



STATEMENT OF CONSISTENCY – WHITE PINES EAST SHD

FOR ASSESSMENT OF PROPOSED RESIDENTIAL DEVELOPMENT AT WHITE PINE EAST, STOCKING AVENUE, DUBLIN 16



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1.0 INTRODUCTION

On behalf of the applicant, Ardstone Homes Limited¹ this Statement of Consistency with Planning Policy has been prepared to accompany a proposed planning application in relation to a proposed Strategic Housing Development (SHD) on a site of c. 2.98 hectare site at lands south of Stocking Avenue, Stocking Avenue, Dublin 16.

The proposed development will provide 241 no. residential units in a mix of (there are no studios?), 1 and 2 bed apartments and duplex units, with associated residential amenity facilities.

This Statement of Consistency with planning policy has been prepared to specifically address the requirements of the strategic housing development guidance document issued by An Bord Pleanála. This planning application is also accompanied by a Planning Report which includes further detail in respect of the proposed development in relation to the site location and context, the proposed development and the site's planning history.

Please note that a separate Material Contravention Statement (March 2021), prepared by TPA, has also been submitted in relation to the development.

In addition, the application is also accompanied by an Environmental Impact Assessment Report (EIAR), prepared by TPA dated March 2021, detailing the environmental impact of the proposed development.

This standalone planning policy Statement of Consistency is prepared by TPA Planning Consultants to demonstrate that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by John Fleming Architects (JFA), Mitchell & Associates (MA) Landscape Architects and DBFL Consulting Engineers.

For further details of consistency with the quantitative standards for residential units as set out in the *Apartment Guidelines* (December 2020), and the *South Dublin County Council Development Plan 2016-2022*, please refer to the *Housing Quality Assessment* document prepared by JFA, which accompanies the application.

1.1 Link with adjoining lands

The subject site at White Pines East forms part of a wider masterplan development, known as White Pines, identified in Figure 1.1 below. The White Pines Masterplan site comprises; White Pines East, White Pines Central, White Pines North, White Pines South and White Pines Retail.

As noted in Section 3 below, the entire White Pines Masterplan Site is controlled by our client, Ardstone Homes Ltd, who have already provided 281 No. 3-5 bed family homes on adjacent sites. The subject application at White Pines East SHD comprises the 4th phase of the wider White Pines masterplan development, see Table 1.1.

¹No. 48 Fitzwilliam Square, Dublin 2, D02 EF89.

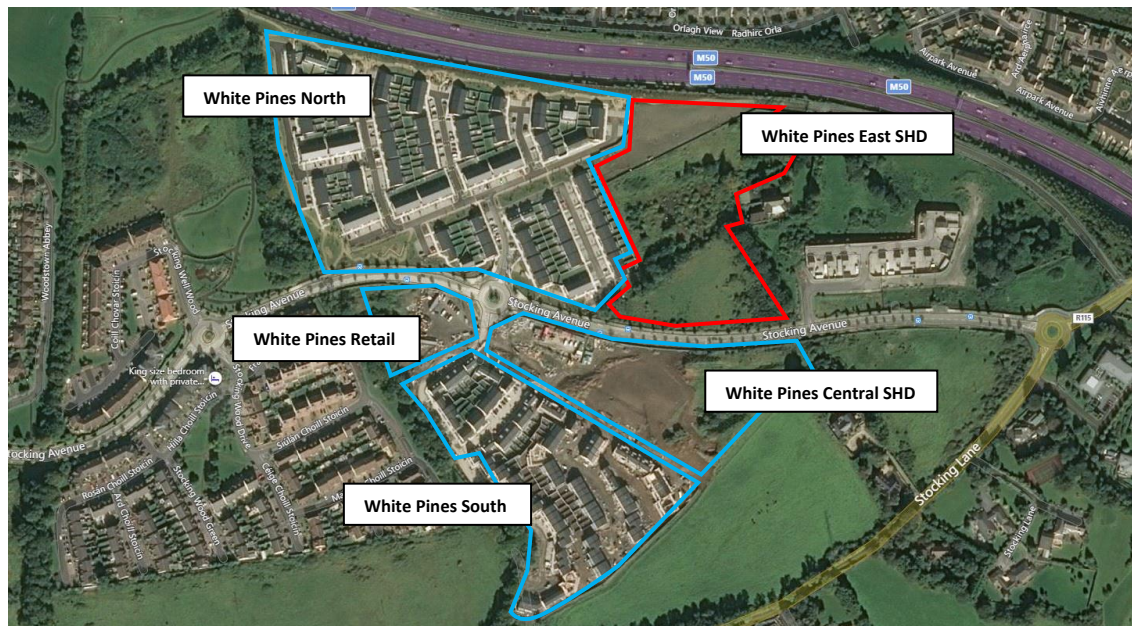


Figure 1.2: White Pines Masterplan Site, source Google Maps, annotated by TPA, March 2021

Phase	Provided/Proposed	Status
1. White Pines North	175 no. 3-5 bed family homes	Complete and Occupied
2. White Pines South	106 no. 3-5 bed family homes	Complete and Occupied
3. White Pines Retail	A single storey convenience retail unit (c.1,688 sq.m. GFA) and a three storey creche building (c.591sq.m. GFA).	Construction Commenced August 2020. Completion is scheduled for Q3 2021, with immediate occupation by National Retailer
4. White Pines East SHD	241 units in a mix of 1 and 2 bed apartments.	Subject Application
5. White Pines Central SHD	Proposed development of 137 no. 1-3 Bed apartments/duplex units	Pre-application tripartite SHD meeting held with ABP and SDCC February 2021.

Table 1.1: White Pines Masterplan Development

In addition to the above, it is also noted that Ardstone Homes are currently progressing a separate SHD planning application for development at White Pines Central (An Bord Pleanála Ref: ABP-308642-20), located directly south of the application site. The design of the proposed development has also been carefully considered to have regard to this and existing neighbouring developments to ensure a coherent design approach across all existing and forthcoming residential developments, in the Master Plan area.

1.2 Legislative Context

In accordance with Section 4(1) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, Ardstone Homes intends to apply for planning permission in respect of a proposed Strategic Housing Development (SHD) at Lands north of Stocking Avenue, Woodstown, Dublin 16. The subject report constitutes the Statement of Consistency required to support the application.

1.3 Outline of This Report

This Statement of Consistency provides a description of the proposed site location and proposed development followed by a list of the various statutory and strategic policy documents considered. The Statement demonstrates the proposed developments consistency with the pertinent Local Area Plan, Development Plan, and the relevant S.28 Guidelines.

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 Site Location

The subject site, White Pines East SHD, is located in south west Dublin, on a site north of Stocking Avenue, in the administrative district of South Dublin County Council. The site comprises a c.2.98 ha site, zoned for 'new residential' in the *South Dublin Development Plan (SDDP) 2016-22* and *Ballycullen/ Oldcourt Local Area Plan (BOLAP) 2014*.

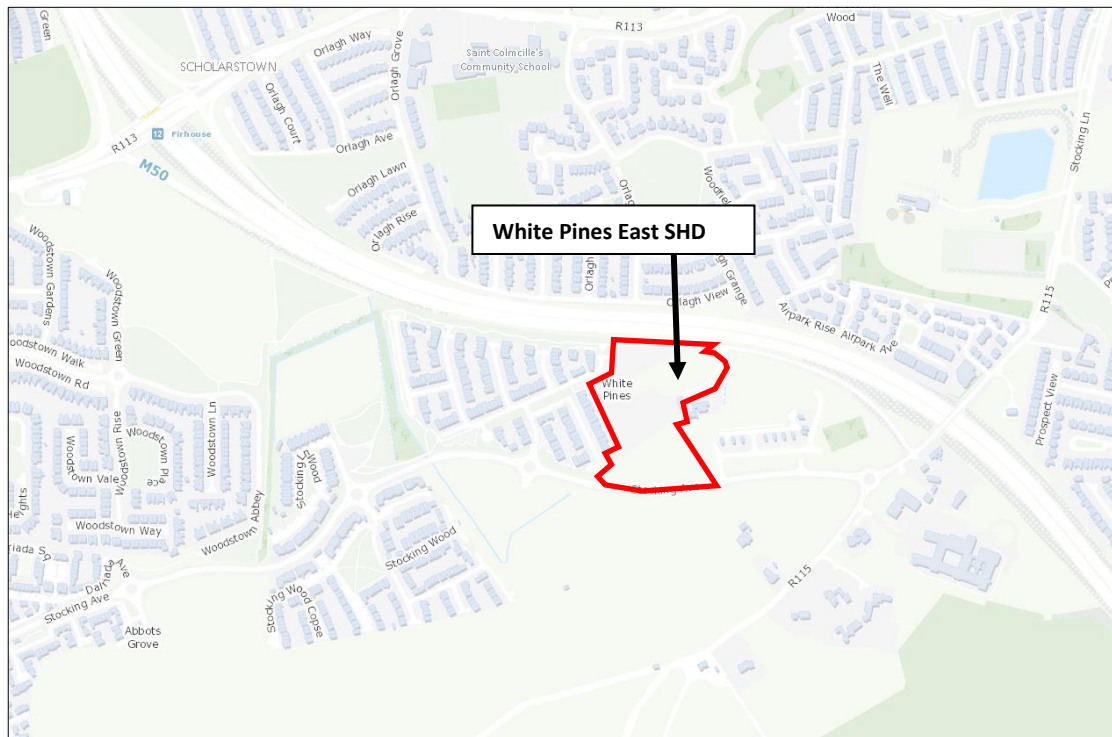


Figure 2.1: Location of Subject Site (Source: Bing Maps; annotated by TPA, 2021).

The site is located within an area characterised primarily by new residential. The site is principally bounded by the White Pines North residential scheme to the west; Stocking Avenue to the south; Stocking Hill residential development and Green Acres House and to the east; and the M50 to the north.

The site is greenfield in nature but lies adjacent to the White Pines North residential development along the boundary to the west.

The subject site is located approximately 1.5 km to the south-east of Woodstown village centre. The site is accessed from Stocking Avenue, which is a distributor access route to the residential areas south of Woodstown Village.

The subject site is well served by public transport. Several bus routes run in the immediate vicinity of the site with bus stops located at a close distance on Stocking Avenue and Ballycullen Road. There is an existing Dublin Bus stop located in front of the application site, serving the 15B bus route, providing high frequency peak service to the city centre, via Rathmines.

The proposed residential development at White Pines East SHD will be supported by a number of community facilities in close proximity including schools, sports clubs, shops,

leisure and medical services. For Further information please refer to the Community Infrastructure Audit, prepared by TPA, submitted with this application. A dedicated community building is also being provided on the ground floor of Block A, as part of the development.

2.1.1 Proposed Development

As detailed in the Architectural Design Statement, prepared by JFA, the proposed design strategy responds to the opportunities and constraints of the location and the sites characteristics including its sloping topography.

2.1.2 Residential – Apartments

The development will comprise the construction of 241 no. residential units, in 5 no. apartment blocks, ranging in height from 4-6 storeys, and three storey duplex blocks.

The project will comprise:

Units Type	Number of Units Proposed
One Bed Apartments	93
Two Bed Apartments	148
TOTAL	241

Table 2.1: Proposed Residential Mix

A total of 194 no. car parking spaces are provided to serve the development.

In total 401 no. cycle parking spaces will be provided to serve the development. The development proposes 337 no. dedicated cycle parking spaces to serve the apartments, including no. short stay spaces, with an additional 7 no. cycle parking spaces for the community centre, located at various locations throughout the application site.

2.1.3 Landscaped Amenity / Open Space

Landscaped open space is provided at c.44.7% (c.13,347sq.m) of the overall site area and is principally located centrally and at the northern boundary of the site. c.6,956 sq.m (c.23%) will be provided as useable public open space including a level kickabout space, incidental play elements and lawns. A further c.6,391sq.m (c.21%) will be provided as visual amenity comprising walking trails, woodland habitats and green links. c.782sq.m of semi-public open space is also provided to the western boundary.

As noted in Section 5.3.4 of the Planning Report, prepared by TPA, 2 no. areas of proposed open space on the subject site overlap with the open space provision at White Pines North. As such, these areas have been discounted from the overall open space proposed at White Pines East. This has resulted in a revised Open Space provision of c. 11,392sq.m, representing an open space provision of c38% for White Pines East SHD.

3.0 POLICY DOCUMENTS CONSIDERED

The following policy documents have informed this Statement of Consistency:

3.1 National Strategic Policy Documents

- *Project Ireland 2040 - National Planning Framework (2018).*
- *National Development Plan (2018 – 2027)*
- *Eastern and Midlands Regional Spatial Economic Strategy (2019).*
- *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing: Design Standards for New Apartments (December 2020).*
- *Design Manual for Urban Roads and Streets (DMURS) (2013).*
- *The Planning System and Flood Risk Management (2009).*
- *Sustainable Residential Development in Urban Areas (2009).*
- *Urban Design Manual: A Best Practice Guide (2009).*
- *Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)*
- *Part V of the Planning and Development Act 2000: Guidelines (2017).*

3.2 Local Statutory Policy Documents

- *Ballycullen-Oldcourt Local Area Plan 2014, as Extended*
- *South County Dublin Development Plan 2016-2022.*

4.0 STRATEGIC NATIONAL PLANNING POLICY

4.1 Project Ireland 2040 – National Planning Framework (2018)

The National Planning Framework, published in February 2018, sets out a strategic development framework for the Country to 2040. Among its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments.

With particular respect to housing and community development, National Policy Objective 33 of the National Planning Framework has the following stated objective:

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

Under the heading of Compact Growth, the NPF states;

“Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport.”

Subject Proposal is Fully Consistent with Provisions of the NPF:

As noted above, the entire White Pines Masterplan Site is controlled by our client, Ardstone Homes, who have already provided 281 No. 3-5 bed family homes on adjacent sites. The subject application at White Pines East SHD comprises the 4th phase of the wider White Pines masterplan development, see Table 1.1.

The proposed development at White Pines East SHD represents the 3rd residential phase (4th overall phase) of development for the wider White Pines Masterplan Site, see Figure 1.1 above, comprising the provision of 241 no. residential units on a greenfield strategically located and residentially zoned site. The proposed development provides a sensitive design that responds to the site’s unique characteristics in full accordance with National Policy Objective 33.

In particular, the redevelopment of this site, zoned for new residential, would contribute to compact growth. The proposed development would also ensure the much-needed provision of residential units for the area in line with the provisions of the NPPF.

4.2 National Development Plan (2018 – 2027)

The National Development Plan (NDP) 2018-2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework (NPF). This is designed to support the ten National Strategic Outcomes (NSO) of the NPF. This provides a strategic framework for public capital investment to support the delivery of the NPF over the next 10 years.

Under the National Development Plan investment in public transport infrastructure will be accelerated to support the development of an integrated and sustainable national public transport system consistent with the NPF NSOs of Sustainable Mobility as well as Compact Growth. This will support National Strategic Outcomes 4 “Sustainable Mobility”.

“Public investment in environmentally sustainable public transport systems in major urban areas and nationally is a primary enabler to NSOs under the NPF relating to Compact Growth in urban areas and Improved Regional Connectivity and is one of a number of most important priorities to achieve climate action objectives.”

Subject Proposal is Fully Consistent with Provisions of the NDP

The Proposed residential development is fully in compliance with the NDP, as it will facilitate compact growth in an urban area through the provision of 241 no. residential units on a greenfield residentially zoned site.

The subject site is strategically located on zoned lands adjacent to the existing urban footprint of the Ballycullen/Oldcourt area of South Dublin. The site is well served by public transport, with a bus stop for Dublin Bus Route No. 15B located at the entrance to the site on Stocking Avenue. Dublin Bus route no. 15 is also located c. 1 km west of the site on Ballycullen Road. In addition to this, significant public transport improvements are also proposed for the area as part of Dublin Bus ‘BusConnects’ programme.

The National Transport Authority (NTA) has developed a strategic transport plan, known as BusConnects, which will transform and overhaul the current bus network to provide a more efficient network. The proposed network will deliver the ‘next generation’ of bus corridors on the busiest routes and will re-design routes with the aim of offering fast, predictable and reliable bus journeys.

As noted in Section 2.6.8 of the Traffic and Transport Assessment, prepared by DBFL, and Section 2.3 of the Planning Report, prepared by TPA, under the BusConnects proposals, two new high frequency bus routes (Route A1 and Route 16) will serve Ballycullen. Route A1 will connect to Clongriffin via City Centre while Route 16 will run from Tallaght to College Green via Oldcourt.

Furthermore, the design, density and building heights proposed are considered to sensitively responds to the site’s unique characteristics and sloping topography, in full accordance with National Development Plans overarching aim of consolidation.

4.3 Eastern and Midlands Regional Spatial Economic Strategy 2019

The *Regional Spatial & Economic Strategy (RSES)* was published in 2019 by the Eastern and Midland Regional Assembly (EMRA). The EMRA forms part of the regional tier of governance in Ireland. The EMRA area covers 9 counties including Dublin, with three sub-regions or Strategic Planning Areas (SPAs) including the Dublin SPA.

The RSES is a strategic plan that identifies regional assets, opportunities and pressures and provides policy responses in the form of Regional Policy Objectives. The main statutory

purpose of the Strategy is to support the implementation of the NPF and the National Development Plan (NDP).

Subject Proposal is Fully Consistent with Provisions of the Eastern and Midlands Regional Spatial Economic Strategy 2019

The subject site is located in the area identified as the 'Dublin City & Suburbs' within the Dublin Metropolitan Area. The RSES includes an objective to prepare a Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands throughout the City's Metropolitan area to support Dublin's sustainable growth and continued competitiveness. The Strategy reiterates the NPF principle of compact and sustainable growth with a target of 30-40% of new homes to be built on land within the built-up area. The MASP further supports the consolidation of Dublin City and Suburbs with a target population of 1.4 million people in the area by 2031.

The provision of 241 no. residential units on zoned lands within the 'Dublin City & Suburbs' area is fully consistent with the settlement strategy, set out in the Eastern and Midlands RSES.

4.4 Urban Development and Building Height Guidelines for Planning Authorities (2018)

The aim of the *Urban Development and Building Heights Guidelines (Height Guidelines) 2018* is to ensure that local height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built-up areas.

The Height Guidelines identify in SPPR 1, the requirement for local authorities to review statutory plans in support of increased densities and building heights on infill sites, such as the subject site.

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

Section 1.3 of the Height Guidelines notes;

"in determining planning policy and making planning decisions around appropriate building heights, the planning process has to strike a careful balance between on the one hand enabling long-term and strategic development of relevant areas, whilst ensuring the highest standards of urban design, architectural quality and place-making outcomes on the other".

The Height Guidelines also notes that a number of Local Authorities have recently identified generic maximum building height limits across their functional areas but that:

“such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes”.

The Height Guidelines acknowledge that;

*“while achieving higher density does not automatically and constantly imply taller buildings alone, **increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability**” (Section 2.3)*

SPPR 3 of the Height Guidelines states;

It is a specific planning policy requirement that where;

- A. *“1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;
then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”
- B. *.”*

In submitting a planning application for increased building heights, the Height Guidelines (Refer Section 3.2 of the Height Guidelines) set out a number of criteria which must be complied with when considering an increase in height, each of which is addressed in the following sections of this Report, with respect to the proposed development at White Pines East SHD.

A. At the scale of the relevant city/town

- A1.** *“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport”.*

The site benefits from good public transport connections, with a high frequency peak public transport links. The site is located adjacent to the 15B bus stop, providing high frequency peak bus links to Dublin City via, Rathfarnham Village, Rathgar and Rathmines. The site is also within easy walking distance (c.1.06km, 15 min walk) of the 15 bus route terminus. The 15 bus route is a cross City service connecting Ballycullen Road to Clongriffin Rail Station. This service also provides access to the City Centre via Knocklyon, Templeogue, Rathfarnham and Rathmines.

In addition to this, Tallaght Town Centre and Tallaght Hospital, significant employment hubs for the surrounding area, are also accessible via connecting bus services, Dublin Bus routes 61/161. These routes also provide a direct connection to the Line Luas at Tallaght. During morning peak (7am- 10am), public transport journey times are listed to take c. 35-45mins (source: googlemaps.com).

As noted in Section 2.6.8 of the Traffic and Transport Assessment, prepared by DBFL, and Section 2.3 of the Planning Report, prepared by TPA, under the BusConnects proposals, two new high frequency bus routes (Route A1 and Route 16) will serve Ballycullen. Route A1 will connect to Clongriffin via City Centre while Route 16 will run from Tallaght to College Green via Oldcourt.

- A2.** *“Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect”.*

The design of the proposed development has been given careful consideration through evolution of the scheme design. The height and scale of the proposed development has been carefully selected to reflect the site’s topography. The tallest apartment block proposed, Block E at 6 no. stories, is located at the lowest point of the site, on its northeastern boundary. Building heights are reduced in line with the sloped topography, whereby the blocks located to the south of the site, Blocks A and B comprise 4 storey blocks.

In addition to the above, it is also noted that the proposed development includes 3 no. three storey duplex blocks to the western boundary of the site. It is considered that a three-storey building in this location provides a suitable progression from the existing 2 storey residential units at White Pines North to the western façade of the 5 storey Block C. It should also be noted that the inclusion of a three-storey building in this location will ensure Block C will be entirely screened when viewed from the ground floor rear facades of the existing residential units bordering the site at white pines north.

The proposed landscaping treatment has been specifically designed to ensure that it ties into the existing areas of open space, through the provision of a pockets of useable open space. The use of natural building materials (e.g wood), which has already successfully been implemented at White Pines North and South, will further ensure a coherent design.

In addition to this, as noted in the Landscape Masterplan prepared by MA, the area of open space proposed at White Pines East SHD will be provided in combination with the wider White Pines Masterplan site, to ensure a coherent provision of Open space that serves the entire White Pines Masterplan site. For further information, please refer to the Landscape Masterplan Report, prepared by MA.

In addition to this a Landscape and Visual Impact Assessment has also been submitted with this application, as an appendix to the EIAR, detailing the design was carefully considered to ensure the proposed development successfully integrates into, and enhances the character and public realm within and surrounding the site, having regard to topography, its context and setting of key landmarks.

- A3.** *“On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets, and public spaces, using*

massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of the adjoining developments and create visual interest in the streetscape”.

The proposed development provides for the construction of 5 No. apartment blocks ranging in height from 4 to 6 no. storeys, and 3 no. three story duplex blocks, providing 241 no. residential units.

As detailed above, the scale of the proposed development is considered acceptable in the context of the site’s sloped topography and the site’s accessible location adjacent to the high-capacity peak bus service and forthcoming public transport improvements through Busconnects.

As detailed in this Section, the proposed development has been assessed against national, regional and local Planning Policy Documents and is considered to be an appropriate scale.

The proposed landscape designed has been carefully considered to create a sense of place, supporting the urban design layout in the creation of streetscapes and residential spaces. The design strategy aimed to promote sociability, providing places for social interaction and the creation of a sense of community.

The landscape design was designed in tandem with the architectural design of the site, and that of White Pines North. As a result, the landscape components are inherent to the architectural layout of the scheme. The development includes extensive areas of landscape architecture. For further information please refer to Figure 4.7 above, and the Landscape Masterplan, prepared by MA, submitted with this application.

As noted above, the proposed development includes 3 no. three storey duplex blocks to the western boundary of the site. It is considered that a three-storey building in this location provides a suitable progression from the existing 2 storey residential units at White Pines North to the western façade of the 5 storey Block C.

B. At the scale of the district/neighbourhood/street

B1. “The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape”.

As detailed above, the proposed development is considered to be an appropriate scale, responding to the scale of existing and emerging developments in the area.

The development also provides for significant improvements to the public realm, creating a people friendly environment of streets and spaces. The scheme design is further enhanced by a high standard of landscape design and urban spaces.

A range of amenity zones are proposed readily accessible from the residential units, linked through a network of pedestrian routes connecting to form a circuit of open spaces and amenity zones.

Family orientated facilities, including child play spaces will also be provided throughout the site. For further information please refer to the Landscape Report and Landscape Masterplan, prepared by MA.

The main vehicular access to/from the subject development will be provided via Stocking Avenue, on the southern boundary of the site. There will also be a secondary vehicular access to/from White Pines North, via a new junction on the north-western boundary of the site. These vehicular accesses are also accessible to both pedestrian and cyclists. There are additional pedestrian access points located to the south, providing access to Stocking Avenue, and to the north, providing access to the pedestrian / cycle connection. This pedestrian / cycle connection directly connects Stocking Avenue and Scholarstown Road.

- B2.** *“The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered”.*

The development has been carefully designed to avoid long, uninterrupted walls of building in the form of slab blocks and also proposes a range of complementary façade materials, providing a distinct high-quality appearance that successfully integrates with the surrounding streetscape. A variety of buildings, ranging in height from 3 to 6 no. stories, in a mix of apartment and duplex blocks, is provided to add diversity to the scheme design.

For further information please refer to the Architectural Design Statement, prepared by JFA, and Landscape Visual Impact Assessment, prepared by MA, included in the EIAR, submitted with this application.

- B3.** *“The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).*

As detailed above, the proposed landscape and site layout represents a significant enhancement to the urban design context for public spaces and key thoroughfares. The proposal will utilise an existing undeveloped parcel of land and create a high quality urban design response through the provision of publicly accessible spaces and connectivity through the site.

Whilst not located on an inland waterway or coastal area a Flood Risk Assessment has also been undertaken by DBFL in support of the proposed development. We refer the Council to Chapter 10 of the EIAR submitted with this application for further information.

- B4.** *“The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner”.*

The proposed development will make a positive contribution to the legibility of the area. The wider area is largely defined by low rise housing accessed via a series of interconnected roundabouts. The development will provide a distinct residential development in this area that will make a positive contribution to the improvement of legibility of the wider area.

Additional pedestrian and vehicular routes through the site are also proposed to White Pines North, to the north east of the site, this will open up the site to through movement by pedestrians and vehicles with White Pines North.

B5. *“The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood”.*

As noted above, the White Pines East SHD forms part of a wider White Pines Masterplan for the adjoining sites in the ownership of Ardstone Homes Ltd.

<i>Unit Type</i>	<i>North</i>	<i>South</i>	<i>East</i>	<i>Central</i>	<i>Combined</i>	<i>% of Total</i>
1-bed units	-	-	89	c.58	c.147	22%
2-bed units	-	-	152	c.50	c.202	31%
3-bed units	81	41		c.29	c.151	23%
4-bed units	84	48			132	30%
5-bed units	10	17			27	4%
Total Units	175	106	241	c.137	659	100%

Table: Proposed, Provided and Planned Ardstone Homes Residential Developments on Stocking Avenue

As shown in the Table above, the current residential mix is dominated by 3 and 4 bedroom family homes.

The proposed development will provide a mix of one, and two bedroom apartment and duplex units. This mix is proposed to provide greater variety and choice for residents in the area.

In addition to offering a greater selection of house type for new residents, the proposed mix also offers additional choice to existing residents in the area who are looking to downsize/retire to a smaller dwelling. This is in line with current demographic trends for lower occupancy rates and smaller units. The proposed mix will help create a strong and sustainable mixed community in tandem with wider proposed and provided residential sites at Stocking Avenue, identified in the Table above.

C. At the scale of the site/building

- C1. *“The form, massing and height of the proposed development should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light”.*
- C2. *“Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’”.*
- C3. *“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including site specific constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution”.*

We refer the Board to the Sunlight/ Daylight Assessment, prepared by OCSC, submitted with this application, detailing the specific design considerations implemented to maximise access to natural daylight, ventilation, views and minimise overshadowing and loss of light.

The Building Height Guidelines also identify a number of technical assessments which should accompany planning applications, with development proposals for increased building heights. In this regard, we can confirm that all relevant technical assessments have been undertaken in support of the proposed development, as enclosed, including; an EIAR, prepared by TPA, AA Screening Report, prepared by Altermar, and Design Statement, prepared by JFA.

The proposed development meets the requirements for daylight and sunlight as outlined in the accompanying the Sunlight/ Daylight Assessment, prepared by OCSC. The analysis confirms that across the entire development excellent levels of internal daylight are achieved, with a 98.6% compliance rate achieved across the proposed development. The majority of apartments not only meet but greatly exceed the recommendations outlined within the BRE guidelines on “Site Layout Planning for Daylight and Sunlight” and British Standard ‘8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.

In addition to the above, SPPR 4 of the Guidelines relate to the future development of greenfield or edge of city/town locations for housing purposes. SPPR 4 states;

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

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*

3. *avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."*

As noted in Section 4.5 below, the subject site is considered to be located adjacent to a high- frequency Dublin Bus Routes (15 and 15b) and thus can be defined as a 'Central and/or Accessible Urban Location' or an 'Intermediate Urban Location', both of which are appropriate for apartment developments with densities in excess of 45 units per ha.

In addition to this, it is also noted that the proposed development offers a greater mix of building heights, in an area currently dominated by 2-3 storey buildings. The development will also provide a number of 1 and 2 bed apartments, which are currently underprovided for in the area, to provide a greater choice for new and existing residents in the area. The provision of these units in the overall White Pines Masterplan area delivers a more appropriate density across the entire scheme.

It is therefore concluded that the proposed development is in accordance with delivering a sustainable urban development on a greenfield site, in accordance with SPPR4.

4.5 Sustainable Urban Housing: Design Standards for New Apartments 2020

The *Design Standards for New Apartments - Guidelines for Planning Authorities 2020 (Apartment Guidelines)* build upon the provisions of the National Planning Framework in signalling a move away from blanket restrictions on heights in certain locations in favour of an evidence-based approach based on performance criteria.

The *Apartment Guidelines (2020)* provide clear guidance with regard to the types of location which are considered suitable for higher density developments that may wholly comprise apartments. Section 2.4 of the Apartment Guidelines sets out three types of locations, Central and /or Accessible, Intermediate Urban and Peripheral and/or Less Accessible Urban Locations. The proposed development site is located in an area that meets the criteria for Central and /or Accessible Locations and or Intermediate Urban Locations. Table 4.1 below shows how the subject site meets the identified criteria. It is considered that the proposal is only required to meet one of the categories of criteria listed (not all) to meet the relevant location description.

Central and /or Accessible Locations

"Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:"

Criterion	Response
Sites within walking distance (i.e. up to 15 minutes or 1,000 - 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions.	N/A

Criterion	Response
Sites within reasonable walking distance (i.e. up to 10 minutes or 800 - 1,000m) to/from high capacity urban public transport stops (such as DART or Luas);	N/A
Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.	Dublin Bus's 15b bus service runs 10 minute peak hour frequency ² and is located adjacent the site's entrance on Stocking Avenue.

Table 4.1: Demonstration of compliance with Central / Accessible Urban Location criteria

Intermediate Urban Locations

"Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:"

Criterion	Response
Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;	Whilst the site is not located within walking distance of a principal town or suburban centre it is located adjacent to a recently permitted Neighbourhood Centre, South Dublin Ref. SD19A/0345, c. 30m southwest of the application site, shown in Figure 1.1 above.
Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;	Dublin Bus's 15b bus service, located at the site's entrance, runs 10 minute peak hour frequency ³ . In addition, the site is also located c.1km east of Dublin Bus' Route No. 15 and emerging public transport connections proposed under BusConnects. The site is also located within 1000m of other less frequent bus routes such as the 16.
Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus service	Dublin Bus's 15b bus service runs 10 minute peak hour frequency ³ . In addition to this the site is also located within 800m of Dublin Bus' Route No. 15 and emerging public transport connections proposed under BusConnects.

Table 4.2: Demonstration of compliance with Intermediate Urban Location criteria

The subject site meets the above criteria given its proximate location adjacent to a high-frequency Dublin Bus Routes (15 and 15b) and thus can be defined as a 'Central and/or Accessible Urban Location' or an 'Intermediate Urban Location', both of which are appropriate for apartment developments with densities in excess of 45 units per ha.

The Apartment Guidelines set out a number of Specific Planning Policy Requirements (SPPRs) which;

² <https://www.dublinbus.ie/Your-Journey1/Timetables/All-Timetables/15b2/>

“take precedence over any conflicting, policies or objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.” (Para 1.20 refers.) (Our emphasis)

In this regard, we have assessed the proposal against the relevant SPPRs contained within the Apartment Guidelines.

SPPR 1 (Housing Mix) states;

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

The Proposed development complies with SPPR 1 as it includes 241 no. apartments and duplex units, 38.6% (93 no.) 1 bedroom units and 61.4% (148 no.) 2 bedroom units.

SPPR 2 (Small Urban Infill Sites) does not apply to the subject site as the site (2.98 hectares) is larger than 0.25 hectares identified in SPPR2.

SPPR 3 (Minimum Areas)

SPPR3 of the Apartment Guidelines 2020 state that the following minimum floor areas for apartments apply:

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

Section 3.8 (a) of the Apartment Standards Guidelines states:

“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, & 3 bed unit types, by a minimum of 10%.”

As noted in the Schedules Report, prepared by JFA, the majority of the 241no. residential units proposed exceed the minimum floor area standard by a minimum of 10%.

The proposed development complies with the minimum apartment floor area requirements set out in SPPR3. The Schedules Report, including a Housing Quality Assessment, and Architectural Drawings prepared by JFA Architects demonstrates that the proposed development complies and exceeds the standards outlined above.

SPPR 4 (Dual Aspect) sets out the minimum number of dual aspect apartments that should be provided for in any single apartment scheme, noting the following shall apply:

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate”.*
- (ii) ***In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***

All proposed units have been designed to maximise the extent and quantum of dual aspect units within the scheme. Conservatively including the site as a ‘Intermediate Urban Location’ means that there shall be a minimum of 50% dual aspect apartments in the scheme. Overall, the location and design of all Blocks is considered to maximise the extent of dual aspect apartments units within the scheme, where 55% of units are dual aspect.

In this case, some 133 no. apartments are dual aspect. This represents c.55% (133/241) of the units proposed. Therefore, c.45% (108/241) of the apartment units within the scheme are single aspect. These units are primarily south and westerly facing, and thus considered appropriate in the context of the above standards.

SPPR 5 (Floor to Ceiling Height) specifies that,

“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”.

All ground level apartment floor to ceiling heights are a minimum of 2.7m and are fully compliant with SPPR 5 of the Guidelines.

SPPR 6 (Apartments per Floor per Core – Subject Proposal Complies)

SPPR 6 states:

“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 0.25 ha, subject to overall design quality and compliance with building regulations.”

The maximum of 10 No. apartment units per floor per core are provided through the Subject Proposal. As such, the subject proposal is compliant with SPPR 6.

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

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

<i>Subject Proposal is Fully Consistent with Provisions of the Design Manual for Urban Roads and Streets (2013)</i>
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A detailed statement with regard to employment of DMURS standards, prepared by DBFL Consulting Engineers, is provided separately as part of this application.

4.7 The Planning System and Flood Risk Management (2009)

The key stated objectives of the Guidelines are set out at Table 1.6:

The core objectives of the Guidelines are to:

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

In addition, the Guidelines recommend a staged approach, whereby flood risk is first identified; then an initial assessment is undertaken, followed by a detailed flood risk assessment. The subject proposal accords in full with this approach insofar as the following steps have been taken:

- Stage 1: Flood Risk Identification
- Stage 2: Initial Flood Risk Assessment
- Stage 3: Detailed Flood Risk Assessment

Table A2 of the Guidelines sets out the various levels of flood risk assessment appropriate to different types of development proposal. For a proposed development on an identified site such as the subject proposal, a site-specific flood risk assessment is appropriate. As per the Guidelines, this should assess all type of flood risk, the likely impacts of same and offer mitigation measures and identify any residual risks remaining.

Chapter 5 of the Guidelines states that, where appropriate, planning applications should be accompanied by a detailed flood risk assessment.

Subject Proposal is Fully Consistent with Provisions of the Planning System and Flood Risk Management (2009)

In this regard, a Site Specific Flood Risk Assessment (including Justification Test) prepared by DBFL Consulting Engineers has been submitted with this application, included at Chapter 10 of the EIAR. This is fully consistent with the outline approach set out in Section 5.9 of the Guidelines.

This finds that the proposed development has the required level of protection up to and including a 1:100 year event, and that overland paths can accommodate pluvial flooding exceeding the capacity of the surrounding drainage network.

It is also noted that the EIAR accompanying the subject application includes a comprehensive assessment in respect of, inter alia, Water, Land Use and Interactions.

4.8 Sustainable Residential Development in Urban Areas (2009)

The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (The Guidelines) is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;
- Provide a mix of land uses to minimise transport demand.

The Guidelines also 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 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.

Section 3.14 of the Guidelines outlines the following factors as integral in influencing design and layout of streets in residential areas:

- Connectivity & Permeability
- Sustainability
- Safety
- Legibility
- Sense of Place

The Guidelines support a plan-led approach to development as provided for in the Planning and Development Act 2000 [as amended]. Section 2.1 of the Guidelines note that;

'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'.

The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 and;

'the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...'

Section 5.4 of the Guidelines notes appropriate locations for increased residential densities, including;

“To maximise the return on this investment, it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors.”

The guidelines further note, regarding the development of Greenfield Sites;

“These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. (see Section 5.11)

With respect to amenity / open space, Section 4.15 of the Guidelines acknowledges that public open space is a key contributing factor to the quality of a residential development and that it can foster a community spirit and a sense of identity.

Section 4.20 sets out the recommendations in respect of quantitative standards for public open space. In respect of greenfield sites such as the subject site, the Guidelines recommend the following:

“In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community.

Subject Proposal is Fully Consistent with Provisions of the Sustainable Residential Development in Urban Areas (2009)

The proposed development is considered to be entirely in accordance with the provisions of the *Sustainable Residential Development in Urban Areas (2009)* guidelines by proposing a development, designed to respect the built form of existing and emerging developments on Stocking Avenue, with a density appropriate to its urban context, and, providing enhanced residential internal and external amenity spaces, that supports the local zoning objective of the site, to provide new residential development.

With regard to appropriate residential densities, Section 5.9 of the Guidelines acknowledges the opportunity for the re-development of Greenfield lands to higher densities, in particular, sites close to existing public transport corridors. With respect to these standards, the net density of the subject proposal is c.81 units per hectare and so is fully consistent with the Guidelines.

White Pines Residential Phases	No. of units	Site Area	Dwellings per Ha
1. White Pines North	175	6.17	28.3
2. White Pines South	106	2.83	37.45
3. White Pines Retail	N/A	N/A	N/A
4. White Pines East	241	2.98	80.9
Subtotal	522	11.98	43.57
Forthcoming Planning Applications			
5. White Pines Central SHD	c.137	2.2	62.27
TOTAL	659	14.18	46.47

Table: White Pines Masterplan Site Densities

As noted in the Table above, the subject application at White Pines East comprises the 4th Phase of development for the White Pines Masterplan Site. As a result of the subject application the proposed development at White Pines East SHD will result in an overall residential density for the White Pines masterplan site of c 43.57 units per Ha.

It is also noted that the 5th and final phase of the residential development at the White Pines Masterplan site, White Pines Central SHD, will result in an overall site density of c. 46.5 dwellings per hectare.

An external public open space arrangement is proposed which would provide for flexible recreation space; for social interaction and active play, combined with spaces that are quiet and calming and spaces that are accessible and inclusive for all ages and abilities.

Regarding the provision of Public Open Space, the proposed Landscape Masterplan provides 5 no. residential apartment blocks, and 3 no. three storey duplex blocks, linked through a series of pedestrian routes through the site, connecting the residential units to a large quantum of publicly accessible open space c. 11,392sq.m, representing c.38% of the total site area.

The proposed development incorporates design principles such as to reduce traffic. The layout is highly accessible for all users, with a permeable layout both internally and externally as new linkages are provided to surrounding residential areas, including White Pines North and also connections to Stocking Avenue, north of the site to White Pines South and the wider masterplan site. The layout is considered to be legible, with a clear distinction in design, character and treatment.

4.9 Urban Design Manual: A Best Practice Guide (2009)

The Urban Design Manual: A Best Practice Guide (2009) compresses the various design features integral to good residential development into 12 no. criteria:

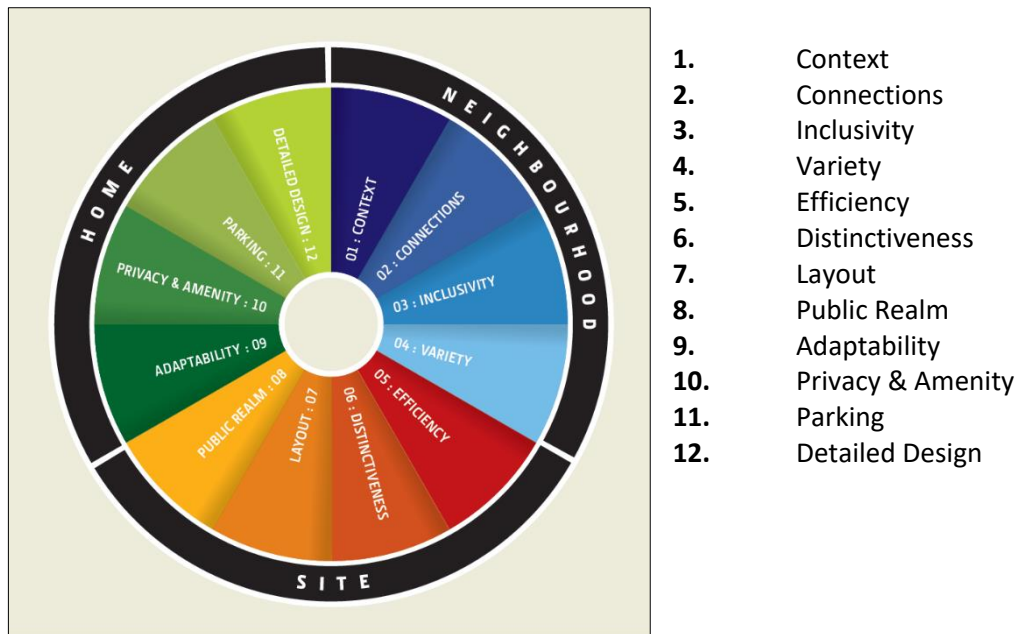


Figure 4.2: Design Breakdown [Source: *Urban Design Manual, 2009; p. 9*]

Subject Proposal is Fully Consistent with Provisions of the Urban Design Manual: A Best Practice Guide (2009)

The 12 criteria of the *Urban Design Manual: A Best Practice Guide (2009)* have been informing elements at all stages of the subject proposal, from the original design concept through design iteration and consultation to the subject final proposal.

With particular respect to the site-specific issues, the subject proposal has been designed to maximise the achievable density appropriate for this site.

The proposed development will include large landscaped amenity open space throughout the application site which will be adaptable and flexible to meet the needs of residents of all ages.

Permeability is achieved through the site from the proposed primary access at Stocking Avenue, on the south western boundary. Additional pedestrian and cycle access points will also be provided along Stocking Avenue and from White Pines North to the west.

Creating a people-friendly layout has been inherent to the proposed scheme design. The approach to the site layout and landscape masterplan prioritises non-vehicular traffic on internal roads with pedestrian desire lines catered to.

In short, the proposal's response to the various criteria set out by the Guidelines, including the 12 no. design criteria summarised as follows:

Context

The layout of the proposal seeks to maximise the location of the site, its sloping topography, and also takes advantage of the views looking towards the city.

Connections

This new residential area will connect with existing areas to the west and south through the provision of increased pedestrian entry points to the site.

Inclusivity

The provision of a landscaped amenity space with various character areas (e.g. landscaped buffer zone (wild grasses); kickabout / key public realm nodes; and children's play area) will cater for a wide range of future users.

Variety

A mix of one-bedroom and two-bedroom apartment and duplex units is proposed to provide to introduce a wider variety of users, within an area currently dominated by three-bedroom and four-bedroom detached and semi-detached housing. This will help create a strong and sustainable mixed community in tandem with the permitted developments also forming part of the White Pines Masterplan Stie.

Efficiency

The proposed layout is predicated on the need to avoid unnecessary cut and fill, as set out in the Ballycullen-Oldcourt LAP 2014. The proposal will link into and make the most efficient use of existing services and infrastructure in the locality.

Distinctiveness

The proposal has taken a sensitive approach to design given the site's setting. Its distinctive sloped topography is respected and emphasised through the high quality of the design proposal, with building heights increasing to the lower point of the site, at the northern boundary where the site borders the M50.

Layout

The site layout prioritises non-vehicular movement on internal streets, with pedestrian desire lines catered to, and non-essential vehicular through-movement minimised.

Public Realm

The passive surveillance of public spaces is prioritised throughout the scheme design. Variety is achieved between the character of public open space areas within residential development.

Adaptability

Unit types are designed to be adaptable and capable of catering for cross-generational use.

Privacy & Amenity

All apartment and duplex units enjoy dedicated private open space in the form of balconies which are not unduly overlooked.

Parking

Proposal provides 194 no. dedicated private parking spaces to serve the proposed residential units. 10 no. additional spaces are also provided to serve the Community Centre.

Detailed Design

The design of the proposal has been and will continue to be a collaborative effort with the various opportunities and constraints addressed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, and planning expertise) in an iterative manner.

The proposal has also been informed by the expert inputs of the various consultants involved in the preparation of the application to ensure that appropriate mitigation / avoidance measures are 'designed into' the scheme from the outset.

The residential layout has been expressly informed by the need to provide a development which responds to the site's topography whilst also achieving strong street definition and passive surveillance of the landscaped open space.

4.10 Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)

In 2016, the Government launched Rebuilding Ireland which targeted solutions to the ongoing supply issues in the residential sector in the country. The overarching aim of this Action Plan is to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation.

This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.



Figure 4.3: Five Pillars of the Rebuilding Ireland Action Plan

Subject Proposal is Fully Consistent with Provisions of Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)

The development proposed will directly contribute to Pillar 2 seeking to 'Accelerate Social Housing', and Pillar 3 which seeks to 'Build More Homes'. 241 no. residential dwellings are proposed in a mix of 1 and 2 bed units, in a range of types and sizes to fit a broad tenure demand.

The scheme will also assist in Pillars 1 and 2 which seek to 'Address Homelessness' and 'Build More Homes', respectively.

5.0 STATUTORY LOCAL PLANNING POLICY

5.1 Framework

This section of the planning report provides an account of the relevant local planning policy framework provided primarily by the South Dublin County Development Plan (*SDDP*) 2016 – 2022 and the Ballycullen Oldcourt LAP 2014.

The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence-based “Core Strategy” (CS) to be incorporated as part of County Development Plans. The purpose of a Core Strategy is to articulate a medium-to longer term quantitative-based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional development objectives as set out in the *National Spatial Strategy 2002-2022* (NSS) and *Regional Planning Guidelines 2010-2022* (RPGs).

The central focus of the Core Strategy is on residential development and ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for residential development and the projected demand for new housing during the lifetime of the Plan.

5.2 Local Planning Documents

5.1.1 South Dublin County Council Development Plan

The *South Dublin County Council Development Plan (SDDP) 2016 -2022* was published on June 12th 2016. The plan has been subject to a number of amendments, the latest, Variation 5, came into effect on 9th December 2019.

As such, the *SDDP 2016-22* remains a statutory plan for the area and will guide all future development relating to the subject lands, with consideration also given to the *Ballycullen-Oldcourt Local Area Plan 2014*.

5.1.2 Ballycullen-Oldcourt Local Area Plan 2014

The *Ballycullen-Oldcourt Local Area Plan (BOLAP) 2014*, which became operative in June 2014, and was later amended which came into effect in June 2017. In 2019 the LAP was extended, and will now expire on 2nd June 2024.

As such, it remains a statutory plan for the area and will guide all future development relating to the subject lands, with consideration also given to the *SDDP 2016-2022*.

5.3 Local Planning Policy Compliance

The following section will detail how the proposed development is in accordance with the local planning policies, objectives and development management considerations as set out in the *SDDP 2016-22* and the *BOLAP 2014*.

5.3.1 Development Strategy: Ballycullen/Oldcourt

- **SDDP 2016-22**

The subject site is located within “Consolidation Areas within the Gateway” (see Figure 5.1) which refers to the established suburban areas between the ‘Gateway Core’ and the ‘Metropolitan Consolidation Towns’.

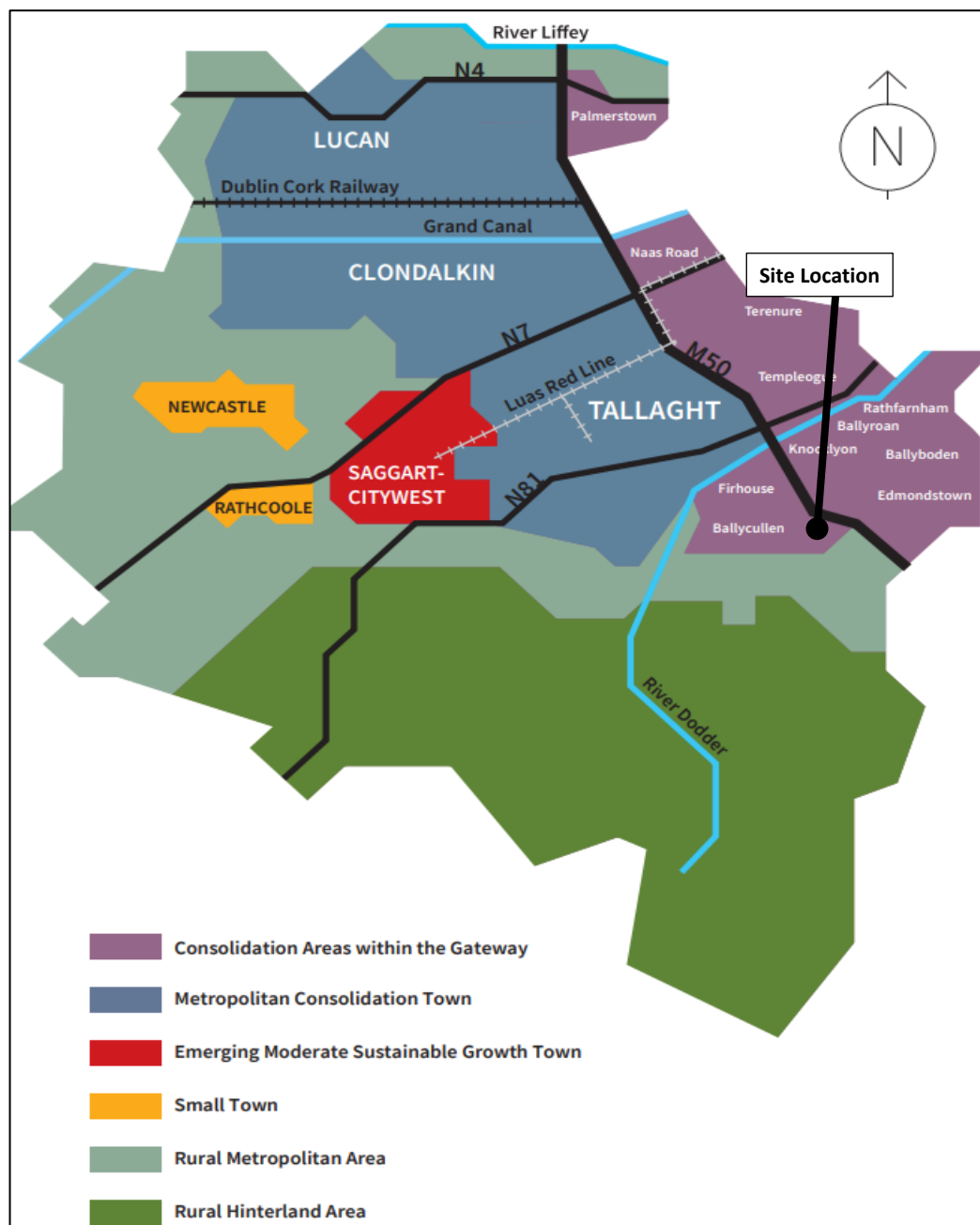


Figure 5.1: South Dublin City Development Plan Core Strategy Map. (Source: South Dublin County Development Plan, 2016-22, p. 10. Annotated by TPA 2021)

As shown in Figure 5.2, the *South Dublin Development Plan (SDDP) 2016-22* forecasts the population to increase by 6,102 people within this ‘Gateway Core’ by 2022.)

HIERARCHY	TOTAL LAND CAPACITY (HA)	TOTAL HOUSING CAPACITY (NO.S)	% TOTAL IN EACH SETTLEMENT	2011 POP	POTENTIAL POP (2011 & FORECAST 2022)	INFRASTRUCTURE COMMENT
Consolidation Areas within the Gateway						
Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Knocklyon, Firhouse/ Ballycullen and parts of Greenhills, Terenure and Rathfarnham	295	9,620	24%	89,752	95,854	No significant road, water supply or drainage constraints. Proposed high capacity transport projects (BRT) would increase capacity of zoned lands.

Figure 5.2: Extract of South Dublin County Development Plan Total Housing Capacity (Source: South Dublin County Development Plan, 2016, Table 1.10, p. 17)

The following objectives, set out in the *SDDP 2016-22*, relating to Settlement Strategy.

Core Strategy Policy 1 of the *SDDP 2016-22* states;

“It is the policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder.”

Objective 3 of Core Strategy Policy 1 seeks;

“To promote and support the development of undeveloped zoned lands and promote pre-application consultation in accordance with Section 247 of the Planning and Development Act 2000 (as amended).”

- **BOLAP 2014**

The settlement strategy for the Ballycullen area is set out in Section 1 of the Local Plan as follows;

“The Strategy The overall objective of the LAP is to provide a development framework with residential densities appropriate to the unique location of the lands on the suburban edge of the Dublin Mountain foothills. The Plan provides for the construction of approximately 1,600 additional dwellings (about 4,600 persons) at a range of densities appropriate to the area.

The strategy complies with the requirements of the Core Strategy of the County Development Plan 2010 – 2016 and that of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). The phasing element provides for the required community, school and parkland facilities either prior to or in tandem with additional residential dwellings. The combined development strategies integrates planned residential neighbourhoods with natural and built heritage features, water management systems, improved accessibility, open spaces and recreational facilities. This includes for a network of walking and cycling routes that will link residential blocks with each other, public transport stops and local shopping while providing routes towards the Dublin Mountains.

Subject Proposal is Fully Consistent with the Settlement Strategy of the SDDP 2016-22 Core Strategy:

Pre-Planning consultation was undertaken with South Dublin County Council (SDCC) and An Bord Pleanála (ABP) during the pre-application consultation stage of the subject SHD application (ABP Ref. ABP- 307307-20). For further information please refer to the *Response to ABP Opinion*, prepared by TPA, submitted with this application.

The provision of 241 no. residential units along with associated landscaped amenity space accords in full with the settlement strategy set out in the *SDDP 2016-22* and the *BOLAP 2014*.

The proposed development will meet the strategic objectives, by meeting the County's projected housing needs (as set out in the *BOLAP 2014*) in this designated 'Consolidation Area within the Gateway'.

5.3.2 Site-Specific Objectives

- ***SDDP 2016-22***

As shown in Figure 5.2 below, the entire site is zoned for 'new residential communities', in the SDDP 2016-22. The zoning objective for this is;

"To protect and/or improve residential amenity"

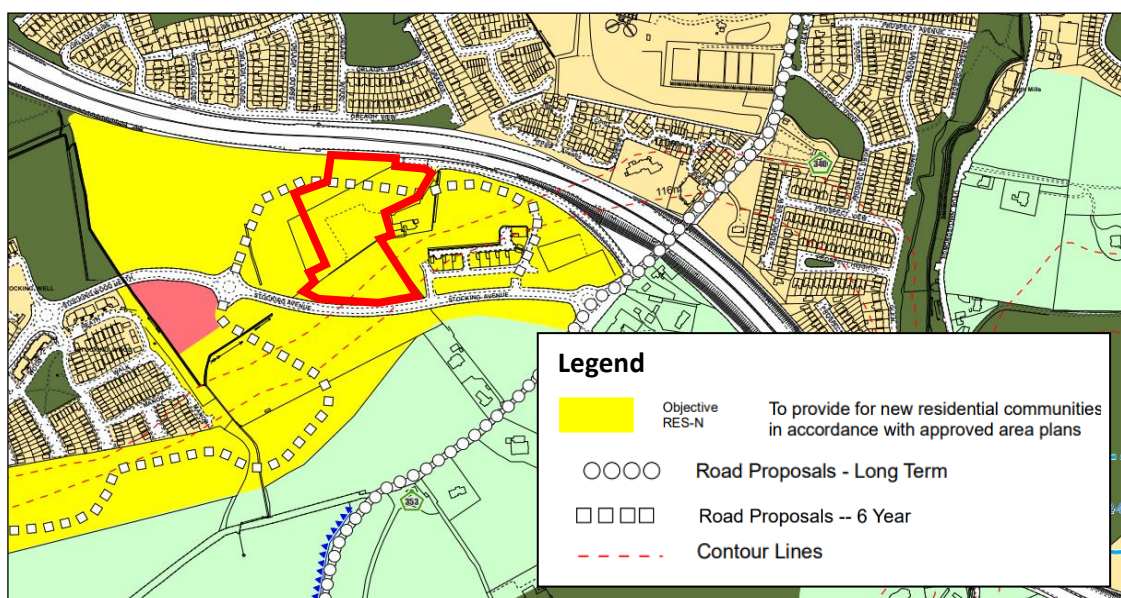


Figure 5.3: Zoning Map SDDP 2016-22, Application Site Outlined Red (cropped and annotated by TPA, 2021)

The Land Use Zoning Matrix for lands Zoned RES-N, notes the uses permitted in principle, and also those open to consideration.

Use Class	Uses
Permitted in Principle	Housing for Older People, Nursing Home, Open Space, Public Services, Residential , Residential Institution, Retirement Home, Shop-Local, Traveller Accommodation.
Open to Consideration*	Advertisements and Advertising Structures, Allotments, Agriculture, Bed & Breakfast, Betting Office, Camp Site, Car Park, Caravan Park-Residential, Cemetery, Childcare Facilities, Community Centre , Crematorium, Cultural Use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Hotel/Hostel, Home Based Economic Activities, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Off-Licence, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Recreational Facility, Recycling Facility, Restaurant/Café, Service Garage, ShopNeighbourhood, Sports Club/Facility, Stadium, Veterinary Surgery.

Table 5.3 – ‘RES’ Land Use Zoning Matrix (Source: SDDP 2016-2022, Table 11.2)

- **BOLAP 2014**

The site is the subject to zoning objectives set out in the Ballycullen-Oldcourt Local Area Plan. The subject site is zoned ‘A11, the zoning objective for this designation state;

“To provide for new Residential Communities in accordance with approved Area Plans”

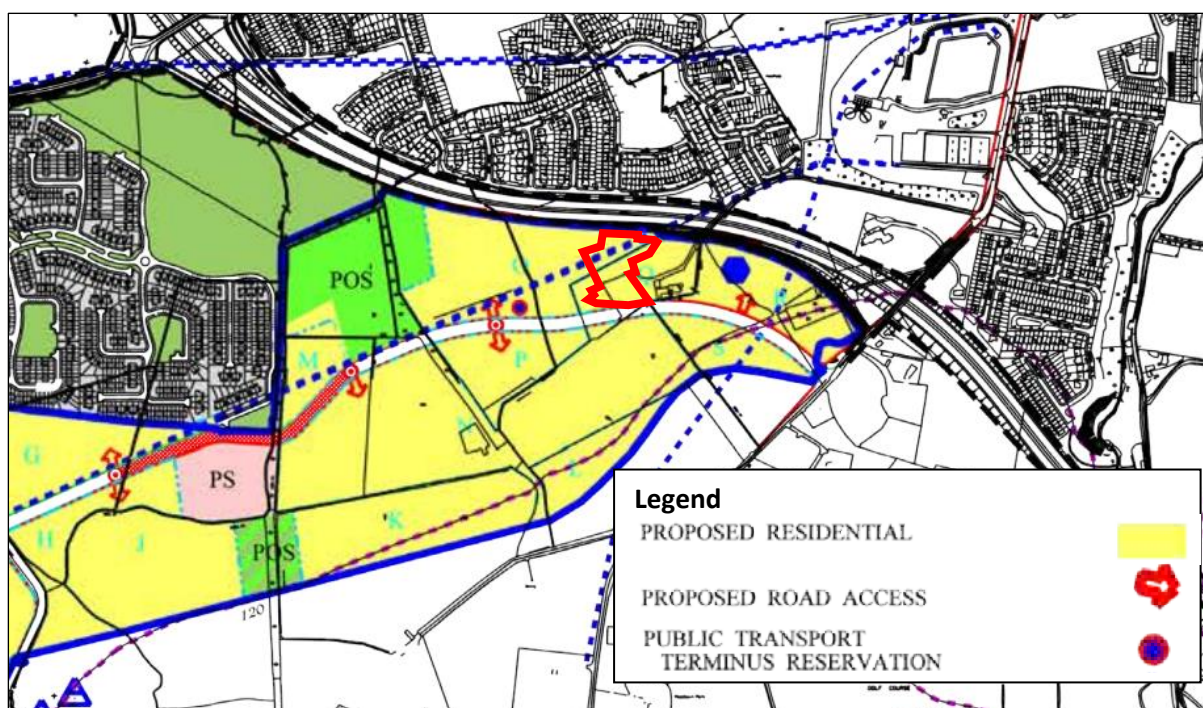


Figure 5.4: Land Use Zoning Map Ballycullen-Oldcourt LAP 2014, Application Site Outlined Red (cropped and annotated by TPA, 2021)

Subject Proposal is Fully Consistent with the Local site specific zoning objective for the application site

The proposed use of the site, for residential development is entirely in accordance with the site’s zoning objective.

5.3.3 Social Housing Requirement

- **SDDP 2016-22**

Social housing policies and objectives contained within the *SDDP 2016-22*, are set out as follows;

***H1 Objective 2:** It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022."*

***H1 Objective 7:** To meet the County's need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, leasing, Housing Assistance Payment (HAP) scheme, Rental Accommodation Schemes (RAS) and the utilisation of existing housing stock. This should include for the provision of one bedroom units for homeless housing need.*

***H1 Objective 8:** To ensure an adequate provision of social housing across the County through the facilitation of the transfer of lands and other appropriate mechanisms with third parties to ensure an appropriate distribution of new social housing, and to avoid additional concentration of social housing above that already in existence."*

- **BOLAP 2014**

Social/Affordable housing is guided by the policies and objectives, set out in the *SDDP 2016-22*, as detailed above.

Subject Proposal is Fully Consistent with the Local Social Housing Requirement for the Application Site

The Applicant has engaged in consultation with the Housing Section of SDCC and has reached agreement on how the Part V units will be agreed and delivered. A response to this was received from Philomena O'Rourke, Senior Staff Officer, Part V, SDCC Housing Department.

The Applicant agrees to accept a condition attaching to a grant of planning permission, if An Bord Pleanála is minded to approve the proposed development, which requires the Applicant to enter into a Part V agreement with SDCC as per their requirements, prior to the commencement of development, as detailed in SDCC's response.

RESIDENTIAL DESIGN STANDARDS

5.3.4 Residential Design and Layout

- **SDDP 2016-22**

The following Policies/Objectives from the *SDDP 2016-22* have informed and guided the design of the proposed development.

"HOUSING (H) Policy 7 Urban Design in Residential Developments: *It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).*

H7 Objective 1: *To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

H7 Objective 2: *To ensure that residential development provides an integrated and balanced approach to movement, place-making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).* **H7 Objective 3:** *To support public realm improvements as part of infill developments.*

HOUSING (H) Policy 11 Residential Design and Layout: *It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*

H11 Objective 1: *To promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation."*

- **BOLAP 2014**

The following Policies/Objectives from the BOLAP 2014 have informed and guided the design of the proposed development.

Objective BF1: *Development shall be arranged into a series of perimeter blocks that present strong building frontages to surrounding streets especially at street corners with rear gardens enclosed within each residential block to the rear and parking/service areas enclosed to the side and/or rear of commercial, community and school developments. Rear gardens, blank facades and service areas shall not interface with any streets or spaces.*

Objective BF2: *Block lengths within the Lower Slope Lands should be no more than 80 metres. Plot widths for dwellings in this area should vary between 5 metres and 9 metres and dwellings depths should be no more than 10 metres.*

Objective BF3: *Block lengths within the Mid Slope Lands should be no more than 100 metres and no more than 120 metres within the Upper Slope Lands.*

Objective BF5: *All development including streets, buildings and spaces shall be laid out to comply with South Dublin County Council Development Plan policy on steep sites and shall be designed to circumvent the need for retaining walls and significant alterations to topography such as the cutting and filling of platforms in the landscape.*

Objective BF6: *Residential development within the Lower Slope Lands and all community, retail and school development shall present strong building frontages located close to*

street edges with a fine urban grain and on-street parking. Dwellings within the Mid Slope lands shall have a mixture of strong and set-back built frontages with on-street and in-curtilage parking. Dwellings on the Upper Slopes shall have softer frontages set back from the street edge behind planted front gardens that incorporate in-curtilage parking.

Response

The proposed scheme has been designed in compliance with the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the Urban Design Manual 2009 and the Design Manual for Urban Roads and Streets as outlined in Section 5 of this Statement.

The proposed site layout and scheme design has been developed in compliance with the standards provided for in Chapter 11 of the Development Plan and Part L of the Building Regulations. For further information please refer to Section 4 above.

5.3.5 Residential Densities.

- **SDDP 2016-22**

The following policies/objectives, relating to residential densities, are set out in the *SDDP 2016-22*.

"H8 Objective 1: To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."

"H8 Objective 2: To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."

"H8 Objective 5: To ensure that developments on lands for which a Local Area Plan has been prepared comply with the local density requirements of the Local Area Plan."

"H8 Objective 6: To apply the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) relating to Outer Suburban locations, including a density range of 35-50 units per hectare, to greenfield sites that are zoned residential (RES or RES-N) and are not subject to a SDZ designation, a Local Area Plan and/or an approved plan, excluding lands within the M50 and lands on the edge or within the Small Towns/ Villages in the County. BOLAP 2014

- **BOLAP 2014**

The following objectives relating to residential Density are set out in the *BOLAP 2014*.

Objective LUD1: The density of development shall accord with that indicated under Table 5.4 and Figure 5.3 of this Local Area Plan (Section 5.4). The extent and density of development indicated for Options A and B on Figure 5.3 shall only be permissible where development is generally carried out in accordance with this LAP and, in the case of Option A, existing 220kV overhead electrical transmission lines are rerouted to coincide with the wayleaves of existing watermain.

BOLAP 2014 Objective LUD5: Residential development within the Lower Slope Lands shall consist of medium to low density (32 – 38 dwellings per ha./13 – 15 per acre) terraced and semi-detached housing. New development adjacent to existing housing shall be designed sensitively to protect existing residential amenity.

BOLAP 2014 Objective LUD6: Residential development within the Mid Slope Lands shall consist of low density (22 – 28 dwellings per ha./9 – 11 per acre) development comprising semi-detached and terraced housing of no more than 2 storeys. Additional split-level floors may be acceptable where they are justified on the basis of topography, are sensitively incorporated into the slope of the lands and do not increase the height of dwellings from street level to more than 2 storeys.

BOLAP 2014 Objective LUD7: Residential development within the Upper Slope Lands shall consist of very low density (12 – 18 dwellings per ha./5 – 7 per acre) development comprising single storey detached and semi-detached housing. Additional split-level floors may be acceptable where they are justified on the basis of topography, are sensitively incorporated into the slope of the lands and do not increase the height of dwellings to more than 1 storey from street level and by no more than 2 storeys from the side and rear. Dormer window structures shall only be permissible for single storey dwellings and must be within the structure of the main roof, below its ridge level and above its eaves line (at least approx. 3 tile courses). Densities adjacent to the green buffer along the southern fringe should be provided at the lower end of the scale (approx. 12 dwellings per hectare).



Figure 5.5: Ballycullen Oldcourt LAP 2014, annotated by TPA 2021

Table 5.4 of the *BOLAP 2014* sets out the Required Densities based on the 'Landscape Area' (i.e. Lower Slope, Mid-Slope and Upper Slope Lands) as follows;

- Lower Slope Lands 32 – 38 dwellings per Ha
- Mid-Slope Lands 22 – 28 dwellings per Ha
- Upper Slope Lands 12 – 18 dwellings per Ha

Response

As noted in the Table below, the subject Application at White Pines East SHD represents the 4th Phase of development for the wider White Pines Masterplan Site. It is therefore considered, in the interest of providing a balanced and sustainable community with a mix of tenure types and housing, the proposed development should be assessed as a component of the wider White Pines Masterplan development.

White Pines Residential Phases	No. of units	Site Area	Dwellings per Ha
1. White Pines North	175	6.17	28.3
2. White Pines South	106	2.83	37.45
3. White Pines East	241	2.98	80.9
Subtotal	522	11.98	43.57
Forthcoming Planning Applications			
4. White Pines Central SHD	c.137	2.2	62.27
TOTAL	659	14.18	c.46.5

Table: White Pines Masterplan Site Densities

As noted above, as a result of the subject application the proposed development at White Pines East SHD will result in an overall residential density for the White Pines masterplan site of c. 43.6 units per Ha.

It is also noted that the 4th and final phase of the residential development at the White Pines Masterplan site, White Pines Central SHD, will result in an overall site density of c.46.5 Dwellings Per Hectare.

This density will make efficient use of existing and planned infrastructure and services in the area due to its proximity to district centres such as Woodstown, Ballycullen and Firhouse.

Local Policy H8 Objective 5 states that development on lands for which a Local Area Plan has been prepared should comply with the local density requirements of the Local Area Plan.

As shown in Figure 5.5, the subject lands are located on Lower, Mid and Upper-Sloped Lands. The *BOLAP 2014* which informs development at the subject site prescribes potential densities of 12-38 units per hectare on lower, mid and upper sloped lands.

It is submitted that a material contravention of the *SDDP2016-22* and *BOLAP 2014* (see section 4.1 of this report) occurs as a result of the subject proposal. A Material Contravention Statement, prepared by TPA, accompanies this planning application and

demonstrates how An Bord Pleanála is justified to grant permission for the scheme having regard to Section 37(2)(b) of the Planning and Development Act 2000 (as amended).

5.3.6 Residential Mix

- **SDDP 2016-22**

The following Policies/Objectives from the *SDDP 2016-22* have been identified as relevant to the proposed development relating to the proposed residential mix.

***“H10: Objective 1:** It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.”*

***H3 Housing for Older People:** It is the policy of the Council to support the provision of accommodation for older people in established residential and mixed use areas that offer a choice and mix of accommodation types to older people (independent and semi-independent living) within their communities and at locations that are proximate to services and amenities.*

- **BOLAP 2014**

Local Policy LUD3 of the *BOLAP 2016-22*, states;

The permissible dwelling mix shall yield a minimum of 90% or more houses. Apartment and duplex units are not permissible on the Upper Slopes of the Plan Lands. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this objective.

Response

The proposed development provides a mix of one-bedroom and two-bedroom apartments totalling 241 no. units. This includes 93 no. one bed units and 148 no. two bed units, which is considered to be positive addition as these unit types are currently limited within the local area.

<i>Unit Type</i>	<i>North</i>	<i>South</i>	<i>East</i>	<i>Central</i>	<i>Combined</i>	<i>% of Total</i>
1-bed units	-	-	89	c.58	c.147	22%
2-bed units	-	-	152	c.50	c.202	31%
3-bed units	81	41		c.29	c.151	23%
4-bed units	84	48			132	30%
5-bed units	10	17			27	4%
Total Units	175	106	241	c.137	659	100%

Table: Proposed, Provided and Planned Ardstone Homes Residential Developments on Stocking Avenue

As shown above, residential units will be primarily provided in a mix of one-bedroom and two-bedroom apartment and duplex units at White Pines East SHD. This mix is proposed to provide greater variety and choice for residents within an area dominated by three-bedroom and four-bedroom detached and semi-detached housing. The proposed mix will help create a strong and sustainable mixed community in tandem with wider proposed and provided residential sites at Stocking Avenue, identified in the Table above.

It is also noted that north of the planning applicant site, in the residential areas of Orlagh and Airpark North of the M50, there exists a significant quantum of traditional 3-5 bed homes. There are also further areas of traditional 3-5 bed housing within the wider Ballycullen area.

As such, in the interest of providing a comprehensive housing mix for the wider area, responding to local demand, the proposed residential mix is considered entirely in line with the proper planning and sustainable development of the area by providing a development comprising 1 and 2 bed units.

The proposed development will therefore contribute to the overall residential mix within the wider area and facilitate a range of household sizes.

The proposed mix has been carefully selected to offer greater choice to new and existing residents. In addition to offering a greater selection for new residents, the proposed mix also offers additional choice to existing residents in the area who are looking to downsize/retire to a smaller dwelling.

It is submitted that a Material Contravention of the Local Area Plan occurs as a result of the subject proposals. A Material Contravention Statement accompanies this planning application and demonstrates how An Bord Pleanála is justified to grant permission for the scheme having regard to Section 37(2)(b) of the Planning and Development Act 2000 (as amended). Please refer to Section 5.3 of the Material Contravention Statement, prepared by TPA.

5.3.7 Public Open Space

- **SDDP 2016-22**

Local Policy H12 Objectives 1 & 2: Public Open Space, state;

***“HOUSING (H) Policy 12 Public Open Space:** It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.*

***H12 Objective 1:** To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

***H12 Objective 2:** To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.”*

***Local Policy, G2 Objective 5, 11, Green Infrastructure,** states: To integrate Green Infrastructure as an essential component of all new developments.*

***G2 Objective 11:** To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.*

Section 11.3.0 sets out quantitative standards for the provision of Public Open Space

The Planning Authority will require public open space to be provided as an integral part of the design of new residential and mixed use developments.

- *A detailed Landscape Plan that outlines the extent of open space and details for its treatment will be required with residential developments of 10 units and above.*
- *In areas that are designated Zoning Objective RES-N all new residential development shall be required to incorporate a minimum of 14% of the total site area as public open space;*
- *In all other zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space. This includes community led housing for older people in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities). (Section 11.3.0)*

- **BOLAP 2014**

The following Policies and Objectives of the BOLAP 2014 relate to the provision of public open space:

Objective GI24: Upgraded and new tracks and trails should correspond with ditches, streams, surface water attenuation areas and aid in the creation of a permeable network of linked open spaces including green corridors, green buffers, neighbourhood parks, wetland areas and playing pitches. Tracks and Trails should incorporate mitigating measures that protect flora, fauna and habitats through sensitive design, lighting and construction.

Objective GI31: Development along and near the boundary with the M50 motorway shall include a green corridor and wetland area that will mitigate against noise through the planting of semi-mature trees and incorporation of soft landscaped mounding/berms. Narrowed areas of this buffer shall be no less than 20 metres in width. All planning applications for development in close proximity to the M50 should be accompanied by a report, prepared by a qualified person, detailing noise levels and mitigating measures for noise.

Objective GI32: All residential development shall contribute to the creation of the planned network and hierarchy of open spaces.

Objective GI34: Neighbourhood Parks shall be designed to operate as passive and active amenity spaces with extensive SUDS attenuating and storage features (ponds, basins, reed beds etc) that will act as landscape features and link with an overall SUDS network for the Plan Lands.

Objective GI35: Residual, narrow and incidental areas of open space with no role or function shall not be included in the calculation of open space provision.

Objective AM9: Cycling and walking shall be encouraged within and through the Plan Lands by creating a connected network of safe and accessible pedestrian and cycle routes that serve all streets and spaces including existing streets. All neighbourhood blocks shall be afforded direct pedestrian and cyclist access to Main Link and Local Link Streets and direct or indirect routes to school and community facilities especially parks, open spaces, local shopping facilities and public transport. There shall be no barriers to pedestrian or cyclist movement between housing developments including between new and existing developments and no barriers shall be erected along streets with limited exceptions for garden boundaries.

Objective AM17: Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian and cycle access to community facilities, schools, open spaces, local shopping, or public transport stops for future and existing residents."

Table 5.2 of the BOLAP 2014, sets out the minimum public open space requirement,

Table 5.2: Minimum Public Open Space Requirement	
Character Area	Min. Open Space
Lower Slope Lands	20%
Mid Slope Lands	20%
Upper Slope Lands	30%

Figure 5.6: Minimum Open Space Requirement (source: Table 5.2 BOLAP 2014)



Figure 5.7: Landscape Masterplan, [Source MA, drawing no. 0100]

Response

As noted in Figure 5.5 the subject site is located within the lower sloped, mid sloped lands and upper sloped lands. The BOLP 2014 requires a minimum of 20-30% of the site to be provided as open space, i.e. c. 4,400- 6,600 sq.m.

Landscaped open space provision is c.44.7% (c.13,347sq.m) of the overall site area and is principally located centrally and at the northern boundary of the site. Additional open space is also provided throughout the development. The open spaces will incorporate paths, small trees, woodland boundary treatment, a level kickabout space and incidental play elements and lawns. This provision is in excess of the minimum open space requirement set out in the *BOLAP 2014*.

As noted in Section 5.3.4 of the Planning Report, prepared by TPA, 2 no. areas of proposed open space on the subject site overlap with the open space provision at White Pines North. As such, these areas have been discounted from the overall open space proposed at White Pines East. This has resulted in a revised Open Space provision of c. 11,392sq.m, representing an open space provision of c38% for White Pines East SHD.

As shown in Figure 5.7, the amenity spaces will incorporate paths, small trees, wildflower meadows, incidental play elements and lawns.

The proposed landscape design for the site, has been designed in tandem with the architectural design of the wider site, and as a result, the landscape components are

inherent to the architectural layout of the scheme. The development includes extensive areas of landscape architecture.

The proposed landscape layout has been designed to create a sense of place, supporting the urban design layout in the creation of streetscapes and residential spaces. The design strategy aims to promote sociability, providing places for social interaction and the creation of a sense of community. Furthermore, careful consideration has been had to ensure the layout of the public realm, ties into the existing linear park, to the north of the site.

For further information please refer to the Landscape Masterplan and Design Report, prepared by MA, submitted with this application.

5.3.8 Private Open Space

- **SDDP 2016-22**

Local Policy H13 Objective 1 & 2: Private Open Space states;

"Objective 1: To ensure that all private open spaces for apartments and duplexes including balconies, patios and roof gardens are designed in accordance with the qualitative and quantitative standards (including minimum balcony size and depth) set out under Sustainable Urban Housing: Design Standards for New Apartments, DECLG (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide, DEHLG (2009)."

"Objective 2: To ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of active and passive uses, in accordance with the quantitative standards set out in Chapter 11 Implementation."

- **BOLAP 2014**

As noted on page 53 of the BOLAP 2014;

All dwellings shall at least be provided with the minimum required quantum of private amenity space in accordance with the requirements of the South Dublin County Council Development Plan"

Response

Private open space is provided via balconies, terraces and garden space in compliance with minimum areas. Many balconies exceed the minimum areas required with private open space range in size from 4 sqm to 9 sqm.

A number of apartments will also benefit from its elevated location with views north towards the city. Please refer to Section 4.4 above for further information.

133 no. apartment/duplex units (c.55%) enjoy dual aspect due to their innovative layout. In addition, all units enjoy dedicated private open space in the form of balconies and terraces.

5.3.9 Car Parking

- **SDDP 2016-22**

The provision of car parking is guided by the following policies/objectives, set out in the *SDDP 2016-22*;

TM7 Car Parking: *It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation.*

TM7 Objective 1: *To carefully consider the number of parking spaces provided to service the needs of new development."*

TM7 Objective 2: *To effectively design and manage parking to ensure the efficient turnover of spaces."*

TM7 Objective 3: *To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape."*

TM2 Objective 3: *To generate additional demand for public transport services through integrated land use planning and maximising access to existing and planned public transport services throughout the network.*

Transport and Mobility (TM) Policy 3 Walking and Cycling: *It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.*

H8 Objective 1: *To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

Tables 11.23 and 11.24 of the *SDDP 2016-22* sets out standards for car parking. This sets out 1 no. car parking space per one-bedroom apartment and 1.25 No. car parking spaces per two-bedroom apartments. It is noted that the *Development Plan* standards are maximum standards.

Table 11.24: Maximum Parking Rates (Residential Development)

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1	ZONE 2
Apartment	1 Bed	1 space	0.75 space
	2 bed	1.25 space	1 space
	3 bed+	1.5 spaces	1.25 space
House	1 Bed	1 space	1 space
	2 Bed	1.5 space	1.25
	3+ bed	2 space	1.5

Figure 5.8: SDCC Parking Standards [source: *DSCC 2016-22*, Table 11.4.2 Parking Standards]

- **BOLAP 2014**

As noted in Appendix 1 of the *BOLAP 2014*;

“The quantum of car parking shall be provided in line with the standards set out under the South Dublin County Council Development Plan, 2010 – 2016 or any superseding County Development Plan.”

Response

In total 204 no. car parking spaces are proposed to serve the development. 194 no. car parking spaces are provided to serve the residential units. This provides for 0.81 car parking spaces per unit. 10 no. additional spaces are also proposed to serve the community building.

The quantum of parking fully complies with the standards set within the SDCC Development Plan.

5.3.10 Cycle parking

- **SDDP 2016-22**

Bicycle Parking Standards are set out in Table 11.22 of the *SDDP 2016-22*.

Table 11.22: Minimum Bicycle Parking Rates

CATEGORY	LAND USE	LONG TERM	SHORT STAY
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per 5 apartments	1 per 10 apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Civic, Community and Religious	Bank	1 per 5 staff	1 per 100 sqm GFA
	Community Centre Library		
	Public Institution		
	Place of Worship		1 per 10 seats

Figure 5.9: Non -Residential Cycle Parking Standards (Source, *SDDP 2016-22*)

- **BOLAP 2014**

The BOLAP, sets out the following Objectives, relating to the provision of bicycle parking;

“Objective AM9: *Cycling and walking shall be encouraged within and through the Plan Lands by creating a connected network of safe and accessible pedestrian and cycle routes that serve all streets and spaces including existing streets. All neighbourhood blocks shall be afforded direct pedestrian and cyclist access to Main Link and Local Link Streets and direct or indirect routes to school and community facilities especially parks, open spaces, local shopping facilities and public transport. There shall be no barriers to pedestrian or cyclist movement between housing developments including between new and existing developments and no barriers shall be erected along streets with limited exceptions for garden boundaries.”*

“Objective AM11: *All commercial, community and school development shall include for bicycle parking facilities designed in accordance with the recommendations set out in the National Cycle Manual (2011) and the Standards and Design Criteria section of this LAP.”*

Bicycle Parking Standards, are set out in Appendix 1 of the BOLAP 2014 as follows;

Bicycle Parking Standards

Development	Bicycle Parking
Residential Units	1 space per dwelling
Retail	1 space per 100 sq.m. gross floor area
Primary School and/or Post Primary School	1 space per 10 pupils
Neighbourhood Parks	1 space per 0.2 hectares
Crèches	1 space per 100 sq.m gross floor area
Community Centre	1 space per 30 sq.m gross floor area

Figure 5.10: Cycle Parking Standards [source: BOLAP 2014, Appendix 1]

Response

Bicycle Parking Standards are set out in Section 11.4.1 of the SDDP 2016-22. In total 401 no. cycle parking spaces will be provided throughout the development site.

Bicycle storage for the apartment units is provided within secure covered bicycle stores located throughout the site. In total 337 no. long stay secure cycle parking spaces will be provided to serve the residential units. 57 no. additional short stay spaces are also provided at throughout the development site, adjacent to the proposed community building, apartment entrances, and significant areas of open space. 7 no. additional cycle parking space will also be provided to serve the community building space.

This equates to c. 1.4 no. long stay bicycle parking space per residential unit, which is substantially higher than the 1 No. bike space per 5 apartments as required by the Development Plan.

Standard/Proposed	Type	Apts	Community Centre	Sub Total
SDCC Standards	Short	24	6	30
	Long	48	2	50
	Total	72	8	80
SUHDS Standards	Short	121	-	121
	Long	393	-	393
	Total	514	-	514
Proposed	Short	57	5	62
	Long	337	2	339
	Total	394	7	401

Figure 5.11: Cycle Parking Standard Assessment [source: DBFL Transport Assessment, Table 4.2]

5.3.11 Community Infrastructure

- **SDDP 2016-22**

Local Policy C1 relates to the provision of Community Facilities;

C1 Objective 1: To carry out an assessment of community floorspace needs in South Dublin County.

C1 Objective 2: To support the provision of a network of district scale community centres across the County that can function as multifunctional, active and vibrant community hubs.

C1 Objective 3: To support the clustering of community facilities such as community centres, sports and leisure facilities and open spaces to create multi-purpose community hubs.

C1 Objective 4: To ensure that community facilities are provided in new communities on a phased basis in tandem with the provision of housing in accordance with approved Local Area Plans or Planning Schemes.

C1 Objective 5: To support the provision of new or improved facilities in established areas.

C1 Objective 6: To ensure that community buildings are flexible and adaptable and can be used by all age cohorts, including young people (youth programmes, youth cafés, etc).

- **BOLAP 2014**

LUD8 of the BOLAP 2014 states the following relating to the provision of Community Space;

Objective LUD8: *All residential development shall provide community floorspace at a rate of 3 sq.m per 10 dwellings (excluding childcare floorspace). Such floorspace shall be grouped in community facilities and shall be located close to or within local shopping facilities/centres within the Plan Lands.*

Response

c.171sq.m of tenant amenity space is proposed to serve the development. This space will provide a reception and concierge service for residents, with on-site maintenance/repair. A gym, play area and residents lounge will also be provided.

It is also noted that a community building space c. 552sq.m is being proposed on the ground floor of Block A, to satisfy the phasing requirements of the BOLAP 2014, discussed in detail in Section 5.3.15 below. As noted below, the *BOLAP 2014*, Phase 2 requirements, seeks the provision of 190 sq.m community floorspace. However, following consultation with SDCC, it was clear that a 190 sq.m community centre space in this location would not be viable. As a result, the current application proposes the provision of 552 sq.m community centre space, to serve the local area.

A Community Facility Audit, Childcare Facility Audit and School Needs Assessment, prepared by TPA, are included with this application. These reports confirm there is sufficient capacity, in terms of community facilities, primary and secondary schools, and, childcare facilities, in the surrounding area to support the existing and proposed developments on Stocking Avenue.

5.3.12 Privacy and Security

Local Policy H15 Objective 1, 2 & 4, Privacy and Security, states;

H15 Objective 1: *To ensure that there is a clear definition between private, semi-private and public open space that serves residential development.*

H15 Objective 2: *To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and spaces*

H15 Objective 3: *To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.*

H15 Objective 4: *To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.*

Objective 5: *To investigate a protocol for the development of CCTV systems within housing areas where it is demonstrated that there is a clear security and safety need subject to the protection of residential amenities including the privacy of existing dwellings.*

Regarding privacy and overlooking, the *BOLAP 2014* states;

“Privacy and Overlooking Dwelling designs and layouts should seek to achieve reasonable privacy for living rooms, bedrooms and private amenity spaces in accordance with the requirements of the South Dublin County Council Development Plan.

Public streets and spaces including cul de sacs (where permitted) shall be fronted and overlooked by development in the interest of safety and security by way of promoting passive surveillance. Where parking is provided on-street and dwellings are located close to the street edge such as on the Lower Slope Lands, privacy strips that range from 1 to 3 metres in depth shall be provided to the front of dwellings. Larger front gardens with in-curtilage parking are encouraged elsewhere especially on the Upper Slope Lands.

Boundary treatments to front gardens and privacy strips should demarcate private space but allow for good levels of passive surveillance. This could include the use of low planting, walls or semi-transparent boundary treatments such as railings. Such boundary treatments should be no more than 1.2 metres in height and provide an individual entrance to each dwelling house.”

Response

The layout and block design of the scheme ensures that passive surveillance of public spaces is maximised. The internal road layout, pedestrian routes and streetscape will also serve to animate these spaces.

Adequate separation distances are provided between apartment blocks, and duplex units, with privacy strips providing additional screening for ground floor apartments. The proposed development has been designed to ensure it will not negatively impact the residential amenities of the existing dwellings at Whit Pines North, the Stocking Hill residential development, Green Acres House or emerging development in the area.

5.3.13 Energy/ Sustainability

- **SDDP 2016-22**

The SDDP 2016-22, provides the following policies and objectives relating to sustainable energy provision.

“ENERGY (E) Policy 2 South Dublin Spatial Energy Demand Analysis

It is the policy of the Council to implement the recommendations of the South Dublin Spatial Energy Demand Analysis (SEDA) in conjunction with all relevant stakeholders, promoting energy efficiency and renewable energy measures across the County.

E2 Objective 1: *To develop planning policies and objectives in relation to energy planning on a spatial understanding of the existing and future energy demands of the County.*

E2 Objective 2: *To seek to reduce reliance on fossil fuels in the County by reducing the energy demand of existing buildings, in particular residential dwellings.*

E2 Objective 3: *To promote the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the settlement hierarchy of the County and the built environment.*

E2 Objective 4: *To support the recording and monitoring of renewable energy potential in the County in partnership with other stakeholders including the Sustainable Energy Authority of Ireland (SEAI) and City of Dublin Energy Management Agency (CODEMA).*

E2 Objective 5: *To ensure that the recommendations of the South Dublin Spatial Energy Demand Analysis (SEDA) are carried out in accordance with environmental safeguards and the protection of natural or built heritage features, biodiversity and views and prospects.*

E2 Objective 6: *To require, where feasibly practical and viable, the provision of PV solar panels in new public buildings (e.g. Council buildings, school buildings, hospitals, health centres, community centres, sports facilities, libraries, Garda stations etc), for electricity generation/storage and/or water heating so as to reduce energy costs, minimise carbon emissions and reduce our dependence on imported fossil fuels.*

E2 Objective 7: *To require, where feasibly practical and viable, the provision of PV solar panels in new housing and apartment builds, for electricity generation/storage and/or water heating, so as to reduce the long term energy/heating costs of residents living in such dwellings, to minimise carbon emissions and to reduce Ireland's dependency on imported energy derived from fossil fuels.*

- **BOLAP 2014**

The BOLAP 2014, provides the following objectives relating to sustainable energy provision.

Objective BF14: *All development should comply with Quality Housing for Sustainable Communities (2007) and Sustainable Residential Development in Urban Areas (2009) with regards to sustainability, energy efficiency and orientation of development.*

Objective BF15: *New housing schemes should be designed in accordance with passive solar design principles as set out under the Urban Design Manual (2009) and the Standards Section of this LAP (Appendix 2). The orientation of dwellings and internal layouts should therefore be arranged to maximise solar gain but in a balanced manner that does not significantly impact on the topography of the Plan Lands, conflict with Sustainable Urban Drainage Systems or significantly impinge on the successful creation of streetscapes in terms of good street frontage and passive surveillance.*

Response

As noted in Section 9 of the Energy and Sustainability Report, prepared by OCSC, a holistic sustainable approach has been adopted by the design team for the proposed development at White Pines East SHD. Through detailed design, a number of sustainability and efficiency features have been considered throughout.

The proposed development will comply with Part L 2019 (NZEB). As part of the development's efforts to further reduce energy consumption, the project is targeting an A2/A3 BER (Building Energy Rating) throughout.

The optimised approach is based on the Energy Hierarchy Plan - Be Mean, Be Lean, Be Green, summarised as follows;

Be Mean

- The façade performance specification has been optimised to limit heat loss, improve air tightness and thermal transmittance and to maximise natural daylight.

Be Lean

- High efficiency central plant will be specified where applicable to take advantage of the optimised façade design measures that have been introduced.
- A low energy lighting design will be utilised to further reduce energy consumption and increase occupant thermal comfort.

Be Green

- Renewable energy technologies such as Combined Heat and Power (CHP), Air Source Heat Pumps, Solar PV and Variable Refrigerant Flow will be considered for implementation.

A number of sustainable design features have been considered within the design to achieve the sustainability targets of the proposed refurbishment. These include:

- The proximity of the development to public transportation networks;
- Water efficiency measures such as low consumption sanitary fittings; and
- Improved indoor environmental quality.

The above measures will ensure that the proposed development is designed in accordance with the Energy and Sustainability Policies, set out in the *SDDP 2016-22*.

For Further information please refer to the Energy and Sustainability Report, prepared by OCSC.

5.3.14 Drainage

- ***SDDP 2016-22***

The *SDDP 2016-22* sets out the following Policies and Objectives regarding site draining.

G5 Objective 1: *To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.*

Policy H16: Steep or Varying Topography Sites *It is the policy of the Council to ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.*

H16 Objective 1: *To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).*

H16 Objective 2: To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography.

Policy IE1: Water & Wastewater Policy 1: It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County.

IE1 Objective 1: To work in conjunction with Irish Water to protect, manage and optimise water supply and foul drainage networks in the County. IE1

Objective 2: To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region.

IE1 Objective 2: To work in conjunction with Irish Water to facilitate the timely delivery of ongoing upgrades and the expansion of water supply and wastewater services to meet the future needs of the County and the Region.

IE Policy 2: Surface Water & Groundwater: It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

IE2 Objective 1: To maintain, improve and enhance the environmental and ecological quality of our surface waters and groundwater by implementing the programme of measures set out in the Eastern River Basin District River Basin Management Plan.

IE2 Objective 4: To incorporate Sustainable Urban Drainage Systems (SUDS) as part of Local Area Plans, Planning Schemes, Framework Plans and Design Statements to address the potential for Sustainable Urban Drainage at a site and/or district scale, including the potential for wetland facilities.

IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.

- **BOLAP 2014**

The SDDP 2016-22 sets out the following Policies/Objectives regarding site drainage;

Objective BF15: New housing schemes should be designed in accordance with passive solar design principles as set out under the Urban Design Manual (2009) and the Standards Section of this LAP (Appendix 2). The orientation of dwellings and internal layouts should therefore be arranged to maximise solar gain but in a balanced manner that does not significantly impact on the topography of the Plan Lands, conflict with Sustainable Urban Drainage Systems or significantly impinge on the successful creation of streetscapes in terms of good street frontage and passive surveillance.

Objective GI1: Promote the sustainable collection and on-site retention of surface water for delayed discharge to the local surface water sewerage system and for use as an on-site

resource and means of creating a biodiversity network that will retain and develop existing flora and fauna.

Objective GI2: *Ensure that a linked SUDS network shall be implemented fully across the Plan Lands in accordance with the requirements of the Greater Dublin Strategic Drainage Study (2005). All proposed developments shall contribute to the achievement of this integrated network in order to reduce surface water run-off and to minimise the risk of flooding. This shall include for a series of attenuation areas (ponds, basins and reedbeds) set within parklands and wetland areas within linear green spaces. The size and depth of the proposed SUDS retention areas shall be designed in accordance with the policies of the Greater Dublin Drainage Study and the guidelines provided on the irishsuds.com website.*

Objective GI4: *Ensure that SUDS elements such as swales, ponds, basins and reedbeds and other major SUDS features are planted with suitable riparian vegetation and water tolerant planting that will clean and attenuate surface water flow.*

Objective GI5: *Ensure that all newly created swales utilised within the SUDS network shall be of an appropriate (shallow and wide) dimension to allow for ease of maintenance, including mowing, and in the interest of health and safety where practical.*

Objective GI6: *Ensure that all individual developments and associated infrastructure, including streets and spaces, shall incorporate on-site SUDS components such as those identified in the Standards Section (Appendix 2) of this Local Area Plan. Features such as porous paviers, green roofs, rainwater recycling systems and soakaways should be utilised to intercept surface water before reaching the overall SUDS network.*

Response

SuDS is proposed throughout the site by means of open green spaces and planted areas along the boundary and other hard surfaces.

As confirmed in the letter submitted with this application, acceptance of design feedback has been received from Irish Water (dated 5th February 2021) advises that;

“We have reviewed your proposal for the connection(s) at the Development. Based on the information provided, which included the documents outlined in Appendix A to this letter, Irish Water has no objection to your proposals.”.

[Please refer to Appendix 10.2 of the EIAR for Correspondence with Irish Water.]

The proposed surface water drainage network accords with SUDS principles. The surface water drain under Stocking Avenue outfalls to the surface water drainage network, constructed by Ardstone under SD14A/0222, which serves “White Pines North” and ultimately outfalls to an existing 600mm diameter surface water drain which crosses under the M50 motorway.

Please refer to DBFL’s Infrastructure Design Report, and Chapter 10 of the EIAR, prepared by DBFL, for full details of the proposed SUDS, including methodologies.

5.3.15 Local Area Plan: Phasing Strategy

The Phasing Strategy for the subject site, is set out in Section 6.3.1 of the *BOLAP 2014*. For the purpose of the Phasing Strategy, the Plan Lands are divided into the east and west using the Ballycullen Road as the point of division. The subject site is located in the eastern side of the Plan Lands.

The Phasing Strategy for the eastern side of the plan lands has been designed in 4 distinct phases. Each phase is set by the number of residential units provided. As detailed below, each phase requires the commencement/provision of local infrastructure.

The key outcomes for the eastern sides of the Plan Lands are detailed in section 6.3.1 of the LAP.

Phase One of the strategy for the eastern side Plan Lands includes:

- *260 dwellings;*
- *Knocklyon Park Extension to include link to existing parkland/playing pitches to the north-east, upgrade of roundabout junction to four arm junction and 1 x NEAP (see Appendix 2 of LAP)*
- *Construction of Stocking Wood Neighbourhood and Community Centre to include at least 190 sq. m of community floorspace;*
- *at least 270 sq. m of childcare floorspace; and*
- *convenience shopping (not exceeding 1,500 sq. m gross).*
- *Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.*

As shown in Table 5.1, the recently occupied White Pines North (175 no. units) and the recently completed White Pines South (106 no. units) generally achieves the total provision of dwellings required for Phase 1.

In addition to this, as noted in Section 3.2 of the Planning Statement submitted with this application, Ardstone Homes Ltd have recently commenced development on the White Pines Retail site. This site was granted planning permission in January 2020 (SDCC Ref. SD19A/0345) for the construction of a neighbourhood centre comprising a single storey convenience retail unit (c.1,688 sq.m. GFA) and a three storey creche building (c.591sq.m. GFA). The White Pines Retail site will be completed and ready for occupation in Q3 of 2021.

Phase Two of the strategy for the eastern side Plan Lands includes:

- *150 dwellings*
- *Completion of the Neighbourhood and Community Centre to include at least 190 sq.m of community floorspace in addition to the minimum quantum set out under Phase One (at least 460 sq.m community floorspace total) and upgrade of roundabout junction to four arm junction with crossing facilities*
- *Commencement of landscaping of Green Buffer with tracks and trails along southern boundary with mountains*
- *Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.*

Phase Three of the strategy for the eastern side Plan Lands includes:

- 150 dwellings
- Completion of landscaping of Green Buffer with tracks and trails along southern boundary with mountains
- Commencement of planning process for the provision of a school on the designated Primary School site on the eastern side of the Plan Lands OR on the designated Primary School and/or Post-Primary school site on the western side of the Plan Lands.
- Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.

Development	Residential Units Provided/Proposed	Assessment
LAP Phase 1 (260 Dwellings)		
White Pines North	175 no. 3-5 bed family homes	Phase 1 of the <i>BOLAP (2014)</i> requires the provision of 260 no residential units. As such, there are 85no. residential units remaining in Phase 1 as a result of White Pines North.
LAP Phase 2 (150 Dwellings)		
White Pines South	106 no. 3-5 bed family homes	The balance of Phase 1 (85 no. units) are achieved here. In addition, 21 no. units proposed at White Pines South are considered to be within Phase 2. As a result of the development at White Pines South, there are 129no. residential units (21-150) remaining in Phase 2 of the <i>BOLAP (2014)</i> .
White Pines Retail	A single storey convenience retail unit and a three storey creche building.	No residential units proposed`
LAP Phase 3 (150 Dwellings)		
White Pines East SHD	241 units in a mix of 1 and 2 bed apartments.	The balance of Phase 2 (129 no. units) are achieved at White Pines East SHD. In addition, 112 no. residential units are considered to be within Phase 3. There are 38 no. residential units (112-150) remaining in Phase 3 of the <i>BOLAP (2014)</i> , as a result of the proposed development at White Pines East SHD.

Table 5.1: White Pines Masterplan Development, BOLAP Phasing Overview

The White Pines East SHD comprises the provision of 241 no. residential units. It is considered that the no. of residential units proposed here generally achieves the quantum of housings set out under Phases Two and Three.

The proposed development at White Pines East SHD is therefore considered to be included in Phase 3 for the Eastern Lands. We have discussed the proposal's response to the above listed phasing requirements below.

5.4.1 Upgrade of Roundabout Junction to Four Arm Junction

Phase 1 requires, in part.

“upgrade of roundabout junction to four arm junction”.

This is further noted in the BOLAP (2014);

“As indicated on Fig 5.1, existing roundabout junctions along Stocking Avenue and Hunters Road shall be upgraded to signalised junctions that incorporate pedestrian and cyclist crossings. Some roundabouts may be upgraded to provide for improved pedestrian and cycle crossing movement. Upgraded junctions or roundabouts should be designed in accordance with the Design Manual for Urban Roads and Streets (2013).”

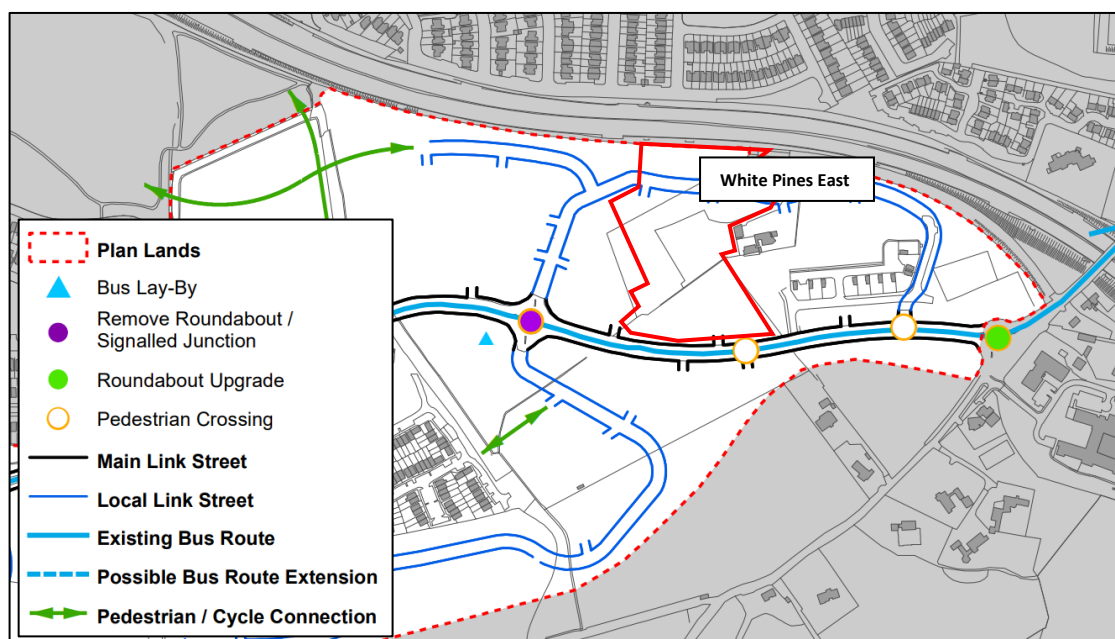


Figure 5.9: BOLAP (2014) Fig 5.1, existing roundabout junctions along Stocking Avenue.

As noted in Section 2.6.2 of the Transport Assessment prepared by DBFL;

“It is noted that the Stocking Avenue roundabout, located to the southwest of the site is indicated in the LAP to be removed or signalised. However, this roundabout was upgraded as part of the planning application SD14A/0222, to better reflect DMURS guidelines, providing a safer environment for pedestrians and cyclists while also reducing traffic speeds. Based on discussions with SDCC Roads Department throughout the pre-planning stages, it is understood that the roundabout would not be removed/signalised in the near future.”

It is further noted that SDCC Roads Department have not made any request for the upgrade of the roundabout junction to a four arm junction through pre-application Section 247 meetings with the Local Authority or pre-application tripartite consultation with ABP.

5.4.2 Completion of the Neighbourhood and Community Centre

Phase 2 for the eastern side Plan Lands requires;

“Completion of the Neighbourhood and Community Centre to include at least 190 sq.m of community floorspace in addition to the minimum quantum set out under

Phase One (at least 460 sq.m community floorspace total) and upgrade of roundabout junction to four arm junctions with crossing facilities”.

As noted above, construction is progressing on the White Pines Retail Site (SDCC Ref. SD19A/0345), to provide retail, community use and a creche space, in accordance with the phasing requirements of Phases One and Two for the Eastern Lands. As noted above, the White Pines Retail site will be completed and ready for occupation in Q3 of 2021.

As such and given the White Pines East SHD application is only at the planning stage, the new Neighbourhood Centre and Creche will be complete well in advance of the completion of the White Pines East SHD development, in accordance with the Phasing Requirement of the LAP.

As noted above, a 552 sqm Community Building is also proposed as part of the proposed application. The Community Building is proposed to serve the wider residential area. The building will provide an adaptable multi-function room, meeting room, administration space and ancillary spaces. This is provided in accordance with the with the Phasing Requirement of Phase 2 of *the BOLAP 2014*. . It should be noted that the Phase 2 requirement, seeks the provision of at least a 190 sq.m community floorspace. However, following consultation with SDCC, it was clear that a 190 sq.m community centre space in this location would not be viable. As a result, the current application proposes the provision of 552 sq.m community centre space, to serve the local area.

5.4.3 Green Buffer with tracks and trails along southern boundary with mountains

Phase 3 of the Eastern Lands requires the *‘completion of landscaping of Green Buffer with tracks and trails along southern boundary with mountains’*.

The proposed landscape design has been carefully selected to ensure the development at White Pines East SHD, provides connections to the west (White Pines North), south (White Pines South, White Pines Retail). As shown in the Landscape Masterplan, prepared by MA, see Figure 5.7, the development will provide a network of open spaces. This network has been specifically designed to ensure that the proposed open spaces provide meaningful linkages to adjoining sites.

These tracks and trails will also tie into the existing tracks and trails, provide at White Pines North and the Stocking Well North park and Playground further west. The current and proposed landscape layout provide a coherent landscape design providing pedestrian links to existing parks, playgrounds and the emerging White Pines Retail, for the wider White Pines Masterplan site.

It is further noted that the lands to the east, at Green Acre House, are zoned for new residential, the proposed landscaping plan has therefore been specifically designed to facilitate further pedestrian connections to the east.

While it is noted that the proposed landscape design provides for extensive pedestrian routes through the site, providing enhanced pedestrian links from Stocking Avenue through the White Pines East site, to the linear park on the northern boundary of the site, it is considered that this does not satisfy the Phasing Requirement of the BOLAP requiring the *‘completion of landscaping of Green Buffer with tracks and trails along southern boundary with mountains’*. As such, a material contravention has been identified. This is addressed in detail in Section 5.4.3 of the Material Contravention Statement, prepared by TPA.

5.4.4 Provision of a School on the Designated Primary School Site

Phase 3 of the Eastern Lands requires the;

“Commencement of planning process for the provision of a school on the designated Primary School site on the eastern side of the Plan Lands OR on the designated Primary School and/or Post-Primary school site on the western side of the Plan Lands. “

Planning permission was sought in June 2018 (SDCC Reg. Ref. SD18A/0204/ ABP Ref. ABP-302414-18) for the provision of a mixed-use development on 2 no. sites located along Stocking Avenue. One of the development sites comprised the eastern designated School Site, identified in Figure 5.12 below. The proposed development comprised, in part, the construction of an educational campus (comprising a two storey 16 classroom primary school (2,407sq.m); a two storey 37 classroom post primary school (10,095sq.m) and playing pitch (c. 2.67 ha).

Planning permission was refused by ABP in February 2019, as the proposed development was not considered to be in accordance with the SDCC 2016-22 and BOLAP 2014.

Permission was refused, in part, because the development proposed to relocate the school to a neighbouring site and construct a residential development on the designated site, in tandem with the relocated school complex.



Figure 5.12: BOLAP 2014, indicative Layout Plan, SDCC Ref. SD17A/0443

While it is acknowledged that planning permission was refused, it is considered that the submission of the planning application on the school site, achieves the phasing requirement set out in Phase 3 of the Eastern Plan Lands, requiring the ‘*commencement of planning process for the provision of a school*’.

Response

It is therefore concluded for the reasons outlined above, that the proposed development is broadly consistent with the phasing requirement for each of the 3no. phases outlined in the LAP.

6.0 CONCLUSION

This Statement of Consistency demonstrates the compliance of the proposed development with the relevant National, Regional and Local Planning Policy context. The proposed development is consistent with National Policy and is generally consistent with the policies and objectives contained within the County Development Plan and Local Area Plan.

The proposed development will result in a very attractive place to live in Dublin City suburbs situated on zoned serviced lands, in close proximity to public transport links and local services.

Compliance is also demonstrated with the policies and provisions of the *South Dublin County Development Plan 2016-2022* and *Ballycullen-Oldcourt Local Area Plan 2014*, which are the key planning policy document at a local level.

At a National and Regional level, this statement has demonstrated the compliance of with National and Regional policy and government planning guidelines.

It is submitted that the proposed development will provide an appropriate form of high-quality residential development for this substantial residential zoned site providing for an efficient use of lands which are highly accessible and well served by public transport.

The design and layout of the proposed development has been prepared following pre-application consultations with the South Dublin County Council under Section 247 of the Planning and Development Act 2000.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant National, Regional and Local planning policies and guidelines.

Yours faithfully



Gavin Lawlor
Director
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