12.3.4 Residential Development – General Requirements

The following general requirements relate to all housing developments including both housing and apartment developments and should be considered when designing housing developments to ensure general requirements as outlined below (see also Section 12.3.1.1 for overall design criteria).

12.3.4.1 Road and Footpath Requirements

The requirements set down in the Council's 'Development Works in Residential and Industrial Areas' - Guidance Document, the Council's 'Taking in Charge Policy Document', (2011 – updated 2013) and 'The Design Manual for Urban Roads and Streets', (DMURS), 2019, will generally apply.

Where an innovative layout is accepted by the Planning Authority variations to these requirements may be accepted. In allowing any deviation in the general requirements, the primary consideration will be the safety of pedestrians, cyclists and access for emergency vehicles.

Continuous footpaths shall be provided at junctions, and vehicular entrances, to facilitate people with ease of movement. At any such junctions where continuous footpaths are neither feasible nor appropriate, dished kerbs with tactile paving shall be provided to facilitate people with ease of movement.

Atkins have advised that the design of the road, pedestrian and cycle network is compliant with the DMURS and the DLR Policy Document. Continuous footpaths are provided at junctions.

Section 5.3 of the *Traffic and Transport Assessment* by Atkins includes an assessment of the scheme with DMURS, which notes:

'DMURS requires a collaborative design process and a holistic design approach to the layout and design of urban streets; to this end the design team consisting of planners, architects, engineers and the client have engaged in a consultative process to ensure that the proposed development incorporates the design principles espoused in DMURS.'

12.3.4.2 Habitable Rooms

The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission, including the minimum dimensions as set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018), and 'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).

All habitable rooms within new residential units shall have access to appropriate levels of natural /daylight and ventilation. Development shall be guided by the principles of *Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011)* and/or any updated, or subsequent guidance, in this regard. A daylight analysis will be required for all proposed developments of 50+ units, or as otherwise required by the Planning Authority. The impact of any development on existing habitable rooms should also be considered.

Please see Section 6.6 of this Report for a response to the relevant standards of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018) [now 2020]* ("Apartment Guidelines, 2020"), which demonstrates that the scheme will conform with the relevant standards of these Guidelines. Please see Section 6.7 of this Report for a response to the relevant policies of the *Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)*.

A Daylight and Sunlight Assessment prepared by 3D Design Bureau is enclosed separately. The proposed development has been carefully designed to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences, and to ensure that future residents are afforded a high level of daylight infiltration.

12.3.4.4 Phased Development

No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development.

In addition, when considering proposals for development within the curtilage of Protected Structures a proposed phasing agreement should be provided (refer to Section 12.11.2.3).

A phasing schedule for any such development shall be submitted with a planning application.

The Social Infrastructure Audit enclosed confirms that there is adequate social infrastructure available to serve the proposed development. The Engineering Report by Roger Mullarkey & Associates confirms there is adequate physical infrastructure to serve the development. In particular, a Confirmation of Feasibility and Statement of Design Acceptance has been received from Irish Water. The *Traffic and Transport Assessment* by Atkins confirms that local buses and Luas services from Ballyogan Wood are 'operating with spare capacity that can accommodate additional loading associated with the development'. The *Traffic and Transport Assessment* also notes that 'there are no traffic or transport impacts that would preclude this development from proceeding'.

12.3.4.5 Management Companies and Taking in Charge

In residential developments, which are not proposed to be Taken in Charge by the Council, evidence will be required that private Management Companies are to be set up by time of completion of the estate, and of which membership shall be compulsory for all purchasers of property. If a development (or part thereof) is to be Taken in Charge by the Council the applicant shall agree, which areas are to be Taken in Charge, and this shall be clearly indicated on a site layout plan. All areas not to be Taken in Charge by the Council, shall also be clearly indicated on a site layout plan, and shall be maintained and the responsibility of a properly constituted Private Management Company.

These details shall be submitted with the planning application. All roads, footpaths, sewers, drains, lighting columns, mini-pillars, watermains, services and open spaces within the privately managed areas, irrespective of the management and maintenance regime to be put in place for these areas, shall be satisfactorily completed to the standard for development works as set out in the Council's 'Development Works Guidance Document'. In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document 'Taking in Charge of Residential Developments Circular Letter PD 1/08', and 'Circular Letter PL 5/2014', the Departments 'National Taking in Charge Initiative Report', 2018, and the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.

McCossan O'Rourke Manning Architects have prepared Taking In Charge Drawings (Dwg Nos. PL600, PL600.1, PL600.2 and PL600.3), which demonstrate the areas proposed to be taken in charge (i.e. the roads and streets).

A Private Management Company will be engaged to ensure all property management functions area dealt with for the development. As set out in the Lifecycle and Management Report:

'It is proposed that the "Kiltiernan Village Development" will be a Managed Scheme/Development and an Owners Management Company (OMC) will be incorporated as defined by the Multi-Unit Developments Act 2011 "a company established for the purposes of becoming the owner of the common areas of a multi-unit development and the management, maintenance and repair of such areas and which is a company registered under the Companies Acts".

12.3.4.7 Refuse Storage and Services

Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents.

In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. (See also Appendix 6).

Please refer to the Outline Operational Waste Management Plan prepared by Enviroguide Consulting which details the waste strategy for the proposed development.

12.3.5 Apartment Development

See Section 12.4.5 and Section 12.8 for Car Parking and Open Space Requirements pertaining to apartment developments.

See responses to these sections below.

12.3.5.1 Dual Aspect in Apartments

A dual aspect apartment is designed with openable windows on two or more walls, allowing for views in more than just one direction. The windows may be opposite one another, or adjacent around a corner. The use of windows, indents or kinks on single external elevations, in apartment units which are otherwise single aspect apartments, is not considered acceptable and/or sufficient to be considered dual aspect and these units, will be assessed as single aspect units.

Specific Planning Policy Requirement (SPPR) 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018), provides guidance with respect to the minimum number of dual aspect apartments that may be provided in any single apartment schemes. In accordance with this guidance, DLR as a County is classified as a suburban or intermediate location and therefore:

- *There shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, DLR may exercise discretion to consider dual aspect unit provision at a level lower than the 50% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

The proposed houses within the scheme will all be dual aspect, 95% of the duplexes will be dual aspect (112 No. of 118 No. duplexes) and 69% of the apartments will be dual aspect (69 No. of 100 No. apartments), which exceeds the 50% requirement.

The following two policies relation to separation distances:

12.3.5.2 Separation Between Blocks

All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.

A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.

12.8.7.1 Separation Distances

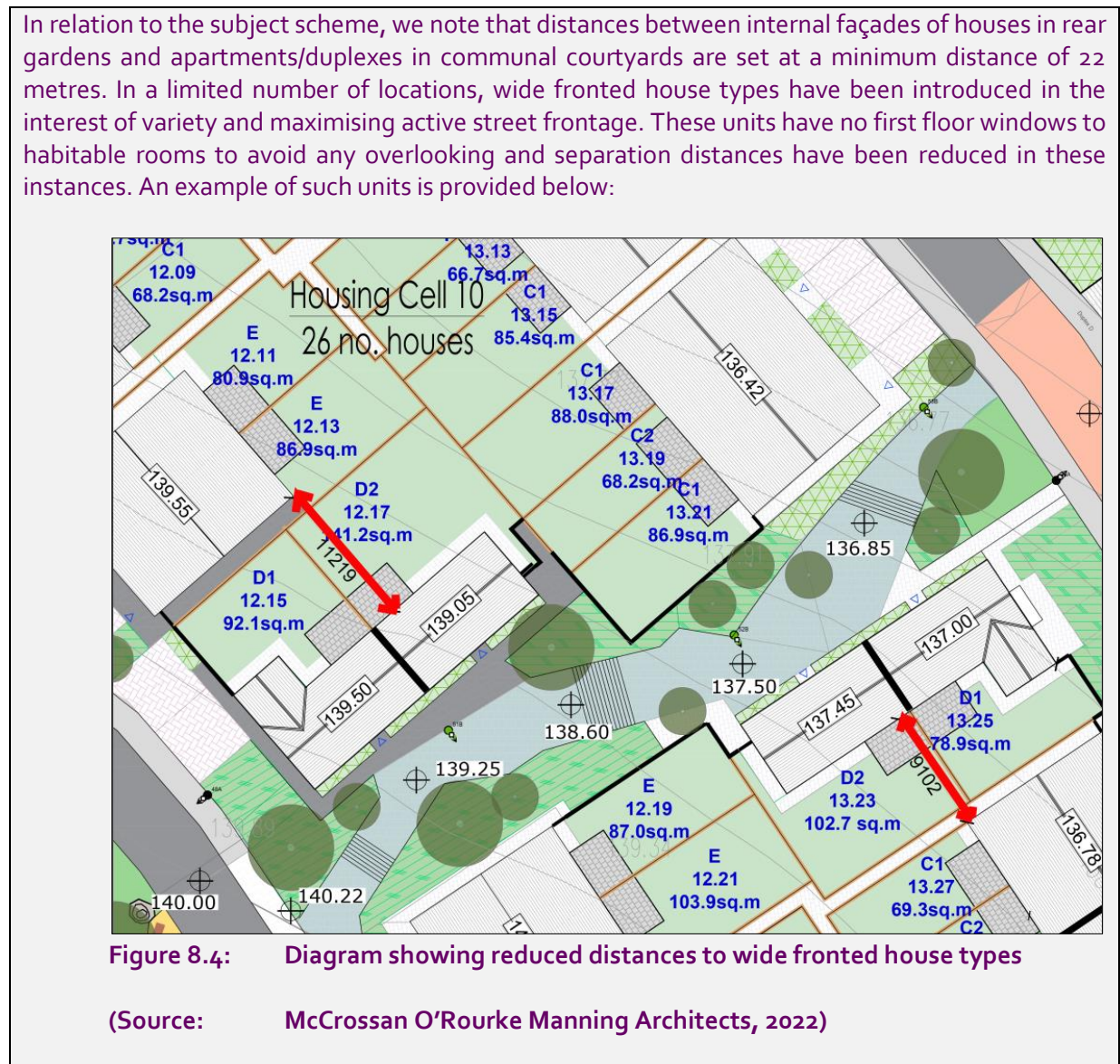
A minimum standard of 22 metres separation between directly opposing rear first floor windows should usually be observed, for new developments. This normally results in a minimum rear garden depth of 11 metres. However, this required rear garden depth may be prior to any domestic rear extensions, which may require planning permission or be exempted development being carried out. Adequate separation distances, between directly opposing rear first floor windows, should be provided when extending existing dwellings at first floor level, to ensure the retention of adjoining residential amenity. For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity.

However, where sufficient alternative private open space (e.g. to the side) is available, the required separation distance for new developments may be reduced, subject to the maintenance of privacy and protection of adjoining residential amenities.

In all instances, private open space should not be unduly overshadowed and where there is the potential for the proposed development to overshadow or overlook existing/future development adjoining the site, minimum separation distances to boundaries should be increased.

In an exceptionally well-designed scheme providing an otherwise very high-quality living environment and that is in close proximity to existing public open spaces, the above standards may be relaxed.

Any relaxing of standards will be assessed on a case-by-case basis and should not be seen as setting a precedent for future development.



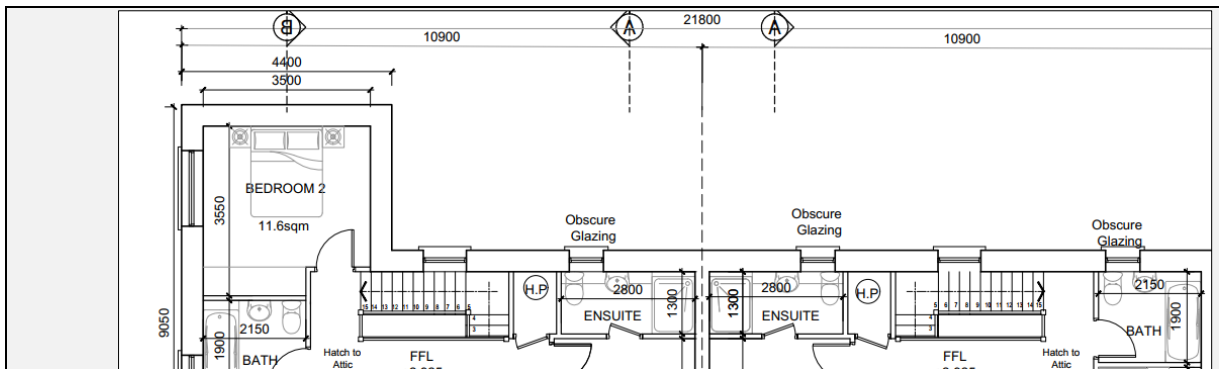


Figure 8.5: Extract from Dwg. No. PL313 Demonstrating Obscure Windows Provided

(Source: Dwg No. PL313, McCrossan O’Rourke Manning Architects, 2022)

Private rear gardens comply with the *Development Plan* guidelines in all cases. Separation distances between the units and the site boundary are carefully considered and where appropriate, windows are opaque to prevent overlooking of adjacent dwellings i.e. as shown in Figure 8.5 where obscure glazing is provided to bathrooms.

In relation to Duplex Block D in proximity to the neighbouring 5 No. dwellings in Rockville (DLR Reg. Ref. 18A/0566), there is just 1 No. dwelling that is located ‘opposite’ a neighbouring dwelling. In this instance, there are no windows on the first and second floor of the proposed duplex unit and thus a reduced separation distance is proposed. In relation to Apartment Blocks C and D, there are reduced separation distances provided to the boundary, however there are mostly car parking spaces and streets located in the neighbouring Rockville development (DLR Reg. Ref. D17A/0793). There is a pinch point at the location of the existing apartment block in the neighbouring Rockville development however this recently developed block is built very close to the application site boundary and in this instance, it would be difficult to achieve the 22 metre separation distance with any development on the subject site. The proposed development provides a separation distance of c. 11.9 metres to the existing apartment block which is considered acceptable in the interests of sustainably developing these serviced lands. Please see MCORM’s architectural drawing pack for further details.

12.3.5.3 Internal Storage and External Storage

Internal storage standards for apartments shall accord with, or exceed the levels outlined in Table 12.3 below:

Unit Type	Minimum Storage Space Requirement
One Bedroom	3 sq m
Two Bedrooms (3 persons)	5 sq m
Two Bedrooms (4 persons)	6 sq m
Three bedrooms	9 sq m

- Storage should be additional to kitchen presses and bedroom furniture.
- Hot press/boiler space will not count as general storage.

- No individual storage room should exceed 3.5sq.m. and shall be provided within the apartment unit.

Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.

All units will meet, and exceed in some cases, the internal storage standards and requirements set out in Table 12.3. Please refer to the Housing Quality Assessment Tables prepared by MCORM Architects. Bedroom furniture has not been included in the storage calculations. If a storage room exceeds 3.5 sq m, the additional space is a bonus for the units (however 3.5 sq m is only counted towards the storage calculations).

External storage has also been provided within the ground floor of the Neighbourhood Centre and within Apartment Blocks C and D. This will provide space for bulky items outside individual units and will be additional to the minimum internal storage requirements.

12.3.5.4 Penthouse Development

The addition of a penthouse level – which typically consists of high quality roof level living accommodation in an apartment development - may be acceptable where living space constitutes the equivalent of one storey and is set back from the edge of the building. A penthouse level should have regard to the overall design of an apartment block and should be finished with high quality materials and not have a negative visual impact on the skyline and/or streetscape (refer also to the Building Height Strategy set out in Appendix 5).

The proposed development includes set back floor levels at the upper floor of Apartment Blocks C and D which may be considered as penthouse. These set back levels will assist in assimilating the development into the surrounding context, provides additional separation distances to surrounding properties and reduces the perceived massing of the development.

12.3.5.5 Minimum Apartment Floor Areas

All apartment developments shall accord with or exceed the minimum floor areas indicated in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities', (2018), as set out in the Table 12.4 below.

In this regard, the areas listed are minimum standards and should not be taken as the norm for all developments; higher floor areas will be encouraged throughout the County.

Unit Type	Minimum Area per Unit
Studio	37 sq m
One Bed	45 sq m
Two Bedrooms (3 persons)	63 Sq m
Two Bedrooms (4 persons)	73 sq m
Three bedrooms	90 sq m

In order to safeguard standards, the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed, by a minimum of 10% (excluding studios).

As set out in the Housing Quality Assessment prepared by MCORM Architects, all units meet the minimum overall apartment floor areas. 100% of the apartments will exceed the minimum floor area by 10%, and 88% of the duplexes will exceed the minimum floor area by 10%. The scheme therefore provides very high-quality units due to the large quantum of units exceeding the minimum size by 10%.

12.3.5.6 Additional Apartment Design Requirements

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

A maximum of 12 apartments per floor per core may be provided in apartment schemes (Not applicable to BTR development in accordance with SPPR 8). This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality, and compliance with building regulations.*

The ground floor of the Neighbourhood Centre is provided with floor to ceiling heights of 3.4 metres at a minimum and the apartment blocks are provided with a minimum height of 2.9 metres. The duplexes are provided with a minimum ground floor to ceiling height of 2.7 metres. All upper levels have been designed with a floor to ceiling height of at least 2.4 metres which is considered good practice.

Apartment Block C provides a maximum of 7 No. units per core and Apartment Block D provides a maximum of 6 No. units per core. In the Neighbourhood Centre, Block A provides a maximum of 7 No. units per core and Block B provides a maximum of 8 No. units per core, which is in accordance with the *Development Plan*.

12.3.7.7 Infill

In accordance with Policy Objective PHP19: Existing Housing Stock – Adaptation, infill development will be encouraged within the County. New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.

This shall particularly apply to those areas that exemplify Victorian era to early-mid 20th century suburban 'Garden City' planned settings and estates that do not otherwise benefit from ACA status or similar. (Refer also to Section 12.3.7.5 corner/side garden sites for development parameters, Policy Objectives HER20 and HER21 in Chapter 11.

It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*. The development represents sustainable infill development of underutilised lands which will fill in a gap between Rockville and Enniskerry Road and has been designed to assimilate with the surrounding environment.

12.3.8 Housing for All

12.3.8.1 Age Friendly Housing

Having regard to the current and future demographic conditions and the ageing demographic of the County, it is an objective of the of DLR to promote an age friendly approach by ensuring that both existing and proposed residential developments are future proofed for an ageing population.

In accordance with the principles of the Policy Statement 'Housing Options for Our Ageing Population' 2019, the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-friendly approach, with facilities and materials inclusive of an age-friendly community/society in line with the above guidelines.

The proposed scheme will provide a variety of housing types for the Kiltiernan area with the provision of a mix of 1, 2, 3 and 4 No. bedroom units.

As noted in the 'Housing Options for Our Ageing Population (2019)',

'Developments and neighbourhoods should incorporate a mix of dwelling type, size and tenure to support sound social and environmental policy objectives.'

The addition of these high-quality and varied units to the locality will provide a downsizing option for the ageing population of the area who wish to remain in their locality to which they have a link and connection to the community rather than the actual physical dwelling.

Furthermore, the dwellings would be capable of integrating assisted technologies if required while the development will be fully accessible as outlined in the Universal Access Statement by MCORM Architects, ensuring the *'the design provides for persons/ users with a wide range of abilities and the intention is to make the design appealing to all end users/ residents. There are a wide variety of unit types within the estate to cater for this'*.

As set out in the Design Statement prepared by MCORM Architects, *'the design of the buildings are all in accordance with Part M of the Building Regulations and will also have regards to the principles of universal access. This will foster an inclusive approach to the design of the built environment'*.

12.3.9 Demolition and Replacement Dwellings

The Planning Authority has a preference for the deep retro-fit of structurally sound, habitable dwellings in good condition as opposed to demolition and replacement unless a strong justification in respect of the latter has been put forward by the applicant. (See Policy Objective CA6: Retrofit and Reuse of Buildings and Policy Objective PHP19: Existing Housing Stock - Adaptation).

Demolition of an existing house in single occupancy and replacement with multiple new build units will not be considered simply on the grounds of replacement numbers only but will be weighed against other factors. Better alternatives to comprehensive demolition of, for example, a distinctive detached dwelling and its landscaped gardens, may be to construct structures around the established dwelling and seek to retain characteristic site elements.

The Planning Authority will assess single replacement dwellings within an urban area on a case by case basis and may only permit such developments where the existing dwelling is uninhabitable.

Applications for replacement dwellings shall also have regard to Policy Objectives HER20 and HER21 in Chapter 11. In this regard, the retention and reuse of an existing structure will be encouraged over replacing a dwelling, and the planning authority will encourage the retention of exemplar nineteenth and twentieth century dwellings on sites in excess of 0.4 hectares. Applications for replacement dwelling within the rural area will be assessed under the provision of Section 12.3.10.4.

The subject scheme will result in the appropriate densification of an underutilised site, providing high-quality residential units and a Neighbourhood Centre in lieu of the existing derelict dwelling known as 'Rockville' and associated derelict outbuildings (to be demolished). The existing nature of the site does not represent the sustainable use of serviced land in the context of contemporary planning policy, policies which seek to more appropriately and efficiently use scarce urban land. In addition, we note that the structures are not Protected Structures.

12.4.1 Traffic Management and Road Safety

The road layout of new residential, commercial, and/or mixed-use developments shall be designed in accordance with DMURS which seeks to create self-enforcing 30km/h zones. This Manual sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets, incorporating a multidisciplinary approach to the design of low speed environments in urban areas. All works carried out shall meet the requirements of the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.

To provide for pedestrians and cyclists as part of the development management process, all new development will be required to maximise permeability and connectivity for pedestrian and cyclists and to create direct links to adjacent roads and public transport networks in accordance with the provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), 'Sustainable Urban Housing: Design Standards for Apartments' (2018) and the 'Design Manual for Urban Roads and Streets' (DMURS, 2019).

On existing roads, traffic management measures may be required to create a pedestrian and cycle friendly environment. Road safety interventions may also be required to create a safe road environment for all road users such as the provision of accessible pedestrian facilities and segregated cycle tracks.

To ensure that the needs of all road's users are considered, a Quality Audit may be required for major developments that impact on the road network and for all new road and traffic schemes. This should be carried out in accordance with DMURS and best UK practice. The Design Manual for Urban Roads and Streets Quality Audits generally consist of a number of individual and overlapping audits that may include: an audit of visual quality; a review of how the street is/may be used by the community; a road safety audit, including a risk assessment; an access audit; a walking audit; a cycle audit; a non-motorised user audit; a community street audit (in existing streets); and a place check audit. A street design audit was added as an additional audit type in the DMURS Guidance in 2019. It can be submitted as a component of a Quality Audit (for larger projects) or as a stand-alone audit process for smaller projects, the emphasis is on placemaking and promoting the multidisciplinary aspects of successful street design. This is an auditing tool that can be used to ensure that the that the four

major aspects of street design as set out in DMURS: Connectivity, Self-Regulating Street Environment, Pedestrian and Cycling Environment, and Visual Quality are appropriately taken into account.

Potential applicants for planning permission should engage in pre-planning discussions to ascertain which audits, if any, should be submitted with the application. Further details on the guidance on the audit thresholds can be found within the 'Development Management Thresholds Information Document' in Appendix 3.

The design of the road network is DMURS compliant. A DMURS Statement is included in Traffic and Transport document. Permeability through and within the site is maximised. The Enniskerry Road treatment improves pedestrian and cycle facilities making it safer for all road users and improves its place making function as a neighbourhood centre area. A Road Safety Audit / Quality Audit has been carried out by Atkins and is included as part of the planning application.

Pedestrians and cyclist permeability has been considered and the scheme maximises permeability and connectivity for pedestrian and cyclists by creating direct links through and within the site to surrounding areas/developments. Furthermore please refer to Section 6.8 of this Report for a response to the relevant provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), Section 6.6 for the 'Sustainable Urban Housing: Design Standards for Apartments' (2018) [now 2020] and Section 6.10 for the 'Design Manual for Urban Roads and Streets' (DMURS, 2019).

12.4.2 Traffic and Transport Assessment

Where new development has significant car trip potential, a detailed assessment of:

- The transportation systems available and
- The impact of the proposed development on the surrounding environment and transportation network, should be appraised through the submission of a Traffic and Transport Assessment (TTA), in accordance with Transport Infrastructure Ireland (TII) 'Traffic and Transport Assessment Guidelines', (2014). The requirements for a TTA should be ascertained at pre-planning stage.

Traffic and Transport Assessments shall project forward 5 years and 15 years after opening date in accordance with the TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines, and shall, in their analysis, consider all major road and traffic schemes and existing and proposed developments in an area (Refer also to Appendix 3 Development Management Thresholds).

A Traffic and Transport Assessment has been prepared by Atkins, which takes account of all relevant guidance including the 'Traffic and Transport Assessment Guidelines' (2014) concludes that:

'The proposed development is considered appropriate, and it is considered that there are no traffic or transport impacts that would preclude this development from proceeding.'

The Traffic and Transport Assessment also considered the public transport systems available (bus and Luas) and concludes that local buses and Luas services from Ballyogan Wood are

'operating with spare capacity that can accommodate additional loading associated with the development'.

12.4.3 Travel Plans

Preparation of a travel plan required.

A Mobility Management Plan has been prepared by Atkins.

12.4.4 Street Lighting

The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015 and further updates and also the Council's 'Public Lighting Installations in Residential and Industrial Areas Guidance Document'.

Residential areas are designed in accordance with EN13201-2:2015 Category P4. The lighting category was derived as per the methodology of EN13201-1:2014. The step sections are designed in accordance with I.S.EN17210-2021 with illuminance levels as per the recommendations of BS8300-1:2018 Table 5 Stairways and ramps (open) in the external environment. All areas with column mounted luminaires meet the requirements of the Council's 'Public Lighting Installations in Residential and Industrial Areas Guidance Document'.

12.4.5.1 Parking Zones

The propensity of people to choose non car modes is to a great extent determined by proximity to quality public transport as well as the range and accessibility, on foot or by bicycle, of services within an area. The County has therefore been divided into four Parking Zones, reflecting the varying degrees to which these criteria are generally met. Car parking within new developments will be in accordance with the standards set out in Table 12.5. The Parking Zones are indicative as set out on Map T2 and described below:

(i) Parking Zone 1:

This zone generally comprises the Major Town Centre areas of Dún Laoghaire and Dundrum together with the Blackrock District Centre area. These are areas, which are generally characterised by:

- Access to a high level of existing and planned public transport services (rail and bus) with good interchange potential.*
- A high level of service accessibility, existing and planned, by walking or cycling.*
- A capacity to accommodate high density retail, office and residential developments.*

Within parking zone 1 Maximum car parking standards have been set for all uses including residential.

(ii) Parking Zone 2

This zone generally includes areas, which are within the following walking bands/catchments:

- 10 minute walk of the proposed CBC 13 (Core Bus Corridor) from DCC boundary along the N11 to Kill Lane.*

- 5 minute walk of the N11 proposed CBC from Kill Lane Junction to Bray.
- 10 minute walk of the proposed CBC 15 from DCC boundary to Blackrock.
- 5 minute walk of Kill Lane/Avenue/Mounttown bus route.
- 10 minute walk of Dart and Luas stations.

Note: The N11 Quality Bus Corridor (QBC) and the Rock Road QBC will be replaced by CBC 13 and 15.

These are areas, which are generally characterised by:

- Access to a good level of existing or planned public transport services.
- A good level of service accessibility, existing and planned, by walking or cycling.
- A capacity to accommodate a higher density of development than surrounding areas.

Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. For residential uses reduced provision may be acceptable dependent on criteria set out in Section 12.4.5.2 below.

(iii) Parking Zone 3

This zone generally comprises the remainder of the County, excluding rural areas. These are areas, which are generally characterised by:

- Access to a level of existing or planned public transport services
- A reasonable level of service accessibility, existing and planned, by walking or cycling
- A capacity to accommodate a higher density of development than rural areas.

Within parking zone 3 maximum standards shall apply to uses other than residential where the parking standard shall apply. In zone 3 additional parking shall be provided for visitors in residential schemes at a rate of 1 per 10. In some instances, in zone 3 reduced provision may be acceptable dependent on the criteria set out in 12.4.5.2 (i) below with particular regard to infill/brownfield developments in neighbourhood or district centres.

*The proposed development is located in Zone 3 as defined under the *Development Plan*. Car parking within the development is provided in accordance with Table 12.5 and the *Apartment Guidelines, 2020*. The location of car parking spaces and the car parking allocation can be seen on the Architect's drawings (Dwg No. PL601 –Car Parking Plan)*

12.4.5.2 Application of Standards

In relation to the maximum standards, any proposals exceeding these standards will be permissible only in exceptional circumstances; such as where the Planning Authority consider that there is a specific requirement for a higher number of spaces. An example of this would be in instances where there are demonstrable benefits for the wider area through regeneration or similar urban and civic improvement initiatives.

In certain instances, within all zones, applicants may be required to provide the maximum number of spaces.

In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 or may consider that no parking spaces are required. Small infill residential schemes (up to 0.25 hectares) or brownfield/refurbishment residential schemes in zones 1 and 2 along with some locations in zone 3 (in neighbourhood or district centres) may be likely to fulfil these criteria.

In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority, having regard to criteria as set out below:

(i) Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5)

- *Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The need to safeguard investment in sustainable transport and encourage a modal shift.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Existing availability of parking and its potential for dual use.*
- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*
- *The range of services available within the area.*
- *Impact on traffic safety and the amenities of the area.*
- *Capacity of the surrounding road network.*
- *Urban design, regeneration and civic benefits including street vibrancy.*
- *Robustness of Mobility Management Plan to support the development.*
- *The availability of on street parking controls in the immediate vicinity.*
- *Any specific sustainability measures being implemented including but not limited to:*
 - *The provision of bespoke public transport services.*
 - *The provision of bespoke mobility interventions.*

Where a development site is located on the boundary of two or more parking zones, the level of parking provision will be decided at the discretion of the Planning Authority having regard to the criteria set out above. In Zones 1 and 2, where a deviation from the parking standards set out in Table 12.5 is being proposed, the applicant should engage with the Council at pre-planning stage regarding the acceptability of the proposal.

The car parking provision has been guided by the contents of the *Development Plan and Apartment Guidelines, 2020*. As the subject site is located in Parking Zone 3 ('Remainder of County (non-rural)'), the standards shown in the table below apply to the proposed development. It is noted that these are stated 'standards' for residential and not maxima or minima (see stated in Table 12.5 of the *Development Plan*). As also shown in the Table, based on the proposed number and mix of units, there is a standard requirement to provide 640 No. car parking spaces for the residential element.

Unit Type	Car Parking Standard in Zone 3	Visitor Car Parking in Zone 3	Units Proposed	Standard No. of Spaces Required
1-bed apartment/duplex	1 per unit	1 in 10 visitor parking for apartments	27	27 + 3 visitor = 30 No. spaces
2-bed apartment/duplex	1 per unit	1 in 10 visitor parking for apartments	128	128 + 13 visitor = 141 No. spaces
3-bed apartment/duplex	2 per unit	1 in 10 visitor parking for apartments	63	126 + 13 visitor = 139 No. spaces
3 bed + houses	2 per unit	N/A	165	330 No.
Total			383	640

Table 12.5 further outlines 'maximum' standards for non-residential uses. As shown below, based on the provision of non-residential uses, there is a maximum requirement to provide 57 No. car parking spaces.

Unit Type	Car Parking Standard in Zone 3	Area Proposed	No. of Spaces Required
Creche	1 per 40 sq m	439 sq m	11
Office	1 per 100 sq m	317 sq m	4
Medical	2 per consulting room	147 sq m	2
Retail	1 per 50 sq m	857 sq m	18
Retail Convenience	1 per 30 sq m	431 sq m	15
Community Facility	1 per 50 sq m	321 sq m	7
Total			57

The proposed development provides the following car parking spaces:

- 330 No. car-parking spaces to serve the 165 No. houses which is in accordance with the *Development Plan* standards (2 No. per unit);
- 221 No. car parking spaces to serve 218 No. apartment and duplex units at a ratio of c. 1 space per unit. The *Development Plan* provides a requirement for 281 No. car parking spaces for the apartments and duplexes as a 'standard' and thus the provision is slightly lower than the standard outlined in the *Development Plan*;
- 70 No. visitor car parking spaces to serve 218 No. apartment and duplex units at a ratio of 0.32 per unit. The *Development Plan* provides a requirement for 23 No. car parking spaces for the apartments and duplexes as a 'standard' and thus the provision is higher than the standard outlined in the *Development Plan*. However the visitor parking has been provided in accordance with the *Apartment Guidelines, 2020* which is detailed below; and

- 57 No. car parking spaces to serve the non-residential element.

Therefore, the residential car parking provision for the apartments/duplexes and related visitor car parking is slightly lower than the standard requirement set out in the *Development Plan*. However, it is deemed appropriate for the location of the development in the centre of Kiltiernan Village, the proposed mix of units and the availability of ample bicycle parking. The houses have been provided with car parking spaces in accordance with the standards. In addition, the non-residential maximum standard is 57 No. spaces which has been provided and thus the scheme meets the requirements of the *Development Plan* in this regard. Therefore, the provision of parking and visitor parking for the apartments and duplexes are the only element below the standards and this has been justified and included in the Material Contravention Statement enclosed.

We note that the parking provision for apartments and duplexes has been provided in accordance with the guidance outlined in the *Apartment Guidelines, 2020*. Section 4.22 of the *Apartment Guidelines, 2020* states the following:

*'As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, **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.**'* [Our Emphasis]

These standards are outlined below:

Unit Type	Car Parking Standard in Zone 3	Units Proposed	No. of Spaces Required
1-bed apartment/duplex	1 per unit	27	27
2-bed apartment/duplex	1 per unit	128	128
3-bed apartment/duplex	1 per unit	63	63
Visitor	1 space per 3-4 apartments		55 – 73
Total		218	218 No. for the units and 55-73 No. for visitors

Therefore, based on this guidance outlined in the *Apartment Guidelines, 2020*, the development could generally provide 218 No. car parking spaces for the apartments and duplexes and 55-73 No. visitor parking spaces for the apartments and duplexes. The development provides 221 No. spaces for the apartments and duplexes and 70 No. visitor parking space which is in accordance with Section 4.22 of the *Apartment Guidelines, 2020*.

In addition, the *Development Plan* does allow for a deviation from the standards which it sets for car parking (apartments and duplexes are the only element below the *Development Plan* standards). Specifically, Section 12.4.5.2 of the *Development Plan* states:

'In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will

be decided at the discretion of the Planning Authority, having regard to criteria as set out below:

- Proximity to public transport services and level of service and interchange available.
- Walking and cycling accessibility/permeability and any improvement to same.
- The need to safeguard investment in sustainable transport and encourage a modal shift.
- Availability of car sharing and bike / e-bike sharing facilities.
- Existing availability of parking and its potential for dual use.
- Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).
- The range of services available within the area.
- Impact on traffic safety and the amenities of the area.
- Capacity of the surrounding road network.
- Urban design, regeneration and civic benefits including street vibrancy.
- Robustness of Mobility Management Plan to support the development.
- The availability of on street parking controls in the immediate vicinity.
- Any specific sustainability measures being implemented including but not limited to:
 - The provision of bespoke public transport services.
 - The provision of bespoke mobility interventions.'

Informed by the foregoing, the following points summarise the justifiable reduction in the provided car parking provision:

1. **Proximity to public transport services and level of service and interchange available.**
Number of bus services located in the vicinity of the site and Ballyogan Wood Luas stop within c. 2.3 km – c. 2.7 km (c. 26-31 minute walking distance).
2. **Walking and cycling accessibility/permeability and any improvement to same.**
Good existing walking facilities and significant improvements to walking and cycling proposed.
3. **The need to safeguard investment in sustainable transport and encourage a modal shift.**
Level of car parking looks to balance between provision of necessary amount while not adversely impacting on encouraging mode shift.
4. **Availability of car sharing and bike / e-bike sharing facilities.**
Car sharing facility provided on site subject to agreement with share provider.
5. **Existing availability of parking and its potential for dual use.**
Mixed use nature of the development with different land uses and car parking demand and utilisation provides flexibility.

6. Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).

As noted above, mixed use nature of the development with different land uses and car parking demand and utilisation provides flexibility. It is noted that residents will be able to access the Neighbourhood Centre without access to a vehicle which is a positive benefit for the scheme.

7. The range of services available within the area.

Development provides creche, office, medical, community and retail use which would facilitate internal trips reducing car trips and car ownership.

8. Impact on traffic safety and the amenities of the area.

Level of car parking is balanced so as to not adversely impact on safety.

9. Capacity of the surrounding road network.

Reduced car parking versus *Development Plan* standards will result in few trips on the network that will have a positive impact on capacity versus higher parking version.

10. Urban design, regeneration and civic benefits including street vibrancy.

Level of car parking is a balance to achieving an optimal urban realm that includes landscaping and amenity, play, safety and place making.

11. Robustness of Mobility Management Plan to support the development.

A Mobility Management Plan is provided as part of the planning application.

12. The availability of on street parking controls in the immediate vicinity.

N/A

13. Any specific sustainability measures being implemented including but not limited to:

- *The provision of bespoke public transport services.*
- *The provision of bespoke mobility interventions.*

N/A

A summary of the car parking provided in the proposed development is provided below:

Total Development Car Parking	
Residential Car Parking Provision	621
Non -residential Car Parking Provision	57
Total Development Car Parking	678

Other Car Parking included in the above total of 678 No.:			
	Residential	Non- Residential	Total
Disabled Car Parking	12	4	16
EV	61	12	73
Motorcycle	12		12
Parent & Child	N/A	3	3

12.4.5.3 Car Parking – General

In instances where Table 12.5 does not specify a parking standard for a particular land use, the Planning Authority shall determine the parking requirements having regard to the assessment criteria for parking provision as set out above.

For both residential and non-residential car parking, 4% of car parking provision shall be suitable for use by disabled persons. In certain circumstances the Planning Authority may consider that a higher disabled parking content may be required depending on the nature of development. All disabled parking should be clearly marked and suitably sign posted for convenient access.

A minimum of 4% of car parking spaces provided shall be reserved for parent and child parking for commercial, retail, health, childcare, hotels, medical and leisure uses, but a higher number may be required depending on the nature and location of the development.

Some 4 No. disabled parking spaces are provided for the non-residential spaces which represents 4% of the 57 non-residential car parking spaces. Some 12 No. disabled parking spaces are provided within the residential car parking spaces which represents 4% of the 291 No. spaces provided for the apartments and duplexes (remaining 330 No. spaces are on-curtilage for the houses) and thus meet the requirement of the *Development Plan*. It is considered that all residential in-curtilage car parking spaces are adaptable for universal access. In addition, 3 No. parent and child parking spaces will be provided for the Neighbourhood Centre which represents 4% of the total non-residential spaces and thus meet the requirement of the *Development Plan*.

12.4.5.6 Residential Parking

Within Zone 1, car parking for residential developments has therefore been set as a maximum.

For apartment developments, car parking spaces should be allocated to residential units and visitor car parking. All visitor car parking is to be for short term use and not to be used by residents. Car parking shall be managed as such by a management company. For apartment developments car parking spaces associated with residential units must be sold in conjunction with the units and not sold separately, or let, to avoid take-up by non-residents and will be conditioned as such in the development management process.

Any surface carparking should be suitably integrated into the site with soft landscaping proposals and have regard to SuDS.

Car parking for apartments is provided in accordance with this policy. Car parking spaces will not be sold separately.

12.4.5.7 Parking and Loading Bays

In general, parking bays shall be a minimum 2.4 metres in width and 4.8 metres in length – with increased dimensions required for short-stay retail parking spaces and loading/set down parking areas. The configuration whereby double parking bays are placed length to length is discouraged. Carparking dimensions for in curtilage parking is set out in Section 12.4.8.1 (5.5 metres x 3 metres minimum). Parking bay widths suitable for people with disabilities shall be a minimum of 2.4 metres wide – with a 1.2 metres buffer on both sides – and 6.0 metres in depth.

Parking bay widths suitable for parent and child parking shall be a minimum of 3.3 metres wide, or 5.7 metres if paired with 0.9 metres hatching between the parking spaces.

Parking bays for people with disabilities or parent and child shall be located on firm, level ground, preferably at ground floor level, be in close proximity to access points/lifts and avoid potential conflict points such as ramps, steps etc. All parking bays should be in accordance with Part M of the Building Regulations. The location of disability or parent and child parking bays should be highlighted as part of pre-planning discussions.

Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development.

Please see response below to each relevant element of this policy:

In general, parking bays shall be a minimum 2.4 metres in width and 4.8 metres in length - with increased dimensions required for short-stay retail parking spaces and loading/set down parking areas. The configuration whereby double parking bays are placed length to length is discouraged. Carparking dimensions for in curtilage parking is set out in Section 12.4.8.1 (5.5 metres x 3 metres minimum).

Response: Car parking with a minimum dimension of 2.4 metres x 4.8 metres is provided. In all cases the design of car parking accords with *Section 4.4.9 of DMURS 'On Street Parking and Loading'*. In-curtilage car parking does not accord with the *Development Plan* standards of 5.5 metres x 3 metres min. In-curtilage parking varies across the development. In general bays are 5.3m deep and 2.5m wide. There is various design reasons why this DLR design guidance has not been met including:

- Safety- wider and longer bays would encourage faster vehicle speeds when access and egressing the car parking area in a residential area where the design is to slow vehicle speeds and create a safe urban area in streets designed for people not cars.
- Design Criteria- This car parking requirement is excessive and in our design, the space is used to provide landscaping and access to dwellings, SuDS etc. rather than for parking a car.
In all cases the design of car parking accords with DMURS *Section 4.4.9 On Street Parking and Loading*. We have included this in the Material Contravention Statement enclosed.

Parking bay widths suitable for people with disabilities shall be a minimum of 2.4 metres wide – with a 1.2 metres buffer on both sides - and 6.0 metres in depth. Parking bay widths suitable for parent and child parking shall be a minimum of 3.3 metres wide, or 5.7 metres if paired with 0.9 metres hatching between the parking spaces.

Response: Disabled car parking is provided in accordance with guidance (2.4 metres + 1.2 metre buffer x 6 metres). Parent and child bays provided comply with dimensions.

Parking bays for people with disabilities or parent and child shall be located on firm, level ground, preferably at ground floor level, be in close proximity to access points/lifts and avoid potential conflict points such as ramps, steps etc. All parking bays should be in accordance with Part M of the Building Regulations. The location of disability or parent and child parking bays should be highlighted as part of pre-planning discussions.

Response: Parking complies with Part M. Disabled spaces and parent and child spaces are annotated on MCORM Dwg No. PL601.

Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development

Response: Loading facilities have been provided within the development in accordance with this guidance (4 No. loading spaces provided in total which will be dual purpose).

12.4.6 Cycle Parking

Cycle parking should accord with the Council published – ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018) or any subsequent review of these standards. These are minimum cycle parking standards. In car parking Zones 1 and 2 these minimum standards should be exceeded. It is intended that the next review of the Council’s cycle parking standards would be aligned with the 4 parking zones set out in Section 12.4.5.1 above.

Cycle parking is provided in accordance with these standards. As set out in Section 6.6 of the Traffic and Transport Assessment Report prepared by Atkins, the scheme is in accordance with the ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ . We note that 536 No. bicycle parking spaces are provided for the development in addition to 2 No. cargo parking spaces.

12.4.6.1 Requirements for New Development

With increasing numbers of people cycling and a growing number of options for cycle mobility, including cargo bikes, bike trailers and e-bikes, all of which increase the range of uses and needs, which cycling can respond to, it is essential that well integrated, accessible and secure cycle parking, to cater for all types of cycles, is provided within new developments. This will help to encourage the use of new mobility solutions for everyday mobility needs such as shopping, delivery and school drop off / collection.

It is a requirement that, new residential developments of 5 residential units or more or non-residential type developments of 400 sq. m. or over, submit a Cycle Audit as part of the planning application. The Cycle Audit must be prepared by a suitably qualified person and shall clearly demonstrate, in plan format, how all the requirements of Council’s Standards for Cycle Parking and Associated Cycling Facilities for New Developments, are met within the development.

For new residential developments of less than 5 units and non-residential developments of under 400 sqm planning applications shall include a Cycle Statement, setting out how it meets the requirements of Council's 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments' (2018).

Section 6.6.6 of the Traffic and Transport Assessment prepared by Atkins includes a Cycle Audit for the proposed development.

12.4.6.2 Cycle Parking Assessment Criteria

In general, new residential developments of 5 units or more or non-residential of 400 sq. m. or over will be assessed in accordance with the following criteria:

- *Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of oversized formats (cargo bikes etc)?*
- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?*

Where cycle parking cannot be conveniently provided within the development, a financial contribution of €500 per cycle parking stand will be required to provide alternative on-street cycle parking provision in the vicinity of the development.

Consideration should be given to requiring the provision of cycle parking-related directional signage, in particular for storage and commercial parking facilities. Bike lockers, showers and changing rooms should be available at final destination storage facilities (private).

For short-term cycle parking (e.g. for customers or visitors), cycle parking is required at ground level. This should be located within 25 metres of the destination in an area of good passive surveillance. Weather protected covered facilities should be considered where appropriate. Consideration should be given to using green roofs in the design of standalone cycle parking shelters. Appropriate cycle parking signage may also be required to direct cyclists to the end destination.

For long-term cycle parking (e.g. for more than 3 hours for residents, staff, students), secure covered cycle parking is a requirement. This should be conveniently located within 50 metres of the destination and located near building access points where possible.

In all cases it is a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations.

All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4 metres to facilitate access by cyclists.

Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments.

The cycle parking provision is discussed in the Traffic and Transport Assessment prepared by Atkins. Section 6.6.6 of the Traffic and Transport Assessment prepared by Atkins includes a Cycle Audit for the proposed development. The scheme provides permeable pedestrian and cycle links to the surrounding area through the subject site.

12.4.7 Motorcycle Parking

It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.

The proposed development includes 12 No. motorcycle parking spaces which exceeds the requirement to provide four or more spaces per 100 No. car parking spaces (678 No. car parking spaces provided). Motorcycle parking is provided for residential apartments and duplexes and the Neighbourhood Centre, and can also be accommodated within the curtilage of each house.

12.4.8 Vehicular Entrances and Hardstanding Areas

12.4.8.1 General Specifications

Vehicle entrances and exits shall be designed to avoid traffic hazard for pedestrians and passing traffic. Where a new entrance onto a public road is proposed, the Council will have regard to the road and footway layout, the traffic conditions on the road and available sightlines and will impose appropriate conditions in the interest of public safety. In general, for a single residential dwelling, the maximum width of an entrance is 3.5 metres. For a shared entrance for two residential dwellings, this may be increased to a maximum width of 4 metres. Each car parking space for a residential dwelling shall have a minimum length of 5.5 metres depth to ensure the parked car does not overhang onto the existing public footway and a minimum width of 3 metres to allow for clearance from nearby wall/steps/boundary.

Proper provision shall be made for sightlines at the exit from driveways in accordance with the requirements in DMURS, and as appropriate to the particular road type, and speed being accessed.

Automatic electronic gates into residential developments are not favoured and should be omitted. Electronic or automatic gates are not acceptable in terms of road safety unless the entrance is set back from the back of the footway, to avoid the roadway or footway being obstructed by a vehicle while the gate is opening. In general, outward opening gates will not be considered acceptable. A minimum of a 1.2 metres access path shall be provided for each dwelling. Sufficient space shall also be provided for refuse storage and service metres (Section 12.3.4.7) cycle storage (Section 12.4.6) and urban greening and SUDS (see Section 12.4.8.3).

All accesses are DMURS compliant, appropriate for traffic volumes and have been audited as part of Road Safety Audit.

12.4.11 Electrically Operated Vehicles

To encourage the use of Electric Vehicles (EV), in line with Council, National Policy and Standards, developments shall provide at minimum EV Charging points and infrastructure as follows:

- Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.
- New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.
- Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.
- Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.

Publicly accessible charge point parking space(s) should be clearly marked as being designated for EV charging. Appropriate signage indicating the presence of a Charge Point or Points should also be erected. All Charge Points fitted in publicly accessible areas should be capable of communicating usage data with the National Charge Point Management System and use the latest version of the Open Charge Point Protocol (OCCP). They should also support a user identification system such as Radio Frequency Identification (RFID). Publicly accessible EV Charging locations should also allow for ad-hoc payment methods for users. EV Charging enabling works for disabled and other reserved parking spaces should also be included in the development where these exist.

When detailed Guidance for EV vehicles which is currently in preparation by DLR in association with the other Dublin local authorities becomes available it shall replace the above standards.

The scheme complies with this policy in relation to electric vehicle parking by providing the following:

- Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.
1 No. space per 5 spaces will be fully equipped with a fully functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.
- New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.
Dwellings will be provided with appropriate infrastructure to enable installation of a fully functional EV Charging Point at a later stage.

- *Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.
1 No. space per 5 No. non-residential spaces will be fully equipped with a fully functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.*
- *Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.
1 No. space per 5 No. non-residential spaces will be fully equipped with a full functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.*

12.8 Open Space and Recreation

12.8.1 Landscape Design Rationale

Planning applications for both residential (10+ units or as required by the Planning Authority) and commercial (1,000 sq.m. or as required by the Planning Authority), including leisure and recreational facilities, should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority), for the consideration of the Parks and Landscape Services Department. Smaller schemes may also require a Landscape Plan to be submitted. All such requirements should be ascertained at pre-planning stage.

The design rationale shall set out and specifically indicate how the overall approach is ecologically resilient and provides varied landscapes that reflect the character of the area.

The landscape design rationale should also address the following:

- *Ecosystems services and carbon capture approach.*
- *Urban Greening.*
- *Biodiversity including pollinator friendly approach.*
- *Sustainable Drainage Systems.*
- *Maintenance without the use of chemical.*
- *Nature Based Play.*

Such proposals shall include a scaled Landscape Plan(s) including:

- *Cross-sections, where applicable, indicating the layout and hard and soft treatments of all boundaries, features, external areas, and green spaces.*
- *Specifications for materials, workmanship, and maintenance, together with proposed design details.*
- *Hard landscape details are to include, where applicable, any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features.*

- *Soft landscape details are to include, detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation, and spacings.*
- *A Landscape Plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and a defects liability clause.*
- *Regard should also be had to Policy Objective OSR14: Play Facilities and Nature Based Play.*

A Landscape Rationale and Drawings are included with this planning application prepared by RMDA which addresses these items where relevant. The scheme proposes pollinator species to benefit biodiversity, the greening of the site by providing 659 No. newly planted trees in addition to the 120 No. retained trees, provides details of Sustainable Drainage Systems and notes they are not included in the open space quantum, all external paved and landscaped areas will require low/minimal maintenance and can be maintained without use of chemicals, and the scheme includes a wide variety of play spaces include nature based play e.g. natural stepping stones, planting, stepping logs etc. The scheme provides structured and unstructured play areas incorporating and facilitating nature-based play and maximises inclusivity and accessibility.

In addition, details of sections, materials, maintenance, hard landscaping and soft landscaping are provided throughout the documentation and the relevant policies of the *Development Plan* have been duly considered.

12.8.3 Open Space Quantity for Residential Development

Table 12.8 within Section 12.8.3.1 of the *Development Plan* sets out the following public open space requirements for residential developments:

Location	Public Open Space Standards (minimum)
Residential Development in new residential communities as shown in the Core Strategy - Figure 2.9	15% (of site area)
Residential Development in the existing built up area	15% (of site area)
Institutional and Redevelopment of SNI use	25% (of site area)

The proposed development provides 18,879 sq m of public open space which represents 17.5% of the developable site area. The open space strategy has been detailed in the Landscape Rationale by RMDA and is extracted below:



Figure 8.6: Proposed Location of Play Areas and Exercise Equipment

(Source: Landscape Rationale prepared by RMDA, 2022)

Table 12.9 within Section 12.8.3.2 of the *Development Plan* sets out the following communal open space requirements for apartment developments:

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 bed) ⁴	6 sq m
Two Bedrooms (4 bed)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

The proposed development has the following unit mix and associated communal open space requirement (apartment and duplexes only):

- 27 No. 1 bedroom units (x 5 sq m = 135 sq m)
- 128 No. 2 bedroom units (x 7 sq m = 896 sq m)

⁴ The *Development Plan* states Two Bedrooms (3 bed) and Two Bedrooms (4 bed) however we assume that this should read Two Bedrooms (3 person) and Two Bedrooms (4 person)

63 No. 3 bedroom units (x 9 sq m = 567 sq m)

The total communal open space requirement for the proposed development is 1,598 sq m and this total provided is 2,934 sq m). The communal open space exceeds the requirements of the *Development Plan*.

Table 12.10 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for houses:

Unit Type	Minimum Area per Unit
1-2 bedroom	48 sq m*
3 bedroom	60 sq m
4 bedroom (or more)	75 sq m

* may be acceptable in cases where it can be demonstrated that good quality usable open space can be provided on site.

Private open space has been provided for the houses in accordance with the requirements outlined in Table 12.10.

Table 12.11 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for apartment developments:

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 persons)	6 sq m
Two Bedrooms (4 persons)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

Private open space has been provided for each apartment/duplex in the form of a balcony or terrace in line with the requirements outlined in Table 12.11.

12.8.5.3 Communal Open Space – Quality

Communal amenity space within apartment and/ or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year in accordance with BRE 209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice', (2011). The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme. Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable.

Playgrounds in communal open space areas should be carefully sited within residential areas to ensure they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residences.

The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents within the development. In particular,

accessible, secure and usable outdoor space is a high priority for families with young children, and for less mobile older people.

As detailed in the Landscape Rationale, there are numerous play areas provided in the development. A total of 2,934 sq m of communal amenity space has been defined as part of the landscaping proposition for the development. As shown in the Landscape Rationale by RMDA Landscape Architects, this includes structured and natural play spaces, which are carefully sited.

The proposed areas of public and communal open spaces will receive excellent sun on ground levels as detailed in the Daylight and Sunlight Assessment Report prepared by 3D Design Bureau. The only space that doesn't reach the minimum target for sun on ground is communal open space No. 2 space to the rear of Duplex Block A2. However, each property within Duplex A2 has a private amenity area capable of receiving the recommended minimum level of sunlight. The units also can access the large areas of public open space provided in the scheme.

The communal play areas are located adjacent to the apartments and will thus be subject to natural surveillance. The open spaces will be visible and easily accessible for all persons, including for families with young children and less mobile older people. The communal spaces will be appropriately maintained by a grounds maintenance contractor as detailed in the Lifecycle and Management Report.

12.8.5.4 Roof Gardens

Roof gardens are a valuable form of urban greening (see Section 3.4.4). Consideration of the use of roof gardens as communal open space shall be on a case by case basis and will not normally be acceptable on a site where there is scope to provide communal open space at grade, as roof gardens do not provide the same standard of amenity particularly to young children. Consideration must also be given to the overall design, layout, and location of the roof garden, including its height. For larger apartment schemes in excess of 50 units no more than 30% of the communal open space shall be provided by way of a roof garden.

While recognising that the primary form of communal open space should be provided at grade, where intensive green roofs are being provided in accordance with Section 12.8.6.3 and Appendix 7.2 there may be scope for their use as additional amenity areas in the form of roof gardens. In addition, there may be certain instances such as on smaller town centre infill schemes where there is only scope for a roof garden. Roof gardens will be considered subject to the following –

- *Safety consideration including safe access by children.*
- *Wind and climate assessment.*
- *Daylight and sunlight assessment (on small town centre infill schemes, where all communal open space is provided by way of a roof garden, daylight and sunlight standards should be higher than minimum standards for more than 50% of the development).*
- *Maintenance issues.*
- *Provision of suitable landscaping plans which provide for a diverse range of plants which have year round interest, pollinator friendly and are suitably adapted to the rooftop conditions.*
- *Visual assessment.*
- *Proximity to vents.*

There are no roof gardens proposed in the subject development. There will be communal open space provided at podium level of Apartment Blocks C and D and of the Neighbourhood Centre, and communal open space will also be provided for the duplex blocks.

12.8.6.2 SuDS (Sustainable Drainage Systems)

SuDS measures, such as attenuation storage systems, including detention basins that come into regular operation after rainfall events, shall not normally be included in the calculation of open space provision. Where a SuDS scheme provides biodiversity and amenity value and is readily accessible for either use or enjoyment in most weather conditions, a proportion of the SuDS area could be incorporated as a component part of the communal or public open space provision.

This proportion will be decided by the Planning Authority on a case-by- case basis. The Council will also encourage the use of bioswales in roadside verges, and open spaces.

Further to Section 3.4.4 Urban Greening, data on all surface cover types shall be submitted to the Planning Authority as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems). The Council will consult as appropriate with Iarnrod Éireann in relation to any development where infiltration proposals will be in proximity to a railway cutting or tunnel.

No SuDS measures are included in the open space provision.

In addition, the Engineering Infrastructure Report prepared by Roger Mullarkey and Associates includes a table in response to Section 7.1.5 of Appendix 7 of the *Development Plan*.

12.8.6.3 Green Roofs/Blue roofs

The use of green roofs/blue roofs in accordance with the requirements of the Dún Laoghaire Rathdown County Council's 'Green Roof Policy, (See Appendix 7.2) forms part of an integrated approach to the provision of green infrastructure. This approach takes particular account of the benefits in terms of SuDS provision, nature-based solutions, biodiversity benefits, urban greening, urban cooling, and the potential for additional amenity space, particularly in high density development contexts. The provision of green and blue roofs within any development, however, shall not normally form part of the overall minimum open space (public or communal) provision but should complement the required open space provided within the site. Applications for developments with a roof area $\geq 300\text{sq.m.}$ shall provide Green Roofs in accordance with 'Dún Laoghaire – Rathdown County Council's Green Roof Policy' (2020).

Green or living roofs on smaller structures are also encouraged by the Council. These can function as smaller urban greening measures which as well as being a SUDS feature, are a useful wildlife habitat, can trap carbon and contribute to urban cooling. There is good potential for living roofs on bike and bin stores, bus shelters, detached habitable rooms and garages. Living roofs can be designed to incorporate a diverse range of pollinator friendly species which are drought tolerant and therefore do not require supplementary watering. Added features such as insect hotels and bird boxes can be incorporated into the design.

The Engineering Infrastructure Report & Stormwater Impact Assessment prepared by Roger Mullarkey and Associates sets out the following in relation to the green roof provision:

'Both Intensive and extensive Green roofs are proposed to Apartment Block C/D and the Neighbourhood Centre (NC). Duplex Block D1 is to have Intensive Green Roof only. The minimum percentage coverage required in Appendix 7.2 of the DLRCC County Development Plan is 50% if intensive and 70% if extensive. Each green roof proposed passes the DLRCC minimum requirement % and is summarised in Table 9 below;

GREEN ROOF COVERAGE SUMMARY							
BLOCK REFERENCE	Extensive	Intensive	Total	Building Footprint	% Coverage of Green Roof	Min.% Reqd.	Pass/Fail DLRCC Min. %
NC	1,568	1,390	2958	4,089	72%	60%*	PASS
Duplex D1		664	664	996	66%	50%	PASS
Apt. Block C/D	1,135	795	1,930	2266	85%	60%*	PASS
*The 60% coverage is an average between the Min.50% if Intensive and 70% if Extensive. Each of the NC and Apt. Blk C/D contain both Intensive & Extensive Green Roofs and therefore the average is taken as the minimum percentage requirement.							

Table 9 - Green Roof Coverage Summary

Figure 8.7: Extract from the *Engineering Infrastructure Report & Stormwater Impact Assessment* Demonstrating the Green Roof Coverage

(Source: Roger Mullarkey & Associates, 2022)

In relation to access for maintenance the report states:

'Access for maintenance of the green roofs will be via the internal building stairwells and a roof hatch over. Detailed cross sections of the proposed roof build-up are shown on Dwg.No. 2104/14 included in the submission.'

12.8.7.2 Boundaries

In all cases, suitable boundary treatments both around the side and between proposed dwellings shall be provided. In this regard, boundary treatments located to the rear of dwellings should be capable of providing adequate privacy between properties.

Boundaries located to the front of dwellings should generally consist of softer, more open boundary treatments, such as low-level walls/railings and/or hedging/planted treatments.

Provision of 'defensible' space, e.g. a planting strip, to the front of dwellings should be provided to contribute towards a sense of security within the home. Bin storage and/or utility meter alone, should not form any proposed defensible space areas.

Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule.

Please see Landscape Rationale and Boundary Treatment Drawing (Dwg No. 3) by RMDA. As part of this, various boundary treatments are provided throughout the site layout including 1.8 metre high residential boundary fences between houses and to the rear of some houses, which will allow sufficient privacy between houses. A range of other boundary treatments are proposed such as native hedgerow, evergreen hedgerow, granite feature wall and streetscape feature wall. Boundary screening will be provided around street-level balconies/windows to provide privacy and a sense of defensible space.

12.8.8 Financial Contributions in Lieu of Open Space

Where the required open space standards cannot be provided, the Developer should indicate what is required as per the requirements of the County Development Plan (Section 12.8.), and what is to be provided to serve the development. Applicants should submit a clear schedule with public, private and communal open space requirements and proposals set out along with any short fall. Where the required open space cannot be achieved, the applicant shall provide a contribution in lieu of providing the full quantum of public open space. This shall apply to both residential (including Built to Rent) and non-residential/commercial developments. In some instances, this may relate to a more urban context, which allows the development to contribute to the urban realm and the liveability value of the development in the context of its location by way of a financial contribution. This will take the form of a contribution towards capital investment in improving the urban realm by creating and/or upgrading local parks and spaces and revenue costs for the maintenance of these spaces.

Public open space has been included as part of the proposed development in accordance with the *Development Plan* standards (e.g. in excess of 15% of the site area). Therefore, a financial contribution in lieu of open space is not required.

12.8.9 Play Facilities for Apartments and Residential Developments

In line with the 'Ready Steady Play! A National Play Policy', DCYA (2019) provision should be made to include suitable play opportunities for all ages of the child population within new residential developments. Design details relating to play areas shall be submitted as part of any relevant planning application to include a detailed specification of any playground to be provided and incorporate natural play, wherever possible.

Play Facilities should incorporate the Nature-based play philosophy and approach to play provision throughout the County (see Policy Objective OSR14: Play Facilities and Nature Based Play).

The Council will endeavour to ensure that all play facilities will be accessible and provide inclusivity. The Council will have regard to changing demographics in how and where it provides for play. Multiple Use Games Areas (MUGA) incorporating, for example basketball and 5-a-side facilities will be considered in any calculation of the 'Equipped Play Space' standards.

In terms of play facilities for children regard shall be had to the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018', (or any superseding document), which request consideration of the recreational needs of children in the design of apartment schemes. Safety of children needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces.

Children's play needs around the apartment building should include:

- Within the private open space associated with individual apartments.
- Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,
- Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.

The perimeter block with a central communal open space is particularly appropriate for children’s play, especially if access from the street is controlled. The landscape design and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and this should be designed appropriately.

The proposed development provides ample opportunities for children’s play as detailed earlier in this section, such as in the structured (765.4 sq m) and natural play spaces (600 sq m). Please see below an extract from the Landscape Rationale which demonstrates the location of the various play spaces:



Figure 8.8: Proposed Play Space and Exercise Equipment

(Source: RMDA Landscape Architects, 2022)

Therefore, it is clear that a wide range of play areas have been provided within the proposed development, which are located proximate to buildings and the development fully adheres to the requirements of the *Development Plan*.

12.8.11 Existing Trees and Hedgerows

New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan.

Arboricultural Assessments carried out by an independent, qualified Arborist shall be submitted as part of planning applications for sites that contain trees or other significant vegetation. The assessment shall contain a tree survey, implications assessment and method statement. The assessment of the site in question will inform the proposed layout, in relation to the retention of the maximum number of significant and good quality trees and hedgerows. Tree and hedgerow protection shall be carried out in accordance with BS 5837 (2012) 'Trees in Relation to Design, Demolition and Construction – Recommendations', or any subsequent document. All requirements for Arboricultural Assessment should be determined at pre-planning stage.

The retention of existing planted site boundaries will be encouraged within new developments, particularly where it is considered that the existing boundary adds positively to the character/visual amenity of the area. New developments should have regard to the location of new buildings/extensions relative to planted boundaries. Prior to construction, the applicant shall provide details of adequate measures on site to protect all planting/ trees to be retained and this protection shall be maintained throughout the development during the construction period.

An ecological assessment of existing hedgerows shall be required where new developments potentially impact on their ecological importance. This should be carried out by a suitably qualified ecologist, and submitted at pre-planning stage, to inform the design and accompany the planning application. In addition, the approach set out in the 'How to Guide Hedgerows for Pollinators' should be followed, as appropriate.

Where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planting or replacement trees and other plant material. This will be implemented by way of condition. A financial bond may be required to ensure protection of existing trees and hedgerows during and post construction.

An Arboricultural Assessment has been carried out by Arborist Associates Limited. The Arboricultural Assessment prepared notes that:

'The current site layout has been finalized and modified based on the information provided in the initial condition tree assessment of the site area and the creation of the tree constraints plan (DWG. No.KVL001) which has resulted in changes in the layout of buildings and services and its construction plan to ensure that any impact on the trees to be retained have been kept to a minimum.

The objective of the proposed development layout was such as to try and retain as much of the important tree lines, groups and belts as possible and to incorporate these into the completed development where they will be an asset to the completed landscaped development and the surrounding area.

... In the design layout, great efforts have been made to retain as many of the better quality trees and in particular the trees within tree belts or groups which are of most visual value to the treescape of this area with the main tree belts running through the centre of the site being incorporated into its main open space areas.

The loss of the above listed tree vegetation is being mitigated against with the planting of trees, shrub and hedging as part of the landscaping of the completed development which will complement the development and its incorporation into the surrounding area. It will also help to provide good quality and sustainable long-term tree cover, and as this establishes and grows in size, it will be continuously mitigating any negative impacts created with the loss of the existing tree vegetation to facilitate the proposed development. See landscape architects drawings and schedules for detail.

The planting strategy key factors are to:

- Create a sense of identity using trees, shrub and hedge planting.*
- Create a robust landscape that performs all year round and is suitable for the current proposed use of this site area.*
- Use vegetation to screen and enhance views.*
- Use a more diverse mix of plant species that will include good pollinators.*
- Plant robust species that tolerate drought and site-specific micro-climates*
- Plant species that are maintenance friendly.'*

The relevant numbers in relation trees within the subject site are outlined below:

Existing	186 No.
Retained	120 No. (64.5%)
Removed	66 No. (35.5%)
Proposed	659 No.

Therefore, it is clear that the tree planting will far exceed the existing situation on site which will benefit the biodiversity of the area.

12.9.2 Noise Pollution and Noise Nuisance

The Planning Authority will have regard to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023', when assessing planning applications along major road and rail transport corridors – the objective being to reduce noise from new sources and to identify and protect and create areas of low sound levels.

Residential development should be set back from roads/rail lines such that amenities of residents are not unduly impacted upon by reason of noise. To address potential noise issues at post development stage, mitigation measures should be undertaken, where appropriate, between the residential development and road/rail line. At design stage consideration should be given to the location of

bedrooms so as to ensure the least possible impact from noise sources. Similar mitigation measures may also be required when dealing with commercial development in close proximity to residential areas where there may be noise generated from the completed development – such developments will be assessed on a case by case basis.

The Planning Authority will use the Development Management process for larger developments or developments close to residential developments:

- To attach planning conditions on relevant permissions granted to reduce or prevent the development from causing any noise or vibration that might give reasonable cause for annoyance to persons in any premises in the neighbourhood, as per Section 34(4)(c) of the Planning Act.
- To require developers to produce a Sound Impact Assessment and Mitigation Plan where a noise-generating use is proposed and specialist input is deemed necessary, for any new development that the Planning Authority considers will impact negatively on pre-existing environmental sound levels.
- To require developers to produce an Acoustic Design Assessment (informed by guidance such as is set out in 'ProPG Planning and Noise', 2018, as referenced in the 'Dublin Agglomeration Noise Action Plan 2018 – 2023'), where a noise-sensitive use is proposed in an area that may have high pre-existing environmental sound levels.
- To ensure that future developments are designed and constructed in such a way as to minimise noise disturbances and prevent noise nuisance.
- Placing acoustic barriers between the noise source and residential units.
- Locating bedrooms as far away from noise sources as possible without compromising passive design principles.
- Locating windows away from noise sources if possible.
- Avoid hard exterior surfaces such as concrete paving that reflect sound rather than absorbing it.
- Locating noise sources away from property boundaries and noise sensitive areas.
- To incorporate 'Shared Spaces'/'Home Zones'/'Streets for People' in new developments, which recognize that residential streets have multi- function uses for pedestrians, cyclists and vehicles - in that priority order.
- To interposing less-sensitive uses between noise sources and sensitive uses.

Where noise barriers are provided at the boundaries of large developments, access routes must be provided to allow for the ongoing maintenance of the barriers.

An Acoustic Design Statement has been prepared by RSK Ireland Limited. This Report has been prepared with due consideration of Section 12.9.2 of the *Development Plan*. For example, the following mitigation measures are proposed in relation to noise:

- Provision of glazing with minimum sound insulation properties.
- Provision of acoustic attenuation to ventilation systems for dwellings outlined in the Report.

12.9.4 Construction Management Plans

Construction Management Plans (CMP) for developments generating construction activity - containing measures to mitigate against the effects of the construction - shall accompany planning applications for development of 3 residential units or more and for all other developments measuring more than 500 sq.m. gross floor area. The requirement to submit a CMP is very much dependent on the location, scale, nature, and characteristics of the proposed development. Consequently, the stated thresholds above may be increased or relaxed at the discretion of the Planning Authority during pre-planning stage discussions.

The CMP will address issues such as traffic management, hours of working, delivery times, prevention of noise and dust, reinstatement of roadway lining and signing, repair of damage to footways and grass verges and the accommodation of worker parking within the development curtilage. Hours of construction and deliveries should normally be in accordance with the guidance set out in Section 12.9.5 below. Refer to Section 12.9.6 below for more detailed requirements of the CMP.

An Outline Construction Management Plan prepared by Atkins and a Construction Environmental Management Plan prepared by Enviroguide Consulting are submitted with this planning application.

12.9.6 New Development/Change of Use - Environmental Impacts

The Development Management Thresholds Information Document 2022 - 2028 (Appendix 3), a tool to assist in the preparation of Planning Applications, identifies thresholds for both residential and commercial development and outlines the package of environmental information that will be required at application stage.¹

Applications for developments with a site area measuring 0.5ha, or greater and above 50+residential units shall include a Stormwater Audit in accordance with the Council's Stormwater Management Policy. (See Appendix 7.1 Stormwater Management Policy)

Applications for developments of 10+ residential units or <500sq.m. commercial shall include:

A Construction Management Plan that includes the following elements (which can be standalone documents):

- i. A Construction Waste Management Plan.*
- ii. A Construction Environmental Management Plan.*
- iii. A Construction Traffic Management Plan.*

An Operational Waste Management Plan.

The formulation of the above plans shall take account of the following:

- i. *DLR Guidance Notes for Environmental Management of Construction Projects.*
- ii. *DLR Guidance Notes for Waste Management in Residential and Commercial Developments (see relevant excerpt in Appendix 6).*

- *Applications for developments of 20+ residential units or ≥ 500 sq.m. commercial shall (in addition to the above):*
- *Submit, prior to commencement of development, details of a Sediment and Water Pollution Control Plan in relation to the construction phase of such developments.*
- *Implement an appropriate rodent/pest control plan.*

Applications for developments of 50+ residential units or ≥ 1000 sq.m. commercial shall (in addition to the above):

- *Incorporate where appropriate land for the development of local 'Bring Centres' for recyclable materials, accessible to the general public.*
- *Include an assessment of the impacts of climate change on their development and make provision for these impacts – particularly relating to drainage design, waste management, and energy use.*
- *Be designed and constructed in accordance with the provisions of the Greater Dublin Strategic Drainage Study policy document titled 'New Development'.*

All developments shall incorporate:

- *Designs and layouts for basements and underground car parks that do not result in any potential for them to flood from within or without with particular emphasis on venting arrangements and access ramps.*
- *Sustainable Drainage Systems (SuDS) that balances the impact of urban drainage through the achievement of control of run-off quantity and quality and enhances amenity and habitat. The requirements of the UK's Construction Industry Research and Information Association (CIRIA) 'SuDS Manual', shall be followed unless specifically exempted by the Planning Authority.*
- *Waste storage facilities that are suitably located and designed and shall meet accessibility requirements in accordance with Part M of the Building Regulations and the provisions of Appendix 6 Waste Storage Facilities.*

The Planning Authority will:

- *Not permit culverting of streams unless considered absolutely necessary by the Council's Water Services Section.*
- *Encourage the opening up of existing culverts where practicable (in accordance with the recommendations of the GDSDS).*

- *Require in developments adjacent to watercourses, that any structure be set back a minimum distance of 10 metres from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority.*
- *Only permit development when satisfied that new and existing developments are not exposed to increased risk of flooding and that any loss of flood storage is compensated for elsewhere in the catchment. Where required, a site-specific Flood Risk Assessment and Management Plan, shall be prepared for the site. This shall be carried out by appropriately qualified engineers with significant experience in flood modelling and mapping.*
- *When considering planning applications which include significant hard surfacing, attach conditions which seek to minimise and limit the extent of hard surfacing and paving as well as requiring the use of sustainable drainage techniques, including in particular permeable paving or surfaces such as gravel or slate chippings. The aim generally being to reduce run-off rates and flow volumes from parking areas as well as access roads. For all developments where existing grass or planted areas are being removed to install hard surfacing (for parking or other uses) compensatory soft surfacing shall be provided, or a reinforced grass area used instead of a hard surface.*
- *Ensure that the ongoing development of the County is undertaken in such a way in order not to compromise the quality of surface water (and associated habitats and species) and groundwater. Developments shall not give rise to the pollution of ground or surface waters both during construction and subsequent operation. This shall be achieved through the adherence to best practice in the design, installation, and management of systems for the interception, collection and appropriate disposal or treatment of all surface water and effluents.*
- *Where brownfield redevelopment is proposed, require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work.*

Atkins have prepared an Outline Construction Management Plan and Enviroguide Consulting have prepared a Construction Environmental Management Plan (which includes construction traffic and site access details). A Construction and Demolition Waste Management Plan and an Outline Operational Waste Management Plan prepared by Enviroguide Consulting are also included with this planning application. These reports include details on these items where relevant.

12.9.8 Telecommunications

In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:

- *Compliance with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996), and Circular Letter PL 08/12 issued by the Department of the Environment and Local Government (as may be amended from time to time), and to other publications and material as may be relevant in the circumstances.*
- *On a map the location of all existing telecommunications structures within a 1km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing*

facilities having regard to the 'Code of Practice on Sharing of Radio Sites', issued by the Commission for Communications Regulation.

- To what degree the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area - e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc. – and the potential for mitigating visual impacts including low and mid – level landscape screening, tree-type masts being provided where appropriate, colouring, or painting of masts and antennae, and considered access arrangements.
- Any impacts on rights-of-way and walking.
- That the proposal shall not have a significant negative visual impact.

The *Telecommunications Report* prepared by Independent Site Management Limited states the following:

'To provide an adequate allowance for the retention of the 2No. identified Microwave links that will be impacted by the Development, the Applicant is seeking planning permission to install 3No. support poles, affixed to the lift shaft overrun on the Development's neighbourhood centre block B, rising 3metres above roof level.

These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each (together with associated telecommunications equipment), which provides an adequate solution for the Applicant to mitigate the impact the Development will have on the existing Microwave links emanating from the existing mast currently within the development site boundary, as well as providing some capacity for future links that may or may not be required.

To provide an adequate allowance for the retention of the 6No. identified Radio Frequency links that will be impacted by the Development, the Applicant is seeking planning permission to install 9No. support poles, affixed to ballast mounts on neighbourhood centre block B rising 2.5 metres above parapet level.

These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each (together with associated telecommunications equipment), which creates the ability for the Applicant to mitigate the impact the Development will have on the existing Radio Frequency links emanating from the mast within the development site, as well as providing some capacity for future links that may or may not be required.

To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds.'

The proposed microwave links comply with the Guidelines and Circular and Section 12.9.8 of the *Development Plan* on the basis that:

Sub-Point 1 is satisfied as the proposal is designed to comply fully with the policies laid out in the DEHLG's *Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities (1996)* or any such guidelines which supersede it.

Sub-Point 2 is satisfied. The Telecommunications Report (*Area Telecommunication Analysis*) details the existing telecommunications structures in the immediate area and confirms that aside from the 1 No. 2 operator structure (as detailed therein) which is proposed to be retained by this application), no other structures exist within c. 2 km radius of the application site. The existing telecommunications development at the application site (which it is proposed to be retained by this permission) is feasible to be shared given the nature of that development and the amount of equipment to provide for Three Ireland, Eir Mobile and Vodafone Ireland's technical and operational requirements to overcome the target coverage areas and blackspots for these 3 No. operators and should it not be retained coverage for the c. 2 km radius will be so greatly diminished that no voice or data services on any mobile network will be achievable.

Sub-Point 3 requires that impacts on the amenities of occupiers of nearby properties or the amenities of the area – e.g. visual impacts of the mast is assessed. Given the nature and scale of the development and the fact that the equipment will be adequately screened, it is considered that any impacts are considered to be moderate at worst and therefore with acceptable limits given the installations purpose. Wider and more distant public and private views from the surrounding area are restricted by the existing built development in the local area and so negative impacts are localised. The Verified Views and Computer Generated Images prepared by 3D Design Bureau demonstrate that the telecommunications infrastructure will not have a negative visual impact on the area.

Sub-Point 4 is satisfied. The application site is not located on a Right of Way and being on a rooftop where access is restricted to authorised persons only, there are no impacts on walking for the wider public.

Sub-Point 5 is satisfied. The telecommunications infrastructure has been sited at rooftop level of the Neighbourhood Centre and as demonstrated in the Verified Views and Computer Generated Images prepared by 3D Design Bureau, they will have minimal presence in the landscape and will not have any visual impacts.

12.9.9 Development and Overhead Power Lines

In relation to high voltage overhead electricity lines, development proposals within the distances specified below should contact the ESB in advance of completing or finalising designs etc. (i.e. prior to pre planning stage), so as to ensure that the relevant clearances are maintained from any High Voltage Overhead Electricity (HV OHL) Infrastructure.

- *For buildings in proximity to a 110kv overhead line, 23 metres either side of the centre line of a pylon.*
- *For buildings in proximity to a 220kv overhead line, 30 metres either side of the centre line or around a pylon.*
- *For buildings in proximity to a 400KV line, distance of 35 metres either side of the centre line or around a pylon.*

For buildings in proximity to a 10kv or a 38kv overhead line, no specific distance is specified. However, a site specific clearance may be required.

Clearances are Site and Transmission Line Span Specific. Clearance are sperate to construction safety clearances to be adhered to and maintained from the Overhead Line (OHL), which are specified in the ESB publication, 'Code of Practice for avoiding danger from overhead electricity lines' https://www.hsa.ie/eng/publications_and_forms/publications/codes_of_practice/code_of_practice_for_avoiding_danger_from_overhead_electricity_lines.html.

The proposed development has been designed to ensure that buildings' proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.

12.9.10 Public lighting

12.9.10.1 Light Pollution

Lighting columns and other fixtures can have a significant effect on the appearance of buildings and the environment and where proposals for new lighting require planning permission, the Planning Authority will ensure that they are carefully and sensitively designed. Lighting fixtures should provide only the amount of light necessary for the task in hand and shield the light given out in order to avoid creating glare or emitting light above a horizontal plane. (Refer also to Section 8.2.4.4 and Section 5.1.3.2) For further guidance refer to the Institution of Lighting Professions (ILP) 'Guidance Notes for the Reduction of Obtrusive Light'.

The lighting layout has been guided by the Institution of Lighting Professions (ILP) 'Guidance Notes for the Reduction of Obtrusive Light'. The lighting configuration has been carefully selected to achieve recommended illuminance levels whilst minimising light spill and avoiding over lighting. This is achieved by a combination of optimised column height, luminaire Wattage, optical setting and column location for each road configuration. All luminaires proposed have high performance street lighting specific optics designed to get the light onto the target area thus minimising spill light. All luminaires proposed have a 0 degree tilt. The ULR of all proposed column mounted luminaires is 0%. All luminaires are to be warm white colour temperature with peak wavelength of above 550nm. All column mounted luminaires are to be fitted with photocells which automatically switch luminaires on during night time and off during daytime. Additionally, all column mounted luminaires are to automatically dim by 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.

12.9.10.2 Street Lighting

The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015, and further updates.

In general, for security and road safety reasons, street lighting may be provided for car and cycle parking areas, new access roads and along cycle/pedestrian routes within new developments, all as per the Council requirements. Details of the column height and spacing, and lantern type, lighting class and lux levels and energy efficiencies shall be provided. Low pedestrian lighting bollards (1 metre to 2 metre height), under rail lighting and low-level wall mounted lighting (below 4m) are not recommended along pedestrian routes on electrical safety and maintenance grounds. Where new junctions are created as a result of new developments, additional lighting poles may be required on the public roads opposite the junction. In such cases an assessment of the adequacy of the street lighting should be undertaken with details of light intensity/ lux levels provided.

Residential areas are designed in accordance with EN13201-2:2015 Category P4. Lighting category was derived as per the methodology of EN13201-1:2014. The full technical details of the proposed luminaires and configuration are detailed on the public lighting calculation report and the public lighting layout. We have taken into consideration any existing luminaires in close proximity of the proposed new junctions and we have calculated the illuminance levels to meet an appropriate lighting levels of EN13201-2:2015 (C class). The proposed under rail lighting for the step sections is electrical class III (Extra low voltage) and IK10 impact resistant. Bollard lighting is proposed for areas of high ecological importance and the proposed bollard is IK10 impact resistant. 1 metre bollards are selected for the woodland footpath sections due to high degree of ecological importance. Market leading LED light fittings have been selected to provide the required lux levels in all areas; LED light emitters have excellent directional properties and the fittings selected will have provide warm white lighting with a colour temperature of 2700 Kelvin (Woodland bollards to have 1750 Kelvin colour temperature).

The design will seek to provide only the minimum required lux levels, (5 lux average with 1 lux minimum on residential roads & pedestrian routes) ensuring no excessive lighting levels are provided. Column heights, positions and the luminaire photometry have been carefully selected for each area of the site. 6m columns have been selected for general public lighting, 5m columns for pedestrian routes. 8m Columns are required for the boundary link road. The LED column luminaires will be positioned with tilt angles of 0 degrees delivering 0% direct upward light spill. Column mounted luminaires are to automatically dim to 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.

12.10 Drainage and Water Supply

All planning applications submitted shall clearly show existing and proposed water supply arrangements and surface and wastewater drainage proposals having due regard to SuDS (Refer also to Section 10.2.2.6).

The existing and proposed drainage and water supply layout drawings are included in the application and have been agreed in principle with the DLRCC Drainage Department, have been assessed in detail and agreed by Irish Water and have been SuDS audited in accordance with the DLRCC Stormwater Management Policy.

12.10.1 Flood Risk Management

Applications shall adhere to the policies and objectives set out in Appendix 15 Strategic Flood Risk Assessment and Section 10.7 Flood Risk while having regard to 'the 'Planning System and Flood Risk Management' Guidelines for Planning Authorities' DEHLG (2009) and DECLG Circular PL2/2014.

The Flood Zone maps accompanying this Plan and Appendix 15 should be consulted at pre-planning stage and/or prior to lodgement of planning applications.

Although the site is located in a Flood Zone C area (low risk), Roger Mullarkey & Associates have carried out a Flood Risk Assessment which is enclosed separately.

8.1.4 Compliance with the Other Relevant Policy Objectives of the *Development Plan*

Please see below for policy objectives of the Development that are relevant to the subject development:

Policy Objective CS11: Compact Growth

It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES).

The proposed scheme involves the development of a key underutilised site in Kiltarnan Village that is currently experiencing a transition and change in character from lower density dwellings to higher density apartment schemes. Therefore, the proposed development will represent compact growth, which is in accordance with Policy Objective CS11.

Policy Objective CS14: Vacancy and Regeneration

It is a Policy Objective to address issues of vacancy and underutilisation of lands within the County and to encourage and facilitate the re-use and regeneration of vacant sites subject to the infrastructural carrying capacities of any area.

The proposed development represents the appropriate densification of this strategically located site, contributing positively to the reuse and regeneration of underutilised lands in the area. The area has sufficient capacity to cater for the proposed development especially having regard to the Confirmation of Feasibility and Statement of Design Acceptance received from Irish Water.

Policy Objective CA7: Construction Materials

It is a Policy Objective to support the use of structural materials in the construction industry that have low to zero embodied energy and CO₂ emissions. (Consistent with the RPO 7.41 of the RSES).

Should a decision to grant planning permission be made, environmentally considerate options relating to construction and materials will be pursued.

Policy Objective CA8: Sustainability in Adaptable Design

It is a Policy Objective to promote sustainable approaches to the improvement of standards for habitable accommodation, by allowing dwellings to be flexible, accessible and adaptable in their spatial layout and design.

A wide range of dwelling types and sizes are proposed. The needs of a variety of households will therefore be met. The following unit sizes are all proposed: 1 No. bedroom, 2 No. bedroom, 3 No. bedroom and 4 No. bedroom units, with the range of typologies split between houses, duplexes and apartments. The range of different typologies will cater for different/emerging living requirements and in terms of flexibility, the option to downsize or extend is provided for. This advantage of the adaptability of the proposed scheme will form a strong community within the development for many years to come.

Easy resident and visitor access is provided for throughout the scheme. The apartment buildings are subdivided into distinct zones, with level access for each core provided from the

perimeter footpaths. In each apartment core there is a stairs and an accessible lift, serving all floors and linking car parking, bin stores and ancillary areas.

The design of the buildings are all in accordance with Part M of the Building Regulations and will also have regards to the principles of universal access. This will foster an inclusive approach to the design of the built environment.

Policy Objective CA16: Low Emission Vehicles

It is a Policy Objective to support and facilitate the rollout of alternative low emission fuel infrastructure through the Development Management process, prioritising electric vehicle infrastructure.

The proposed development provides 73 No. electric vehicle charging spaces. Additional ducting will be provided to allow for retrospective installation of additional charging points. In curtilage car parking spaces can easily be EV compliant.

Policy Objective CA17: Electric Vehicles

It is a Policy Objective to support, the Government’s Electric Transport Programme by progressively electrifying our mobility systems by facilitating the rollout of Electric Powered Vehicle Recharging Parking Bays across the County and on public roads and other suitable location. The provision of e-bike chargers will be supported subject to the availability of Funding. (Consistent with NSO 4 of the NPF and RPO 7.42 of RSES).

As noted above in response to Policy Objective CA16, the proposed development provides 73 No. electric vehicle charging spaces. Additional ducting will be provided to allow for retrospective installation of additional charging points. In curtilage car parking spaces can easily be EV compliant.

Policy Objective CA18: Urban Greening

It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).

The proposed development provides a large quantum of public and communal open space including play spaces, kick-about spaces, pedestrian routes, outdoor gym equipment and seating areas. The SUDS measures include green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices. The open spaces will also provide pathways for pedestrians and cyclists especially due to the provision of the Dingle Way (Greenway) through the site which will connect Enniskerry Road to the future GLDR. Therefore, it is clear that the proposed development promotes urban greening and will contribute to healthy placemaking and supports the health and wellbeing of the living and working population.

Overarching Policy Objective PHP1:

That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:

- *Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.*
- *Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment.*
- *Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.*

As set out in Section 6.2 and 7.2 of this Report, the proposed development aligns with the provisions of the NPF and the Eastern and Midlands Regional Spatial and Economic Strategy. The proposed development will create a new community in a Village Centre and in an area that is currently in transition from lower density dwellings to higher density schemes and will provide public and communal open spaces in addition to a Neighbourhood centre, which will serve the future residents of the scheme and the wider public.

The Social Infrastructure Audit notes that the proposed Neighbourhood Centre will positively contribute to the amenity of the existing and future resident population. The Neighbourhood Centre contains 2,512 sq m of commercial space will also be provided including a creche, office, medial, retail, retail (convenience) and a community centre. The development will deliver 383 No. residential units and a Neighbourhood Centre in this new residential community and will thus accord with the Core Strategy by 'supporting the transition to a low carbon and climate resilient County through the implementation of a compact growth agenda, increased integration between land-use and transportation, increased sustainable mobility and, the sustainable management of our environmental resources', as set out in Section 2.4.2 of the Development Plan. The public transport in the area also has capacity to serve the proposed development.

Policy Objective PHP2: Sustainable Neighbourhood Infrastructure

It is a Policy Objective to:

- *Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- *Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- *Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.*

The scheme will provide much needed housing for the area and will also provide a Neighbourhood Centre in the centre of Kiltiernan Village which will protect and improve sustainable neighbourhood infrastructure for the area. The scheme will be accessible and

inclusive as confirmed by the Universal Access Statement prepared by MCORM. The open spaces and commercial floorspace will be multi-functional as they will provide various spaces for toddlers, children and adults.

Policy Objective PHP3: Planning for Sustainable Communities

It is a Policy Objective to:

- Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide' and any amendment thereof.
- Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2).
- Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/redevelopment areas and existing residential neighbourhoods.
- Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.

Please refer to Section 6.8 of this Report for a fully detailed response to the relevant aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide'.

The Social Infrastructure Audit notes the following:

'This Social Infrastructure Audit has identified and established the level of existing social infrastructure provision within and bordering the c.2km study area to support the needs of the existing population and offered insights into the likelihood of the capacity of the existing services and facilities to support future residents. The baseline study undertaken identified a significant range of services and facilities which contribute to quality of life for residents, with more than 150 no. social services and facilities were identified within proximity to the subject site.

We also note that the proposal includes a Neighbourhood Centre, which will provide a creche (439 sqm), office (317 sqm), medical (147 sqm), retail (857 sqm), convenience retail (431 sqm) and a community facility (321 sqm) which will positively contribute to the amenity of the resident population once completed., the proposed development provides a high-quality Neighbourhood Centre which will include retail, retail (convenience), creche, medical, office and a community centre, which will ensure that an appropriate level of supporting neighbourhood infrastructure is provided for in this new residential community.'

In addition, the public and communal open spaces are high quality, attractive and liveable spaces where the residents and/or public will have the opportunity to interact with each other ensuring an integrated community within the scheme which will create a healthy and attractive place to live.

Policy Objective PHP5: Community Facilities

It is a Policy Objective to:

- *Support the development, improvement and provision of a wide range of community facilities throughout the County where required.*
- *Facilitate and support the preparation of a countywide Community Strategy.*

As noted above, a Neighbourhood Centre is provided within the proposed development which will improve the provision of community facilities in the County, especially with the provision of a new Community Centre.

Policy Objective PHP18: Residential Density

It is a Policy Objective to:

- *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.*

The proposed development represents the consolidated and re-intensification of these underutilised, infill Village Centre lands with much needed higher density residential units (in addition to a Neighbourhood Centre), which will contribute positively towards addressing the national housing crisis. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised.

The area is currently transitioning in character from lower density housing to higher density development and thus the proposed development can be appropriately assimilated into the surrounding environment. Having regard to the results of the Daylight and Sunlight Assessment and the Landscape and Visual Impact Assessment, the proposed development will not have a material impact on surrounding residential amenity. A fully detailed response to the relevant development management criteria of Chapter 12 is provided above in Section 8.2.3.

Please also see response to Policy Objective PHP20 below which is relevant to density and height.

Policy Objective PHP19: Existing Housing Stock – Adaptation

It is a Policy Objective to:

- *Conserve and improve existing housing stock through supporting improvements and adaption of homes consistent with NPO 34 of the NPF.*

- *Densify existing built-up areas in the County through small scale infill development having due regard to the amenities of existing established residential neighbourhoods.*

The proposed development represents the appropriate densification of the subject lands which includes removing the derelict dwelling known as 'Rockville' and associated derelict outbuilding and providing 383 No. residential dwellings and a Neighbourhood Centre. The subject scheme will result in the appropriate densification of an underutilised site, providing additional accommodation in lieu of the existing derelict dwelling and outbuildings, which are not considered to be distinctive or of architectural merit and do not represent sustainable use of well-located lands in the context of contemporary planning policy, which seeks to more appropriately and efficiently use scarce urban land. In addition, we note that these structures are not Protected Structures.

The proposed layout of the development includes a mix of houses, apartment blocks, duplexes and a Neighbourhood Centre with large open spaces and pedestrian routes, which allows the development to breathe and ensures the proposal is not monolithic. The Daylight and Sunlight Report and the Landscape and Visual Impact Assessment enclosed as separate documents both demonstrate that no material impacts will occur as a result of the proposed development.

The following 2 No. Policy Objectives relate to Building Height:

Policy Objective PHP20: Protection of Existing Residential Amenity.

It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.

Policy Objective PHP42: Building Design & Height

It is a Policy Objective to:

- *Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).*

This Planning Report & Statement of Consistency and Material Contravention Statement enclosed have assessed the height of the proposed development against the Building Height Strategy in Appendix 5 (in particular Table 5.1) and it is considered that the proposed heights are appropriate and can be assimilated into the surrounding environment. As noted above, it is considered that the proposed scheme strikes a balance between respecting the surrounding environment and ensuring the development potential of a strategically positioned and underutilised plot is maximised. The derelict structures on site to be demolished are not considered to be distinctive or of architectural merit and are not considered to represent sustainable continued use of strategic lands in the context of contemporary planning policy which seeks to more appropriately and efficiently use scarce urban land. In addition, we note that the structures are not Protected Structures.

The Daylight and Sunlight Report and the Landscape and Visual Impact Assessment enclosed as separate documents both demonstrate that no material impacts will occur as a result of the proposed development.

The following is also stated under Policy Objective PHP20 (black text) with a response provided underneath each point (in purple text):

A response to each point of this policy is provided below in purple:

- *On all developments with a units per hectare net density greater than 50, the applicant must provide an assessment of how the density, scale, size and proposed building form does not represent over development of the site. The assessment must address how the transition from low density to a higher density scheme is achieved without it being overbearing, intrusive and without negatively impacting on the amenity value of existing dwellings particularly with regard to the proximity of the structures proposed. The assessment should demonstrate how the proposal respects the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring uses.*

Response: The proposed development is in accordance with the density parameters for the site set out in the *Kiltarnan LAP* (see Section 8.0) and the development does not represent overdevelopment of the site and is generally detailed below for ease of reference:

Although the net density of the proposed development is 44.5 No. units per hectare (and thus does not exceed 50 units per hectare outlined in the bullet point above), we have provided an assessment of how the density, scale, size and proposed building form does not represent over development of the site in order to provide a robust rationale for the building height strategy.

The *Development Plan* recognises the need to increase residential densities as a means through which to secure sustainable development that more appropriately and efficiently uses existing urban land resources. In this respect, the *Development Plan* states:

'Density plays an important role in ensuring that the best use is made of land intended for residential development. The Development Plan seeks to maximise the use of zoned and serviced residential land. Consolidation through sustainable higher densities allows for a more compact urban growth that, in turn, more readily supports an integrated public transport system. This together with the '10-minute' neighbourhood concept, has the potential to reduce the urban and carbon footprint of the County.'

Specifically, the Council expresses this stance as Policy Objective PHP18 (Residential Density):

'It is a Policy Objective to:

 - *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*

•Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.'

However, the *Development Plan* does not prescribe specific densities (other than a general default minimum of 35 uph) and ultimately states that they will be considered in accordance with *Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities*. These Guidelines discuss densities in relation to development (1) in city and town centres, (2) on brownfield sites (within city or town centres), (3) along public transport corridors, (4) in inner suburban locations and on infill sites, (5) on institutional lands and (6) on outer suburban and greenfield sites. Ultimately, the Guidelines do not set maximum density standards, with minimum ranges (35–50 uph) provided only for development on institutional lands and outer suburban and greenfield sites.

Based on the definitions provided in the Guidelines, the subject site can be considered as being an inner suburban location and on an infill site in the centre of Kiltiernan Village (which will fill a gap between the Rockville residential development and Enniskerry Road). It could also be considered that the site is an outer suburban and greenfield site and could be considered proximate to a public transport corridor with the Ballyogan Wood LUAS stop located c. 2.3-c. 2.7 km to the north-east of the site (c. 27-31 No. minute walk).

Dublin Bus route No. 44 serves the Kiltiernan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kiltiernan within the Bus Connects scheme, such as Routes No. 88, L26, L13 and P13 which will all serve Kiltiernan Village and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area such as University College Dublin. Access to the M50 Carrickmines (Exit 15) is also located c. 1.9-2.3 km from the subject site.

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines (Exit 15) and the proposed GDRS scheme which will reduce traffic passing through the village, this makes Kiltiernan Village a hub for activity and increases the area's potential to become a model suburban village.

Therefore, there is a strong policy base to support a notable residential density at this site.

This is augmented by the *NPF*, which recognises the benefit of securing greater densities in existing urban areas to achieve scale, critical mass, vibrancy and a positive shift in infrastructural use:

'Well designed and located higher density housing will assist:

- Fast-growing urban areas to achieve much needed scale;*
- Medium-sized urban areas to find a route to quality in a new competitive framework;*
- All urban areas to increase vibrancy and vitality;*
- Increased efficiency and sustainability in the use of energy and public infrastructure.'*

Asserting this as a policy stance, the *NPF* includes National Policy Objective 35, which is to:

'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.'

Evidently, there is a strong policy base to support the attainment of higher residential densities, even in areas where there may be prevailing low density patterns of development. Such patterns of development are no longer deemed to be sustainable in many cases, and it is asserted that their presence must not be used as a means to preclude the realisation of more dense developments.

With 383 No. units proposed across the net site area of 8.6 Ha, the proposal will yield a net density of 44.5 uph. Whilst this could be recognised as an increase on the prevailing density locally, it is considered to be a progressive and necessary uplift to ensure a sustainable use of the site, especially given that the area is currently transitioning from lower density detached dwellings to higher density schemes providing a range of housing types. The majority of the scheme ranges in height from 2-3 No. storeys across the site. However Apartment Blocks C and D to the north-east of the site extend to 5 No. storeys including podium level. The apartment blocks are located at the proposed entrance from Glenamuck Road and can be readily absorbed without any undue impact on the character of the area or the amenity of neighbouring properties. We note that there is a 4 No. storey apartment block in the neighbouring Rockville development to the north-east, which is located on the boundary of our Client's lands. The Neighbourhood Centre provided close to Enniskerry Road fronting a newly proposed Village Green will reach 4 No. storeys in height and will provide a meeting point in the centre of the village for the residents and local community to interact. Furthermore, the scheme supports the *NPF's* National Policy Objectives and the 'Compact Growth' National Strategic Outcome by delivering a new residential community within the existing built-envelope of the County and wider city region.

There are no impediments to the proposed residential yield and density for the following 2 No. reasons:

There is proven to be adequate capacity in the local area's hard infrastructure (roads, public transport and water services) especially due to the construction of the future GLDR which is planned to begin in Q3/Q4 2022.

There is adequate capacity in local soft infrastructure (schools, childcare and community and social services) and with the provision of the Neighbourhood Centre, the availability of retail, retail (convenience), medical, office, a creche and a community centre will further enhance this availability of local services.

Ultimately, density is just a ratio of the number of residential units relative to a site area. Therefore, if the necessary infrastructure can accommodate a given residential yield and density, then the key consideration is how the development delivers the units in terms of the height, bulk, scale and massing of the built-form. This is of paramount importance, as the physical expression of buildings can then have impacts on daylight and sunlight, overlooking, overbearance and obtrusion; a point that the

Development Plan makes by way Policy Objective PHP20 (Protection of Existing Residential Amenity):

'It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.'

In response to this, it is noted that the *Development Plan* requires that:

'On all developments with a units per hectare net density greater than 50, the applicant must provide an assessment of how the density, scale, size and proposed building form does not represent over development of the site. The assessment must address how the transition from low density to a higher density scheme is achieved without it being overbearing, intrusive and without negatively impacting on the amenity value of existing dwellings particularly with regard to the proximity of the structures proposed. The assessment should demonstrate how the proposal respects the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring uses.'

The net density does not exceed 50 units per hectare and the proposed development has been carefully designed to ensure that these negative impacts will not occur.

Consequently, the proposed net density of 44.5 uph is deemed to be an acceptable and sustainable density at the subject site that will represent an appropriate and necessary uplift in this part of the Council area in accordance with planning policy at national, regional and local levels. Appropriate transitions are provided from the surrounding developments.

- *On all developments with height proposals greater than 4 storeys the applicant should provide a height compliance report indicating how the proposal conforms to the relevant Building Height Performance Based Criteria "At District/Neighbourhood/Street level" as set out in Table 5.1 in Appendix 5.*

Response: Please see below response to the criteria outlined Table 5.1 of Appendix 5:

The guidance with respect to height is defined in the *Building Height Strategy* set out in Appendix 5 of the *Development Plan*, which has been prepared in accordance with the principles espoused in *Building Heights Guidelines*. Whilst the Council recognises the County's historic patterns of low-rise development, it acknowledges the trend towards taller developments and the national policy and environmental factors that drive this in support of more sustainable and resilient urban development and compact growth.

The basis for additional height is driven by the principle of securing an increase in land-use intensities and residential densities, informed by planning policy at all levels that prioritises new development in existing urban areas. Therefore, with limited sites and site areas available, it is generally necessary, and indeed more sustainable, to 'build up, not out'.

Of relevance to the proposed development is Policy Objective BHS 2 (Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must

form part of the County Plan) of the *Development Plan* (Appendix 4) , which states the following:

'It is a policy objective to promote and support proposed heights as set out in any approved statutory Local Area Plans and as set out for certain areas in this County Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan Area and Dun Laoghaire Urban Framework Plan area).

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above on the basis of placemaking. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria.

Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.'

We note the *Kilternan LAP* was prepared well before the *Building Height Guidelines* were adopted. Therefore, to demonstrate the proposed development's compliance and accordance with the provisions of Table 5.1 in the *Development Plan's* Height Strategy, a series of responses to the criteria included in the Table is set out below:

At County Level	
Criterion	<i>"Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth."</i>
Response	<p>The proposed development will strongly support the attainment of the <i>NPF's</i> objectives. The current site is comprised of a derelict dwelling and outbuilding, which is an unsustainable use of lands in the centre of Kilternan village. However, the proposed development's 383 No. units will yield a significantly more appropriate and sustainable net density of 44.5 units per hectare. This increase in housing delivery and density are supportive of, and in alignment with, the following National Policy Objectives (NPOs) of the <i>NPF</i> (amongst others):</p> <p>NPO 2a – <i>"A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."</i></p> <p>NPO 3a – <i>"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."</i></p> <p>NPO 3b – <i>"Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints."</i></p> <p>NPO 5 – <i>"Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."</i></p>

	<p>NPO 35 – <i>"Increased residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."</i></p> <p>These NPOs seek to focus future development in existing urban environments, more efficiently using land resources and developing the critical mass required to provide public transport and local services and to sustain local businesses. Importantly, they also underpin the NPF's primary National Strategic Outcome (NSO), 'Compact Growth'.</p> <p>Further discussion in respect of the proposed development's alignment with the <i>NPF</i> is included in Section 6.2 of this Report.</p>
Criterion	<p><i>"Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport."</i></p>
Response	<p>The subject site is considered eminently suitable for development given the site's location in the centre of Kiltiernan Village with the Ballyogan Luas stop (green line) located c. 2.3 km – c. 2.7 km to the north-east (c. 26-31 minutes walking distance). Kiltiernan is also served by bus route Nos. 44, 63 and 118. These modes of transport provide direct connections to Dublin City Centre and institutions such as Dublin City University in Glasnevin, where residents can also easily transfer to other routes (red line) and modes (buses and trains) for onward connectivity. Although the site is not located within the stated distances of the Luas, Dart, Quality Bus Corridor or Bus Priority Route, it is considered that the site is well located proximate to modes of transport that provide direct connections throughout the city region, including the city centre, where residents can easily transfer to other routes and modes for onward connectivity.</p> <p>It is also noted that there are several proposed new bus routes for Kiltiernan within the Bus Connects scheme, such as Routes No. 88, L26, L13 and P13, which will all serve Kiltiernan Village and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area such as University College Dublin.</p> <p>The development itself proposes cycle parking that accords with the minimum standards, with permeable connections provided through the site to the surrounding area.</p>
Criterion	<p><i>"Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area."</i></p>

	<p>Response</p> <p>It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing and a Neighbourhood Centre on underutilised lands at the heart of Kiltiernan Village, which will contribute positively towards addressing the national housing crisis and will provide a range of services and facilities for the future residents of the scheme and the existing and future residents of Kiltiernan. The location of the higher building aligns with the general location of the permitted higher building in the adjoining Rockville development. The existing topography of the site has been fully considered in the overall public realm and built fabric arrangements, particularly in the eastern portion of the lands where the streets and houses have been configured parallel to the prevailing contours. This enables Part M access to the achieved and easy gradients along streets and footpaths to be maintained.</p> <p>The proposed development will create a strong and defined frontage along Enniskerry Road and Glenamuck Road, and the Village Green and Neighbourhood Centre accessed from Enniskerry Road will be a significant planning gain for the local area. This will also support the activation of the site, which is currently muted due to inactive frontage provided at present.</p> <p>The design of the development and its layout is such that the taller 5 No. storey elements are provided closer to the taller elements in the neighbouring Rockville development and fronting Glenamuck Road. This ensures that the development integrates with the surrounding area, respecting the pattern of development present thereat, but allowing for a gradual uplift in height in a select location, and an increase in density overall. The 5 No. storey element fronting Glenamuck Road will enclose the streetscape and will benefit legibility, appearance and character of the area and the 4 No. storey Neighbourhood Centre fronting the Village Green along Enniskerry Road will also contribute towards achieving this aim. Therefore, the subject scheme will result in the appropriate densification of a key infill site, providing much needed residential units which will contribute towards addressing the national housing crisis.</p> <p>The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space, which has been subject to detailed design by Ronan Mac Diarmada & Associates Landscape Architects & Consultants.</p> <p>A Daylight and Sunlight Analysis has been carried out by 3D Design Bureau, which demonstrates that no significant material impacts will occur to the surrounding properties.</p> <p>A Landscape Visual Impact Assessment has been carried out as part of the EIAR, which demonstrates that there will be no significant adverse visual impacts as a result of the proposed development. Any significant</p>
--	---

	<p>changes to the landscape of the site (i.e. some removal of trees and hedgerows and general construction activity) will be counterbalanced with the implementation of new planting and maintenance of important hedgerows. CGIs prepared by 3D Design Bureau are included, which demonstrate the high-quality design of the proposed scheme.</p>
Criterion	<p><i>"Protected Views and Prospects: Proposals should not adversely affect the skyline, or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view."</i></p>
Response	<p>It is not evident that the subject site is not proximate to the principal line of sight of any Protected Views or Prospects. The Landscape Visual Impact Assessment carried out as part of the EIAR demonstrates that no significant material impacts will occur to the surrounding properties.</p>
Criterion	<p><i>"Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan."</i></p>
Response	<p>In terms of roads capacity, Chapter 10 of the <i>Kiltiernan LAP</i> sets out a phasing strategy for the delivery of housing in Kiltiernan, which represents an interim proposal to accommodate development in advance of the delivery of the Glenamuck District Roads Scheme (GDRS), which includes the Glenamuck District Distributor Road (GDDR) and Glenamuck Link Distributor Road (GLDR). As noted previously, it is expected the GDRS will commence construction in Q3/Q4 2022 and it is estimated that the scheme will be completed in Q3/Q4 2024. The first phase of the proposed development is predicted to be fully constructed in September 2024 which lines up with the completion of the GDRS which will significant improve road capacity in the area.</p> <p>Generally, with respect to water services, the Confirmation of Feasibility issued by Irish Water confirmed the feasibility of connecting to their potable water and foul water networks. Further details of the proposals are contained in Roger Mullarkey & Associates Engineering Infrastructure Report.</p> <p>Atkins carried out a survey of the public transport capacity (bus and Luas) in the area which is included in Section 12 of the Traffic and Transport Assessment. It concluded that local buses and Luas services from Ballyogan Wood are 'operating with spare capacity that can accommodate additional loading associated with the development'.</p> <p>In relation to social and community infrastructure, the <i>Social Infrastructure Audit</i> and <i>Retail Study</i> prepared by KPMG Future Analytics is of relevance. The Report indicates the availability of adequate childcare and school places within the environs of the subject site to meet the demand generated by the development and ample provision of a broad range of community facilities and services. The</p>

	provision of a Neighbourhood Centre within the proposed development will also enhance the availability of services in the area.
At District/Neighbourhood/Street Level	
Criterion	<i>"Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape."</i>
Response	<p>The scheme has allowed and considered the future GLDR along the north-eastern boundary of the site and the upgrades to the Glenamuck Road to the north of the site (Part 8 development).</p> <p>The design layout includes a number of open spaces available to the public such as the village green, a woodland walk, pocket park and the Dingle Way, which will positively contribute to the natural environment. The scheme retains a large quantum of trees within established tree belts on site.</p> <p>In terms of the built environment, there are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Areas at the subject site. There are Protected Structures on neighbouring lands i.e. Rockville to the north-east and Our Lady of the Wayside Church to the south-west, which have been duly considered as part of the overall layout. There has already been housing provided surrounding the Rockville Protected Structure and the proposed development will comprise 3 No. storey duplexes and the Village Green opposite the Church, which will easily assimilate with this Protected Structure. Consequently, there are no protected or sensitive natural or built features at risk of negative impacts that may arise as a result of the realisation of up to 5 No. storeys at the subject site.</p> <p>The subject development predominately ranging in height from 2 to 5 No. storeys with the 5 No. storey apartment blocks fronting Glenamuck Road and the 4 No. storey Neighbourhood Centre fronting the Village Green (opening onto the Enniskerry Road), can be accommodated at the subject lands, whilst remaining respectful of the surrounding context. As noted above, the location of the 2 No. higher apartment blocks aligns with the general location of the permitted higher building in the adjoining Rockville development.</p> <p>The high-quality design of the proposed development will allow the development to be integrated into the surrounding area and as noted above, will positively enhance the legibility and streetscape of the surrounding area.</p> <p>The development will make a positive contribution to the neighbourhood and streetscape by: delivering various open spaces and permeable links; providing a Neighbourhood Centre which will serve the local community; activating the streetscape along Enniskerry Road and Glenamuck Road; enhancing the natural vegetation at the site by introducing a broad planting regimen; augmenting the critical mass required to sustain local service provision and businesses; and</p>

	<p>broadening the number and type of housing options available in the area.</p> <p>The design of the public and communal open space includes toddler's play area, children's play area, seating, lawns, planting and pedestrian paths, which will positively contribute to the natural environment.</p> <p>Given the context and size of the subject site, the site is suitable to accommodate building heights of 2 to 5 No. storeys, whilst remaining respectful of the surrounding context through the adoption of separation distances to boundaries and variation in height throughout the site. Therefore, it is our opinion that, through a high standard of design, siting and layout and large public open spaces and linkages through the site, the proposed development knits successfully with the surrounding context.</p>
Criterion	<i>"Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks. "</i>
Response	<p>The Design Statement prepared by MCORM Architects details the use of materials, the elevational treatment and modulated height arrangement which break up the massing of the proposed development.</p> <p>The development provides houses, duplexes, apartments and a Neighbourhood Centre which naturally provides a varied design and thus the scheme will not be monolithic.</p> <p>The Design Statement details the proposed materials and façade treatments which are also clear when viewing the Verified Views and CGIs prepared by 3D Design Bureau.</p> <p>It is clear that a significant effort has been made to provide a well-considered and interesting building form which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.</p>
Criterion	<i>"Proposal must show use of high quality, well considered materials. "</i>
Response	<p>As outlined in the Design Statement by MCORM, a mix of high-quality materials is proposed to deliver an attractive and hard-wearing development including:</p> <p><i>'...Depending upon the character areas within the site the materials vary. Between character areas there will be distinct differences between brick types and material choice, elevation treatment and building form in order to create variety and visual interest across the scheme.</i></p> <p><i>...The proposed buildings employ a controlled palette of materials with a mix of traditional and contemporary typologies. The primary materials for the development will be a mix of high-quality brick</i></p>

		<p><i>textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.</i></p> <p><i>...Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.</i></p> <p><i>...The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development.'</i></p> <p>Therefore, it is clear that high-quality materials have been well considered.</p>
	Criterion	"Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage. "
	Response	<p>The scheme includes c. 18,879 sq m high-quality public open space, including the Village Green fronting onto Enniskerry Road which will enhance the urban design context for the Village. In addition, some c. 2,934 sq m of communal open space will be provide for the residents of the apartments and duplexes.</p> <p>The scheme will provide active surveillance of the public and communal open spaces throughout the development. The new public spaces and linkages will significantly improve the public realm and will also enhance legibility and permeability in the area and thus represents a key planning gain for the wider neighbourhood. Importantly, the development will not be gated and will be open to the public.</p> <p>The Site Specific Flood Risk Assessment prepared by Roger Mullarkey & Associates and enclosed with this application concludes that:</p> <p><i>"As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.</i></p> <p><i>In accordance with the above noted Guidelines, as sequential staged approach was adopted in assessing the flood risk for the subject development.</i></p> <p><i>It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.</i></p>

	<p><i>It is concluded that a mixed residential and commercial development is appropriate on the subject lands.</i></p> <p><i>It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.</i></p> <p><i>Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding.'</i></p>
Criterion	<i>"Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved."</i>
Response	<p>The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area, particularly due to the attractive links provided through the site including the Dingle Way, and the provision of a Neighbourhood Centre, which will serve the local community. The Village Green fronting onto Enniskerry Road will animate the streetscape and will make a positive contribution to the legibility of the Village. The existing underutilised site will be replaced with a high-quality development, which will be a positive insertion to the area.</p> <p>The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space.</p>
Criterion	<i>"Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area. "</i>
Response	<p>The surrounding context of the subject site is generally characterised by a mix of low-density residential dwellings with a 4 No. storey apartment block abutting the north-eastern corner of the site. The scheme includes a Neighbourhood Centre, which will positively contribute to the mix of uses in the area. There is a large mix of dwelling types provided ranging from 1 No. bedroom apartments to 4 No. bedroom dwellings.</p> <p>The proposed scheme seeks to contribute towards reducing the deficit in Dublin's housing supply. The subject site is a key underutilised site in the village centre and provides a prime opportunity to provide a mixed-use development of suitable height, scale and mass that will result in the appropriate densification of the site.</p>
Criterion	<i>"Proposal should provide an appropriate level of enclosure of streets or spaces."</i>
Response	<p>The scheme will create visual interest in the streetscape along Enniskerry Road and Glenamuck Road and will positively contribute to placemaking through the linkages provided and the Neighbourhood Centre and Village Green fronting Enniskerry Road. The apartment blocks fronting Glenamuck Road will appropriately enclose the street. In addition the Neighbourhood Centre will appropriate enclose the</p>

	<p>new Village Green. Enniskerry Road will also be provided with a sense of enclosure by the proposed dwellings fronting the street and the Village Green opening onto Enniskerry Road will be a focal point for the community.</p> <p>This new frontage along the front of the site along Enniskerry Road will create a new urban edge with Sandyford Road, redefining the sense of place in a positive way. Furthermore, this new interface will enhance the creation of placemaking and perception of this area now being an accessible public environment (that is lacking presently due to the current undeveloped nature of the site).</p> <p>All open spaces within the site are overlooked by dwellings and or Neighbourhood Centre units.</p>
Criterion	<i>"Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces"</i>
Response	<p>A key element of the proposed development is the provision of a Neighbourhood Centre with associated Village Green in addition to the Dingle Way permeable link. Therefore, meaningful human contact is instilled within the essence of this development.</p> <p>The building types are varied throughout the site with open spaces provided in various locations. The benefit of this is that it will create a new urban grain and built rhythm across the site.</p> <p>This grain and the overall height of the development and their separation distances have been designed to be of a human scale and not overbearing; their height, positioning on the site and materiality mean that residents, visitors and passers-by can engage with them.</p> <p>The landscaped spaces have been carefully designed and planted to give them a sense of expanse, freedom, intimacy and enclosure in the seating areas and play spaces for example.</p> <p>Furthermore, the open spaces provide a variety of different features that will promote human interaction, engagement and socialising, including the seating areas, play spaces, greenway connectivity and woodland walk etc. This will be bolstered by the Neighbourhood Centre which will promote the creation of a community within the development.</p>
Criterion	<i>"Proposal must make a positive contribution to the character and identity of the neighbourhood."</i>
Response	<p>The proposed development has been designed to make a positive and lasting contributions to the character and identity of the neighbourhood by following means:</p> <ul style="list-style-type: none"> • Redefining the interface along Enniskerry Road and Glenamuck Road. This will create a new physical urban edge at

	<p>the site which is otherwise missing due to the lack of activation from these underutilised lands;</p> <ul style="list-style-type: none"> • The above approach to the design will also activate the streetscape in terms of both built-form (i.e. visually/aesthetically) and human presence and vibrancy, something that is lacking at this location; • A significant planting regimen is proposed that includes, amongst other features and plants, approximately 659 No. trees, which will create an attractive, lush and ecologically beneficial environment as they mature; and • The addition of 383 No. apartment units will broaden the total housing stock in the area, but also the housing types and sizes, thereby accommodating a broader range of residents (with different socio-economic backgrounds and incomes, life stages, household sizes, etc.) than would have otherwise lived here, which will support community building and integration. • The provision of a Neighbourhood Centre will provide a focal point for the community which will positive contribute to the character and identity of the neighbourhood.
Criterion	<i>"Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties."</i>
Response	<p>The <i>Kilternan LAP</i> prescribes heights of 2-4 No. storeys for the subject lands. The height of the scheme is predominately 2 to 3 No. storeys throughout the majority of the scheme and thus should not be considered challenging from a height and massing perspective. The scheme only provides an increase in height to 4 No. storeys in the Neighbourhood Centre fronting the Village Green and 5 No. storeys near the Glenamuck Road entrance. The location of the 5 No. storey apartment blocks align with the general location of the permitted higher building in the adjoining Rockville development.</p> <p>It is therefore considered that the scheme design strikes a balance between respecting the parameters of the <i>Kilternan LAP</i> and ensuring the development potential of a strategically positioned and underutilised plot is maximised, in the heart of Kilternan Village.</p>
At site/building scale	
Criterion	<i>"Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing. "</i>
Response	<p>The height of the scheme is 2 to 3 No. storeys throughout the majority of the scheme and thus should not be challenging from a daylight and sunlight perspective. The scheme only provides an increase in height to 4 No. storeys in the Neighbourhood Centre fronting the Village Green and 5 No. storeys near the Glenamuck Road entrance.</p> <p>The proposed development has been carefully designed and modulated ensuring there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites and minimal overshadowing impacts, and thus the scheme will</p>

	<p>have a limited impact on the amenity of surrounding properties. This is detailed in 3D Design Bureau's Daylight and Sunlight Assessment Report.</p> <p>The results of the enclosed Daylight and Sunlight Assessment demonstrate that the proposed scheme will not have an unacceptable or adverse impact on itself or on the surrounding properties with regard to daylight and sunlight. The proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight within the vast majority of the proposed units as the units perform well in terms of Average Daylight Factor (c. 98% of rooms compliant). The public and communal open spaces will all generally be provided well excellent levels of sunlight.</p>
Criterion	<p><i>"Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met."</i></p>
Response	<p>As noted above, the Daylight/Sunlight Assessment and the Landscape Visual Impact Assessment ultimately demonstrate that no material impacts will occur on neighbouring properties.</p> <p>The <i>Daylight and Sunlight Assessment Report</i> prepared by 3D Design Bureau includes a detailed assessment and review of the proposed development and the possible impacts of the proposed development on existing and potential neighbouring developments. The Board is directed to review this Report, included as part of this application pack.</p> <p>As part of a compensatory design solution for the rooms that do not meet the recommended minimum average daylight factor, the proposed development has incorporated a number of compensatory design measures including larger apartment sizes, larger room sizes, larger private amenity space and views to the public and/or communal open spaces. We have included a list of the rooms that fall short of the daylight provisions and demonstrated the compensatory design measures provided in the Material Contravention Statement.</p>
Criterion	<p><i>"Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing."</i></p>
Response	<p>As articulated in response to the preceding criteria, the proposed development has been carefully designed to ensure that it is not overbearing in its design. Its modulation of height and distributed massing results in a scheme that respects surrounding developments.</p> <p>In terms of overshadowing, the proposed development has little to no impact on neighbouring or residences.</p>

Criterion	<i>"Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure."</i>
Response	<p>There are no Protected Structures or Architectural Conservation Areas at the subject site. There are Protected Structures on neighbouring lands i.e. Rockville to the north-east and Our Lady of the Wayside Church to the south-west, which have been duly considered as part of the overall layout. There has already been housing provided surrounding the Rockville Protected Structure and the proposed development will comprise 3 No. storey duplexes and the Village Green opposite the Church, which will easily assimilate with this Protected Structure. Consequently, there are no protected or sensitive natural or built features at risk of negative impacts that may arise as a result of the realisation of up to 5 No. storeys at the subject site.</p> <p>Therefore, there is no risk of negative impacts on any Architectural Conservation Areas or Protected Structures.</p>
Criterion	<i>"Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development."</i>
Response	<p>Careful regard has been given to the energy costs and efficiency associated with the proposed development, both in terms of its construction and embodied carbon and in terms of its operation and occupation. The longevity of the structures' lives, the energy systems proposed, demolition and construction phases have been considered as part of the design process. Although the delivery of the development will result in the emission/production of carbon and other greenhouse gases, it is intended that these will be minimised wherever practicable, with the net gain associated with the provision of a high-quality, sustainable development in the centre of Kiltarnan Village considered to be significant. Further discussion in relation to these matters features in the <i>Energy Statement</i> and <i>Lifecycle and Management Report</i>.</p>
County Specific Criteria	
Criterion	<i>"Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor."</i>
Response	This criterion is not deemed applicable to the subject site or proposed development.

Criterion	<i>"Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive."</i>
Response	<p>At a maximum height of just 5 No. storeys in one portion of the site, the proposed development will not be obtrusive and of a scale that would negatively impact on the quality and amenity value of the County's "high quality mountain foothill landscape". Furthermore, it is sufficiently distant and screened by topography, existing and future development and vegetation from the amenity areas at Ticknock, Ballyedmonduff, Three Rock and Fairy Castle to the south and south-west.</p> <p>No concerns in relation to impacts on preserved/protected views were raised in the <i>Landscape Visual Impact Assessment</i> prepared by Enviroguide Consulting (Chapter 10 of the EIAR). The EIAR notes that the Kilternan Plain and Ballycorus Enclosures are located at the foothills of the Dublin mountains and given their terrain and number of routeways traversing this plain, they are likely to be subject to the most pressure for long-term development which would significantly alter the existing landscape. However the subject scheme will integrate into the surrounding environment with the majority of the scheme ranging from 2-3 No. storeys across the site with a 4 No. storey Neighbourhood Centre and the two 5 No. storey apartment blocks to the north of the scheme fronting Glenamuck Road and proximate to the existing apartment block in the neighbouring Rockville development.</p>
Criterion	<i>"Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage)."</i>
Response	This criterion is not deemed applicable.
Criterion	<i>"Specific assessments such as assessment of microclimatic impacts such as down draft."</i>
Response	<p>The scheme predominately provides 2 and 3 No. storey units with only two 5 No. storey apartment blocks to the north-east of the site and a 4 No. storey Neighbourhood Centre in the centre/south-west of the site, and thus a Wind Assessment is not required. Generally these assessments are required when buildings are at least 30 No. metres in height. The maximum height of the Neighbourhood Centre is c. 14.7 metres (with the telecommunications infrastructure extending to c. 16.286 metres). The maximum height of the apartment blocks is c. 15.975 No. metres, which is well below 30 No. metres.</p> <p>In addition, an <i>Acoustic Design Statement</i> was prepared by RSK Ireland Limited. This Report considered the potential impact of the existing and future noise sources on future residents of the proposed dwellings, along with an assessment of the potential operational phase noise impact of the proposed development to nearby existing receptors.</p>

		<p>The <i>Acoustic Design Statement</i> concludes the following:</p> <p><i>'The aim of this study is to assess the potential impacts to future residents and nearby receptors and to provide recommendations, where necessary, to the risk of nuisance arising from operational phase noise emissions.</i></p> <p><i>Baseline monitoring has found pre-existing noise levels are typical of a suburban location in the vicinity of a busy road network. Future noise emissions from the Glenamuck District Roads Scheme (GDRS) have been taken into account and resultant expectant future noise levels on site established via modelling.</i></p> <p><i>This report also considers the potential inward impact of road traffic on the proposed development. Assessment methodologies use guidance from The Professional Guidance on Planning & Noise (ProPG), May 2017. The two primary stages of the ProPG assessment are the "Stage 1" initial noise risk assessment of the proposed site and "Stage 2" detailed appraisal of the proposed development and preparation of an Acoustic Design Statement.</i></p> <p><i>The site noise survey has also been used to assess the sites noise risk categories, as per the ProPG "Stage 1" assessment. The ProPG noise risk categories, for façades most exposed to road traffic, are Negligible to Medium for daytime and Negligible to Medium/High for night-time periods.</i></p> <p><i>Recommendation to mitigate noise emissions, as specified in the "Stage 2" Acoustic Design Statement, include the following:</i></p> <ul style="list-style-type: none"> <i>• Provision of glazing with minimum sound insulation properties as outlined in this document.</i> <i>• Provision of acoustic attenuation to ventilation systems for dwellings as outlined in this document.</i> <p><i>In the developments operational phase, criteria have also been set for new any new building services plant (i.e. such as may be required to service the retail/commercial elements of the proposed neighbourhood centre), to both existing and future residents, in accordance with the methodologies outlined in BS 4142:2014+A1:2019. It has been concluded that the likely noise impact of the developments in its operational phase is not significant.</i></p> <p><i>In summary, it is considered that the site is suitable for residential development subject to the provision of the noise control recommendations as outlined in this report.'</i></p>
--	--	---

Criterion	<i>"Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas."</i>
Response	<p>The potential for collision risk is low considering the building location, design and materials used.</p> <p>No specific issue in relation to this criterion was raised by Scott Cawley Limited.</p>
Criterion	<i>"Assessment that the proposals allow for the retention of telecommunications channels, such as microwave links."</i>
Response	<p>The <i>Telecommunications Report</i> enclosed and prepared by Independent Site Management Limited notes the following:</p> <p><i>'To provide an adequate allowance for the retention of the 2No. identified Microwave links that will be impacted by the Development, the Applicant is seeking planning permission to install 3No. support poles, affixed to the lift shaft overrun on the Development's neighbourhood centre block B, rising 3metres above roof level.</i></p> <p><i>These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each (together with associated telecommunications equipment), which provides an adequate solution for the Applicant to mitigate the impact the Development will have on the existing Microwave links emanating from the existing mast currently within the development site boundary, as well as providing some capacity for future links that may or may not be required.</i></p> <p><i>To provide an adequate allowance for the retention of the 6No. identified Radio Frequency links that will be impacted by the Development, the Applicant is seeking planning permission to install 9No. support poles, affixed to ballast mounts on neighbourhood centre block B rising 2.5 metres above parapet level.</i></p> <p><i>These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each (together with associated telecommunications equipment), which creates the ability for the Applicant to mitigate the impact the Development will have on the existing Radio Frequency links emanating from the mast within the development site, as well as providing some capacity for future links that may or may not be required.</i></p> <p><i>To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds'.</i></p>

Criterion	<i>"An assessment that the proposal maintains safe air navigation."</i>
Response	The subject site is located c. 20 km from Dublin Airport and is not in proximity to any aerodromes, and the proposed development is not of sufficient height to require a detailed Aviation Impact Assessment.
Criterion	<i>"Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate."</i>
Response	An Appropriate Assessment Screening Report and Environmental Impact Assessment Report have been prepared and submitted with this planning application.
Criterion	<i>"Additional criteria for larger redevelopment sites with taller buildings"</i>
Response	This criterion is not deemed applicable.
Criterion	<ul style="list-style-type: none"> <i>"Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development."</i>
Response	<p>The subject scheme seeks to limit urban sprawl by making best use of an existing infill site in the centre of the village. The proposed scheme will make a positive contribution to the surrounding area by developing a key underutilised site and providing a high-quality residential development (which will contribute positively towards addressing the national housing crisis), which will also provide linkages through the site to the neighbouring Rockville development and the future GLDR. The newly proposed Neighbourhood Centre fronting the new Village Green will make a positive contribution to place making.</p> <p>The scheme will create visual interest in the streetscape along Enniskerry Road and Glenamuck Road and will positively contribute to placemaking through the linkages provided and the Neighbourhood Centre and Village Green fronting Enniskerry Road.</p> <p>The subject scheme includes the provision of 18,879 sq m of public open space and 2,934 sq m of communal open space, which has been subject to detailed design by Ronan MacDiarmada & Associates Landscape Architects & Consultants, and the scheme will provide focal point for the Village. The open spaces will enhance the quality of living of future occupants and the wider public and thus will positively contribute to place-making. The delivery of the scheme, which varies in height from 2 to 5 No. storeys is considered as being of notable benefit to the community in terms of permeability and accessibility.</p> <p>The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an infill site in the centre of the village, providing varied and visually interesting façades for the surrounding streetscape, which will positively contribute to place-making.</p>

Criterion	<i>"For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met."</i>
Response	<p>An Bord Pleanála is redirected to the response in relation to daylight and sunlight above. The results of the enclosed Daylight and Sunlight Assessment demonstrate that the proposed scheme will not have an unacceptable or adverse impact on itself or on the surrounding properties with regard to daylight and sunlight. The proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight within the vast majority of the proposed units as the units perform well in terms of Average Daylight Factor (c. 98% of rooms compliant). The public and communal open spaces will all generally be provided well excellent levels of sunlight.</p> <p>In relation to relevant standards, we note that updated guidance in relation to these Guidelines were adopted on 8th June 2022, which was published close to the lodgement date of the subject Strategic Housing Development Planning Application. Therefore, the 2022 update was published after the proposed development had been fully designed and after the assessment based on the previous guidance was complete.</p> <p><i>'At the time of writing this report (10/06/22), the BRE Guidelines have released the third edition. However, as all assessment was completed prior to the publication of the 3rd edition (08/06/22), the 2nd edition of the BRE Guidelines has been used for all recommendations within this report.</i></p> <p><i>It should be noted that the European Standard (EN 17037:2018 Daylight in Buildings) had been published prior to the publication of Sustainable Urban Housing: Design Standards for New Apartments in December 2020. Furthermore, British authorities have published and adopted a national annex to the European standards, BS EN 17037. Neither EN 17037 nor BS EN 17037 are referenced in the 2020 apartment guidelines and to the best of our knowledge are not referenced in any planning guidance document issued by Irish planning authorities. Additionally, the relevant documents for assessing this application at the time of preparing the planning application were the BRE Guidelines.</i></p> <p><i>Until official guidance or instruction is published by a relevant Irish planning authority on this matter, 3DDB will continue to reference the BRE Guidelines in our daylight and sunlight assessments and planning authorities should also continue to assess applications based on the relevant guidelines at the time of preparing an application. As such, ADF will be the primary assessment to determine daylight within proposed habitable spaces with circa compliance rates and analysis of results focused on the results of the ADF study, whilst the assessments that have been carried out</i></p>

		<p><i>regarding the criteria set out in EN 17037 and BS EN 17037 should be considered as supplementary studies.</i></p> <p><i>Neither the British Standard, European Standard, British Annex to the European Standard nor the BRE Guide set out rigid standards or limits. They are all considered advisory documents. The BRE Guide is preceded by the following very clear statement as to how the design advice contained therein should be used:</i></p> <p><i>"The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design."</i></p> <p><i>That the recommendations of the BRE Guide are not suitable for rigid application to all developments in all contexts, is of particular importance in the context of national and local policies for the consolidation and densification of urban areas or when assessing applications for highly constrained sites (e.g. lands in close proximity or immediately to the south of residential lands).'</i></p>
--	--	---

Table 3.1: Responses to criteria in Table 5.1 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028's Building Height Strategy*

Source: Responses by Thornton O'Connor Town Planning, 2022

- *On sites abutting low density residential development (less than 35 units per hectare) and where the proposed development is four storeys or more, an obvious buffer must exist from the rear garden boundary lines of existing private dwellings.*

Response: The location of the two 5 No. storey apartments blocks to the north-east of the site has been sensitively positioned having regard to the neighbouring apartment block in Rockville. There will be a buffer of trees along the site boundary in this location.

- *Where a proposal involves building heights of four storeys or more, a step back design should be considered so as to respect the existing built heights.*

Response: A step back approach has been adopted for the proposed 5 No. storey apartment blocks, which sets back at the top floor level and thus reading as part 4 to part 5 No. storeys.

Policy Objective PHP25: 'Housing for All – A new Housing Plan for Ireland, 2022'

It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in 'Housing for All – A new Housing Plan for Ireland, 2021'.

As set out in Section 4.4, the proposed development will deliver 383 No. much-needed apartments in a sustainable location which will contribute towards the delivery of housing in the Dún Laoghaire-Rathdown area. The scheme will provide housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 39 No. Part V units (10%). The scheme will provide 383 No. residential units in lieu of the existing dwelling and outbuildings (to be demolished), which are not considered to be of architectural merit and currently do not represent sustainable use of accessible and infill urban lands. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

Policy Objective PHP26: Implementation of the Housing Strategy

It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028.

The scheme will provide 27 No. 1 bedroom units, 128 No. 2 bedroom units, 171 No. 3 bedroom units and 57 No. 4 bedroom units. Therefore, it is clear that a variety of dwelling sizes are provided, which will serve a wide cohort of persons and will facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028 in this built-up area.

Policy Objective PHP27: Housing Mix

It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.

The scheme will provide 27 No. 1 bedroom units (19 No. apartments and 8 No. duplexes), 128 No. 2 bedroom units (78 No. apartments and 50 No. duplexes), 171 No. 3 bedroom units (108 No. houses, 3 No. apartments and 60 No. duplexes) and 57 No. 4 bedroom units (57 No. houses). Therefore, it is clear that a variety of unit types and sizes are provided, which will serve a wide cohort of persons.

Policy Objective PHP30: Housing for All

It is a Policy Objective to:

- *Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.*
- *Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*
- *Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community.*

The proposed development has been designed to be universally accessible as detailed in the Universal Access Statement prepared by MCORM. The provision of a mix of unit sizes including some smaller 1 and 2 No. bedroom units, will provide the opportunity for downsizing within the existing community.

Policy Objective PHP31: Provision of Social Housing

It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.

Some 39 No. Part V units are provided in accordance with Part V of the *Planning and Development Act 2000 (as amended)*, which requires 10% social and affordable housing for the subject site. We note that the site was purchased on 22nd December 2020 and thus the 10% requirement applies to the subject site as per the Affordable Housing Act 2021.

Policy Objective PHP35: Healthy Placemaking

It is a Policy Objective to:

- *Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- *Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013).*
- *Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.*

A full response to the relevant Policy Objectives of the *NPF* are discussed in Section 6.2 of this Report and all relevant Policy Objectives of the *RSES* is provided in Section 7.2 of this Report. In addition, a detailed response to the relevant criteria of the 'Urban Design Manual – A Best Practice Guide' (2009) in Section 6.8, and in the 'Design Manual for Urban Roads and Streets' (2013) [now 2019] is provided in Section 6.10 of this Report. The proposed development has fully considered its context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design, as discussed throughout this Report, particularly in Section 6.8.

Policy Objective PHP36: Inclusive Design & Universal Access

It is a Policy Objective 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 all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.

The proposed development has been designed to be universally accessible as detailed in the Universal Access Statement prepared by MCORM.

Policy Objective PHP37: Public Realm Design

It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.

The scheme will enhance this area and will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm. The

development will provide new pedestrian connections especially due to the provision of the Dingle Way which will link Enniskerry Road with the future GLDR. This will improve permeability for all pedestrians. A number of access points have been provided for the residents and public to access the residential units and the Neighbourhood Centre, which will open up the site and provide a more active streetscape along Enniskerry Road and Glenamuck Road, which will improve the public realm.

Policy Objective PHP40: Shared Space Layouts

It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).

The development has been designed in accordance with DMURS, as demonstrated in the enclosed Traffic and Transport Assessment by Atkins. There will be limited vehicular activity within the subject scheme which provides a public realm that prioritises ease of movement for pedestrians and bikes.

Policy Objective PHP41: Safer Living Environment

It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.

The scheme will provide a safe environment for all, particularly as the scheme prioritises pedestrian and cyclist movement and given that the scheme has been designed to be accessible for all (Universal Access Statement prepared by MCORM).

Policy Objective PHP44: Design Statements

It is a Policy Objective that, 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) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.

A Design Statement prepared by MCORM accompanies this planning application which has been prepared with reference to the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009). In addition, a detailed response to the relevant criteria of the 'Urban Design Manual – A Best Practice Guide' (2009) is provided in Section 6.8 of this Planning Report & Statement of Consistency. In terms of adaptability, the ground floor of the Neighbourhood Centre is provided with floor to ceiling heights of 3.4 metres at a minimum which are capable of internal modification where deemed necessary. The apartment blocks are provided with a minimum height of 2.9 metres. The duplexes are provided with a minimum ground floor to ceiling height of 2.7 metres. All upper levels have been designed with a floor to ceiling height of at least 2.4 metres which is considered good practice. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications.

Policy Objective RET7: Neighbourhood Centres

It is a Policy Objective of the Council to support the development of the Neighbourhood Centres as the focal point of the communities and neighbourhoods they serve, by way of the provision of an appropriate mix, range and type of uses – including retail and retail services – in areas zoned objective 'NC' subject to the protection of the residential amenities of the surrounding area.

The proposed Neighbourhood Centre will accord with this Policy Objective as it will represent a focal point for the community. As set out Section 2.2 of the *Response to ABP Opinion* enclosed, the mix, range and type of units proposed is appropriate and will adequately serve the existing and proposed residential developments in the area.

Furthermore, 'The RSGDA⁵ explains that Neighbourhood Centres usually contain convenience retail ranging in size from 1,000-2,500 sq. m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population.'

The *Social Infrastructure Audit and Retail Services Assessment* prepared by KPMG Future Analytics has considered this statement that Neighbourhood Centres usually provide convenience retail ranging in size from 1,000-2,500 sq. m. The scheme provides less than 1,000 sq m convenience retail however the report by KPMG Future Analytics notes that 'the offering is considered to be appropriate for the subject site given the general patterns of vacancy of retail units within nearby areas of Stepside and Belarmine to the north and the existing provision of facilities'.

The Report notes:

*'The subject proposal includes the provision of a neighbourhood centre (c.2,512 sqm) comprising retail space (c.431 sqm convenience and 857 sqm retail), office space (c.317 sqm), a medical facility (c.147 sqm), a community facility (c.321 sqm) and a creche (c.439 sqm). **The size provided for the neighbourhood centre (which has a combined retail floor area of 1,288 sq m, an increase of 564 sq m since the tripartite meeting during Stage 2) in conjunction with the existing and pipeline retail facilities is sufficient to cater for additional demand generated by the proposed scheme, which has further been detailed below. Therefore, the proposed development would be considered to be well within the requirements of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (and the Retail Strategy for Greater Dublin Area)⁶.** [Our Emphasis]*

⁵ Retail Strategy for the Greater Dublin Area

⁶ Section 7.5.4 of the *Development Plan* notes the following: 'The RSGDA [Retail Strategy for the Greater Dublin Area] explains that Neighbourhood Centres usually contain convenience retail ranging in size from 1,000-2,500 sq. m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population.'

TRANSPORTATION

Policy Objective T1: Integration of Land Use and Transport Policies

It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high quality public transport systems. (Consistent with NSO 1, NPO 26 of the NPF, 64, RPO 4.40, 5.3, 8.1 and Guiding Principles on Integration of Land Use and Transport of the RSES)

The proposal actively encourages the use of sustainable modes of transport especially due to the site's location within the Village Centre and a new Neighbourhood Centre will be provided which will afford residents of the scheme and the local community the opportunity to walk or cycle to the Neighbourhood Centre facilities. In addition, the scheme promotes sustainable modes of transport through the provision of permeable links such as the Dingle Way and linkages to the surrounding developments etc. In addition, the scheme proposes 73 No. electric vehicle spaces, 1 No. car share space and 536 No. bicycle parking spaces.

Policy Objective T11: Walking and Cycling

It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)

The proposed development will improve the public realm in the area and will provide a new pedestrian and cyclist connection to the surrounding developments/future GLDR, which will improve permeability for all pedestrians.

Policy Objective T17: Travel Plans

It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)

A Mobility Management Plan has been prepared by Atkins.

Policy Objective T18: Car Sharing Schemes

It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.

Some 1 No. car share space is proposed as part of the subject development.

Policy Objective T19: Carparking Standards

It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.

The relevant parking standards of Section 12.4.5 are discussed earlier in this Statement of Consistency. The development promotes sustainable modes of transport, especially due to

the site's location in the Village Centre. The scheme also promotes walking and cycling from the site and 536 No. bicycle parking spaces are proposed.

Policy Objective T22: Taxi/Minibus/ Hackney Transport

It is a Policy Objective to facilitate the provision of taxi/minibus/hackney transport as a feeder service to major public transport corridors and to encourage the provision of taxi ranks at DART Stations, Luas stops, key bus stations and at other appropriate locations - including within larger residential, commercial and/or mixed-use developments.

The scheme includes 4 No. set down spaces which can facilitate taxi drop off for the development.

Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits

It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.

The Traffic and Transport Assessment and Road Safety Audit (within the Quality Audit document) has been prepared in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014).

Policy Objective T27: Traffic Noise

It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.

An Acoustic Design Statement has been prepared by RSK Ireland Limited which concludes that:

'It is considered that the site is suitable for residential development subject to the provision of the noise control recommendations as outlined in this report'.

The noise control recommendations require the provision of glazing with minimum sound insulation properties and the provision of acoustic attenuated ventilation with minimum sound insulation properties as outlined in the Report. Therefore, it is clear that the traffic noise levels in the area have been considered as part of this planning application.

Policy Objective T31: Accessibility

It is a Policy Objective to support suitable access for people with disabilities, including improvements to transport, streets and public spaces. Accessibility primarily concerns people with reduced mobility, persons with disabilities, older persons and children. (Consistent with RPO 9.1 and 9.10 of the RSES)

The Universal Access Statement prepared by MCORM outlines that the Design Team is firmly committed to achieving universal access.

GREEN INFRASTRUCTURE AND BIODIVERSITY

Policy Objective GIB2: Landscape Character Areas

It is a Policy Objective to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County's landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the 'Draft Guidelines for Landscape and Landscape Assessment' (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with 'A National Landscape Strategy for Ireland – 2015-2025'. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage, and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.

The proposed development does not affect any Landscape Character Areas namely the Kiltiernan Plain, Ballycorus and Carrickmines.

A closer perspective of the proposed development site reveals that the maintenance of the central hedgerow on the site, allowing a link to Land Parcel 23B, provided on the *Kiltiernan LAP*, which makes the transition to the High Amenity Area, even further to the east (Land Parcel 24B).

Policy Objective GIB5: Historic Landscape Character Areas

In assessing development proposals and in the preparation of plans, it is a Policy Objective to have regard to the recommendations and findings of the Historic Landscape Character Assessments (HLCA), already undertaken for a number of the urban-rural fringe areas of the County most likely to come under development pressure.

The proposed development does not affect any Historic Landscape Character areas.

Policy Objective GIB6: Views and Prospects

It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.

There are no Preserved/Protected Views/Protected Areas within the study area and the proposed development does not affect any protected view identified in the County.

The protected views *Carrickgollogan from the Enniskerry Road* (south of Kiltiernan Village) and *Three Rock Mountain and Two Rock Mountain from the Enniskerry Road* (Sandyford -Kiltiernan area) and *Sandyford Village* are not affected by the proposed development.

Policy Objective GIB20: Biodiversity Plan

It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2026.

The scheme will provide a planting scheme that includes a range of pollinator-friendly species to encourage biodiversity. In addition, as set out in the *Landscape Rationale* by Ronan

MacDiarmada & Associates Landscape Architects & Consultants, some 659 No. tree species have been proposed and will improve biodiversity whilst also providing aesthetic and/or functional characteristics. A total of 659 No. new trees are proposed for this scheme, species.

Policy Objective GIB21: Designated Sites

It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.

The Appropriate Assessment Screening Report prepare by Scott Cawley Limited concluded:

'that the possibility of any significant effects on any European sites, in the absence of mitigation, whether arising from the proposed development alone or in combination with other plans and projects, can be excluded... In reaching this conclusion, the nature of the works and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.'

Policy Objective GIB28: Invasive Species

It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

Invasive species are dealt with in the Biodiversity EIAR Chapter prepared by Scott Cawley.

Policy Objective GIB29: Nature Based Solutions

It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.

Included as part of the landscape plan are nature-based solutions such as natural and formal tree and shrub planting and proposed pollinator species.

OPEN SPACE, PARKS AND RECREATION

Policy Objective OSR4: Public Open Space Standards

It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A

Best Practice Guide’, and the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2020).

The scheme provides high-quality public and communal open spaces. Please see Section 6.8 for a response to the ‘Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities’, (2009) and the accompanying ‘Urban Design Manual - A Best Practice Guide’, and please see Section 6.6 for a response to the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2020).

Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking

It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilitates people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16).

The landscape proposal incorporates a network of well-connected external spaces designed to encourage active play, exercise and social interaction, as well as passive relaxation.

Policy Objective OSR7: Trees, Woodland and Forestry

It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach.

The scheme retains as many trees as possible and a woodland walk is proposed for example, which will have environmental, climatic and educational benefits

Policy Objective OSR13: Play Facilities and Nature Based Play

It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.

The proposed play strategy for this scheme provides for structured and natural play spaces throughout the development. The structured play space includes a seesaw, stepping logs, balance beams and an embankment slide and the natural/incidental play space includes grass mounding, timber log, stepping logs and natural stepping stones.

ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK

Policy Objective EI3: Wastewater Treatment Systems

It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.

It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution.

It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.

The proposed development is supplied by a public foul sewerage network.

Policy Objective EI4: Water Drainage Systems

It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)

The proposed development has a completely separated drainage system provided.

Policy Objective EI6: Sustainable Drainage Systems

It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).

The proposed development provides a significant amount of SuDS elements including green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices.

Policy Objective EI9: Drainage Impact Assessment

It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council’s Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).

In accordance with the requirements of the Stormwater Management Policy, a Stormwater Audit has been carried out by Punch Consulting Engineers for the proposed development and is included in Appendix 12.6 of the Engineering Infrastructure Report & Stormwater impact Assessment by Roger Mullarkey & Associates Consulting Engineers.

Policy Objective EI10: Storm Overflows of Sewage to Watercourses

It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region’s receiving waters are met in a cost effective manner.

The proposed development has a completely separated drainage system provided and no overflow of sewage is practically feasible.

Policy Objective EI11: Resource Management

It is a Policy Objective to implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources. Underpinning this objective is the requirement to conform to the European Union and National Waste Management Hierarchy of the most favoured options for waste as illustrated below subject to economic and technical feasibility and Environmental Assessment. (Consistent with RPO 10.25 of the RSES)

The Eastern-Midlands Region Waste Management Plan 2015-2021 has informed the preparation of the Construction and Demolition Waste Management Plan and Outline Operational Waste Management Plan prepared by Enviroguide Consulting and included separately.

Policy Objective E112: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling

It is a Policy Objective:

- *To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- *To aim to provide a supporting waste management infrastructure in the County for the processing and recovery of waste streams such as mixed municipal waste in accordance with the proximity principle.*
- *To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved.*
- *To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.*
- *To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.*
- *To require the inclusion of such centres in all large retail developments to maximise access by the public.*
- *To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities (an excerpt of which is contained in Appendix 6).*

The waste strategy for the proposed development has been designed with due consideration of Policy Objective E112 where relevant. The Outline Operational Waste Management Plan concludes the following:

'By implementing design and actions outlined in this OWMP, a high level of recycling, reuse and recovery will be achieved at the development in line with European targets. Recyclables and organic waste will be segregated at source to reduce the quantity of residual waste materials requiring off-site recovery or disposal.

The source segregation of waste types as detailed in this report will help to achieve the targets set out in the EMR Waste Management Plan 2015 – 2021'.

Policy Objective EI14: Air and Noise Pollution

It is a Policy Objective:

- *To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES)*
- *To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'.*

The Acoustic Design Statement prepared by RSK Ireland Limited has given due consideration to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023' and other documents as detailed in the report. In addition, the planning application has given due consideration to best practice guidance in relation to air quality and noise pollution, as detailed throughout in the EIAR.

Policy Objective EI15: Light Pollution

It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.

The lighting configuration has been carefully selected to achieve recommended illuminance levels whilst minimising light spill and avoiding over lighting. This is achieved by a combination of optimised column height, luminaire Wattage, optical setting and column location for each road configuration. All luminaires proposed have high performance street lighting specific optics designed to get the light onto the target area thus minimising spill light. All luminaires proposed have a 0 degree tilt. The Upward Light Ratio of all proposed column mounted luminaires is 0%. All luminaires are to be warm white colour temperature with peak wavelength of above 550nm. All column mounted luminaires are to be fitted with photocells which automatically switch luminaires on during night time and off during daytime. Additionally, all column mounted luminaires are to automatically dim by 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.

Policy Objective EI19: Overhead Cables

It is a Policy Objective to seek the undergrounding of all electricity, telephone and television cables wherever possible, in the interests of visual amenity and public health.

It is the design intent to install all electricity, telephone and television cabling below ground via a ducting system for this development. When liaising with the ESB it was deemed unviable to divert the existing 110kV overhead line below ground due to cost and timelines.

Policy Objective El20: Telecommunications Infrastructure

It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity, fibre optic connectivity and other technologies, within the County.

The Telecommunications Report prepared by Independent Site Management Limited states the following:

'To provide an adequate allowance for the retention of the 2No. identified Microwave links that will be impacted by the Development, the Applicant is seeking planning permission to install 3No. support poles, affixed to the lift shaft overrun on the Development's neighbourhood centre block B, rising 3metres above roof level.

These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each (together with associated telecommunications equipment), which provides an adequate solution for the Applicant to mitigate the impact the Development will have on the existing Microwave links emanating from the existing mast currently within the development site boundary, as well as providing some capacity for future links that may or may not be required.

To provide an adequate allowance for the retention of the 6No. identified Radio Frequency links that will be impacted by the Development, the Applicant is seeking planning permission to install 9No. support poles, affixed to ballast mounts on neighbourhood centre block B rising 2.5 metres above parapet level.

These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each (together with associated telecommunications equipment), which creates the ability for the Applicant to mitigate the impact the Development will have on the existing Radio Frequency links emanating from the mast within the development site, as well as providing some capacity for future links that may or may not be required.

To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds.'

Policy Objective El22: Flood Risk Management

It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (20010/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on 'The Planning System and Flood Risk Management' (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives, and all measures to mitigate identified flood risk, including those recommended under part 3 (flood risk considerations) of the Justification Tests, in the Strategic Flood Risk Assessment set out in Appendix 15 of this Plan.

A Site Specific Flood Risk Assessment (SSFRA) is submitted with the application in accordance with the Planning System and Flood Risk Management Guidelines. The SSFRA states:

'As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.'

8.2 Kilternan-Glenamuck Local Area Plan 2013-2018 (Extended to September 2023)

8.2.1 Introduction

The subject lands are located within the *Kilternan-Glenamuck Local Area Plan 2013-2019* [extended to September 2023] ("*Kilternan LAP*"). The *Kilternan LAP* proposes the development of a '*Neighbourhood Centre*', retail, office and community facilities as well as medium residential development on the subject lands.

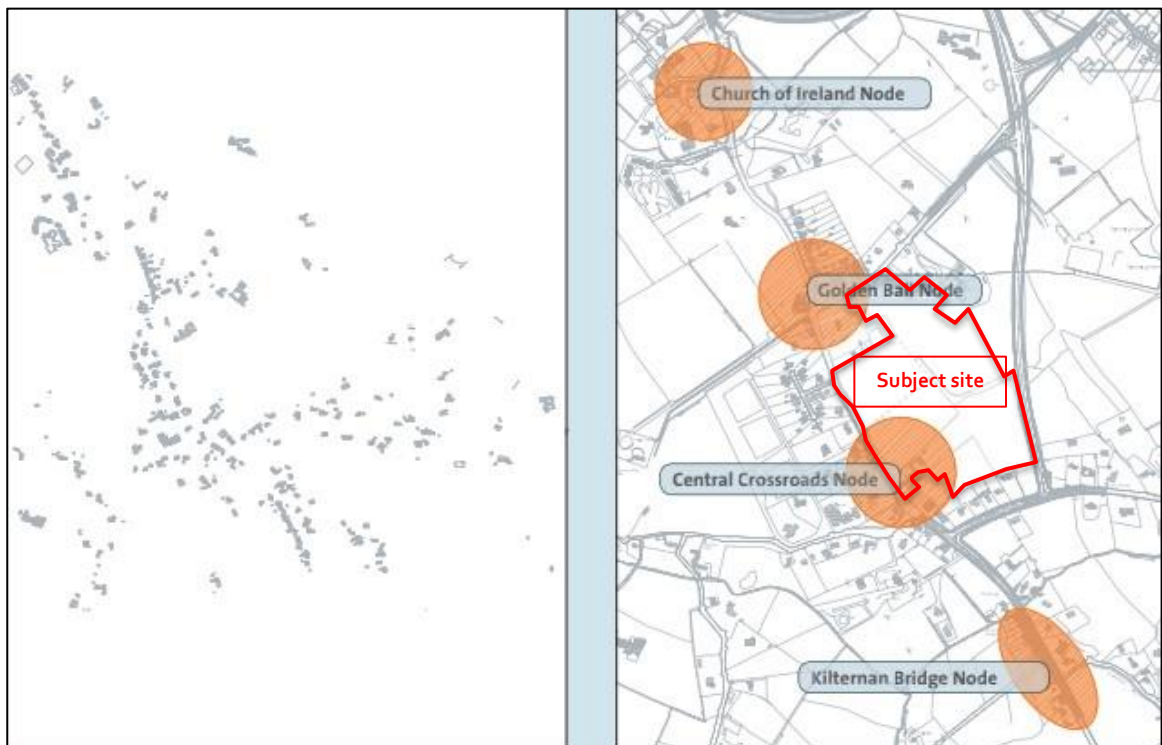


Figure 8.9: The figure above shows the dispersed settlement pattern (left) with clusters of development 'nodes' at certain points along the Enniskerry Road (right). Subject Site Indicatively Outlined in Red.

(Source: *Kilternan LAP*, annotated by Thornton O'Connor Town Planning, 2022)

The *Kilternan LAP* describes in detail the contextual setting of Kilternan, in particular its position at the foothills of the Dublin Mountains and the significance of the Enniskerry Road as a strategic route leading southwards from the city.

It notes:

'That while development has to some extent clustered around the Glenamuck / Enniskerry Roads and Enniskerry / Ballycorus / Ballybetagh Road junctions, the overall development pattern is very linear and fragmented and as such, the LAP area lacks a strong physical identity or indeed, focal point.'

The Historic Landscape Character Assessment carried out by DIT (2004) also describes this settlement pattern identifying clusters of development 'nodes' at certain points along the road. The nodes that it identifies, which are of significance to the DLR *Neighbourhood Framework Plan* (Appendix to the *Kiltiernan LAP*), include the Church of Ireland Node and the Golden Ball Node. The subject site for the proposed mixed use development (including a new Neighbourhood Centre) is located in between both significant nodes and will become the focal point for the Village reference as currently missing the *Kiltiernan LAP*.

8.2.2 Phasing of Development

Chapter 10 of the *Kiltiernan LAP* sets out a phasing strategy for the delivery of housing in Kiltiernan, which represents an interim proposal to accommodate development in advance of the delivery of the Glenamuck District Roads Scheme (GDRS), which includes the Glenamuck District Distributor Road (GDDR) and Glenamuck Link Distributor Road (GLDR). The interim proposal set out by the *Kiltiernan LAP* is that 700 No. dwellings could be accommodated on the existing road network (noted as Phase 1), which is broken down into the following sub-phases:

Phase 1 (a) to comprise c. 350 dwelling units:

A. GLENAMUCK ROAD UPPER/NORTH PORTION (c. 200 dwelling units)

This area encompasses the lands designated as 'medium-higher density residential' at the northern section of Glenamuck Road (referred to as Phase 1 (a)(A) where relevant in this document).

B. NODE AT JUNCTION OF ENNISKERRY AND GLENAMUCK ROADS (c. 150 dwelling units)

This area includes the lands designated as 'medium density residential' to the east of the Enniskerry Road. Any proposed developments must include the improvement of Glenamuck Road (referred to as Phase 1 (a)(B) where relevant in this document).

Phase 1 (b) to comprise c. 350 dwelling units:

C. CONCENTRATED AT VILLAGE CORE / ALONG ENNISKERRY ROAD

These lands include the lands zoned as 'Neighbourhood Centre' and 'Residential' along the Enniskerry Road. Development is dependent on the delivery of the Traffic Calming Scheme and must include the improvement of the Enniskerry Road through the 'Village Core' (referred to as Phase 1 (b)(C) where relevant in this document).

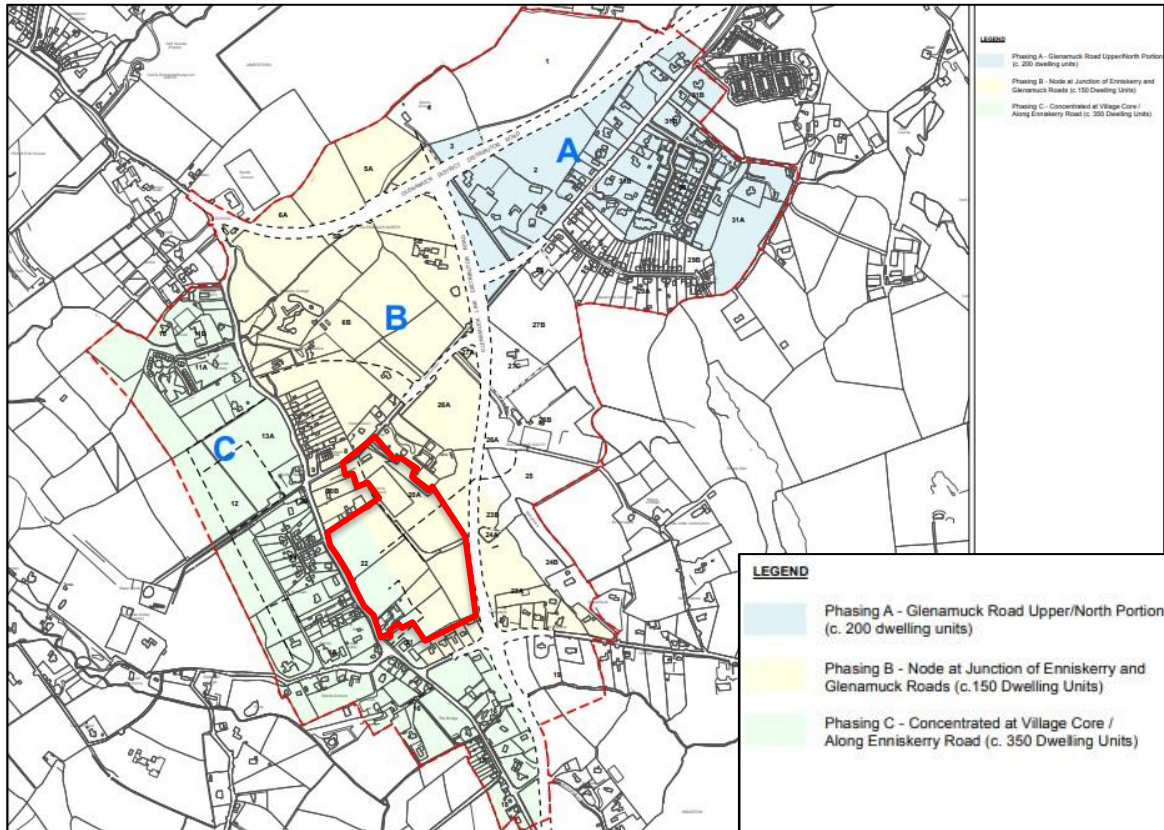


Figure 8.10: *Kiltiernan LAP* Phasing Map with Developable Site Outlined Indicatively in Red

(Source: *Kiltiernan LAP*, annotated by Thornton O'Connor Town Planning, 2022)

We note that the Glenamuck District Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18th December 2019 (ABP-303945-19) and is projected to begin construction in Q3/Q4 2022, with completion estimated for Q3/Q4 2024 as advised by Gerry D'Arcy on 25th May 2022.

From: D'Arcy Gerry <[REDACTED]>
Sent: Wednesday 25 May 2022 12:11
To: Foley, Peter <[REDACTED]>; John Carr - DBFL Consulting Engineers <[REDACTED]>
Cc: Neil Durkan <[REDACTED]>; Patricia Thornton <[REDACTED]>
Subject: RE: GDRS - current status

Hi Peter,
 I am pleased to confirm the following relating to the GDRS :

The GDRS shall be delivered as one scheme under a single tender.
 The GDRS has all necessary statutory consents.
 The GDRS has funding for its delivery in place.
 DLRCC shall go to tender in Q2 or early Q3 2022.
 DLRCC expect to be on site Q3/Q4 2022.
 Construction Program estimated 18 -24 months
 Scheme Completed estimated Q3/Q4 2024.

Regards,
 Gerry.

Since the publication of the *Kiltiernan LAP*, a Part 8 application for the Glenamuck Road upgrade was permitted in 2017 (Ref. PC/JC/01/17), which will facilitate an additional 50% of units to be allowed in the *Kiltiernan LAP* area, up to a total of 1,050 No. units. This Part 8 is intended to be constructed at the same time as the GDRS.

As demonstrated in Figure 8.10 above, the subject site is located within both Phase 1 (a)(B) and Phase 1 (b)(C) on the Phasing Map (B and C on the map above). As detailed in the table accompanying Figure 8.11 below, planning permission has been granted for 657 No. dwellings within Phase 1 (a)(B) and for 565 No. dwellings within Phase 1 (b)(C) to date, which is a total of 1,222 No. dwellings. In addition, some 148 No. dwellings have been granted permission in Phase 1 (a)(A) with permission pending for 3 No. additional dwellings.

In total, there are c. 1,370 No. dwellings granted permission in the 3 No. Phases and an additional 3 No. units pending a decision. If permission is granted for the subject development of 383 No. units, this will bring the total to c. 1,753 No. dwellings (plus 3 No. dwellings pending) if the Board is minded to grant planning permission.



Figure 8.11: Planning Applications in Kiltiernan Village in the Vicinity of the Subject Site (Red Line is indicative Only)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

The Table below lists the granted planning applications in Kiltiernan and relates to the numbered sites in the map (Figure 8.11) above.

Map Ref	Phasing Zone (LAP)	Site Location	Reg. Ref.	No. of Units	Final Grant Date	Commenced?	Live Permission or Expired
1.	A	The Leys, Glenamuck Road South	D21A/0100 [ABP-310089-21]	61 No. units	12 th November 2021	Yes	Live
2.	A	Drumkeen, Glenamuck Road	D17A/0520 [ABP-249144-17]	15 No. units	7 th February 2018	No	Live
3.	A	No. 13 Glenamuck Cottages	D16A/0154	2 No. units	29 th November 2016	Yes [complete]	Expired
4.	A	Willow Glen, Glenamuck Road	D15A/0443	31 No. units	1 st June 2016	Yes [complete]	Expired
5.	A	Brambledown, Glenamuck Road	D14A/0766	11 No. units	6 th May 2015	Yes [complete]	Expired
6.	A	Saxaroon and Inglenook, Glenamuck Road	D14A/0765 [ABP-244520-15]	28 No. units	1 st July 2015	Yes [complete]	Expired
7.	A	Tandesann, Glenamuck Road South	D21A/1002	3 No. additional units	Granted by Dun Laoghaire-Rathdown County Council on 15 th June 2022. Application in the Appeal period at time of lodging this planning application.	N/A	N/A
1.	B	Glenamuck Road/ Enniskerry Road SHD	ABP-306160-19	197 No. units	6 th April 2020	Yes	Live
2.	B	Glenamuck Road SHD	ABP-303978-19	203 No. units	26 th June 2019	Yes	Live
3.	B	Rockville Phase 1	D17A/0793	49 No. units	25 th January 2018	Yes [complete]	Live
4.	B	Rockville Phase 1	D19A/0242 [amendment to D17A/0793]	2 No. units	13 th November 2019	Yes [complete]	Live
5.	B	Rockville Phase 2A	D18A/0566 amended by D18A/1191 [ABP-303871-19]	5 No. units	8 th November 2018 / 24 th June 2019	Yes	Live
6.	B	Rockville Phase 2B	D20A/0015 [ABP-306999-20]	56 No. units	2 nd September 2020	No	Live
7.	B	Shaldon Grange SHD	Permission refused under ABP-307506-20 on Material Contravention technicality. Permission granted for relodged application under ABP-312214-21	130 No. units	11 th April 2022	No	Live
8.	A	Cromlech Close	PC/01/07 [Part 8 application]	15 No. units	11 th June 2007	Yes [complete]	Expired
1.	C	Enniskerry Road SHD [Adjoining Bishop's Gate]	ABP-309846-21	203 No. units	15 th July 2021	No – Due to commence in the Summer 2022	Live
2.	C	Suttons Field SHD	ABP-307043-20	116 No. units	28 th August 2020	Yes	Live
3.	C	Slievenamon	D18A/0347 [ABP-303491-19]	22 No. units	28 th June 2019	Yes	Live
4.	C	Golden Ball Pub	D16A/0090 [ABP Ref. PLo6D.246537] D17A/1022 D18A/1133 D18A/1239	61 No. units	Parent permission 27 th October 2016 [Extension of Duration Granted on 15 th November 2021 (D16A/0090/E)]	Yes	Live
5.	C	Bishop's Gate Phase 1	D10A/0716 [ABP Ref. PLo6D.239662]	68 No. units	31 st October 2012	Yes [complete]	Live (EOD Granted 6 th November 2017)
6.	C	Bishop's Gate Phase 2	D18A/0083	27 No. units	13 th September 2018	Yes [complete]	Live
7.	C	Rockhurst	D18A/0137 [ABP-303753-19]	18 No. units	15 th August 2019	No	Live
8.	C	Glebe Road	D16A/0586	38 No. units	24 th February 2017	Yes [near completion]	Live
9.	C	Kingston	Do7A/0899 [ABP Ref. PLo6D.227440] [extension of permission granted to 2018]	12 No. units	31 st October 2008	Yes [complete]	Expired

It can be seen from Figure 8.11 and the accompanying Table set out above, out of the c. 1,370 No. units granted permission, some 1,136 No. residential units have either commenced or completed construction at the time of writing this report (133 No. in Phase 1 (a)(A), 456 No. in Phase 1 (a)(B) and 547 No. in Phase 1 (b)(C)).

However as the GDRS is projected to begin construction in Q3/Q4 2022 and estimated to be completed by Q3/Q4 2024, this lines up with the estimated opening of Phase 1 of the subject development (Q3 2024). Therefore, the proposed development will not give rise to any planning difficulties as the infrastructure is soon to be constructed.

In their assessment of the Enniskerry Road SHD (ABP Reg. Ref. ABP-309846-19), which was granted permission on 15th July 2021, the following was stated in An Bord Pleanála's Order in relation to phasing:

*'The Board considered that the **proposed development is, apart from the phasing parameters of the Kiltiernan-Glenamuck Local Area Plan 2013, as extended to 2023, broadly compliant with the Dún Laoghaire-Rathdown County Development Plan 2016-2022 and the Kiltiernan- Glenamuck Local Area Plan 2013, as extended to 2023, and would, therefore, be in accordance with the proper planning and sustainable development of the area.***

*The Board considered that, while a grant of permission for the proposed Strategic Housing Development would not materially contravene a zoning objective of the Development Plan, **it would materially contravene the Local Area Plan with respect to the programme and phasing of development. The Board considers that, having regard to the provisions of section 37(2) of the Planning and Development Act, 2000, as amended, a grant of permission in material contravention of the Local Area Plan would be justified for the following reasons and considerations:***

In relation to section 37 (2)(b)(i) of the Planning and Development Act 2000, as amended, the proposed development is in accordance with the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, and complies with the Government's policy to increase the delivery of housing as set out in Rebuilding Ireland Action Plan for Housing and Homelessness 2016.

In relation to section 37 (2)(b)(iii) of the Planning and Development Act 2000, as amended, the proposed development is in accordance with national policy as set out in the Project Ireland 2040 National Planning Framework, specifically, National Policy Objective 3(b) which seeks to deliver at least 50% of all new homes targeted in the five cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built up footprints. The proposed development would also supply 94 number high quality apartment units in compliance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2020.

In relation to section 37 (2)(b)(iv) of the Planning and Development Act 2000, as amended, the Board has previously granted planning permission for residential schemes in the immediate vicinity of the subject site, including 197 number residential units (An Bord Pleanála Reference Number ABP-306160-19) and 203 number residential units (An Bord

Pleanála Reference Number ABP-307043-20). The proposed development will reflect the pattern of these permitted developments.

Furthermore, the Bord considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable quantum and density of development in this location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height, density and quantum of development and would 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.’ [Our Emphasis]

In their assessment of the Shaldon Grange SHD (ABP Reg. Ref. ABP-312214-21), which was very recently granted permission on 11th April 2022 (130 No. units), the following was stated in An Bord Pleanála Inspector’s Report in relation to phasing:

*‘To conclude, I do not have undue concerns in relation to traffic or transportation issues. As dealt with above, in the previous section on phasing, I am satisfied that the proposed development can be accommodated on the existing road network until such time as the GDDRS is completed and operational. I note that the Transport Division of the planning authority recommend refusal of permission in relation to phasing/prematurity (this matter is dealt with above), however as stated elsewhere within my assessment, **it appears that works to begin construction of the GDDRS are imminent and that the timelines in relation to the construction of this proposed development and the roads scheme would be similar**’. [Our Emphasis]*

The An Bord Pleanála Order stated the following:

‘The Board considered that a grant of permission could material contravene section 10 of the Kiltiernan-Glenamuck Local Area Plan 2013 in relation to phasing, which applies to the site, would be justified in accordance with sections 37(2)(b)(i),(iii) and (iv) of the Planning and Development Act 2000, as amended having regard to:

- (a) The proposed development is considered to be of strategic or national importance by reason of its potential to contribute to the achievement of the Government’s Policy to increase delivery of housing set out in the Rebuilding Ireland Action Plan for Housing and Homelessness 2016, and to facilitate residential development in an urban centre close to public transport and centres of employment.*
- (b) It is considered that permission for the proposal should be granted having regard to Government policies as set out in the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031 which includes the Metropolitan Area Strategic Plan which identifies strategic residential and employment corridors.*
- (c) It is considered that permission for the proposal should be granted having regard to the Project Ireland 2040 National Planning Framework, National Policy Objective 3b which seeks to ‘deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints’.*

(d) *It is considered that permission for the proposal should be granted having regard to the pattern of development and permissions in the vicinity since the adoption of the Kiltiernan-Glenamuck Local Area Plan 2013.*

In accordance with section 37(2)(b)(i)(iii) and (iv) of the Planning and Development Act 2000, as amended, was satisfied for the reasons and considerations set out in the decision. [Our Emphasis]

Therefore, having regard to this recent grant of permission and the earlier precedents which were considered in assessing this more recent application, it is clear that a material contravention of the phasing of development in Kiltiernan has been accepted and the same parameters pertain to the subject lands.

In addition, the *Kiltiernan LAP* sets out that precedence will be given to applications for planning permission which best achieve and satisfy 13 No. criteria, which are detailed and responded to below:

Criteria	Response
<p>1. Conformity with the Kiltiernan / Glenamuck Local Area Plan, 2013-2019 [now extended to 2023], and which promote and facilitate the achievement of its vision and objectives.</p>	<p>Please see Section 8.0 of this Planning Report & Statement of Consistency, which details how the proposed development is consistent with the <i>Kiltiernan LAP</i>, which has been extended until 2023. Other than as detailed in the Material Contravention Statement, the scheme is in accordance with the <i>Kiltiernan LAP</i>.</p>
<p>2. Demonstration of a high level of architectural quality and urban design and are sympathetic to the special character of Kiltiernan / Glenamuck.</p>	<p>As demonstrated in the enclosed <i>Design Statement</i> prepared by McCrossan O'Rourke Manning Architects, the subject scheme represents a high-quality scheme which will contribute to the special character of Kiltiernan. In particular the proposed Neighbourhood Centre and new Village Green fronting onto Enniskerry Road will activate the street frontage and will be a positive addition to the streetscape and form a new focal point for the Village. The Dingle Way Greenway link will also enhance permeability for the area.</p> <p>As detailed in the <i>Landscape Rationale</i> by RMDA Landscape Architecture, the proposed Dingle Way connection through the site is 'a crucial design feature in making this a livable community, enhancing the marketability of the scheme, improving the quality of residents' lives, and providing space for sustainable drainage...Areas of congregation, informal recreation, and exercise provide a varied</p>

	<i>experience along the greenway, creating a sense of place'.</i>
3. Achievement of local road / footpath improvement and traffic management measures.	The scheme will improve pedestrian facilities along Enniskerry Road by narrowing the carriageway down to 6.5 metres (i.e. a 3.25 metres running lane in each direction) from the front of the kerb on western side of Enniskerry Road. The remaining former carriageway, which varies in width of c. 2 metres, will be reallocated for other road users and will include the introduction of a widened pedestrian footpath and landscaped buffer on the eastern side of the road adjoining the proposed development. There will be a permeable connection from Enniskerry Road through to the future GLDR via the Dingle Way. Pedestrian connections will also be provided to the neighbouring Rockville developments and throughout the site.
4. Consolidation of the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines.	The subject site is not located within the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines. However, we submit that the proposed development will contribute towards the consolidation of Kiltiernan Village as noted in No. 5 below, due to the site's location in the centre of the village and the provision of a new Neighbourhood Centre for the area.
5. Consolidation of Kiltiernan Village.	<p>As the subject site is located in the centre of Kiltiernan Village and will provide the new Neighbourhood Centre for the village, the proposed development represents the sustainable and sequential consolidation of the village, in accordance with the proper planning and sustainable development of the area.</p> <p>The scheme can be appropriately assimilated into the village having regard to the heights and scale proposed and the opening of the site onto Enniskerry Road which includes a Neighbourhood Centre and public open space for the village, which will enliven the streetscape and will improve legibility and permeability and will provide a focus and meeting point for the entire village.</p>

<p>6. Planned within the context of an overall outline Master Plan for individual and affiliated land holdings (in order to prevent piecemeal development).</p>	<p>The enclosed Site Layout Plan prepared by McCrossan O'Rourke Manning Architects, demonstrates how the proposed development will sit in the context of the surrounding environment and how the development will connect into the surrounding lands. In particular we note the connections into the neighbouring Rockville development to the north-east and the future Glenamuck Link Distributor Road to the east. As noted above, the development, which is located in the centre of the village, represents the consolidation of Kiltiernan Village and will fill in a gap between the Rockville development and Enniskerry Road. Therefore, it is clear that the subject development represents a logical, sequential and sustainable insertion to the village and avoids piecemeal development.</p>
<p>7. Compatibility with later phases of development.</p>	<p>The subject development will not prejudice the development of future schemes in Kiltiernan. Please see enclosed <i>Landscape Rationale</i> prepared by RMDA Landscape Architects, which demonstrates linkages to surrounding developments, i.e. Rockville and the future Glenamuck Link Distributor Road in particular, and Enniskerry Road/Glenamuck Road.</p> <p>The subject scheme will sit comfortably in its context and will not impact on the deliverability of surrounding developments. The Neighbourhood Centre will also contribute towards allowing further phases of development to progress, as more services will be provided in the village.</p>
<p>8. Facilitation of the orderly development of adjoining property/land holdings.</p>	<p>As noted under Nos. 6 and 7, the proposed development represents the sustainable development of lands in the centre of Kiltiernan Village which will appropriately consolidate the village, and avoids urban sprawl. The proposed development will contribute towards delivering compact growth, especially as some of the recently granted developments in Kiltiernan are located further from the village core. Various linkages are provided from the site to the surrounding areas. Therefore, the subject</p>

	development facilitates orderly development of adjoining landholdings.
9. Proximity to the Luas Line B1 and within the catchment area for the Section 49 Supplementary Development Contribution Scheme for Luas Line B1.	The subject site is outside of the catchment area of the Section 49 Supplementary Development Contribution Scheme for Luas Line B1. However the subject site is located within Kiltarnan Village and will provide a new Neighbourhood Centre and Village Green for the entire area, representing the consolidation of sustainable infill lands.
10. Availability of environmental services. Specifically, the Council will monitor and have regard to capacity at the Shanganagh Wastewater Treatment Works to ensure that wastewater from any proposed development in the LAP area can be accommodated in accordance with the Wastewater Discharge License for the Works.	A Confirmation of Feasibility has been received from Irish Water on 30 th May 2022, and no issues were raised.
11. Incorporation of acceptable Sustainable Drainage System (SUDS) measures on each development site.	The following SUDS measures have been incorporated into the development as set out in the Engineering Infrastructure Report by Roger Mullarkey & Associates: <ul style="list-style-type: none"> • Green roofs • Permeable paving • Filter drains, • Rainwater butts • Swales • Tree pits • Bio-retention area • Silt-trap/catchpit manholes hydrobrakes • Petrol interceptor; and • Stone lined voided arch retention storage devices.
12. Likelihood of early construction.	The Applicant, Liscove Limited, is committed to developing the subject scheme as soon as possible after receipt of planning permission in relation to the proposed development. The Applicant and their associated family operations have a positive track record of developing sites shortly after receiving planning permission such as the nearby attractive Bishop's Gate development.
13. Provision of an appropriate level of active and passive open space and community	The subject scheme provides c. 18,879 sq m of public open space and c. 2,934 sq m of

<p>facilities. Specifically, the Council, in conjunction with the Department of Education and Skills, will have regard to the capacity of local schools to accommodate development, in accordance with the “Code of Practice on the Provision of Schools and the Planning System”</p>	<p>communal open space, which will greatly enhance the open space provision for the area including the provision of a new Village Green and a connection through the site (the Dingle Way) from the Enniskerry Road to the GLDR. The provision of a Neighbourhood Centre containing a creche, medical facilities, office, retail and a community facility will also greatly enhance the community facilities for Kiltarnan. In addition, please see enclosed <i>Social Infrastructure Report and Retail Services Assessment</i> by KPMG Future Analytics which demonstrates that local schools will have sufficient capacity to accommodate the proposed development.</p>
---	---

To conclude this section, it is clear that permission can be granted for the subject development, notwithstanding that the proposed development may represent a material contravention of the phasing set out in the *Kiltarnan LAP*, especially having regard to recent precedents in Kiltarnan and the fact that the GDRS scheme will be commencing construction this year. It is considered that the addition of 383 No. units and Neighbourhood Centre will not give rise to any significant planning difficulties.

8.2.3 Building Height

The *Kiltarnan LAP* outlines the building heights for the subject site as 2 – 4 No. storeys in Chapter 4. In the *Kiltarnan LAP*, Dwg No. PL-13-417 on page 35 (Chapter 4) demonstrates that heights of 2-4 No. storeys shall be provided at the subject lands:

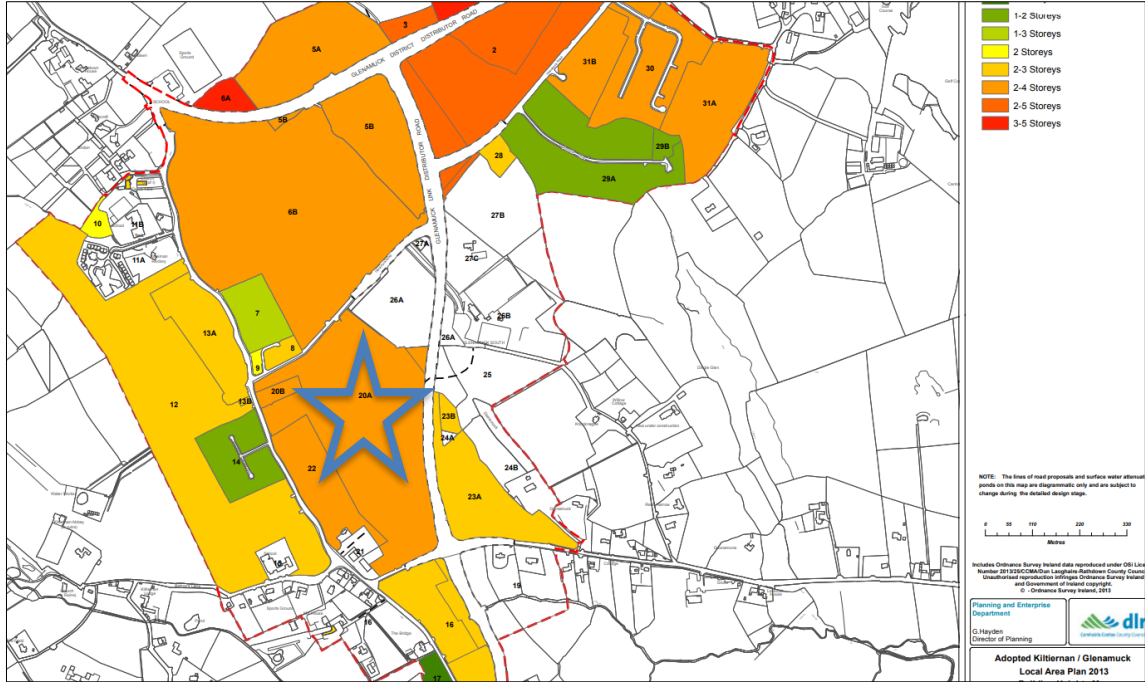


Figure 8.12: Building Height Map [Subject Site Indicatively Denoted by Blue Star]

(Source: *Kiltarnan LAP*, annotated by Thornton O’Connor Town Planning, 2021)

The *Kilternan LAP* further states that:

*'Having regard to the urban/rural edge location of the plan, generally it is considered that a higher rise built form may be acceptable in certain locations but that it should generally not rise above five storeys. Within the Medium-Higher Density Res. zone, while 3-4 storeys would generally be encouraged, up to five storeys will be acceptable but these elements should be focussed primarily on the proposed distributor road, and as corner elements at road junctions. **Within the Medium Density Res. zone 2-3 storeys would be encouraged with four storey elements to be concentrated along the proposed main and link distributor roads, and/or at key entrances to sites**.'* [Our Emphasis]

The subject site is located within a Medium Density Residential Zone, and the *Kilternan LAP* sets out that 2-3 No. storeys would be encouraged in these areas with 4 No. storey elements to be concentrated along proposed main and link distributor roads and/or at key entrances to the site. The proposed development is predominately in accordance with the heights prescribed in the *Kilternan LAP*, with the majority of the scheme ranging from 2-3 No. storeys across the site with a 4 No. storey Neighbourhood Centre. However Apartment Blocks C and D to the north-east of the site extend to 5 No. storeys including podium level. The apartment blocks are located at the proposed entrance from Glenamuck Road where 4 No. storey elements are within the parameters of the *Kilternan LAP*. Therefore the proposed development only slightly exceeds the *Kilternan LAP* parameters by 1 No. storey in a small portion of the site.

It is our professional planning opinion that the subject site is capable of achieving increased height and density having regard to the introduction of the *NPF* and the *Building Height Guidelines*, which encourages increased height and density on appropriate sites. The scheme will enliven the village centre and will provide a community hub within the core of the village. This slight increase in height is fully detailed in the Material Contravention Statement enclosed.

8.2.4 Land Parcel 20A and 22 Development Parameters

The zoning of the lands contained in the *Dun Laoghaire-Rathdown County Development Plan 2022-2028* includes 'Objective A' and 'Objective NC', which has been discussed in Section 8.1.2. As outlined in Section 8.1.2, the proposed development is fully in accordance with the zoning objectives of the *Development Plan*. Please see below the adopted map of the *Kilternan LAP*:

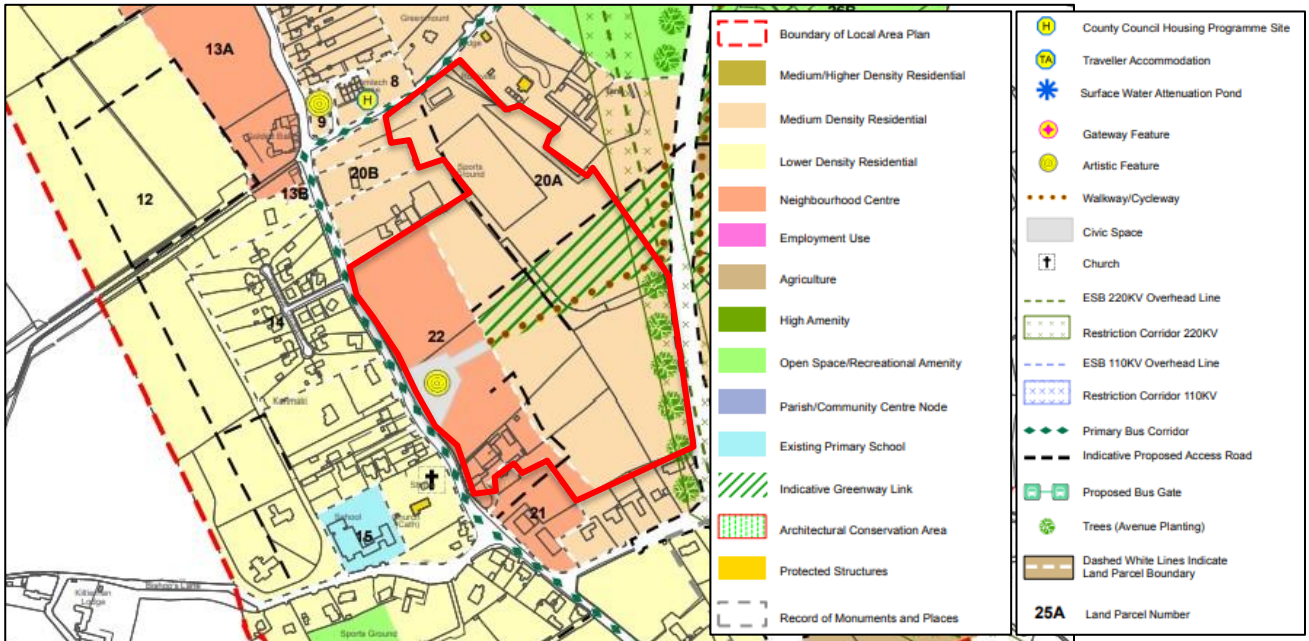


Figure 8.13: Adopted Map from *Kiltiernan LAP* with Subject Site Outlined Indicatively in Red

(Source: *Kiltiernan LAP*, annotated by Thornton O'Connor Town Planning, 2022)

As per Figure 8.13, the adopted map of the *Kiltiernan LAP* designates the site as follows:

- Neighbourhood Centre
- Medium Density Residential

As also demonstrated in Figure 8.13, the site is located within Land Parcels 20A and 22 and we have demonstrated compliance with requirements of these land parcels below:

Item	Parcel 20A	Response	Parcel 22	Response
Zoning	Objective A	As noted above, the development is in accordance with the zoning objectives for the lands.	Objective NC	As noted above, the development is in accordance with the zoning objectives for the lands.
Type of Development	<p>Medium density residential – apartments, duplex, terrace/courtyard.</p> <p>20b - Currently houses Kiltarnan Country Market. In the longer-term, though medium density residential development (apartments, duplex, terrace) would be appropriate. Country Market use could re-locate to a facility within the NC. (The community use and the tradition of a market in this local area is important, not necessarily the building per se.)</p>	<p>The scheme provides a medium density development on the lands including apartments, duplexes and houses.</p> <p>It is noted that the Neighbourhood Centre will be partly located on Parcel 20a (all uses in accordance with the zoning objective as outlined in this report). It is considered that the proposed layout of the Neighbourhood Centre comprises an appropriate layout and will provide a permeable and legible development. For example, the Dingle Way will be passively overlooked by the entire south-eastern boundary of the Neighbourhood Centre. We reiterate that all uses are in accordance with the zoning objectives. The proposed development includes a community facility which will encourage local gatherings.</p> <p>20b is not included in the development lands. Kiltarnan Country Market is located outside of the application lands.</p>	<p>Residential, commercial, retail and community services.</p> <ul style="list-style-type: none"> • This to be the 'heart' of Kiltarnan, i.e. this will be the primary centre. • Emphasis should be on providing facilities for locals, i.e. not to include businesses that 'attract' outside business, although it is acknowledged that may be used by passing through traffic on Link Distributor Road, who may deviate to make use of the facilities. • Design of Centre – need for an integrated development, not piecemeal. This is achievable since all in one ownership. • Could include residential (1/3), commercial/office (1/3) and retail. Office use to include doctors and dentists, etc. rooms • Could potentially include a cultural facility. • Should include an anchor retail facility to provide a much needed retail facility for current and future residents. This anchor store must however be appropriately integrated into the development. • In due course could include accommodation for Kiltarnan Country Market. • Could also accommodate community facilities – health related, post office (no PO in the area). • Potential for accommodating an open air/partially covered market in the central plaza area. 	<p>The proposed Neighbourhood Centre will be the heart and community hub of Kiltarnan. The frontage provided onto Enniskerry Road, through a combination of buildings and open spaces, will enliven the streetscape and will provide a meeting point for the local community.</p> <p>The development of the Neighbourhood Centre will be integrated into the local community, and includes the following (in addition to some residential units):</p> <ul style="list-style-type: none"> • Retail (857 sq m) • Retail (convenience) (431 sq m) • Creche (439 sq m) • Office (317 sq m) • Medical (147 sq m) • Community Facility (321 sq m) <p>There will also be residential units proposed in Land Parcel No. 22. The total Neighbourhood Centre commercial floor area will be 2,512 sq m and includes a community facility. The scheme also includes an anchor convenience retail store integrated into the Neighbourhood Centre, and this, in addition to the other retail units, will serve the future residents and the community of Kiltarnan, which will be a great benefit for the area.</p> <p>There will be a Village Green provided fronting Enniskerry Road and a plaza area surrounding the Neighbourhood Centre. This area could accommodate an open air/partially covered market. It is clear that the proposed Neighbourhood Centre and open spaces will be the heart of the village.</p>
Uses to be specifically encouraged	-		Facilities to serve the local community.	As noted above, the Neighbourhood Centre will make a positive contribution to the services available for the local community, including a specific community facility.
Uses to be specifically discouraged	Use of houses for doctor's rooms, office etc. i.e. 'conversion of residential use'. These type of facilities should locate within NC zoning.	There is currently no active use on the lands and thus this criteria is not applicable.	Facilities that attract non-local users	As well as serving the future residents of the scheme, the Neighbourhood Centre and amenity spaces within the scheme will provide services, facilities and amenities for the wider village.
Density / Plot Ratio	40-45 du/ha	The density of the development will be 44.5 No. units per hectare.	40 –45 units/ha for res. Offices: 1:0.5	<p>The density of the residential development will be 44.5 No. units per hectare.</p> <p>The proposed office space is 317 sq m, with 199 sq m at ground floor and 119 sq m at first floor. We note that the first floor is not directly over the ground floor office, it is located above the retail unit. To achieve a ratio of 1:0.5 with the provision of 317 sq m of office space, this would require a footprint of 159 sq m. The footprint at ground floor is 199 sq m which is slightly</p>

				in excess of the ratio provision. We have included this in the Material Contravention Statement enclosed.
Height	2-4 storeys. Four storey elements to be at locations on road frontages, adjacent to NC ⁷	The scheme principally provides heights of 2 to 3 No. storeys, with the 4 No. storey Neighbourhood Centre and 2 No. apartment blocks to the north of the site providing heights of 5 No. storeys. This is covered in the Material Contravention Statement.	2-4 storeys.	Development on the Neighbourhood Centre lands is in accordance with the height parameters.
Building Materials	To incorporate an element of granite	The material palette currently comprises brick, cladding, render and stone. An element of granite will be incorporated into the boundary walls.	Incorporate element of granite	The material palette currently comprises brick, cladding, render and stone. An element of granite will be incorporated into the boundary walls.
Architectural Style Specifications	Development abutting NC to complement design. Development to have regard for the protected structure 'Rockville' and its associated curtilage.	The scheme design has been considered coherently across the entire development lands to ensure a high-quality development is provided. In relation to the Rockville Protected Structure, there is a 4 No. storey block already existing between the subject lands and the Protected Structure (located in the neighbouring development on the boundary with the subject lands). Sufficient separation distances are provided from the boundary with the neighbouring Rockville development.	Can be contemporary, but including 'vernacular' elements. No 'themed' development. • To include an appropriate water feature, sculpture or the like in the central civic space.	According to MCORM Architects, the Neighbourhood Centre proposes a contemporary language with a rational rhythm of openings combining with vernacular elements that resonate with the special character of the Kiltiernan traditional built fabric. A sculpture will be provided in the central civic space (Village Green), in addition to 3 No. other sculptures throughout the site. Please see the <i>Landscape Rationale</i> enclosed for typical examples.
Special Conditions	-		Any development proposals shall be guided by the general design principles of the Kiltiernan Neighbourhood Framework Plan.	The development has considered the design principles of the <i>Kiltiernan Neighbourhood Framework Plan</i> as detailed further below this table.
Other Comments	<ul style="list-style-type: none"> • Alignment of internal loop and other roads will inform the edge treatment. • Issue of height differential of western portion of land parcel 20a to Glenamuck Road. • Retention in some form of the street furniture at the northern boundary of 20b including the Victorian wall mounted postbox and the built-in stile in the stone boundary wall on Glenamuck Road. • Importance of pedestrian & cycle permeability between 'G' and 'B' zonings to the east through 20a (residential) to the NC use to the west and then across Enniskerry Road to the education and other community uses to the west 	The topography of the site has been fully considered in the scheme design. The road layout has been appropriately considered especially with respect to the connection to the future GLDR and Enniskerry Road and Glenamuck Road. The scheme has also comprehensively considered permeable connections through the site from Enniskerry Road and Glenamuck Road and through the site to the Rockville residential development and to the future GLDR, including the Dingle Way for example. The provision of the Dingle Way is in accordance with the adopted map for the <i>Kiltiernan LAP</i> . Tree planting is also proposed along the site's boundary with the future GLDR in accordance with the adopted map.	<ul style="list-style-type: none"> • Importance of permeability through plaza area from north-east to south-west. • Needs to include recycling facilities. • Parking facilities to be undergrounded or peripheral and/or placed to the 'rear'. 	There are many permeable connections provided through the site from Enniskerry Road and Glenamuck Road through the site to Rockville and to the future GLDR, including the Dingle Way. Bin storage on site will include recycling facilities. Parking is well integrated within the scheme into a well landscaped streetscape, with some spaces provided in an undercroft in the Neighbourhood Centre and in the apartment blocks.

⁷ Section 2.2.2 of the *Kiltiernan LAP* also notes that 'the proposed residential density for Parcel Nos. 20 a & b is 40-50 du/ha, with any higher density to be located proximate to the NC development. Permitted heights would range from 2-4 storeys. An additional access loop road will be required to service these lands'. The justification for providing the 5 No. storeys at the Glenamuck Road entrance away from the Neighbourhood Centre and in proximity to the existing apartment block in the neighbouring Rockville development is outlined in the Material Contravention Statement.

Section 9.1 of the *Kiltiernan LAP* states that

'It is envisaged that this Primary Neighbourhood Centre (Land Parcel No. 22) would include a large convenience store/small supermarket anchor tenant. This store would be designed into the integrated overall design for the centre. Other units suitable as individual shops and retail service outlets, such as newsagent, pharmacy, video store, doctor's surgery or estate agency uses should be provided. Each Local Centre could also include a public house. With regard to the provision of community facilities, it is required that accommodation for community meeting facilities and accommodation for youth activities be provided at the neighbourhood centre nodes.'

The scheme includes an anchor convenience retail store and smaller retail shops, in addition to creche, medical and office units and a community facility. Youth activities can be facilitated at the community facility provided.

8.2.5 Response to Relevant Primary Objectives set out in the *Kiltiernan LAP*

The following Primary Objectives are set out in the *Kiltiernan LAP*. A response has been provided to each Primary Objective.

Primary Objective		Response
Section 2.1 Background to Primary Objectives		
V01	To accommodate a sustainable level of residential and other ancillary development to ensure the wider strategic objectives of the 2010-2016 County Development Plan are realised.	As set out throughout this report, the proposed development represents the sustainable development of this underutilised site in the centre of Kiltiernan Village. We note that some of the recently granted developments in Kiltiernan are located further from the village core and thus the development of the subject lands will ensure the delivery of compact growth.
V02	To establish an obvious identity/sense of place for Kiltiernan.	The scheme will establish an obvious identity/sense of place for Kiltiernan. In particular, the provision of a new Neighbourhood Centre and Village Green along Enniskerry Road will provide a meeting point in the centre of the village for the residents and local community to interact. The scheme will create a sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm.
V03	To establish a focal point/civic node for Kiltiernan.	As noted above in response to Objective V02, the scheme will create a new focal point/civic node for the village, especially due to the provision of a new Neighbourhood Centre and Village Green.
V04	To guide sustainable development in order to establish the character of the two	The proposed development will establish the character of Kiltiernan and will provide new

	component areas that comprise the LAP namely, Glenamuck and Kiltiernan.	services for the local community to utilise, in addition to 383 No. residential units.
V05	Ensure that all projects in the LAP which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application.
V06	The overarching policies and objectives of the Dún Laoghaire Rathdown County Development Plan will equally apply to any development and any associated works, individually or in combination with other plans or projects within the LAP boundary.	As set out in this report, the proposed development is consistent with the relevant objectives of the <i>Development Plan</i> and <i>Local Area Plan</i> (except to the extent identified in the Material Contravention Statement accompanying this application).
V07	The EU Directives for Environmental Impact Assessment (EIA), the Water Framework Directive, the Floods Directive and the Strategic Environmental Assessment (SEA) are the fundamental policy framework of environmental protection measures and legislation for the delivery of the policies within this document and full compliance with the EIA and SEA Directives shall be provided.	The Water Framework Directive is addressed and any potential impacts noted in Chapter 7 of the EIAR and the Hydrogeological Risk Assessment.
Section 2.2 Broad Framework and Principles of Development		
Residential		
REO1	To develop a Plan that facilitates the development of a proper community through the considered use of imaginative and sympathetic design and layout of new residential development.	The subject scheme represents a high-quality scheme which will contribute to the special character of Kiltiernan. The design and layout of the scheme is imaginative and sympathetic and includes varying types of residential units, non-residential uses in a new Neighbourhood Centre and permeable links through and around the site in addition to large open spaces.
REO2	To encourage/ensure the successful integration of future residential developments with the existing built fabric of Kiltiernan/Glenamuck.	As detailed throughout this Report, the scheme will integrate into the surrounding environment, including with other existing and future residential developments in the area.
REO3	To facilitate the provision of appropriate residential densities and a mixture of dwelling units, types and tenures taking into account proximity to public transport corridors, site topography, sites of	As set out throughout this report, the proposed net density of 44.5 units per hectare (uph) will appropriately densify these sustainable and underutilised lands and will yield a significantly more appropriate and sustainable density (and is in accordance with

	archaeological interest/protected structures and natural features.	the parameters of the LAP). The scheme includes 27 No. 1 bedroom units, 128 No. 2 bedroom units, 171 No. 3 bedroom units and 57 No. 4 bedroom units provided in 165 No. houses, 118 No. duplexes and 100 apartments. It is considered that the mix of units and density provided is appropriate and will provide a choice in tenure in the village.
REO4	To integrate an appropriate quantum of social and affordable housing into the LAP.	Some 39 No. Part V units are provided, representing 10% of the total units (383 No.). As the Lands were purchased by Liscove Limited on the 22 nd December 2020, a 10% Part V provision is applicable.
REO5	To facilitate a travellers' accommodation site at a location adjacent to Glenamuck Road.	Not provided or designated for the subject lands.
REO6	To include sustainable strategies in building design that incorporates control of energy consumption, reduction of emissions and the use of renewable and recyclable materials.	An Energy Statement prepared by Waterman Moylan Engineering Consultants is enclosed with this planning application.
REO7	To facilitate the timely provision of appropriate parallel amenity and support facilities for new residential development within the LAP.	The majority of the Neighbourhood Centre will be provided in Phase 2A of the subject scheme i.e. post the construction of 91 No. units of Phase 1. This is to ensure economic viability of the Neighbourhood Centre and a reasonable quantum of housing will be provided before commencement of the Neighbourhood Centre. The community facility and final retail units in the Neighbourhood Centre duplex block will be provided in Phase 5.
REO8	To ensure a critical population threshold in order to support a viable and vibrant neighbourhood centre.	The provision of 91 No. units before the provision of the Neighbourhood Centre will ensure a critical population is provided on site to support a viable and vibrant neighbourhood Centre.
REO9	To ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application. A Hydrological and Hydrogeological Risk Assessment Report prepared by Enviroguide Consulting is also enclosed with this planning application.

Economic Activity		
EO1	To provide existing and future residents with local employment choices in the interests of sustainable communities.	The new Neighbourhood Centre will provide local employment choices.
EO2	To develop specific design responses in respect of scale, form and layout where employment zoned lands are proximate to residential areas.	N/A
EO3	To ensure that any industry development will be subject to Appropriate Assessment (AA) Screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	N/A
EO4	To require that all relevant development proposals are subject to AA screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application. A Hydrological and Hydrogeological Risk Assessment Report prepared by Enviroguide Consulting is also enclosed with this planning application.
Section 3.1.1 Hydrogeology		
LHC1	To ensure that planning applications to take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.	Assessed and any impacts noted in the EIAR.
LHC2	To ensure the implementation of the EU Water Framework Directive, the EU Groundwater Directive and the protection of the groundwater resources in and around the LAP and associated habitats and species.	This has been considered as part of the Appropriate Assessment Screening Report prepared by Scott Cawley Limited.
Section 3.1.5 Water Catchment Areas & Surface Drainage		
LHC3	To ensure the implementation of the EU Floods Directive and its transposition into Irish legislation in order to prevent, reduce and control flood risk in river basin and coastal areas due to increased domestic and economic development in flood risk zones and climate change effects.	The Site Specific Flood Risk Assessment assessed and addressed risks associated with coastal flooding.

LHC4	To implement the recommendations of the relevant Catchment Flood Risk Assessment and Management (CFRAM) study, when published, and the mitigation measures and recommendations arising from the associated SEA and AA shall also be addressed and implemented.	The Site Specific Flood Risk Assessment assessed the CFRAMS and determined the site was a Flood Zone C, where the probability of flooding from rivers and sea is low (less than 0.1% or 1 in 1000 years for both river and coastal flooding).
LHC5	To implement the Planning System and Flood Risk Management for Planning Authorities (DoEHLG/OPW 2009) and the National Flood Hazard Mapping (OPW 2012) while referring to the relevant Flood Risk Management Plan (FRMP) for the LAP.	The Site Specific Flood Risk Assessment assessed in accordance with the Guidelines
LHC6	To require that all proposed flood protection or alleviation works will be subject to Appropriate Assessment (AA) to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	N/A
LHC7	To ensure riparian buffer zones are created between all watercourses and any development, a minimum of 15m to mitigate against flood risk. The extent of these buffer zones shall be determined in consultation with a qualified ecologist and following a Flood Risk Assessment. Any hard landscaping proposals shall be located outside of these buffer zones	N/A
LHC8	Ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream or watercourse in the LAP area and be compliant with the 'Requirements for Protection of Fisheries Habitat during Construction and Development Works at River Sites'.	N/A
LHC9	In the event of lighting being proposed along river or canal corridors an Ecological Impact Assessment (and where necessary an Appropriate Assessment) including bat and otter surveys shall be conducted by	N/A

	specialists. The recommendations of the specialist studies shall be implemented. No lighting will be installed without prior consultation with the National Parks and Wildlife Service (NPWS) and shall be in line with advances in knowledge into the impact of lighting on bats and other species and also to reflect advances in technology in the lighting industry.	
Section 3.2.2 Biodiversity		
LHC10	Conserve, enhance and manage the natural heritage within the LAP area including its biodiversity, landscapes and geological heritage and promote understanding of and sustainable access to it.	<p>The scheme has duly considered the natural heritage of the LAP area. For example, tree retention is a key element of the layout and as a result, some 120 No. trees are retained within the development. Some 659 No. additional trees will also be planted. A Landscape and Visual Impact Assessment has been carried out as part of the EIAR and the EIAR also includes a Land, Soil and Geology Chapter.</p> <p>The scheme promotes access to the large green spaces provided within the development which will ensure sustainable access to natural heritage is promoted.</p>
LHC11	Ensure that all plans and projects in the LAP area which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	<p>An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application. This Report concludes that <i>'it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require a Stage 2 Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)'</i>.</p> <p>A Hydrological and Hydrogeological Risk Assessment Report prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
LHC12	To ensure that a Natura Impact Statement (NIS) is produced if Appropriate Assessment (AA) screening has indicated likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites.	<p>An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application.</p> <p>A Hydrological and Hydrogeological Risk Assessment Report prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
LHC13	To consult with the National Parks and Wildlife Service (NPWS) when	Consultation to the NPWS was carried out in May 2022. No response has yet been received.

	undertaking, approving and authorising development which is likely to affect plant, animal or bird species protected by law. In the event of a proposed development impacting on a site known or likely to be a breeding or resting site of species listed in Habitats Regulations a derogation licence, issued by the Department of Environment, Community and Local Government (DECLG) will be required in advance of a permission.	Need for a derogation licence in the event of the proposed development impacting on a site known or likely to be a breeding or resting site of species listed in Habitats Regulations acknowledged within the Biodiversity Chapter of the EIAR.
LHC14	To ensure the implementation of the EU Freshwater Fish Directive and its transposition into Irish legislation in order to protect any fish and shellfish habitat in the LAP area.	N/A given lack of water source within proposed development boundary.
LHC15	To ensure the monitoring and control of EIA sub-threshold development within the LAP through the document Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding subthreshold development (DEHLG, 2003) with specific reference to the requirement of Appropriate Assessment (AA) screening.	An Appropriate Assessment Screening Report has been prepared by Scott Cawley Limited and is enclosed with this planning application. An Environmental Impact Assessment Report (EIAR) collated by Enviroguide Consulting is also enclosed with this planning application.
LHC16	To promote the protection of habitats which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their contribution as stepping stones (e.g. ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.	The retention of linear habitats including treelines and woodland within the proposed development site has been encouraged and described within the Biodiversity Chapter of the EIAR.
LHC17	To support the National Parks and Wildlife Service (NPWS) and Department of Environment, Community and Local Government (DECLG), in the maintenance and, as appropriate, the achievement of favourable conservation status for the habitats and species to which the EU Habitats Directive applies.	The Biodiversity EIAR Chapter and Appropriate Assessment Screening Report have discussed any potential impacts associated with the proposed development and included mitigation measures where relevant. Additionally, enhancement measures are included within the design.
LHC18	Any significant tree stands should be assessed for retention (where possible) as part of any planning application for development, most notably the stand of pure blackthorn on the 'Objective G' zoned site.	The Arboricultural Assessment prepared by Arborist Associates Limited notes the following: <i>'The objective of the proposed development layout was such as to try and</i>

		<i>retain as much of the important tree lines, groups and belts as possible and to incorporate these into the completed development where they will be an asset to the completed landscaped development and the surrounding area'.</i>
LHC19	To carry out a detailed ranking survey of the hedgerows be undertaken as part of any future development proposals, and where possible to incorporate these hedgerows within the development. It is acknowledged, however, that it will not be possible to retain all of the current hedgerows.	<p>The Arboricultural Assessment categories all survey hedgerows within the development site (and any relevant hedgerows adjacent to the application site boundary).</p> <p>There are 6 No. hedgerows within the site area and 4 No. are proposed to be removed in addition to c. 66 metres of another. The hedgerows have been incorporated as much as feasibly possible and we reiterate that 120 No. trees will be retained.</p>
LHC20	To recognise and contribute towards protection of habitats from alien / invasive species (e.g. Japanese knotweed, giant hogweed, Himalayan balsam, etc.) in accordance with Action Number 4.7 of the Dun Laoghaire-Rathdown Biodiversity Plan 2009-2013.	N/A - No 3 rd schedule invasive species recorded within the proposed development site
3.2.6 Protected Views and Prospects		
LH21	To ensure the preservation of the prospect of Three Rock, Two Rock Mountain and Carrickgollogan from Enniskerry Road and the designated protected views southwards from Ballycorus Road.	The protected views Three Rock Mountain and Two Rock Mountain from the Enniskerry Road (Sandyford -Kiltiernan area) are not affected by the proposed development. The view from Tree Rock Mountain was assessed (Viewpoint 19) but it was concluded that the impact is minor, neutral and medium-term. The proposed development ends up having a minor visual impact on this landscape as it fits within the Kiltiernan settlement, not breaking the existing unity. The proposed vegetation will help to mitigate this visual impact that is identified.
3.3.1 Protected Structures		
LHC22	To comply with all of the policies for the protection of the Architectural Heritage in the current Dún Laoghaire-Rathdown County Development Plan, including those set out in the Development Management Section. In particular to provide appropriate protection for the Protected	<p>There are no protected structures within the site. However, due to the distance to the proposed development site, the following protected structures were considered:</p> <ul style="list-style-type: none"> • Shaldon Grange Kiltiernan Abbey (at Golden Ball) • Rockville House

	<p>Structures and Recorded Monuments in the area.</p>	<ul style="list-style-type: none"> • Church of Our Lady of the Wayside Church • Church of Ireland Parish Church • An Muilleán, 1-9 Moss Cottages, Old Post Office and Orange Lodge • Kiltiernan Lodge <p>The proposed development complies with the policies for the protection of the Architectural Heritage of the listed protected structures, being only two with close proximity (and visibility) to the site – Rockville House and Church of Our Lady of the Wayside Church. The views from close points of the sites of this structures were assessed.</p> <p>Rockville House (Viewpoint 14) - The proposed development has a minor visual impact, as it is on a distant visual plane and is partially hidden by the large existing trees, most of them in Rockville House garden. The development of the proposed vegetation in the northeast periphery of the proposed development will be important for the mitigation of this visual impact, that will disappear in the medium-term.</p> <p>Our Lady of the Wayside Church (Viewpoint 6) - The proposed development ends up becoming the dominant element in this point of view. The visual impact is significant, especially from the garden in front of the church. However, the view is oriented towards a green amenity area of the proposed development, which facilitates better integration with the surroundings, in visual terms. In the medium term, the view will be dominated by the proposed green structure, namely the trees, and by the stone wall in the foreground, next to the road. The minor visual impact of the proposed buildings will be almost totally mitigated.</p>
<p>3.3.2 Conservation Area/ACAs</p>		
<p>LHC23</p>	<p>Any development proposals pertaining to Moss Cottages must respect and take cognisance of the ACA designation for the area, the details of which are described in the "Moss Cottages – Character Appraisal</p>	<p>N/A</p>

	and Recommendations”, available on the Council’s website.	
4.7 Urban Design Issues		
BF01	To promote a vision for a desired character for Kiltiernan, and to establish guidelines to encourage development that will impart the desired character, particularly to the core area, thus creating a sense of place.	The proposed development includes various character areas as set out in the <i>Design Statement</i> .
BF02	To formulate clear guidelines relating to architectural and urban design, building form, 3-dimensional character, materials and landscape elements.	N/A
BF03	To acknowledge surviving features that impart a particular character to the Plan area, and to establish how new development can be fused with these intrinsic features.	N/A
BF04	To encourage the incorporation of granite and granite features into the design of residential and commercial buildings - continuing the tradition of utilising local materials and maximising the visual and economic linkages with the local landscape.	Granite has been incorporated into the boundary walls.
BF05	To provide a ‘Design Statement’ and layout for new residential development, in accordance with the ‘Urban Design Manual - A Best Practice Guide’ (2009) which allows for an attractive living environment while taking advantage of existing natural features, views, sites of archaeological interest, and any other significant features.	A <i>Design Statement</i> prepared by McCrossan O’ Rourke Manning Architects accompanies this planning application which has been prepared with reference to the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009).
BF06	To encourage usage of local placenames wherever possible in new developments.	The naming scheme of the proposed development will include local placenames.
4.8 Housing Design Issues (Part 1)		
a.	A variety of house types – apartments, terraces, semi-detached, detached – should all be considered as possible elements in any development mix.	The scheme includes 383 No. residential units comprising 27 No. 1 bedroom units, 128 No. 2 bedroom units, 171 No. 3 bedroom units and 57 No. 4 bedroom units provided in 165 No. houses, 118 No. duplexes and 100 apartments. It is considered that the mix of units and

		density provided is appropriate and will provide a choice in tenure in the village.
b.	A variety of design is essential in order to create a sense of place. More variants of standard house types assists in achieving good urban design which needs house types that wrap corners, define or enclose spaces, link buildings, etc.	The provision of 165 No. houses, 118 No. duplexes and 100 apartments provides a 'natural variety of design'.
c.	<p>Having regard to the urban/rural edge location of the plan, generally it is considered that a higher rise built form may be acceptable in certain locations but that it should generally not rise above five storeys.</p> <p>Within the Medium-Higher Density Res. zone, while 3-4 storeys would generally be encouraged, up to five storeys will be acceptable but these elements should be focussed primarily on the proposed distributor road, and as corner elements at road junctions.</p> <p>Within the Medium Density Res. zone 2-3 storeys would be encouraged with four storey elements to be concentrated along the proposed main and link distributor roads, and/or at key entrances to sites.</p>	The subject site is located within a Medium Density Residential Zone, and the <i>Kiltiernan LAP</i> sets out that 2-3 No. storeys would be encouraged in these areas with 4 No. storey elements to be concentrated along proposed main and link distributor roads and/or at key entrances to the site. The proposed development is predominately in accordance with the heights prescribed in the <i>Kiltiernan LAP</i> , with the majority of the scheme ranging from 2-3 No. storeys across the site with a 4 No. storey Neighbourhood Centre. However Apartment Blocks C and D to the north-east of the site extend to 5 No. storeys including podium level. The apartment blocks are located at the proposed entrance from Glenamuck Road where 4 No. storey elements are within the parameters of the <i>Kiltiernan LAP</i> . Therefore the proposed development only slightly exceeds the <i>Kiltiernan LAP</i> parameters by 1 No. storey in a small portion of the site. It is considered that the 5 No. storey element is justified having regard to frontage onto Glenamuck Road and the proximity to the existing apartment block in the neighbouring Rockville development. This is included in the Material Contravention Statemen enclosed.
4.8 Housing Design Issues (Part 2)		
a.	Buildings to incorporate an element of granite – this will be a signature material which application will serve to provide a common feature of the various proposed developments.	Granite has been incorporated into the boundary walls.
b.	Designs should if possible avoid obviously faddy themes and the incorporation of an overly excessive assortment of features/detailing. Cleaner/simpler design form results in more sustainable styles.	The scheme incorporates character areas to distinguish the various sections of the site. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality and the scheme design is simple.

c.	The layouts of individual sites should exhibit a clear spatial structure with variety, contrast and identity.	This has been provided in the subject development i.e. variety of units types and non-residential uses which allows a natural contrast between buildings. In addition the site will provide a sense of identity for the village with the provision of the neighbourhood Centre and various open spaces and permeable links.
d.	As a general principle residential layouts should be orientated such that communal open spaces are overlooked and /or significant views are exploited.	All open spaces are overlooked.
e.	As a general presumption, layout details should be sensitive to the requirements of those with disabilities or special needs.	A Universal Access Statement is included with this planning application.
Other:		
i.	Innovative use/mix of material finishes.	<p>The scheme will be provided with high quality materials as described throughout the <i>Design Statement</i>. <i>The Design Statement notes:</i></p> <p><i>'...Depending upon the character areas within the site the materials vary. Between character areas there will be distinct differences between brick types and material choice, elevation treatment and building form in order to create variety and visual interest across the scheme.</i></p> <p><i>...The proposed buildings employ a controlled palette of materials with a mix of traditional and contemporary typologies. The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.'</i></p>
j.	The incorporation of high quality hard and soft landscaping into proposed Development.	High quality hard and soft landscaping has been incorporated into the development. There are various public and communal open spaces provided in the development in addition to permeable links.
5.1 Public Transport		
MT01	To reduce the need for travel by private car within the LAP by:	The development is located within walking distance of bus stops on

	<ul style="list-style-type: none"> • facilitating appropriate frequencies and routings of bus services to address increased population levels, including good linkages to Ballyogan Wood Luas stop on the Luas Green Line, • providing and/or facilitating the development of an interlinked cycle and pedestrian network that would connect the LAP to the wider locality, • maximise pedestrian catchment of bus services operating on Enniskerry and Glenamuck Roads, • encouraging mixed use development to optimise internal trips and make accessibility by non car modes more viable/desirable, • requiring Commercial/Retail uses to operate Mobility Management Plans to provide incentives to reduce dependence on travel by car. • To reduce the need for travel by private car within the LAP and to acknowledge the amenity and health benefits of off-road recreational cycling by providing both on-road and complementary off-road cycling facilities within the Plan area. 	<p>Enniskerry Road and Glenamuck Road and is within c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop. The bus services also provide onward connections to Luas services at Ballyogan Wood. The delivery of the GDRS with its enhanced bus priority measures (see Traffic and Transport Assessment) will provide enhanced connectivity and reliability of services.</p> <p>The masterplan layout has been informed by external developments, connections, amenities, and facilities in mind in order to meet desire lines and promote walking and cycling.</p> <p>The proposal is a mixed use development including a neighbourhood centre that will reduce the need to travel particularly by car.</p> <p>The development provides for off road walking and cycling facilities particularly through the provision of the Dingle Way.</p> <p>A Mobility Management Plan is submitted in support of the planning application.</p>
<p>5.2 Walking and Cycling</p>		
<p>MT02</p>	<p>To promote maximum accessibility through routes of optimised connectivity and permeability for walking, cycling and public transport while establishing safe infrastructure for all vulnerable road users.</p>	<p>The development layout has been designed in accordance with DMURS principles with low traffic volumes and speeds to encourage walking and cycling. The layout is highly permeable with a coherent legible network of streets that meets desire lines and provides both internal and external connectivity.</p>
<p>MT03</p>	<p>It is an objective of the Plan that all new residential and commercial development schemes must include adequate provisions for safe and secure cycle parking facilities at appropriate locations in accordance with County Development Plan standards.</p>	<p>The development will provide secure, sheltered and accessible cycling facilities for all land uses in accordance with DLRCC cycle parking standards.</p>
<p>5.3 Road Network</p>		
<p>MT04</p>	<p>To establish the function, shape and usage of the strategic road network generally within the LAP area.</p>	<p>The layout of the development and the location of its access points reflects the form and function of the road hierarchy.</p>

MT05	To establish the future function of Glenamuck Road in terms of providing local access (including car, bus, pedestrian and cycle) to the wider strategic road network.	The development provides for connections and linkages to and from the Glenamuck Road.
MT06	To establish the appropriate functions of Enniskerry Road in terms of minimising through movements while accommodating locally generated movements (car, pedestrian and cycle) from future developments, and also potential future movements associated with the planned neighbourhood centre facility.	The scheme proposes improvements to the urban realm on Enniskerry Road that will improve the pedestrian and cyclist experience (see Traffic and Transport Assessment enclosed for further details). The development provides an active frontage onto Enniskerry Road that will provide active and passive surveillance.
MT07	To introduce appropriate traffic calming measures and to divert through traffic away from the future LAP civic node in order to address issues such as safety, noise and air pollution, and the potentially negative severance of the component parts of the LAP area.	The proposed Enniskerry Road treatment includes the provision for reducing vehicle dominance and reallocation of spaces to walking and cycling and can be delivered in conjunction with the GDRS to provide traffic calming and enhanced environmental improvements.
MT08	In acknowledgement that some car usage is inevitable, to stipulate maximum car parking provision for differing development types on a demand management basis with appropriate restrictions on on-street parking in order not to undermine that objective.	The level of car parking proposed is balanced to reflect the site characteristics and ensure that sustainable and active travel is not undermined. On street car parking will be managed to ensure overspill car parking does not adversely impact on the urban realm and road safety.
MT09	To have regard to the EU Ambient Air Quality Directive, the EU Ozone Directive, the EU guidance documents Greening Transport (EU 2008) and A Sustainable Future for Transport (EU 2009) and the National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009) to develop strategies which better reflect the real costs that transport volumes and emissions impose onto society, environment and economic efficiency.	<p>The development has regard to EU Ambient Air Quality Directive, the EU Ozone Directive, the EU guidance documents Greening Transport (EU 2008) and A Sustainable Future for Transport (EU 2009) and the National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009).</p> <p>The development accords with principles of National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009) and its update the National Sustainable Mobility Plan vis-a-vis sustainable transport and measures to reduce adverse impacts on air quality through transport.</p>

		The development facilitates the provision of electric charging facilities for cars.
MT10	New developments shall provide noise mitigation measures (e.g. boundary walls and/or double/triple glazing) to reduce noise caused by new roads to within acceptable levels.	An Acoustic Design Statement has been prepared by RSK Ireland Limited. The noise control recommendations require the provision of glazing with minimum sound insulation properties and the provision of acoustic attenuated ventilation with minimum sound insulation properties as outlined in the Report.
MT11	To ensure implementation of the Dublin Agglomeration Environmental Noise Action Plan.	The Acoustic Design Statement has given due consideration to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023' and other documents as detailed in the report.
6.3 Surface Water Drainage		
Elo1	To ensure the implementation of the EU Drinking Water Directive in order to achieve and improve appropriate water quality standards for the LAP for human consumption while conditioning development dependent on sufficient water supply.	Irish Water assessed and determined the water supply to the site is <i>'feasible without upgrades to the network'</i> .
Elo2	To ensure the implementation of the European Communities Drinking Water (No.2) Regulations 2007, S.I. No. 278 of 2007 and the EPA 2010 guidance on the Implementation of the Regulations for Water Services Authorities for Public Water Supplies. These regulations shall be applied for increased penalties in case of non-compliance and programmes to minimise water supply leakage shall be developed.	The water supply network has been designed in accordance with the Irish Water Code of Practice for Water Infrastructure and has been assessed by Irish Water and a Statement of Design Acceptance was issued by Irish Water to that effect.
Elo3	To require that all development relating to water supply and waste water treatment are subject to Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	Screening for Appropriate Assessment prepared and provided.

Elo5	To ensure the changeover from septic tanks to mains connections in all cases where this is feasible and that all new developments utilise and connect to the existing wastewater infrastructure. The provision of individual septic tanks and treatment plants in the LAP will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards will be required, including the EPA 2009 Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e.≤ 10).	The sites wastewater is to connect to the existing piped infrastructure and no septic tanks are proposed.
Elo6	To promote assessment of the adequacy of the existing wastewater treatment facilities in terms of both capacity and performance as well as potential risk to human health and water quality.	The waste water from the site is assessed in terms of impact on water quality in Chapter 7 of the EIAR.
Elo7	To ensure the implementation of the EU Water Framework Directive and its transpositions into Irish legislation.	The Water Framework Directive is addressed and any potential impacts noted in chapter 7 of the EIAR and the Hydrogeological Risk Assessment.
Elo8	To implement the specific relevant objectives and measures for individual water bodies set out in the Eastern River Basin Management Plan and associated Programme of Measures, where relevant. To ensure the implementation of the surface water legislation Environmental Objectives (Surface Waters) Regulations 2009 S.I. No 272 of 2009 and the EPA report Water Quality in Ireland 2007-2009 in order to achieve general improvements of any water supplies in the LAP.	A Stage 1 SuDS Audit was carried out, was passed and was submitted to Dun Laoghaire – Rathdown County Council as required in the Stormwater Management Policy. No issues arose in the audit that contradict the relevant objectives.
Elo9	To require that a Sustainable Drainage System (SuDS) is applied to any development and that site specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and associated River Basin Management Plans.	SuDS measures have been applied across the site as detailed in the Roger Mullarkey and Associates drawings and the Engineering Infrastructure Report & Stormwater Impact Assessment. A Stage 1 SuDS Audit was carried out, was passed and was submitted to Dun Laoghaire – Rathdown County Council as required in the Stormwater Management Policy.

El10	It is a policy of the Council to facilitate the provision, upgrading and maintenance of adequate and appropriate waste water services and water supply to service new developments and in assessing applications will require that development proposed will only take place where appropriate sustainable waste water infrastructure is in place.	The wastewater infrastructure has been assessed by Irish Water and noted as ' <i>feasible without infrastructure upgrade</i> '.
6.5 Waste Management / Landfills		
El11	To ensure the implementation of the EU Waste Framework Directive and its affiliated directives, namely the EU IPPC Directive, the Landfill Directive and the WEEE Directive.	The EU Waste Framework Directive is addressed in the <i>Construction and Demolition Waste Management Plan</i> and <i>Outline Operational Waste Management Plan</i> that are prepared for this application. Chapter 12 of the EIAR also assesses the impact of waste and waste management.
El12	Prevent and minimise the generation of waste in accordance with the Waste Management Plan for the Dublin Region while minimising waste to landfill and considering suitable alternatives.	Diversion of waste from landfill and waste prevention will be the overarching philosophy adopted for the scheme, as noted in the <i>Outline Operational Waste Management Plan</i> .
6.6 Electricity		
110kV Lines	A minimum lateral clearance of 20 metres either side of the centreline (i.e. a 40m wide restricted corridor). A clearance of 23 metres must be allowed for any tower leg.	The proposed development has been designed as to ensure that buildings proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.
220kV Lines	A minimum lateral clearance of 30 metres either side of the centreline (i.e. a 60m wide restricted corridor).	The proposed development has been designed as to ensure that buildings proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.
El13	It is an objective of the Council that high voltage transmission lines in the Plan area be undergrounded, both to improve the visual amenities of the area and to remove the constraints to development presented by the lines. To this end, the Council will work with Eirgrid, ESB Networks and other relevant stakeholders. To encourage and/or facilitate the undergrounding of the	It is the design intent to install all electricity, telephone and television cabling below ground via a ducting system for this development. When liaising with the ESB it was deemed unviable to divert the existing 110kV overhead line below ground due to cost and timelines.

	Arklow-Carrickmines double circuit 220/110kV transmission line and the Carrickmines-Fassoroe 110kV transmission lines Nos. 1 and 2. Where undergrounding is not feasible, to sensitively incorporate any restriction corridors associated with said powerlines into the design of future developments.	
7.0 Open Space and Recreation Facilities		
OSo1	To identify a hierarchy of open spaces and clarity in respect of their function (differentiation between public and private open space.)	This has been set out in the <i>Landscape Rationale</i> by Ronan MacDiarmada and Associates Landscape Architects & Consultants.
OSo2	To provide for linkage/access along open spaces and between different green spaces creating a network linking different functional areas both within and adjacent to the plan boundary.	The scheme includes a network of linkages within the site and through the site to surrounding areas.
OSo3	To acknowledge and respect areas of ecological importance, local topography, watercourses, hedgerows, woodlands, mature trees and views when providing open space and to ensure the protection of ecological linkages when providing open space within the Plan area.	The topography of the site has been fully considered in the scheme design. The road layout has been appropriately considered especially with respect to the connection to the future GLDR and Enniskerry Road and Glenamuck Road. As noted above, the retention of trees is a key element of the scheme and the objective of the proposed development layout was such as to try and retain as much of the important tree lines, groups and belts as possible. The green infrastructure strategy follows an overarching strategy of protecting, creating, enhancing, and connecting the natural heritage and biodiversity value of the lands. A Landscape and Visual Impact Assessment and Biodiversity Chapter have been prepared as part of the EIAR.
OSo4	To provide for recreational cycle paths within open space. (In some instances, cycle paths located within green areas, may need to be linked by cycle track facilities provided along main transportation corridors.)	Permeable links are provided within the site and through to surrounding developments.
OSo5	Landscape design, specification and open space construction to be of a high standard & open space to be designed to be robust,	The proposed open spaces will be high standard, robust, accessible, useable, connected and supervised. Please see the <i>Landscape Rationale</i> enclosed.

	accessible, useable, connected and supervised.	
OSo6	Open space to be designed in a way that protects and enhances biodiversity.	The green infrastructure strategy follows an overarching strategy of protecting, creating, enhancing, and connecting the natural heritage and biodiversity value of the lands.
OSo7	To provide for the appropriate types of active/passive recreational facilities both indoor and outdoor in the LAP for all age groups. Facilities to be provided should be appropriate to the scale and needs of the development area whilst having regard to established or planned amenities in the wider environs. Adequate transport access to these recreational facilities via safe public transport and pedestrian/ cycleway network is paramount.	<p>The proposed play strategy for this scheme provides for structured and natural play spaces throughout the development. The structured play space includes a seesaw, stepping logs, balance beams and an embankment slide and the natural/incidental play space includes grass mounding, timber log, stepping logs and natural stepping stones. Calisthenics exercise equipment is also provided in the scheme. The crèche also includes an outdoor play space.</p> <p>The proposed Neighbourhood Centre will serve the scheme and the surrounding community and is thus appropriate for the subject site. The site has access to public transport and will be provided with a number of pedestrian/cycle linkages.</p>
8.o Social and Community Development		
SCD01	To facilitate an appropriate level of provision of community facilities commensurate with the scale of the new residential communities. (This will include identifying existing community facilities available locally and in neighbouring areas, and identifying additional requirements.)	The development includes the provision of a Neighbourhood Centre which will positively contribute to the provision of facilities in the village. The scheme includes a community facility which will encourage local gatherings.
SCD02	To centralise the existing and proposed community facilities at appropriate locations, where feasible.	The Neighbourhood Centre and Village Green will front Enniskerry Road which is considered an appropriate location.
SCD03	To assess the needs for educational facilities, in particular the possible need to provide a secondary school for the broader area given the extent of development in the wider area, including Stepside/Ballyogan.	The Social Infrastructure Audit prepared by KPMG Future Analytics concludes that <i>'the future demand generated by the proposed development...is likely be absorbed by the existing schools' network...and other planned schools currently under development within the area'</i> .
SCD04	It is the policy of the Council to ensure the reservation of primary and post-primary school sites in accordance with the requirements of the relevant education	The subject site is not designated for these purposes.

	authorities. Schools will be delivered in the LAP area in accordance with the "Code of Practice on the Provision of Schools and the Planning System".	
9.1 Retail and Neighbourhood Centres		
NC01	To provide of an appropriate mix of residential/ commercial/ retail/ community services development in the new neighbourhood centres to ensure a high quality and attractive civic environment, a sense of both place and vitality, and which optimises access to public transport corridors.	Section 2.2 of the <i>Response to ABP Opinion</i> enclosed set out a full response to this item. The scheme providing 383 No. residential units and a Neighbourhood Centre will provide an appropriate mix of uses to serve the surrounding area. The open spaces and community facility etc. will ensure a sense of place and vitality is provided and linkages to the surrounding area will be incorporated, enhancing access to public transport.
NC02	To develop clear permeability and linkages between the neighbourhood centre/s and adjoining land uses.	The scheme includes permeable links such as through the site to the neighbouring Rockville development, via the Dingle Way and the future GLDR, and connections to Enniskerry Road and Glenamuck Road. The Neighbourhood Centre and Village Green will be a clear meeting point for the village and the scheme and will be appropriately linked to the adjoining lands uses within the site (residential).
NC03	To ensure that new development relates to the existing/ established perceived village core, and to respect any key views, landmarks and/or other features, if applicable.	The scheme will enhance the village core and will assimilate into the surrounding environment. There are no Preserved/Protected Views Protected Areas within the study area and the Proposed Development does not affect any protected view identified in the County. Please see the Landscape and Visual Impact Assessment included as part of the EIAR.
NC04	Provision should be made for civic recycling facilities at the Primary Neighbourhood Centre.	The <i>Outline Operational Waste Management Plan</i> prepared by Enviroguide Consulting notes the following: <i>'There are a large civic amenity centres in Shankill and Dun Laoghaire servicing the Dun Laoghaire Rathdown area, with numerous bring banks throughout the region for glass bottle collection.'</i> It is clear that sufficient Bring Centres are available in the area and the Operational Waste Management Plan enclosed does not

	<p>consider it necessary to provide one in the scheme. As a Bring Centre is not required for the scheme, it is considered that it is more appropriate to densify the subject underutilised lands in accordance with National Policy.</p>
--	--

8.2.6 Kilternan Neighbourhood Framework Plan

In addition, the *Kilternan Neighbourhood Framework Plan* ("*Kilternan NFP*"), which is an appendix to the *Kilternan LAP* is applicable to the subject lands.

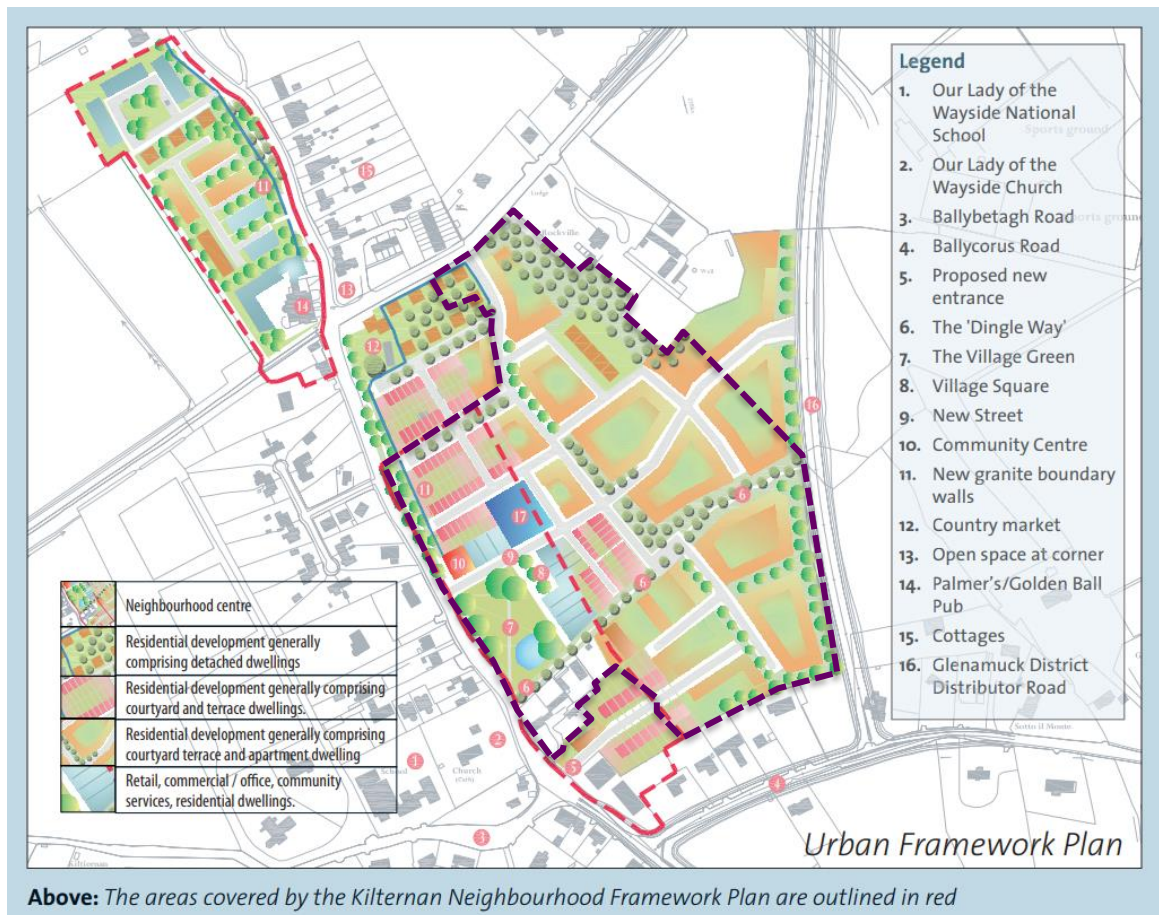


Figure 8.14: *Kilternan NFP* Map, with Subject Site Outlined Indicatively in Purple

(Source: *Kilternan NFP*, annotated by Thornton O'Connor Town Planning, 2022)

The *Kilternan NFP* relates to the dashed red areas outlined in Figure 8.14 above. The subject site is indicatively annotated by the purple dashed line.

The main elements that apply to the subject lands are:

Map Item	Response
The Dingle Way	Provided in the scheme layout
The Village Green	Provided in the scheme layout

Village Square	The community facility is located opposite the principal Neighbourhood Centre block. The angling of the built form of the block together with the angled form of the Neighbourhood Centre creates a plaza space which encapsulates the Dingle Way creating a pedestrian and cycle friendly zone to be enjoyed by all residents and those in the surrounding community. The Neighbourhood Centre generally follows the configuration of the <i>Kilternan NFP</i> , but also extends further into the rear of the site.
New Street	Provided in the scheme layout
Community Centre	Community facility provided to serve the local community, and significant quantum of open space provided which will also provide a meeting hub for the community.
New granite boundary walls	Provided in the scheme layout.

Part 2 of the *Kilternan NFP* states:

'Therefore the framework plan aims to:

- (i) Reinforce the node centred on Our Lady of the Wayside Church and to concentrate retail, commercial and community activities in one area centred on a new 'green' that will become the heart of the village. Maintain the scale and height of existing development along the Enniskerry Road. Direct higher and denser development away from the road edge deeper into the zoned development lands.*
- (ii) Create a self-contained development of complimentary uses on the secondary Neighbourhood Centre on Parcel Nos. 13a and 13b. This development will be designed and set behind stone walls and trees and will not present commercial or retail frontage to the Enniskerry Road in competition with the primary centre.*
- (iii) Strengthen the elements that link these nodes by retaining existing walls where possible and where appropriate, building new walls to create visual and spatial enclosure. At the same time sufficient space for abundant tree planting and generous pavements should be allowed. Co-ordinated lighting, seating and soft planting should be introduced along the Enniskerry Road.'*

The proposed development will reinforce the node centred on Our Lady of the Wayside Church as the scheme will include a new Neighbourhood Centre and Village Green at the subject lands opposite the Church. The commercial and community activities are focused on this area and will become the heart of the village. The scale and height proposed along Enniskerry Road will be appropriate and will enclose the streetscape and activate the Enniskerry Road. The higher density apartment blocks are located away from this location to the north fronting Glenamuck Road.

The boundary treatment along Enniskerry Road will predominantly comprise feature walls along the streetscape and open space. Tree planting and numerous pedestrian entrances will

also be provided include to the Village Green and access to the Dingle Way. Lighting, seating and planting have all be co-ordinated along the Enniskerry Road boundary.

Part 3 the *Kilternan NFP* provides the following images:

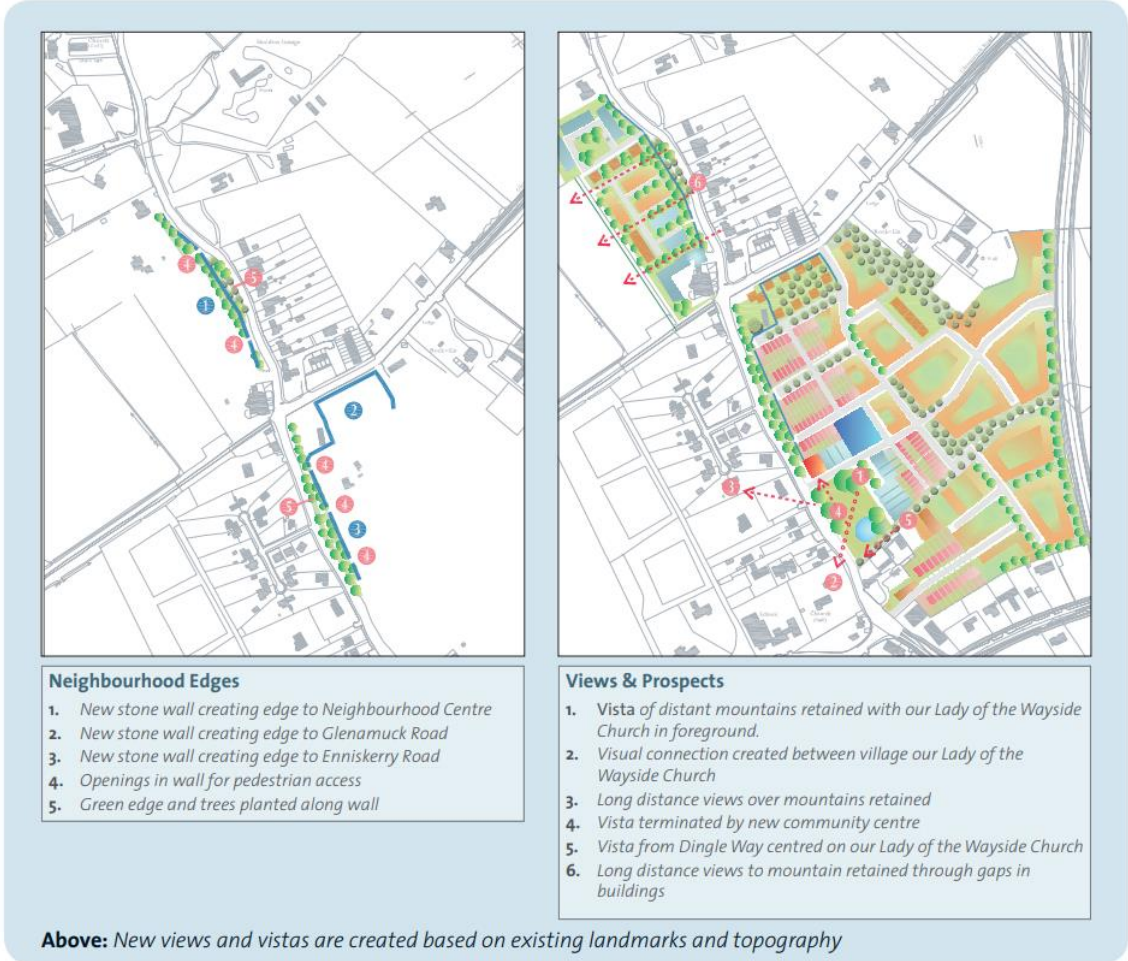


Figure 8.15: Neighbourhood Edges and Views & Prospects of the *Kilternan NFP*

(Source: *Kilternan NFP*, annotated by Thornton O’Connor Town Planning, 2022)

The site includes stone wall edge to Enniskerry Road including openings for pedestrian access and trees planted along the boundary. In addition, there will be many views provided outwards from the new Village Green.

Part 3 of the *Kilternan NFP* provides the following image in relation to proposed cycle and pedestrian routes:



Above: Proposed cycle and pedestrian routes

Figure 8.16: Proposed Cycle and Pedestrian Routes of the *Kilternan NFP*

(Source: *Kilternan NFP*, annotated by Thornton O'Connor Town Planning, 2022)

The following specific aims are provided under the above images in the *Kilternan NFP*:

- (i) To create a new link from the Link Distributor Road of the GDDRS to the Enniskerry Road which will be located as close as possible to the alignments illustrated.
- (ii) To create a new green route the 'Dingle Way' that connects Our Lady of the Wayside Church with the pedestrian route to the Dingle Glen.
- (iii) Generally to create a network of streets and cycleways that can operate in parallel with the Enniskerry Road and which will prioritise pedestrians and cyclists. A pattern of additional streets is shown outside the Framework Plan area to illustrate the concept of the connected street system.

Numerous pedestrian and cycle routes have been provided throughout the site generally in accordance with the above extract from the *Kilternan NFP*. This will significantly improve permeability for the village.

In relation to the specific aims, the scheme includes a link from the GLDR to Enniskerry Road (GLDR = Link Road noted in part (i) above). The Dingle Way route has been provided through the site from Enniskerry Road (fronting onto Our Lady of the Wayside Church) which will also link onto the GLDR. The network of streets and cycleways provided on site prioritises pedestrians and cyclists and will operate in parallel with Enniskerry Road.

Part 3 of the *Kilternan NFP* states:

'Developers of the neighbourhood centres will be required to develop a masterplan which will form the basis for individual planning applications. The masterplan will demonstrate compliance with this Framework Plan and will also include:

- *Details of how the neighbourhood centres relate coherently to adjoining development areas.*
- *Details of how development and infrastructure will be phased including the provision of different uses and services that will serve an emerging community.*
- *Detailed design codes for building and landscape finishes and materials. Codes will also establish palettes for windows, door, railings, roof styles, skyline treatment, etc.*

Once a masterplan is agreed different architectural, landscape designers and practices should be employed on significant planning applications to create a variety of design responses and to avoid repetitious and monotonous development.

MCORM Architects have prepared a Masterplan Site Layout Plan for the subject development. As shown on the Plan, it is clear that the Neighbourhood Centre will relate coherently to the adjoining area i.e. easy access is provided to and from Enniskerry Road and the Village Green will provide a high-quality green space along the Enniskerry Road streetscape. Details on phasing are included with the application and are outlined below or ease of reference:

Phase	Units	Months	Start Month	Completion
Phase 1	91	18	Apr-23	Sep-24
Phase 2	73	24	Apr-24	Mar-26
Phase 2a (Neighbourhood Centre)	53			
Phase 3	59	12	Aug-25	Jul-26
Phase 4	97	18	Feb-26	Apr-28
Phase 5 (Retail & Community)	10	8	Sep-27	Apr-28
Total	383	80		
Total Build period		5.0	Years	

Phase	Other works in Phase
Phase 1	Including Associated drainage, Main Public Open Space, Central Green Way Link, Dingle Way, Off-Site Drainage through Southern Lands - Form Access to GLDR in this phase if GLDR in place. Demolition works.
Phase 2	Form Access to new GLDR (if not completed in Phase 1) - Associated Drainage for Phase
Phase 2a (Neighbourhood Centre)	

Phase 3	Access to Glenamuck Road, and Drainage for Phase
Phase 4	Associated Drainage for Phase
Phase 5 (Retail & Community)	Associated Drainage for Phase

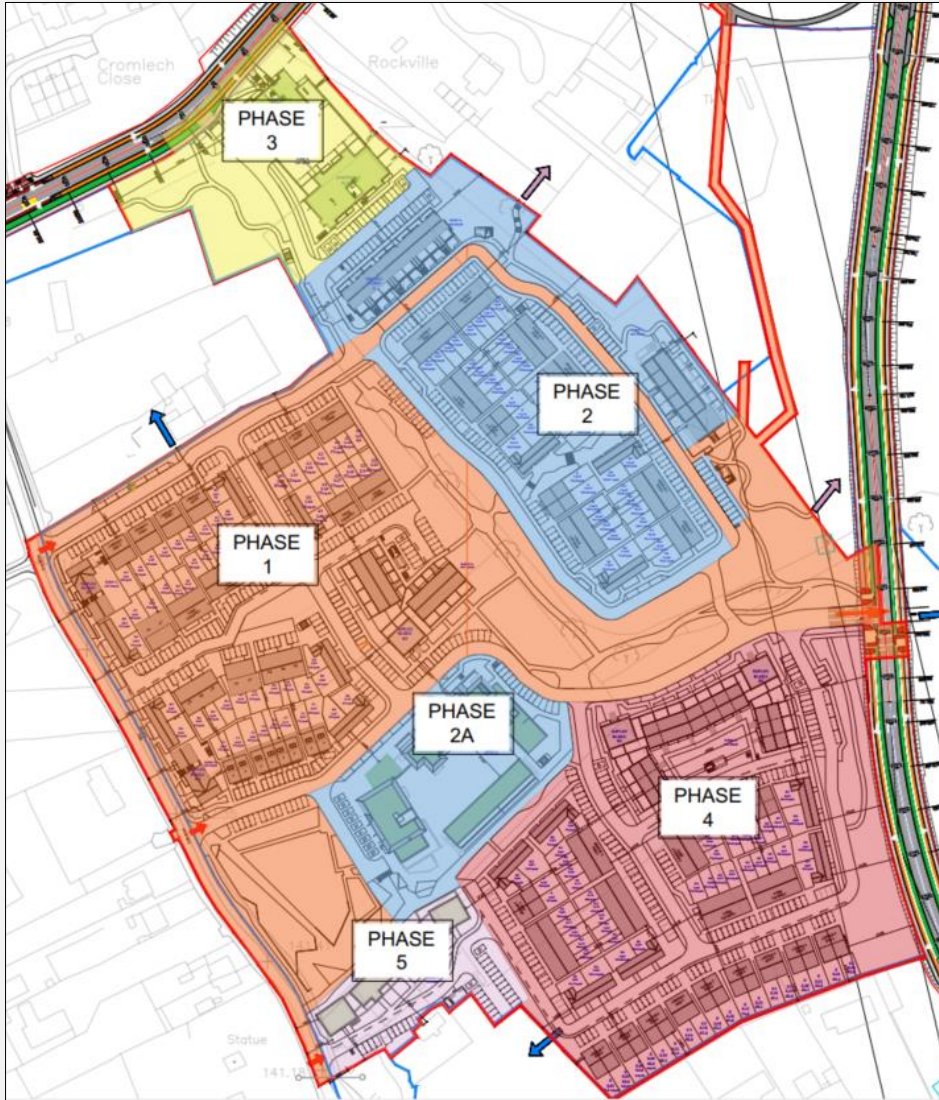


Figure 8.17: Proposed Phasing Plan for the Proposed Development

(Source: MCORM Architects Dwg. PL105, 2022)

The *Design Statement* and *Landscape Rationale* outline the relevant building and landscape finishes and materials, in addition to material palettes, etc. Having regard to the variety of unit types and uses proposed within the development, the scheme naturally avoids repetitious and monotonous development.

In relation to Civic Spaces, Part 3 of the *Kiltarnan NFP* states:

'The Neighbourhood Framework Plan shows the location of the main civic spaces. These are the Village Green, the 'Dingle Way' connecting Our Lady of the Wayside Church to the Dingle

Glen and the smaller green spaces marking the crossroads of the Glenamuck and Enniskerry Roads. Existing trees should be retained and protected where possible and integrated into the new urban form. Proposed tree planting should be semi-mature with a preponderance of native species. The areas around the Village Green and the crossroads should have hard natural stone paving giving a high-quality landscape environment while softer surfaces may be appropriate along the 'Dingle Way' from the 'Blue Church'. It should also be noted that a storm water management plan has been developed for the Plan area. This provides for regional flood attenuation ponds and also stringent Sustainable Drainage Measures (SUDS) on each development site. The primary purpose of these measures is to prevent flooding downstream in the watercourses and also improve the water quality of the watercourses.

Street furniture, while consistent to reinforce the character of the village along the Enniskerry Road, could be themed to strengthen the character of individual spaces. Lighting to provide safe levels of illumination should also be used creatively to enhance the experience of the village. The work of artists should be encouraged to create special and loved spaces.

Along the 'Dingle Way' as many of the key landscape features as possible must be retained and celebrated in order to respect and enhance the uniqueness of the place. Wherever possible, stands of trees should be retained and strengthened. The potential for these spaces to assist wildlife movement, a wide range of walking and cycling circuits and for providing open and play spaces should be explored.

The scheme incorporates the Village Green the Dingle Way and smaller green spaces. Existing trees have been retained where possible (120 No. retained and 659 No. new trees proposed). The mature tree planting will include native species. The area around the Village Green includes feature paving and the Dingle Way is provided with a mix of pedestrian paving and permeable beige tarmac. A Stormwater Impact Assessment prepared by Roger Mullarkey and Associates is included with this planning application.

Street furniture and lighting has been provided where appropriate along the Enniskerry Road frontage / Village Green etc. A sculpture will be provided in the central civic space (Village Green), in addition to 3 No. other sculptures throughout the site which will allow work of local artists to create special and loved spaces. The Dingle Way allows walking and cycling and provides connections to the wider open spaces and play spaces included in the scheme. The Dingle Way also includes proposed and retained trees to assist wildlife movement.

Overall, the scheme layout is generally in accordance with the layout envisioned in the *Kiltiernan NFP*.

8.3 Summary

The proposed development to provide a mixed-use development comprising 383 No. residential units and a Neighbourhood Centre with public and communal open spaces fully accords with the relevant National, Regional and Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in Kiltiernan Village in the interests of sustainable development.

9.0 CONCLUSION

Overall, it is our professional opinion that the proposed development will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing and a Neighbourhood Centre on underutilised lands at the heart of Kiltiernan Village.

The Neighbourhood Centre and Village Green will provide an active frontage onto the existing Enniskerry Road, and the Dingle Way will provide a permeable connection from Enniskerry Road to the future Glenamuck Link Distributor Road (GLDR). It is considered that the subject development will represent the positive regeneration of the subject site.

Having regard to the assessment of compliance with the relevant objectives of the *Development Plan*, *Local Area Plan* and *Ministerial Guidelines*, it is concluded that the proposed development is consistent with the relevant objectives of the *Development Plan* and *Local Area Plan* (except to the extent identified in the material contravention statement accompanying this application) and the relevant ministerial guidelines.

We trust that the submitted planning application pack is sufficient to allow An Bord Pleanála to fully assess the proposed development and to make a decision to grant permission for same.

Yours sincerely

A handwritten signature in dark ink that reads 'Patricia Thornton'.

Patricia Thornton
Director
Thornton O'Connor Town Planning

