

**PLANNING APPLICATION**  
**UNDER SECTION 175 OF THE PLANNING &**  
**DEVELOPMENT ACT**  
**PLANNING REPORT**  
**FOR LANDS REFERRED TO AS CHURCH FIELDS EAST, DUBLIN 15**

**BSM**

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**Brady Shipman  
Martin**

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CLIENT  
**Fingal County Council**

DATE  
**June 2023**

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## 1 INTRODUCTION

This application for approval is made by Fingal County Council under Section 175 of the Planning and Development Act 2000, as amended. Provisions for developments by a Local Authority are provided for under Section 175 where an EIAR is prepared. This Planning Report has been prepared to accompany this Planning Application.

The subject application site (hereafter called 'the site') is located in an established urban area located on lands zoned 'RS' Residential in the Fingal Development Plan 2023-2029, in the townland of Blanchardstown-Tyrrelstown in the north-west of the Dublin Metropolitan Area (DMA), Dublin 15. The site has a total gross site area of c.5.52 ha and a residential gross density of c. 39.3 units per hectare.

The north of the site is bound by Damastown Avenue; to the east by Church Road; to the south by a permitted linear park and existing residential area of Wellview; and to the west by permitted Part 8 development by Fingal County Council for 300 no. dwellings, a creche, a communal facility and 2 no. retail units (FCC Reg. Ref. PARTXI/01/21). See Fig. 1.1 below.

The proposed development, as per the statutory notices, will comprise of:

*The proposed development seeks the construction of 217 no. residential units, consisting of 121 no. houses and 96 no. apartments, ranging from 2 – 4 storeys in height, in a mixed tenure development. The development is set out as follows:*

1. *The construction of:*

- *121 no. two and three storey houses (34 no. 2 beds, 76 no. 3 beds, & 11 no. 4 beds);*
- *3 no. four-storey apartment blocks with balconies on all elevations, green roofs, and external amenity courtyards, providing a total of 96 no. units (36 no. 1 beds, 56 no. 2 beds, & 4 no. 3 beds)*

2. *Landscape works including:*

*(a) provision of Class 2 open space of 7,600 sqm, private communal open space of 725 sqm, playgrounds and kick about areas;*

*(b) new pedestrian and cycle connections to Damastown Avenue to the north; to the new Church Fields footpath cycleway to the east; and to the linear park to the south; and*

*(c) a new pedestrian connection to Church Road and to Mulhuddart Cemetery on Church Road*

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3. 306 no. car parking spaces (263 no. residential and 43 no. visitor spaces), including 15 accessible spaces; and 897 no. bicycle parking long term and short term spaces, including 6 no. external bike stores providing 300 bicycle spaces for the apartments, and 16 no. free-standing bike bunkers accommodating 96 no. bicycle spaces for mid-terrace houses.
4. A temporary construction access to the site from Damastown Avenue;
5. Associated site and infrastructural works include provision for water services, foul and surface water drainage and associated connections to the permitted Church Fields Housing and Eastern Linear Park scheme (as permitted under Plan Reg. Ref.: PARTXI/012/21); and Sustainable Drainage Systems, including permeable paving, green roofs and swales. The proposed development includes for proposed surface water drainage which is amended from that permitted under Church Fields Housing and Eastern Linear Park development.
6. The proposed application includes all site enabling and development works, landscaping works, PV panels, bins stores, plant, storage, boundary treatments, ESB substations, lighting, servicing, signage, and all site development works above and below ground.

Fingal County Council has carried out an Appropriate Assessment (AA) Screening Report and has determined that a full Natura Impact Statement (Appropriate Assessment) is not required in respect of this proposed development. An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the proposed development.

This Planning Report should be read in accordance with all other plans and particulars including:

- Architectural Drawing Pack prepared by Walsh Associates;
- Architectural Design Statement prepared by Walsh Associates;
- Housing Quality Assessment prepared by Walsh Associates;
- Schedule of Accommodation & Areas Summary prepared by Walsh Associates;
- Building Life Cycle Report prepared by Walsh Associates;
- Appropriate Assessment Screening Report prepared by Brady Shipman Martin;
- Environmental Impact Assessment Report (EIAR) prepared by Brady Shipman Martin;
- Preliminary Construction Environmental and Waste Management Plan (CEMP) prepared by Brady Shipman Martin;
- Social Infrastructure and Childcare Demand Report prepared by Brady Shipman Martin;
- Landscape Design Statement prepared by Brady Shipman Martin;
- Landscape Drawing Pack prepared by Brady Shipman Martin;
- Photomontages prepared by Brady Shipman Martin;

- Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers;
- Engineering Services Drawing Pack prepared by Waterman Moylan Consulting Engineers;
- Site Specific Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers;
- Surface Water Management Plan prepared by Waterman Moylan Consulting Engineers;
- Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers;
- DMURS Statement of Consistency prepared by Waterman Moylan Consulting Engineers;
- Travel Plan prepared by Waterman Moylan Consulting Engineers;
- Stage 1 Road Safety Audit prepared by Bruton Consulting Engineers;
- Ground Investigation Report prepared by Ground Investigations Ireland
- Waste Classification Report prepared by Ground Investigations Ireland
- Daylight/ Sunlight Assessment prepared by Waterman Moylan Consulting Engineers
- Climate Action Energy Statement prepared by Waterman Moylan Consulting Engineers
- Operational Waste Management Plan prepared by AWN Consulting Ltd.
- Resource & Waste Management Plan prepared by AWN Consulting Ltd.
- Tree Survey & Planning Report and associated drawings prepared by Independent Tree Surveys Ltd.

This planning application is made in accordance with the *Planning and Development Act 2000* (as amended) and the *Planning and Development Regulations 2001-2023*. We confirm that prior to making this planning application the drawings enclosed herewith have been checked with reference to the *Planning and Development Regulations 2001-2023*.

## 1.1 Engagement Throughout the Planning Application Process

### Pre-Planning Engagement

Fingal County Council worked closely with the Design Team throughout the pre-application stage of this significant public housing project. Extensive engagement took place with the various departments of Fingal County Council, including Architects, Planning, Housing, Drainage, Transport, Parks & Landscape.

### Public Display / Consultation

The complete planning application is displayed for public consultation on <https://consult.fingal.ie/en/consultation/S175-church-fields-east> and will be live throughout the public observation period from 7<sup>th</sup> June – 20<sup>th</sup> July (not being less than 6 weeks).

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In accordance with s175(4)a of the Planning and Development Act (as amended), a newspaper notice was published in The Herald on 7<sup>th</sup> June 2023 inviting the public to make a submission and observation to An Bord Pleanála within a period of not less than 6 weeks.

As illustrated on the Site Location Map prepared by Walsh Associates (Dwg No. P-001), there are a total of 5 no. Site Notices displayed at publicly accessible locations around the site.

#### Consultation with Prescribed Bodies

In accordance with s175(4)b of the Planning and Development Act (as amended), a total of 14 no. Prescribed Bodies were consulted prior to lodgement and all received either a hard or soft copy of all plans and particulars, including the Environmental Impact Assessment Report. The following Prescribed Bodies were invited to make an observation and submission to An Bord Pleanála:

- Department of Housing, Local Government and Heritage (Development Applications Unit)
- Department of Communications, Energy and Natural Resources
- An Chomhairle Ealaíon (the Arts Council)
- Environmental Protection Agency
- Fáilte Ireland
- The Heritage Council
- Inland Fisheries Ireland
- An Taisce —the National Trust for Ireland
- Irish Water
- Health and Safety
- Irish Aviation Authority (IAA)
- Dublin Airport Authority (DAA)
- National Transport Authority (NTA)
- Transport Infrastructure Ireland (TII)

## 2 SITE LOCATION AND CONTEXT

### 2.1 Site Location

The subject site is located in the townland of Tyrrelstown, north of Blanchardstown, and has a total site area of c.5.52ha. (See Fig. 2.1 below).

The north of the site is bound by Damastown Avenue. Permission has been granted and work is currently underway on improvements to the footpath and cycling network along Damastown Avenue (FCC. Reg. Ref. PARTXI/011/19), which will improve connectivity from the application site to surrounding facilities, particularly to the educational facilities to the north. This approved scheme also includes road access from Damastown Avenue which will serve the application site.

The east of the site is bound by Church Road, with Mulhuddart Cemetery opposite. St. Mary's Church, listed in the Fingal County Council Record of Protected Structures (RPS No. 670), is located to the southeast of the site.

The south of the site is bound by the residential areas of Wellview and Avondale further beyond, and by a permitted linear park (FCC Reg. Ref. PARTXI/012/21). This Approval was granted under Part XI of the Planning and Development Act 2000 (as amended) to include for upgrades to Wellview Park, and the delivery of the linear park (as referenced above), which is currently under construction.

The west of the site is bound by a permitted Part 8 development by Fingal County Council for 300 no. dwellings, a creche, a communal facility and 2 no. retail units, (FCC Reg. Ref. PARTXI/01/21). (See Fig. 3.1 below).

Further lands to the west are in the ownership of Fingal County Council, which will be subject to a future planning application as part of the wider Church Fields development (See Walsh Associates Design Statement for Church Fields Design Concept Plan and Fig. 2.2 below).



Figure 2-1 Site Context with Indicative Subject Site (Source: Walsh Associates 2023).

## 2.2 Overall Context of FCC Lands and the Subject Site

The application site forms part of a strategic landholding in the ownership of Fingal County Council (FCC) and plays a significant role in the delivery of housing within the Metropolitan area of Dublin providing a mix of social and affordable housing. FCC are committed to delivering a sustainable community on these lands and have submitted a number of applications within recent years.

Approval has already been granted for a residential development to the west of the site which includes 300 residential units, a childcare facility, community facility and 2 retail units (PARTXI/01/21).

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Lands further west are also within the ownership of FCC and will be subject to future applications. The long standing, established residential areas of Wellview, Avondale and Parlickstown are located to the south.

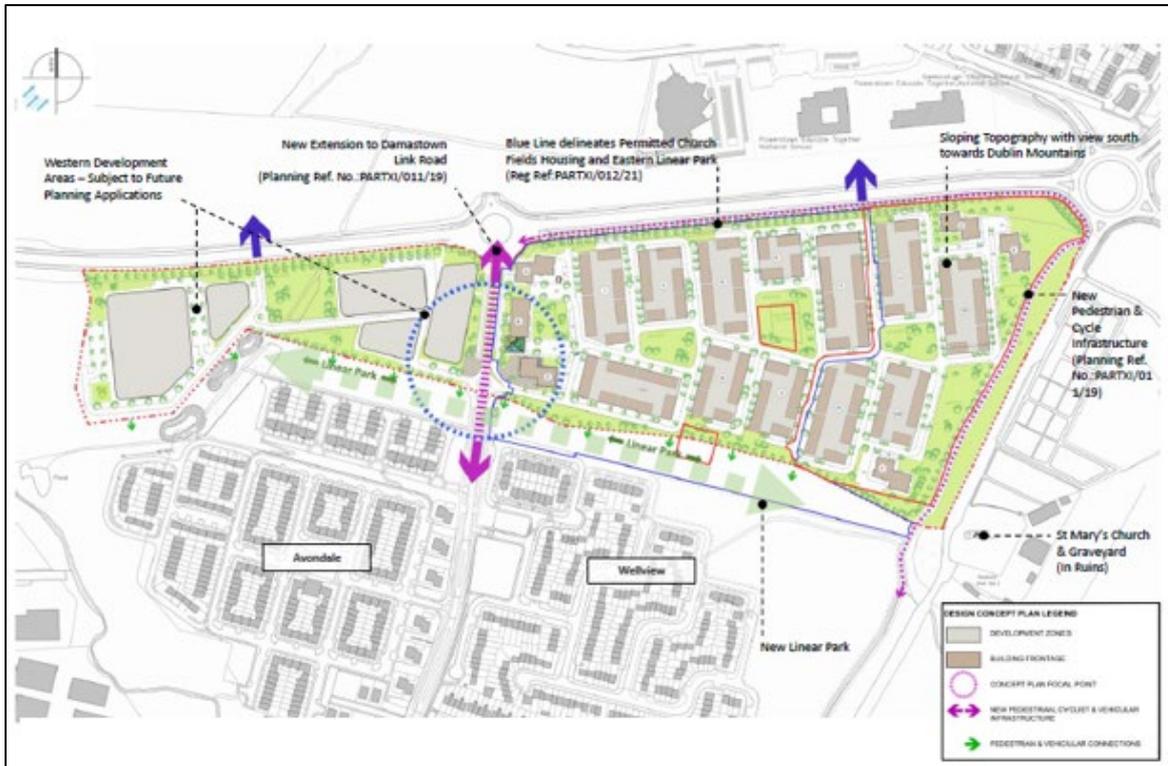


Figure 2-2 Church Fields Design Concept Plan (Source: Walsh Associates 2023).

The overall lands at Church Fields, including the subject site, has capacity to deliver approximately 1,000 homes, creche facilities, community facilities, retail space, parks and landscape, and road infrastructure.

#### Wider Area

The subject site is located in the townland of Tyrrelstown, an existing urban area in the north-west of the Dublin Metropolitan Area (DMA) and is c.11km from Dublin City Centre. The lands at Church Fields are located between Mulhuddart Village (c.1.3km to the south) and Tyrrelstown (c.1.5km to the north), both existing urban areas connected by Church Road. Mulhuddart has a wide offering of local services including retail, services, religious, and the Mulhuddart Community Centre, while Tyrrelstown is served by a local centre. (See Fig. 2.1 above).

Within the wider area there is a strong presence of employment, education and residential uses.

Directly north of the subject site there are 2 no schools, namely Powerstown Educate Together National School and Gaelscoil an Chulinn. A further 3 no. schools are located within Tyrrelstown further north, within 1.2km of the subject site (Le Cheile Secondary School, St. Luke's National School and Tyrrelstown Educate Together National School). TU Dublin Blanchardstown Campus is located to the southeast of the subject site. The 22.5 ha campus is located within the IDA College Business Technology Park and comprises university buildings and sporting facilities.

The Dublin 15 Strategic Development Area and the Dublin Enterprise Zone are located to the east and continues to develop and attract world leading businesses including PayPal, IBM and Westpharma. Housing delivery in this area is crucial as the DEZ has a population of 100,000 people and is a national economic asset that is home to over 800 businesses and the potential for up to 20,000 no. jobs within the Dublin 15 Strategic Development Area.

The area is currently served by public transport with the closest bus stops to the subject site approximately 9 – 10 minutes' walk from the centre of the site. The proposed Bus Connects scheme includes a new route (B3 – Tyrrelstown – City Centre – Dun Laoghaire) which will run along Church Road which will enhance accessibility and connectivity to the site. (See Fig. 4.1 and 4.2 below).

The site therefore benefits from physical, social, and transport infrastructure which is in place or is in the process of being delivered so that it will be in place prior to construction and occupation of the proposed development. This ensures that a holistic approach is being taken to the development of the site and the future community in this area.

### **3 PLANNING HISTORY REVIEW**

A review of the planning history shows no recent applications on the subject site. The red line boundary partially overlaps with the permitted Part 8 development to the west (FCC Reg. Ref. PARTXI/012/21) to facilitate completion of landscaping, road tie-ins and junction configurations.

Within recent years there has been significant planning activity within the wider area including education facilities, religious facilities, residential development and road, cycle and pedestrian infrastructure.

Significant residential applications relevant to the subject application are summarised below:



Figure 3-1: Summary of the Planning History in the Wider Area (Source: BSM 2023).

### 3.1 FCC Reg. Ref. PARTXI/001/22

Fingal County Council (Architects Department) applied for permission at Wellview Park, Wellview Green and Wellview Terrace comprising of rejuvenation and upgrade Wellview Park and two existing areas of public realm in Wellview Green and Wellview Terrace.

Works included pedestrian access points, footpath upgrades, paving and associated drainage works and planning permission was granted on 10<sup>th</sup> October 2022.

### 3.2 FCC Reg. Ref. PARTXI/012/21

Fingal County Council (Architects Department) applied for permission at Church Fields, Mulhuddart, Dublin 15 for a Part 8 development comprising 300 no. dwellings, 1 no. creche facility, 1 no. communal facility, 2 no. retail units and an Eastern Linear Park and all associated site development works on a total site of 9.47ha.

The development in accordance with Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) was granted planning permission on 14<sup>th</sup> March 2022 and is currently under construction (to the west of the subject site).

### **3.3 FCC Reg. Ref. PARTXI/010/19**

Fingal County Council applied for permission at Church Fields, Mulhuddart, Dublin 15 for a Part 8 development comprising 70 no. dwellings, a total of 136 no. car parking spaces and all associated site development works to the west of Avondale (to the southwest of the subject application area).

This development in accordance with Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) was granted planning permission on 10<sup>th</sup> February 2020.

This development is currently under construction.

### **3.4 FCC Reg. Ref. PARTXI/011/19**

Fingal County Council applied for permission for a Part 8 development consisting of a new link road from the existing roundabout on Damastown Avenue connecting to Wellview Avenue, a new combined cycle track and footway along Damastown Avenue and through the future parkland area adjacent to Church Road, and a new cycle route from Damastown Avenue/ Church Road to Powerstown Educate Together National School, located on Powerstown Road.

Planning was approved and the link road is currently under construction. Vehicular access to the site subject of this application will be provided via this development.

### **3.5 FCC Reg. Ref. PARTXI/006/18**

Fingal County Council applied for permission for a Part 8 development consisting of 20 no. 2-storey 2, 3 and 4 no. bedroom houses and a total of 44 no. car parking spaces.

The development in accordance with Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) was granted planning permission on 8<sup>th</sup> April 2019 and is currently under construction (to the south of the subject site).

This development is referred to as Wellview, with construction anticipated to begin in late 2023.

## **4 PLANNING POLICY CONTEXT**

### **4.1 Compliance with National & Regional Planning Policy**

The key provisions of national (including relevant Section 28 Guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Affordable Housing Act 2021

- Housing For All – A New Housing Plan for Ireland (2021);
- Rebuilding Ireland – Action Plan for Housing and Homelessness (2016);
- Project Ireland 2040 - National Planning Framework (2018) ;
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy 2019-2031 (RSES) (2019);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas , and the accompanying Urban Design Manual(2009);
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities;
- Sustainable Urban Housing: Design Standards for New Apartments (2022);
- Design Manual for Urban Roads and Streets (2019);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018);
- Transport Strategy for Greater Dublin Area 2022-2042;
- The Planning System and Flood Risk Management (2009);
- Birds and Habitats Directive – Appropriate Assessment (92/43/EEC)
- EIA Directive (2014/52/EU).

#### 4.1.1 Affordable Housing Act 2021

The Affordable Housing Act 2021 provides for the following:

- The provision of dwellings for the purpose of sale under affordable dwelling purchase arrangements;
- To provide for the provision by housing authorities of financial assistance to purchase dwellings under affordable dwelling purchase arrangements;
- To provide for dwellings to be made available on a cost rental basis;
- To provide for funding to be made available for the purchase of dwellings in accordance with a scheme of shared equity.

The proposed development provides for a total of 217 no. units comprising 96 no. apartments and 121 no. houses in a mixed tenure scheme.

#### 4.1.2 Housing for All – A New Housing Plan for Ireland 2021

*Housing for All*, published in September 2021, is the Government’s new housing plan to 2030. It provides an overview of the existing housing scenario as it follows:

- There are not enough houses being built by the State for those who need social housing.
- Housing has become increasingly unaffordable for the ‘squeezed middle’ who would once have expected to be able to purchase their own home.
- Too many people are experiencing homelessness or are unable to access appropriate housing.
- The cost of building housing is too high.
- Too much vacant housing stock remains unused.
- Our housing stock needs to be more environmentally friendly.

The plan provides for the following key targets / actions, among others:

- Increased supply of new housing overall, up to an average of at least 33,000 per year to 2030.

- An average of 6,000 affordable homes to be made available every year for purchase or for rent.
- Provision of more than 10,000 social homes each year, with an average 9,500 new-build Social Housing Homes to 2026.
- Increased contribution by developers under Part V, up from 10% to 20%, to include affordable housing and cost rental housing.

The estimates of housing demand which form the basis of the Housing for All plan's targets have been developed by the Department of Housing, Local Government and Heritage (DHLGH)'s Housing Need and Demand Assessment (HNDA) model, which has been adapted from the Scottish HNDA.

The proposed development is consistent with the Government's new *Housing for All* plan and will provide a total of 217 no. new high-quality homes on lands zoned for residential development, in accordance with Government housing policy, providing a mixed tenure residential development.

In particular, the proposed development delivers both social and affordable housing contributing to the achievement of the targets set out in 'Housing for All'.

#### 4.1.3 Project Ireland 2040 National Planning Framework

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

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

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of Ireland out to the year 2040.

The NPF identifies that by 2040 it is expected that an additional one million people will live in Ireland, an additional two-thirds of a million people will work here. These are huge increases: more people will be travelling to work, school and universities, more buildings will be needed to accommodate them, clean water will be needed for homes, farms and industry, more and better care facilities will be required for the elderly.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating 'strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development' as a top priority. Policies within the NPF are structured under National Policy Objectives (NPOs). These objectives promote coordinated spatial planning, sustainable use of resources, protection of the environment and the Natura 2000 network. With regard to sustainable communities the NPF sets out the following NPOs:

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 11:

*"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."*

The NPF requires homes to be located in places that can support sustainable development. This includes places that are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change.

The proposed development is consistent with the objectives of the NPF in that it will deliver a high-quality residential development within the Dublin Metropolitan area, in an established urban residential area. The proposed development will be delivered on lands in the ownership of Fingal County Council that have been identified by Fingal County Council for residential development of this nature.

While the lands subject of the application are currently undeveloped, they abut established residential developments within the existing built up area of Damastown and Mulhuddart. This area is accessible to local services in Mulhuddart and Tyrrelstown, can avail of pedestrian and cycle networks in the area and existing and planned improvements to public transport. Therefore, the development of the lands would be consistent with the housing aims of the NPF, National Policy Objective 4 and would deliver a well-designed and sustainable community.

The proposed development will provide a mix of units in terms of housing typology and tenure, at a density and massing that are in-line with the existing and proposed development pattern along Damastown Avenue including permitted Part 8 developments by Fingal County Council that are currently under construction.

#### 4.1.4 Eastern and Midland Regional Assembly – Regional Spatial & Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region 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 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’.*

The Strategy is underpinned by key principles that reflect the three pillars of sustainability: Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The Strategy identifies that the central need is for the RSES to be people focussed, as ‘quality of life’ encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located within the Dublin Metropolitan Area, as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion. Blanchardstown is located in the North-West Corridor of the MASP.

Policy Objectives relating to Housing Delivery include:

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

As well as calling for increased residential density in the Dublin Metropolitan Area, the RSES emphasises the need for healthy placemaking, i.e. *“integration of better urban design, public realm, amenities and heritage to create attractive places to live, work, visit and invest in”* and *“sustainable communities to support active lifestyles including walking and cycling”*.

The proposed development provides a high quality design in both architectural and urban design terms, provides for enhanced connectivity in the area and promotes walking and cycling. Features proposed as part of the development include a high quality public realm incorporating soft landscaping, cycle lanes and secure bike parking facilities.

The proposed development has an overall density of c.39.3 units per hectare in accordance with the recommended density of 35-50 dwellings per hectare on outer suburban/ greenfield sites as set out in the Guidelines for Planning

Authorities on Sustainable Residential Development in Urban Areas (2009) – see below.

The density of the site has taken cognisance of the permitted development to the west, and to the site context. The application site, particularly when considered with the permitted scheme to the west, is of sufficient scale to determine its own sense of identity in this area. The design of the scheme has specifically evolved to take cognisance of this and ensure that the area presents its own character.

#### **4.1.5 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).**

The aim of these guidelines is to set out the key planning principles which should guide the delivery of residential development in urban areas. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed in the section below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

These guidelines establish core principles of urban design, with a view to creating urban places of high quality and distinct identity. They recommend that planning authorities should promote high quality design in their policy documents and in their development management processes. The Guidelines are accompanied by an Urban Design Manual, which is discussed in relation to the proposed project in the following section.

The Guidelines reiterate the need for compact urban residential development expressed in the NPF:

*“... planning authorities should promote increased residential densities in appropriate locations, including city and larger town centres (defined for the purposes of these guidelines as towns with 5,000 or more people). This recommendation was based on three significant social, economic and environmental considerations, namely:*

- *The trend towards smaller average household sizes,*
- *The need to encourage the provision of affordable housing,*
- *Particularly in the greater Dublin area, and*
- *The need to reduce CO2 emissions by reducing energy consumption and to support a more efficient use of energy in the residential and transport sectors, in line with Ireland’s commitments under the Kyoto Protocol.”*

Section 5.11 of the Guidelines promotes a net residential density range in the order of 35-50 dwellings per hectare for ‘Outer Suburban/Greenfield sites’. The proposed development achieves a density of 39.3 units per hectare and is therefore in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

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

As outlined above, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) are accompanied by a Design Manual which considers how design principles can be applied in the design and

layout of new residential developments, at a variety of scales of development and in various settings.

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. The Fingal Development Plan 2023-2029 also sets out at Objective DMSO5 that these guidelines should be considered for all large scale residential planning applications.

The scheme is considered against these criteria below and also in the Architects Design Statement prepared by Walsh Associates Architects.

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

The proposed development responds to various site constraints and opportunities including the the opportunity to improve connectivity for the surrounding area, with the new pedestrian/cycling routes surrounding the site, that link into the wider existing and emerging active movement network, with good access to existing local services, schools and public transport, reducing the need to use private vehicles, and allowing for appropriate increased density.

Higher density is strategically located throughout the site looking onto landscape areas while respecting the height and scale of the existing and proposed context.

The overall design responds to specific boundary treatments including the frontage onto Church Road where the permitted new Cycle Path will be overlooked by the proposed development, and the Linear Park to the south will receive a new building line, providing a sense of enclosure and definition.

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

The proposed development provides attractive routes for pedestrian and cyclists connecting to the surrounding movement network and green infrastructure. This ensures the site is easily accessed on foot or by bicycle.

The site is identified as having good proximity to main public transport services, local services, employment and mixed use centres. All connections promote sustainable travel to the surrounding area and will be designed with good lighting to ensure active surveillance and sense of security.

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

The proposed development has been designed to enable easy access for all in accordance with universal design principles and standards. Houses and apartments are sized for life-long living and can be readily adapted for future needs.

Public spaces consider the different needs of users in the public space which complies with universal access design and building regulation standards (Part M).

For further details on accessibility please refer to the Architectural Design Statement prepared by Walsh Associates and the Landscape Design Statement prepared by Brady Shipman Martin.

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

The proposed development contributes to the locality through the provision of a broad mix of unit types. Public open spaces are in desirable places and are well accessed with active overlooking ensuring a safe environment.

The open space and play activities within the residential development are designed to serve and complement residential uses and to minimise noise and disruption for surrounding existing residents.

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

The development provides efficient land use in a suburban location. Introducing high quality development within close proximity to public transport and good pedestrian and cycle links. Higher density elements of the proposed development are strategically located towards the eastern edge of the site.

Existing landscape will be protected and enhanced as part of the new development, with particular care taken to enhance the mature stand of trees along Church Road. The overall landscape strategy is designed to provide amenity for residents and will encourage biodiversity and Sustainable Urban Drainage Systems (SuDS) features.

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

The proposed development responds to surrounding historic sites including St. Mary's Church and mature landscape along Church Road creating a sense of place within the wider context of the area. The proposed development respects and responds to landscape elements, referencing them as recognisable features and providing people with a link to the area's history.

The design maintains the unique architectural and environmental features of the site while adding contemporary design for the residents and neighbours and enhancing the sense of place.

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

Proposed routes within the development are designed primarily as 'places for people' and active movement with gentle gradients and attractive paving. Houses are orientated to the main routes and pocket parks throughout, creating active streetscapes and providing overlooking into communal open space.

Trails and other amenities within the proposed development are proposed around the buildings providing active, attractive, legible people-friendly places in a high quality landscaped setting.

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

All areas of open space are directly overlooked and easily accessible creating a strong relationship between the dwellings and public realm. A user-centred approach in terms of layout, landscape design, materials and details that are inviting for residents to use, will generate high levels of activity and natural surveillance.

Private and semi-private areas around buildings are well delineated in terms of planting, paving and boundary treatment. Vehicular access areas are

minimised, and the layout has been designed to allow priority to pedestrian and cyclists in accordance with DMURS.

***9) Adaptability – how will the buildings cope with change?***

The structural design and floor levels of the development are designed to allow for future change and adaptability over time. Both houses and apartments have been designed and assessed against the criteria set o by the Joseph Rowntree Foundation’s Healthy Age Friendly Homes Programme. Please refer to the Architectural Design Statement prepared by Walsh Associates for further details.

The internal walls of the apartments will be designed to be non- structural, allowing the option for reconfiguration of the space depending on the resident’s requirements (office, playroom, etc.), while the party walls will be designed with ‘soft zones’ to allow smaller apartments to be combined without affecting structural integrity.

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

All apartments have been designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2022. Houses have been designed in accordance with the policies and objectives of the Fingal Development Plan 2023-2029.

All apartments have internal storage and private open space in the form of balconies and terraces, with external storage for bulky items provided in the communal lobby of each apartment building.

Houses have adequately sized gardens which provide for bin storage and bicycle storage defined by high quality planting and fencing to ensure privacy.

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

The proposed development will include for c. 306 no. car parking spaces and c. 897 no. cycle parking spaces.

Residents ‘long-stay’ bicycle parking facilities are located externally close to apartments and are overlooked for surveillance, space for cargo bikes and e-bike charging points are also provided.

Car parking is provided on street or within designated car parking areas adjacent to apartment blocks, 20% of car parking spaces are provided with EV infrastructure whilst all other spaces will be future proofed.

Accessible car parking spaces are located close to apartment entrances and accessible housing units.

Both bicycle and car parking areas are designed to meet high standards and to integrate with the proposed landscape design of the public space.

***12) Detailed Design – How well through is the building and landscape design?***

The materials and external design of the buildings and landscape are all designed to make a positive contribution to the locality as a high quality, attractive place for people to live.

The landscape elements have been designed for residents to enjoy, with spaces for people to come together. The building detail design, materials and finishes have all been selected to facilitate safe, easy and regular maintenance. The accessible car parking spaces, bicycle parking enclosures and bin storage areas have been designed as an integral part of the landscape.

Please refer to the Landscape Design Statement prepared by Brady Shipman Martin and the Architectural Design Statement prepared by Walsh Associates for further details.

#### 4.1.7 Sustainable Urban Housing: Design Standards for New Apartments (2022)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in 2020, and in December 2022.

The Guidelines set out specific planning policy requirements (SPRRs), which planning authorities must apply, *'notwithstanding the objectives and requirements of development plans, local area plans and SDZ planning schemes'*.

The Guidelines note that the NPF projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities and of particular relevance to this site it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

The 2018 Guidelines updated the previous 2015 Guidelines to amend and address new areas including:

- *Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *Make better provision for building refurbishment and small-scale urban infill schemes;*
- *Address the emerging 'build to rent' and 'shared accommodation' sectors; and*
- *Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.*

The most recent update of the Guidelines published in December 2022 concluded significant changes on Build to Rent (BTR) developments. Whilst not removing BTR completely, it has been disregarded as a distinct development type and all design standards must be in accordance with Appendix 1 of the Guidelines, as per all standard apartment development.

There are no other significant changes to the Guidelines and references have been updated where applicable, including the provision for daylight & sunlight assessment. Updated legislation in which daylight & sunlight should be assessed against now includes 'A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022).

With regard to the above, the proposed development will include for a total of 96 no. apartments designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments (2022).

#### **4.1.8 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)**

The Urban Development and Building Height Guidelines identify that as reflected in the *'National Planning Framework ... that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas'* and that *'securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'*.

The Guidelines reference NPO 13 (from the NPF) which states that *'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'*.

Heights proposed in the development range from 2-4 no. storeys which effectively integrates with the surrounding and permitted context in accordance with the Urban Development and Building Height Guidelines for Planning Authorities (December 2018).

#### **4.1.9 Design Manual for Urban Roads and Streets (DMURS) (2019)**

*The Design Manual for Urban Roads and Streets (DMURS)*, was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013, and updated in 2019. It 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.

The proposed development is the outcome of an integrated urban design and landscaping approach to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. Waterman Moylan Consulting Engineers alongside the rest of the design team has interrogated DMURS principles to ensure the final layout provides a high quality urban residential area along Damastown Avenue and Church Road. A DMURS Statement of Consistency has been prepared by Waterman Moylan Consulting Engineers and is submitted as part of this planning application.

#### **4.1.10 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020.**

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

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- i) to reduce overall travel demand
- ii) to maximise the efficiency of the transport network
- iii) to reduce reliance on fossil fuels
- iv) to reduce transport emissions and
- v) to improve accessibility to transport

The key targets that the Smarter Travel Policy sets to achieve these goals are:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work. The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

The subject site encourages sustainable and smarter travel by providing high-quality development on greenfield lands in close proximity to public transport options connecting the site to employment areas within Dublin City. In addition, quality cycling facilities are proposed for both residents and visitors, and a strong network of pedestrian and cycle routes connect the proposed development to surrounding community facilities, amenities, educational centres, and residential areas.

The closest bus stops to the subject site are located on the Ladyswell Road (c. 9 min walk) and on the R121 (c. 10 min walk). Both bus stops are served by a number of Dublin Bus and Go-Ahead bus services connecting the subject site to Blanchardstown Centre and Village, Castleknock and Dublin City Centre.

As discussed below, further improvements to the bus network are planned as part of the future Bus Connects Programme.

Please refer to the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers for further details in relation to meeting the smarter travel objectives.

#### 4.1.11 Transport Strategy for the Greater Dublin Area 2022-2042

The Transport Strategy for the Greater Dublin Area 2022– 2042, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- Climate change
- Recovery from the Covid-19 Pandemic
- Development Patterns

- Revitalisation of the City Centre and Town Centres
- Transformation of the Urban Environment
- Ensuring Universal Access
- Serving rural development
- Improving Health and Equality
- Delivery and Implementation of Transport Schemes

The Greater Dublin Area Transport Strategy 2022-2042 is based on national policies and consistent with the National Planning Framework 2040, Regional Spatial and Economic Strategy (RSES) 2020, low carbon legalisation and climate action plans. The potential impacts of the on-going Covid-19 pandemic, beyond the short term, have also been taken in account.

The subject site at Church Fields will benefit from the BusConnects programme which redesigns the existing bus network. The site will benefit from Route B3 and L62 from Tyrrelstown Town Centre to Dun Laoghaire and Blanchardstown to Broombridge via Tyrrelstown (c. 950m from the subject site).



Figure 4-1: BusConnects Routes Map (Source: Waterman Moylan Consulting Engineers).

Each service has a frequency between 15-30 minutes on weekdays and a frequency of 15 minutes during peak times.

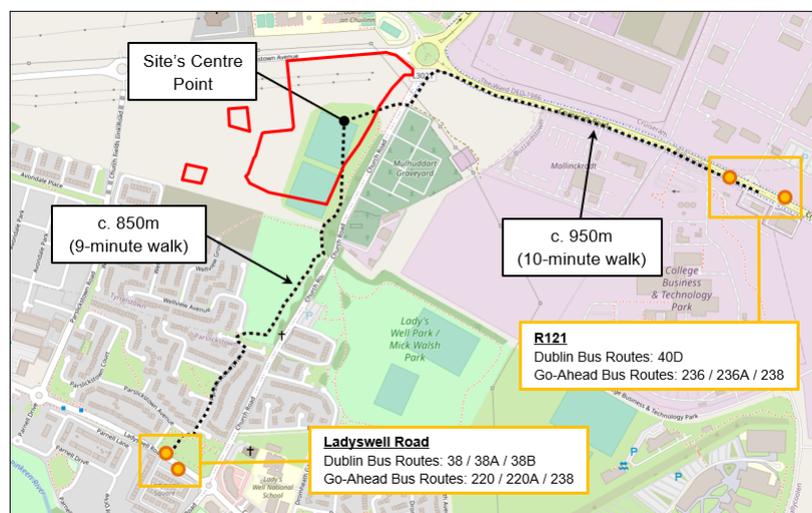


Figure 4-2: Location of Closest Bus Stops and Routes from the Subject Site (Source: Waterman Moylan Consulting Engineers).

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by developing residential development in proximity to existing public transport networks with proposed plans for expansion thereby reducing the requirement on the car and encouraging a shift to more sustainable transport methods.

#### **4.1.12 Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’**

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the Planning System and Flood Risk Management Guidelines a Site-Specific Flood Risk Assessment (SSFRA) has been prepared for the current application by Waterman Moylan Consulting Engineers. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

The SSFRA for the proposed development notes that the subject site is outside of the 0.1% AEP (1 in 1,000) flood event for both fluvial and coastal flooding. Therefore the site can be classified as Flood Zone C and is suitable for residential development.

#### **4.1.13 Birds and Habitats Directive – Appropriate Assessment**

European sites make up a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the “Birds Directive”). The requirements for Appropriate Assessment are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Union (Birds and Natural Habitats) Regulations 2011-2015 (the “Birds and Natural Habitats Regulations”) and the Planning and Development Act, 2000 - 2022 (the “Planning Acts”).

It is necessary to establish whether, in relation to a particular plan or project, Appropriate Assessment is required. Section 177U of the Planning Acts requires that the AA screening test must be applied to the proposed development, as follows:

- To assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the European site;
- An Appropriate Assessment is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a European site.

For further details and conclusions, please see Section 6.1 below, and the Appropriate Assessment (AA) Screening Report prepared by Brady Shipman Martin.

#### **4.1.14 EIA Directive**

The EIA Directive 85/337 EEC, amended three times (in 1997, 2003 and 2009) and subsequently codified by Directive 2011/92/EU, which was itself amended in 2014 by Directive 2014/52/EU (‘the amended Directive’), is the key legislation in

EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex I projects that require a mandatory EIA. Article 4 (2) outlines Annex II projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations.

An EIAR prepared by Brady Shipman Martin has been prepared as part of this application in accordance with the requirements as set out in the EIA Directive, (2011/92/EU), as amended by Directive 2014/52/EU and relevant guidelines and documentation.

## 4.2 Compliance with Local Planning Policy - Fingal Development Plan 2023-2029

This section provides an overview of consistency with local planning policy. The site is located within the administrative area of Fingal County Council and is therefore subject to the land use policies and objectives of the Fingal Development Plan 2017-2023 (the Plan).

The following areas are considered of key relevance:

### 4.2.1 Strategic Vision

The Plan is underpinned by a strategic vision intended to guide the sustainable future growth of Fingal. At the core of the vision is healthy placemaking, building cohesive and sustainable communities, where our cultural, natural and built environment is protected.

The Strategic Vision aims to *“ensure the continued growth of the County in a sustainable way and ensure the County continues to development as a series of well-serviced, well-connected towns, villages and communities and a low carbon economy.”*

Section 1.4 of the Plan sets out the Strategic Policy through a series of 13 no. objectives delivering the main aims of the Plan. In particular, we wish to highlight objective Nos. 2 & 3 in this context which aim to:

#### Objective 2

- *Continue the development of a network of well-serviced, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities.*

#### Objective 3

- *Ensure new residential development is of the highest quality, endorsing the principles of healthy placemaking, enabling life cycle choices and physical,*

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*community, recreation and amenity infrastructure are provided in tandem, to create sustainable, healthy, inclusive and resilient communities.*

The proposed residential development supports the achievement of these objectives, through a development which is of high-quality design providing a mix of tenure promoting social inclusion and contributing to the building of a sustainable community.

The individual design of units and the overall layout of the proposed development adds to the quality of the scheme resulting in a ‘sense of place’ and creates a distinguishable extension to existing and permitted developments on Damastown Avenue.

#### 4.2.2 Land Use Zoning

The subject site is zoned ‘RS – Residential’ which has an overall objective to “provide for residential development and protect and improve residential amenity.” The RS land zoning objective “ensures that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”

The vision for residentially zoned lands is to ensure the provision of high quality new residential developments with good layout and design, within close proximity to community facilities, and with an appropriate mix of house sizes, types and tenures.

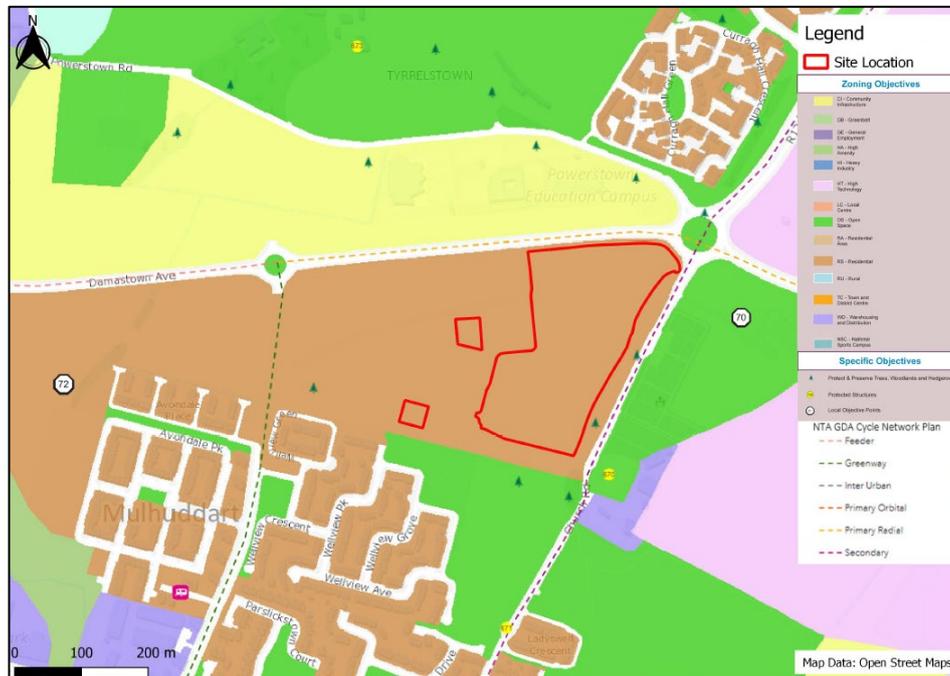


Figure 4-3: Land Use Zoning Map – Indicative Site Boundary Shown in Red (Source: Fingal County Development Plan 2023-2029 Interactive Map)

Uses permitted in principle on ‘RS – Residential’ includes the following:

- Bed and Breakfast
- Education
- Open Space
- Retirement Village
- Utility Installations
- Childcare Facilities

- Guest House
- **Residential**
- Sheltered Accommodation
- Community Facility
- Office Ancillary to Permitted Use
- Residential Care Home/ Retirement Home
- Traveller Community Accommodation

The proposed development is therefore in accordance with the ‘RS – Residential’ land use zoning objective of the Fingal Development Plan 2023-2029.

As illustrated above in Figure 3-1, there is a specific objective to ‘*protect & preserve trees, woodlands and hedgerows*’ to the east and south of the proposed development, located beyond the site boundary. This will remain unaffected by the proposed development.

To the southeast of the subject site there is 1 no. Protected Structure and 2 no. National Monuments including:

Ref Number:	Monument Type:	Description:
RPS No. 670	Protected Structure	Remains of medieval church within walled graveyard that is still in use.
DU013-010001	National Monument	Church
DU013-010001	National Monument	Graveyard

**Table 4-1: Recorded Monuments on Site (Source: Fingal Development Plan 2023-2029 Interactive Map and NIAH Map Viewer).**

Please refer to Chapter 15 ‘Cultural Heritage, Archaeology & Architectural Heritage’ of the Environmental Impact Assessment Report (EIAR) prepared by Courtney Deery for further details. The referenced Protected Structures and Monuments remain unaffected by the proposed development and will not have an adverse impact on their setting.

The subject site is also bound by GDA Cycle Network routes on Damastown Avenue (primary route) and Church Road (secondary route).

### 4.2.3 Core Strategy and Settlement Hierarchy

Chapter 2 of the Development Plan identifies the quantum, location and phasing of development for the plan period that is consistent with regionally defined population targets and settlement hierarchy. It reflects the availability of existing services, planned investment, sequential development and environmental requirements (i.e. an evidence-based approach in determining the suitability of lands for zoning purposes).

The requirement for a Metropolitan Area Strategic Plan (MASP) to be prepared for Dublin as part of the Regional Spatial and Economic Strategy is set out in

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Project Ireland 2040 – National Planning Framework. The MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area.

While the specific area of Mulhuddart (Damastown Avenue) is not specified within the Core Strategy, it is located in the Metropolitan consolidated Town associated with Blanchardstown, for which a capacity of 5,742 no. units is identified (Table 2.10). These villages are considered distinctive areas that contribute to Blanchardstown’s diversity and vitality.

The Settlement Hierarchy identifies a hierarchy of settlement types within the Metropolitan and Core areas of the county and the appropriate policy for growth within them (see Table 2.20 of the Plan).

Table 2.14 of the Plan below sets out the total land and housing capacity for the 2023-2029 Development Plan. The emphasis of the Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

Core Strategy Areas	Settlement Type	Name	CSO Census Population 2016	Estimated 2023 Population	Estimated 2029 Growth	Estimated 2029 Population	Projected Housing Demand (Units)	Total Available Zoned Residential Land	Total Units / Potential Yields	Lands - With Permission (Extant) - Units
		Blanchardstown - Mulhuddart LEA, includes The Ward, Dubber, Tyrellstown, Mulhuddart, Corduff & Abbottstown	34,420	39,583	3,258	42,841	1,761	90	4,495	917

Figure 4-4: Core Strategy 2023-2029 (Source: Fingal Development Plan 2023-2029 Table 2.14).

We note, Objective CSP1 aims to:

*“Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of Fingal.”*

Objective CSP2 further promotes to support compact growth noting:

*“Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.”*

The proposed development seeks to provide 217 no. residential dwellings on lands zoned for residential use and is therefore consistent with the Core Strategy for 2023-2029 as set out in the Fingal Development Plan 2023-2029.



Figure 4-5: Core Strategy of the Fingal Development Plan (Source: Fingal County Council).

#### 4.2.4 Housing Strategy

The preparation of a Housing Strategy is a mandatory requirement under the Planning and Development Act, 2000 (as amended). The Fingal Strategy for the period 2023-2029 is included as Appendix 1 of the Development Plan.

The provision of a mix and range of housing types is essential to accommodate the housing needs and expectations of the County's residents. Mixed and inclusive communities, which offer a choice of housing and lifestyles, have been proven to provide a number of community benefits.

The following general objectives of the Plan relate to delivering sustainable placemaking and quality homes, as follows:

- *“Promote the compact, consolidated development of our towns and villages to provide for settlements which are sustainable and resilient to climate change.*
- *Deliver successful and sustainable communities through the provision of infrastructure, a range of housing typologies and tenure options, open space, retail, leisure, employment, community, and cultural development supporting the needs of residents, workers, and visitors, whilst conserving our built and natural heritage.*
- *Require that the principle of healthy placemaking underpins the design and functionality of new and expanding communities.*
- *Promote adequate provision and distribution of accessible community infrastructure in Fingal that caters for the needs of our diverse communities.”*

Currently within the administrative area of Fingal there are 6,267 households on the social housing list (as of November 2021). The greatest demand at present is for the Blanchardstown Area (2,625 no. people).

Targets for the delivery of social housing within Fingal are set by the Department of Housing and Local Government. The Housing Strategy notes that all *“building programmes were delayed as a result of Covid-19 with the output of social housing dropping to 50% of the normal level in 2020-2021 (402 and 561 no. units respectively). This requires the targets in 2023-2026 to be elevated and front loaded, in order to bring delivery back on track by 2026.”* A total of 690 no. new homes are to be constructed in Fingal in order to achieve its social housing target.

The proposed development proposes a diverse mix of unit types and sizes consisting of 36 no. 1-bed units, 90 no. 2-bed units, 80 no. 3-bed units and 11 no. 4-bed units creating 217 no. quality homes. Furthermore a variety of tenure types is proposed to be delivered. The proposed development will help achieve the target of 690 no. social homes to be delivered in Fingal within 2023, accounting for 31% of the overall target.

It is submitted that the proposed development is consistent with the objectives and vision of Fingal County Development Plan Core and Housing Strategies, and other relevant provisions as set out further below, and therefore ensuring consistency with National and Regional policy.

#### **4.2.5 Development Management Standards**

The Development Plan (Chapter 14) sets out development management standards and criteria to promote sustainable and efficient development. Objectives relevant to the proposed development are set out below:

### High Quality Urban Design

‘Objective DMS05 – Design Statement’ of the Development Plan states “All medium to large scale planning applications (in excess of 5 residential units or 300 sq.m of retail/ commercial/office development in urban areas) or as otherwise required by the Planning Authority shall be accompanied by a Design Statement to address the contextual and design issues which have been taken into consideration as part of the scheme.

A Design Statement shall:

- Explain the design principles and design concept of the scheme.
- Demonstrate how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have been considered when designing schemes in urban areas. Each of the twelve criteria is of equal importance and must be considered in an integrated manner.
- Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Framework Plan or other similar Plan affecting the site.
- Include photographs of the site and its surroundings.
- Include other illustrations such as photomontages, perspectives, sketches.
- Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.
- Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.
- Outline how Green Infrastructure integrates into the scheme.
- Demonstrate how the proposed scheme contributes in a positive manner to the public realm and to the local context.
- Provide detail in relation to all intended finishing materials to be applied throughout the scheme, including an overall materials palette demonstrating suitability for the scheme, its context and the streetscape.

Please see Architectural Design Statement and Housing Quality Assessment and drawings prepared by Walsh Associates, and Landscape Design Statement and drawings prepared by BSM, for details in compliance with the above.

### Design Criteria for Residential Development

‘Chapter 14 – Development Management Standards’ of the Plan sets out design criteria for Residential Development in Fingal. The following areas have been carefully considered by the design team:

- **Design and Layout:** The proposed layout of the scheme has been designed in accordance with the national, regional and local policy as set out in Chapter 3 of this Report and in accordance with section 14.6.1 of the Plan.

- **Mix of Dwellings:** The development will provide a sustainable mix of unit types, sizes and tenure enabling a choice of housing for a broad section of the population.
- **Residential Density:** The proposed density has been carefully considered in the context of the established urban area in accordance with Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

**Other Residential Development Standards**

The Plan meets the relevant standards in relation to other design standards including separation distances, daylight, sunlight & overshadowing, in order to achieve a high standard of accommodation for future residents. This is set out in the accompanying application documentation, and summarised in Section 4 below.

**Daylight and Sunlight**

The proposed development has been designed with careful consideration to daylight and sunlight in accordance with Objective DMSS022. Please refer to Section 4.7 of this report for further details, and the Daylight Sunlight Assessment prepared by Waterman Moylan included with this application.

Objective DMSS022 – Daylight and Sunlight Analysis	<i>“Require Daylight and Sunlight analysis for all proposed developments of 50+ units or as required by the Planning Authority, depending on the context of the site and neighbouring property as well as the design of the development.”</i>
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**Separation Distances**

The proposed development achieves the minimum separation distance set out in Objective DMSS021 and DMSS026 below:

Objective DMSS021 – Separation Distance	<i>“A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over three-storeys in height, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.”</i>
Objective DMSS026 – Separation Distance between Side Walls of Units	<i>“Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.”</i>

	<i>(Note: This separation distance may be reduced on a case-by-case basis in relation to infill and brownfield development which provides for the regeneration of under-utilised lands and subject to the overall quality of the design and the schemes contribution to the streetscape. A statement demonstrating design mitigation and maintenance arrangements shall be submitted in such cases)</i>
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The proposed development achieves the minimum separation distance set out above. Please refer to the Architectural Design Statement prepared by Walsh Associates for further details.

### Private Open Space

With regard to private open space, the proposed development has been designed in accordance with Objective DMS2027 of the Plan:

*“Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:*

- 3 bedroom houses or less to have a minimum of 60 sq..m of private open space located behind the front building line of the house.*
- Houses with 4 or more bedrooms to have a minimum of 75 sq. m. of private open space located behind the front building line of the house.*

*Narrow strips of open space to the side of houses shall not be included in the private open space calculations.”*

### Refuse Storage

The proposed development meets the relevant standards noted below in relation to Refuse Storage. Please refer to the Architectural Design Statement prepared by Walsh Associates and Operational Waste Management Plan prepared by AWN Consulting for further details.

Objective DMSO239 – Refuse Storage Areas	<i>“Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened or other such mitigation measures are provided.”</i>
Objective DMSO249 – Distance to Communal Bin Areas	<i>“Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.”</i>

**Apartment Development/ Standards**

With regard to Apartment Development, the Plan notes Objective DMSO24 – Apartment Development:

*“All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application)”.*

The Plan further notes a number of qualitative standards incorporating the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (now updated to Apartment Guidelines 2022). Apartment developments will be assessed against the following:

**Apartment – Unit Size and Mix:**

The proposed apartments have been designed to meet the recommended unit mix and achieves/ or exceeds the required minimum floor area as set out in SPPR 3 of the Apartment Guidelines 2022 and the Plan (Table 14.7).

**Floor to Ceiling Heights:**

All ground level apartments achieve a minimum floor to ceiling height of 2.7m in line with SPPR 5 2022 of the Apartment Guidelines and Section 14.7.2 of the Plan.

**Internal Storage:**

The apartments have been designed in accordance with the minimum storage space requirements as set out in Appendix 1 of the Apartment Guidelines 2022:

Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

**Dual Aspect:**

With regard to Dual Aspect units the Plan includes reference to SPPR 4 of the Apartment Guidelines, relevant to the proposed development includes:

- *“In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.”*

Over 83% of the proposed apartment units are dual aspect, with single aspect apartments being either south, east or west facing (no north facing single aspect units).

### Lift and Stair Cores

The number of lift and stair cores is principally governed by the dual aspect ratios specified in the Apartment Guidelines. SPPR 6 requires a maximum of 12 apartments per floor per core be provided in apartment schemes.

The maximum number of apartments accessed off a single core is 8 no. apartments.

### Communal Space and Private Open Space

The Plan notes that every apartment shall have private amenity space in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Furthermore the Plan notes that the private amenity space should be provided for off the main living area in the apartment.

Communal amenity space is in addition to any private or public open space provision within a scheme and should be accessible, overlooked and conveniently located for residents.

Unit type	Private amenity space	Communal amenity space
Studio	4 sq. m.	4 sq. m.
One bed	5 sq. m.	5 sq. m.
Two bed	7 sq. m.	7 sq. m.
Three bed	9 sq. m.	9 sq. m.

Both private and communal open space has been designed and provided for in accordance with the FCC Development Plan and standards set out in the Apartment Guidelines 2022.

### Building Life Cycle Report and Management Companies:

Section 14.7.10 of the Plan note that *“planning applications for apartment developments within Fingal will be required to submit a building lifecycle report.”*

A Building Life Cycle Report has been prepared by Walsh Architects in accordance with the Plan.

### Other relevant housing policies:

#### Objective SPQHO22 – Accessible Housing

*“Fingal County Council recognises the importance of social inclusion and aims to make 30% of social housing should be fully accessible and built with a universal design approach which will mean that the property will be flexible and changed as needed over the course of the occupant’s lifetime.”*

#### **Policy SPQHP29 – Housing for All**

*“Support the initiatives proposed under Housing for All – A New Housing Plan for Ireland in providing for Fingal’s requirements for social affordable and cost-rental housing provision within Fingal, including with a focus on the development of publicly owned sites with support from state agencies where appropriate and the preparation of Local Authority Delivery Action Plans.”*

#### **Objective DMSO37 – Age Friendly Housing**

*“Require new residential developments in excess of 100 units provide 10% of the units as age friendly accommodation.”*

#### **Policy SPQHP30 – Social, Affordable and Cost Rental Housing**

*“Promote the provision of social, affordable and cost rental housing in accordance with the Fingal County Council Housing Strategy, Part V of the Planning and Development Act 2000, (as amended) by the Affordable Housing Act 2021 and government policy as outlined by the Department of Housing Local Government and Heritage Housing for All – A new Housing Plan for Ireland to 2030.”*

#### **Policy SPQHP31 – Housing Type and Tenure**

*“Support Local Authorities, Approved Housing Bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure including social and affordable housing and explore new models of low-cost rental and affordable home ownership.”*

The proposed development is in accordance with the policies noted in the objectives above and will deliver 217 no. social and affordable homes in Mulhuddart as part of a wider scheme referred to as Church Fields. While the final tenure mix has to be confirmed, the scheme includes 11 no. accessible units consisting of 6 no. apartments and 5 no. houses and 22 age friendly units comprising 8 no. houses and 14 no. apartments.

## **5 PROPOSED DEVELOPMENT**

### **5.1 Overall Design Rationale**

The proposed development is designed in accordance with both the objectives and principles of both the Fingal Development Plan 2023-2029.

The proposed development forms part of a larger c. 37ha landbank in the ownership of Fingal County Council between Damastown Avenue to the north and existing residential areas of Wellview and Avondale to the south referred to as Church Fields. The proposed development located to the east of the land bank has a site area of c.5.52ha and is referred to as ‘Church Fields East’.

The scale of the application site enables the creation of a distinct sense of place and character on these lands. The vision for the proposed development is to create a high-quality sustainable urban community with an emerging network of

public spaces and strong links to the surrounding area. The development seeks to provide quality, energy efficient homes with “green routes” throughout the site and will provide meaningful play opportunities at street, local open space & parks level.

A strategic approach has been taken regarding the natural landscape and site topography and character, to ensure that distinctiveness and permeability is evident in this phase of development.

For further details on the design approach, please refer to the Architectural Design Statement prepared by Walsh Associates and the accompanying Landscape Design Statement prepared by Brady Shipman Martin.

## 5.2 Residential Accommodation

The proposed scheme comprises 217 no. units comprising 96 no. apartments and 121 no. houses, with a mix of 1, 2, 3 and 4 bed units including 11 no. accessible units.

The proposed scheme provides the following unit mix:

	1-bed	1-bed (acc*)	2-bed	2-bed (acc*)	3-bed	3-bed (acc*)	4-bed	4-bed (acc*)	Total
Apartments	33	3	53	3	4	0	0	0	96
Houses	0	0	34	0	74	2	8	3	121
<b>Total:</b>	<b>33</b>	<b>3</b>	<b>87</b>	<b>3</b>	<b>78</b>	<b>2</b>	<b>8</b>	<b>3</b>	<b>217</b>

\*Accessible Units

The unit mix has been agreed with FCC Housing Department and is based upon their assessment of housing need and the objective to achieve a balanced mix of dwelling types and size at the appropriate location. 11 no. units consisting of 6 no. apartments and 5 no. houses have been designated as Accessible Units in accordance with Fingal County Council's Strategic Plan For Housing People with a Disability 2016-2021.

For further details on residential accommodation please refer to the Schedule of Accommodation prepared by Walsh Associates.

## 5.3 Open Space, Public Realm and Green Infrastructure

Quality public open spaces form an integral part of the proposed development’s urban structure forming a necklace of parks of varying sizes and nature across the site.

The design includes a series of identifiable places and open spaces that naturally lead people from one place to the next. Key orientation points connect into the existing public realm at the site boundaries and will provide continuity in terms of public space and wayfinding. The form of the buildings is designed to turn corners, create well defined streets and frame quality public open space.

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The necklace of new public spaces proposed will be accessible to the surrounding area and will form a link to the previously permitted Linear Park to the south. The taller residential buildings to the North and South of the site provide an overall sense of enclosure and proportion to the development while overlooking key public routes and spaces.

#### *Open Space Provision*

The overall landscape design strategy continues from the previously permitted strategy from the permitted development west of the site (FCC Reg. Ref. PARTXI/01/21).

Class 2 open space provided in this application area of c. 7,600sqm represents 16% of the site area in accordance with the Fingal Development Plan 2023-2029, which seeks 15% of Class 2 Open Space. Provision of Class 2 open space is provided for via a series of central pocket parks, and open spaces along Church Road to the east, with provision of formal and informal Local Areas of Play (LAP) for younger children and kickabout areas.

Class 1 open space is provided with the permitted 2.2 hectares of Class 1 open space to the south of the subject site within the Eastern Linear Park (FCC Reg. Ref. PARTXI/01/21) which provides an extensive amount of open space for further residents to avail off. The linear park includes for 4,400 sq.m of Local Area of Play (LEAP) for younger children and equipped play areas for older children.

In addition, a diverse range of street tree planting, including replanting of existing young oak trees is provided for within open spaces. Please refer to the Landscape Design Statement prepared by Brady Shipman Martin for further details.

#### *Play Policy*

In accordance with Fingal County Council's proposed play strategy "Space for Play A Play Policy for Fingal" and as per Objective DMS056 of Fingal Development Plan 2023 2029, every home within the scheme is within 150m walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park. This proximity can be noted on the Site Plan, and details are included in the Landscape Architect's design.

#### *Communal Open Space*

Secure, accessible and usable communal space (c. 725sqm) is provided for residents of the Apartment Blocks and in particular families with young children and for less mobile older people based on space requirements defined by the Apartment Guidelines (see Section 5.4.2 below).

Communal space takes the form of ground floor gardens accessible to residents only. Specifically:

- Block D: Communal Amenity Space located at ground floor to the south of Block D.
- Block E: Communal Amenity Space located at ground floor level to the south of Block E.
- Block F: Communal Amenity Space located at ground floor level to the south of Block F.

Please see BSM Landscape Design Statement for details on communal open space.

#### *Private Open Space*

Each unit is provided with Private Amenity Space in the form of a balcony or rear garden which is accessible from the living area or kitchen through a glazed door. Transition zones are created between the private space of the houses and the public realm. A low brick wall and metal railing encloses a space for bins, bicycle storage and utility meters. Planting to the rear of the metal railing also serves to soften the streetscape.

Areas of Private Amenity Space for each unit meet or exceed the minimum requirements of Objectives DMS075. Please see Walsh Associates Housing Quality Assessment for details.

Please see BSM Landscape Design Statement for details on open space provision.

#### *Sustainable Drainage Systems (SuDS)*

In accordance with Objective GINHO14, it is proposed that at least 70% (c. 1,800 sq.m) of the apartments roof area will be utilised for green roof areas. In addition other SuDS features including swales, permeable paving and rain garden planters are provided across the scheme in accordance with Objective GINHO15.

It is proposed to attenuate surface water run off into the open space at the centre of the site. The western boundary of the site will connect into the surface water network for Church Fields Housing and Eastern Linear Park Development (Permitted under FCC Ref.: Part XI/012/21). Please refer to Waterman Moylan Engineering Assessment Report for further information.

## **5.4 Residential Quality Standards**

The vision for residentially zoned lands is to ensure the provision of high quality new residential developments with good layout and design, within close proximity to community facilities, and with an appropriate mix of house sizes, types and tenures.

The proposed development is fully in compliance with the Fingal County Council Development Plan Standards, as set out in Chapter 14, and with the Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities (2022) where applicable.

This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment (HQA) prepared by Walsh Associates and is submitted as part of this Part 10 (S175) Planning Application.

How this development complies with all FCC Development Plan standards and with the Sustainable Urban Housing Guidelines is set out more fully in the Architectural Design Statements and Housing Quality Assessments which forms part of the enclosed documentation.

#### 5.4.1 Residential Quality Standards – Houses

The vision for residentially zoned lands is to ensure the provision of high quality new residential developments with good layout and design, within close proximity to community facilities, and with an appropriate mix of house sizes, types and tenures.

#### Floor Areas

The Development Plan sets out that the “minimum size of habitable rooms for houses shall conform with dimensions as set out in Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 or the appropriate National Guidelines standards in operation at the date of lodging the application for planning permission.” (page 543).

Individual dwellings have been designed to ensure a high-quality living environment for residents, with regard to minimum room sizes, dimensions and overall floor areas. All houses have been designed in accordance with Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007.

#### Separation Distances

The layout of the houses is such that separation distances in excess of 22m between opposing first floor windows as per Objective DMSO23 is achieved. At the corners of blocks, where rear garden depths are below 11m, no windows are placed in the gable walls of adjacent dwellings thus maintaining privacy and protecting residential amenity.

To allow access and maintenance, a separation distance in excess of 2.3m is provided between side walls of dwellings and adjacent terraces as per Objective DMSO26 of the Development Plan:

#### Objective DMSO26 – Separation Distance between Side Walls of Units

*“Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units.*

*(Note: This separation distance may be reduced on a case-by-case basis in relation to infill and brownfield development which provides for the regeneration of under-utilised lands and subject to the overall quality of the design and the schemes contribution to the streetscape. A statement demonstrating design mitigation and maintenance arrangements shall be submitted in such cases)”*

Please refer to the Architectural Design Statement and Architectural Drawings prepared by Walsh Associates which illustrates compliance with Objective DMS026.

### **Private Open Space**

In terms of private open space the Development Plan sets out the importance of private open space in relation to houses. One of the characteristics of traditional type housing is the provision of private open space, usually to the rear of the front building line of the house.

Objective DMS027 aims to ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:

- 3 bedroom houses or less to have a minimum of 60 sq. m. of private open space located behind the front building line of the house.
- Houses with 4 or more bedrooms to have a minimum of 75 sq. m. of private open space located behind the front building line of the house.
- Narrow strips of open space to the side of houses shall not be included in the private open space calculations.

As evident in the HQA provided by Walsh Associates, in respect of the housing units, the proposed development meets and exceeds this standard.

## **5.4.2 Residential Quality Standards – Apartments**

### **Apartment – Unit Size and Mix**

The proposed unit mix is in compliance with the unit mix requirements of SPP1 of the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities which states:

#### **SPPR 1**

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

It is considered that with regard to the range of house types proposed for Church Fields East (as set out above), that the inclusion of 33 no. 1-bed apartment units within the overall housing mix at this location is in compliance with the Development Plan, equating to 17% of the overall unit mix.

### **Floor Areas**

The proposed floor areas are in compliance with the amended mix requirements of SPPR 3 of the Guidelines which states:

**SPPR 3**

Minimum Apartment Floor Areas:

Unit Type	Size (sq. m.)	Private Open Space Required (sq. m.)	Communal Open Space required (sq. m.)	Storage Space required (sq. m.)
Studio (1 person)	37	4	4	3
One Bedroom (2 person)	45	5	5	3
Two Bedroom (3 person)	63	6	6	5
Two bedroom (4 person)	73	7	7	6
Three bedroom (5 person)	90	9	9	9

The proposed development includes units above the minimum floor areas. It is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.

The proposed residential units meet or exceed the minimum standards for apartment sizes. All units are above minimum floor standards and many exceed these standards significantly.

Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the Housing Quality Assessment as prepared by Walsh Associates.

**Floor to Ceiling Heights**

The Development Plan notes that floor to ceiling heights should be in line with SPPR 5 of the Apartment Guidelines.

**SPPR 5**

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

The proposed apartments at ground floor level exceed recommended floor to ceiling heights of a minimum of 2.7m at ground floor level. Please refer to Architectural drawings prepared by Walsh Associates for further details.

Studio	3 sq.m
One bedroom	3 sq.m
Two bedrooms (3 person)	5 sq.m
Two bedrooms (4 person)	6 sq.m

Three or more bedrooms	9 sq.m
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As set out in the Housing Quality Assessment – Apartments prepared by Walsh Associates, the internal storage included within the apartments is in accordance with the Sustainable Urban Design Standards for New Apartments 2022 and the Development Plan.

### Dual Aspect

With regards to dual aspect units, the Development Plan notes that proposed apartments must be in accordance with SPPR 4 of the Sustainable Urban Design Standards for New Apartments 2022:

#### SPPR 4

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

While SPPR4 states *‘In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: (ii) in suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.’*

The Development Plan standards state that apartment units shall be provided with a good level of daylight and sunlight which contribute to a high quality living space.

Additionally the 2022 Guidelines state at Section 3.18 that *“Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered where overlooking a significant amenity such as a public park, garden or formal space or a water body or some other amenity feature.”*

The proposed development is in compliance with the requirements of Section 3.17 and SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022) by providing approximately 84% dual aspect units and c. 15% single aspect units of which none

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are north facing. In this regard, the proposed development provides a high standard of residential amenity.

#### Lift and Stair Cores

The Development Plan notes that the number of lift and stair cores is principally governed by the dual aspect ratios specified in the Apartment Guidelines, SPPR 6 requires a maximum of 12 apartments per floor core to be provided in apartment schemes.

#### SPPR 6

*A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.*

The proposed development includes a maximum of 8 no. apartments per lift and stair core in compliance with SPP6 and the Development Plan.

#### Private and Communal Open Space

The Development Plan notes that “applications must clearly distinguish between communal and public open space to serve an apartment development.” Please refer to the Landscape Masterplan prepared by Brady Shipman Martin for details.

The Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities (2022) state that private amenity space shall be provided in the form of gardens or patios / terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security.

Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and be of a minimum depth of 1.5m.

The Guidelines require the following minimum private amenity sizes:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

The proposed balconies or terraces meet or exceed the minimum standards for private open space. The landscape design has incorporated measures to distinguish between private, communal, and public spaces including planting and hedge rows, and low level railings.

The Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities (2022) also require that communal amenity space must be provided within a scheme which can be in the form of courtyards,

roof gardens etc. In addition in larger schemes communal internal spaces are to be provided for residents use only i.e. multi-purpose rooms, cinema rooms, gym etc. With regard to the modest scale of apartment development, it is not considered that internal communal spaces are required.

The Guidelines require the following minimum communal open space areas:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed 7 sq.m.
- 3-bed 9 sq.m.

The total communal open space requirement for the 96 no. apartments is c. 608 sq.m, with the proposed development providing c. 725 sqm of communal open space. The proposed apartments have been considerably landscaped with quality communal open space which meets these standards.

## 5.5 Access, Car & Cycle Parking

### *Access*

Vehicular access to the site is proposed via the permitted Church Fields Part 8 scheme to the west. Pedestrian and cycle links also connect the new development to the surrounding residential areas. All roads are designed to the standards as set out in Design Manual for Urban Roads and Streets (DMURS 2019).

### *Car Parking*

The approach to car parking has been to balance the requirement for car parking provision with the need to promote sustainable transport including walking and cycling, maximising use of existing and planned public transport services in the vicinity of the site, and ensure that parking provision minimises potential negative impact on the public realm and on residential amenity. Parking is located on on-street, where possible in front of residential units, or in dedicated car parking areas associated with the apartment blocks, such that they are easily accessible.

### *Car Parking Provision*

The Fingal Development Plan (2023 – 2029) sets out residential parking provision with two distinct car parking zones:

- *“Zone 1: relates to developments within 800m of Bus Connects spine route, or 1,600m of an existing or planned Luas/Dart/Metro Rail station or within an area covered by a Section 49 scheme, or in lands zoned Major Town Centre.*
- *Zone 2: Relates to all other areas within the County.”*

As set out in the Waterman Moylan Traffic and Transport Assessment, the proposed development site is located adjacent to the proposed BusConnects Branch Route B3, which feeds into the B Spine Route at Blanchardstown. The

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subject development site is therefore identified as being in Zone 2 in parking provision terms.

However, with improved public transport access planned for the area in close proximity to the lands (detailed in the Traffic & Transport Assessment submitted with this application), this site is considered a transitional area and the level of parking proposed balances the need to make appropriate provision for car parking and encouraging the use of public transport. An overprovision of car parking could discourage the latter by facilitating travel by private vehicle.

As further discussed in the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers the site would be classified within the Sustainable Urban Housing, Design Standards for New Apartments (2022) as being in an “*Intermediate Urban Location*” (which requires reduced car parking provision), and within the *Greater Dublin Areas Transport Strategy (2022-2042)*, as a site located between the metropolitan boundary and the M50, which should be subject to maximum parking standards.

A total of 306 car parking spaces are proposed to serve the subject development, with 5% disabled spaces provided, and 20% equipped with charging points for electric vehicles. 12 motorcycle spaces are proposed for the apartments at a rate of 1 motorcycle bay per 10 car parking spaces.

It is acknowledged that the parking provision proposed is less than the standard specified for Zone 2 developments. However, it is above the standard for Zone 1. This is considered acceptable in the context of the forthcoming BusConnects improvements in the area, improved connectivity to green infrastructure networks and public transport, and the site’s location as an *Intermediate Urban Location* as per the Apartment Guidelines. (Please see Traffic and Transport Assessment, by Waterman Moylan Consulting Engineers for detailed assessment).

#### ***Accessible Parking***

Access from parking spaces to residential entrances will comply with Part M Access and Use, of the Building Regulations. Designated accessible parking bays will be located adjacent to the designated accessible units.

#### ***EV Parking Spaces***

In accordance with Section 14.17.10 of the Fingal Development Plan, 20% Electric vehicle parking spaces are to be provided with ducting provision for the remainder of parking spaces for future provision of electric vehicle charging.

#### ***Bicycle Parking***

Bicycle parking standards for new developments are set out in Table 14.17 of the Fingal Development Plan (2023 – 2029), and are summarised below:

Land Use Category	Bicycle Parking Standards	
	Long-Stay	Short-Stay
Residential (1-2 Bedroom)	1, plus 1 per bedroom	0.5 per unit (for apartment blocks only)
Residential (3+ Bedroom)	2, plus 1 per bedroom	0.5 per unit (for apartment blocks only)

*Bicycle Parking Standards Extract – Table 14.7 Fingal Development Plan 2023-2029*

The proposed development exceeds the requirements of the FCC Development Plan (requiring 856 no. spaces), and provides 897 no. bicycle parking spaces made up of 849 long term resident spaces and 48 short stay visitor spaces.

All houses are provided with secure bicycle storage in the front of the house, while those with rear access to gardens will be capable of storing bicycles to the rear. Additional bicycle storage space is provided to houses through the provision of 16 Standalone On-street Bike Bunkers. Each bunker is capable of accommodating 6 no. bikes in a dry and secure environment.

Cycle parking provision in apartments is made in accordance with the Fingal County Development Plan. Covered, secure external shelters serves Blocks D, E & F, conveniently located close to the block entrances, and integrated into the development as part of the architectural language of the scheme.

It is submitted that bicycle parking provision in the proposed scheme meets the requirements of the Fingal Development Plan, as per Section 14.17.2.1, and Objective DMSO109.

Please see enclosed with this Planning application documentation, the Traffic and Transport Assessment, and Travel Plan, both prepared by Waterman Moylan Consulting Engineers, for further details on parking provision. Please also refer to Architectural Design Statement prepared by Walsh Architects.

## 5.6 Refuse Storage and Bins

The proposed development meets the relevant standards in relation to Refuse Storage and Bins.

Waste generated by residents in apartments will be stored in dedicated communal bins storage areas, strategically located close to the entrances for each block. Bin stores have been adequately sized to accommodate weekly storage of organic, dry mixed recyclables, glass and mixed non-recyclable waste.

Proposed refuse storage is in accordance with Objective DMSO238 and DMSO40 not exceed the maximum distance of 50m from front door to communal bin area.

## Church Fields

### Church Fields East Planning Report

Please refer to the Operational Waste Management Plan prepared by AWN Consulting and the Housing Quality Assessment prepared by Walsh Architects for further details on refuse storage.

#### ***Bring Banks***

Objective DMSO234 of the Fingal Development Plan has regard to the provision of public bring banks noting:

*“Ensure the provision of public bring banks in all large retail developments, unless there are existing facilities within a 1km radius. Bring bank facilities will generally be required at appropriate locations in the following development types: [...]*

- *In conjunction with medium and large scale residential and mixed-use developments providing in excess of 10 residential units, proposals should provide recycling and bring bank facilities to serve residents and in some appropriate locations, the wider community.”*

The proposed development is a residential scheme being delivered as part of a wider development of residential and mixed use facilities at this location. FCC is committed to providing such facilities in a more publicly accessible space within Mulhuddart/ Tyrrelstown area in accordance with DMSO234 above.

## **5.7 Sunlight and Daylight**

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development.

The Daylight and Sunlight Assessment follows methodologies set out in the Building Research Establishment’s (BRE) publication titled “Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice – Third Edition 2022 (hereinafter referred to as BR209-2022).”

In summary, the Daylight/ Sunlight Assessment prepared by Waterman Moylan concludes:

- The communal amenity areas & pocket parks demonstrate levels of sunlight above the recommend 2 hours over 50% of the area on the design test day 21st March therefore these spaces are shown to be fully compliant with the BR 209 2022 targets.
- The overall shadowing analysis identifies negligible impact on the adjacent properties nearest to the proposed development.
- Overall, across the scheme, 100% of the spaces analysed demonstrate compliance with the BR-209-2022 recommended illuminance targets.

## **5.8 Social Infrastructure & Childcare Facilities**

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing developments where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. However the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2022) state that:

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

The proposed development contains 17% one-bed units which as per the above, should be discounted from the requirement, resulting in a total of 181 no. units as the basis for the calculation. The application of 20 no. spaces for every 75 no. units would result in a requirement of c. 48 no. childcare spaces.

However, based on specific percentage breakdown of population in 0-4 age group within the surrounding area (Blanchardstown-Tyrrelstown ED) which equates to 8.5% of the total of the population, a requirement of 22 no. childcare spaces are required. The assessment concluded that a total number of 22-48 no. childcare spaces are required to meet the childcare demand of the proposed development.

The separate *Social Infrastructure & Childcare Demand Report* prepared by Brady Shipman Martin (accompanying this planning application) sets out that the childcare requirements for this proposed development which will be met by the recently permitted Church Fields Part 8 development which incorporates a creche with capacity for c. 95 - 140 no. children. (Reg. Ref. PARTXI/012/21). This facility will be complete prior to construction of the current proposal.

## **5.9 Part V Requirements**

As the proposed development is promoted by Fingal County Council under S175 of the Planning and Development Act for residential development, Part V requirements are fully met, with the proposed scheme proposing a mixed tenure residential development.

## **6 ENVIRONMENTAL CONSIDERATIONS**

### **6.1 APPROPRIATE ASSESSMENT**

An Appropriate Assessment (AA) Screening Report has been prepared by Brady Shipman Martin and is submitted as part of this Part 10 (S175) planning application .

The Appropriate Assessment report concludes the following:

*“In view of best scientific knowledge, this report concludes that the proposed development at Church Fields East, Mulhuddart, Dublin 15, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.”*

## 6.2 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

An EIAR prepared by Brady Shipman Martin has been prepared as part of this Part 10 (s175) planning application in accordance with the requirements as set out in the EIA Directive, (2011/92/EU), as amended by Directive 2014/52/EU and relevant guidelines and documentation.

## 7 CONCLUSION

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this zoned strategic residential site. The proposed development will provide for a total of 217 no. residential units comprising 121 no. houses and 96 no. apartments on a total site of approximately 5.52ha.

This Planning Report demonstrates that the proposed development is in accordance with National Regional and Local Policy including the Fingal County Development Plan 2023-2029, Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities December 2022, and with the proper planning and sustainable development of the area.

It is considered that the proposed development is consistent with proper planning and sustainable development of the area, and it is respectfully requested that permission is granted for the proposed development which will positively contribute to mixed tenure housing delivery in Mulhuddart and the wider area.