



# ARMSTRONG FENTON

ASSOCIATES

**PROJECT:** Strategic Housing Development for proposed residential development on lands at the junction of Santry Avenue & Swords Road, Santry, Dublin 9

**STATEMENT of COMPLIANCE WITH DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022-2028**

**CLIENTS:** Dwyer Nolan Developments Ltd.

**DATE:** June 2022

**Planning &  
Development  
Consultants**



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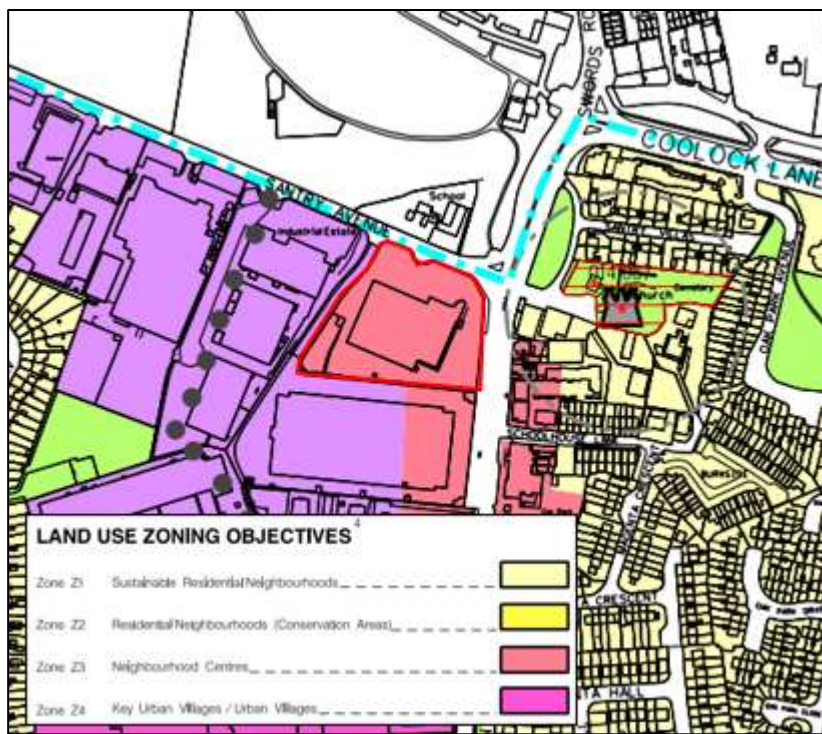
## 1.0 Executive Summary

This is a Statement of Compliance in relation to the Draft Dublin City Development Plan 2022-2028 that was placed on public display from 25<sup>th</sup> November 2021 and 14<sup>th</sup> of February 2022. At the time of submitting this SHD planning application for permission, the 2022-2028 Plan is still in Draft format. Notwithstanding the foregoing, this statement demonstrates that the proposed residential development at Santry, Co. Dublin is consistent with the relevant planning policies, objectives etc. that are contained Draft Dublin City Development Plan 2022-2028.

## 2.0 Draft Dublin City Development Plan 2022-2028

This section contains an assessment of the consistency of the proposed development with the relevant Draft Dublin City Development Plan 2022-2028 (hereafter 'Draft Plan') policies and objectives.

Fig. 1 identifies the location and extent of the site (outlined in red) on an extract from the Draft Plan Zoning Map.



**Fig. 1 – Subject site outlined in red – extract from Draft Plan (Map B)**

The proposed development site is proposed to be zoned objective Z3: *“To provide for and improve neighbourhood facilities”* in the Draft Plan.

The Draft Plan provides guidance in relation to the general appropriateness of particular development types or land uses on lands zoned Z3. The proposed development consists of residential use, along with 4 no. commercial / retail units, a medical suite/ GP Practice unit, a community use hub unit and a residential amenity. Therefore, the proposed development and its associated uses are in compliance with / permitted in principle under the Z3 land use zoning objective attached to the application site.



Use Classes Related to Zoning Objective Z3	
<b>Permissible Uses</b>	Assisted living, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café/tearoom, car park, childcare facility, community facility, craft centre/ craft shop, creative and artistic enterprises and uses, cultural/recreational building and uses, delicatessen, education, enterprise centre, funeral home, garden centre/ plant nursery, guesthouse, home-based economic activity, industry (light), laundromat, live-work units, medical and related consultants, office, off-licence (part), open space, primary health care centre, public service installation, residential, restaurant, shop (local), shop (neighbourhood), sports facility, training centre, veterinary surgery.
<b>Open for Consideration Uses</b>	Advertisement and advertising structures, betting office, civic and amenity/recycling centre, cultural, financial institution, embassy residential, garage (motor repair/service), household fuel depot, internet café/call centre, media-associated uses, off-licence, petrol station, place of public worship, postal hotel/motel, public house, take-away.

**Fig. 2 Proposed Use Classes Related to Z3 Zoning Objective**

**2.1. Development Plan Policies and Objectives**

**Chapter 2: Core & Settlement Strategy**

The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence-based “Core Strategy”(CS) to be incorporated as part of County Development Plans. The purpose of a Core Strategy is to articulate a medium-to longer term quantitative-based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional development objectives. The central focus of the Core Strategy is on residential development and ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for residential development and the projected demand for new housing during the lifetime of the Plan.

Section 2.2 of the Core Strategy of the Draft Plan states: Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment need up to 2028. Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between 21,350 - 31,450 additional persons up to an overall population target of between 625,750 and 640,000 by 2028. The housing demand calculated sets a requirement for the development plan to provide for approximately 40,000 housing units between 2022 and 2028.

The Core Strategy of the Draft Plan was developed in accordance with the National Planning Framework (NPF), supported by the National Development Plan (NDP), is the Government’s high-level strategic plan for shaping the future growth and development of the country to the year 2040, as well as the Eastern and Midland Regional Spatial and Economic Strategy 2019 – 2031 (EMRSES), which is a strategic plan to support



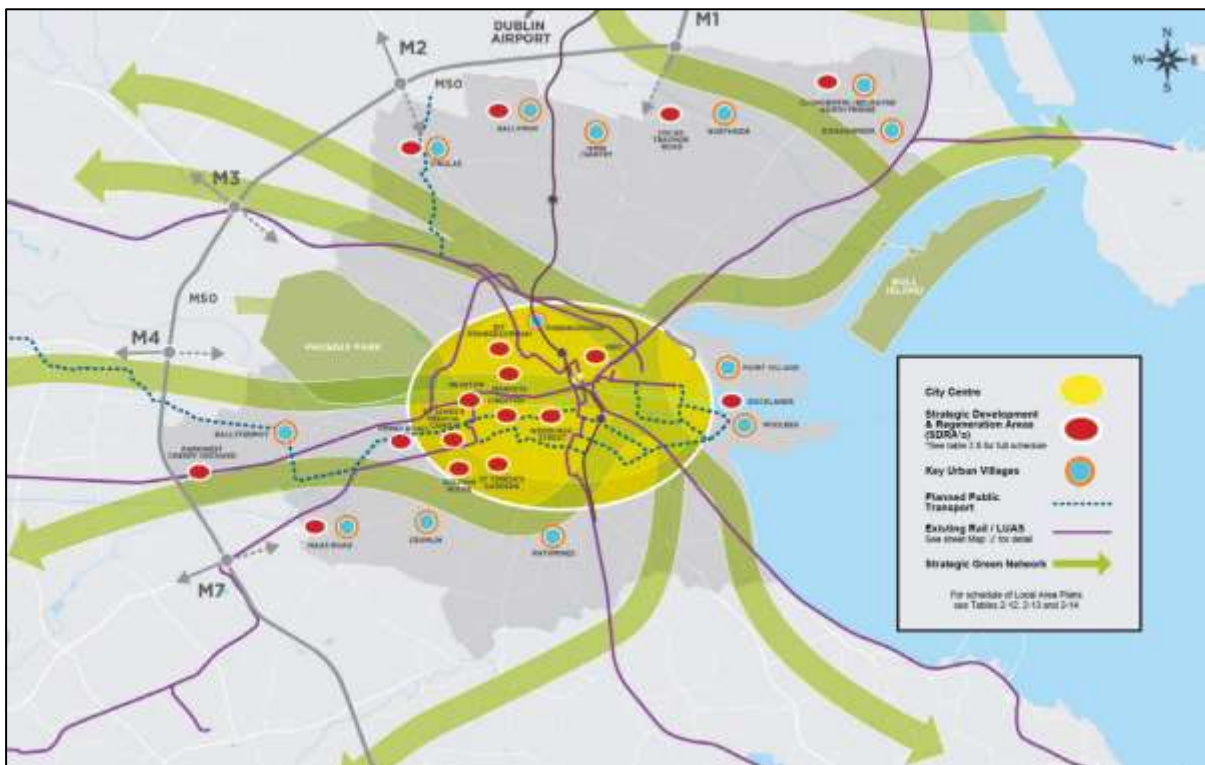
implementation of Project Ireland 2040 (NPF and NDP) and the economic policies and objectives of the Government, by providing a long-term strategic planning and economic framework for the development of the region.

Under the EMRSES, all of Dublin City is located within the Dublin Metropolitan Area (DMA) with a significant area of the County also within the settlement identified as Dublin City and Suburbs. The development within the DMA forms a central part of the policy within the RSES guided by the Dublin Metropolitan Area Strategic Plan (MASP).

The RSES includes population figures for the Region, which envisages Dublin City to grow by an additional 100,500 persons from 2016 to 2031. Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between 21,350 - 31,450 additional persons up to an overall population target of between 625,750 and 640,000 by 2028.

The Core Strategy of the Draft Plan has been based upon the Department of Housing, Local Government and Heritage issued Section 28 Guidelines titled: *“Housing Supply Target Methodology for Development Planning”*, December 2020 (‘the Supply Guidelines’) to assist in providing Planning Authorities with the figures and methodology to incorporate national and regional population and housing projections into their statutory functions.

Table 2.9 of the Draft Plan illustrates the extent of the total housing capacity sites of 45,350 on 501 Hectares on available already zoned land, with the subject site is identified in same as one of the sites within the county that has capacity for additional residential development.



**Fig. 3: Copy of Figure 2-1 of the Draft CDP: Core Strategy Map**

**Compliance:**

The proposed development will deliver new residential accommodation on an underutilised site that has been zoned for Z3 land use for many years. The development will be in close proximity to existing retail and commercial services at OMNI Shopping Centre, existing public transport services (Dublin Bus) and existing schools within the wider Santry area.

The Core Strategy of the Draft Plan seeks to focus development in suitable strategic nodes along existing or planned public transport corridors. The subject lands comprise a strategically located yet underutilised zoned site within the Dublin City and Suburbs settlement boundary.

The proposed residential development will have a net density of c. 233 units per hectare providing an appropriate mix of unit types and sizes, in addition to open spaces and a childcare facility, and is considered to be consistent with the Core Strategy of the Draft Plan.

**Chapter 3: Climate Action**

Chapter 3 of the Draft Plan relates to “*Climate Action*” and contains the following policies / objectives relevant to the proposed development:

**Policy CA1: National Climate Action Policy**

To support the implementation of national objectives on climate change including the ‘*Climate Action Plan 2019 to Tackle Climate Breakdown*’, the ‘*National Adaptation Framework*’ 2018 and the ‘*National Energy and Climate Plan for Ireland 2021 -2030*’ and other relevant policy and legislation.

**Compliance:** The design of the subject development is based upon best practice urban design principles, as and the layout takes into account energy efficiency in the built environment. A Building Life Cycle Report, Resource Waste Management Plan, and other technical documents are submitted with the application in order to ensure that energy consumption within the development, both during the construction and operational phases, is sustainable. The development has been carefully designed and considered to integrate with the permitted Santry Place development to the south, to maximise efficiency of development in the area, and all of the apartment within the scheme will be energy efficient, with target NZEB rating. Electric car charging parking spaces are provided within the development. The basement car park has been designed to easily facilitate the roll out of charging points for electric cars as demand increases. The number of electric vehicle charging points throughout the site equates to the required 10% standard.

**Policy CA2: Mitigation and Adaptation**

To prioritise measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.

**Compliance:** The design of the subject development is based upon best practice urban design principles, as and takes into account energy efficiency in the built environment. Technical documents are submitted with the application which ensure that energy consumption within the development include measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.



### **Policy CA3: Climate Resilient Settlement Patterns, Urban Forms and Mobility**

To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.

**Compliance:** The design of the subject development supports a low carbon, climate resilient city in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019. The proposed seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity in accordance with current Buildings Regulations. Please refer to the accompanying Planning Statement and the Building Life Cycle Report details of compliance with the same.

### **Policy CA7: Climate Mitigation Actions in the Built Environment**

To promote low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for:

- a. building layout and design which maximises daylight, natural ventilation, active transport and public transport use;
- b. sustainable building/services/site design to maximise energy efficiency;
- c. sensitive energy efficiency improvements to existing buildings;
- d. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;
- e. on-site renewable energy infrastructure and renewable energy;
- f. minimising the generation of site and construction waste and maximising reuse or recycling;
- g. the use of construction materials that have low to zero embodied energy and CO<sub>2</sub> emissions; and
- h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.

**Compliance:** The proposed seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity in accordance with current Buildings Regulations and in doing so meeting the highest feasible environmental standards during construction and occupation.

### **Policy CA8: Climate Adaptation Actions in the Built Environment**

Development proposals should demonstrate sustainable design principles for new buildings/services/site. The Council will promote and support development which is resilient to climate change. This would include:

- a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;
- b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;
- c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);
- d. reducing flood risk, damage to property from extreme events— residential, public and commercial;
- e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;
- f. promoting and protecting biodiversity and green infrastructure



**Compliance:** The proposed development has been designed in a manner to be resilient to climate change. Please refer to the accompanying documentation enclosed with the submitted application for confirmation how the proposed scheme demonstrates sustainable design principles for new buildings/services/site.

### **Policy CA23: Waste Management Plans for Construction and Demolition Projects**

To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.

**Compliance:** The submitted scheme is accompanied by a Resource and Waste Management Plan and Operational Waste Management Plan prepared on behalf of the Applicant by AWN Consulting. Please refer to both for confirmation of compliance with best practice.

### **Policy CA24: Electric Vehicles**

To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation

**Compliance:** The development proposals include of 21 no. car parking spaces equipped with vehicle charging point to be provided within basement which is compliant with the standards. Should the demand for EV parking spaces increase beyond supply, additional EV charging facilities can be easily retrofitted.

## **Chapter 4: Shape and Structure of the City**

Chapter 4 of the Draft Plan relates to “*Shape and Structure of the City*” and contains the following policies / objectives relevant to the proposed development:

### **Policy SC9: Key Urban Villages, Urban Villages and Neighbourhood Centres**

To develop and support the hierarchy of the suburban centres, including Key Urban Villages, Urban Villages and Neighbourhood Centres, in order to:

- support the sustainable consolidation of the city and align with the principles of the 15 minute city;
- provide for the essential economic and community support for local neighbourhoods; and
- promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services.

**Compliance:** It is considered that the development wholly supports the above stated policies of the CDP. The development promotes efficient use of an underutilised site thereby supporting sustainable consolidation of the city and sustainable re-development of a brownfield site. The development provides for retail/commercial, and community uses to provide for essential economic and community supports in the area and caters for residential uses on the upper floors. The proposed development is put forward with cognisance to the vibrancy of the existing commercial centre of Santry, and the development will in no way detract from same, rather it will sustain and support existing services and facilities within an increased footfall in line with the Z3 zoning objective requirements.





### Policy SC 10: Urban Density

To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.

**Compliance:** It is considered that having regard to all the above, and Government policy stated in the NPF, the E&MRSES the UD&BHG and the Apartment Guidelines, it is feasible to pursue higher levels of density on the subject site. The development provides for a gross and net density of c. 233 no. dwellings per hectare. It is considered that given the locational context of the site, in close proximity to a number of surrounding services, including public transport links, existing local facilities and education and employment centres, that the proposed density on site is appropriate in this instance and in compliance with the CDP.

### Policy SC 11: Compact Growth

In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:

- enhance the urban form and spatial structure of the city;
- be appropriate to their context and respect the established character of the area;
- include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;
- be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;
- and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.

**Compliance:** The subject application supports the achievement of the above by providing high quality residential development at an appropriate density in proximity to an existing public transport corridor. The development will foster a new community through its mix of unit types and sizes; provision of residential support facilities; high quality architectural design and, landscaped settlement which provides for connectivity and permeability into neighbouring residential schemes, and amenity areas.

### Policy SC 12: Housing Mix

To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.

**Compliance:** The proposed dwellings are a mix of 1, 2 and 3 bed dwellings which cater for a number of lifestyle choices and needs.

### Policy SC 13: Green Infrastructure

To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.

**Compliance:** The Landscape Design Rationale and landscaping plans, prepared by Dermot Foley Landscape Architects and which accompany the application, provide for a series of high-quality landscaped



spaces and green infrastructure network with linkages throughout the development. It is considered that the development caters for active and safe streets and public spaces, through its mixed-use nature, with the proposed layout encouraging passive surveillance throughout the scheme. Proposed public open space are accessible and inclusive to all.

### **Policy SC 19: High Quality Architecture**

To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.

**Compliance:** The proposed development provides for a new urban form and is considered to provide a very high standard of urban design and architecture which will positively contribute to the cities built environment, create a new, memorable, landmark in Dublin 9, for both residents and visitors of the development.

### **Policy SC 20: Urban Design**

Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013).

**Compliance:** Please refer to the accompanying DMURS Statement of Consistency prepared on behalf of the Applicant by DBFL Consulting Engineers which promotes the guidance principles set out in the referred to document.

### **Policy SC 21: Architectural Design**

To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.

**Compliance:** Please refer to the enclosed set of architectural drawings and architectural design statement which details the high-quality architectural design of the proposed scheme.

### **Policy SC 23: Design Statements**

That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.

**Compliance:** Please refer to the enclosed accompanying Architectural Design Statement which have been prepared on behalf of the Applicant by Davey + Smith Architects.

## **Chapter 5: Quality Housing and Sustainable Neighbourhoods**

Chapter 5 of the Draft Plan relates to "*Quality Housing and Sustainable Neighbourhoods*" and contains the following policies / objectives relevant to the proposed development:

### **Policy QHSN1: National and Regional Policy**

To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the



associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.

**Compliance:** The proposed scheme has been designed to accord with the provision of National, Regional and Local Policy. Please refer to the enclosed Planning Statement and Statement of Consistency for details of compliance with all.

### **Policy QHSN2: National Guidelines**

To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets' (DMURS) (2019).

**Compliance:** The proposed scheme has been designed to accord with the provision of Section 28 Guidelines. Please refer to the enclosed Planning Statement and Statement of Consistency for details of compliance with all.

### **Policy QHSN3: Housing Strategy and HNDA**

- (i) To secure the implementation of the Dublin City Council Housing Strategy (Appendix 1) in accordance with the provision of national legislation.
- (ii) To encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the city in accordance with the provisions of the Housing Need Demand Assessment and any future Regional HNDA.

**Compliance:** The development provides for wide variety of high quality residential accommodation to cater for a various different households establishing a sustainable residential community.

### **Policy QHSN10: 15-Minute City**

To promote the concept of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well-designed, safe and inclusive public spaces served by local services, amenities and sustainable modes of transport.

**Compliance:** The enclosed Social and Community Infrastructure Assessment details the local services, amenities and sustainable modes of transport within 15 minutes of the subject site. Please refer to same for confirmation of compliance with the 15-minute city model.

### **Policy QHSN12: Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025**

To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long term vision of improving the physical and mental health and well-being of the population at all stages of life.

**Compliance:** The application demonstrates a vision for improving the physical and mental health of the population at all stages through various means with a connection to Santry Demense, the provision of retail units, a medical suite / GP Practice unit, a community use unit and a residential amenity unit.



### **Policy QHSN15: Accessible Built Environment**

To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building for Everyone: A Universal Design Approach 2012.

**Compliance:** The proposed new development has been designed as accessible to all.

### **Policy QHSN16: Sustainable Neighbourhoods**

To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, i.e. children, people of working age, older people and people with disabilities.

**Compliance:** The proposed new development has been designed to cater to the needs of persons in all stages of their lifecycle, i.e. children, people of working age, older people and people with disabilities.

### **Policy QHSN17: Needs of an Ageing Population**

To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's *'Age Friendly Principles and Guidelines for the Planning Authority 2020'*, the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2020.

**Compliance:** The proposed development has been designed to cater for all, including supporting the needs of an ageing population in the community. Please refer to all enclosed documentation for confirmation of the same.

### **Policy QHSN20: Gated Residential Development**

It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.

**Compliance:** Pedestrian permeability is catered for throughout the scheme, with the development providing for direct links to the Santry Place development to the south. Roads throughout the development have been designed based upon DMURS principles, with the site being highly accessible into and throughout same for pedestrians and cyclists. A Statement of Compliance with DMURS accompanies the application

### **Policy QHSN34: High Quality Apartment Development**

To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.

**Compliance:** The residential development is interwoven with a variety of private, communal & public open spaces. The design provides shared communal open space, while the terraces and balconies provide private open space for residents. Each apartment is carefully designed in compliance with the requirements of the Apartment Guidelines as previously detailed in this statement. Resident support facilities are also catered for as part of the proposal. The development provides for wide variety of high quality residential accommodation to cater for a various different households. The site provides well designed external spaces for both residents and visitors to the site as well as quality landscaping, open space and amenity areas.



### **Policy QHSN35: Houses and Apartments**

To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.

**Compliance:** The site provides well designed external spaces for both residents and visitors to the site as well as quality landscaping, open space and amenity areas.

### **Policy QHSN36: Housing and Apartment Mix**

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.

Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.

**Compliance:** The proposed dwelling mix ensures a variety of apartment types, sizes, and tenures is delivered in a compact urban layout at an efficient density, addressing the required housing needs of both Dublin City and the State. It is also considered the proposed dwelling mix caters for a diverse and appropriate range of housing needs, in accordance with Criterion no. 4 of the Urban Design Manual which recognises that a successful neighbourhood will be one that houses a wide range of people from differing social groups with a good mix of unit types of varying size

### **Policy QHSN37: Management**

To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.

**Compliance:** The development will be maintained by a management company, the details of which are enclosed with the application. A taking in charge drawing is also enclosed with the application.

### **Policy QHSN45: High Quality Neighbourhood and Community Facilities**

To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all.

**Compliance:** The proposed development includes high quality neighbourhood and community facilities via the provision of 4 no. retail / commercial units, a medical suite / GP Practice unit, a community use unit and a one storey residential amenity unit.

### **Policy QHSN46: Community and Social Audit**

To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.



**Compliance:** The enclosed Social and Community Infrastructure Assessment details the local services, amenities and provision of community facilities and infrastructure within the vicinity of the site. Please refer to the same.

#### **Policy QHSN47: Phasing**

To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.

**Compliance:** A phasing proposal is also enclosed with the application. Please refer to same and Phasing drawing prepared by Davey + Smith Architects.

#### **Policy QHSN48: Inclusive Social and Community Infrastructure**

To support the development of social and community infrastructure that is inclusive and accessible in its design and provides for needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse.

**Compliance:** The proposed development provides a residential amenity use unit and a community use unit which provides a space for the needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse to be catered for.

#### **Policy QHSN49: Amenities and Retail**

To ensure all areas of the city, including those that have Local Area Plans, deliver social infrastructure, sports and recreational facilities, retail outlets, schools and infrastructure in accordance to an agreed phasing programme to ensure large neighbourhoods are not left isolated without essential services.

**Compliance:** The proposed development includes the provision of 4 no. retail / commercial units, a medical suite / GP Practice unit, a community use unit and a one storey residential amenity unit.

### **Chapter 6: City Economy and Enterprise**

Chapter 6 of the Draft Plan relates to “*City Economy and Enterprise*” and contains the following policies / objectives relevant to the proposed development:

#### **Policy CEE10: The Outer City**

To support employment growth in the outer city by encouraging the intensification of infill, brownfield and underutilised land, particularly where it aligns with existing and future public transport infrastructure.

**Compliance:** The proposed development complies by intensifying the brownfield and underutilised land, particularly adjacent a Quality Bus Corridor.

#### **Policy CEE12: Transition to a Low Carbon, Climate Resilient City Economy**

To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.



**Compliance:** The design of the subject development is based upon best practice urban design principles, as previously discussed in this statement, and the layout takes into account energy efficiency in the built environment.

### **Policy CEE13: Towards a Green and Circular Economy**

To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.

**Compliance:** The design of the subject development is based upon best practice urban design principles, as previously discussed in this statement, and the layout takes into account energy efficiency in the built environment. The development has been carefully designed and considered to integrate with the permitted Santry Place development to the south, to maximise efficiency of development in the area, and all of the apartment within the scheme will be energy efficient, with target NZEB rating. Electric car charging parking spaces are provided within the development. The basement car park has been designed to easily facilitate the roll out of charging points for electric cars as demand increases. The number of electric vehicle charging points throughout the site equates to the required 10% standard

### **Chapter 7: The City Centre, Urban Villages and Retail**

Chapter 7 of the Draft Plan relates to "*The City Centre, Urban Villages and Retail*" and contains the following policies / objectives relevant to the proposed development:

#### **Policy CCUV6: Large Scale Retail / Mixed Use Developments**

To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.

**Compliance:** The proposed development is considered to make best use of the lands available and caters for a higher, yet appropriate, level of density. The development is located within walking distance of the Swords Road QBC, with bus stops adjacent to the site on both Swords Road and Santry Avenue. Ease of access to public transport services will encourage the use of public transport. Secure bicycle parking is provided within the development for both residents and visitors, with the quantum of parking provided exceeding the required standards of the CDP / Apartment Guidelines thus ensuring the promotion of a modal shift to more sustainable transport needs. A Traffic and Transport Assessment (TTA) and Mobility Management Plan accompany the application which detail the sustainable travel means supported by the development.

#### **Policy CUV23: Active Uses**

To promote active uses at street level in Key Urban Villages and urban villages and neighbourhood centres.

**Compliance:** The proposed development includes the provision of 4 no. retail / commercial units, 1 no. community use unit, 1 no. residential unit and a medical suite / GP Practice unit creating an active street level.

#### **Policy CCUV27: Provision of Convenience Retail**



To promote convenience retail development in the city, particularly in new regeneration areas and where such development can provide an important anchor to secure the vitality and viability of Key Urban Villages, urban villages and neighbourhood centres.

**Compliance:** The proposed development includes the provision of 4 no. retail / commercial units.

#### **Policy CCUV28: Provision of Retail Services**

To support and promote the development of retail service development at all levels of the retail hierarchy in the city.

**Compliance:** The proposed development includes the provision of 4 no. retail / commercial units adding to the existing large number of retail services in close proximity to the subject site.

#### **Policy CCUV38: High Quality Streets and Spaces**

To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.

**Compliance:** It is considered that the development caters for active and safe streets and public spaces, through its mixed-use nature, with the proposed layout encouraging passive surveillance throughout the scheme. Proposed public open space are accessible and inclusive to all. The development provides for a new urban form and is considered to provide a very high standard of urban design and architecture which will positively contribute to the city's built environment, create a new, memorable, landmark in Dublin 9, for both residents and visitors of the development.

#### **Policy CCUV39: Permeable, Legible and Connected Public Realm**

To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.

**Compliance:** The proposed development enables connectivity with neighbouring development and land uses whilst providing healthy placemaking and incorporating green infrastructure.

#### **Policy CCUV40: Public Safety**

To promote the development of a built environment and public spaces which are designed to deter crime and antisocial behaviour and which promote safety, as set out in the '*Your City Your Space*' Public Realm Strategy 2012.

**Compliance:** It is considered that the development caters for active and safe streets and public spaces, through its mixed-use nature, with the proposed layout encouraging passive surveillance throughout the scheme.

#### **Policy CCUV43: New Development**

That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility





**Compliance:** The development provides for high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. The public realm is overlooked by the residential units and from the apartment blocks which have direct access to amenity areas at ground floor level to encourage animation. Linkages are provided from the south at Santry Place to Santry Demense.

## **Chapter 8: Sustainable Movement and Transport**

Chapter 8 of the Draft Plan relates to “*Sustainable Movement and Transport*” and contains the following policies / objectives relevant to the proposed development:

### **Policy SMT4: Integration of Public Transport Services and Development**

To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.

**Compliance:** The development is located within walking distance of a Quality Bus Corridor on Swords Road, with bus stops adjacent to the site. Ease of access to public transport services will encourage the use of public transport.

### **Policy SMT9: Public Realm in New Developments**

To encourage and facilitate the delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers through the Development Management process.

**Compliance:** Computer Generated Images prepared on behalf of the Applicant by 3D Design Bureau demonstrate the high quality public realm proposed as part of this scheme.

### **Policy SMT10: Pedestrian Network**

To protect, improve and expand on the pedestrian network inclusive of facilities for people with mobility impairment and/or disabilities, including the elderly and people with children, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions.

**Compliance:** The proposed development provides for a pedestrian network inclusive of facilities for people with mobility impairment and/or disabilities, including the elderly and people with children, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions.

### **Policy SMT11: Pedestrians and Public Realm**

To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.

**Compliance:** The proposed development enhances the existing underutilised site with sustainable mixed use development, catering for much needed residential development.

### **Policy SMT15: Walking, Cycling and Active Travel**



To prioritise the development of walking and cycling facilities and encourage a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

**Compliance:** Roads throughout the development have been designed based upon DMURS principles, with the site being highly accessible into and throughout same for pedestrians and cyclists.

### **Policy MT17: The Pedestrian Environment**

To continue to maintain and improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

**Compliance:** The proposed development improves the pedestrian environment and promotes the development of a network of pedestrian routes which link residential areas with recreational areas to the north at Santry Demense.

### **Policy SMT010 Cycle Parking Spaces**

To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.

**Compliance:** The proposed scheme complies with required parking standards. Please refer to the enclosed Planning Statement and TTA prepared by DBFL Consulting for confirmation of the same.

### **Policy SMT012: Cycle Parking Facilities**

To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.

**Compliance:** The proposed scheme provides high density cycle parking facilities in line with the required parking standards. Please refer to the enclosed Planning Statement and TTA prepared by DBFL Consulting for confirmation of the same.

### **Policy SMT 25: Car Parking in Residential and Mixed Use Developments**

(i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.

(ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.

(iii) To safeguard the residential parking component in mixed use developments

**Compliance:** The proposed scheme complies with required parking standards. Please refer to the enclosed Planning Statement and TTA prepared by DBFL Consulting for confirmation of the same.

### **Policy SMT 27: Expansion of the EV Charging Network**

To support the expansion of the EV charging network by increasing the provision of designated charging



facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy

**Compliance:** The proposed scheme complies with required EV parking standards. Please refer to the enclosed Planning Statement and TTA prepared by DBFL Consulting for confirmation of the same.

### **Policy SMT 30: Design Manual for Urban Roads and Streets**

To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.

**Compliance:** Please refer to the enclosed DMURS Statement of Consistency prepared by DBFL Consulting for confirmation of the same.

### **Chapter 9: Sustainable Environmental Infrastructure and Flood Risk**

Chapter 9 of the Draft Plan relates to “*Sustainable Environmental Infrastructure and Flood Risk*” and contains the following policies / objectives relevant to the proposed development:

#### **Policy SI1: Support for Irish Water**

To support and facilitate Irish Water in the provision of high quality drinking water, water conservation and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the city and the Region.

#### **Policy SI2: Integrating Water Services with Development**

To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.

**Compliance:** The applicant has engaged with Irish Water prior to the submission of the application and confirmation of design feasibility as enclosed with the application.

#### **Policy SI3: Separation of Foul and Surface Water Drainage Systems**

To require all new development to provide separate foul and surface water drainage systems.

**Compliance:** The development caters for separate foul and surface water drainage systems and incorporates SuDS as feasible.

#### **Policy SI4 Drainage Infrastructure Design Standards**

To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).

**Compliance:** The development complies with the requirement listed above. Please refer to the civil infrastructure drawings and Engineering Services Report for confirmation of the same.



### **Policy SI5 Safeguarding of Public Water Services Infrastructure**

To work in conjunction with Irish Water to safeguard existing water and drainage infrastructure by protecting existing wayleaves and buffer zones around public water service infrastructure.

**Compliance:** The applicant has engaged with Irish Water prior to the submission of the application.

### **Policy SI15: Site-Specific Flood Risk Assessment**

All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with: • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014, and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan. • The application of the sequential approach, with avoidance of development in areas at risk of flooding as a priority. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B4 of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes.

**Compliance:** Please refer to the enclosed SSFRA prepared on behalf of the Applicant by DBFL Consulting Engineers for full details.

### **Policy SI22: Sustainable Drainage Systems**

To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works. Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.

**Compliance:** Please refer to the enclosed detailed Engineering Services Report and accompanying drawing pack prepared on behalf of the Applicant by DBFL Consulting Engineers for full details of compliance.

### **Policy SI23: Green Blue Roofs**

To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green and Blue Roof Guide (2021) which is summarised in Appendix 11.

**Compliance:** Sustainable Urban Drainage Systems (SuDS) are incorporated into the development as feasible.

### **Policy SI30: Waste Management in Apartment Schemes**

To require that the storage and collection of mixed dry recyclables, organic and residual waste materials



within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).

**Compliance:** Please refer to the enclosed Operational Waste Management Plan prepared by AWN Consulting on behalf of the Applicant for full details.

#### **Policy SI41: Lighting Standards**

To provide and maintain high quality and appropriate street/ outdoor lighting on public roads/ footways/ cycleways/ public realm throughout the city in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates.

**Compliance:** Please refer to the enclosed Public Lighting Layout Plan and Report prepared by Sabre Electrical for compliance with the detailed requirements listed above.

#### **Policy SI42: Light Pollution**

To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.

**Compliance:** Please refer to the enclosed Public Lighting Layout Plan and Report prepared by Sabre Electrical for compliance with the detailed requirements listed above.

#### **Policy SI43: Energy Efficient Lighting**

To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.

**Compliance:** Please refer to the enclosed Public Lighting Layout Plan and Report prepared by Sabre Electrical for compliance with the detailed requirements listed above.

### **Chapter 10: Green Infrastructure and Recreation**

Chapter 10 of the Draft Plan relates to "*Green Infrastructure and Recreation*" and contains the following policies / objectives relevant to the proposed development:

#### **Policy GI4: Accessibility**

To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.

**Compliance:** The proposed development is designed to be accessible from both Santry Avenue and Swords Road, with the creation of a new civic space as well as a pedestrianised routes inviting people from the permitted Santry Place, to the south, into the centre of the development to utilise the new urban open



space, which has been carefully positioned within the scheme with a lack of barriers to encourage permeability throughout and onto Santry Park to the north. All open spaces and access routes in the development are overlooked ensuring there will be no secluded footpaths that could lead to anti-social behaviour. Access to the apartment blocks is via these open spaces, which will ensure they are well used. The public realm is overlooked by the residential units and from the apartment blocks which have direct access to amenity areas at ground floor level to encourage animation.

#### **Policy GI5: Greening of Public Realm / Streets**

To integrate urban greening features including nature based solutions into the existing public realm where feasible and into the design of public realm projects for civic spaces and streets. The installation of living green walls will be encouraged to the fullest possible extent throughout the city of Dublin.

**Compliance:** Please refer to the enclosed landscaping architecture details which detail the urban greening of the proposed public realm.

#### **Policy GI24: Multi-Functionality**

To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).

**Compliance:** It is considered that the development caters for active and safe streets and public spaces, through its mixed-use nature, with the proposed layout encouraging passive surveillance throughout the scheme. Proposed public open space are accessible and inclusive to all. The development provides for a new urban form and is considered to provide a very high standard of urban design and architecture which will positively contribute to the city's built environment, create a new, memorable, landmark in Dublin 9, for both residents and visitors of the development.

#### **Policy GI28: New Residential Development**

To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.

**Compliance:** In accordance with the Z3 zoning attached to the site, the development provides for 13% of the site area as public open space.

#### **Policy GI51: Children's Playing Facilities – General**

To seek the provision of children's playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds.

**Compliance:** In accordance with the Z3 zoning attached to the site, the development provides for 13% of the site area as public open space. As part of the landscaping and open space provision on site, play areas are catered for.

### **Chapter 12: Culture**



Chapter 12 of the Draft Plan relates to “*Culture*” and contains the following policies / objectives relevant to the proposed development:

### **Policy CU12: Cultural Spaces and Facilities**

To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments to meet the needs of an increased population within the city.

**Compliance:** The proposed development includes the provision of 4 no. retail / commercial units, a medical suite / GP Practice unit, a community use unit and a one storey residential amenity unit.

### **Chapter 15: Development Standards**

Chapter 15 of the Draft Plan sets out the development standards and criteria that seek to ensure development takes place in an orderly and efficient manner. The following development standards are relevant to the proposed development which have been considered under the headings contained within Chapter 15 of the Draft Plan:

#### **15.2.4 Interest in Property**

With regard to submitting a planning application, under the Planning and Development Regulations, 2001 (as amended), an applicant who is not the legal owner of the land or structure in question must submit a letter of consent from the owner in order to make the planning application.

**Compliance:** The vast majority of the site is owned by the applicant; however, due to the nature of some public realm works included for as part of the proposed development a small portion of the site, where it addresses Santry Avenue and Swords Road, is under the control of Dublin City Council. In addition, the previously permitted entrances to the site (granted under Dublin City Council Ref. 2713/17) are under the control of Zoltorn Ltd.

Enclosed as part of the application are 2 no. letters of consent in relation to same i.e. 1 no. prepared by Dublin City Council & 1 no. prepared by Zoltorn Ltd, consenting to the inclusion of lands within their control within the red line of the planning application - please refer to same for further details.

#### **15.3 Environmental Assessment – EIA / AA / Ecological Impact Assessment**

**Compliance:** An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the development proposal and accompanies the application. Additionally the application is accompanied by an Appropriate Assessment Screening Report has been prepared by Enviroguide Consulting Ltd. and accompanies the application. Please refer to both for full details.

#### **15.4 Key Design Principles**

**Section 15.4.1** refers to **Healthy Placemaking** - the proposed development has been designed to promote activity and provide vitality to an area, positively contributing to public health and well-being. The proposed development has been designed to support the creation of sustainable neighbourhoods and healthy communities, which facilitates active travel including walking and cycling, close to public transport.

**Section 15.4.2** refers to **Architectural Design Quality** - encouraging imaginative, innovative and contemporary architecture in development proposals, provided that it respects Dublin’s heritage and local



distinctiveness and enriches the city environment. It is submitted that the design, use of materials and finishes proposed in the scheme will make a positive contribution to the townscape and urban realm, and to its environmental performance. Please refer to the enclosed Architectural Design Statement prepared by Davey + Smith Architects for details of how the architectural design quality

**Section 15.4.3** refers to **Sustainability and Climate Action** – it is submitted that the development proposal will minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.

**Section 15.4.4** refers to **Inclusivity and Accessibility** – in line with the requirement listed, the proposed development has been designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.

**Section 15.4.5** refers to **Safe and Secure Design** – the proposed development complies with the requirements listed with the scheme designed to promote safety and security and avoid anti-social behaviour.

## **Section 15.5 Site Characteristics and Design Parameters**

**Section 15.5.1** refers to **Brownfield, Regeneration Sites and Large-Scale Development** – the proposed schemes innovative, high quality urban design in it's design which respects and enhances the character area of the site.

**Section 15.5.4** refers to **Height – the height of the proposed development contravenes the height strategy of the Draft CDP. The application is accompanied by a Material Contravention Statement which details how the proposed scheme contravenes the current Development Plan.**

**Section 15.5.5** refer to **Density – the draft plan states that** Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 Guidelines which seek to consolidate development within exiting urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities. It is submitted the proposed development complies with the above statement.

**Section 15.5.6** refers to **Plot Ratio & Site Coverage** – the proposed scheme complies with the standards listed. Please refer to the enclosed Planning Statement for confirmation of the same.

**Section 15.5.7** refers to **Materials and Finishes** – the proposed materials have been chosen to complement the existing pallet of materials in the surrounding area which promote durability and ensure a good visual appearance over time. Please refer to the enclosed architectural drawings and architectural design statement for confirmation of the same.

**Section 15.5.8** refers to **Architectural Design Statements** – the proposed development is accompanied by an Architectural Design Statement by Davey + Smith Architects. Please refer to the same.

**Section 15.5.9** refers to **Models and Photomontages** – the submitted planning application is accompanied by a set of photomontages complying with this requirement prepared by 3D Design Bureau.





## 15.6 Green Infrastructure and Landscaping

**Section 15.6.1** refers to **Green Infrastructure** – the proposed developments complies with the requirements listed in 15.6.1 by increasing connections and improving accessibility for pedestrians to the wider GI network and Santry Park to the north.

**Section 15.6.2** refers to **Surface Water Management and SuDs** – the proposed development utilises SuDs measures in accordance with the requirement listed. Please refer to the enclosed engineering drawing pack for details in their entirety.

**Section 15.6.3** refers to **Green / Blue Roofs** – the proposed development incorporates green roofs on each of the blocks in line with the requirement listed in Section 15.6.3. Please refer to the enclosed architectural drawing pack for details of the same.

**Section 15.6.5** refers to **Urban Greening** – the proposed development complies with the requirement of Section 15.6.5 with the provision of tree planting, pocket parks and green roofs.

**Section 15.6.7** refers to **Landscape Design Rationale**- the proposed application is accompanied with by a Landscape Design Rationale prepared on behalf of the applicant by Dermot Foley Landscape Architects. Please refer to same.

**Section 15.6.8** refers to **Landscape Plans and Design Reports** – the application submitted, for 350 no. units; is accompanied by landscape plans and design reports prepared Dermot Foley Landscape Architects.

**Section 15.6.12** refers to **Public Open Space and Recreation** – the proposed development incorporates public open space in compliance with the requirements in Section 15.6.12. The Public Open Space provided utilises a combination of hard and soft landscaping to cater for a wide range of needs.

**Section 15.6.13** refers to **Boundary Treatments** – details of proposed boundary treatments, including vehicular entrance details; have been submitted as part of the application via the architectural and landscaping material.

## 15.8 Residential Development

**Section 15.8.1** refers to **Quality / Making Sustainable Neighbourhoods** – the proposed development has been designed to foster the creation of attractive sustainable neighbourhoods. Please

**Section 15.8.2** refers to **Community and Social Audit** – the submitted planning application is accompanied by a Social Infrastructure Assessment detailing the community facilities within the catchment area of proposed development.

**Section 15.8.5** refers to **Public Realm** – the proposed development provides new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to navigate and create safe and secure environments.

**Section 15.8.6** refers to **Public Open Space** – Public open space for the development provided for in linear form, centrally located between Blocks C, D, E, & F. The proposed public open space provision equates to c. 1.915 sq.m representing c. 13% of the site area. The public open space provision for the development is therefore in compliance with the requirements of the CDP.

The proposed public open space has been strategically located to align with the permitted public open space



provision for the Santry Place development to the immediate south, allowing for visual integration between proposed and permitted developments and maximising meaningful, usable, space.

**Section 15.8.8 refers to Play Infrastructure** - the development site lies within a two-minute walk of Santry Park. It is due to this proximity to a large, diverse open space, that the landscape strategy caters for the play needs of younger children. A variety of nature play equipment is proposed within public and communal open spaces on ground floor and roof terraces, integrated within the wider landscape and ideally located to allow for passive surveillance. Nature play equipment is proposed in the form of a rope course, trails of timber logs, various balancing equipment and a see-saw and play huts in the communal space. All play elements are situated amongst proposed trees and surrounded by planting.

**Section 15.8.9 refers to Naming of Residential Estates** – the proposed development, if permitted; is open to an appropriate condition for naming the development in accordance with Section 15.8.9.

**Section 15.8.10 refer to Gated Communities** – the proposed development promotes permeability and accessibility in the urban area in line with the requirement of Section 15.8.10.

## 15.9 Apartment Standards

**Section 15.9.1 refers to Unit Mix-** the proposed development shall in line with the Specific Planning Policy Requirement 1 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 unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process. The proposed development comprises 113 no. 1 beds, 218 no. 2 beds and 19 no. 3 beds and complies with the listed requirements.

**Section 15.9.2 refers to Unit Size / Layout** – this section states the required minimum floor areas for apartments, which are in line with Specific Planning Policy Requirement 3.

**Section 15.9.3 refers to Dual Aspect** – the proposed development complies with the requirements listed with 53% of the proposed units dual aspect. This exceeds the requirement listed for at least 50% dual aspect units.

**Section 15.9.4 refers to Floor to Ceiling Hight** – the proposed floor to ceiling height complies with the minimum requirement of 2.7m for ground floor and 2.4m in upper floors.

**Section 15.9.5 refers to Lift, Stair Cores and Entrance Lobbies** – the proposed development complies with the requirements with each block consisting less apartments than the permitted maximum 12 apartments per core.

**Section 15.9.6 refers to Internal Storage** – each proposed apartment unit complies with the internal storage requirements listed. Please refer to the enclosed Housing Quality Assessment for confirmation of the same.

**Section 15.9.7 refers to Private Amenity Space** – private amenity space provided meets the requirements listed in Section 15.9.7. Please refer to the enclosed Housing Quality Assessment for confirmation of the same.

**Section 15.9.8 refers to Communal Amenity Space** – Communal open space is catered for within the development as follows: (i) between Blocks E, F, & G (c. 707 sq.m) (ii) between Blocks A, B, C, & D (c. 1,190.2sq.m), and (iii) in the form of roof gardens located on Block A (c. 267.1sq.m), Block C (c. 418.6sq.m), Block F (c. 436.2 sq.m), and on the proposed residential amenity use unit (c. 104.6 sq.m). Therefore, in



totality, the proposed communal open space provision for the development equates c. 3,122 sq.m. The landscaping plans submitted with the application, including for boundary treatments, ensure that public, communal & private open spaces will be clearly defined and differentiated.

Based on all the above, it is clear that the development is in compliance with the communal open space standards of the Draft CDP.

**Section 15.9.9** refers to **Roof Terraces** – the proposed scheme in the form of roof gardens located on Block A, Block C and Block F. Please refer to the enclosed architectural drawings for confirmation of the same.

**Section 15.9.10** refers to **Internal Communal Facilities** – the proposed development provides both a community use unit and a residential amenity unit to be used by both residents and non residents in accordance with the requirements listed in Section 15.9.10 of the Draft CDP.

**Section 15.9.11** refers to **Security** – The proposed development is designed to incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The development is accessible from both Santry Avenue and Swords Road, with the creation of a new civic space as well as a pedestrianised routes inviting people from the permitted Santry Place, to the south, into the centre of the development to utilise the new urban open space, which has been carefully positioned within the scheme with a lack of barriers to encourage permeability throughout and onto Santry Park to the north.

**Section 15.9.12** refers to **Access and Services** – All open spaces and access routes in the development are overlooked ensuring there will be no secluded footpaths that could lead to anti-social behaviour. Access to the apartment blocks is via these open spaces, which will ensure they are well used. The public realm is overlooked by the residential units and from the apartment blocks which have direct access to amenity areas at ground floor level to encourage animation.

**Section 15.9.13** refers to **Refuse Storage** – The managed apartment development will have ample provision for recycling in the basement with segregated waste bin stores provided.

**Section 15.9.14** refers to **Lifecycle Reports** – The application is accompanied by a number of documents and technical report in relation to same (e.g. the Building Life Cycle Report) which outlines how the development will be energy efficient – please refer to the enclosures submitted as part of the application for further details. Please refer to the same.

**Section 15.9.15** refers to **Operational Management and Maintenance** – On behalf of the Applicant, AWN Consulting have prepared an Operational Waste Management Plan. Please refer to the same for full details.

**Section 15.9.16** refers to **Microclimate** – On behalf of the Applicant Chris Shackleton Consulting has prepared the enclosed Daylight Shadow Assessment. Please refer to the same for details of compliance.

**Section 15.9.17** refers to **Separation Distances (Apartments)** – the proposed apartment blocks and scheme as a whole has been designed in accordance with adopted Section 28 Guidelines and local policy.

**Section 15.9.18** refers to **Overlooking and Overbearing** – The development has been carefully designed to complement the adjacent permitted residential development and to minimise any potential overlooking or overbearing impacts of the adjacent properties. This is particularly true of the proposed development which takes cognisance of the permitted 7 storey height of Santry Place.

**Section 15.14.6** refers to **Medical and Related Uses**– the development includes the provision of a



designated medical suite / GP Practice unit on the ground floor of Block B.

**Section 15.14.7.1** refers to **Retail and Retail Services** – the development provides 4 no. retail / commercial units (located on the ground floors of Blocks A, B & D)

**Section 15.17.2** refers to **Public Lighting** – A Public Lighting Layout and associated analysis report is enclosed as part of the application and provides for further details

**Section 15.17.4** refers to **Shopfront and Façade Design** – The proposed 4 no. retail / commercial units tenants will comply with the requirements of Section 15.17.4.

**Section 15.18** refers to **Environmental Management** – the application submitted encloses details of Construction Management Plans, details of Phasing, Waste Management details, Recycling Facilities, Basements, Plant Machinery and Floor Risk Management. Please refer to the enclosed Planning Statement and pack as a whole for full details of compliance on each.

### **Evaluation of Consistency with the 2022-2028 Draft Dublin City Development Plan**

Overall, it is considered that the proposed development is in accordance with the policies and standards of the Draft Plan. The proposed development provides for a mixed use development on Z3 zoned land. The proposed dwellings will increase the housing stock in the area and have been designed to a high-quality standard.

### **3.0 Conclusion**

This Statement of Compliance demonstrates the compliance of the proposed development with the Draft Dublin City Development Plan 2022-2028, as per the Draft Plan that was placed on public display from 25<sup>th</sup> November 2021 and 14<sup>th</sup> of February 2022.

Where the proposed development does not fully comply with the requirements of the Development Plan and/or Local Area Plan, these instances are highlighted and addressed in the submitted Material Contravention Statement.

We are therefore, of the opinion that the proposed development will provide an appropriate form of high quality residential development for the subject lands which have been zoned for Z3 and remain proposed to be zoned objective Z3 under the Draft Plan, and will provide for an efficient use of lands which are highly accessible and well served by public transport.

In conclusion, it is submitted that the proposed development is consistent with the proper planning and sustainable development of the area.