



**ARMSTRONG
FENTON**
ASSOCIATES

PROJECT: SANTRY AVENUE STRATEGIC HOUSING DEVELOPMENT

REPORT: STATEMENT OF CONSISTENCY

CLIENT: DWYER NOLAN DEVELOPMENTS LTD.

DATE: 20 | 06 | 22

**Planning &
Development
Consultants**



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1.0. Introduction

1.1. Purpose of Report

- 1.1.1. This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning & Development Consultants, on behalf of Dwyer Nolan Developments Ltd. (the applicant) to accompany the application for Strategic Housing Development submitted to An Bord Pleanála in respect of a site measuring c. 1.5 hectares located at the junction of Santry Avenue & Swords Road, Santry, Dublin 9.
- 1.1.2. Section 8(1)(a)(iv)(I) of the Planning and Development (Housing) and Residential Tenancies Act 2016 directs an applicant for strategic housing development to submit a statement setting out how a development proposal will be consistent with the objectives of the relevant development plan and/or local area plan. In accordance with same, this Statement of Consistency (hereafter 'statement') is put forward to demonstrate that the proposed development is consistent with the relevant national, regional, and local planning policy, and therefore ought to be granted permission.
- 1.1.3. The application for strategic housing development is also accompanied by a comprehensive range of documentation, including for, inter alia: Planning Report, Social & Community Infrastructure Assessment, Material Contravention Statement, and an Environmental Impact Assessment Report (EIAR). These documents are enclosed with the application as separate standalone documents and should be read in conjunction with this statement, together with the drawings and technical reports listed in the cover letter which accompanies the application.

1.2. Structure of Report

1.2.1. The statement is structured as follows:

- Section 2 provides an overview of the proposed development:
- Section 3 details the proposed development's consistency with national planning policy:
- Section 4 details the proposed development's consistency with Section 28 Ministerial Guidelines:
- Section 5 details the proposed development's consistency with regional planning policy:
- Section 6 details the proposed development's consistency with local planning policy:
- Section 7 provides for overall conclusions to the statement.

1.3. Documents Considered

1.3.1. The statement considers the following policy documents:

National Planning Context

- The National Planning Framework (2018):
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016):

Section 28 Ministerial Guidelines

- Urban Development and Building Heights Guidelines for Planning Authorities (2018):
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020):



- Guidelines for Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual - A Best Practice Guide (2009):
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007):
- Childcare Facilities: Guidelines for Planning Authorities (2001):
- Design Manual for Urban Roads and Streets (2013, as amended):
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009):
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009 as amended):
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018):

Regional Planning Context

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (2019):
- The Transport Strategy for the Greater Dublin Area 2016-2035:

Local Planning Context

- Dublin City Development Plan 2016-2022.
- Draft Dublin City Development Plan 2022-2028



2.0. Development Overview

2.1. Site Context

- 2.1.1.** The application site is located in Santry, Dublin 9, approximately 6km to the north of Dublin city centre. Santry represents a dispersed and established suburb of north Dublin which straddles the boundaries of Dublin City Council and Fingal County Council; however, the application lies entirely within the Dublin City Council administrative area.
- 2.1.2.** Specifically, the proposed strategic housing development is located at the junction of Santry Avenue & Swords Road. The site is bounded to the north by Santry Avenue, to the east by Swords Road, and to the west by Santry Avenue Industrial Estate. To the south, the site abuts the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19). This permitted development includes for a total of 205 no. apartments, 3 no. retail units, a creche, community / office floor space, in 5 no. 4 to 7 storey blocks. This development is being constructed by the applicant and is currently nearing completion. The subject development has been designed with careful consideration to the design and setting of Santry Place to create spatial and visual integration between the permitted and proposed developments.
- 2.1.3.** The site measures c. 1.5 hectares and is currently occupied by Chadwicks Builders Merchants (formerly Heiton Buckley Builders Merchants) in a large industrial type building with an associated yard and car parking. The site is roughly square in shape and is generally level with the road but raises slightly at the southern end.
- 2.1.4.** The existing boundary to the Swords Road comprises a steel fence and mature hedging, while the boundary at Santry Avenue consists of a low wall with a steel fence on top. Existing vehicular access to the site is from Santry Avenue to the north. The site is currently fenced off from Santry Place and the existing access to same from the Swords Road; however, the proposed development will see integration between permitted and proposed developments in this regard.
- 2.1.5.** The application site is zoned "Z3" (Neighbourhood Centres) in the existing Dublin City Development Plan 2016-2022 ('CDP') with the objective "*To provide for and improve neighbourhood facilities.*" Residential use is listed as a 'permissible use' under the Z3 zoning, together with, inter alia: childcare facilities, community facilities, cultural / recreational uses, medical use and related consultants, office use (max 300sq.m), open space, primary health care centres, restaurants and shops (neighbourhood). In compliance with the CDP's vision for Z3 lands, the proposed development includes for commercial, community, and residential amenity, uses at ground floor level, with high density residential development alongside and above.



Figure 1 - Subject Site in Context.

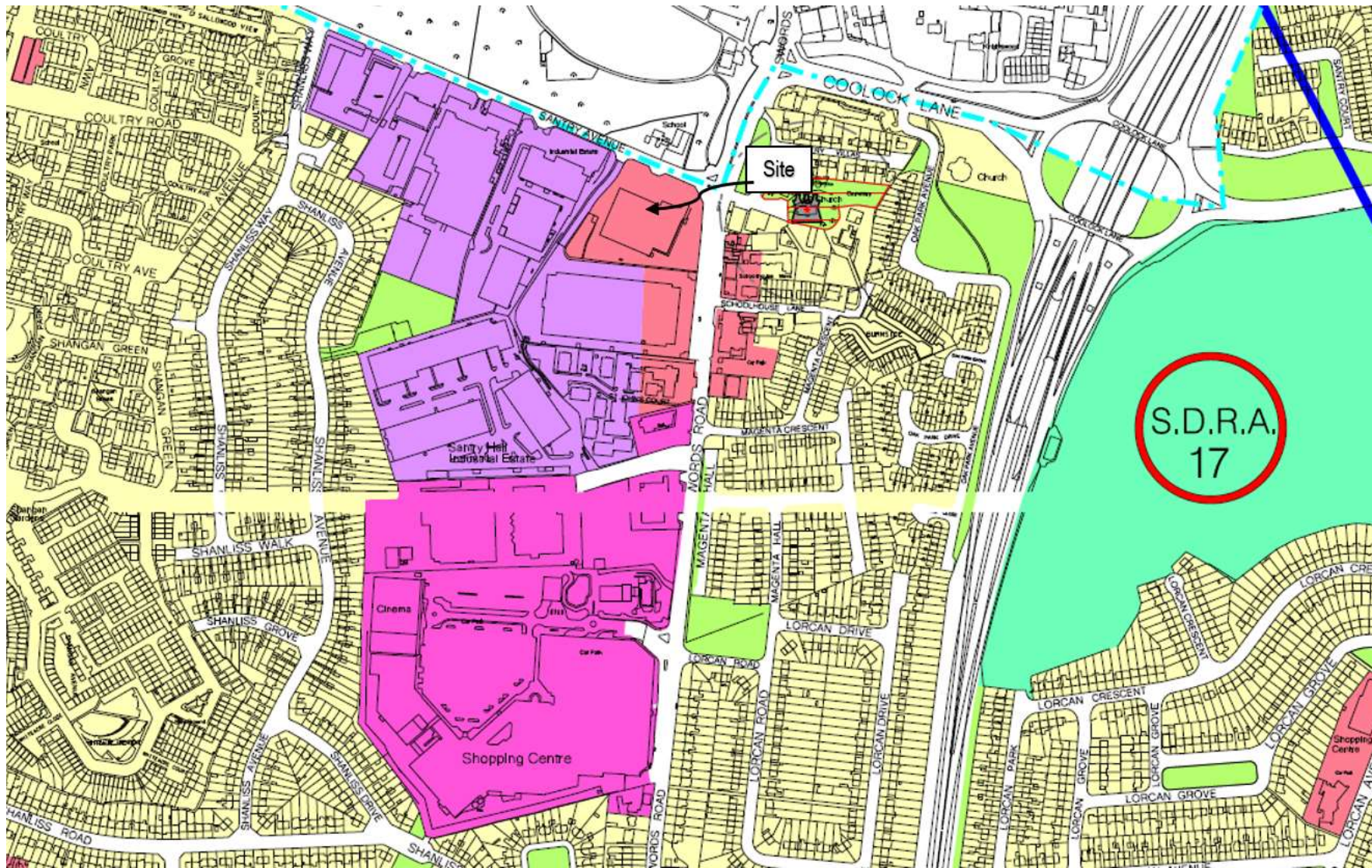


Figure 2 - Subject Site Zoning (Extract of Zoning Map B of the existing CDP).



2.2. Proposed Development

2.2.1. In summary, the proposed development provides for residential, commercial / retail, community, and residential amenity, uses on a site measuring c. 1.5 hectares located at the junction of Swords Road and Santry Avenue, Santry, Dublin 9.

2.2.2. The proposed development includes for the demolition of the existing industrial type building on the site (i.e. the Chadwicks Builders Merchants) and, in its place, will see the construction of 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), ranging from 7 no. storeys to 14 no. storeys in height, over a basement level car park.

2.2.3. The residential element of the development consists of 350 no. apartments comprised of the following mix of dwellings:

- 113 no. 1 bed dwellings
- 218 no. 2 bed dwellings
- 19 no. 3 bed dwellings

Table 1 details a breakdown of the proposed residential mix:

Block	Total No. of Dwellings	No. of 1 beds	No. of 2 beds	No. of 3 beds	Total Residential Floor Area (sq.m)
Block A	59	26	27	6	4,002.2
Block B	38	6	26	6	3,150.6
Block C	55	13	42	N/A	4,088.5
Block D	51	25	19	7	3,700
Block E	58	10	48	N/A	4,228
Block F	55	13	42	N/A	4,068.2
Block G	34	20	14	N/A	2,113.1
Total	350	113	218	19	25,350.6

Table 1 - Proposed Residential Mix.

2.1. The proposed development also provides for 4 no. commercial / retail units and a medical suite / GP Practice unit located on the ground floor of Blocks A, B, and D, a community use unit located on the ground floor of Block E, and a 1 storey residential amenity use unit located between Blocks A and D. All these proposed non-residential uses face onto Santry Avenue and Swords Road to cater for active frontage at an important corner location. Table 2 provide for a breakdown of the proposed non-residential uses.



Block	Other Uses	Floor Area (m ²)	Total Floor Area (m ²)
Block A	Commercial Unit B	132.4	305.4
	Commercial Unit C	173	
Block B	Commercial Unit D	162.3	292.7
	Unit E – Medical Suite / GP Practice	130.4	
Block C	N/A	N/A	0
Block D	Commercial Unit A	163.3	163.3
Block E	Community Use	188.1	188.1
Block F	N/A	N/A	0
Block G	N/A	N/A	0
Between Blocks A & D	Residential Amenity Use	187.9	187.9
Total	N/A	1,137.4	1,137.4

Table 2 - Proposed Non-Residential Uses.

- 2.2.4.** The development includes for a basement level car park (c. 5,471sq.m) comprised of 173 no. car parking spaces (including for 12 no. disabled parking spaces) & 719 no. bicycle parking spaces. The basement level is internally accessible from cores of Blocks A, B, C, D, E, & F, while vehicular access to the basement is from the south between Blocks B & C. An additional 36 no. car parking spaces & 58 no. bicycle parking spaces (including 42 no. visitor spaces) are also provided for, within the site boundaries, at surface level. Blocks F & G cater for internal bicycle storage areas at ground floor level.
- 2.2.5.** Public open space of c. 1,915sq.m is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122sq.m provided for as follows: (i) between Blocks E, F, & G (ii) between Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F, and on the proposed residential amenity use unit. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels. The development includes for hard and soft landscaping & boundary treatments, which will clearly define public, private, and communal open spaces.
- 2.2.6.** Vehicular access to the development will be via 2 no. existing / permitted access points as follows: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Dublin City Council Ref. 2713/17).
- 2.2.7.** The site is currently in private use by Chadwicks Builders Merchants and, therefore, the proposed development will not result in any loss or reduction of existing public open space, residential dwellings, or community related facilities. It is considered that the development, comprising a mix of uses, represents sustainable planning of the lands available, in compliance with the zoning objective attached to the site, which will benefit both existing and future residents of Santry.



2.3. Development Description

2.3.1. The application for strategic housing development is detailed in full below, as per the public notices:

Dwyer Nolan Developments Ltd. intend to apply to An Bord Pleanála for permission for a strategic housing development, on a site of c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19).

The proposed development provides for 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 4 no. retail / commercial units, a medical suite / GP Practice units and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.

The development consists of the following:

- (1) Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).
- (2) Construction of 350 no. 1, 2, & 3 bed apartments, retail / commercial and community uses in 4 no. buildings that are subdivided into Blocks A-G as follows:
 - Block A is a 7 to 14 storey block consisting of 59 no. apartments comprised of 26 no. 1 bed, 27 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. commercial/retail units located on the ground floor (c. 132.4m² & 173m² respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. commercial/retail units and 1 no. medical suite / GP Practice unit located on the ground floor (c. 162.3m² & 130.4m² respectively). Refuse storage areas are also provided for at ground floor level.
 - Block C is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. Refuse storage areas are provided for at ground floor level. Adjoining same is Block D which is a 7 to 10 storey block consisting of 51 no. apartments comprised of 25 no. 1 bed, 19 no. 2 bed, & 7 no. 3 bed dwellings, with 1 no. commercial unit / café located on the ground floor (c. 163.3m²). A refuse storage area is also provided for at ground floor level.
 - Block E is a 7 to 10 storey block consisting of 58 no. apartments comprised of 10 no. 1 bed & 48 no. 2 bed dwellings, with 1 no. community use unit located on the ground floor (c. 188.1m²). A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
 - Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.



- (3) Construction of a 1 storey residential amenity unit (c. 187.9m²) located between Blocks A & D.
- (4) Construction of basement level car parking (c.5,470.8m²) accommodating 173 no. car parking spaces & 719 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 36 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
- (5) Public open space of c. 1,915m² is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122m² provided for between (i) Blocks E, F, & G, (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
- (6) Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
- (7) The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

The application contains a statement setting out how the proposal is consistent with the objectives of the Dublin City Development Plan 2016-2022, and also contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

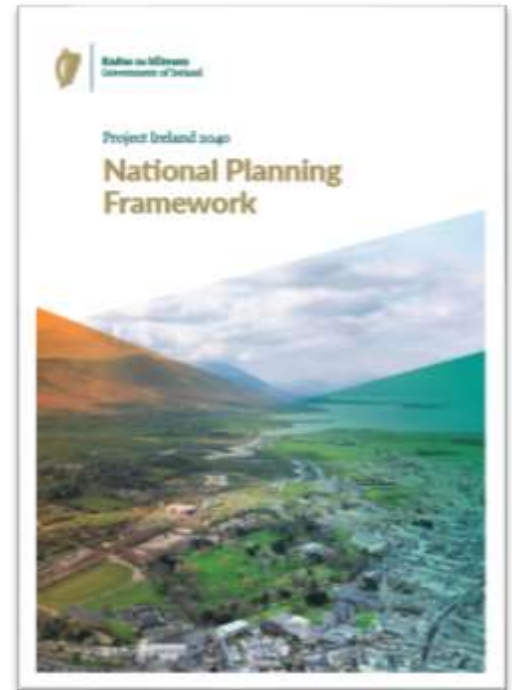
An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the development proposal and accompanies the application. The application, together with the Environmental Impact Assessment Report, may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dublin City Council. The application may also be inspected online at the following website set up by the applicant: www.santryavenueshd2.ie.

3.0. Statement of Consistency with National Policy

3.0.1. This section details the proposed development's compliance with relevant national planning policy, namely: The National Planning Framework (2018) and Rebuilding Ireland: Action Plan for Housing and Homelessness (2016).

3.1. Project Ireland 2040 - National Planning

3.1.1. The National Planning Framework (hereafter 'NPF') is the Government's high-level strategic plan for shaping the future growth and development of the country to cater for a projected population increase of c. one million people up to the year 2040. The NPF is accompanied by the National Development Plan, a 10 year capital investment strategy, and together they are known as Project Ireland 2040.



3.1.2. A core element of the NPF's strategy is to deliver compact growth with the key features being as follows:

- *Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.*
- *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.*
- *Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.*

3.1.3. The NPF provides a framework for future development expressed through 10 no. National Strategic Outcomes as detailed in Figure 3 below. To achieve these National Strategic Outcomes each chapter of the NPF contains National Policy Objectives which promote coordinated spatial planning, sustainable use of resources, and protection of the environment.



Figure 3 - National Strategic Outcomes of the NPF.

3.1.4. The 2016 Census states the population of Dublin City as being c. 554,554 persons. The average household occupancy rate in Dublin City was 2.48 persons per dwelling in 2016 which compares to a State average of 2.75 persons per dwelling. The NPF notes that the average household occupancy rate in the State is expected to decline to around 2.5 persons by 2040, which will have impacts on the types of housing required to meet demand.

3.1.5. National Policy Objective 8 of the NPF seeks to: *“ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.”* With reference to same, Table 4.1. of the NPF details the 2016 population of Dublin City and Suburbs as being 1,173,000 persons, with a targeted population growth between 235,000-293,000 persons to the year 2040, giving a minimum population target of 1,408,000 within the life of the NPF.

3.1.6. The following National Policy Objectives are considered relevant:

- **National Policy Objective 1b** - *“Eastern and Midland Region: 490,000 - 540,000 additional people i.e. a population of around 2.85 million.”*
- **National Policy Objective 1c** - *“Eastern and Midland Region: around 320,000 additional people in employment i.e. 1.34 million in total.”*
- **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.”*

3.1.7. National Strategic Outcome 1 of the NPF states that carefully managing the sustainable growth of compact



cities, towns, and villages, will add value and create more attractive places in which people can live and work. Activating strategic areas to achieve effective density and consolidation is a key priority of the NPF. The following National Policy Objectives are considered relevant:

- **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.”*

3.1.8. Chapter 4 of the NPF focuses on the development of urban spaces and the need to create more attractive ‘liveable’ towns and villages. The following National Policy Objectives are considered relevant:

- **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 and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*
- **National Policy Objective 6** - *“Regenerate and rejuvenate cities, towns and villages of all types and 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** - *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*
- **National Policy Objective 13** - *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”*

3.1.9. Chapter 6 of the NPF focuses on enhancing the quality of life in Ireland’s cities, towns, and villages. The NPF acknowledges that it cannot effect change in all dimensions that contribute to quality of life; however, there are some key elements that it will directly impact on, most importantly ‘the natural and living environment’. The following National Policy Objectives are considered relevant:

- **National Policy Objective 27** - *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”*
- **National Policy Objective 28** - *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”*
- **National Policy Objective 32** - *“To target the delivery of 550,000 additional households to 2040.”*



- **National Policy Objective 33** - *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*
- **National Policy Objective 34** - *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.”*
- **National Policy Objective 35** - *“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.”*

3.1.10. Chapters 9 & 11 of the NPF focus on the need to provide for a sustainable environmental future and the requirement to assess the impact of new developments on the environment. The following National Policy Objectives are considered relevant:

- **National Policy Objective 52** - *“The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.”*
- **National Policy Objective 53** - *“Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.”*
- **National Policy Objective 54** - *“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”*
- **National Policy Objective 56** - *“Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.”*
- **National Policy Objective 57** - *“Enhance water quality and resource management by:*
 - *Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;*
 - *Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process;*
 - *Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), nonporous surfacing and green roofs, to create safe places.”*
- **National Policy Objective 60** - *“Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.”*
- **National Policy Objective 63** - *“Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.”*
- **National Policy Objective 64** - *“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to*



the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.”

- **National Policy Objective 65** - *“Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.”*
- **National Policy Objective 75** - *“Ensure 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.”*

3.1.11. Statement of Consistency with the NPF

- It is considered that the proposed development is wholly consistent with the National Strategic Outcomes and National Policy Objectives of the NPF.
- The proposed development supports National Strategic Outcome 1 ‘Compact Growth’ which seeks to make better use of *“under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.”* The development includes for 350 no. dwellings on a brownfield site, providing a density of c. 233 dwellings per hectare, located within the urban footprint of Dublin and adjacent to an existing public transport corridor (Swords Road QBC). The development also includes for ground floor level mixed-uses which will provide for employment opportunities on site.
- The NPF’s overall strategy seeks to better manage Dublin’s growth to ensure that more of it can be accommodated within, and close to, the city, thereby reserving the the trend towards overspill into surrounding counties. The development is situated at an important, underutilised & zoned, corner location on an established entrance route into Dublin city. The site is well served by public transport, being adjacent to the existing Swords Road QBC and the proposed BusConnects Corridor on same. The site is also easily accessible to the M50 / M1 motorways and Dublin Airport. It is therefore considered that the development, by virtue of its location, proposed density and building heights, supports National Policy Objectives 1b, 2a, 3a, 3b, 5, 6, 8 & 32 of the NPF.
- The development supports the population targets for both Dublin and the Eastern & Midland Region contained in the NPF. The development will deliver much needed housing on zoned lands at an appropriate scale and density in an existing built up area. The NPF seeks to address existing shortages in housing in key urban areas by increasing the quantum of apartments in the State to be more in line with European averages. The NPF notes that 80% of all households in Dublin city are made up of 3 persons or less. The development, through its design, density, and proposed residential mix, supports the targets of the NPF to increase apartment supply in existing urban areas well served by public transport.
- With specific regard to ‘Dublin City and Metropolitan Area’, the NPF states that Dublin needs to *“accommodate a greater proportion of the growth it generates within its metropolitan boundaries”* by requiring a *“focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.”* The development supports these national targets for the growth of Dublin. The development is located within the M50 ring and caters for the regeneration / redevelopment of an industrial type setting which currently does not represent efficient use. The development puts forward increased density and building heights which are appropriate to the site given the design and the contextual location of the development.



- The NPF details that key future growth enablers for Dublin include for, inter alia:
 - *“Identifying a number of ambitious largescale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area”*
 - *“Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally”*
 - *“Enabling enhanced opportunities for existing communities as development and diversification occurs, particularly through employment, learning and education support”*

The development supports these growth enabling targets for Dublin through its location, scale, density, proposed mix of uses, and regeneration of a less intensive site situated within the M50 ring.

- In compliance with the Z3 zoning attached to the site, the development caters for non-residential uses at ground floor level, including for community, retail / commercial, and residential amenity, uses. The development therefore supports National Policy Objectives 1c, 2a & 6 of the NPF.
- The development provides for new homes at a sustainable location with strategic access to existing employment and services. The development offers an appropriate mix of housing typologies to support the sustained trend for smaller households and the need for lifetime adaptable homes. All the proposed dwellings are designed in compliance with the standards of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018, as amended). The proposed materials and finishes are of a high quality and will create a unique quality urban place. It is considered that the development provides for the creation of an attractive, high quality, sustainable new mixed-use development within the existing urban environs of Dublin. The development therefore supports National Policy Objectives 4, 28, 33 & 34 of the NPF.
- The development provides for high density residential development in an existing built up area, with retail / commercial, community, and residential amenity, uses located at ground floor level. The development is therefore considered to be strengthening the vitality of the Santry area, encouraging more people, jobs, and activity, within an existing urban area and supporting National Policy Objective 11 of the NPF.
- The development has been designed to support sustainable transportation modes and permeability, seeks to reduce the provision of car parking, and increase building heights at a suitable corner location adjacent to existing public transportation. The development therefore supports National Policy Objectives 13 & 27 of the NPF.
- National Policy Objective 35 of the NPF states the need 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”*. The NPF also states the need *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”*. The subject site is located at one of the main entrance routes into Dublin City and is well served by public transport. The existing site is currently underutilised given its prominent location with the existing urban footprint of Dublin. The development caters for building heights of 7 no. to 14 no. storeys and a gross / net density of c. 233 dwelling per hectare. The development is therefore considered in accordance with the objectives of the NPF in this regard.
- The development has been subject to a comprehensive Environmental Impact Assessment, including for an Appropriate Assessment Screening and a Site Specific Flood Risk Assessment, and mitigation measures are put in place, where necessary, to ensure protection of the environment and sustainable

development. The development therefore supports National Policy Objectives 52, 53, 54, 56, 57, 63, 64, 65 & 75 of the NPF.

- In accordance with the National Policy Objectives of the NPF, the development will deliver an efficient density of development, comprised of modern new homes within an existing urban area, and meets the objective of providing new homes at locations that can support sustainable development and at an appropriate scale of provision relative to the location.

3.2. Rebuilding Ireland – Action Plan for Housing and Homelessness

3.2.1. Rebuilding Ireland is the Government’s Action Plan for Housing and Homelessness. The overarching aim of the Action Plan is to increase the delivery of housing, from its current undersupply across all tenures, to help individuals and families meet their housing needs.

3.2.2. The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that:

“locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision.”



3.2.3. The Action Plan is structured on five key pillars, with Pillars 2, 3, & 4 considered most relevant:

- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector

3.2.4. Statement of Consistency with Rebuilding Ireland

- The development provides for 350 no. dwellings comprised of 1, 2, & 3 bed apartments, with 35 no. of the total no. of dwellings proposed to be delivered to Dublin City Council as social housing, representing 10% of the total no. of proposed dwellings in compliance with the provision of Part V of the Planning & Development Act 2000 (as amended). The proposed social housing units are located in Block F and cater for 35 no. 1 & 2 bed dwellings which are considered to be appropriate to the social housing requirements of Dublin City Council. The applicant has held talks with the Housing Section of Dublin City Council and a final agreement on Part V units will be made subsequent to the receipt of a grant of permission should one be forthcoming. The development is considered to fully support Pillar 2 of the Rebuilding Ireland Action Plan.
- The development provides for 350 no. new residential dwellings on underutilised and zoned lands located within the existing urban footprint of Dublin City. The subject site is located at an important corner location on an established entrance route into the city, adjacent to the Swords Road QBC, and easily accessible to the M50 / M1 motorways. The development will substantially add to the residential accommodation available in Santry and therefore help address the increasing housing demands in Dublin. The development is also put forward at a scale and density which is appropriate to the locational



context of the site. The development is considered to fully support Pillar 3 of the Rebuilding Ireland Action Plan.

- The development will cater for both homes to purchase and homes for the rental sector. The proposed dwellings have been designed to meet the most up to date standards for residential accommodation i.e. the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018, as amended). The development is considered to support Pillar 4 of the Rebuilding Ireland Action Plan.

4.0. Statement of Consistency with Section 28 Ministerial Guidelines

4.0.1. This section details the proposed development’s compliance with relevant Section 28 Ministerial Guidelines, namely the following:

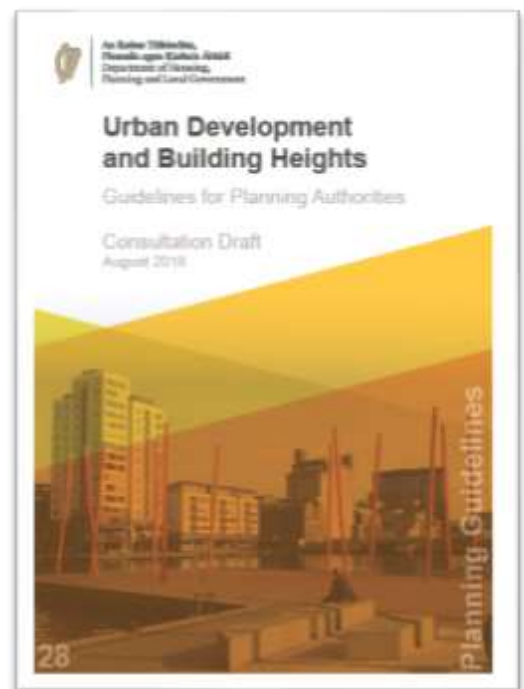
- Urban Development and Building Heights Guidelines for Planning Authorities (2018):
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018, as amended):
- Guidelines for Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual – A Best Practice Guide (2009):
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007):
- Childcare Facilities: Guidelines for Planning Authorities (2001):
- Design Manual for Urban Roads and Streets (2013, as amended):
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009):
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009 as amended):
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018):

4.1. Urban Development and Building Heights Guidelines for Planning Authorities (2018)

4.1.1. The 2018 Urban Development and Building Heights Guidelines (hereafter ‘UD&BHG’) carry forward the National Policy Objectives of the NPF and the Regional Policy Objectives of the Eastern & Midland Regional Spatial and Economic Strategy (hereafter E&MRSES). In summary, the UD&BHG seek to reinforce the need to consolidate and strengthen existing built-up areas, move away from blanket limitations on building height, increase densities within existing urban areas, and promote increased building height in locations with good public transport services.

4.1.2. The UD&BHG clearly state, 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 city and town cores and in other urban locations with good public transport accessibility.**

4.1.3. The UD&BHG also clearly state that Planning Authorities and An Bord Pleanála **are required to have regard to, and apply, any specific planning policy requirements (SPPRs) of the guidelines, in carrying out their functions, and that SPPRs stated in the UD&BHG take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.** In this regard, Section 9(3) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 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.

(c) In this subsection “specific planning policy requirements” means such policy requirements identified in guidelines issued by the Minister to support the consistent application of Government or national policy and principles by planning authorities, including the Board, in securing overall proper planning and sustainable development.”

The UD&BHG emphasise that the achievement of the NPF Objectives and Outcomes requires increased density, scale, and heights in town and city cores.

4.1.4. In relation to redevelopment and enhancement of the city core, the UD&BHG state:

“to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation term on reusing previously developed “brownfield” land, building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements”.

Significant emphasis is also placed on promoting development within the existing urban footprints and utilising existing sustainable mobility corridors and networks:

“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks”.

4.1.5. The UD&BHG further state that: *“the preparation of development plans, local area plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.*

4.1.6. Statement of Consistency with the UD&BHG

4.1.7. The existing Dublin City Development Plan 2016-2022 (CDP) conflicts with the policies and objectives of the UD&BHG with regard to building heights as the existing CDP maintains a blanket limitation on building height within the Dublin City Council administrative area. It is notable that the existing CDP came into force prior to the publication of the UD&BHG. The proposed development caters for building heights of 7 no. storeys (c. 22.9m) to 14 no. storeys (c.48.3m). It is considered that the proposed building heights are appropriate and fully justified in the context of the SPPRs of the UD&BHG, which An Bord Pleanála must have regard to in carrying out their functions. Again, it is noted that SPPRs of the UD&BHG **take precedence over any conflicting policies and objectives of the development plan.** The SPPRs of the UD&BHG, and the proposed development’s compliance with same, are detailed in the following sub-sections.

4.1.8. The UD&BHG contain 4 no. SPPRs with SPPR 1 being as follows:

SPPR 1

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

Figure 4 – SPPR 1 of the UD&BHG.

Development Compliance with SPPR 1: In accordance with SPPR 1, the proposed development is located on a prominent junction, between Santry Avenue and Swords Road, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. It should also be noted that the subject site is easily accessibility to the M50 / M1 motorways and within 400 metres of a large regional park (Santry Demesne Park).

The proposed development will regenerate / redevelop an underutilised brownfield site, in compliance with the Z3 land use zoning attached to the site. The proposed development is therefore considered to represent an ideal opportunity to provide for increased building heights and densities in order to achieve the objectives of the NPF. Having regard to the foregoing, the proposed development is considered to be fully compliant with SPPR 1 of the UD&BHG and the proposed building heights are justified in this context.

4.1.9. SPPR 2 of the UD&BHG is as follows:

SPPR 2

In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans² could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.

Figure 5 - SPPR 2 of the UD&BHG..

Development Compliance with SPPR 2: The subject site is zoned Z3 (Neighbourhood Centres) in the existing Dublin City Development Plan 2016-2022 (hereafter CDP). Permissible uses for the Z3 zoning include for, inter alia: residential, community facilities, cultural/ recreational building and uses, enterprise centre, medical and related consultants, office (max 300sq. m), open space, primary health, care centre, restaurant, shop (neighbourhood). The CDP's vision for Z3 lands seeks to develop such lands for the provision of local facilities, accessible via walking, with a limited range of services. It is stated in the CDP that Z3 lands: *"may include an element of housing, particularly at higher densities, and above ground floor level."*

The proposed development consists of a mixed use scheme comprising 350 no. residential apartments, with non-residential uses located at ground floor level. The proposed non-residential uses comprise of 4 no. retail / commercial units, a medical suite / GP Practice unit, a community unit, and a residential amenity use unit. It is therefore considered that the proposed development caters for an appropriate mix of uses, in compliance with SPPR 2 of the UD&BHG, which will enable redevelopment of the subject site to comprehensively meet contemporary social and economic needs. All the proposed non-residential uses are located at ground floor level, fronting onto both Swords Road and Santry Avenue, in order to promote activity and bring a new vibrancy to the area. In compliance with the Z3 zoning, high density residential development is located alongside and above these non-residential uses.

Having regard to the above, the proposed development is considered to be fully compliant with SPPR 2 of the UD&BHG and the proposed building heights are justified in this context.

4.1.10. SPPR 3 of the UD&BHG is as follows:

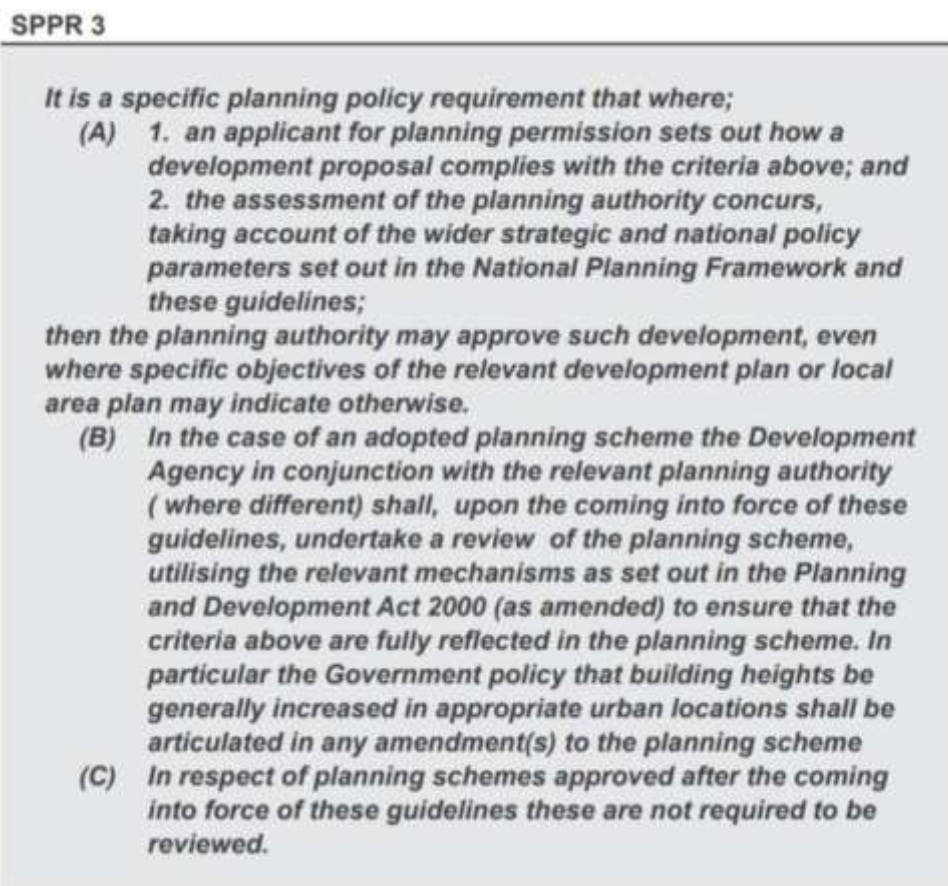


Figure 6 - SPPR 3 of the UD&BHG..



Development Compliance with SPPR 3: The criteria referenced in part (A) SPPR 3 refers to an assessment at 3 no. scales, being:

- At the scale of the relevant city/town:
- At the scale of district/ neighbourhood/ street:
- At the scale of the site/building:

It is noted that specific assessments may also be required at some or all the above scales to support proposals at some or all of these scales.

Sections 4.1.11 - 4.1.14 below detail the proposed development's compliance with the aforementioned criteria.

4.1.11. Scale of the Relevant City/ Town

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

The subject site is located on a prominent junction, between Santry Avenue and Swords Road, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. Dublin Bus operates a frequent service c. every 10 minutes at peak hours. Existing bus stops are also located on Santry Avenue, as well as Swords Road. The subject site is also easily accessibility to the M50/M1 motorways, providing wider connectivity to other public transport options in the city. The site is considered to be very well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and therefore compliant with the above criteria.

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

The proposed development has been designed with careful consideration to the surrounding environs of the site. The tallest element of the scheme (14 storeys - Block A) is located at the corner of the junction, giving a landmark element to the development at this prominent corner location. To the west of Block A, Blocks D & E, as they front onto Santry Avenue, provide for 10 storeys giving strong frontage and definition to the Santry Avenue streetscape, both complimenting and contrasting with the large regional park on the opposite side of the road (Santry Demesne). The locational context of Blocks A, D, & E, adjacent to existing roads and open space, create an ideal opportunity for increased heights which will not be detrimental any existing residential amenity in the vicinity.

To the rear, Blocks B, C, & F cater for 7 storeys. Blocks B, C, & F are aligned with the permitted 7 storey blocks of the Santry Place development to the south. The proposed setting and heights of Blocks B, C, & F, together with the setting of the proposed public and communal space within the development, provide for full integration between adjoining permitted and proposed developments, allowing for an new, integrated, urban quarter to be developed the junction of Swords Road and Santry Avenue.

To the south-west of the site, the proposed 7 storey height of Block G appropriately addresses the corner of the site and caters for efficient and appropriate use without any detriment to existing residential amenity given the existing uses located to the immediate west/ south-west.



At ground floor level, the proposed development provides for 4 no. retail / commercial units, a medical suite / GP Practice unit, a community use unit, and a residential amenity use. These non-residential uses front onto Swords Road and Santry Avenue, allowing for activity to be promoted along these streetscapes, and are put forward in compliance with the Z3 zoning attached to the site.

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Dermot Foley Landscape Architects and is submitted as part Environmental Impact Assessment Report which accompanies the application – please refer to same for full details. The LVIA considers that the proposed development will make a significant and positive contribution to the new emerging townscape of wider area and the future context of the surrounding lands. It the LVIA also considers the proposed network of open spaces will make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities of the area.

Furthermore, CGI's and verified views have been prepared by 3D Design Bureau and are also submitted with the application. The CGI's and verified views are considered to fully demonstrate that the proposed building heights will positively contribute to the area, appropriately addressing the corner location of the site, and protecting key views.

It is considered that the proposed development will make a positive contribution to the public realm / character of the area, improving to the existing scenario by transforming an underutilised brownfield site in private commercial use into a high quality, residentially led, mix-use development, which will improve the visual attractiveness of the area, and cater for a wider variety of uses. It is therefore considered that the proposed development is compliant with the above criteria.

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

The proposed development has been designed to address the existing streetscapes of both Swords Road and Santry Avenue. Activity is promoted at ground floor level of the blocks through the provision of retail / commercial uses, as well as community and residential amenity uses, fronting onto these surrounding roads, which will provide for community services and facilities thereby creating a sense of place and vibrancy.

The vehicular accesses to the development are put forward with cognisance to the already permitted vehicular accesses for the Santry Place development (granted under Dublin City Council Ref. 2713/17), with the internal road network being located to the west and south of the blocks in order to ensure that the development is not dominated by vehicles, which again aids the creation of a sense of place within the development.

The proposed layout has been carefully considered to allow for integration of proposed public and communal open spaces with the adjoining permitted public and communal open spaces for the Santry Place development to the south. The centrally located public open space for the development also allows for connectivity to Santry Demesne to the north of the site.

The proposed development provides for a variety in massing and height which addresses the contextual location of the site and its surrounding environs, placing the tallest element of the scheme at the junction of Swords Road and Santry Avenue, with strong urban form addressing the large Santry Demesne park to the north. To the rear, the heights of Blocks B ,C, F, & G correspond with the permitted 7 storey heights at Santry Place. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.



4.1.12. Scale of the District / Neighbourhood / Street

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

The proposed development caters for buildings which range in height from 7 no. storeys to 14 no. storeys. The range in building heights takes account of the surrounding environs of the site. The tallest element of the development (Block A) is put forward to address the corner setting of the site and provide for a landmark element to the proposed scheme. It is considered that the nature / size of the existing road junction, together with the large regional park to the immediate north (Santry Demesne) and the small area of open space to the north-east at Santry Villas, allows for the proposed 14 storey height of Block A to be easily accommodated without any detriment to existing amenity.

To the west of Block A, the 10 storey Blocks D & E create definition to the Santry Avenue streetscape and provide for a visually pleasant juxtaposition with Santry Demesne to the north. To the rear, 7 storey heights are catered for in Blocks B, C, F, & G to allow for integration with the permitted 7 storey Santry Place development to the south.

The proposed layout has carefully considered the location of proposed public and communal open spaces to allow for coherent development of the site through the integration of proposed public and communal open spaces with the permitted public and communal open spaces of Santry Place.

It is considered that the proposed development, through its layout, design and mix of uses, caters for a sense of place which will make a positive contribution to the existing urban neighbourhood and streetscape, and is therefore considered to be compliant with the above criteria.

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

The proposed development consists of 4 no. buildings, sub-divided into 7 no. blocks. The proposed layout has been informed by the nature of the existing streets surrounding the site and the layout of the permitted Santry Place development to the south. The proposed block layout allows for an ample provision of public and communal open space which will be aligned / integrated with the permitted public and communal open space of Santry Place, allowing for a greater sense of openness and space to be created between the blocks.

At ground floor level, 4 no. retail / commercial uses, a medical suite/ GP Practice unit and a community use unit are catered for in Blocks A, B, D & E, with a residential amenity use also located between Blocks A & D. These non-residential elements address the existing Santry Avenue and Swords Road streetscapes, bringing activity and vibrancy to the street, and avoiding long uninterrupted walls at street level. Private amenity spaces for the proposed apartments, in the form of terraces at ground floor level and balconies on the upper floors, also ensure activity and passive surveillance throughout the proposed scheme.

The proposed development caters for an appropriate range in building heights put forward in response to the surrounding environs, as previously detailed. The variation in the building heights provides for visual interest and avoids a monolithic visual appearance. The proposed materials and finishes are considered to ensure a high architectural standard is put forward, and are consistent with the surrounding developments and material pallet in the locality. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.



“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).”

It is considered that the proposed development enhances the urban design context for public spaces by catering for new public and communal open spaces in accordance with the required standards of the existing CDP and the relevant Section 28 Ministerial Guidelines. Public and communal open space, and indeed the proposed block layout, has been strategically designed to allow for integration with the permitted public and communal open spaces at Santry Place to the south, creating a greater sense of openness at an appropriate scale. The proposed centrally located public open space provision for the development allows for easy navigation to / from Santry Demesne to the north.

It is considered that the development further contributes to enhancing the overall character and quality of the public realm by catering for a more efficient use of the site subject and creating an animation at ground floor with generous setbacks from the roadway, to allow for the creation of an enhanced public realm.

The proposed development has been subject to a Site Specific Flood Risk Assessment in line with the requirements of *“The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).* The Site Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers and is enclosed with the application as a separate document – please refer to same for further details. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.

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

In its existing state, the subject site is in private use by Chadwicks Builders Merchants and is currently fenced off from the public, with the existing boundary to the Swords Road comprising a steel fence and mature hedging and the boundary to Santry Avenue consisting of a low wall with a steel fence on top.

It is considered that the proposed development will significantly enhance the existing public realm and street frontage by opening up to the site for new, residentially led, mix use development. The provision of ground floor active uses within the development caters for a strong urban design character and will bring a new vibrancy to both Swords Road and Santry Avenue. The development also significantly improves the pedestrian quality of these streetscapes and creates a more appropriate use by providing active retail /commercial uses at ground level with high quality residential accommodation on the upper levels.

The proposed blocks are arranging in a north-south orientation, allowing the development to fully integrate with the Santry Place development to the south, and for pedestrians / cyclists to easily navigate their way from Santry Demesne to the north through the proposed development and into Santry Place to the south. The proposed pedestrian routes through the site are considered to create new connections for the existing residents of the area which promote more sustainable modes of transport such as walking and cycling. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.

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

The proposed development provides for a mix of uses which include for 350 no. residential dwellings, 4 no. retails / commercial uses, a medical suite / GP Practice unit, a residential amenity use unit, and a community use unit. The proposed mix of uses is considered to be appropriate and compliant with the Z3 zoning attached to the site which seeks to cater for a variety of convenience type units at ground floor level, with high density



residential development above. It is considered that the development will significantly increase variety and choice in the area.

Paragraph 3.6 of the UD&BHG states that “*development should include an effective mix of 2, 3 and 4 storey development which integrates will into existing and historical neighbourhoods and **4 storeys or more** can be accommodated alongside existing larger buildings, trees and parkland, river/ sea frontage and along wider streets*”. (Our emphasis added).

The proposed development provides for a range of building heights adjacent to the Swords Road QBC and within walking distance to a large regional park (Santry Demesne). It is considered that the existing nature of the junction at Swords Road and Santry Avenue, which is of a large size, is more than capable of supporting taller buildings. In addition, immediately to the south of the subject site is the permitted 7 storey Santry Place development and it is therefore considered that the proposed development will integrate into its surroundings in an appropriate manner. The proposed development is therefore considered to be in accordance with the parameters for achieving 4 no. storeys or more in accordance with paragraph 3.6 above of the UD&BHG. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

4.1.13. Scale of Site / Building

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

A daylight / sunlight assessment for the proposed development has been prepared by Chris Shackleton Consulting and is submitted the application as a separate document – for further details please refer to same. The enclosed assessment addresses the availability, quality, and receipt of light within the development, including for access to adequate sunlight / daylight within the proposed public and communal open spaces. Initial designs of the proposed development were altered to appropriately accommodate required changes as recommended by initial feedback received from the daylight / sunlight assessment. It is considered that, given the surrounding context and orientation of the site, overshadowing and loss of light to existing residential amenity will be negligible. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

“Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.”

&

“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

A daylight / sunlight assessment has been prepared by Chris Shackleton Consulting and is submitted the application as a separate document – for further details please refer to same. The enclosed assessment considers that: “*Future occupants of the development will enjoy great levels of both daylight and sunlight within the proposed units and while having access to a number of amenity areas that are capable of receiving*



excellent levels of sunlight.....The results find that any impact on the sunlight received by individual apartments would be minimal in the overall context of the urban setting of the proposed development. There is a sufficient good quality of daylight in the apartments analysed and the amenity areas all have sufficient sunlight to be bright and pleasant spaces.” The assessment also includes for details of architect's compensatory measures / justification as required. These can be summarised as follows:

- The (over)provision and wide variety of communal amenity areas catered for within the scheme. which can be likened to a compensatory measure for certain apartments receiving below the BRE recommendations. All amenity spaces surpass the sun-lighting requirement by substantial margins.
- The design and large size of the private balconies which provide shelter and protection from the wind in addition to any sun lighting requirement. Recessed or partially recessed balconies ultimately contribute to a more user-friendly and comfortable private amenity space for residents.
- The quantum of apartments (98%) receiving above the required levels of daylighting and the analysis shows that all private spaces and living rooms also receive sunlight. There are no single north-facing single-aspect apartments.
- The floor to ceiling height of the ground floor units and the ground floor windows which are of a generous size above the minimum standards required

Chris Shackleton Consulting has been involved in the design process since the beginning of the project. A number of design changes were made throughout the design process to ensure that all of the proposed units and public / communal open spaces achieve acceptable level of daylight /sunlight. Please refer to the Daylight and Sunlight Analysis prepared by Chris Shackleton Consulting for further information on the results of the assessment. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.

4.1.14. Specific Assessments at Some or All of the Scales

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

A Bat Survey Report has been prepared by ASH Ecology & Environmental, for the proposed development and is enclosed with the application. The Bat Survey Report concludes that there is an absence of bat activity onsite and that the site itself is considered to be of lower importance for bats. It is therefore concluded that the overall impact on bats, arising from the proposed development, will be most likely negligible if the general recommendations and specific lighting mitigation measures are implemented. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.

“An assessment that the proposal maintains safe air navigation.”

As directed by An Bord Pleanála in their Notice of Pre-Application Consultation Opinion both the Irish Aviation Authority and the Dublin Airport Operator have been sent a copy of the application for their consideration. If a favourable decision is received from An Bord Pleanála the applicant will consult directly with the Irish Aviation Authority and / or the Dublin Airport Operator regarding the utilisation of cranes to ensure safe air navigation. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.

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

An Architectural Design Statement has been prepared by Davey & Smith Architects and is enclosed with the application as separate document – please refer to same for further details. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria.



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

The proposed development has been subject to an AA Screening prepared by Enviroguide Consulting. The AA screening concludes that upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, that, on the basis of objective information; the possibility **may be excluded** that the proposed development will have a significant effect on any of the European sites listed above. Enviroguide Consulting also concludes that *“these complete, precise and definitive findings, based on the best available scientific evidence, remove all reasonable scientific doubt that the Proposed Development will have any significant effect on the Natura 2000 sites detailed above. It is also noted that, no avoidance or preventative/mitigation measures have been taken into account in this Appropriate Assessment Screening Report and its conclusions. Accordingly, a Stage 2 Appropriate Assessment is not required to be carried out in relation to the Proposed Development”*.

The proposed development has also been subject to a comprehensive Environmental Impact Assessment Report (EIAR). The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application. Given all the foregoing, It is considered that the proposed development is compliant with the above criteria and therefore the proposed building heights are justified in this context.

4.1.15. SPPR 4 of the UD&BHG is as follows:

SPPR 4

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;***
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and***
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.***

Figure 7 - SPPR 4 of the UD&BHG.

4.1.16. The proposed development caters for 350 no. dwellings on a site measuring c. 1.5 hectares. The development therefore puts forward a proposed gross and net density of c. 233 dwellings per hectare.

4.1.17. In the context of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) the application site can be considered a ‘Brownfield’ or ‘Public transport corridor’ site. In relation

to brownfield sites, the guidelines state that higher densities should be promoted subject to appropriate safeguards, while in relation to public transport corridors the guidelines state that:

“In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors”.

The proposed development puts forward a proposed gross and net density of c. 233 dwellings per hectare and therefore secures the minimum densities required for such a site as detailed in aforementioned guidelines. The proposed development also secures an appropriate mix of building heights and avoids mono-type building typologies. It is therefore considered that the proposed development is compliant with SPPR 4 of the UD&BHG and that the proposed building heights are justified in this context.

4.1.18. Conclusion on UD&BHG

4.1.19. It is respectfully submitted that, given all the foregoing in Section 4.1 of this statement, the proposed development is fully compliant with all the SPPRs and stated criteria of the UD&BHG and therefore the proposed building heights of 7 no. to 14 no. storeys are fully justified in the context of the national and regional policy. As such, in light of the conflicting policies and objectives of the CDP in relation to building heights, and having regard to the development’s compliance with the SPPRs of the UD&BHG, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently development in compliance with the objectives of the NPF.

4.2. Sustainable Urban Housing: Design Standards for New Apartments (2018)

4.2.1. The 2018 (as amended) Sustainable Urban Housing: Design Standards for New Apartments Guidelines (hereafter Apartment Guidelines) were adopted in acknowledgement of the growing need to provide for long-term, sustainable, apartment accommodation in the State in order to meet shifting demographic demands and lifestyle choices. The Apartment Guidelines also support the objectives of the NPF, the E&MRSES, and the Rebuilding Ireland programme.

4.2.2. As with the UD&BHG, the Apartment Guidelines contain Specific Planning Policy Requirements (SPPRs) which **must be applied by Planning Authorities, or An Bord Pleanála, in the exercise of their functions and assessing development proposals. Where specific planning policy requirements are stated in the guidelines, they must take precedence over any conflicting policies or objectives of development plans or local area plans.**

4.2.3. The Apartment Guidelines contain 9 no. SPPRs which relate to, inter alia:

- Dwelling Mix
- Minimum Gross Floor Areas
- Dual Aspect Ratios
- Floor to Ceiling Heights
- Apartments to Stair/Lift Core Ratios





4.2.4. The Apartment Guidelines also provide for minimum standards and details in relation to car & bicycle parking, storage areas, private amenity spaces, communal open spaces, children's' play areas, internal room standards, internal room dimensions etc.

Statement of Consistency with the Sustainable Urban Housing: Design Standards for New Apartments

4.2.5. The proposed development is accompanied by a detailed Quality Housing Assessment, prepared by Armstrong Fenton Associates, which is submitted as a separate standalone document. The accompanying Quality Housing Assessment demonstrates the proposed development's compliance with relevant quantitative standards for new apartment developments detailed in the Apartment Guidelines. The application drawings, prepared by Davey & Smith Architects, also demonstrate that the proposed internal floor areas, rooms sizes, private amenity spaces etc. are in compliance with the standards of the Apartment Guidelines.

4.2.6. The Apartment Guidelines emphasise the importance of, and the need to appropriately develop, strategic sites in urban areas in close proximity to existing public transport facilities. The Apartment Guidelines identify locations in cities and towns that may be suitable for apartment development as follows:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/ or Less Accessible Urban Locations

Within this locational context, the subject site is considered to be a 'Central and/or Accessible Urban Location'. The Apartment Guidelines note that such locations are generally suitable for large scale apartment development and higher density developments. These locations are categorised as including the following:

- Sites within walking distances (i.e. up to 15 minutes or 1,000-1500m), of principle city centres or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (i.e. min 10-minute peak hour frequency) urban bus services.

The proposed development is located adjacent to the Swords Road QBC and the proposed BusConnects Corridor. Dublin Bus currently operate a high frequency service on this route (c. every 10 mins at peak hours). Existing bus stops are located in close proximity to the site on both Swords Road and Santry Avenue. The site is also easily accessible to the M50 / M1 motorways and Dublin Airport. It is clear that the site falls into the category of a 'Central and/or Accessible Urban Location' and is therefore suitable for the development of a high density apartment scheme.

4.2.7. The Apartment Guidelines also note that the scale and extent of new developments should increase where the site is strategically located near quality public transport hubs, services, and urban amenities:

"The scale and extent of apartment development should increase in the relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services also particularly suited to apartments."

In this regard it is notable that the proposed development is located in a well serviced built up urban area. The subject site is immediately south of Santry Demesne regional park which provides for a significant public amenity space. Santry Avenue Industrial Estate is located to the west, while St. John's Court Office Park and



Santry Hall Industrial Estate are located to south and southwest. There are a number of industrial based business uses operating around Dublin Airport to the north. Furthermore, the Omni Shopping Centre is located approximately 600 meters to the south of the subject site. The Omni Shopping Centre includes for c. 103 no. retail units (c. 45,000 sq.m total). All of these aforementioned areas provide for ample employment opportunities in the vicinity of the development site. It is therefore considered that the development is suitable for increased heights and increased densities in accordance with the objectives of the Apartment Guidelines.

4.2.8. In relation to Central and/or Accessible Urban Locations', the Apartment Guidelines state:

"the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances."

This directive of the Apartment Guidelines includes for site's *"within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services."*

The proposed development provides for 209 no. car parking spaces which results in a ratio of 0.6 spaces per dwelling, which is considered to be appropriate given the locational context of the application site and the availability of existing public transport options in the immediate vicinity.

4.2.9. A summary of the proposed development's compliance with SPPRs of the Apartment Guidelines is detailed in the following sub-sections.

4.2.10. SPPR 1 of the Apartment Guidelines states that development of new apartment schemes may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. The proposed development does not cater for any studio type units, and includes for 113 no. 1 bed dwellings representing c. 32% of the total number of proposed dwellings. The proposed development is therefore in compliance with SPPR 1 of the Apartment Guidelines.

4.2.11. SPPR 2 of the Apartment Guidelines states for new developments of 50 or more dwellings, SPPR 1 shall apply to the entire development. As stated above, the proposed development is compliant with SPPR 1 of the Apartment Guidelines and is therefore considered compliant with SPPR 2 of the Apartment Guidelines.

4.2.12. SPPR 3 of the Apartment Guidelines states the minimum floor areas for apartments, being: 37 sq.m for studios, 45 sq.m for 1 bed apartments, 63 sq.m for 2 bed / 3 person apartments, 73 sq.m for 2 bed / 4 person apartments & 90 sq.m for 3 bed apartments. All the proposed apartments meet with and/or exceed these minimum floor areas stated in the Apartment Guidelines, as detailed in the Quality Housing Assessment prepared by Armstrong Fenton Associates which accompanies the application as a separate document – please refer to same. The proposed development is compliant with SPPR 3 of the Apartment Guidelines.

4.2.13. SPPR 4 of the Apartment Guidelines has regard to dual aspect ratios, with the minimum number of dual aspect apartments being based on the location of a proposed development. To this end, the subject site is considered to be a *'more central and accessible urban location'* given that the site is located adjacent to existing high frequency public transport (the Swords Road QBC). SPPR 4 of the Apartment Guidelines states that it is a requirement to deliver at least 33% of proposed units as dual aspect units at such locations. Table 7 sets out the quantum and percentage of single and dual aspect units within the proposed development.



Block	Total No. of Units	No. of Single Aspect	% Single Aspect	No. of Dual Aspect	% Dual Aspect
A	59	13	22%	46	78%
B	38	20	53%	18	47%
C	55	34	62%	21	38%
D	51	20	39%	31	61%
E	58	36	62%	22	38%
F	55	34	62%	21	38%
G	34	7	21%	27	79%
Totals	350	164	47%	186	53%

Table 3– Proposed Residential Aspect.

It is evident from above that the proposed development is compliant with SPPR 4 of the Apartment Guidelines.

- 4.2.14.** SPPR 5 of the Apartment Guidelines states that ground level apartment floor to ceiling heights should be a minimum of 2.7m. As detailed on the drawings for each individual block, prepared by Davey & Smith Architects and enclosed with the application, the proposed development complies with SPPR 5 of the Apartment Guidelines.
- 4.2.15.** SPPR 6 of the Apartment Guidelines states that a maximum of 12 no. apartments per floor per core can be provided in new apartment schemes. The proposed development has a maximum of 8 no. apartments per floor per core, in Blocks C & F, and is therefore in compliance with SPPR 6 of the Apartment Guidelines.
- 4.2.16.** SPPRs 7, 8, & 9 of the Apartment Guidelines have regard to 'Built to Rent' and co-living / shared accommodation schemes. The subject development is for a conventional apartment scheme **i.e. it is not a 'Built to Rent' and/or co-living / shared accommodation scheme**, therefore SPPR's 7, 8, & 9 of the Apartment Guidelines do not apply to the proposed development.
- 4.2.17.** In addition to the above SPPRs, the Apartment Guidelines also set out directives in relation various other design recommendations and standards as detailed in the following sub-sections.

Private and Communal Open Space

- 4.2.18.** The Apartment Guidelines set out standards for private open space, with all of the proposed apartments provided with a quantum of private amenity space in accordance with the required standards detailed in Appendix 1 of the Apartment Guidelines i.e. 5 sq.m for 1 bed dwelling; 6 sq.m for 2 bed / 3 person dwellings, 7 sq.m for 2 bed / 4 person dwellings and 9 sq.m for 3 bed dwellings– for full details of same please refer to the Quality Housing Assessment prepared by Armstrong Fenton Associates which accompanies the application as a separate document. Private amenity spaces are provided for in the form of terraces at ground floor level and balconies on the upper floors.
- 4.2.19.** The Apartment Guidelines also set out standards for communal open space which is required as follows: 5 sq.m for 1 bed dwelling; 6 sq.m for 2 bed / 3 person dwellings, 7 sq.m for 2 bed / 4 person dwellings and 9 sq.m for 3 bed dwellings. Based on these standards the communal open space requirement for the development is 2,246 sq.m, as detailed in Table 4.



Proposed Dwelling Type	No. of Dwellings Proposed	Individual Communal Open Space Requirement (sq.m)	Total Communal Open Space Requirement (sq.m)
1 bed	113	5	565
2 bed / 3 person	16	6	96
2 bed / 4 person	202	7	1,414
3 bed	19	9	171
-	350	-	2,246

Table 4- Communal Open Space Requirements.

4.2.20. The proposed development caters for 3,122sq.m of communal open space, which is in excess of the 2,246sq.m required based on the proposed dwelling mix and the Apartment Guidelines standards. Communal open space is catered for 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. Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.

Children's Play

4.2.21. The Apartment Guidelines states the following in relation to children's play:

"Children's play needs around the apartment building should be catered for:

- *Within the private open space associated with individual apartments (see chapter 3);*
- *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 proposed development includes a children's play facilities as appropriate. The play strategy of the proposed development is detailed in the Landscape Design Rationale prepared by Dermot Foley Landscape Architects which accompanies the application – please refer to same for further details. 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. A schedule of play equipment is outlined as part of *Drawing No. 201 Landscape Plan*, prepared by Dermot Foley Landscape Architects and enclosed with in the application. Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.

Car Parking

4.2.22. The Apartment Guidelines note that *"quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria"*.

As previously established in Section 4.2.6 - 4.2.8. of this statement, the application site is considered to be a 'Central and/or Accessible Urban Location'. In relation to such locations, the Apartment Guidelines state the following:



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

- 4.2.23.** Given the contextual location of the application site, and with regard to the above guidance, the proposed development provides a reduced overall car parking standard when compared to the existing CDP standards (which themselves are a maximum standard). In the context of the Apartment Guidelines the proposed car parking provisions are considered to be wholly justified by the proximity of the proposed development to existing and proposed high quality public transport (bus) routes.
- 4.2.24.** In total, the proposed development caters for 209 no. car parking spaces provided for in the form of basement level parking and surface level parking. The basement includes for 173 no. car parking spaces. 36 no. residential and set down/visitors spaces also incorporating 6 no. mobility impaired and 3 no. car share (GoCar) spaces will be provided at surface level. Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.
- 4.2.25.** Please refer to the enclosed Traffic and Transport Assessment prepared by DBFL Consulting Engineers for full details.

Bicycle Parking

- 4.2.26.** *In total, the proposed development caters for 777 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within the proposed buildings.*
- 4.2.27.** Of the proposed bicycle parking provision, 719 no. bicycle parking spaces are catered for at basement level and a further 58 proposed as short term stay on surface level.
- 4.2.28.** The cycle provision also includes 9 no. Cargo parking spaces within basement. It is noted that the provision of cycle parking proposed within the development exceeds DCC standards and exceed the full DHPLG guideline for long term bicycle parking and is therefore considered adequate to accommodate residents' requirements and support / encourage modal shift away from private cars to a more sustainable travel by cycle.
- 4.2.29.** Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to same.

4.2.30. Conclusion on Apartment Guidelines

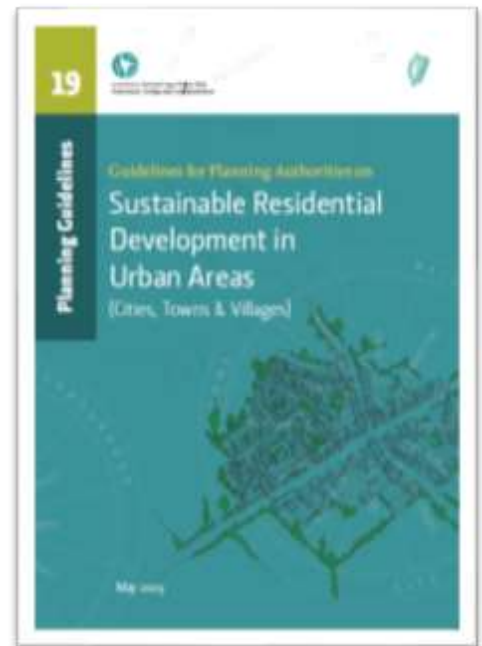
- 4.2.31.** It is respectfully submitted that, given all the foregoing in Section 4.2 of this statement, the proposed development is fully compliant with the SPPRs and stated criteria of the Apartment Guidelines. As such, in light of the conflicting policies and objectives of the CDP, and having regard to the development's compliance with the SPPRs of the Apartment Guidelines, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently development in compliance with the objectives of the NPF.

4.3. Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities and the accompanying Urban Design Manual (2009)

4.3.1. The Guidelines on Sustainable Residential Development in Urban Areas set out the core principles of urban design for creating sustainable places of high quality with distinct identities and sense of place. The Guidelines focus on the provision of layouts that:

- Minimise the car use and promote sustainable transport modes:
- Are universally accessible and legible for ease of movement:
- Efficiently use the lands available in terms of density and energy consumption:

The guidelines also set out recommended densities for development and detail how density should be measured.



4.3.2. The guidelines recommend that Planning Authorities promote high quality design in their policy documents and in their development management process. To this end, the guidelines are accompanied by the Urban Design Manual which illustrates how the policy principles can be translated into practice by developers and planning authorities when designing new residential schemes. The Urban Design Manual provides a series of criteria (12 no.) against which residential proposals can be assessed at the 3 no. levels, being: the neighbourhood, the site, and the home.

4.3.3. The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 that: *'the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...'*

4.3.4. Statement of Consistency with the Sustainable Residential Development in Urban Areas Guidelines / Urban Design Manual

- With regard to sequential approaches to development, it is notable that the subject site is located in a built up urban area with mix use developments surrounding the site to the east, south and west. The site is zoned Z3 (Neighbourhood Centres) in the existing CDP. The proposed development is therefore considered to be in compliance with the sequential approach to development of land and makes efficient use of available lands by promoting a wider variety of non-residential uses and catering for a high density residential development at a prominent corner location well served by existing public transport and local services.
- The design, layout and built form of the development has been guided by the principles of urban design set out in the guidelines. The principles of urban design set out in the guidelines are largely translated into the design objectives and standards for residential development contained in the existing CDP and, as detailed Section 6 of this statement, the development complies with the objectives of the CDP and those standards have informed the nature, scale and form of development, ensuring a plan-led approach in compliance with the guidelines.
- The application site is well served by existing public transport and local services and is zoned "Z3" in the CDP. The proposed development is therefore compliant with the guidelines in terms of the sequential



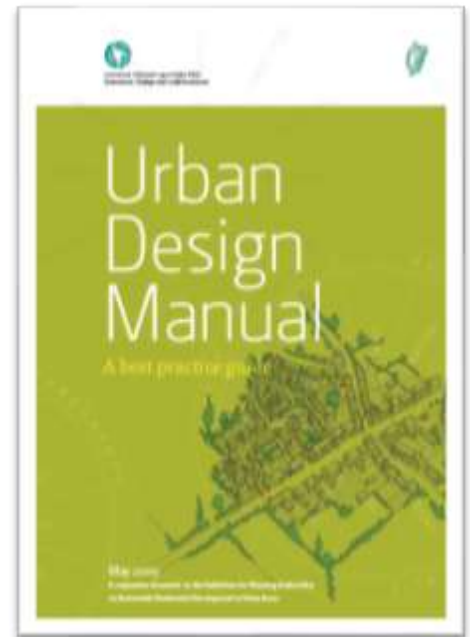
development approach. The proposed development is also considered to be making the most efficient use of the lands available increasing residential development in an existing urban area and providing for high density residential development in a key location above ground floor level retail / commercial, community and residential amenity uses.

- Sustainable neighbourhoods require a range of community facilities, while each neighbourhood needs to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The site is well served by existing infrastructure available in the Santry area, as detailed in the Social & Community Infrastructure Assessment which accompanies the application as a separate, standalone, document.
- In the context of the guidelines, the site can be considered to be '*Public Transport Corridor*'. With regard to density on such sites, Section 5.8 of the guidelines recommends that: '*in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes*'. The development provides for a density of c. 233 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including public transport links, that the proposed density on site is appropriate in this instance. The proposed density is also put forward with consideration to the guidance of the NPF, the UD&BHG, the Apartment Guidelines, and the Rebuilding Ireland programme. As previously discussed, a key element of all these documents is to promote compact development in existing urban areas by increasing building heights and densities in order to accelerate housing supply.
- The guidelines also focus on the provision of sustainable residential development, including the promotion of layouts that prioritise sustainable transport modes by reducing car use and are universally accessible and legible for ease of movement, In this regard the development is considered to be highly accessible for future occupants as well as the existing community with a permeable layout both internally and externally as new linkages are provided to surrounding land uses, and is therefore compliant with the guidelines.
- The proposed development also has regard to the advice set down in the 'In Practice' section of the accompanying Urban Design Manual , which recommends the following approach:
 - **Development Brief:** An analysis of the site has been carried out included a review of the existing surrounding environs. The development has been designed as to ensure that the proposed scheme is in keeping with / responds to the design of the surrounding development, particularly the permitted Santry Place development to the south which is currently under construction by the applicant. The development has also had regard to the existing site conditions such as access and egress, with proposed accesses being in keeping with those permitted for the Santry Place development.
 - **Site Analysis:** The characteristics of the subject site and surrounding context has been established and potential linkages and vistas to adjoining lands analysed.
 - **Concept Proposals:** This application is accompanied by an Architectural Design Statement which outlines the concept design proposal.
 - **Pre-planning:** Pre-Planning discussions were held with both Dublin City Council and An Bord Pleanála. Details of these meetings are discussed in Planning Report which accompanies the application as a separate document.

- As previously stated, application is accompanied by an Architectural Design Statement which fully details proposed development's compliance with the 12 Design Criteria and Indicators contained in the Urban Design Manual, which is also in accordance with the requirements of the current Dublin City Development Plan (Chapter 3 – Placemaking). The Architectural Design Statement should be read in conjunction with this statement, and the plans / particulars lodged with the application. For convenience, the 12 Design Criteria of the Urban Design Manual are also discussed below.

“Context: How does the development respond to its surroundings?”

The application site is situated at a prominent corner location on the junction of Santry Avenue and Swords Road, the latter of which is a well-established entrance route into Dublin from the north of the city. The site is located in a built up urban area and within walking distance of a range of local services and amenity space; however, it is currently a brownfield site in private use and contributes little in terms of aesthetics to the existing environs. Given its location it is considered that the site is very much underutilised and represents inefficient planning in its current state.



The proposed development seeks to remedy this situation by regenerating the site as a new, residentially led, urban area. The height, scale, and massing, of the development has been informed by the strategic location of the site, adjacent to a public transport corridor, while taking cognisance of the surrounding developments.

The tallest element of the scheme (14 storeys - Block A) is located at the corner of Santry Avenue and Swords Road, giving a landmark element at a prominent location on one of the main routes from the north into Dublin city. In the context of the size of the existing junction, the presence of open space to the immediate north and north/west, and the lack of residential dwellings to the west, it is considered that the height of Block A is easily accommodated without any detriment to existing amenity.

To the west of Block A, Blocks D & E, as they front onto Santry Avenue, provide for 10 storeys, giving strong frontage and definition to the Santry Avenue streetscape, both complimenting and contrasting with the opposite a large regional park (Santry Demesne). The locational context of Blocks A, D & E, adjacent to existing roads and open space, create an ideal opportunity for increased heights which, again, is not to the detriment of existing amenity in the vicinity.

To the rear of the site, Blocks B, C & F cater for 7 storey buildings, and are aligned with the permitted 7 storey blocks to the south which are currently under construction i.e. the Santry Place development. The setting and heights of Blocks B, C & F, together with the location of the proposed public and communal space provisions, provide for full integration between permitted and proposed developments, allowing for an new urban, residentially led, quarter to be developed at this important corner location.

The proposed 7 storey height of Block G appropriately addresses the south-west corner of the site and caters for efficient use given that the surrounding development to the west / south-west is made up of commercial/retail uses, therefore the development has limited potential to impact these uses.

Furthermore, the proposed non-residential elements of the development, including for 4 no. retail / commercial units, a medical suite / GP Practice unit, a community use unit, and a residential amenity



use unit, are located at ground floor level and front on to Swords Road and Santry Avenue, creating activity and a sense of vibrancy.

It is considered that the development responds to its context by creating a strong street edge with the layout of the buildings, in a north-south orientation, paying cognisance to the permitted development to the south at Santry Place. Punctuation into the site, through the positioning of the buildings, allows for light penetration and a visual connection to Santry Park, and inviting people into the scheme with direct permeability catered for between the development and Santry Place to the south.

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

In its existing state, the site currently in private use and generally inaccessible to the wider community. The development will open the site to pedestrians and cyclists with permeability / accessibility provided from both Santry Avenue and Swords Road. Vehicular access to the development will be from both Santry Avenue and Swords Road, with permitted entrances for the Santry Place development incorporated into the proposed layout. There will be direct connectivity between the development and Santry Place to the south, with the layout of the blocks ensuring that proposed public and communal open spaces are integrated with the permitted public and communal open spaces at Santry Place. Along the northern and eastern boundaries of the site, the setback of the buildings provides for paths thus connecting the development to the wider environs, which is a significant improvement from the site's current condition.

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

The development includes a wide mix of unit types / sizes including 1, 2, and 3 bed apartments, which caters for a variety of household formations, living arrangements and demographics, in a long established urban neighbourhood. Falls and gradients are minimised wherever possible and level access is catered for at all parking locations. All of the residential units will meet the requirements of Part M of the Technical Guidance Documents where accessibility is concerned. The ground level public and communal open space, located between the blocks, are overlooked to ensure active surveillance and enhanced security.

The proposed non-residential elements of the development are located at ground floor level and front on to Swords Road and Santry Avenue, creating activity and ease of access / use. In particular, the residential amenity use unit provides for a welcoming entrance point to the development for future residents and will create a common area for the future residents.

The proposed internal road network wraps around the blocks, providing for a legible layout. The development provides for disabled car parking spaces and secure bicycle parking areas.

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

The development includes a wide mix of unit types / sizes including 1, 2 and 3 bed dwellings. A wide variety of tenures and housing formats are provided to suit a range of lifestyles and demographics. The proposed non-residential elements of the development are located at ground floor level and front on to Swords Road and Santry Avenue, creating an animated street frontage. These non-residential uses provide for 4 no. retail / commercial units, medical suite / GP Practice unit, a community use unit, and a residential amenity use unit, which creates a variety of appropriate uses to serve both future residents and the wider community as applicable.

At the heart of the scheme is a large area of public open space which is laid out in a manner that provides direct visual connection to the north to Santry Park. Together with this public open space, the proposed



surface level communal open spaces located between the blocks provide visual and physical connection to the public and communal open spaces at Santry Place to the south. The proposed open spaces facilitate seating and children's play providing visual amenity.

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

The development provides a gross and net density of c. 233 dwellings per hectare. The proposed density is therefore considered to be making full, efficient, use of the available lands. The proposed density and building heights capture the opportunity to develop the site appropriately, with the site's location adjacent to public transport options and existing surrounding environs ensuring that the site is capable of supporting such height and density without any detriment to existing residential amenity.

At ground floor, the proposed non-residential elements of the development cater for a variety of services to support local needs, in compliance with the Z3 zoning attached to the site, and create a vibrant street frontage that will ameliorate the current brownfield condition of the site.

Pedestrian links are maximised within the development, including permeability into adjoining lands. SUDS areas are proposed within the site which will create attractive area for biodiversity. The provision of roof terraces ensure that the an ample supply of communal open space is provided for future residents. The layout and orientation of the development has been designed to have regard to aspect and views and ensure dwellings and areas of public, private and communal open space achieve light throughout the day.

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

The subject site occupies a prominent corner location which is currently underutilised. Given the scale of surrounding development, the existing use of the site is lost and provides for little definition or sense of place. The current industrial, low level, and enclosed, nature of the site will be significantly improved by the proposed development.

A sense of place to be achieved will be through the positioning of the varied building heights and by the design of the hard and soft landscape. The combination of these factors will give the development definition and legibility within the wider environs. Block A will provide for a landmark building announcing both the development and the urban environs of Dublin city as commuters enter from the north of the city. Blocks A, D & E, as they front onto Santry Avenue, give a strong urban frontage to the streetscape which both compliments and contrasts with the large regional park to the north (Santry Demesne). The proposed residential amenity unit, located between Blocks A & D, provides for a welcoming and defined entrance to the development, while also providing an appropriate boundary for the communal open space location to its rear.

The centrally located public open space provides for visual and tangible connection for the wider public between Santry Park (to the north) and Santry Place (to the south). The central open space includes play facilities and hard and soft landscaping, while proposed boundary treatments will define public, private and communal open area. The proposed roof terraces also aid the creation of a sense of place and community within the development.

With regard to the wider community, the proposed non-residential uses, includes for 4 no. retail / commercial unit, a medical suite / GP Practice and community use unit, will create an defined new urban area in Santry which caters for activity and a variety of uses.

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

The development provides for significant improvements to the public realm and pedestrian accessibility to the site, therefore creating a people friendly environment of streets and spaces. Proposed routes through the site follow the principles of DMURS ensures that traffic speeds are minimised and that the pedestrian is favoured. The priority for access into and through the site and onwards to adjoining lands to be south is afforded to pedestrians and cyclists. A mixture of shared surfaces and limited surface parking will also aid the creation of a pedestrian friendly environment.

The areas of public and communal open space are centrally located in easy walking distance of all dwellings. This open space incorporates a playground and is overlooked by dwellings on all sides for active supervision. The development also provides for high quality ground floor active uses which will invite and attract people to the development thereby creating attractive and friendly spaces and provide activity throughout the day.

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

The non-residential ground floor uses fronting the Swords Road and Santry Avenue ensure an appropriate level of activity is provided at street level as to create a safe, secure and enjoyable public areas. The public open space provision for the development is centrally located so as to be in easy walking distance of all dwellings and passively supervised. The open space incorporates children’s play, with direct connections to adjoining open space to the south, and visual connectivity to Santry Park to the north. Communal open spaces for the development are also centrally located so as to be in easy walking distance of all dwellings and passively supervised. The layout of the blocks allows for light penetration into these areas of open space for maximum amenity. Landscaping and boundary treatments will ensure that communal and public open spaces are clearly defined from each other, ensuring a safe and enjoyable environment for the future residents.

“Adaptability: How will the buildings cope with change?”

All the proposed residential units meet and / or exceed the minimum standards for residential dwellings detailed in the Apartment Guidelines. The development provides a mix of 1, 2 & 3 bed dwellings that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident.

The proposed buildings are to be finished in high quality metal cladding, brick, louvered screens and glazing are the primary materials proposed, giving a character of strength and robustness befitting the industrial context. The choice of materials also has a strong durability with minimal maintenance and upkeep requirements. The units are designed to be compliant with Building Regulations and will incorporate sustainable heating and energy efficiency requirements. A Building Life Cycle Report has been prepared by Armstrong Fenton Associates and is enclosed with the application as a separate document. The Building Life Cycle Report demonstrates how the development will adopt to changes life cycles and tenures.

“Privacy / Amenity: How do the buildings provide a high quality amenity?”

Each dwelling has access to usable private outdoor space, in the form of terraces at ground floor level and balconies on all upper floors, which meets and/ or exceeds the minimum standards for residential dwellings detailed in the Apartment Guidelines. The development caters for a ratio of dual aspect dwellings in compliance with the Apartment Guidelines. All of the dwellings meet and / or exceed the



minimum standards for storage and internal living space detailed in the Apartment Guidelines. Adequate and accessible bin storage is also provided for within the scheme.

The proposed layout also has due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling and provides for adequate separation distances between dwellings / blocks. This ensures a high level of privacy and amenity areas and reduces the level of overlooking and overshadowing. In addition, the development provides for high quality amenity space in the form of landscaped open space and roof terraces. The provision of the high quality public and communal open space, in compliance with the standards stated in the existing CDP and the Apartment Guidelines, ensures high quality areas residential amenity for future residents.

“Parking: How will the parking be secure and attractive?”

In total, the development caters for 209 no. car parking spaces provided for in the form of basement level parking and surface level parking. The basement level includes for 173 no. car parking spaces. The basement level is internally accessible from cores of Blocks A, B, C, D, E, & F, while external vehicular access is from the south between Blocks B & C. An additional 36 no. car parking spaces

are also provided for within the site at surface level.

Parking at both basement and surface level will be well lit, while surface level parking is laid out so as to be overlooked by the dwellings for further security. Contrasting hard landscaping and occasional planting will define the parking zones.

The development also caters for 777 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within proposed blocks. Of the proposed bicycle parking provision, 719 no. bicycle parking spaces are catered for at basement level and a further 58 proposed as short term term stay on surface level.

“Detailed Design: How well thought through is the building and landscape design?”

An approach has been outlined to the development of the street elevations in terms of place making and the creation of a recognisable neighbourhood through a combination building form, elevation materials and hard and soft landscape.

The development has been subject to pre-application consultations between the design team, Dublin City Council and An Bord Pleanála, which have fully informed the proposed design, ensuring a plan led development that appropriately addresses the contextual location of the site, the protection of existing amenity, and need to efficiently develop the site in light of national planning policy.

The design of the buildings seeks to create a new landmark at this important node, providing a robust range of unit types and sizes to reflect the needs of a range of households, living arrangements and economic situations. Passive surveillance of adjoining public and private space has been a key driver in design development through the maximalisation of active frontages and the siting of entrances and windows.

An Architectural Design Statement, prepared by Davey & Smith Architects, which sets out a comprehensive design rationale for the development, is enclosed with the application – please refer to same for further details. A Landscape Design Rationale has also been prepared by Dermot Foley Landscape Architects is also enclosed with the application. The landscape strategy ensures appropriate boundary treatments are provided in addition to a well-designed landscape strategy for the roof terraces,

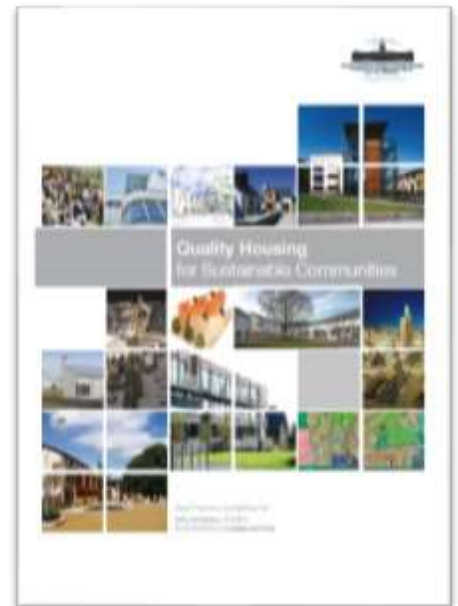
public, and communal open spaces, to ensure the use of these spaces is maintained throughout the year.

- Given all the foregoing it is considered that the development is fully compliant with the guidance for new developments set out in the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities and the accompanying Urban Design Manual (2009).

4.4. Quality Housing for Sustainable Communities - Best Practice Guidelines (2007)

4.4.1. The Quality Housing for Sustainable Communities Guidelines promote high standards in the design and construction of new residential developments. The guidelines identify core principles and criteria that have been found, from experience, to be particularly relevant to the creation of high-quality living environments for future residents. Guidance within this document is arranged under five headings as follows:

- Site Selection
- Design Brief, Procurement and Cost Control
- Urban Design Objectives in the Provision of Housing
- Scheme Layout and Design
- Dwelling Design



4.4.2. Statement of Consistency with the Quality Housing for Sustainable Communities

- The application is accompanied by a Quality Housing Assessment which demonstrates that the proposed dwellings conform to the principles and criteria set out within the Quality Housing for Sustainable Communities guidelines, where applicable.
- The application is also accompanied by an Architectural Design Statement, prepared by Davey & Smith Architects, and a Planning Report, prepared by Armstrong Fenton Associates, which demonstrates development's compliance with the aforementioned guidelines and the Apartment Guidelines – for full details please refer to same.



4.5. Childcare Facilities Guidelines for Planning Authorities (2001)

4.5.1. The Childcare Facilities Guidelines for Planning Authorities direct Planning Authorities to facilitate the provision of childcare facilities in appropriate locations. The guidelines state that, in general, one new facility catering for 20 no. childcare places should be developed for every 75 new residential dwellings. The guidelines also provide broader guidance on internal room sizes for childcare facilities.

4.5.2. The guidelines state that the provision of new childcare facilities should **have regard to the location of existing facilities, emerging demographics in the area**, and advise that the provision of childcare facilities should form an integral part of pre-planning consultations between applicants and Planning Authorities.

4.5.3. Statement of Consistency with the Childcare Facilities Guidelines



- The guidelines state that, in general, one new facility catering for 20 childcare places should be developed for every 75 new residential dwellings. Based upon the proposed development of 350 no. dwellings this would equate to a provision of c. 93 no. childcare places; however, the more recent Apartment Guidelines state with regard to childcare provision that: *“One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision”*. The development caters for 113 no. 1 bedroom apartments and as such, when the 1 bedroom dwellings are discounted, the development caters for 237 no. dwellings which equates to a provision of c. 63 no. childcare places.
- The childcare guidelines note that the above threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. In line with these two factors, following the preparation of a childcare needs assessment (enclosed as part of the Social & Community Infrastructure Assessment which accompanies the application as a separate document), the applicant submits that the existing level of childcare throughout the surrounding catchment area is more than capable of catering for the 63 no. childcare places recommended for the development.
- The childcare assessment carried out as part of the application identified that the catchment area of the site is an area already well-served by existing facilities. Most notably, there is a recently opened childcare facility which forms part of the Santry Place development to the immediate south of the site. The childcare assessment details that there are 69 no. confirmed childcare vacancies in the catchment area, 36 no. surplus childcare places in a recently permitted childcare facility at Omni Park. As such, it is considered that there are c. 105 no. existing / permitted childcare places available within walking distance of the development, which is more than adequate to serve the expected demand generated by the development.
- Taking all of the foregoing into consideration, it is put forward that there is sufficient capacity to accommodate the childcare needs that may be generated by the development and that to provide a childcare facility within the proposed development would not be economically viable nor represent proper planning of the site given the existing facilities and available childcare places in the vicinity of the site. For full details, please refer to the Social & Community Infrastructure Assessment which accompanies the application as a separate standalone document.

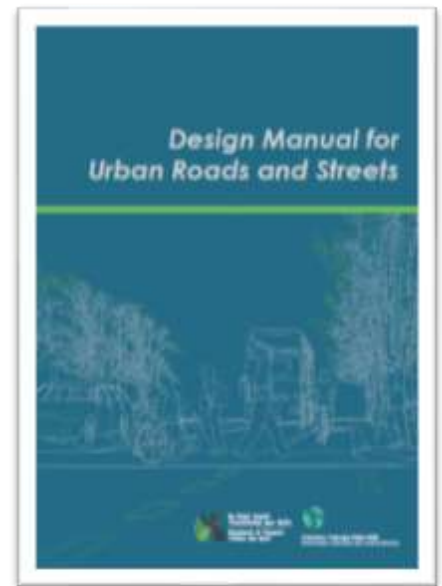
4.6. Design Manual for Urban Roads and Streets (2013)

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

4.6.2. A key element of the DMURS is the need to design roads and streets as destinations rather than traffic corridors and, as such, a focus is placed upon the needs of pedestrians, cyclists, public transport users and enhancement of the public realm.

4.6.3. Statement of Consistency with the Design Manual for Urban Roads and Streets.

- The principle design guidance of DMURS has been considered in the design of the development and incorporated into the street / building layout. A Statement of Compliance with DMURS has been prepared by DBFL Consulting Engineers and is enclosed with the application as a separate document – for full details please refer to same.
- It is considered that the proposed layout successfully creates an appropriate balance between the functional requirements of different network users whilst enhancing the ‘sense of place’ and, as demonstrated in the enclosed document, the development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.
- DMURS principles and considerations within the proposed scheme are also discussed in the Architectural Design Statement prepared by Davey & Smith Architects which accompanies the application as a separate document.



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

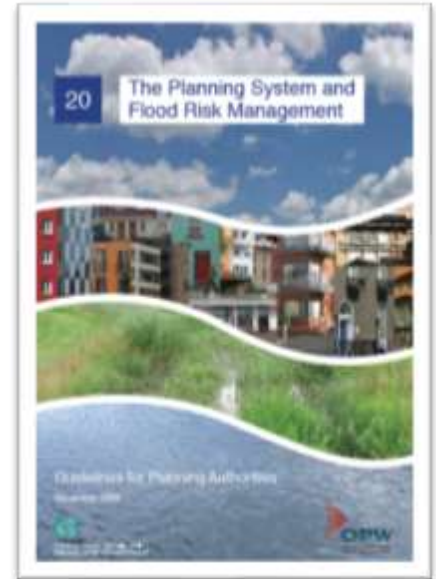
4.7.1. The Planning System and Flood Risk Management Guidelines provide detailed guidance on the role that flood risk should play at different levels of the planning system. The guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

4.7.2. Planning Authorities must implement these guidelines to ensure that, where relevant, flood risk is a key consideration in development plans and local area plans and in the assessment of planning applications. The guidelines should also be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

4.7.3. These guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process.

4.7.4. Statement of Consistency with the Flood Risk Management Guidelines

- A Site Specific Flood Risk Assessment (SSFRA) prepared by DBFL Consulting Engineers accompanies the application as a separate standalone document. The SSFRA has been prepared to comply with current planning legislation, in particular the recommendations of the guidelines for full details please refer to same; however for convenience a summary is provided below.
- The site is located within Flood Zone C and the enclosed SSFRA confirms that and therefore a Justification Test is not required. The SSFRA asserts that a regularly maintained drainage system will ensure that the network remains effective and in good working order should a large pluvial storm occur. In the event of extreme pluvial flooding then overland flood routes will direct water towards the open space areas. While the development constitutes 'highly vulnerable' development, it is appropriate for this flood zone and the scheme is designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable. The development does not increase the risk of flooding to adjacent areas and roads once mitigation measures are implemented.
- Taking the above into consideration, it is put forward that the site is in compliance with the core principles of the Planning System and Flood Risk Management Guidelines and has been subject to a commensurate assessment of risk.



4.8. Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)

- 4.8.1.** Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities, prepared jointly by the National Parks and Wildlife Services and Planning Divisions of the Department of Environment, Culture and Local Government, sets out the different steps and stages that are needed to establish whether a plan or project can be implemented without damaging an existing Natura 2000 site.
- 4.8.2.** The guidelines indicate the role to be played by professional ecologists and other professionals in identifying potential impacts on same and provide details on potential mitigation measures needed to avoid such impacts. Where such impacts cannot be avoided the guidelines detail imperative reasons of overriding public interest which may allow a project to proceed.

4.8.3. Statement of Consistency with Appropriate Assessment of Plans and Projects in Ireland

- In accordance with the above guidelines, the subject application is accompanied by an Appropriate Assessment (AA) Screening Report prepared by Enviroguide Consulting. The AA Screening Report has assessed the development’s likely impact upon Natura 2000 sites, both individually and in combination with other projects, and considers whether these impacts are likely to be significant on the qualifying interests of the Natura sites.
- The AA Screening concludes that there will be no significant effect on the Natura 2000 sites located within 15km of the subject site , therefore, the AA screening process does not need to progress to Stage 2.
- Given all the foregoing it is considered that the development is fully compliant with the guidance for Appropriate Assessment of Plans and Projects in Ireland.



4.9. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)

4.9.1 The purpose of the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment is to provide practical guidance to planning authorities and An Bord Pleanála so that there can be greater consistency in the methodology adopted by consent authorities.

4.9.2 Statement of Consistency:

- The development is under the threshold for the requirement of an Environmental Impact Assessment Report (EIAR) as detailed under Part 2(10) (b) of the Planning and Development Regulations 2001 (as amended).
- While the proposed development does not alone exceed the required thresholds for the preparation of an Environmental Impact Assessment Report (EIAR), cognisance has been paid to the contextual location of the proposed development and the potential cumulative effects of the proposed development in combination with other developments in the vicinity which have recently been permitted and/or are currently under construction. Therefore, to ensure a thorough assessment of environmental impacts, an ‘Environmental Impact Assessment Report’ (EIAR), which also constitutes an Environmental Impact Statement (EIS) for the purposes of the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001-2018, has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying the application.
- The EIAR has been prepared in accordance with Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16 April 2014 as an amendment of Directive 2011/92/EU. For full details please refer to the EIAR which accompanies the application.





- The enclosed EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application.

- Given all the foregoing it is considered that the development is fully compliant with the guidance for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018), and in accordance with the relevant environmental legislation.

5.0. Consistency with Regional Policy

5.0.1. This section details the proposed development’s compliance with relevant national planning policy, namely: the Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 and the Transport Strategy for the Greater Dublin Area 2016-2035.

5.1. Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

5.1.1. The NPF is supported by the establishment of statutory Regional Spatial & Economic Strategies for Ireland’s three regional assemblies. The Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (hereafter E&MRSES) is the relevant regional strategy for the development.

5.1.2. The E&MRSES is a strategic plan and investment framework which aims to shape the future development of the Eastern and Midland Region up to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the State. The strategy identifies that the Eastern and Midland Region:

“is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region.”

5.1.3. The E&MRSES seeks to achieve the 10 no. National Strategic Outcomes of the NPF through the implementation of 16 no. Regional Strategic Outcomes as detailed in Figure 8. To achieve these Regional Strategic Outcomes, each chapter of the E&MRSES contains Regional Policy Objectives that promote coordinated spatial planning, sustainable use of resources and protection of the environment.

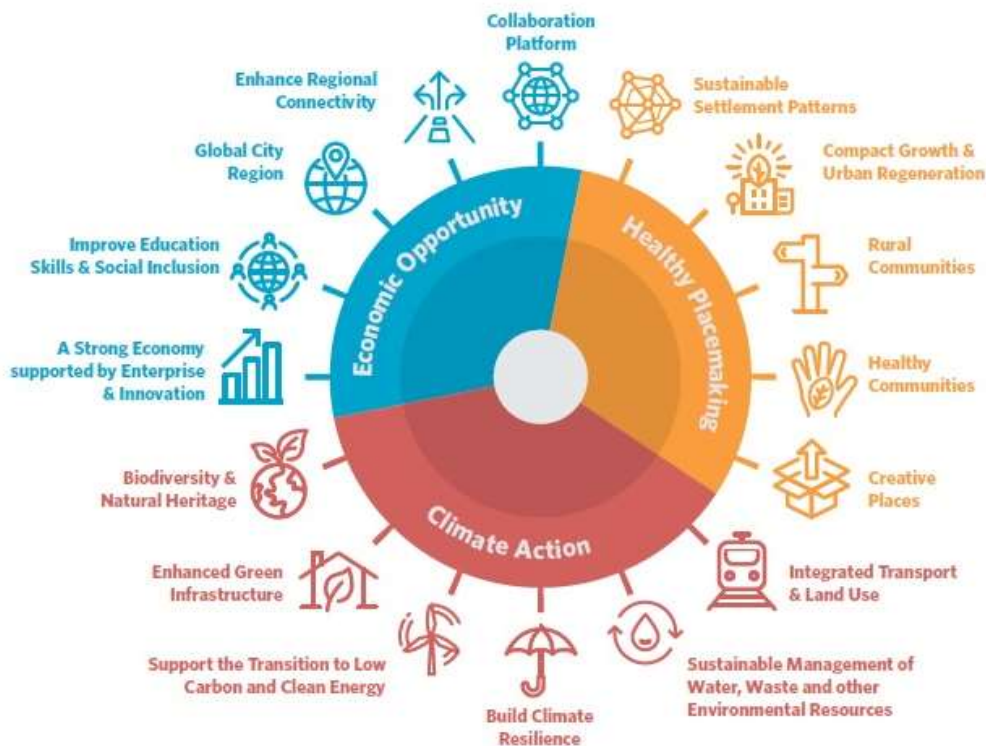


Figure 8 - Regional Strategic Outcomes of the E&MRSES.



- 5.1.4. The 2016 Census Results states the population of Dublin City as being c. 554,554 persons with the E&MRSES outlining a projected population target of between 638,500 and 655,000 by the year 2031, increasing the city's population by 84,000-100,500 persons over the next 10 years (a 15% - 18% growth rate). This projected growth rate emphasises the need to efficiently development lands available at higher densities and building heights.
- 5.1.5. The E&MRSES details that the region has a young demographic profile with the overall working age population projected to rise in the next decade. Accordingly, this effects the demand for housing required to support the labour market with family homes and smaller and one-person households also needing to be addressed.
- 5.1.6. The E&MRSES also details the prevailing state-wide trend of urbanisation, the region saw the continued increase in the share of population residing in urban areas alongside a strong growth in the peri-urban and rural areas surrounding Dublin. The region therefore has a challenge of counter-acting the severe slowdown in the development of new housing stock during the economic recession, which has resulted in supply and affordability pressures across housing tenures, particularly in Dublin.
- 5.1.7. The growth strategy for the region details the need to: *“Support the continued growth of Dublin as our national economic engine”*, and the need to: *“Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP).”*
- 5.1.8. In order to achieve the objectives of both the NPF and the E&MRSES, the document reiterates the need to achieve sustainable compact growth through means such as urban regeneration and infill development to revitalise existing settlements. The following Regional Policy Objectives are considered relevant:
- **Regional Policy Objective 3.2.** - *“Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”*
 - **Regional Policy Objective 3.3.** - *“Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*
- 5.1.9. Chapter 4 of the E&MRSES sets out the settlement hierarchy and the identification of key growth areas that will see significant development up to 2031 and beyond. With regard to Dublin City and its Suburbs the E&MRSES supports the continued growth of Dublin City with: *“a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration.”* The following Regional Policy Objective is considered relevant:
- **Regional Policy Objective 4.3.** - *“Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*
- 5.1.10. Chapter 5 of the E&MRSES has regard to the Dublin Metropolitan Area Strategic Plan (MASP). The E&MRSES notes the challenges of housing supply and affordability in Dublin and states that it is imperative that Dublin builds on its existing strengths as a global metropolitan region to continue to attract and retain investment. The vision of the Dublin Metropolitan Area over the next 20 years emphasises the need to enable regeneration and employment opportunities in established communities where redevelopment and re-intensification occurs, especially in areas of on-going deprivation.



5.1.11. Section 5.3 of the E&MRSES details the guiding principles for the growth of the Dublin Metropolitan Area. Of relevance to the subject application are the following:

- **Compact sustainable growth and accelerated housing delivery** - *“To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.”*
- **Integrated Transport and Land use** - *“To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of ‘BusConnects’, DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.”*
- **Social Regeneration** - *“To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.”*

5.1.12. The following Regional Policy Objectives are also considered relevant:

- **Regional Policy Objective 5.2.** - *“Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.”*
- **Regional Policy Objective 5.3.** - *“Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”*

5.1.13. Section 5.7 of the E&MRSES has regard to housing delivery in the MASP. The delivery of affordable housing is noted as key element of the continued growth and competitiveness of Dublin. The E&MRSES targets at least 7,500 housing units per annum to be provided in the metropolitan area up to the year 2040. The housing strategy for the MASP focuses on the consolidation of sites within or contiguous to the existing built up and zoned area of Dublin City and suburbs in tandem with the provision of public transport, infrastructure, and services. The E&MRSES notes that there is significant capacity to deliver increased residential densities on infill sites and through the re-use of underutilised lands and vacant buildings within the metropolitan area. The following Regional Policy Objectives are considered relevant:

- **Regional Policy Objective 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’.”*

5.1.14. Other Regional Policy Objectives of relevance are as follows:

- **Regional Policy Objective 9.4** - *“Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.”*
- **Regional Policy Objective 9.10** - *“In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the*



design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS).'"

5.1.15. Statement of Consistency with the E&MRSES

- It is considered that the proposed development is wholly consistent with the Regional Strategic Outcomes and Regional Policy Objectives of the E&MRSES.
- The proposed development provides for new homes at a sustainable location with strategic access to existing employment and services. The development offers an appropriate mix of housing typologies to support the growing trends for smaller households which supports the stated need for smaller households detailed in the E&MRSES and will aid supply and affordability pressures across housing tenures in Dublin.
- In support of Regional Policy Objective 3.2 & 3.3, the proposed development provides for compact growth within the existing built up area of Dublin and will regenerate an existing brownfield site at an appropriate density, as set out in the Sustainable Residential Development in Urban Areas, the UD&BHG, and the Apartment Guidelines.
- The proposed development supports the growth strategy of the E&MRSES by providing for high density residential development at an appropriate location, as well as a variety of non-residential uses which create employment opportunities within the development. It is therefore considered that the development supports the continued growth of Dublin as our national economic engine and delivers sustainable growth of the Metropolitan Area.
- In support of Regional Policy Objective 4.3, the proposed development provides for the consolidation and re-intensification of a brownfield site and caters for high density and people intensive uses within the existing built up area of Dublin City adjacent to existing public transport routes (the Swords Road QBC). Furthermore, in compliance with the vision for the Dublin Metropolitan Area detailed in the E&MRSES, caters for the regeneration of a brownfield site, and provides for and employment opportunities in an established community.
- In compliance with the guiding principles for the growth of the Dublin Metropolitan Area contained in the E&MRSES, the proposed development will aid the delivery of 50% of all new homes within or contiguous to the built-up area of Dublin City by providing for higher densities in a built up area served by existing public transport and the proposed BusConnects route on Swords Road. Furthermore, it is considered that the proposed non-residential uses forming part of the development realise the opportunity for social regeneration.
- The proposed development is located adjacent to a proposed BusConnects Corridor with the proposed density and building heights ensuring that the development maximises the efficiency / use of the site. The development promotes pedestrian / cyclist permeability throughout and provides for an ample provision of bicycle parking within the scheme. The development is therefore considered to be wholly compliant with Regional Policy Objectives 5.2, 5.3 & 9.10. of the E&MRSES.
- The proposed development provides for an appropriate mix of housing typologies, catering for 1, 2, & 3 bed apartments which will meet the needs of a variety of households and support the provision of lifetime adaptable homes. All the proposed dwellings are designed in compliance with the standards of the Apartment Guidelines and achieves the required density of the Sustainable Residential Development in



Urban Areas Guidelines. The development is therefore considered to be compliant with Regional Policy Objectives 5.4 & 9.4. of the E&MRSES.

5.2. Transport Strategy for the Greater Dublin Area 2016 - 2035

5.2.1. The Transport Strategy for the Greater Dublin Area 2016- 2035 was prepared by the National Transport Authority to ensure that Dublin remains a competitive, sustainable city-region with a good quality of life for all.

5.2.2. The strategy includes five overarching objectives to achieve the vision which are as follows:

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

5.2.3. The strategy sets out measures to achieve the vision and objectives for the Greater Dublin Area. These include better integration of land use planning and transportation, consolidating growth, providing more intensive development at appropriate locations and better control of parking options. The strategy includes for several major infrastructure schemes which are part of the Government's Transport 21 investment framework.

5.2.4. Statement of Consistency with the Transport Strategy for the Greater Dublin Area 2016 - 2035

5.2.5. The development provides for a gross and net density of c. 233 dwellings per hectare, adjacent to existing good quality public transport, in particular the Dublin Bus QBC on Swords Road, as well as the proposed BusConnects route on same. It is therefore considered that the development is fully in compliance with vision and objectives of the Transport Strategy for the Greater Dublin Area 2016- 2035.



6.0. Consistency with the Local Policy

6.0.1. The Dublin City Council Development Plan 2016-2022 (hereafter CDP) is the current statutory development plan relevant to the subject application and details the overall strategic policies and objectives for Dublin City, both within the life of the existing CDP and in the long term. This section provides an overview of the proposed development's high level compliance with the objectives of the CDP.

6.1. Zoning

6.1.2. Chapter 14 of the CDP has regard to 'Land-Use Zoning', with the zoning policies and objectives deriving from the core strategy of the CDP. The CDP underlines the need for re-development of underutilised and brownfield sites in order to consolidate existing development and ensure the efficient use of urban lands. The promotion of mix-use development and intensification of sustainable development adjacent and close to public transport nodes is also encouraged. It is considered that the proposed development fully supports these zoning principles.

6.1.3. The application site is zoned "Z3" (Neighbourhood Centres) which has an objective to: *"provide for and improve neighbourhood facilities."*

6.1.4. The CDP notes that Z3 zoned lands generally provide for local facilities within a residential neighbourhood which can range from neighbourhood centres to a more traditional parade of shops. The CDP goes on to state that Z3 lands:

"can form a focal point for a neighbourhood and provide a limited range of services to the local population within 5 minutes walking distance. Neighbourhood centres provide an essential and sustainable amenity for residential areas and it is important that they should be maintained and strengthened, where necessary. Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level. When opportunities arise, accessibility should be enhanced."

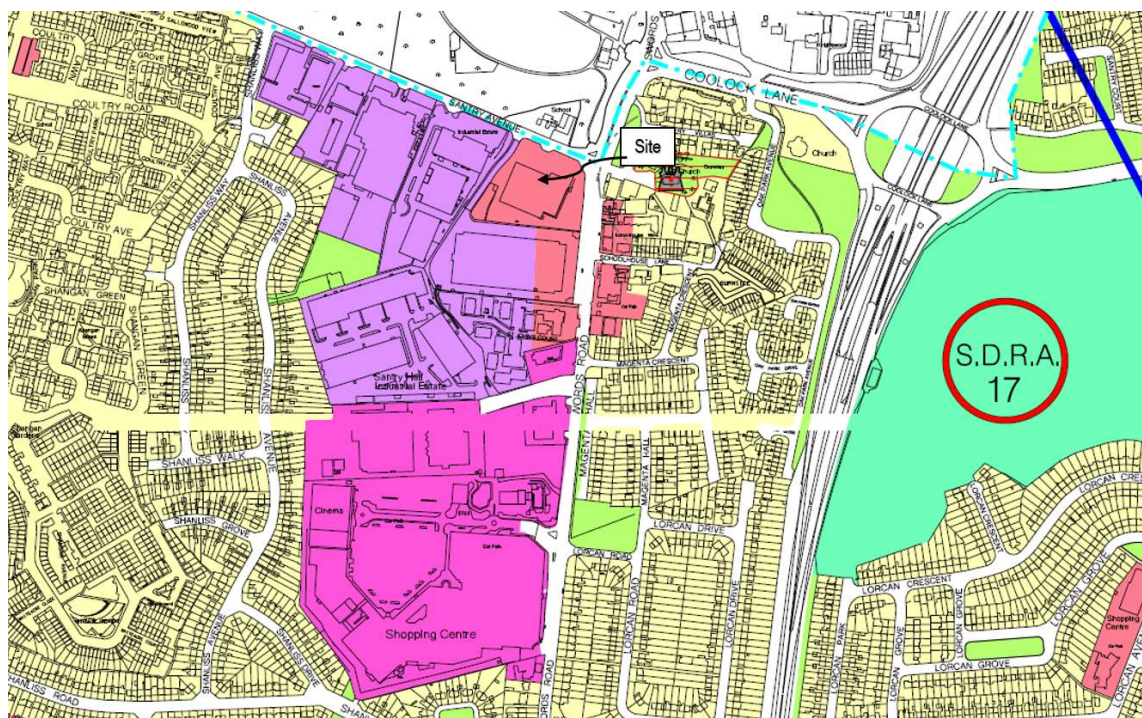


Figure 9 - Extract of Zoning Map B of the CDP.



6.1.5. The CDP sets out uses which may be 'permissible' and 'open for consideration' on Z3 lands, as follows:

Permissible Uses: Bed and breakfast, betting office, buildings for the health, safety and welfare of the public; car park, childcare facility, **community facility**, **cultural/ recreational building and uses**, education, enterprise centre, garden centre, guest house, home-based economic activity, industry (light), live-work units, medical and related consultants, office (max 300 sq. m), **open space**, part off-licence, primary health care centre, public service installation, **residential**, restaurant, **shop (neighbourhood)**, training centre.

Open for Consideration Uses: Advertisement and advertising structures, civic and amenity/recycling centre, embassy residential, garage (motor repair/service), household fuel depot, internet café, media- associated uses, office (max 600 sq. m), off-licence, petrol station, place of public worship, public house, take-away, veterinary surgery.

6.1.6. The proposed development provides for 350 no. 1, 2, & 3 bed apartments in 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G). In addition, 4 no. retail / commercial units (located on the ground floors of Blocks A, B & D) and a medical suite / GP practice unit, a community use unit (located on the ground floor of Block E) are included for within the development. A residential amenity use unit is also catered for within the development (located at ground floor level between Blocks A & D).

Having regard to the listed '*permissible uses*' for Z3 lands, it is considered that the development is fully compliant with the Z3 zoning attached to the site. In particular, the development caters for proposed retail / commercial, community, and residential amenity, uses at ground floor level, with all of these non-residential uses fronting onto Santry Avenue and Swords Road. It is considered that these uses will create a new focal point for the locality and provide a range of services to the local population within walking distance, in compliance with the vision for Z3 lands. Also in compliance with the vision for Z3 lands, the development caters for higher density residential development above ground floor level.

6.1.7. The adjoining lands to the immediate south of the site, are zoned a mixture of Z3 and Z4. The lands to south are currently being developed by the applicant under Dublin City Council Ref's. 2317/17 & 2737/19, with the development known as Santry Place. The subject application has been designed with regard Section 14.7 (Transitional Zone Areas) of the CDP in relation to the avoidance of abrupt transitions of scale between zonings. 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.

6.1.8. Having regard to all the above, it is considered that the proposed development clearly complies with the Z3 zoning attached to the site.

6.2. Core Strategy

6.2.1. Chapter 2 of the CDP has regard 'Vision and Core Strategy' for Dublin and sets out the overall aims for the future growth and development of the city. In general, the CDP, seeks to create a more sustainable and resilient city with an improved quality of life for all.

6.2.2. Table A of the Core Strategy sets out the '*Population and Housing Figures Based on Census Data 2011, Estimate for 2013 and RPG Allocations*' and identifies a need for approximately 29,500 new residential dwellings over the life of the CDP. This figure is based on the assumption of an average occupancy rate of two persons per dwelling. The Core Strategy plans to exceed this figure in the housing strategy during the life of the CDP in order to accommodate longer-term sustainable growth.



6.2.3. Table C of the Core Strategy quantifies the area of land zoned for residential development (4,466 hectares) or for a mix of uses including residential (2,043 hectares). Table C of the Core Strategy includes for Z3 zoned lands. In this regard, the subject Z3 zoned lands are included in Core Strategy calculations for achieving sufficient zoned lands to cater for targeted population growth. In this context, it is considered that the proposed development of the subject site for residential purposes supports the achievement of Core Strategy housing targets.

6.2.4. Section 2.3 of the CDP states that both the long-term vision and the Core Strategy can be translated into 3 no. 'strongly interwoven strands', as follows:

1. *Compact, Quality, Green, Connected City*
2. *A Prosperous, Enterprising, Creative City*
3. *Creating Sustainable Neighbourhoods and Communities*

In summary, 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. Having regard to all the above, the development is considered to fully comply with the Core Strategy of the CDP.

6.3. Building Height

6.3.1. Section 4.5.4 of the existing Dublin City Development Plan 2016-2022 (hereafter 'CDP') has regard to "*Taller Buildings as Part of the Urban Form and Spatial Structure of Dublin*".

6.3.2. While the CDP states that Dublin City Council recognises the merits of taller buildings, and acknowledges that taller buildings can have an important visual role, capable of making a positive contribution to the skyline, it is stated that the 'Managing Intensification and Change: A Strategy for Dublin Building Height' (DEGW, 2000) study commissioned by Dublin City Council: "identified character areas and locations within the city which would allow for largescale growth, including height clusters, particularly close to major public transport nodes."

6.3.3. Section 4.5.4.1 of the CDP also states: "Clustering of taller buildings of the type needed to promote significant densities of commercial and residential space are likely to be achieved in a limited number of areas only."

6.3.4. As such, it is a policy of the existing CDP to provide for taller buildings in limited locations as identified in the '*Building Height in Dublin*' map of the CDP.

6.3.5. Figure 39 of Section 16.7 of the CDP, "*Building Height in Dublin Context*", identifies the 14 no. specific areas across Dublin City Council's administrative area for mid-rise (up to 50m) and taller (above 50m) buildings to be developed. Outside of these identified areas, the CDP states that it is policy: "to retain the remaining areas of the city to a maximum height of between 16m to 28m depending on location."

6.3.6. To this end, Section 16.7.2 of the CDP identifies the subject site as being an 'Outer City' location, in an area designated as low-rise development, with a building height limit of 16 metres for residential and commercial development.

6.3.7. The proposed development includes for 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), that range from c. 22.9m (7 storeys - Blocks B & G) to c. 48.3 meters (14 storeys - Block A). The proposed building heights are above the stated 16 metre height for the subject site's location, as stated in the CDP, and therefore, the exceedance of the proposed building heights in relation to the CDP height parameters may be deemed by the



Board to constitute a material contravention of the CDP.

Block	Total No. of Units	Building Height (Storeys)	Max. Building Height (Meters)
A	59	7 to 14	48.3
B	38	7	22.9
C	55	7	26.5
D	51	7 to 10	32.6
E	58	7 to 10	32.6
F	55	7	25.6
G	34	7	22.9

Proposed Building Heights.

- 6.3.8.** The proposed building heights are above the stated 16 metre height for the subject site's location, as stated in the CDP, and therefore, the exceedance of the proposed building heights in relation to the CDP height parameters may be deemed by the Board to constitute a material contravention of the CDP.
- 6.3.9.** As required in legislation, it is submitted that the proposed building heights can be justified under Section 37(2)(b) of the Act of 2000 where the Board may determine under this section, to grant a permission, even if the proposed development contravenes materially the CDP. This justification is detailed in the accompanying Material Contravention Statement prepared by Armstrong Fenton Associates, please refer to same.

6.4. Plot Ratio and Site Coverage

- 6.4.1.** Sections 16.5 & 16.6 of the CDP identifies indicative plot ratio of between 1.5-2.0 and site coverage of 60% for Z3 lands.
- 6.4.2.** The proposed development has total floor area of 26,488 sq.m (including the non-residential elements) and, based upon the gross site area of 1.5 hectares, produces a plot ratio of 1.76. The existing CDP states an indicative plot ratio of 1.5-2.0 for Z3 zoned lands. The proposed plot ratio is therefore considered to be appropriate and in line with the indicative ratios stated in the CDP.
- 6.4.3.** Based on the site area of 1.5 hectares the proposed site coverage is c. 33.5% While the site coverage is below the indicative figure set out in the CDP, due to the high quality provision of public and communal open space catered for within the development, it is noted that these parameters are **indicative only**. Site coverage is detailed in the CDP as being a tool particularly relevant in scenarios where open space and car parking standards are relaxed. It is considered that, having regard to the proposed density, plot ratio, and open space provisions, the site coverage is appropriate in this instance.

6.5. Density

- 6.5.1.** Section 16.4 of the CDP has regard to residential density. The CDP states that:



“Dublin City Council will promote sustainable residential densities in accordance with the standards and guidance set out in the DEHLG Guidelines on Sustainable Residential Development in Urban Areas and having regard to the policies and targets in the Regional Planning Guidelines 2010 – 2022 or any Regional Spatial and Economic Strategy that replaces the regional planning guidelines”.

Section 4.3.4. of this statement demonstrated that the development achieves / exceeds the minimum net density of 50 dwellings per hectare for subject site and is therefore in compliance with CDP standards in this regard.

The E&MRSES is the relevant regional strategy currently in place for Dublin. With regard to density, the E&MRSES sets the following relevant objective:

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

The development provides for the consolidation and re-intensification of a brownfield site and caters for high density and people intensive uses within the existing built up area of Dublin City adjacent to existing public transport routes (the Swords Road QBC) and is therefore in compliance with CDP standards in this regard.

6.5.2. CDP Policy SC13 also states that it a policy:

“To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city; which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.”

While Policy QH8 of the CDP seeks to:

“To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.”

6.5.3. 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.

6.6. Car Parking

6.6.1. Section 16.38 of the CDP has regard to car parking provision for new developments. In accordance with Map J *“Strategic Transport & Parking Areas”* of the CDP, the subject site is located in Area 3, which requires the following parking provisions, as detailed in Table 16.1. of the CDP:

- Residential - 1.5 per dwelling
- Other Retail- 1 per 75sq.m
- Cafés - 1 per 150sq.m seating area



- Cultural / Recreational Buildings - 1 per 100sq.m

If these standards were applied to the proposed development, it would result in a maximum of 538 no. car parking spaces being provided for the entire development; however, it is important to note that the CDP states that car parking standards are **“maximum in nature and may be reduced in specific, mainly inner city locations where it is demonstrated that other modes of transport are sufficient for the needs of residents”** (emphasis added) and that apartment spaces are mainly “to provide for car storage to support family-friendly living policies in the site and make apartments more attractive for all residents. **It is not intended to promote the use of the car within the city”** (emphasis added).

6.6.2. Given the nature of the proposed development, which largely comprises of apartment development, car parking must be considered in the context of the Apartment Guidelines. As previously discussed in Section 4.2 of this statement, the application site is considered to be a ‘Central and/or Accessible Urban Location’. In relation to such locations, the Apartment Guidelines state the following:

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

6.6.3. Given the contextual location of the application site, and with regard to the above guidance, the development provides a reduced overall car parking standard when compared to the existing CDP standards (which themselves are a maximum standard). In the context of the Apartment Guidelines the proposed car parking provisions are considered to be wholly justified by the proximity of the development to existing and proposed high quality public transport (bus) routes.

6.6.4. In total, the proposed development caters for total of 209 no. on-site dedicated car parking spaces to be provided, of which 173 no. spaces will be provided within the basement car parking and 36 no. residential and set down/visitors spaces also incorporating 6 no. mobility impaired and 3 no. car share (GoCar) spaces will be provided at surface level. Having regard to the Apartment Guidelines, the proposed car parking rate (c. 0.6 per dwelling) is considered appropriate. An assessment on car parking is contained in Transportation & Transport Assessment prepared by DBFL Consulting Engineers and is submitted with this application.

6.7. Bicycle Parking

6.7.1. Section 16.39 of the CDP has regard to bicycle parking provision for new developments. With regard to bicycle parking, Table 16.2 of the CDP sets out the following bicycle parking standards:

- Residential - 1 per dwelling
- Shops - 1 per 200sq.m
- Cafés - 1 per 200sq.m
- Cultural / Recreational Buildings - 1 per 200sq.m

6.7.2. If these standards were applied to the proposed development, it would result in a provision of c. 356 no. bicycle parking spaces being provided for the entire development. In total, the proposed development caters for 777 no. bicycle parking spaces (719 no. spaces at basement level; 58 no. bicycle parking spaces at surface level). This represents an ample provision of bicycle parking which complies with both the CDP and Apartment Guidelines standards for bicycle parking, therefore the development is considered to ensure the promotion of sustainable transport mode within the development. Please refer to the enclosed Traffic and Transport Assessment for full details of the bicycle parking provided.



6.8. Public Open Space

- 6.8.1.** Section 16.3.4. of the CDP has regard to public open space provisions for new developments. The CDP details that for Z3 zoned lands there is a requirement of 10% of the site area to be reserved as public open space.
- 6.8.2.** 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.
- 6.8.3.** 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.

6.9. Communal Open Space

- 6.9.1.** Section 16.10.1. of the CDP has regard to communal open space provisions for new apartment scheme. The CDP sets out the following quantitative provisions of communal open space for apartment schemes: 5 sq.m for 1 bed dwellings; 7 sq.m for 2 bed dwellings; and 9 sq.m for 3 bed dwellings. These parameters are aligned with the Apartment Guidelines standards which set out the following quantitative provisions of communal open space for apartment schemes: 5 sq.m for 1 bed dwellings; 6 sq.m for 2 bed / 3 person dwellings, 7 sq.m for 2 bed / 4 person dwellings and 9 sq.m for 3 bed dwellings.
- 6.9.2.** Based on these standards and the proposed dwelling mix, the communal open space requirements for the development equates to c. 2,246 sq.m. The development caters for 3,122sq.m of communal open space, which is in excess of the 2,256sq.m required.
- 6.9.3.** 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.
- 6.9.4.** Based on all the above, it is clear that the development is in compliance with the communal open space standards of the CDP.

Other Relevant CDP Policies

6.10. Climate Change

- 6.10.1.** Chapter 3 of the CDP 'Addressing Climate Change' contains a number of objectives in relation to design of new developments. Objectives considered relevant to the subject application are discussed below:
- **Objective CCO5** - "To support and collaborate on initiatives aimed at achieving more sustainable energy use, particularly in relation to the residential, commercial and transport sectors."



- **Objective CCO12** - *“To ensure high standards of energy efficiency in existing and new developments in line with good architectural conservation practice and to promote energy efficiency and conservation in the design and development of all new buildings in the city, encouraging improved environmental performance of building stock.”*
- **Objective CCO15** - *“To facilitate the provision of electricity charging infrastructure for electric vehicles.”*

Development 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. 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.

6.11. Shape and Structure of the City

6.11.1. Chapter 4 of the CDP *‘Shape and Structure of the City’* sets out the development strategy to ensure Dublin retains and builds on its renowned urban form and character, while developing new city neighbourhoods which are well connected to their surrounding environment and to the city centre. Policies considered relevant to the subject application are discussed below:

- **Policy SC10** - *“To develop and support the hierarchy of the suburban centres, ranging from the top tier key district centres, to district centres/urban villages and neighbourhood centres, in order to support the sustainable consolidation of the city and provide for the essential economic and community support for local neighbourhoods, including post offices and banks, where feasible, and to promote and enhance the distinctive character and sense of place of these areas.”*
- **Policy SC13** - *“To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.”*
- **Policy SC14** - *“To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.”*
- **Policy SC15** - *“To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public spaces.”*
- **Policy SC19** - *“To promote the development of a network of active, attractive and safe streets and public spaces which are memorable, and include, where appropriate, seating, and which encourage walking as*



the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.”

- **Policy SC20** - *“To promote the development of high quality streets and public spaces which are accessible and inclusive, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city’s diverse communities.”*
- **Policy SC21** - *“To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour, which promote safety and which accord with the principles of universal design, as set out in the Dublin City Public Realm Strategy.”*
- **Policy SC25** - *“To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city’s environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city’s built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.”*
- **Policy SC29** - *“To discourage dereliction and to promote the appropriate sustainable re-development of vacant and brownfield lands, and to prioritise the re-development of sites identified in Dublin Inner City Vacant Land Study 2015.”*
- **Policy SC30** - *“To promote residential use on upper floors of existing and new buildings and to support the Government’s Living City Initiative.”*

Development 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.

The site is located within walking distance of Santry’s urban/retail centre and adjacent to an existing public transport corridor, as such the proposed density of development is considered appropriate and, having regard to the existing environs, will not diminish existing residential amenity in the area. The proposed apartment blocks vary in types, size, length, and height which, together with the layout of proposed open spaces, creates a sense of place, visual interest, and variety. The proposed dwellings are a mix of 1, 2 and 3 bed dwellings which cater for a number of lifestyle choices and needs.

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. 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.



6.12. Quality Housing

6.12.1. Chapter 5 of the CDP 'Quality Housing' identifies that the provision of quality homes which provide for the needs of the city's population, and which contribute to the making of good, connected neighbourhoods as a key priority. Policies considered relevant to the subject application are discussed below:

- **Policy QH1** - *"To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2015) and 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009)."*
- **Policy QH2** - *"To have regard to the Regional Planning Guidelines for the Greater Dublin Area and make provision for the scale of population growth and housing allocations outlined in these Guidelines, taking account of the Central Statistics Office Regional Population Projections 2016 – 2031 and to have regard to any Regional Spatial and Economic Strategy that replaces the Regional Planning Guidelines."*

Development Compliance: It is considered that the proposed development wholly supports the above stated policies as previously detailed throughout this statement.

- **Policy QH5** - *"To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites."*
- **Policy QH6** - *"To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city."*
- **Policy QH7** - *"To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area."*

Development Compliance: The proposed development will deliver 350 no. apartments at an appropriate density on a zoned and underutilised brownfield site located at a prominent corner location on an established entrance route into the city. The development is put forward in support of the housing targets stated in the Core Strategy. The development provides for mixed-uses and contains a variety of housing types and tenures to support community facilities, public realm, residential amenities, and social inclusion. There is a variety of apartment types in a managed neighbourhood environment with on-site resident facilities, good public realm and amenities.

- **Policy QH8** - *"To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area."*
- **Policy QH9** - *"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."*

Development Compliance: The subject lands are currently underutilised. The proposed development will facilitate an efficient neighbourhood expansion in a location well served by public transport with the proposed buildings having generous setbacks from neighbouring development and punctuations in the buildings to avoid



any perceived bulk or massing, thus respecting the receiving environs. A phasing proposal is submitted with the application to ensure delivery of infrastructure is provided in tandem with residential development.

- **Policy QH10** - *“To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.”*
- **Policy QH11** - *“To ensure new developments and refurbishments are designed to promote safety and security and avoid anti-social behaviour in accordance with the Safety and Security Design Guidelines contained in Appendix 14.”*

Development 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 QH12** - *“To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new developments throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set out in the development plan.”*

Development Compliance: 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.

- **Policy QH15** - *“To require compliance with the City Council’s policy on the taking-in-charge of residential developments.”*
- **Policy QH16** - *“To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas and facilities in the context of the Multi-Unit Developments Act 2011, the Property Services (Regulation) Act 2011 and the establishment of the Property Services Regulatory Authority.”*

Development 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.

The Development Plan further notes that, in Dublin City, it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. With regards apartments, the DCC policies area as follows:

- **Policy QH18** - *“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, in accordance with the standards for residential accommodation.”*



- **Policy QH19** - *“To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable, mixed-income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.”*
- **Policy QH22** - *“To ensure that new housing development close to existing houses has regard to the character and scale of the existing houses unless there are strong design reasons for doing otherwise.”*

Development 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.

In relation to Policy QH22, as previously discussed throughout this statement, the development seeks to make better use of under-utilised land, in accordance with the density and height policies of the NPF, E&MRSES, UD&BHG and the Apartment Guidelines. Nonetheless, the proposed design has had due regard to the receiving environs to ensure that existing residential amenity in the area is protected / maintained.

6.13. Movement and Transport

6.13.1. Chapter 8 of the CDP *‘Movement and Transport’* sets out the development strategy to ensure the optimum use of existing and proposed transport infrastructure. Policies and objectives considered relevant to the subject application are discussed below:

- **Objective MTO1** - *“To encourage intensification and mixed-use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate, in order to guide future sustainable development.”*
- **Policy MT2** - *“Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government’s ‘Smarter Travel’ document and in the NTA’s draft transport strategy are key elements of this approach.”*

Development Compliance: The 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 MT12** - *“To 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 and accessible to all.”*
- **Policy MT13** - *“To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.”*

Development Compliance: Pedestrian permeability is catered for throughout the scheme, with the development providing for direct links to the Santry Place development to the south. A Traffic and Transport Assessment (TTA) and Mobility Management Plan accompany the application which detail the sustainable travel means supported by the development. The development promotes a reduction in car parking in compliance with the objectives of the NPF and the Apartment Guidelines, with the quantum of bicycle parking catered for ensuring an appropriate balance of travel options.

- **Policy MT17** - *“To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.”*
- **Policy MT18** - *“To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.”*

Development Compliance: Car parking provision is proposed at a ratio of c. 0.6 spaces per dwelling. The development promotes a reduction in car parking in compliance with the objectives of the NPF and the Apartment Guidelines, with the quantum of bicycle parking catered for ensuring an appropriate balance of travel options. Club car spaces are included for within the development.

- **Objective MTO25** - *“To support the growth of Electric Vehicles and e-bikes, with support facilities as an alternative to the use of fossil-fuel-burning vehicles, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations.”*

Development Compliance: EV car parking is provided for throughout the scheme, at a rate of 10%.

- **Objective MTO45** - *“To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.”*

Development 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. A Statement of Compliance with DMURS accompanies the application.

6.14. Sustainable Environmental Infrastructure

6.14.1. Chapter 9 of the CDP ‘Sustainable Environmental Infrastructure’ aims to provide and deliver infrastructural services which will enhance the quality of the city’s environment and also facilitate sustainable economic development and housing. Policies and objectives considered relevant to the subject application are discussed below:

- **Policy SI3** - *“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 exists or will become available within the life of a planning permission.”*



Development 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.

- **Objective SIO3** - *“To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems”.*

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

- **Policy SI10** - *“To have regard to the Guidelines for Planning Authorities on the Planning System and Flood Risk Management, and Technical Appendices, November 2009, published by the Department of the Environment, Community, and Local Government as may be revised/updated when assessing planning applications and in the preparation of plans both statutory and non-statutory.”*
- **Objective SIO8** - *“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, November 2009, as may be revised/updated and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan.*
 - *The site-specific flood risk assessment (SSFRA) shall pay particular emphasis to residual flood risks, 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. All potential sources of flood risk must be addressed in the SSFRA.”*

Development Compliance: A Site-Specific Flood Risk Assessment (SSFRA) has been carried out and accompanies the application.

- **Policy SI18** - *“To require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works. The following measures will apply:*
 - *The infiltration into the ground through the development of porous pavement such as permeable paving, swales, and detention basins*
 - *The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands*
 - *The slow-down of the movement of water.”*

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

- **Objective SIO16** - *“To require the provision of adequately- sized recycling facilities in new commercial and large-scale residential developments, where appropriate.”*

Development Compliance: The managed apartment development will have ample provision for recycling in the basement with segregated waste bin stores provided.



- **Objective SIO17** - *“To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re- use/recycled materials to be used shall be implemented by the developer.”*

Development Compliance: A Resource Waste Management Plan is enclosed as part of the application and provides for further details.

- **Policy SI26** - *“To ensure that the design of external lighting proposals minimises light spillage or pollution in the surrounding environment and has due regard to the residential amenity of the surrounding area.”*

Development Compliance: A Public Lighting Layout and associated analysis report is enclosed as part of the application and provides for further details.

6.15. Green Infrastructure, Open Space & Recreation

6.15.1. Chapter 10 of the CDP ‘Green Infrastructure, Open Space & Recreation’ aims to protect and enhance open spaces for both biodiversity and recreational use for benefit of the city’s sustainability and attractiveness as a place to live, work and visit. Policies and objectives considered relevant to the subject application are discussed below:

- **Policy GI2** - *“That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.”*

Development Compliance: An Appropriate Assessment Screening Report has been prepared by Enviroguide Consulting and is enclosed with the application. The Appropriate Assessment Screening Report concludes that there will be no significant effect on the Natura 2000 sites located within 15km of the subject site.

- **Policy GI5** - *“To promote permeability through our green infrastructure for pedestrians and cyclists.”*

Development Compliance: The development caters for footpaths as appropriate to encourage permeability throughout open spaces. The enclosed landscape strategy and landscape masterplan, prepared by Dermot Foley Landscape Architects, set out further sets out details in relation to same.

- **Objective GIO1** - *“To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city.*

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Development Compliance: Please refer to the enclosed landscape plans and details prepared by Dermot Foley Landscape Architects which demonstrates how Green Infrastructure is to be incorporated into the proposed development.

- **Objective GI13** – *“To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children.*



Development 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.

- **Policy GI33** - *“To seek the provision of children’s play facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.”*
- **Objective GIO32** - *“To endeavour to provide play spaces in every neighbourhood in the city, which are open to public use.”*

Development Compliance: As stated above, play facilities are included for as part of the development and are located within the public open space provision so as to be accessible.

6.16. Sustainable Communities and Neighbourhoods

6.16.1. Chapter 12 of the CDP ‘Sustainable Communities and Neighbourhoods’ relates to Sustainable Communities and Neighbourhoods. Policies and objectives considered relevant to the subject application are discussed below:

- **Policy SN1** - *“To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this Plan.”*

Development Compliance: The development is located adjacent to a neighbouring permitted residential settlement that is well served by existing neighbourhood infrastructure and public transport. The design incorporates the provision of outdoor and communal spaces for all ages. The provision of a large quantum of open spaces, urban square and community uses will enhance the quality of the development and invite both new residents of the scheme and neighbouring residents into the development to allow for a new urban community to be developed and integrated.

- **Policy SN4** - *“To have regard to the Department of Housing, Planning, Community and Local Government’s Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG’s Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA’s Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie).”*

Development Compliance: The development has been informed by the guidance of the aforementioned planning policy documents and comply with same, as previously discussed in this statement.

- **Policy SN5** - *“To ensure that applications for significant large new developments (over 50 Units) are accompanied by a Social Audit and an Implementation and Phasing Programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.”*

Development Compliance: A Social & Community Infrastructure Assessment has been prepared and is enclosed with the application. The enclosed Social & Community Infrastructure Assessment provides details



of existing facilities in the environs to serve the development. A phasing proposal is also enclosed with the application.

- **Policy SN16** - *“To ensure that the provision of strategic new community infrastructure complements the range of existing neighbourhood facilities and, where appropriate, is located at the interface between communities to facilitate access across a number of neighbourhood areas and greater integration between communities and to support the provision of community facilities which act as point of integration between residents of new and established communities within neighbourhoods.”*

Development Compliance: The development caters for community infrastructure which are considered to complement the existing range of facilities in the area. The proposed non-residential uses are located at ground floor level of the blocks and front onto both Santry Avenue and Swords Road and therefore will act as point of integration between residents of new and established communities.

Policy SN17 - *“To facilitate the provision in suitable locations of sustainable, fit-for purpose childcare facilities in residential, employment and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area.”*

Development Compliance: A childcare needs assessment has been undertaken and forms part of the Social & Community Infrastructure Assessment which accompanies the application as a separate document. With regard to the provision of existing facilities in the immediate catchment area and the expected demand to be generated by the development, it is considered that the demand for childcare spaces can be catered for by existing facilities within the catchment area of the site. For full details please refer to the Social & Community Infrastructure Assessment.

- **Objective SN18** - *“To encourage and facilitate the provision of a range of community facilities in the city that caters for all.”*

Development Compliance: Please refer to the enclosed Social & Community Infrastructure Assessment, which accompanies the application as a separate document, detailing the existing services and facilities serving the area. In addition, the development provides for community, commercial/retail, and residential amenity use, units for the use of both future residents and, where applicable, the wider community.

- **Objective SN19** - *“To enhance and improve the provision of playgrounds, play spaces, playing pitches and recreational spaces in residential areas and in the city centre in accordance with the City Council’s standards and guidelines.”*

Development Compliance: Recreational spaces are proposed for the residents of the development in accordance with the CDP / Apartment Guidelines objectives, including the provision of 13% public open space on site (in addition to an ample provision of communal open space).

6.17. Development Standards: Design, Layout, Mix of Uses and Sustainable Design

- 6.17.1. Chapter 16 of the CDP *‘Development Standards: Design, Layout, Mix of Uses and Sustainable Design’* sets out the minimum standards for new developments. It is considered that the development fully complies with the development management standards of the CDP and, where applicable, the superseding Section 28 Ministerial Guidelines such as the NPF, the E&MRSES, UD&BHG, and the Apartment Guidelines.



6.17.2. Compliance with the standards contained in Chapter 16 of the CDP have largely been discussed in previous sections of this statement i.e. in relation to Public Open Space, Communal Open Space, Density, Plot Ratio & Site Coverage, Building Height, Standards for Residential Accommodation in Apartment Schemes, and car & bicycle parking.

6.17.3. It is considered that the entirety of this statement demonstrates the high quality standard of the proposed development, and that the development fully supports the qualitative and quantitative standards of the CDP.

6.18. Part V – Social Housing

6.19. The CDP identifies in Policy QH3 that Dublin City Council aims:

‘To secure the implementation of the Dublin City Council Housing Strategy in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/ or affordable housing in order to promote tenure diversity and a socially inclusive city.’

Development Compliance: The development has been designed in a manner to ensure an appropriate mix and location of Part V units. This has been discussed with Dublin City Council and agreed as an acceptable proposal in principle. The applicant has met with the Housing Department of Dublin City Council to discuss the provision of social housing units within the development and we enclose the Part V proposals and letter of validation from DCC Housing Department with this application.

7.0. Draft Dublin City Development Plan 2022-2028

7.1. The Draft Dublin City Development Plan 2022-2028 is currently being prepared. The draft consultation ended on the 14th February 2022. The Draft Dublin City Development Plan 2022-2028 sets out policies and objectives to guide how and where development will take place in the city over the lifetime of the Plan. The proposed development site is proposed to maintain the zoned objective ‘Z3’ which aims “to provide for and improve neighbourhood facilities”. Under this land use zoning objective, the CDP states that “these are areas that provide local facilities such as small convenience shops, hairdressers, etc. within a residential neighbourhood. They can form a focal point for a neighbourhood and provide a limited range of services to the local population, within 5 minutes walking distance. These centres provide an essential and sustainable amenity for residential areas and it is important that they should be maintained and strengthened where necessary. In addition, neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level.”

7.2. Please refer to the accompanying ‘Statement of Compliance with the Draft Dublin City Development Plan 2022-2028’, prepared by Armstrong Fenton Associates which details how the proposed development complies with the Draft Plan.



8.0. Conclusions of Statement of Consistency

- 8.1. This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning & Development Consultants, on behalf of Dwyer Nolan Developments Ltd. (the applicant) to accompany the application for Strategic Housing Development (SHD) submitted to An Bord Pleanála in respect of lands located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.
- 8.2. In accordance with Section 8(1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, this Statement of Consistency has detailed how the proposed development is consistent with the objectives of the relevant planning policies pertaining to the development site at local, regional, and national level.
- 8.3. This Statement of Consistency has considered the following policy documents:

National Planning Context

- The National Planning Framework (2018):
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016):

Section 28 Ministerial Guidelines

- Urban Development and Building Heights Guidelines for Planning Authorities (2018):
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018, as amended):
- Guidelines for Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual - A Best Practice Guide (2009):
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007):
- Childcare Facilities: Guidelines for Planning Authorities (2001):
- Design Manual for Urban Roads and Streets (2013, as amended):
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009):
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009 as amended):
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018):

Regional Planning Context

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (2019):
- The Transport Strategy for the Greater Dublin Area 2016-2035:

Local Planning Context

- Dublin City Development Plan 2016-2022.
- Draft Dublin City Development Plan 2016-2022.

- 8.4. Having regard to all the foregoing contained in this Statement of Consistency, it is considered that the proposed development is appropriate to the subject site. The proposed redevelopment of the site in Santry represents an opportunity to deliver a residential development offering a quality living environment, respectful of its context, site topography, and site character, while making efficient use of land which is in close proximity adjacent to the high frequency public transport. It is considered that the proposed development is fully in accordance with recent Government guidance in relation to the delivery of new apartment developments, supports the objectives of the



CDP, national and regional policy, and represents the proper planning and sustainable development of the area.

