

Planning Report
& Statement of
Consistency

Kishoge Part 10

May 2025

For South Dublin
County Council

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1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361, are instructed by our Client (the Applicant), South Dublin County Council, County Hall Tallaght, Dublin 24, D24 A3XC, to prepare this Planning Application Report and Statement of Consistency to accompany a Part X Planning Application to An Bord Pleanála.

This Planning Application Report sets out how, in our opinion, the proposed development complies with the proper planning and sustainable development of this area, in the context of the relevant strategic local, regional and national planning policy, as expressed primarily in the *Clonburris Strategic Development Zone Planning Scheme 2019* ("the Planning Scheme") and the *South Dublin County Development Plan 2022 – 2028* ("the Development Plan").

2 PART X APPLICATION TO AN BORD PLEANALA

2.1 Local Authority Development

The Part X Planning Application seeks approval for residentially-led development by South Dublin County Council, that requires Environmental Impact Assessment.

The proposed development broadly comprises the development of 1,252no. dwellings, in a mix of houses, duplexes, triplexes and apartments; 2no. childcare facilities; 1no. community building; 1no. retail unit; refurbishment of existing Grange House for future employment reuse, and all associated site development works, landscape and boundary treatments.

For a more comprehensive description of development please refer to Section 17 of this report, and to the plans and particulars that accompany this planning application.

2.2 The Application Site

The proposed development is located within the 'Kishoge Development Area' of the Clonburris SDZ Planning Scheme, within the townlands of Kishoge, Esker South, Grange, and Balgaddy, Clonburris, County Dublin.

More specifically, the proposed development is accommodated at lands cumulatively amounting to c. 29.39 ha, within three identifiable sites, within the Kishoge Development Area, as follows:

Site 3:

Located within 'Development Area 7- Kishoge North West' (including all or part of Sub Sectors KNW-S1, KNW-S2 and KNW-S3) and 'Development Area 6- Kishoge Urban Centre' (including part of Sub-Sector KUC-S1).

Site 3 is bounded generally by Lucan East Educate Together National School and Oldbridge housing estate to the north; Tullyhall residential housing estate to the west; Adamstown Avenue and Kishoge train station and Dublin-Cork rail line to the south; and, Grange Castle Road (R136) to the east.

Site 4:

Located within 'Development Area 8- Kishoge South West' (including all or part of Sub Sectors KSW-S1 and KSW-S2)

Site 4 is bounded to the north by the Dublin-Cork rail line, to the west by Griffeen Valley Park extension, by a permitted linear park (SD228/0003) to the east and the Grand Canal corridor to the south.

Site 5:

Located within 'Development Area 10 - Kishoge North East' (including all or part of Sub Sectors KNE-S1 and KNE-S2) and 'Development Area 6 - Kishoge Urban Centre' (including all or part of Sub-Sector KUC-S2).

2.3 Environmental Impact Assessment

The proposed local authority development exceeds 500no. dwellings and a cumulative site area greater than 10ha. It is above the threshold for mandatory Environmental Impact Assessment (EIA).

An EIAR accompanies this Part X application to An Bord Pleanála.

2.4 The Applicant

The Applicant in this case is South Dublin County Council, details as follows: -

Name: South Dublin County Council

Address: County Hall Tallaght, Dublin 24, D24 A3XC

2.5 LANDOWNERSHIP

The Applicant is in ownership of the majority of the lands subject of this Application.

We note, however, that there are lands outside of the Applicant's ownership, a Letter of Consent is provided for each of these landholdings as detailed below: -

- Lands to the south of Site 5a within the ownership of Córas Iompair Éireann
- Lands to the south of Site 4 within the ownership of Grange Castle Homes

3 PART X PLANNING LEGISLATION

Approval is sought from An Bord Pleanála for local authority development requiring EIA.

This Application and accompanying Environmental Impact Assessment Report (EIAR) is being made to An Bord Pleanála, on behalf of South Dublin County Council, under the provisions of Part X, Section 175 of the Planning and Development Act 2000, as amended ("the Act").

Section 175 of the Act confirms, *inter alia*, that: -

175.—(1) Where development belonging to a class of development, identified for the purposes of section 176, is proposed to be carried out—

(a) by a local authority that is a planning authority, whether in its capacity as a planning authority or in any other capacity, or

(b) by some other person on behalf of, or jointly or in partnership with, such a local authority, pursuant to a contract entered into by that local authority whether in its capacity as a planning authority or in any other capacity,

within the functional area of the local authority concerned (hereafter in this section referred to as "proposed development"), the local authority shall prepare, or cause to be prepared, an environmental impact assessment report in respect thereof.

(2) Proposed development in respect of which an environmental impact assessment report has been prepared in accordance with subsection (1) shall not be carried out unless the Board has approved it with or without modifications.

(3) Subject to subsection (3A)¹, where an environmental impact assessment report has been prepared in accordance with subsection (1), the local authority shall apply to the Board for approval of the proposed development to which the report relates.

...

¹ Section 3A relates to proposed development in the maritime area. It is not relevant to the project at hand.

(4) Before a local authority makes an application for approval under subsection (3), it shall—

(a) publish in one or more newspapers circulating in the area in which it is proposed to carry out the development **a notice** indicating the nature and location of the proposed development and—

(i) stating that—

(I) it proposes to seek the **approval of the Board** for the proposed development,

(II) an **environmental impact assessment report** has been prepared in respect of the proposed development,

(III) it is notifying a Member State of the European Communities or any other party to the Transboundary Convention of its opinion that the proposed development to which the application for approval to An Bord Pleanála relates would be likely to have significant effects on the environment in that State,

(IV) the **Board may give approval to the application for development with or without conditions or may refuse the application for development.**

(ii) specifying the times and places at which, and the period (**not being less than 6 weeks**) during which, a copy of the **environmental impact assessment report may be inspected** free of charge or purchased, and

(iii) inviting the making, during such period, of **submissions and observations** to the Board relating to—

(I) the implications of the proposed development for proper planning and sustainable development in the area concerned, and

(II) the likely effects on the environment of the proposed development,

if carried out,

(iv) stating that a person may question the validity of a decision of the Board by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts ([S.I. No. 15 of 1986](#))

(v) stating where practical information on the review mechanism can be found.

and

(b) send a copy of the application and the environmental impact assessment report to the **prescribed authorities** together with a notice stating that submissions or observations may, during the period referred to in paragraph (a)(ii), be made in writing to the Board in relation to—

(i) the likely effects on the environment of the proposed development, and

(ii) the implications of the proposed development for proper planning and sustainable development in the area concerned,

if carried out.

...

(9A)(a) The Board shall direct the payment of such sum as it considers reasonable by the local authority concerned to the Board towards the costs and expenses incurred by the Board in determining an application under this section for approval of a proposed development,

3.1 Statutory Notice and Accompanying Documents

Part 8 of the Planning and Development Regulations 2001 (as amended) (“the Regulations”) refers to requirements in respect of specified development by local authorities (not requiring EIAR).

For Part 8 consent, Article 81(1) requires that the planning authority gives notice of the proposed development (a) in an approved newspaper and (b) in the form of a site notice or notices on the land which the proposed development would be situated. While it is noted that Part X of the Act requires that a newspaper notice be published for local authority development requiring EIAR, it does not specify that a site notice is required.

As Part X requires that the EIAR is made available for inspection for a minimum period of 6 weeks, we have referred to Article 83(1) of the Regulations for further guidance on the scope of the plans and particulars describing the proposed development that would be reasonable to make available for public inspection, during this same period (i.e. min. 6 weeks).

Article 83(1) identifies for the purposes of Part 8 (i.e. local authority development not requiring EIAR), that: -

- (a) *a document describing the nature and extent of the proposed development and the principal features thereof, including-*
 - (i) *where the proposed development would consist of or comprise the provision of houses, the **number of houses** to be provided,*
 - (ii) *where proposed development would relate to a protected structure or a proposed protected structure, an indication of that fact,*
 - (iii) *where the proposed development would comprise or be for the purposes of an activity requiring an integrated pollution control licence or a waste licence, an indication of that fact*
- (b) *a **location map**, drawn to a scale of not less than 1:1000 in built up areas and 1:2500 in all other areas (which shall be identified thereon) and marked or coloured so as to identify clearly the land on which it is proposed to carry out the proposed development,*
- (c) ...
 - (i) *a **site layout plan**, drawn to a scale of not less than 1:500, showing the boundary of the site on which it is proposed to carry out the proposed development and the buildings or other structures, and roads or other features, in the vicinity of the site, and*
 - (ii) *such **other plans and drawings**, drawn to a scale of not less than 1:100, as are necessary to describe the proposed development,*

We refer the Board, therefore, to the following documents which accompany this Part X application: -

1. Site Notice (copy) erected at multiple locations on the application land
2. Newspaper Notice
3. Site Location Map, 1:1000
4. Site Layout Plan, 1:500

The proposed development is also illustrated and described by the other plans and particulars that accompany this Part 10 planning application. We refer the Board to the enclosed Cover Letter which provides a full list of enclosures.

3.2 Planning Fee

A fee of €30,000.00 has been paid to An Bord Pleanála via Electronic Fund Transfer for the making of this planning application. Proof of payment is enclosed with this application.

3.3 Prescribed Bodies

In accordance with Section 175 (4)(b) of the Planning and Development Act 2000, as amended, we enclose herewith as part of this Planning Application, a copy of the Cover Letters to the relevant Prescribed Bodies in this case, being: -

- An Chomhairle Ealaíon
- An Taisce
- Córas Iompair Éireann
- Department of Housing, Local Government & Heritage
- Fáilte Ireland
- Heritage Council
- Iarnród Éireann
- Inland Fisheries Ireland
- Irish Aviation Authority
- National Transport Authority
- The Commission for Railway Regulation
- Transport Infrastructure Ireland
- Waterways Ireland

3.4 Planning Application Website

A website has been set up to enable third-parties to view and download the application documents and associated Environmental Impact Assessment Report: www.kishoge-part10.com.

4 PRE-PLANNING CONSULTATION

4.1 Site 3

A preliminary pre-planning consultation with South Dublin County Council, as the local planning authority, was held on 26 June 2024 and was attended by the following Planning Authority officials: -

- Caitlin O'Shea, Acting Senior Executive Planner, Development Management
- Gormla O'Corrain, Senior Planner, Development Management
- Colin Clarke, Senior Executive Planner, Planning Delivery
- Fiona Redmond, Executive Planner, Planning Delivery
- Pádraig Collins, Executive Planner, Forward Planning
- Jack Madden, Assistant Planner, Development Management
- Graham Egan, Planning Summer Student, Planning Delivery
- Mayuri Srinivasan, Graduate Project Manager, Planning Delivery
- Brian Harkin, Senior Executive Engineer, Drainage
- Nicky Cox, Assistant Engineer, Roads
- Laurence Collieran, SDCC Senior Executive Parks Superintendent
- Debbie O'Dempsey, Housing

The outline details of the proposed development were presented to the Planning Authority, identifying key issues of relevance to the site layout and emerging design at that time, as follows:

- A 70 Bar Gas Network Ireland Main runs North to South, located East of the R136 road. This infrastructure is not addressed within the approved SDZ Planning Scheme. However, it requires a 16m utility service zone and has potential additional construction constraints (Site 3).
- The ESB 38kv Balgaddy Station is a regional 38kv station. This infrastructure is not addressed within the approved SDZ Planning Scheme. However, the application team has been advised by the ESB that the station will not be relocated during the development of this current application.
- 220kv ESB overhead power cables run along the north boundary of Site 4 and are routed diagonally across Site 3 to Site 5 via the 38kV Balgaddy Station. These are intended to be partially removed and undergrounded to Sites 4 and 3 in advance of development commencement. A number of 38kv overhead cables and 10kv underground run through the sites, these are also either scheduled to be undergrounded, or will have to be diverted as part of new construction works.
- A highspeed Rail Network Corridor traverses the subject areas. Site 3 benefits from level access to this service at Kishoge Station. It is likely that sound mitigation measures will be required along this boundary in the form of planting and constructed barriers (Sites 3, 4).
- Road Infrastructure and Levels: the introduction of the approved South Link Street, and the potential approval of the proposed North Link Street will impact the site development. The sites topography generally requires coordination of all new and existing roads for tie-in points.

The Planning Authority's feedback is summarised below: -

Planning Department

ESB Infrastructure

- SDCC Planning Department accept that the ESB 38kv Balgaddy Station cannot be relocated in the short to medium term.
- Applicant to consider visual impact and interfaces of houses in the context of infrastructure remaining on site.
- Applicant to demonstrate how fixed building lines/centre lines are achieved in the context of strategic infrastructure remaining on site.

Sub-Sectors

- Applicant to identify the Planning Scheme sub-sectors and their extent within and outside of the application boundary.
- To demonstrate that Site 3 development will not prejudice the delivery of the secondary school to the north of the site.
- Clarity sought in respect of the interface between the proposed development and existing residential estates to the north and west of Site 3.

Roads Department

Road Hierarchy

- Compliance with the Clonburris SDZ Planning Scheme Roads Hierarchy to be clarified.
- Ensure that car parking rates are adhered to.
- A Construction Traffic Management Plan to be provided.

Drainage Department

Water and Drainage

- Details of pre-development and post-development flood routes to be provided.

Parks Department

Green Infrastructure

- Due to site constraints posed by existing regional ESB Substation and gas mains, the alternative green link proposal within Site 3 was agreed in principle.
- Green infrastructure proposals generally satisfactory.

A follow up consultation was held on 27 February 2025, in respect of the consistency of the Site 3 proposed development with the Planning Scheme. This meeting was attended by the following South Dublin County Council Planning Department officials: -

- Gormla O’Corrain – Senior Planner SDCC
- Caitlin O’Shea – Senior Executive Planner for North Teams (SDZ)

The Planning Department’s feedback is summarised below: -

- Minor deviations to the SDZ Frameworks have been allowed to fixed street, centreline and junction details in other SDZ cases (e.g. SDZ24A/0033W), due to site specific constraints (e.g. immovable strategic regional infrastructure) beyond the control of the developer.
- 10% density transfer has been utilised in past applications. Density from third-party lands is acceptable in principle, however, the Design Team will need to demonstrate that it does not prejudice other developments.
- Further details to demonstrate road levels, such as massing studies or cross sections to ensure that there is not an undesired visual impact.
- It is the planning authority’s interpretation that the + or – 5 dwellings per hectare density flexibility is already applied within the minimum-maximum density range identified for each subsector. The planning authority referred to the example of SDZ22A/0010 at Clonburris South East and Clonburris Urban Centre as a relevant precedent in this respect. Clarification regarding calculation of net developable area and submission of indicative masterplans and schedules were identified by the planning authority as appropriate tools for demonstrating how transfer of dwellings to adjacent subsectors can achieve the subsector parameters. Where necessary conditions of permission may be applied to achieve consistency.
- Further consideration of urban grain details recommended. The planning authority referred to the example of SDZ23A/0043 at Kishoge South East and Kishoge Urban Centre as a relevant example of the detail recommended.

4.2 Site 4

A preliminary pre-planning consultation was held on 02 July 2024 and was attended by the following Planning Authority officials: -

- Caitlin O’Shea, Acting Senior Executive Planner, Development Management
- Gormla O’Corrain, Senior Planner, Development Management
- Padraig Collins, Executive Planner, Forward Planning
- Brian Harkin, Senior Executive Engineer, Drainage
- Nicky Cox, Assistant Engineer, Roads

The outline details of the proposed development were presented to the Planning Authority, identifying key issues of relevance to the site layout and emerging design at that time, as follows:

- Site constraints include the rail line to the north, Griffeen Valley Park to the west, permitted Linear Park to the east, the Grand Canal corridor to the south, and some minor ditches and water course diversions on site.

- ESB 220kv overhead cable present on site.
- Strategic South Link Street (approved under SDZ20A/0021) dictates primary frontage, with approved junctions (pedestrian and cycle only), for Site 4 development.

The Planning Authority's feedback is summarised below: -

Planning Department

Residential Development

- Net area and density is to be in accordance with Figure 6.12 of the Planning Scheme.
- Diagram to demonstrate the redline boundary in the context of the Planning Scheme subsector map.
- Demonstrate how fine urban grain is achieved at Site 4.

Non-Residential Uses

- Demonstrate how the local node is being delivered between Site 4 and Griffeen Park.
- Justify proposal to locate c.600 sqm community floor area in Griffeen Valley Park, as a deviation from the detail of the Planning Scheme diagram
- Clarify whether creche use satisfies the employment floor area requirement for Kishoge South West.

Roads Department

- No significant departures from the Planning Scheme apparent.
- Applicant to demonstrate compliance with street hierarchy design of the Planning Scheme.
- Vehicle tracking drawings recommended for bin collection points
- Construction Traffic Management Plan to be submitted with the Application.
- Public Lighting to be agreed with the Council's Public Lighting Department

Drainage Department

- Flood Risk Assessment required to demonstrate mitigation of flooding on and off site.
- Seek to avoid building over or culverting existing water courses.
- 10m setback from existing streams required.
- 30-50m set back from Grand Canal ecological corridor required.
- Maximise SUDS and minimise pipes. Calculations for Surface Water attenuation to be submitted with the planning application

A follow up consultation was held on 27 February 2025, in respect of the consistency of the Site 4 proposed development with the Planning Scheme. This meeting was attended by the following South Dublin County Council Planning Department officials: -

- Gormla O'Corrain – Senior Planner SDCC
- Caitlin O'Shea – Senior Executive Planner for North Teams (SDZ)

The Planning Department's feedback is summarised below: -

- Demonstrate that a set back of 30-50m from the Grand Canal achieved.
- It is the planning authority's interpretation that the + or – 5 dwellings per hectare density flexibility is already applied within the minimum-maximum density range identified for each subsector. The planning authority referred to the example of SDZ22A/0010 at Clonburris South East and Clonburris Urban Centre as a relevant precedent in this respect. Clarification regarding calculation of net

developable area and submission of indicative masterplans and schedules were identified by the planning authority as appropriate tools for demonstrating how transfer of dwellings to adjacent subsectors can achieve the subsector parameters. Where necessary conditions of permission may be applied to achieve consistency.

- Further consideration of urban grain details recommended. The planning authority referred to the example of SDZ23A/0043 at Kishoge South East and Kishoge Urban Centre as a relevant example of the detail recommended.

4.3 Site 5

A pre-planning consultation meeting with South Dublin County Council was held on 18 June 2024. The meeting was attended by members of the Site 5 Design Team and representatives of the Council's Planning, Architects, Housing, Roads, and Parks Departments.

The Design Team presented details of the proposal to the Planning Authority, identifying key issues of relevance to the site layout and emerging design, as follows:

- 30-metre utility service zone for ESB overhead power cables running across the northern section of Site 5A and Site 5B.
- Existing ESB compound located to the north-west of Site 5A.
- Provision for a future block along the northern section of Site 5A once the overhead powerlines have been decommissioned, as envisaged in the Planning Scheme.
- Integration with the elevated levels of the R136.
- Removal of the existing sound barrier along Thomas Omer Way to facilitate a strong building line/active frontage and improved setting.
- Relocation of the proposed vehicular entrance to Site 5B along TOW as per feedback from the SDCC Roads & Traffic Department.
- The size of the central park (public open space) in Site 5A, the discrepancy between masterplan layout and written text in the Planning Scheme.
- The scheme comprises residential units only. The Site 5B lands, lie within part of Kishoge Urban Centre (i.e. subsector KUC-S2) designated for mixed-use (KUC-S2), but do not include any proposed non-residential uses.
- There is a shortfall in density at Site 5B, within sub-sector KUC-S2, being below the density margins in the Planning Scheme.
- The eastern part of Site 5B, sitting outside of the SDZ boundary, is subject to the density standards of the County Development Plan and national guidelines rather than the Planning Scheme.

The Planning Authority's feedback is summarised below.

Planning Department

- The application documents should demonstrate that the retail/ employment floor space requirements in the Planning Scheme (applicable to subsector KUC-S2), can be achieved on the balance of the lands within the urban centre beyond Site 5.
- Submit layout analysis of the sub-sectors, where appropriate, to demonstrate that the relevant Planning Scheme parameters can be met in the round.
- In relation to building heights, compliance is required with the relevant tables in Section 3 of the Planning Scheme, which set out building height thresholds for the individual sub-sectors. The written text in these tables takes precedence where a discrepancy with the Building Height Strategy map arises.

- If the scheme triggers a likely future reliance on the transfer of residential units (up to 10%) to Site 5B (KNE-S2), ideally it should be taken from an adjoining 'residential' sub-sector rather than the urban centre.
- A master-planning exercise should be carried out to clarify how the development targets and built form parameters in the Planning Scheme can be achieved in the context of the site and adjoining SDZ lands.

Roads Department

- Thomas Omer Way is an arterial link road (60kph) with no residential development along it. Housing fronting Thomas Omer Way is encouraged to improve the 'feel' of the street and help reduce vehicle speeds.
- The scheme should tie in with the school drops off and pedestrians crossing.
- Proposed roads and access arrangements within the scheme should align with any roads proposals for the wider lands, including the Northern Link Street.
- Provide details of proposed car parking strategy and parking ratios.
- Provide road and path cross sections.
- The scheme shall be designed to comply with DMURS and Taking in Charge standards.

Parks & Public Realm

- Green infrastructure links should be applied in the design of roadways/ paths, e.g. SuDS measures, trees, planting and grass-crete parking.
- The link from the school to the north of the site is a primary connection and needs to be developed further.
- Landscaping proposal should be further developed in the vicinity of the ESB compound and SuDS measures introduced.
- Where possible, retain existing trees throughout the site and provide details regarding the extent of removal.

4.4 Pre-Planning Consultation Round Up

All the matters discussed during pre-planning consultation were taken on board by the Design Team in the design development phase. In addition, specialist design team members consulted with representatives of the Council's works departments to address relevant technical matters.

We refer the Board also to the letter dated 15 April 2025 from Eoin Burke, Director of Land Use Planning and Transportation Department, SDCC, which expresses support for the proposed development at Sites 3, 4 & 5 within the Clonburris SDZ. This letter is enclosed with the application.

5 EXECUTIVE SUMMARY

5.1 Site and Context

Clonburris is a Strategic Development Zone, consisting of approximately 280 ha of greenfield land. It is in a prime location for urban expansion, located to the west of Dublin City Centre and the M50 within the triangle between Lucan, Clondalkin and Liffey Valley. Clonburris is a logical area to continue the expansion of the Dublin Area. Clonburris is bisected from east to west by the Grand Canal and the Dublin-Kildare / Cork railway line and by two strategic roads – Grange Castle Road in the centre of the site and the Fonthill Road to the East. Newcastle / Lock Road (R120) forms part of the land's western boundary. Grange Castle Business Park is located just to the south of the Grand Canal and Adamstown SDZ is located to the north-west boundary of Clonburris on the opposite side of the railway line in that location.

The overall Clonburris SDZ Planning Scheme lands extend to a gross development area of approximately 280 ha, with a net development area of c.151 ha. The approved SDZ Planning Scheme has development potential for c.9,500 dwellings. SDCC ownership extends to 39.5 ha of the Planning Scheme lands. They have been subject of a Masterplan study for approximately 2,600 dwellings.

The primary landowners within the Clonburris SDZ are currently progressing the approval and delivery of the necessary shared infrastructure to enable the overall delivery of the SDZ Planning Scheme.

The application site comprises three land parcels, "Site 3", "Site 4" and "Site 5". All are located within the adopted Clonburris SDZ Planning Scheme development boundary (with the exception of a portion of Site 5b), and all are in South Dublin County Council ownership.



Figure 1: Aerial View of Sites 3, 4 and 5. Approximate red line boundary in red (SLA overlay). Source: Google Maps.

5.2 Statutory Planning Consents – Summary

Table 1 below sets out the relevant planning consents in relation to development within the Clonburris Strategic Development Zoned lands.

Reg. Ref.	Applicant	Description	Date of Grant	Status	No. Dwellings	Non-Resi (sqm)
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SD179A24/0004	SDCC	118no. dwellings located off Lynch's Lane to the east of the R136 Outer Ring Road and south of Thomas Omer Way, in the townland of Kishoge, Lucan, Co. Dublin. According to the SDCC Planning Portal, a decision is yet to be made.	Granted Nov-24	Granted permission	118no. homes	N/A
SDZ24A/0032W	Department of Education	The retention and completion of revisions to a section of the northern site boundary comprising the omission of the pedestrian/cycle access off Thomas Omer Way	Granted 11-Mar-2025		N/A	N/A
SDZ24A/0033W	Clonburris Infrastructure Limited	Stage 2 Roads- The construction of c. 2.3km of a new Link Street Clonburris Northern Link Street (CNLS) and approximately 800m of side streets. Provision/upgrade of 12 signalised junctions. Approximately 2 km of upgrade of existing streets. Provision of 2 main public parks centrally and drainage infrastructure works .	Granted 10-Feb-2025	Granted	N/A	N/A
SDZ23A/0043	Cairn Homes Properties Limited	Kishoge Urban Centre- construction of a mixed-use development arranged in 11 no. blocks, ranging between 3 & 7 storeys, comprising: 495 no. dwellings, including 449 no. apartments	17-Apr-2024	Grant Permission	495	2,502 sq.m of retail floorspace 483 sq.m creche
SDZ23A/0018	Cairn Homes Properties Limited	Clonburris SW- construction of 565no. dwellings (mixture of apartments, duplex apartments and houses	11-Dec-23	Granted Permission	565	N/A
SDZ23A/0004	Clear Real Estate	Adamstown Extension- 385no. dwellings (139 houses, 70 Build-to-Rent duplex /	15-Dec-23	Granted Permission	385	N/A

	Holdings Limited	apartments, 72 duplex / apartments and 104 apartments), ranging between two to six storeys in height. This permission was amended under SDZ24A/0018W.				
SDZ22A/0018	Cairn Homes Properties Ltd.	Clonburris UC & SW- mixed-use development comprising 594no. apartments, office floorspace, 4 retail units, a creche and urban square. This permission was amended under SDZ24A/0019W.	31-Oct-23	Granted Permission	594	creche c. 609sq. m office use c. 4,516sq.m Block B retail: 1 unit (c.147.5sq. m) Block E retail: 3 units (c.106.2sq.m, c.141.6sq.m and c.492.2sq.m)
SDZ22A/0017	Cairn Homes Properties Ltd.	Clonburris SW- Construction of 157no. dwellings	16-May-23	Granted Permission	157	N/A
SDZ22A/0011	Department of Education	Proposed 2-storey primary school comprising 16 no. classrooms with an additional 2 classroom Special Educational Needs Unit	16-Feb-23	Granted Permission	N/A	Primary School (3,355sqm)
SDZ22A/0010	Kelland Homes Ltd.	Clonburris UC & SE- construction of 294 no. dwellings , creche and retail / commercial unit. This permission was amended under SDZ24A/0030W .	02-May-23	Commenced August 2023	294	1 no. 2 storey creche (c.520.2m2) 1 no. 2 storey retail /commercial unit (c.152.1m2)
SDZ28/0003	SDCC	Kishogue SW- 263no. dwellings	11-Jul-22	Part 8 Approved by SDCC	263	N/A
SDZ28/0001	SDCC	Canal Extension- 118no. dwellings made up of houses, duplexes, triplexes, an apartment building	13-Jun-21	Part 8 Approved by SDCC	118	N/A
SDZ21A/0022	Cairn Homes Properties Ltd.	Clonburris SW- 569no. dwellings , a creche, innovation hub and open space. This permission was amended under SDZ23A/0029 resulting	23-Aug-22	Commenced Jan-2023	569	innovation hub (626sq.m) creche (c. 547sq.m)

		in 2no. additional units. This permission was amended again under SDZ24A/0028W.				
SDZ21A/0013	Department of Education	Kishoge Cross- A 3 storey, 1,000 pupil post primary school including a 4 classroom Special Educational Needs Unit with a gross floor area of 11,443sq.m including sports hall	21-Feb-22	Granted Permission	N/A	Post Primary School
SDZ20A/0021	Clonburris Infrastructure Ltd	Southern Link Street- construction of c. 4.0km of a new road, known as Clonburris Southern Link Street	12-Aug-21	10 year permission	N/A	Roads & Drainage Infrastructure

Table 1: Overview of Relevant Planning History.

5.3 Clonburris SDZ Compliance- Summary

The combined proposed development of Sites 3, 4 & 5 in Kishoge Development Area allow the coherent delivery of a substantial number of homes within the SDZ in a manner that makes best use of the permitted link roads.

The proposed development complies in full with the Clonburris SDZ Planning Scheme. We refer the Board to Sections 11 to 14 inclusive of this Report which provide a full Statement of Consistency with the SDZ Planning Scheme.

5.4 South Dublin County Development Plan 2022-2028 Compliance – Summary

The South Dublin County Development Plan 2022-2028, which came into effect in August 2022, is the statutory plan for the area and guides new development throughout the South Dublin County.

The proposed development will contribute to the delivery of housing in accordance with the approved Clonburris SDZ Planning Scheme, which forms part of the Development Plan. The proposed development therefore aligns with the policies and objectives of the Core Strategy.

5.5 Environmental Assessments

This application is accompanied by an Environmental Impact Assessment Report, co-ordinated by Stephen Little & Associates.

An Appropriate Assessment Screening Report, prepared by Minogue + Associates also accompanies this application.

6 SITE DESCRIPTION & CONTEXT

6.1 Application Site

The overall Clonburris SDZ Planning Scheme lands extend to a gross development area of approximately 280 ha, with a net development area of c.151 ha. The approved SDZ Planning Scheme has development potential for c.9,500 dwellings.

SDCC ownership extends to 39.5 ha of the Planning Scheme lands. They have been subject of a Masterplan study for approximately 2,600 dwellings. The primary landowners within the Clonburris SDZ are currently progressing the approval and delivery of the necessary shared infrastructure to enable the overall delivery of the SDZ Planning Scheme.

The application site, subject of this Part 10 application to An Bord Pleanála, comprises three land parcels, “Site 3”, “Site 4” and “Site 5”. All are located within the Kishoge Development Area of the adopted Clonburris SDZ Planning Scheme (with the exception of a portion of Site 5b, which lies outside the SDZ boundary). All three sites, together comprising the application site, are in South Dublin County Council ownership.

6.1.1 Site 3

Site 3 located within ‘Development Area 7- Kishoge North West’ and ‘Development Area 6- Kishoge Urban Centre’ of the Clonburris SDZ Planning Scheme.

Site 3 is bounded generally by Lucan East Educate Together National School and Oldbridge housing estate to the north; Tullyhall residential housing estate to the west; Adamstown Avenue and Kishoge train station and Dublin-Cork rail line to the south; and, Grange Castle Road (R136) to the east.

The existing ESB Balgaddy Regional Substation is located centrally within Site 3, north of Adamstown Avenue. A SIRO telecommunications mast is also located on site. The site currently accommodates an unused ‘park and ride’ carpark and access gate to Balgaddy Train station to the west of Grange Castle Road and north of the high-speed rail line.

The proposed development at Site 3 will be accessed from Adamstown Avenue and the Clonburris Northern Link Street (NLS). The NLS was granted permission on 10 February 2025 under SDCC Reg. Ref. SDZ24A/0033W. The NLS can be accessed via Adamstown Avenue to the west and Grange Castle Roads to the east.

6.1.2 Site 4

Site 4 is located within ‘Development Area 8- Kishoge South West’ of the Clonburris SDZ Planning Scheme.

Site 4 is bounded to the north by the Dublin-Cork rail line, to the west by Griffeen Valley Park extension, by a linear park permitted under SDCC Reg. Ref. SD228/0003 to the east and the Grand Canal corridor to the south.

The development site is primarily greenfield. However, parts of it have been utilised by the SDCC Parks Department as a depot and tree nursery. It also includes existing traveler accommodation, Lynch’s Lane, and Grange House (a building of local heritage interest).

The proposed development will be accessed from the permitted Southern Link Road (SLR), granted under SDCC Reg. Ref. SDZ20A/0021 from which vehicular, cycle and pedestrian access is provided.

6.1.3 Site 5

Site 5 is located within ‘Development Area 10 – Kishoge North East’ and ‘Development Area 6 – Kishoge Urban Centre’.

Site 5 consists of two parcels (5a and 5b) located to the north of Kishoge Train Station and east of the R136 roundabout, intersected by Thomas Omer Way. One parcel is bounded by the Foxborough and

Omer Walk housing estates to the north, Griffeen Community College and Thomas Omer Way to the south. The second parcel is bound by Thomas Omer Way to the north, Lynch Lane to the east and Grange Castle Road (R136) to the west.

Vehicular, pedestrian and cycle access to the parcel in the south will be from Thomas Omer Way via a new left-in-left-out junction at Lynch Lane and from the R136 via the permitted Northern Link Street (granted under Reg. Ref. SDZ24A/0033W). Vehicular, pedestrian and cycle access to the north parcel will be from Thomas Omer Way via a new signalised junction.

New pedestrian connections are facilitated to the Foxborough and Omer Walk residential estates.

7 STATUTORY PLANNING HISTORY

A planning search of the SDCC online Planning Register was undertaken by Stephen Little & Associates, to identify relevant planning consents for development within the SDZ lands within the past 10 years.

From this research we understand that there has been no recent planning permission for residential development or other uses within the application site (Sites 3, 4 & 5). However, permissions for significant road and water services have been obtained by a conglomerate of landowners (Clonburris Infrastructure Limited), extending through the Application Site.

Beyond that, 14no. significant recent planning permissions have been granted within the surrounding SDZ lands.

The relevant planning references and associated summary descriptions are provided below, relating to the application site itself and the wider Clonburris SDZ area.

7.1 Application Site (Site 3, Site 4 & Site 5)

7.1.1 SDCC Reg. Ref. SDZ24A/0033W Infrastructure – including Clonburris North Link Street

On 06 December 2024, Clonburris Infrastructure Limited (CIL) applied to SDCC for permission for the construction of:

- c. 2.3km of a new Link Street - Clonburris Northern Link Street (CNLS).
- c. 800m of side streets.
- Provision/upgrade of 12no. signalised junctions.
- c. 2km of upgrading of existing streets.
- Provision of 2 main public parks centrally.
- Drainage infrastructure works.

SDCC granted permission on 10 February 2025.

The permitted road infrastructure (North Link Street) provides access to Site 3 and Site 5, subject of this application.

7.1.2 SDCC Reg. Ref. SDZ20A/0021 Infrastructure – including Clonburris Southern Link Street

On 22 December 2020, Clonburris Infrastructure Limited (CIL), applied for permission for roads and drainage infrastructure works, consistent with the Clonburris SDZ Planning Scheme (2019), including: -

- Roads and drainage infrastructure works for the future development of the southern half of the overall Clonburris SDZ lands; the roads infrastructure works, including:
- The construction of c. 4.0km of a new road, known as Clonburris Southern Link Street (CSLS);
- A number of vehicular access spurs to facilitate future development of adjoining lands, a total of 8 new junctions (including 3 junctions to facilitate future road developments within the SDZ;
- Drainage infrastructure works, including 8 attenuation systems (with outfalls to Griffeen River, Kilmahuddrick Stream and existing storm sewers) with 4 ponds, 2 modular underground storage

systems and 2 detention basins, combined with modular underground storage systems, all adjacent to the CSLS;

- Surface water drainage culverts to existing watercourses; and
- Ducting for public electrical services and utilities and the diversion of existing utilities within the proposed road corridor.

Further information was requested on 24 February 2021. A Grant of Permission was made on 12 August 2021.

The permitted road infrastructure (South Link Street) provides access to Site 4, subject of this application.

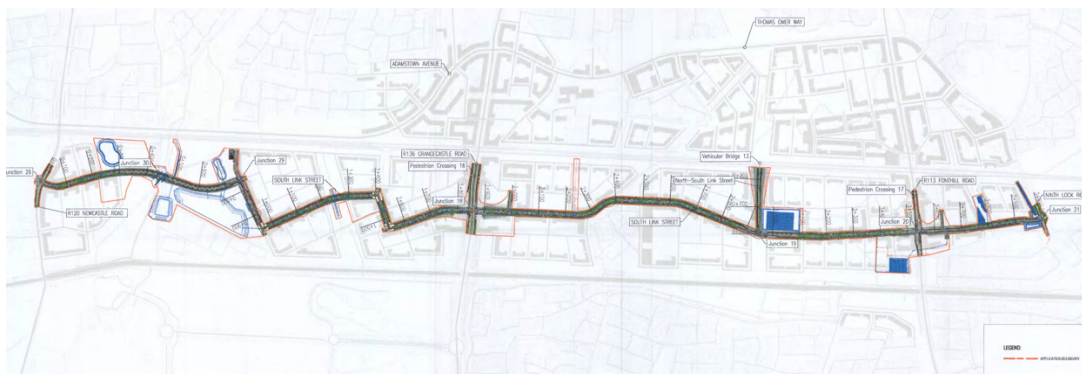


Figure 2: Extract from Site Layout Plan Reg. Ref. SDZ20A/0021

7.2 Wider SDZ Area

7.2.1 SDCC Reg. Ref. SDZ23A/0043 SDZ Application

On 30 November 2023, Cairn Homes Properties Limited applied for permission for **495no. residential units and creche (483sqm)** located at ground floor level of Block E on lands measuring c. 5ha. The development provides for a total of 449no. apartments and 46no. duplex units, and non-residential use including **retail (2,502sqm), employment (4,607sqm) and café (87sqm)**.

Further information was requested on 2 February 2024, and a decision to Grant Permission subject to was made on 17 April 2024.

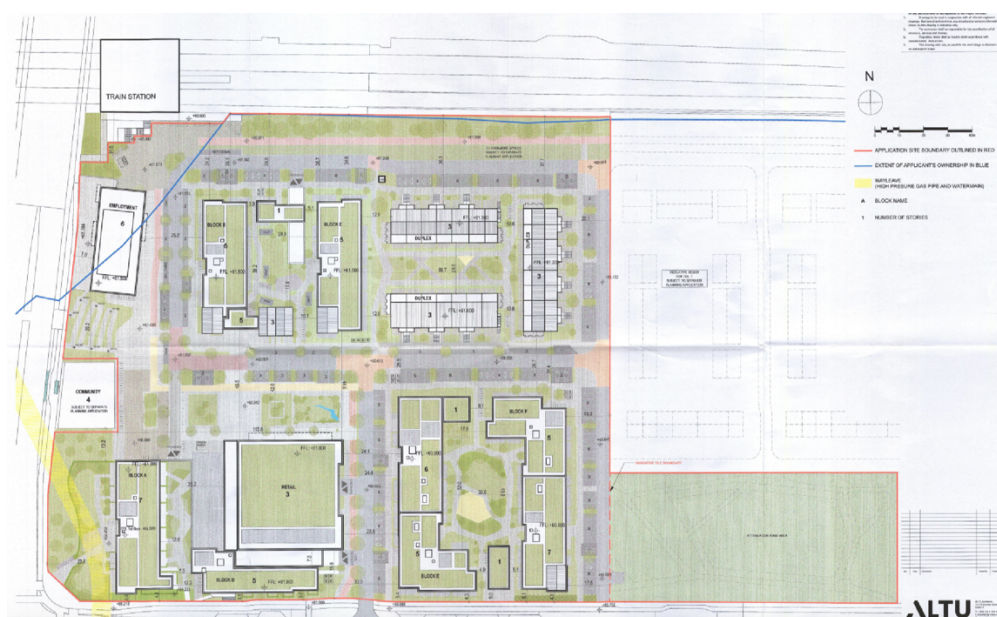


Figure 3: Extract from Site Layout Plan Reg. Ref. SDZ23A/0043

7.2.2 SDCC Reg. Ref. SDZ23A/0018 SDZ Application

On 26 May 2023, Cairn Homes Properties Ltd., applied for permission for **565no. residential units**. The development provides for a total of 230no. houses, 119no. apartments and 216no. duplexes.

Further information was requested on 20 July 2023, and a decision to Grant Permission was made on 11 December 2023.

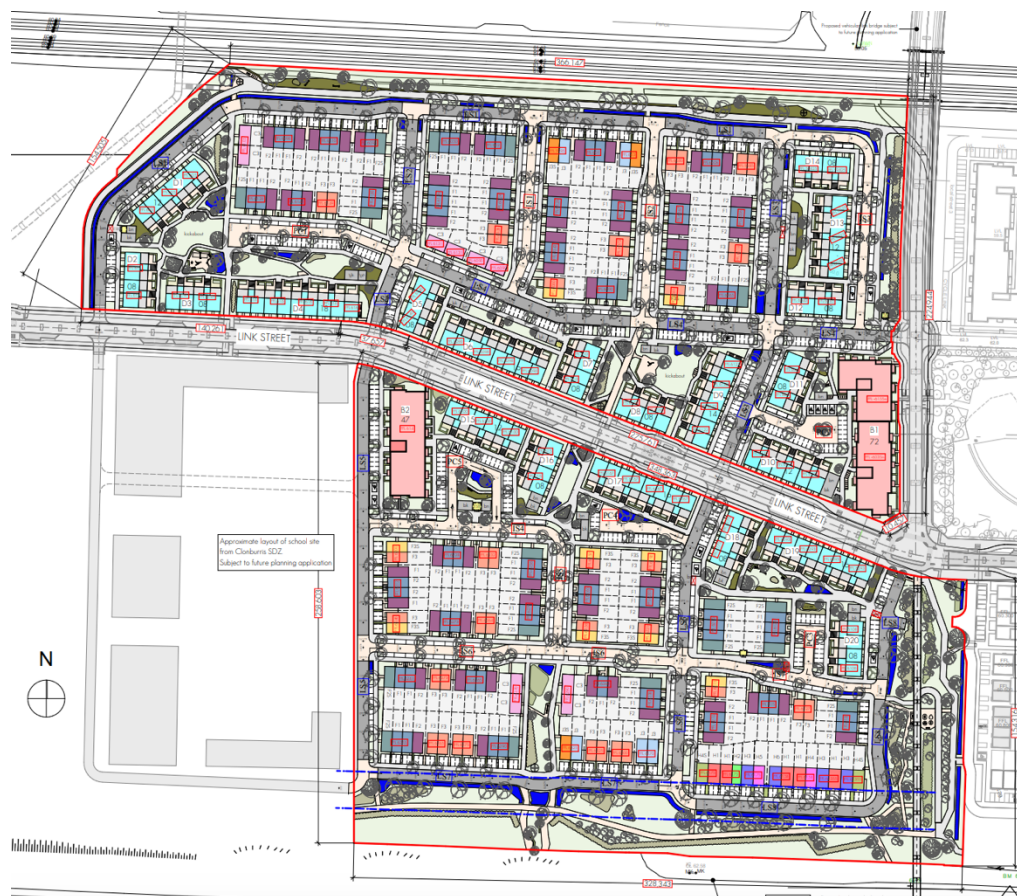


Figure 4: Extract from Site Layout Plan Reg. Ref. SDZ23A/0018

7.2.3 SDCC Reg. Ref. SDZ23A/0004 SDZ Application

On 10 February 2023, Clear Real Estate Holdings Limited applied for permission for **385 residential units**. The development provides for a total of 139no. houses, 70 Build-to-Rent duplex / apartments, 72no. duplex / apartments and 104no. apartments.

Further information was requested on 6 April 2023. By Order dated 28 September 2023. the period for submitting a response to the Further Information request was extended up to and including 15 January 2024, and a decision to Grant Permission was made on 15 December 2023.



Figure 5: Extract from Site Layout Plan Reg. Ref. SDZ23A/0004

7.2.4 SDCC Reg. Ref. SDZ22A/0018 SDZ Application

On 15 December 2022, Cairn Homes Properties Ltd., applied for permission for **mixed-use development** comprising **594no. apartments, creche (c. 609sqm)** at ground floor and first floor of Block A, **office (c. 4,516sqm), and retail (c. 887.5sqm).**

Further information was requested on 17 February 2023. By Order dated 13 July 2023, the period for submitting a response to the Further Information request was extended up to and including 12 November 2023. Clarification of Additional Information was requested on 18 September 2023, and a decision to Grant Permission was made on 31 October 2023.

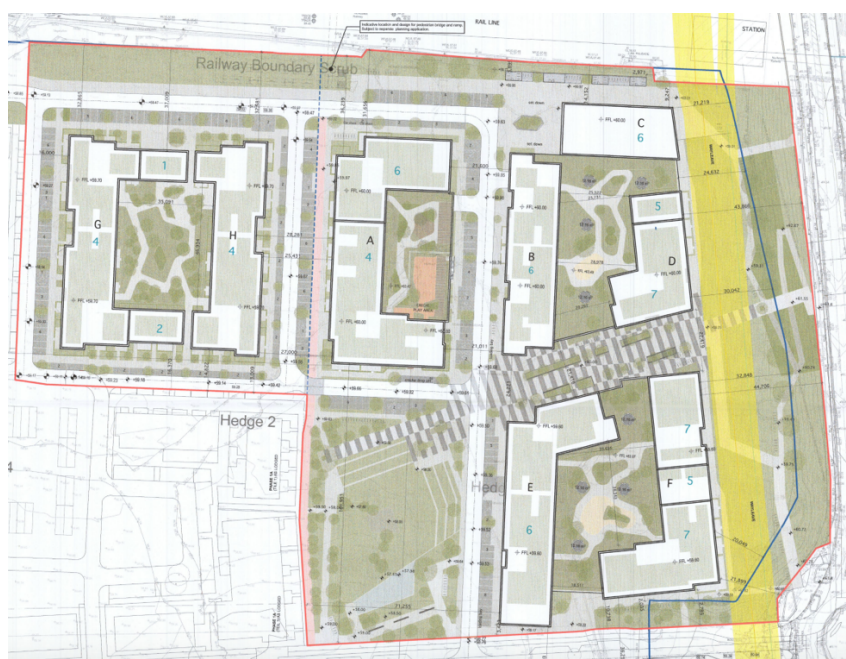


Figure 6: Extract from Site Layout Plan Reg. Ref. SDZ22A/0018

7.2.5 SDCC Reg. Ref. SDZ22A/0017 SDZ Application

On 2 December 2022, Cairn Homes Properties Limited, applied for permission for **157no. dwellings**. The development provides for a total of 81no. houses and 76no. apartments.

Further information was requested on 7 February 2023, and a decision to Grant Permission was made on 16 May 2023.



Figure 7: Extract from Site Layout Plan Reg. Ref. SDZ22A/0017

7.2.6 SDCC Reg. Ref. SDZ22A/0010 SDZ Application

On 4 July 2022, Kelland Homes Ltd., applied for permission for **mixed-use development** comprising **294no. residential units and 1no. 2-storey creche (c. 520.2sqm)**. The development provides for a total of 118no. 2,3 & 4 bed, 2-storey semi-detached and terraced houses, 104no. 2 & 3 bed duplex units, 72no. apartments, and non-residential use including **1no. 2-storey retail/commercial unit (152.1sqm)**.

Further information was requested on 29 August 2022. Clarification of Additional Information was requested on 4 January 2023. By Order dated 23 February 2023, the period for submitting a response to the request for Clarification of Further Information was extended up to and including 9 June 2023, and a decision to Grant Permission was made on 2 May 2023.



Figure 8: Extract from Site Layout Plan Reg. Ref. SDZ22A/0010

7.2.7 SDCC Reg. Ref. SD228/0003 - Part 8 Housing

On 27 April 2022, South Dublin County Council (Housing) applied for permission for **263no. social and affordable residential units**.

The Part 8 application was approved by South Dublin County Council on 11 July 2022.



Figure 9: Extract from Site Layout Plan Reg. Ref. SDZ28/0003

7.2.8 SDCC Reg. Ref. SD228/0001 Part 8 Housing

On 31 March 2022, South Dublin County Council applied for permission for **118no. residential units**.

The Part 8 application was approved by South Dublin County Council on 13 June 2022.



Figure 10: Extract from Site Layout Plan Reg. Ref. SDZ228/0001

7.2.9 SDCC Reg. Ref. SDZ21A/0022 SDZ Application

On 2 December 2021, Cairn Homes Properties Ltd., applied for permission for **569no. dwellings and creche (c. 547sqm)** in a part 3/4 storey local node building in CSWS4. The development provides for a total of 173no. houses and 148no. duplex apartments, 396no. apartments, and non-residential use including an **innovation hub (626sqm)**.

Further information was requested on 4 February 2022, and a decision to Grant Permission was made on 23 August 2022.



Figure 11: Extract from Site Layout Plan Reg. Ref. SDZ21A/0022

7.2.10 SDCC Reg. Ref. SDZ22A/0011 SDZ Application – Primary School

On 2 August 2022, The Department of Education, applied for permission for a primary school (c. 3,355sqm). The development provides for a total of 16no. classrooms and 2no. Special Educational Needs Unit.

Further information was requested on 26 September 2022, and a decision to Grant was made on 16 February 2023.

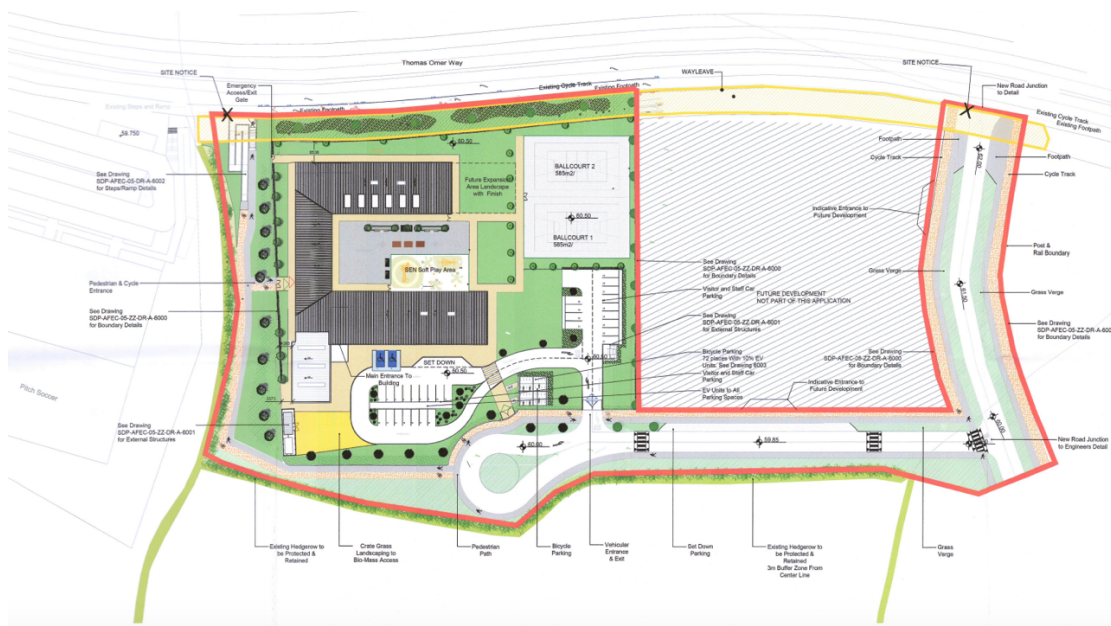


Figure 12: Extract from Site Layout Plan Reg. Ref. SD222A/0011

7.2.11 SDCC Reg. Ref. SD221A/0013 SDZ Application – Post Primary School

On 2 June 2021, The Department of Education, applied for permission for a 3-storey, 1,000 pupil post primary school including a 4 classroom Special Educational Needs Unit (11,443sqm).

Further information was requested on 27 July 2021, Clarification of Additional Information was requested on 12 January 2022, and a decision to Grant Permission was made on 21 February 2022.

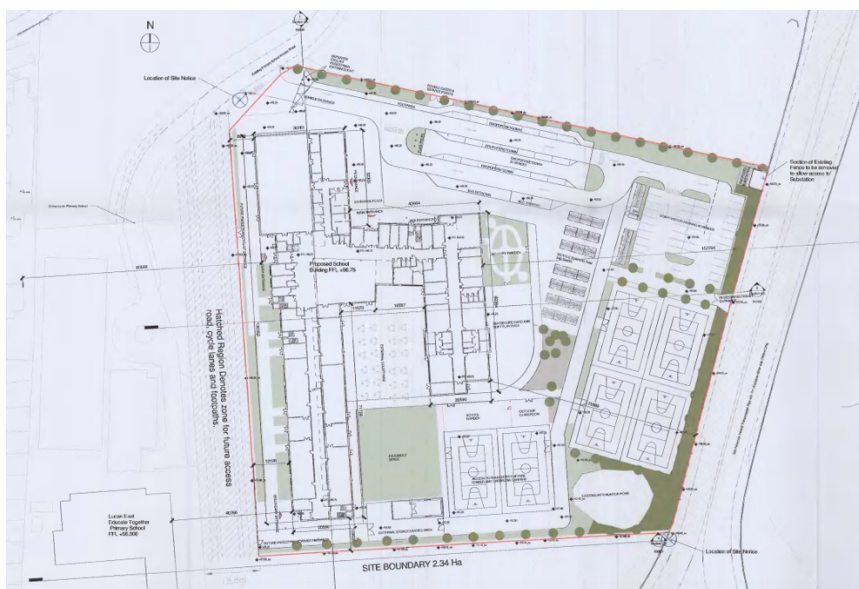


Figure 13: Extract from Site Layout Plan Reg. Ref. SD221A/0013

7.2.12 SDCC Reg. Ref. SD13A/0048 - Post Primary School

On 21 March 2013, County Dublin VEC applied for permission for the construction of a new post primary school with a capacity for 1,000 pupils (c. 9,941sqm).

A decision to Grant Permission was made on 15 May 2013.

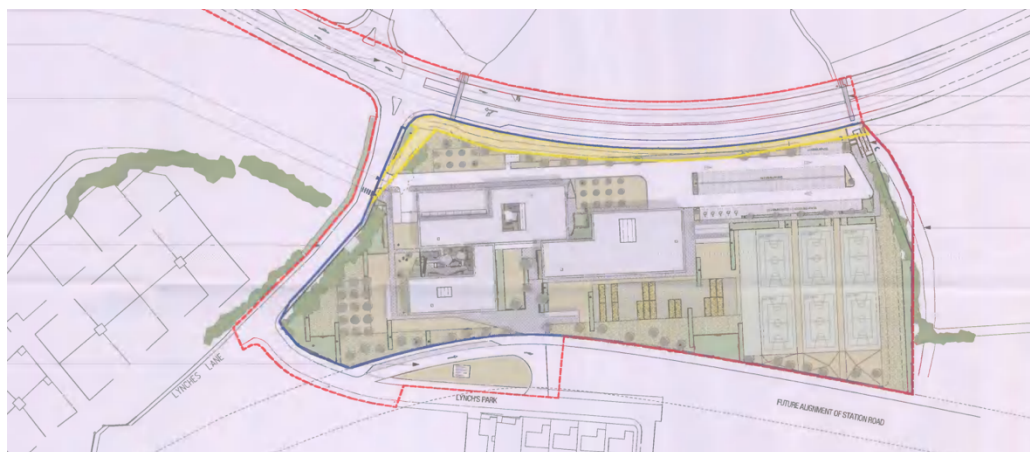


Figure 14: Extract from Site Location Plan Reg. Ref. SDZ13A/0048

7.2.13 SDCC Reg. Ref. SD10A/0238 16no. Primary Classroom School

On 12 August 2010, The Minister for Education and Skills applied for permission for a 16no. classroom primary school, of which 8no. classrooms have been constructed to date, comprising revised floor plans and elevations for 8no. classrooms, general purpose room, library and ancillary accommodation and additional 2no. class Special Needs Unit.

A decision to Grant Permission was made on 17 November 2010.

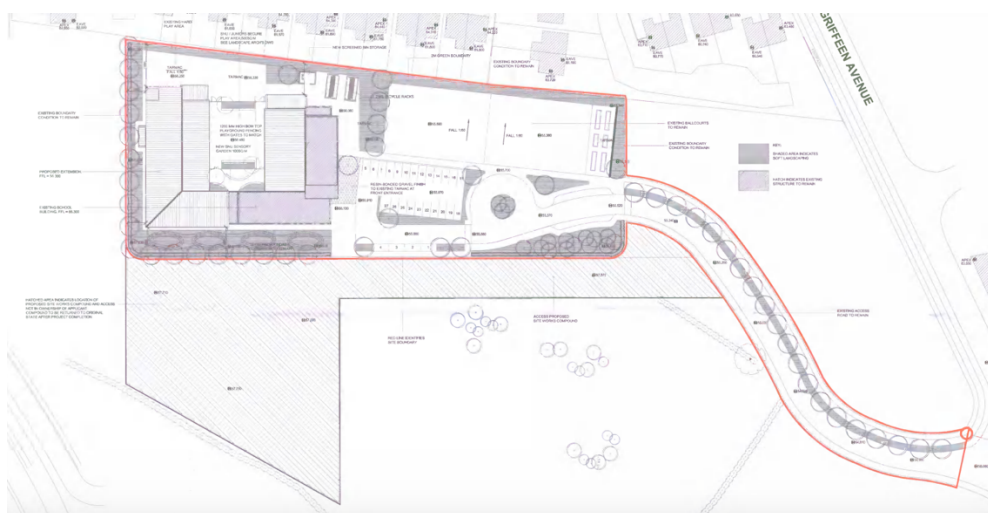


Figure 15: Extract from Site Location Plan Reg. Ref. SD10A/0238

7.3 Planning History - Summary Findings

The Clonburris Strategic Development Zoned (SDZ) lands is experiencing significant growth in development activity. Over recent years, a number of housing developments and infrastructure projects have been permitted within the SDZ. This area, designated for planned growth, is focused on creating a well-structured urban community with housing, local services and amenities, schools and essential infrastructure.

We refer the Board to Section 11.7 of this Report which addresses the phasing requirements of the Clonburris SDZ Planning Scheme.

8 PARTICULARS OF PROPOSED DEVELOPMENT

8.1 Description of Proposed Development

The combined application is for a total of 1,252no. residential units, 2no. childcare facilities, a community pavilion, future reuse of Grange House for employment use, retail space, public open space and all associated ancillary site development works at lands within the Clonburris SDZ Planning Scheme area.

8.1.1 Site 3

The proposed development at Site 3 comprises the construction of **580no. dwellings**, including 130no. 2-storey 3-bedroom houses; 15no. 3-storey 3-bedroom houses; 76no. apartment units (32no. 1-bedroom, 36no. 2-bedroom and 8no. 3-bedroom) accommodated in 2no. 5-storey apartment buildings with balconies on all elevations; 356no. duplex units (108no. 1-bedroom, 115no. 2-bedroom, and 133no. 3-bedroom) and 3no. 3-bedroom triplex units accommodated in 24no. 3-storey duplex blocks, with balconies on rear and/or front elevations. 1no. 2-storey **childcare facility (c.553 sq. m)**.

And all associated and ancillary site development, landscape and boundary works, including public open space (c. 7,015 sq. m) and communal open space (c. 3,079sqm); 456no. surface car parking spaces (total); 1,116no. bicycle parking spaces (total); 7no. ESB substations; and the diversion and rerouting of ESB 10KV and 38KV cabling; public lighting. New vehicular site, pedestrian and cycle access to Site 3 is proposed from existing Adamstown Avenue, the consented Northern Link Street (SDZ24A/0033W) and from the existing site entrance at Tullyhall Rise. New pedestrian access is proposed via the permitted green link (SDZ24A/0033W) adjacent to Lucan East Educate Together National School to the north and via the existing public open space at Rossberry Park to the north east.

8.1.2 Site 4

The proposed development at Site 4 comprises the construction of **436no. dwellings**, including 141no. houses (133no. 3-bedroom and 8no. 4-bedroom) ranging from 2 to 3-storeys in height; 124no. apartment units (62no. 1-bedroom and 62no. 2-bedroom) accommodated in 3no. apartment buildings ranging from 4 to 6-storeys in height, with balconies/terraces on all elevations; 106no. duplex units (53no. 2-bedroom and 53no. 3-bedroom) and 57no. 2-bedroom triplex units accommodated in 19no. 3-storey duplex blocks, with a combination of rear gardens, and balconies/ terraces on all elevations; 3no. 1-bedroom age-friendly apartments accommodated in a 1-storey apartment building, with a rear courtyard garden; 5no. 2-bedroom garden apartments accommodated in a 1 to 2-storey apartment building with a front and rear courtyard garden. 1no. **childcare facility (c. 544 sqm)** and 1no. **retail unit (c. 150 sqm)** at ground floor of apartment Block F and 1no. **community building/ pavilion (c. 683 sq m)**, all fronting Griffeen Valley Park; and, proposed refurbishment of existing **Grange House for employment reuse (c. 173 sq m)**.

And all associated and ancillary site development, landscape and boundary works, including public open space (c. 778 sqm) and communal open space (c. 1,621 sqm); 408no. surface car parking spaces (total); 793no. bicycle parking spaces (total); 3no. ESB substations and 5no. ESB substation kiosks; public lighting; bin stores. New vehicular, pedestrian and cycle access to the site is proposed from the permitted Southern Link Road (SDZ20A/0021).

8.1.3 Site 5

The proposed development at Site 5 will consist of: the construction of **236no. dwellings** comprising 35no. 2-storey 3-bedroom houses; 110no. 3-storey duplex units (53no. 2-bedroom and 57no. 3-bedroom); 33no. 3-storey 2-bedroom triplex units; and 58no. apartments (37 no. 1-bedroom and 21 no. 2-bedroom) in a 6-storey over basement apartment block.

And all associated and ancillary site development, landscape and infrastructural works, including: c. 3,101 sq m public open space; communal open space (332 sq m) to serve the apartment building; balconies/terraces for the apartments and duplex/triplex units; 219no. car parking spaces (total);

628no. bicycle parking spaces (527no. resident spaces and 101no. visitor spaces); ESB substation (11.8 sq m), public lighting, boundary treatments, waste storage areas, drainage and open attenuation ponds.

To facilitate development, it is proposed to remove a section of the concrete noise barrier along Thomas Omer Way (within the Site 5 boundary only) and remnants of derelict structures and hardstand on lands to the south of Thomas Omer Way.

Vehicular, pedestrian and cycle access to the parcel in the south will be from Thomas Omer Way via a new left-in-left-out junction at Lynch Lane and from the R136 via the permitted Northern Link Street (granted under Reg. Ref. SDZ24A/0033W). Vehicular, pedestrian and cycle access to the north parcel will be from Thomas Omer Way via a new signalised junction.

New pedestrian connections are facilitated to the Foxborough and Omer Walk residential estates.

8.2 Unit Mix and Typologies

The proposed development provides a range of unit typologies, including houses, duplexes, triplexes and apartments, breakdown provided below: -

Typology	Site 3	Site 4	Site 5	Total
Houses	145	141	35	321
Duplexes	356	106	110	572
Triplexes	3	57	33	93
Apartments	76	132	58	266
Total	580	436	236	1,252

Table 2: Proposed unit typologies

The proposed development offers 1-bed, 2-bed, 3-bed and 4-bed units, breakdown provided below: -

Unit Mix	Site 3	Site 4	Site 5	Total	% Mix
1-Bed	140	65	37	242	19%
2-Bed	151	177	107	435	35%
3-Bed	289	186	92	567	45%
4-Bed	-	8	-	8	1%
Total	580	436	236	1,252	100%

Table 3: Proposed unit mix

We refer the Board to the enclosed Housing Quality Assessments, prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for further detail.

8.3 Density

Density across the entirety of the proposed development is c. 43 units per hectare, with site by site breakdown provided below: -

	Site 3	Site 4	Site 5
Density (dwellings /ha)	51	37	38

Table 4: Density breakdown

We refer the Board to Sections 11 to 14 inclusive of this Report, which provide further detail of how the proposed densities comply with the provisions of the Clonburris SDZ Planning Scheme for these site locations.

8.4 Non-Residential Development

The proposed development offers a range of non-residential uses as follows: -

Use	Site 3	Site 4	Site 5	Total
Creche	553 sqm	554 sqm	-	1,097 sqm
Community	-	683 sqm	-	683 sqm
Retail	-	146 sqm	-	146 sqm

Table 5: Non-residential uses proposed

Please refer to Sections 11 to 14 inclusive of this Report, which confirm that the above uses are in accordance with the provisions of the Clonburris SDZ Planning Scheme.

8.5 Public Open Space

The proposed development provides c. 10,598 sqm of public open space, located within Site 3 and Site 5: -

Proposal	Site 3	Site 4	Site 5	Total
Public open space (sq m)	7,015	778	3,101	10,894

Table 6: Breakdown of public open space provision

Each site facilitates the creation of local green infrastructure networks, where planting, pedestrian and cycling facilities are proposed, connecting to the railway station, Grand Canal corridor and/or public parks. Each site contains a network of street trees aligned with the road network.

Site 3 has three local parks and Site 5 has one. Site 4 is bordered by two strategic public open spaces, the Griffeen Valley Park extension and a linear park bordering Site 1 (east of Site 4).

We refer the Board to the enclosed landscape particulars prepared by Doyle O'Troithigh Landscape Architects, Bernard Seymour Landscape Architects and LDA Design for further detail.

8.6 Site Access

8.6.1 Site 3

Site 3 will be accessed by vehicles, cyclists and pedestrians from existing Adamstown Avenue and the consented Clonburris Northern Link Street (NLS).

The NLS was granted permission on 10 February 2025 under SDCC Reg. Ref. SDZ24A/0033W. The NLS can be accessed via Adamstown Avenue to the west and Grange Castle Roads to the east.

Pedestrian, cycle and vehicular access is also provided from the existing entrance at Tullyhall Rise, along the northern boundary of Site 3.

A pedestrian and cycle access is provided from the permitted green link under Reg. Ref. SDZ24A/0033W, located adjacent to Lucan East Educate Together National School, to the north of Site 3. A greenway will extend along the eastern boundary with the R136, where a utility service zone is present.

A new pedestrian access is proposed via Rossberry Park to the north west of Site 3.

8.6.2 Site 4

Site 4 will be accessed from the permitted Southern Link Road (SLR), granted under SDCC Reg. Ref. SDZ20A/0021 from which vehicular, cycle and pedestrian access is provided.

8.6.3 Site 5

Vehicular, pedestrian and cycle access to the parcel in the south will be from Thomas Omer Way via a new left-in-left-out junction at Lynch Lane and from the R136 via the permitted Northern Link Street (granted under Reg. Ref. SDZ24A/0033W). Vehicular, pedestrian and cycle access to the north parcel will be from Thomas Omer Way via a new signalised junction.

New pedestrian connections are facilitated to the Foxborough and Omer Walk residential estates.

8.7 Car Parking

The proposed development provides a total of 1,083no. surface car parking spaces, breakdown as follows: -

Site 3	Site 4	Site 5	Total
456no.	408no.	219no.	1,083no.

Table 7: Breakdown of car parking provision

We refer the Board to Section 10.5 this Planning Report which demonstrates that the car parking proposed, including electric vehicle charging facilities, is consistent with the provisions of the Development Plan.

Sections 11 to 14 inclusive of this Report demonstrates consistency with the Clonburris SDZ Planning Scheme, including with its car parking requirements.

8.8 Bicycle Parking

The proposed development provides a total of 2,537no. bicycle parking spaces, breakdown as follows: -

	Site 3	Site 4	Site 5	Total
Long-Term Bicycle Parking Provision	882	591	527	2,000
Visitor Bicycle Parking Provision	234	202	101	537

Table 8: Breakdown of bicycle parking provision

We refer the Board to Section 10.4 of this Report which demonstrates compliance with the bicycle parking requirements of the Development Plan.

Sections 11 to 14 inclusive of this Report address the consistency of the proposed development with the Clonburris SDZ Planning Scheme, including its bicycle parking requirements.

8.9 Water & Drainage

8.9.1 Wastewater

Site 3

It is proposed that the foul water generated in Kishoge Site 3 sub-catchment A will discharge into the existing Oldbridge foul outfall to the northwest of the proposed site. Foul water from Kishoge Site 3 sub-catchment B will be collected by sewers to be constructed as part of North Link Street (NLS) works, discharged via gravity towards pumping station 3 (to the northeast of the site) and pumped east where it eventually discharges at the existing 9B trunk sewer on R113 Fonthill Road.

We refer the Board to the enclosed Infrastructure Design Report, prepared by DBFL Consulting Engineers for further detail.

Site 4

It is proposed to discharge all foul effluent from the proposed development by gravity to the foul sewers in the South Link Street (SLS). Throughout the development site and at each connection, the manholes within the site shall be in accordance with SDCC and Uisce Éireann 'taken in charge' requirements, and accessible for maintenance purposes. The final number and specifications of these connections to the external foul drainage network will be finalised at detailed design stage, through the Uisce Éireann connection application process.

Each individual residential dwelling fronting the SLS will have its own connection to the 300mm diameter foul sewer within the SLS. Spurs to service these dwellings shall be provided during the SLS construction, having been coordinated through regular meetings with the Clonburris Infrastructure Limited (CIL) team.

Site 5

Site 5 will be served by an existing 225mm foul line along Foxborough Court to the north of Site 5B and a 300mm foul line along Lynch's Park/Northern Link Street to the south of Thomas Omer Way. Although not yet installed, it is anticipated that the water service and drainage networks facilitating development in Site 5A will be in place prior to construction.

We refer the Board to the enclosed Infrastructure Design Report, prepared by RPS Consulting Engineers for further detail.

We refer the Board to the enclosed Infrastructure Design Report, prepared by CS Consulting Engineers for further detail.

8.9.2 Water Supply

Site 3

Site 3 watermain will connect into the NLS trunk watermain infrastructure and the existing watermain infrastructure within Adamstown Avenue, creating three separate 180mm primary watermain loops serving the proposed development site. The 180mm loops within the subject site will then feed smaller 125mm distribution watermain.

The connection to the public water main will include a metered connection with sluice valve arrangement in accordance with the requirements of Uisce Éireann .

Individual houses will have their own connections to the distribution main via service connections and boundary boxes. Individual service boundary boxes will be of the type to suit Uisce Éireann and to facilitate domestic meter installation.

We refer the Board to the enclosed Infrastructure Design Report, prepared by DBFL Consulting Engineers for further detail.

Site 4

It is proposed to provide 150mm and 200mm internal diameter mains to service this development. These mains shall be interconnected and fed by new connections to the 150mm diameter and 200mm diameter spurs provided along in the SLS.

Each apartment block shall have 1no. connection to supply its residential elements. Individual, smaller connections shall be provided to the non-residential elements within each apartment block. The exact details of all connections will be finalised at detailed design stage, through the Uisce Éireann connection application process.

Each individual residential dwelling fronting the SLS will have its own connection to the 180mm diameter distributor main within the SLS. Spurs to service these dwellings will be provided during the SLS construction, having been coordinated through regular meetings with the CIL team.

We refer the Board to the enclosed Infrastructure Design Report, prepared by CS Consulting Engineers for further detail.

Site 5

The proposed development at Site 5 includes new watermain infrastructure that will connect with the existing and planned water supply network surrounding the site. These include a planned 180mm diameter polyethylene (PE) watermain which is to be installed on the south side of Thomas Omer Way and along Lynch Lane, as well as a 400mm diameter PE watermain to be delivered with the Northern Link Street. An existing watermain running along the north of Thomas Omer Way will also be used to serve the proposed development.

We refer the Board to the enclosed Infrastructure Design Report, prepared by RPS Consulting Engineers for further detail.

8.9.3 Surface Water

Site 3

Site 3 will benefit from trunk surface water infrastructure proposed as part of the Clonburris Infrastructure Development for which planning was granted under reference SDZ24A/0033W. The planning application included trunk surface water sewers and regional attenuation to serve the subject site, this strategic infrastructure aligns with the SWMP proposals and allows for a treatment train of SuDS measures within individual sites and within the regional features.

It is intended that the stormwater run-off generated from the proposed development will be collected in a new gravity sewer and discharged to the regional attenuation systems constructed as part of the NLS. The subject site is in Catchment 1 within the Clonburris SWMP and will discharge to attenuation pond ATN 03.

The downstream regional attenuation system ATN 03 will consist of an open attenuation pond. Outflow from the attenuation structure within the SDZ limits flow to a rate of 3.1 l/s/ha as detailed in the SWMP for the SDZ.

We refer the Board to the enclosed Infrastructure Design Report, prepared by DBFL Consulting Engineers for further detail.

Site 4

It is intended to discharge at an unrestricted rate to this surface water network from the development site into the proposed 300mm diameter to 600mm diameter spurs, , permitted under SDCC Reg. Ref. SDZ20A/0021. From there it shall continue to the regional attenuation ponds and outfall to the

Kilmahuddrick Stream (as described in sub-section 5.4 of the Engineering Services Report, prepared by CS Consulting). Integration of the proposed development with this existing infrastructure ensures that stormwater runoff from the development site shall not flow into neighbouring sites but shall instead be collected and subsequently released in a controlled manner after the peak storm duration has passed.

It is proposed to discharge surface water run-off from the proposed development by gravity via new connections to the 300mm diameter to 600mm diameter surface water spurs along the SLR extent. At each connection, the manholes shall be in accordance with SDCC requirements and standard details, and accessible for maintenance purposes.

The proposed stormwater drainage arrangements have been designed in accordance with Part H of the Building Regulations 2010 (Building Drainage), the Greater Dublin Regional Code of Practice for Drainage Works (Version 6), British Standard BS EN 752:2008 (Drains and Sewer Systems Outside Buildings), and the Greater Dublin Strategic Drainage Study (GDSDS).

We refer the Board to the enclosed Infrastructure Design Report, prepared by CS Consulting Engineers for further detail.

Site 5

Separate surface water collection networks are proposed for Sites 5A and 5B together with a suite of SuDS measures including detention basins, green/blue roof, permeable paving and bioretention tree pits.

The proposed surface water network for Site 5A comprises a 225mm to 300mm diameter collection network discharging into a main 1050mm diameter surface water pipe running through the middle of the site. This pipe discharges collected site surface runoff into the adjacent existing main drainage systems.

For Site 5B, an in-situ surface water collection network is proposed via nature-based solutions. Collected site runoff will be attenuated first through the two attenuation ponds located in the north-west of the site before discharging into an existing 1050mm diameter surface water drainage pipe north via Foxborough Court to Balgaddy Road. Site surface runoff will be treated through a petrol interceptor before discharging into the detention basins.

We refer the Board to the enclosed Infrastructure Design Report, prepared by RPS Consulting Engineers for further detail.

8.10 Flood Risk

8.10.1 Site 3

We refer the Board to the enclosed Site 3- Flood Risk Assessment, prepared by DBFL Consulting Engineers which concludes: -

The (Stage 1) Flood Risk Identification determined that the site is not likely to be impacted by future flood events. Although a number of past flood events occurred within a 2.5km radius, there were no historical flood events recorded within the proposed development site. CFRAM maps show that the proposed development site is not likely to be impacted by fluvial or coastal flooding.

The (Stage 2) Initial Flood Risk Assessment determined that there are no significant potential flood sources that may affect the proposed development site. Therefore, the proposed development site is categorised as 'Flood Zone C'. Due to the existing ESB substation, the proposed development is classified as a 'Highly Vulnerable Development'. Although there was no need for further justification, a detailed assessment was carried out.

The (Stage 3) Detailed Flood Risk Assessment analysed the potential risk of flooding regarding the existing ESB substation and the proposed adjacent attenuation pond. The detailed assessment concluded that the existing ESB substation is not at risk from flooding. The proposed adjacent attenuation pond is designed to have a top water level of 56.401m AOD

(For a 1% AEP storm) and a top of bank level of 56.80m. This top of water level of the attenuation pond is over 0.5m lower than the ESB substation level of 56.90m. An overland flood route will direct any excess surface water away from the ESB substation towards the northwest of the site

8.10.2 Site 4

We refer the Board to the enclosed Site 4- Flood Risk Assessment, prepared by JBA Consulting which concludes: -

This Flood Risk Assessment (FRA) demonstrates that, with the proposed mitigation measures in place, the development can proceed without increasing flood risk to the site or surrounding areas and the Justification Test has been applied and passed. Furthermore, the design approach ensures compliance with the South Dublin County Council Development Plan and SFRA, providing a resilient and sustainable solution for the Clonburris development.

In conclusion, this FRA confirms that the proposed development is suitable for its location, aligns with the best flood risk management practices, and supports the sustainable development goals of the planning framework. The proposed measures ensure that the site remains resilient to current and future flood risks, while maintaining compliance with local and national planning policies.

8.10.3 Site 5

We refer the Board to the enclosed Site 5- Flood Risk Assessment, prepared by RPS Consulting Engineers which concludes: -

The flood data reviewed in Section 4 identified no historical fluvial, pluvial or groundwater flood risk within the proposed development site and its immediate vicinity. Further to this, in the Eastern CFRAM study and also the Groundwater flood studies carried by GSI also did not identify any future fluvial and groundwater flood risks within the proposed site or its immediate vicinity. Flood zones maps prepared in the SFRA undertaken as part of the South Dublin County Development Plan 2022-2028 showed the subject site is located in Flood Zone C (outside of Flood Zones A & B). Therefore, there is no need to progress to Stage II FRA.

In the South Dublin County Development Plan 2022-2028, the Proposed Development site is located within the Clonburris Strategic Development Zone (SDZ), with zones of residential development and open space, and general enterprise are also featuring in the area. Based on the Planning Guidelines, the proposed residential development at the subject site is deemed appropriate.

Through implementation of best practice engineering methods, it is not envisaged that the proposed development will be at risk of nor exacerbate flood risk at the site and its immediate vicinity. Any increase in surface runoff generated by the proposed developed will be attenuated and treated through a suite of SuDs type drainage systems as discussed above, before discharging into the adjacent surface water drainage network with a hydrobrake implemented at the outfall manhole to limit outflow to greenfield runoff rates. This therefore will not pose any increased flooding risks at the adjacent lands and properties.

9 STRATEGIC PLANNING POLICY CONTEXT

9.1 National Planning Framework – Ireland 2040

The Government approved the Draft Final Revised National Planning Framework on 8 April 2025 which was subsequently approved by the Seanad and the Dáil in the following weeks. National Planning Framework (NPF) First Revision (2025) Project Ireland 2040 establishes the Government's strategic plan for Ireland's future growth and development up to the year 2040. It is a top priority of the NPF to focus on developing existing settlements and avoiding the urban sprawl of towns and cities, with a National Policy Objective (NPO) of at least 40% of all new housing to be delivered within the existing built up areas (NPO 7, p22).

The **National Strategic Outcome (NSO)** for Compact Growth aims to realise the potential of cities, towns, and villages by prioritising the sustainable growth of strategic areas. This NSO relates to the proposed development and is stated as follows:

COMPACT GROWTH - *Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority. (p6)*

Compact and sustainable growth requires consideration on the liveability of an urban space and in doing so, reduces the harmful environmental impacts by utilising the existing infrastructure and improving the viability of public transport. NPO 12 is as follows:

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being. (p49)

The NPF identifies Dublin as one of the five cities in which 50% of all new homes will be delivered within their existing built up footprint, as set out in NPO 8 (p22).

The proposed scheme will deliver a high quality residentially led development within the Clonburris SDZ Planning Scheme area, consistent with the provisions and objectives of the NPF 2025.

9.2 Regional Spatial & Economic Strategy for the Eastern & Midlands Area 2019 – 2031

The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) (2019-2031), informed by the NPF, is a strategic plan that provides a framework for regional spatial planning for this Region.

The Region is divided into three subregions referred to as Strategic Planning Areas (SPAs). The Dublin Metropolitan Area is an SPA and the Dublin Metropolitan Area Strategic Plan (DMASP) is relevant to the development of Clonburris as a Strategic Development Zone (SDZ).

The 3 Key Principles of the RSES include (p23):

Healthy Placemaking: *To promote people's quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.*

Climate Action: *The need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this.*

Economic Opportunity: *To create the right conditions and opportunities for the Region to realise sustainable economic growth and quality jobs that ensure a good living standard for all.*

Each Key Principle encompasses a set of Regional Strategic Outcomes (RSOs). Under the key principle of Healthy Placemaking, RSO 2, "Compact Growth and Urban Regeneration" is informed by NPF NSO 1, and is relevant to the plan-led strategic development of the Clonburris SDZ as follows:

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (p25)

The NPF compact growth ambitions for 'Dublin City and Suburbs' are further addressed in the DMAPS of the RSES. The DMAPS Guiding Principles for the growth of the Dublin Metropolitan Area seek to achieve the vision of sustainable development. This includes the delivery of compact sustainable growth and accelerated housing, which seeks:

To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport. (p101)

Regional Policy Objective (RPO) 4.3 seeks to:

Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.(p52)

DMASP identifies strategic residential and employment corridors for such growth. The Clonburris SDZ is identified as one such corridor, and the Clonburris SDZ Planning Scheme 2019 has been approved to guide such development in a plan-led and sustainable manner. We refer the Board to Section 11 of this Report for further discussion of the consistency of the proposed development with the Clonburris SDZ Planning Scheme.

9.3 Climate Action Plan 2025

Climate Action Plan 2025 builds upon last year's Plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with Climate Action Plan 2024. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

Identified in CAP24, CAP25 considers the key areas of focus in determining the actions necessary for delivering the sectoral emissions targets for transport. The transport actions for 2025, reflect continuation of, and are in line with, agreed policies set out in CAP23 and CAP24. The Department of Transport intends to progress work to recalibrate, add to, and amplify those policies over the coming months to inform an updated policy pathway.

CAP24 highlights the recommendations for the transport sector as set out by the Climate Change Advisory Council (CCAC). Recommendation 1, "Ireland's transport system needs to make accessible, sustainable transport modes more attractive and shift away from car dependency through consideration of the proximity between people and places in land use and housing policy", is considered to be relevant to Clonburris SDZ. The proposed development is located proximate to Kishoge commuter train station, and includes proposals for safe and convenient pedestrian and cycle connections to facilitate active, sustainable travel through the proposed housing, the train station and surrounding development.

9.4 National Sustainable Mobility Policy

The National Sustainable Mobility Policy is a strategic framework for reducing Ireland's greenhouse gas emissions by 51% by 2030, through active travel and public transport. Approximately 18% of greenhouse gas emissions come from transport alone, therefore switching to sustainable transport modes is vital towards meeting our goals for 2030.

Goal 9 of the National Sustainable Mobility Policy is to better integrate land use and transport planning at all levels. It aims to achieve the following:

Support compact growth and transport-orientated development through better integrated land use and transport planning. (p58)

In support of Goal 9, transport investment will be guided by metropolitan area transport strategies. However, in order to avoid the potentially negative consequences of interurban connectivity, appropriate planning and zoning can ensure that land use and transport are properly coordinated.

The Clonburris SDZ Planning Scheme is accompanied by a Transport Assessment & Transport Strategy which sets out a clear transport strategy within the development boundary. We refer the Board to Appendix 13.2 Traffic and Transportation Assessment of the enclosed Environmental Impact Assessment Report for further discussion of the consistency of the proposed development with the Clonburris SDZ Planning Scheme Transport Assessment & Transport Strategy.

9.5 Transport Strategy for the Greater Dublin Area 2022 - 2042

The Transport Strategy for the Greater Dublin Area 2022 – 2042 provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. The strategy is based on national policies on sustainability as set out in the climate action and low carbon legislation and in climate action plans.

It also provides a transport planning policy around which other agencies involved in land use planning, environmental protection and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential strategic component in the orderly, integrated development of the GDA over the next 20 years.

A number of key transportation proposals underpin the GDA Transport Strategy, including but not limited to:

- Dart + South West (currently under tender process for construction phase) this includes electrification of the Kildare Line from Dublin Heuston to Hazelhatch-Celbridge. Which will increase the frequency and efficiency of services at Kishoge Railway Station.
- Bus Connects – a ‘Core Bus Network’ for the region comprising: -
 - 16no. radial bus corridors.
 - 3no. orbital bus corridors.
 - 6no. regional bus corridors

We refer the Board to Appendix 13.2 Traffic and Transportation Assessment of the enclosed Environmental Impact Assessment Report for further discussion of the consistency of the proposed development with the Clonburris SDZ Planning Scheme Transport Assessment & Transport Strategy.

9.6 Section 28 Ministerial Guidelines

9.6.1 Compact Settlement Guidelines

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) set national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

The Guidelines replace the [Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities](#) 2009 (now revoked). They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

We note that Section 2.1.2 of the Compact Settlement Guidelines states: -

*In the case of a SDZ Planning Scheme, it is the intention of these Guidelines **that Section 170 (2) of the Act will continue to apply and supersede any contrary provisions** (including Specific Planning Policy Requirements) **contained in these Guidelines until the Planning Scheme is amended to integrate changes arising from the Guidelines**. This is to ensure that the consequences of the updated standards can be fully integrated into the planning schemes in due course without unintended consequences. In this regard, no permission shall be granted for any development that would not be consistent with the planning scheme.*

The approved Clonburris SDZ Planning Scheme prescribes the density and design parameters for the proposed development, which are not superseded by the Compact Settlement Guidelines' Specific Planning Policy Requirements (SPPRs).

We refer the Board to Sections 11 to 14 inclusive of this Report which demonstrate the consistency of the proposed development with the Clonburris SDZ Planning Scheme.

9.6.2 Sustainable Urban Housing: Design Standards for New Apartments (2023)

The Guidelines contain a number of 'Specific Planning Policy Requirements' (SPPR), which seek to implement the national and regional strategic planning policies and objectives identified in previous sections of this report.

Section 2.1.6 of the Clonburris SDZ Planning Scheme requires that: -

*"The design of apartment schemes shall also **accord with the aforementioned apartment guidelines and any superseding guidelines** in relation to housing mix, apartment type, minimum floor areas, design standards and internal facilities..."*

The proposed development is therefore assessed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments (2023) as follows: -

Apartment Mix (SPPR 1)

Specific Planning Policy Requirement 1 of the Apartment Guidelines, 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)."*

(SLA emphasis in bold)

Proposed Development

The proposed development offers a mix of 1-bed, 2-bed and 3-bed apartment units which include duplex and triplex typologies. There are no studio units proposed. The total number of 1-bed units amounts to 242no. or 26% of total number of apartments. Please see below unit mix breakdown: -

Site	1-Bed	2-Bed	3-Bed
Site 3	140	151	144
Site 4	65	177	53
Site 5	37	107	57
Total	242	435	254
%	26%	47%	27%

Table 9: Breakdown apartment unit mix

The proposed development is therefore compliant with SPPR 1 of these Guidelines.

The Planning Scheme does not prescribe a specific dwelling mix ratio for the SDZ development area, its Character Areas or sub-sectors, in order to facilitate market flexibility over the lifetime of the plan. However, we refer the Board to Section 10.3 of this Report which confirms that the overall unit mix proposed is in accordance with the South Dublin County Development Plan 2022-2028.

Flexibility of Unit Mix (SPPR 2)

Specific Planning Policy Requirement 2 of the Apartment Guidelines, states:

“For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: -

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development.”*

Proposed Development

On the basis that the proposed development exceeds 50no. apartment units on a site greater than 0.25 ha, SPPR2 is not applicable. We refer to the preceding section for confirmation of compliance with SPPR1.

Apartment Floor Area (SPPR 3)

Specific Planning Policy Requirement 3 requires that the following minimum floor areas are achieved for apartments: -

Minimum Apartment Floor Areas:-

<i>Studio Apartment (1 person)</i>	<i>37sqm</i>
<i>1-bedroom apartment (2 persons)</i>	<i>45sqm</i>
<i>2-bedroom apartment (3 persons)</i>	<i>63sqm</i>
<i>2-bedroom apartment (4 persons)</i>	<i>73sqm</i>
<i>3-bedroom apartment (5 persons)</i>	<i>90sqm</i>

Proposed Development

We can confirm that all of the proposed apartments exceed the minimum floor area requirements prescribed by SPPR3 of the Apartment Design Guidelines.

The **Housing Quality Assessment (HQA)**, prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for each of Sites 3, 4 & 5, enclosed with this application, confirms this to be the case.

Safeguarding Higher Standards

It is a policy requirement of the Guidelines that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the

relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

Proposed Development

The proposed apartment development within each of Sites 3, 4 & 5 does, however, exceed the minimum floor area requirement to safeguard higher residential amenity standards as recommended by the Apartment Guidelines.

The **Housing Quality Assessment** (HQA), prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for each of Sites 3, 4 & 5, enclosed with this application, confirms this.

Dual Aspect (SPPR 4)

Specific Planning Policy Requirement 4 states that

"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: -

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."

Proposed Development

Having regard to SPPR4 of the Apartment Guidelines, we would highlight that the application site may be categorised as a *more central and accessible urban locations*, due to the proximity to the Kishoge Commuter Rail Station (opened August 2024) and planned to accommodate the approved DART+South West upgrade service in due course. We can confirm that dual aspect units amount to 87% of the total number of apartment, duplex and triplex units proposed, in accordance with SPPR4.

The **Housing Quality Assessments** (HQA), prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for the proposed development, enclosed with this application, confirm this.

Floor to Ceiling Heights (SPPR 5)

Specific Planning Policy Requirement 5 states that:

"Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."

Proposed Development

However, having regard to SPPR5 of the Apartment Guidelines, we can confirm that the floor to ceiling heights of all of the proposed ground floor apartments meet or exceed the 2.7m minimum requirement.

The **Housing Quality Assessment (HQA)**, prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for each of Sites 3, 4 & 5, enclosed with this application, confirms this.

Units per Core (SPPR 6)

Specific Planning Policy Requirement 6 states that

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

Proposed Development

However, we can confirm that no more than 12 apartments per floor per core are accommodated in each apartment building in the proposed development, consistent with SPPR 6 of the Apartment Guidelines.

We refer the Board to the enclosed architectural floor plans prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects for the proposed apartment buildings in each of Sites 3, 4 & 5, which confirm this.

Private and Communal Open Space

The following are the minimum private and communal amenity space requirements of the Apartment Guidelines: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Table 10: Minimum private and communal amenity space requirements of the Guidelines

Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Table 11: Minimum private and communal amenity space requirements of the Guidelines

Proposed Development

We can confirm that Sites 3 and 5 meet the minimum requirements for both private and communal open space. We refer the Board to the enclosed Housing Quality Assessments (HQA) prepared by O'Mahony Pike Architects and McCauley Daye O'Connell Architects which confirm same.

In respect of Site 4, the minimum requirement for private open space is met. Communal open space for triplex and apartment units is also provided in accordance with the minimum standards. We note however, that the duplex typologies, of which there are 110no. units, are not provided with communal open space. This amounts to just 8.5% of the total number of units proposed across Site 3, 4 & 5. We therefore consider that this non-compliance is minor and not such as to amount to a material

contravention. We refer the Board to the enclosed Housing Quality Assessment, prepared by DTA Architects for further detail.

Sunlight & Daylight

Paragraph 6.6 of the Guidelines notes that: -

Planning authorities should avail of appropriate expert advice where necessary and have regard to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context, when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision.

We refer the Board to the accompanying **Daylight & Sunlight Analysis**, prepared by 3D Design Bureau.

In respect of the development at Site 3, the Report concludes: -

The assessment of APSH/WPSH demonstrated that 100% of the assessed windows meet the BRE Guidelines criteria.

*The **Sun On Ground assessment** of 27 neighbouring private gardens, that share boundaries with the subject site, showed that **all would experience a 'negligible' level of effect**. This excellent result demonstrates that the proposed development has been thoughtfully designed to respect the amenity of neighbouring residents, ensuring they will continue to enjoy good sunlight access to their private outdoor spaces.*

The scheme performance assessment has quantified the level of daylight and sunlight within the proposed development, focusing specifically on apartment and duplex units.

*The **SDA assessment revealed an excellent compliance rate of 99% under BR 209 criteria** both with and without trees. Notably, rooms affected by trees are only marginally below the threshold.*

*The **SE assessment of 435 units also demonstrated a 99% compliance rate with BRE Guidelines** criteria, both with and without trees. This high compliance rate demonstrates appropriate orientation and window placement throughout the development, ensuring most residents will enjoy ample sunlight access.*

*The **SOG assessment of 12 shared amenity spaces revealed that all meet or exceed the minimum criteria set by BRE. Guidelines** for sunlight on amenity areas. This performance ensures that future residents will enjoy multiple well-sunlit outdoor spaces throughout the year.*

Overall, the proposed development at Clonburris: Site 3 demonstrates a thoughtful approach to design, providing good daylight and sunlight access for future residents while maintaining appropriate relationships with surrounding properties and context.

Section 5.2.1 of the Site 3 Report outlines the compensatory design solutions provided for apartments that do not achieve the daylight provision targets as set out in the BRE Guidelines.

In respect of the development at Site 4, the Report concludes: -

*For the **Sun On Ground (SOG)** study, as explained in the analysis of results, the assessment revealed **no adverse impact on the granted linear park SD228/0003**. This demonstrates that if the linear park is built according to the granted project specifications, the proposed development's massing and separation distance from the neighbouring granted linear park SD228/0003 will be adequate to preserve sunlight access.*

*The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development, focusing specifically on apartment, triplex, and duplex units. Proposed houses have been included in the model but not assessed internally. **Achieving full compliance with Spatial Daylight Autonomy (SDA), considering both states -***

***with and without trees in the calculations** - is a testament to the design team's commitment, attention to detail, and careful consideration of daylight provision. Their close collaboration with 3DDB ensured optimal results within the assessed units. These results should be regarded as excellent, particularly for a scheme of this scale.*

*The same level of design diligence is evident in the **Sunlight Exposure (SE) calculations**, where the **scheme achieves c.98% compliance** in both states: without deciduous trees and with all trees included in the calculation.*

*In the **SOG analysis**, although one of the spaces is under performing future occupants will have access to all other amenity areas that are fully compliant with the BRE guidelines.*

In conclusion, it is 3DDB's opinion that the design of the proposed development has yielded very favourable results in both the impact assessment and scheme performance, demonstrating a thoughtful approach to daylight and sunlight access and provision.

In respect of the development at Site 5, the Report concludes: -

*The **SDA assessment of 632 habitable rooms across 201 units revealed an excellent compliance rate of 99% under BR 209 criteria when including trees, with only 5 no. rooms falling marginally short of the 50% threshold.** Furthermore, without trees included in the assessments, only one room is marginally below the threshold.*

*In the **SE study**, all 201 assessed units meet the BRE Guideline's criteria, both with and without deciduous trees.*

*The **SOG assessment revealed that the 3 planned public open spaces vastly exceed the criteria set by the BRE Guidelines.***

This excellent performance is a result of the collaborative approach between 3DDB and the design team to optimise the buildings layout and design for maximum daylight and sunlight access.

Overall, the proposed development at Clonburris: Site 5 demonstrates a considerate approach to design, providing good daylight and sunlight access for future residents while minimizing impact on surrounding existing and planned properties.

Section 5.2.1 of the Site 5 Report identifies the compensatory design solutions for the proposed apartments that do not achieve the daylight provision targets set out in the BRE Guidelines.

9.6.3 Urban Development and Building Heights, Guidelines for Planning Authorities (2018)

The Urban Development and Building Heights Guidelines (2018) were published by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended).

The Building Height Guidelines acknowledge that a key objective of the NPF is to promote an increase in prevailing building height and overall density, in order to achieve more compact urban growth. Increased building height and development density are not only to be facilitated, but actively sought out and brought forward by the planning processes.

The Guidelines therefore set out a number of Specific Planning Policy Requirements (SPPR) that Planning Authorities and An Bord Pleanála are required to have regard to in carrying out their functions.

Section 3.1 of the Guidelines sets out development management principles for the assessment of individual planning applications. It states that '*planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights*'.

Section 3.1 of the Guidelines requires Planning Authority to apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

In respect of the third bullet point quoted above from the Building Height Guidelines, we would highlight that the proposed development is subject of the prescribed design parameters, including building height, of the approved Clonburris SDZ Planning Scheme (2019). The Planning Scheme does not pre-date the Building Height Guidelines and as such its building height parameters are considered to be consistent with these Guidelines. We therefore refer the Board to Sections 11 to 14 inclusive of this Report which demonstrate the consistency of the proposed development with the Clonburris SDZ Planning Scheme, including building height.

The South Dublin County Development Plan 2022-2028 and Clonburris SDZ Planning Scheme 2019, currently in force, were prepared having regard to the Building Height Guidelines 2018. The proposed development is consistent with these statutory plans and therefore also with the Building Height Guidelines that informs these plans.

We can therefore also confirm that, consistent with the strategic recommendations of the Building Height Guidelines, the proposed development will assist in meeting National Strategic Objectives through the provision of a more compact urban form, with respect to building height and density, within the boundaries of the approved Clonburris SDZ Planning Scheme.

9.6.4 The Planning System and Flood Risk Assessment (2009)

These Guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

We refer the Board to the enclosed Flood Risk Assessments, prepared by DBFL Consulting Engineers, JBA Consulting and RPS Consulting Engineers for details. The conclusions of these Reports are outlined in Section 8.10 of this Report for ease of reference.

9.6.5 Design Manual for Urban Roads and Streets (2013)

The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant. It will lower traffic speeds, reduce unnecessary car use and create a built environment that promotes healthy lifestyles and responds more sympathetically to the distinctive nature of individual communities and places. The implementation of DMURS is intended to enhance how we travel to and from business; enhance how we interact with each other and have a positive impact on our enjoyment of the places to and through which we travel.

The Clonburris SDZ Planning Scheme (2019), and by extension the proposed development, is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The proposed development is reflective of an integrated design approach that seeks to implement a sustainable community, connected by well-designed streets, which deliver safe,

convenient and attractive connectivity networks, in accordance with the Transport Strategy and prescriptive Street Hierarchy of the Clonburris SDZ Planning Scheme.

We refer the Board to the enclosed road drawings prepared by DBFL Consulting Engineers, CS Consulting Engineers and RPS Consulting Engineers and Appendix 13.2, Traffic and Transportation Assessment, of the enclosed Environmental Impact Assessment Report for details.

9.6.6 Childcare Facilities, Guidelines for Planning Authorities (2001)

The Clonburris SDZ Planning Scheme seeks to “*facilitate the sustainable development of good quality and accessible early childhood care (early years and general childcare both home based and centre based) and education infrastructure*”. It is further stated that “*the Scheme supports the co-location of purpose built childcare facilities with primary schools and supports the provision of purpose built childcare facilities adjacent to existing or planned primary schools. Early childhood care in residential units should only be provided at an appropriate scale to complement purpose built facilities and are subject to appropriate safeguards. Childcare facilities should be within walking and cycling distance of educational, community facilities and employment locations*”.

The Planning Scheme is not prescriptive in respect of the quantum of childcare spaces that should be provided at any given site. The Applicant has therefore had regard to the Childcare Facilities: Guidelines for Planning Authorities (2001).

Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland.

The Guidelines recommend childcare provision on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a new residential scheme. The Design Standards for New Apartments: Guidelines for Planning Authorities published in 2018 (updated in 2023) provides further clarification with regards to childcare provision:

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

The proposed development accommodates a total of 1,252no. dwellings, including 242no. 1-bed units, 435no. 2-bed units, 567no. 3-bed units and 8no. 4-bed units in a mix of houses, triplexes, duplexes and apartments.

Having regard to the provisions of Section 4.7 of the Childcare Guidelines, arguably 1-bed and 2-bed apartment units (677no.) can be discounted from the calculation of childcare space quantum requirements. Thereafter, a total 575no. 3-bed and 4-bed dwellings are proposed. This gives rise to a requirement for 153no. childcare spaces.

The proposed development provides 2no. childcare facilities with a capacity of c. 200no. childcare spaces, 1no. located in Site 3 (c. 553sqm) which caters for c. 100no. children and 1no. located in Site 4 (c. 544sqm) which also caters for c. 100no. children.

The proposed childcare facility at Site 3 is in close proximity to the existing Lucan East Educate Together National School to the north. While the proposed childcare facility at Site 4 is located within the vicinity of the ‘Grange Local Node’ indicated by the Planning Scheme. The locations of both childcare facilities have been carefully considered and have had due regard to the provisions made in the Planning Scheme.

10 STATEMENT OF CONSISTENCY- SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

The South Dublin County Development Plan 2022-2028, which came into effect on August 2022, is the statutory plan for the area and guides new development throughout the South Dublin County.

It may be noted that the approved Clonburris SDZ Planning Scheme forms part of the County Development Plan. The consistency of the proposed development is discussed further in Sections 11 to 14 inclusive of this Report, below.

10.1 Core Strategy and Settlement Strategy

Policy CS7 'Consolidation Areas within the Dublin City and Suburbs Settlement' seeks to: -

Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

Section 2.7.1 of the Core Strategy identifies that the 'Key Urban Centres within Dublin City and Suburbs' includes the County's Strategic Development Zones (SDZ).

Table 9 of the Core Strategy relating to 'Capacity of undeveloped lands within South Dublin' confirms that Clondalkin, **Clonburris** and Grange Castle collectively have the potential to deliver 5,099no. dwellings.

CS7 Objective 4 seeks: -

*To promote and facilitate development at the **Strategic Development Zones** at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs.*

In respect of the Clonburris SDZ, the Core Strategy states that: -

"Lands at Clonburris have an approved SDZ Planning Scheme (2019) and represent a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor. The Council will continue to actively promote the delivery of sufficient public transport and road capacity, in tandem with future development of the SDZ. In this regard, significant funding has been achieved through the URDF to provide infrastructure to facilitate early development during the lifetime of the Development Plan."

The Core Strategy states that it remains a priority of the Council that the delivery of planned compact growth at Clonburris SDZ will continue to be supported by investment in and delivery of sufficient public infrastructure.

It is submitted that the proposed development makes a significant, positive contribution to the delivery of quality housing by South Dublin County Council within the Clonburris SDZ development boundary, in a manner that is consistent with the approved Clonburris SDZ Planning Scheme and the Core Strategy of the County Development Plan.

10.2 Land-Use Zoning

The lands subject of this Part 10 planning application to the Board are zoned objective SDZ "to provide for strategic development in accordance with approved planning schemes"

The Clonburris SDZ Planning Scheme was approved by An Bord Pleanála in 2019. It contains the relevant fixed development objectives and design parameters which the proposed development shall be consistent with. We refer the Board to Sections 11 to 14 inclusive, below, for discussion on the consistency of the proposed development (Sites 3, 4 & 5) with the Clonburris SDZ Planning Scheme.

It may be noted that a portion of the Site 5 lands (i.e. eastern portion of 5B) extends beyond the Clonburris SDZ Planning Scheme boundary, to lands zoned Objective RES in the South Dublin County Development Plan that seek "to protect and/or improve residential amenity". We can confirm that the proposed development at Site 5b is consistent with this land use zoning objective. We refer the Board

to the enclosed Planning Report and Statement of Consistency, prepared by McCutcheon Halley Chartered Planning Consultants for further details in respect of the consistency of the proposed development at Site 5B with the land use objective RES.

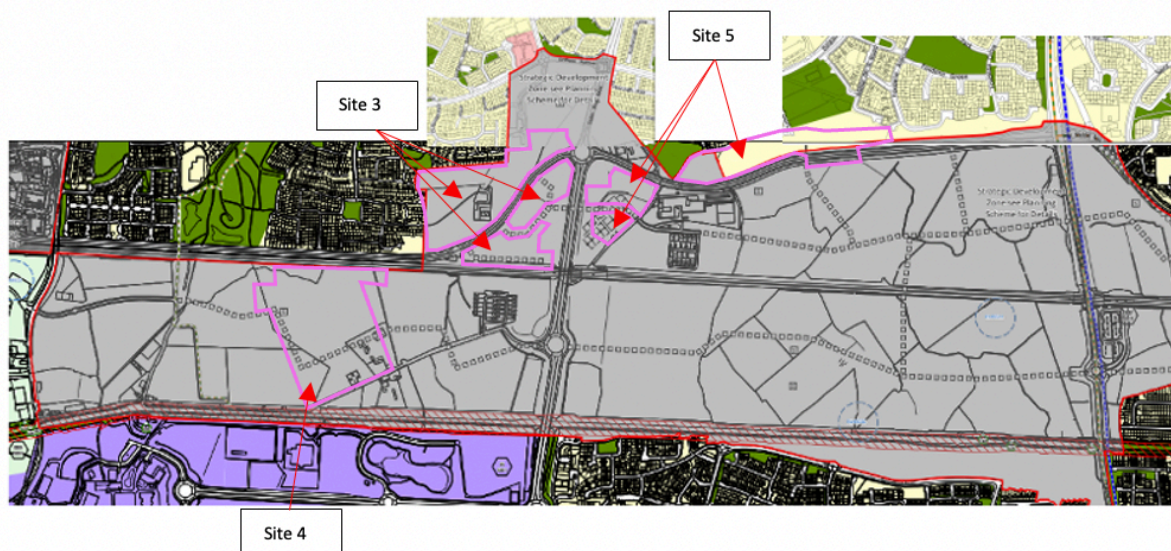


Figure 16: Extract from South Dublin County Development Plan 2022-2028 Land Use Zoning Map (SLA overlay of site location in pink).

We refer the Board otherwise to Sections 11 to 14 inclusive, below, for discussion on the consistency of the proposed development (Sites 3, 4 & 5) with the Clonburris SDZ Planning Scheme.

10.3 Unit Mix

H1 Objective 12 states that: -

*“Proposals for residential development shall provide a **minimum of 30% 3-bedroom units, a lesser provision may be acceptable** where it can be demonstrated that:*

- *there are unique site constraints that would mitigate against such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme”*

The proposed development comprises 45% (567no.) 3-bed units and is therefore compliant with H1 Objective 12. A breakdown of the unit mix proposed is provided below: -

Unit Mix	Site 3	Site 4	Site 5	Total	% Mix
1-Bed	140	65	37	242	19%
2-Bed	151	177	107	435	35%
3-Bed	289	186	92	567	45%
4-Bed	-	8	-	8	1%
Total	580	436	236	1,252	100%

Table 12: Proposed Unit Mix

10.4 Bicycle Parking

Section 12.7.1 of the Development Plan sets out bicycle parking/ storage requirements for all new development in the County.

Bicycle parking / storage rates are divided into two main categories: -

- *Long Term: These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.*
- *Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.*

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 bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-

Figure 17: Extract from Table 12.23 of the South Dublin County Development Plan 2022-2028

In the first instance, we refer the Board to Section 4.3.2 of Appendix 13.2 of the enclosed Environmental Impact Assessment Report which outlines the bicycle parking requirements and provision proposed.

At Site 3, the scheme is required to provide at least 1105 no. cycle parking spaces comprising a minimum of 877 no. long stay and 228 no. short stay spaces. The development proposes to accommodate a total of 1116 no. cycle spaces. This provision includes 882 no. long stay and 234 no. short stay visitor parking spaces, in accordance with the Development Plan Standards.

Unit Type		No. of Units / GFA (m2) / No. of Staff	No. of Beds	SDCC Standard		SDCC Req.	
				Long-Stay	Short-Stay	Long-Stay	Short-Stay
Apartments/ Duplex	1-bed	140	140	1 per Bed	1 per 2 Units	140	70
	2-bed	151	302			302	76
	3+-bed	144	432			432	72
Houses	3+-bed	145	435	-	-	-	-
Crèche		553 m2 (6 classrooms)	-	1 per 5 staff	1 per 10 children	3	10
Sub-Total Cycle Parking Per Requirement						877	228
Total Cycle Parking Per Requirement						1105	

Figure 18: Extract from Table 4-7 of Appendix 13.2 of the enclosed Environmental Impact Assessment Report

At Site 4, the scheme is required to provide at least 755 no. cycle parking spaces comprising a minimum of 588 no. long stay and 167 no. short stay spaces. The development proposes to accommodate a total of 793 no. cycle spaces, including 591no. long stay and 202 no. short stay spaces, in accordance with the Development Plan Standards.

Unit Type		No. of Units / GFA (m2) / No. of Staff	No. of Beds	SDCC Standard		SDCC Req.	
				Long-Stay	Short-Stay	Long-Stay	Short-Stay
Apartments/ Duplex	1-bed	65	65	1 per Bed	1 per 2 Units	65	33
	2-bed	177	354			354	89
	3+-bed	53	159			159	27
Houses	3+-bed	141	423	-	-	-	-
Crèche		20 staff & 90 children	-	1 per 5 staff	1 per 10 children	4	9
Retail		6 staff (150 m2)	-	1 per 5 staff	1 per 150 m2	1	1
Employment		200 m2	-	1 per 200 m2	1 per 200 m2	1	1
Community		20 staff (683 m2)	-	1 per 5 staff	1 per 100 m2	4	7
Sub-Total Cycle Parking Per Requirement						588	167
Total Cycle Parking Per Requirement						755	

Figure 19: Extract from Table 4-8 of Appendix 13.2 of the enclosed Environmental Impact Assessment Report

At Site 5, the scheme is required to provide at least 577 no. cycle parking spaces comprising a minimum of 422 no. long stay and 155 no. short stay spaces. The development proposes to accommodate a total of 628 no. cycle spaces, including 527no. long stay and 101 no. short stay spaces, in accordance with the Development Plan Standards.

Unit Type		No. of Units / GFA (m2) / No. of Staff	No. of Beds	SDCC Standard		SDCC Req.	
				Long-Stay	Short-Stay	Long-Stay	Short-Stay
Apartments/ Duplex	1-bed	37	37	1 per Bed	1 per 2 Units	37	19
	2-bed	107	214			214	107
	3+-bed	57	171			171	29
Houses	3+-bed	35	105	-	-	-	-
Sub-Total Cycle Parking Per Requirement						422	155
Total Cycle Parking Per Requirement						577	

Figure 20: Extract from Table 4-8 of Appendix 13.2 of the enclosed Environmental Impact Assessment Report

10.5 Car Parking

Section 12.7.4 of the County Development Plan outlines car parking standards for new developments. The proposed development is located within Zone 2.

Table 12.26 of the Development Plan outlines maximum parking rates for residential development while 12.25 outlines maximum parking rates for non-residential development. Extracts of these tables are provided below for ease of reference: -

Education	College of Higher Education	1 per staff plus 1 per 15 students	1 per 2 staff plus 1 per 30 students
	Crèche School ⁹	1 per classroom	0.5 per classroom
Retail and Retail Service	Café Restaurant	1 per 15 sq m GFA	1 per 20 sq m GFA
	Bar Club ¹⁰	1 per 30 sq m	1 per 40 sq m
	Retail Convenience	1 per 15 sq m	1 per 25 sq m
	Retail Comparison	1 per 25 sq m	1 per 35 sq m
	Retail Warehousing	1 per 50 sq m	1 per 50 sq m
	Vehicle Service Station	1 per 250 sq m GFA	1 per 250 sq m GFA
Enterprise and Employment	Offices ¹¹	1 per 50 sq m GFA	1 per 75 sq m GFA
	Warehousing	1 per 100 sq m GFA	1 per 200 sq m GFA
Civic, Community and Religious	Bank Community Centre Library Public Institution	1 per 25 sq m GFA	1 per 50 sq m Gross Floor Area (GFA)
	Place of Worship	1 per 6 seats	1 per 12 seats
	Funeral Home	1 per 20 sq m GFA	1 per 20 sq m GFA

Figure 21: Extract from Table 12.25 of the South Dublin County Development Plan 2022-2028

Table 12.26: Maximum Parking Rates (Residential Development)

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Figure 22: Extract from Table 12.26 of the South Dublin County Development Plan 2022-2028

At Site 3, the maximum quantum of car parking spaces for residential development is 657no. spaces while the maximum quantum for the creche use is 3no. spaces. It is therefore proposed to provide

456no. spaces, including 23no. accessible spaces and 3no. creche spaces, in accordance with the Development Plan requirements.

At Site 4, the maximum quantum of car parking spaces for residential development is 505no. spaces while the maximum quantum for the non-residential uses is 33no. spaces. It is therefore proposed to provide 408no. surface car parking spaces including 8no. creche spaces, 5no. retail spaces, 2no. employment spaces and 9no. community spaces.

At Site 5, the maximum quantum of car parking spaces for residential development is 259no. spaces. It is therefore proposed to provide 219no. spaces, in accordance with the Development Plan requirements.

We refer the Board to Section 4.3.1 of Appendix 13.2 of the enclosed Environmental Impact Assessment Report for further details.

10.5.1 EV Parking

Section 12.7.5 of the Development Plan outlines the requirements for electric vehicles and associated infrastructure stating that: -

EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas.

The remainder of the parking spaces should be constructed to be capable of accommodating future charging points.

In accordance with Section 12.7.5, 20% of the total car parking spaces will be allocated as electric vehicle charging stations while the remainder of the parking spaces will be constructed to be capable of accommodating future charging points, as required. A breakdown of EV parking spaces per site is provided below: -

- Site 3: 122no. spaces
- Site 4: 134no. spaces
- Site 5: 18no. spaces

The Applicant acknowledges that Section 2.2.6 of the Clonburris SDZ Planning Scheme states: -

To facilitate the use of electrically operated cars and bicycles, all developments should provide charging points for the charging of electric vehicles at a rate of 100% of the car parking provision and 10% of the bicycle parking provision.

While it is proposed to provide EV charging facilities for 20% of the total car parking spaces, it is also proposed to provide the necessary ducting required to all car parking space to accommodate future charging points. This will allow the proposed development to achieve 100% EV parking spaces in the future. This approach has been adopted by SDCC in recent applications in the Planning Scheme area including SDZ24A/0033W, SDZ23A/0004 and SDZ23A/0018.

11 CLONBURRIS SDZ PLANNING SCHEME 2019

11.1 Land Use

The application site (including Sites 3, 4 & 5) is predominately designated for 'Primarily Residential' use under the Planning Scheme. The application site also includes lands designated as 'Open Space Areas' in each of Sites 3, 4 and 5. Site 3 and Site 5 include lands designated as 'Mixed Use' (retail, commercial and residential) areas within the Kishoge Urban Centre. The Planning Scheme also makes provision for some non-residential uses in Site 4.

We refer the Board further to Sections 12 to 14 inclusive, below, for the Statements of Consistency with the Clonburris SDZ Planning Scheme prepared for each of Site 3, Site 4 and Site 5, for greater detail on the range of residential and non-residential uses that are to be accommodated within each of Sites 3, 4 and 5 and their associated 'sub-sectors'.

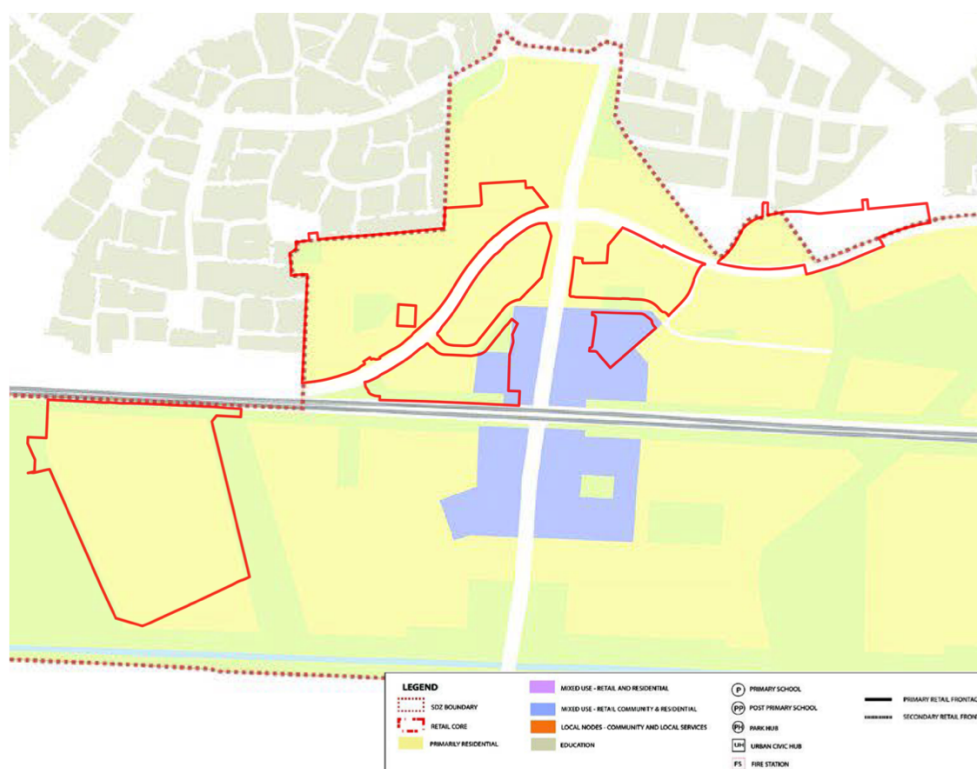


Figure 23: Land Use Area Map of the Clonburris Planning Scheme, with Sites 3, 4 and 5 highlighted indicatively in red (Overlay by SLA).

11.2 Clonburris SDZ Vision

Section 1.2 of the Clonburris SDZ Planning Scheme outlines the Strategic Development Zone Vision- 'A vibrant community offering a new way of living'.

The proposed development has been carefully designed and considered in order to achieve an exemplar new plan-led community integrated into the wider SDZ, providing: -

- Delivery of sustainable quantum and choice of high quality homes in compact settlements.
- Delivery of and/or access to a good range of local services and amenities, including non-residential development, Urban Centre, parks (canal corridor, rail corridor and linear parks) and open spaces.
- Ease of access and sustainable connectivity for pedestrians and cyclists to local amenities and services via a high quality public realm, and to the wider area by convenient public transport and careful road design.

- Sustainable community development, supported by green infrastructure, sustainable urban drainage and energy and climate change design mitigation.
- Delivery of public infrastructure, in accordance with the SDZ Phasing Strategy.

We refer the Board to the following plans and particulars accompanying this application which illustrate these settlement design aspects further, in the context of the Clonburris SDZ Planning Scheme: -

- Site 3 Design Statement, prepared by O'Mahony Pike Architects
- Site 4 Design Statement, prepared by DTA Architects
- Site 5 Design Statement, prepared by McCauley Daye O'Connell Architects
- Appendix 13.2 "Traffic & Transport Assessment of the enclosed Environmental Impact Assessment Report.
- Site 3 Infrastructure Design Report, prepared by DBFL Consulting Engineers
- Site 4 Engineering Services Report, prepared by CS Consulting Engineers
- Site 5 Infrastructure Design Report, prepared by RPS Group
- Site 3 Landscape Particulars, prepared by Doyle O'Troithigh Landscape Architects
- Site 4 Landscape Particulars, prepared by Bernard Seymour Landscape Architects
- Site 5 Landscape Particulars, prepared by LDA Design

11.3 Overarching Principles

Section 1.3 of the Conburris SDZ Planning Scheme outlines 19no. overarching principles of the Planning Scheme. In accordance with Section 1.3, the proposed development will contribute to creating a multi-faceted new community in South Dublin County offering a broad range of housing typologies and non-residential uses including childcare facilities, retail uses and community uses as well as the provision of green, drainage and road infrastructure as required by the Planning Scheme.

We refer the Board to the enclosed Architectural Design Statements, prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects, which outline the design and placemaking approach taken in accordance with the provisions of the approved Planning Scheme.

It is acknowledged that the Planning Scheme has been subject to Strategic Environmental Assessment, the accompanying Environmental Impact Assessment has regard to same.

The proposed development includes the refurbishment of Grange House, identified as a heritage structure of local interest in the Planning Scheme. While not a Protected Structure, the proposal to reuse Grange House for future employment use will have due regard to the heritage value of the building. This application seeks permission for the employment use and the detail of any associated refurbishment or conservation work required to accommodate an end user may be subject of separate future planning application. The proposal seeks to incorporate the active use of Grange House into the community. The proposal includes the incorporation of public space around the curtilage of the building for enjoyment by the local community. We refer the Board to Chapter 16 "Archaeological and Architectural Heritage" of the enclosed Environmental Impact Assessment Report and the Site 4 Architectural Design Statement, prepared by DTA Architects for further detail.

The proposed development has been carefully considered to provide an integrated network of streets and routes with a clear hierarchy to promote active travel, primarily walking and cycling, in accordance with the provisions of the Planning Scheme and DMURS. We refer the Board to the Statements of Consistency for each of Sites 3, 4 & 5, contained in Sections 12-14 of this Report. We refer also to Appendix 13.2 "Traffic & Transport Assessment of the enclosed Environmental Impact Assessment Report which outlines compliance with the Planning Scheme in respect of same.

The landscape proposals have had due regard to the existing biodiversity and landscape assets within the SDZ. The proposals for the Application Site (Sites 3, 4 & 5) seek to provide attractive, interesting

and usable outdoor spaces, as well as maximising access to the Grand Canal and Griffeen Valley Park. We refer the Board to the enclosed landscape plans and particulars, prepared by Doyle O'Troithigh Landscape Architects, Bernard Seymour Landscape Architects and LDA Design which provide further detail.

We refer the Board to Sections 12-14 of this Report which further detail consistency with the Planning Scheme on a site by site basis.

11.4 Planning Scheme Framework

Section 2 of the Clonburris SDZ Planning Scheme outlines the overarching framework for development in the area, namely: -

Land Use and Density: We refer the Board to Sections 12-14 of this Report, which demonstrates that the proposed development is consistent with the Planning Scheme in respect of land use and density on a site by site basis.

Movement and Transport: We refer the Board to Chapter 13 of the enclosed Environmental Impact Assessment and its associated appendices, which demonstrate compliance with the Planning Scheme in respect of movement and transport.

Blue and Green Infrastructure: We refer the Board to the enclosed landscape plans and particulars prepared by Doyle O'Troithigh Landscape Architects, Bernard Seymour Landscape Architects and LDA Design, which demonstrate compliance with the Planning Scheme in respect of blue and green infrastructure. Additionally, we refer the Board to the site by site Infrastructure Design Reports, prepared by DBFL Consulting Engineers, CS Consulting Engineers and RPS Group. Furthermore, we refer the Board to the enclosed Flood Risk Assessments, prepared by DBFL Consulting Engineers, JBA Consulting and RPS Group.

Urban Centres: A small portion of Site 3 and Site 5 is located within Development Area 6- Kishoge Urban Centre. We refer the Board to Section 12 and 14 of this Report which demonstrates consistency with the Planning Scheme in respect of the Kishoge Urban Centre provisions.

Retail: Retail development is proposed at Site 4, within the Kishoge South West Development Area, fronting Griffeen Valley Park. We refer the Board to Section 13 of this Report, which demonstrates consistency of the Site 4 proposals with the Planning Scheme in respect of the provision of retail and other non-residential development.

Community Facilities and Public Services: Non-retail development is provided within Sites 3 and 4. This includes community uses, childcare facilities and commercial uses. We refer the Board to Sections 12 & 13 of this Report, which provides further detail in the context of the Planning Scheme.

Built Form and Design: The proposed development has been designed in accordance with the design parameters and Section 2.8 of the Planning Scheme, in respect of built form and design. We refer the Board to the enclosed Architectural Design Statements, prepared by O'Mahony Pike Architects, DTA Architects and McCauley Daye O'Connell Architects and to Sections 12-14 of this Report (inclusive) for further details.

Services, Infrastructure and Energy Framework: We refer the Board to Chapters 10 'Air Quality', 11 'Climate Change' and 15 'Material Assets- Utilities' of the enclosed Environmental Impact Assessment Report. Additionally, we refer the Board to the site by site Energy Statements, prepared by MANDE Consulting Engineers, Metec Consulting Engineers and OCSC Consulting Engineers.

Landscape and Open Space: We refer the Board to the enclosed landscape plans and particulars prepared by Doyle O'Troithigh Landscape Architects, Bernard Seymour Landscape Architects and LDA Design, which demonstrate compliance with the Planning Scheme in respect of landscape and open space. Additionally, we refer the Board to Chapter 12 'Landscape and Visual Impact' of the enclosed Environmental Impact Assessment Report.

Biodiversity and Natural Heritage: We refer the Board to Chapter 6 of the enclosed Environmental Impact Assessment Report, which considers the impact of the proposed development on biodiversity.

Furthermore, we refer the Board to the enclosed Appropriate Assessment Screening Report, prepared by Minogue & Associates Ecological Consultants.

Archaeological and Architectural Heritage: We refer the Board to Chapter 16 of the enclosed Environmental Impact Assessment Report, which considers the impact of the proposed development on cultural heritage, both archaeological and architectural.

11.5 Kishoge Character Area

The proposed development is located within the Kishoge Character Area. The proposed development is centred around the existing public transport infrastructure at Kishoge Railway Station to provide a new residential community with supporting community and non-residential services in accordance with the Planning Scheme requirements.

For details of the proposed development in accordance with the key principles and design parameters of the Planning Scheme, we refer the Board to the site-by-site Statements of Consistency detailed in Section 12-14 (inclusive) of this Report.

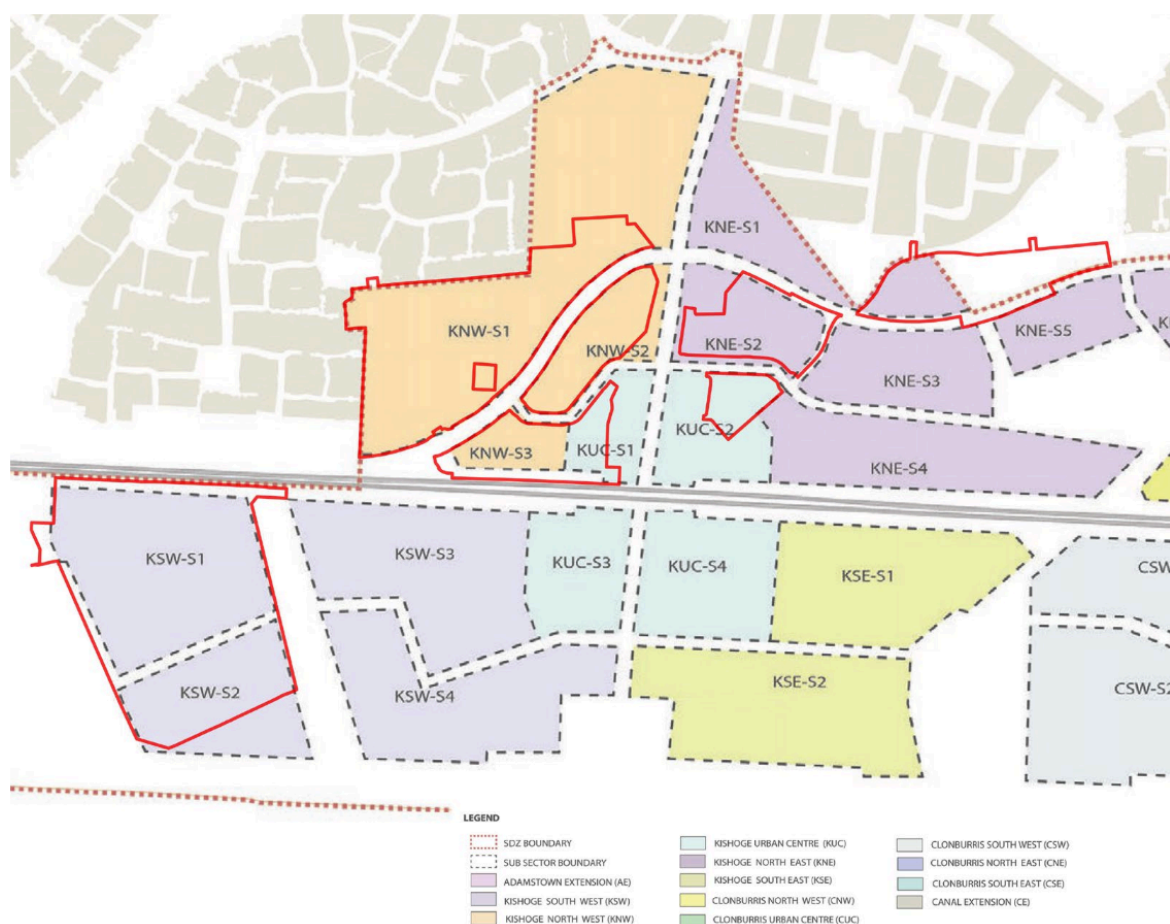


Figure 24: Extract from figure 2.1.4 of the Clonburris SDZ Planning Scheme, site boundaries indicated in red.

11.6 Social and Affordable Housing

Section 2.1.6 of the Planning Scheme addresses social housing, stating that: -

"All development shall comply with the requirements of Part V of the Planning and Development Act, 2000 - 2016 (as amended) and with the South Dublin County Council Housing Strategy with regard to the provision of Social and Affordable Housing (if further amended)".

In accordance with the above, it is South Dublin County Council's strategy to provide only social and affordable housing on their lands. Social units account for 33% of the allocation while affordable units account for 67%.

We refer the Board to Section 1.6 of the enclosed Architectural Design Statement, prepared by O'Mahony Pike Architects for further details relating to social and affordable housing.

11.7 Phasing

The proposed development is being delivered in accordance with the phasing requirements outlined in Table 4.3 of the Planning Scheme.

Minimum Delivery in Phase	Status
Prior to commencement of Development	
Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.	This has been prepared and subsequently approved by SDCC.
Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.	This has been prepared and subsequently approved by SDCC.
Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council.	This has been prepared and subsequently approved by SDCC.
Phase 1A (0 – 1,000 residential units constructed and occupied)	
Retail Core development in accordance with the Place Making Requirements.	The proposed development does not include lands within the Clonburris or Kishoge Retail Core Areas as identified in Section 4.4 – Place Making of the Clonburris Planning Scheme. Reg. Ref. SDZ23A/0043 included c. 2,502sqm of retail use within the Kishoge Retail Core Area.
Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station & completion of the realignment of Lock Road (R120).	Kishoge Train Station is now fully operational and open to the public. The Lock Road (R120) does not traverse the Application Site.
Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC.	Refer to Irish Water Confirmation of Feasibility accompanying this planning application.
The planning of works for the provision of community floor space and the availability of childcare spaces.	The proposed development has been designed in accordance with the 'Community' space requirement for each of the Development Areas subject to this planning application. 2no. childcare buildings (in Site 3 and Site 4), cumulatively totalling c. 1,097sqm, are proposed

	as part of this application to cater for the estimated childcare demand arising from the overall proposed development. A Community space is also proposed in Site 4. This is in accordance with the provisions of the Planning Scheme.
Phase 1B (1,001 – 2,000 residential units constructed and occupied)	
Planning permission for appropriate elements of Clonburris Retail Core, including retail provision, employment, residential, community floorspace and urban hub.	The proposed development does not include lands within the Clonburris Retail Core Areas as identified in Section 4.4 – Place Making of the Clonburris Planning Scheme.
Planning permission for Kishoge Retail Core, including retail provision, employment, community floorspace and residential.	Permitted SDZ23A/0043 includes part of Kishoge Urban Centre, relating to Kishoge Retail Core, and provides the required land uses to satisfy this requirement
Planning and commencement of works at Griffeen Valley Park Extension or Na Cluainte (North and South) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.	The Strategic Parks and Landscape Strategy has been approved which provides the framework for the Griffen Valley Park Extension and the Na Cluainte North and South parks.
Agree and make available a school site to the Department of Education (in accordance with requirement of the Department of Education and SDCC).	Existing and permitted school facilities are situated immediately north of the Site 3, within sub sector KNW-S1. An undeveloped site immediately north of proposed Cluster F in Site 4 is designated for a school site. This will be subject of a separate planning application by the Department of Education. An existing Post Primary School (Griffen Community College) is in proximity to Site 5, with a site for a Primary School as identified in the Planning Scheme further east.
Provision of a minimum 1,000 sqm net convenience floorspace and 500 sqm net comparison/ retail services floorspace (As part of the Place Making Requirements for delivery of Kishoge).	Permitted SDZ23A/0043 includes part of Kishoge Urban Centre, relating to Kishoge Retail Core, and provides the required land uses to satisfy this requirement. Retail and employment floor area is proposed in Site 4, in accordance with the provisions of the Planning Scheme.
Provision of a minimum of 500 sqm of community services floorspace (e.g. childcare or health centre) (At Kishoge or Clonburris – subject to location of residential units constructed).	Site 4 includes c. 683sqm of community floorspace through the provision of a community pavilion building fronting Griffeen Valley Park area, in accordance with the provisions of the Planning Scheme.
Design and planning permission for District Park Hub at Clonburris Little.	The proposed development does not include lands at Clonburris Little.
Planning and commencement of Link Streets with associated undergrounded services in Development Areas where construction of residential units commences or commenced in Phase 1 (A or B).	Clonburris Northern Link Street (NLS) and associated services permitted under Reg. Ref. SDZ24A/0033W. Traverses Sites 3 and 5. Clonburris Southern Link Street (SLS) and associated services permitted under Reg. Ref.

	SDZ20A/0021 is currently being delivered. Traverses Site 4.
Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3.	<p>The proposed development includes for the provision of 2no. childcare buildings, cumulatively totalling c. 1,097sqm, to cater for the childcare requirements of the proposed development.</p> <p>We refer to Section 9.6.6 of the Planning Application Report prepared by Stephen Little & Associates for further details on childcare provision for the proposed development.</p>
District and catchment level measures from an agreed Surface Water Management Plan to accommodate construction within the subject development areas of construction.	DBFL Consulting Engineers have undertaken a "Surface Water Management Plan" (SWMP) for the overall Clonburris Strategic Development Zone (SDZ). The SWMP for the SDZ been submitted to and agreed with SDCC.
Retail Core development in accordance with the Place Making Requirements.	<p>The proposed development does not include lands within the Clonburris or Kishoge Retail Core Areas as identified in Section 4.4 – Place Making of the Clonburris Planning Scheme.</p> <p>Reg. Ref. SDZ23A/0043 included c. 2,502sqm of retail use within the Kishoge Retail Core Area.</p>
Development shall accord with Local Infrastructure Requirements in relation to opening of Kishoge Railway Station.	Kishoge Railway Station opened in 2023 and is operational.
Provision of Water and Wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.	Refer to Irish Water Confirmation of Feasibility accompanying this planning application.
Phase 2 (2,001 – 4,000 residential units constructed and occupied)	
Provision of District Park Hub at Clonburris Little.	The proposed development does not include lands at Clonburris Little.
Completion of Link Streets and associated junctions with associated undergrounded in development areas where residential units are constructed (includes bridges where relevant).	<p>Clonburris Northern Link Street (NLS) and associated services permitted under Reg. Ref. SDZ24A/0033W. Traverses Sites 3 and 5.</p> <p>Clonburris Southern Link Street (SLS) and associated services permitted under Reg. Ref. SDZ20A/0021 is currently being delivered. Traverses Site 4.</p>
Planning and commencement of works to Griffen or Na Cluainte (alternate option to park commenced in Phase 1B) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.	The Strategic Parks and Landscape Strategy has been approved, which provides the framework for the Griffen Valley Park Extension and the Na Cluainte North and South parks. The Applicant can provide further detail prior to occupation.
Completion of works to Park commenced in Phase 1B at Griffen or Na Cluainte.	As above.
Agree and make available sites to the Department of Education for Schools (in accordance with requirement of the Department of Education and SDCC).	Existing and permitted school facilities are situated immediately north of Site 3, within sub sector KNW-S1.

	<p>An undeveloped site immediately north of proposed Cluster F in Site 4 is designated for a school site. This will be subject of a separate planning application by the Department of Education.</p> <p>An existing Post Primary School (Griffen Community College) is in proximity to Site 5, with a site for a Primary School as identified in the Planning Scheme further east.</p>
Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3 including the delivery of a minimum of one purpose built facility in Kishoge or Clonburris Urban Centre.	<p>The proposed development includes for the provision of 2no. childcare buildings, cumulatively totalling c. 1,097sqm, to cater for the childcare requirements of the proposed development.</p> <p>We refer to Section 9.6.6 of the Planning Application Report prepared by Stephen Little & Associates for further details on childcare provision for the proposed development.</p>
Provision of strategic pedestrian/cycle links (including bridges) in development areas where residential units are constructed.	The proposed development has been designed in accordance with the Overall Concept Movement strategy of the Planning Scheme.
District and catchment level measures from the Surface Water Management Plan to accommodate construction within the subject development areas.	DBFL Consulting Engineers have undertaken a "Surface Water Management Plan" (SWMP) for the overall Clonburris Strategic Development Zone (SDZ). The SWMP for the SDZ been submitted to and agreed with SDCC.
Retail Core development in accordance with the Place Making Requirements.	<p>The proposed development does not include lands within the Clonburris or Kishoge Retail Core Areas as identified in Section 4.4 – Place Making of the Clonburris Planning Scheme.</p> <p>Reg. Ref. SDZ23A/0043 included c. 2,502sqm of retail use within the Kishoge Retail Core Area.</p>
Provision of Water and Wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.	Refer to Irish Water Confirmation of Feasibility accompanying this planning application.

Table 13: Clonburris SDZ Planning Scheme Phasing Status

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1 SITE 3 - STATEMENT OF CONSISTENCY

This section provides a planning consistency review of the proposed development at the Site 3 of the Application Site, primarily against the relevant development objectives and standards of the Clonburris Strategic Development Zone (SDZ) Planning Scheme 2019.

However, we commence with a short review of the South Dublin County Development Plan 2022-2028, for strategic planning policy context and also, to identify relevant development plan standards, where there is no equivalent standard contained in the Clonburris SDZ Planning Scheme.

Where applicable, we will refer to relevant Section 28 Ministerial Guidelines. However, we acknowledge that the objectives or Specific Planning Policy Requirements (SPPRs) of Ministerial Guidelines do not supersede the objectives or development standards contained in the adopted Clonburris SDZ Planning Scheme, unless it has been subject of Variation to take such SPPRs into account.

2 SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028

The application site is located within the designated Clonburris Strategic Development Zone. Section 169(9) of the Planning & Development Act 2000, as amended ("the Act") reads as follows: -

"A Planning scheme made under this section shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded."

As such, the Clonburris SDZ Planning Scheme 2019 is the principal planning document of relevance to the planning assessment of the site. We refer to Section 3 of this planning report, below, which examines the consistency of the proposed development at SITE 3 with the Clonburris SDZ Planning Scheme.

Any relevant, complementary objectives or standards contained in the Development Plan applicable within the SDZ, are discussed in the section below.

2.1 Core Strategy and Settlement Strategy

Under the Core Strategy of the County Development Plan, the lands at Clonburris are subject of an approved SDZ Planning Scheme (2019). The Clonburris SDZ Planning Scheme area will accommodate a major residential-led expansion of Clondalkin to the west, along the Dublin-Cork rail corridor.

CS Objective 4 states: -

"To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs."

Section 2.7.1 of the Core Strategy states: -

"Lands at Clonburris have an approved SDZ Planning Scheme (2019) and represent a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor. The Council will continue to actively promote the delivery of sufficient public transport and road capacity, in tandem with future development of the SDZ. In this regard, significant funding has been achieved through the URDF to provide infrastructure to facilitate early development during the lifetime of the Development Plan."

The Core Strategy identifies that the delivery of planned compact growth and development is a priority for the Council.

The proposed development at Site 3 is consistent with the delivery of the strategic expansion of new residential-led development to the west of Clondalkin, along the Dublin-Cork rail corridor, within the Clonburris SDZ Planning Scheme area.

2.2 Land Use Zoning

The Site 3 site is zoned 'SDZ' in the County Development Plan. As noted, it forms part of the designated Clonburris Strategic Development Zone (SDZ), with the objective:

"To provide for strategic development in accordance with approved planning schemes."

The approved Clonburris SDZ Planning Scheme (2019) sets out the site specific land use objectives for Site 3. We refer An Bord Pleanála to Section 3.1 of this Report, below, which confirms how the proposed development is consistent with the specific land use objectives of the Planning Scheme.

We would note that a small portion of land is zoned 'Objective OS' and is situated outside the Planning Scheme area. At this location, a link to the existing open space is proposed.

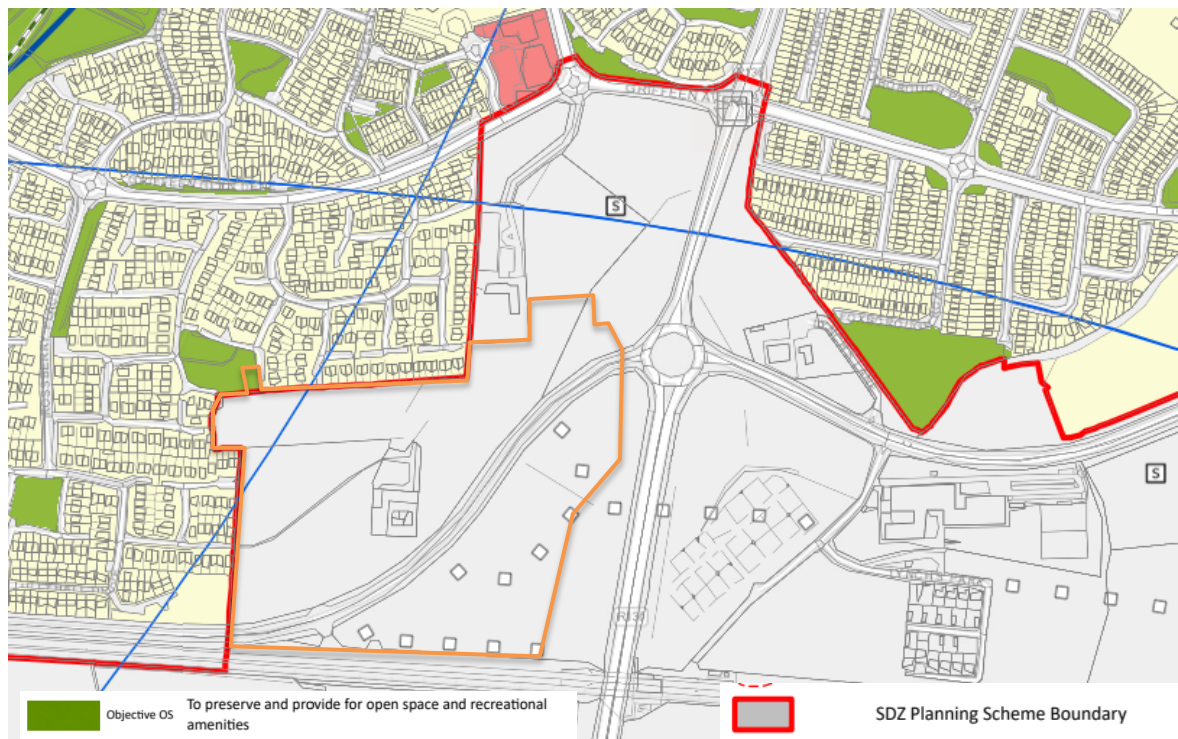


Figure 1: Extract from Land Use Zoning Maps of the South Dublin Development Plan 2022-2028 with the application site Site 3 outlined indicatively in orange (Overlay by SLA). Please note that the Adamstown Avenue and the North Link Street are excluded from the site area and the Board should refer to the enclosed Site Location Plan prepared by O'Mahony Pike Architecture for the exact extent of the red line boundary.

2.3 Green Infrastructure

South Dublin has a number of Strategic Green Infrastructure Corridors. The Clonburris lands fall within Strategic Corridor 3, the **Grand Canal Corridor**. The Grand Canal is a key national Green Infrastructure feature, acting as a major ecological and recreational link between the River Shannon in the midlands and Dublin City where the canal enters the sea.

Policy NCBH9: Grand Canal seeks to:

*"Protect and promote the Grand Canal as a key component of the County's **Green Infrastructure and ecosystem services network**, and protect and enhance the visual, recreational, environmental, ecological, industrial heritage and amenity value of the Grand Canal, recognising its sensitivities as a **proposed Natural Heritage Area** with adjacent wetlands and associated habitats."*

The following objectives are also relevant to the proposed development:

NCBH9 Objective 3:

*“To ensure that development along or adjacent to the Grand Canal contributes to the creation of an integrated network of appropriately designed **walking and cycling routes** connecting with the **Grand Canal Way Green Route** and which takes due cognisance of the sensitive nature of this **national ecological corridor**.”*

NCB9 Objective 4:

*“To ensure that development along and adjacent to the Grand Canal protects and **incorporates natural heritage features** including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and includes an appropriate set-back distance or **buffer area** from the pNHA boundary to facilitate protected species and biodiversity and a **fully functioning Green Infrastructure network**.”*

*“To ensure that all development proposals along the Grand Canal are accompanied by an **EclA (ecological impact assessment)** prepared by a qualified ecologist and that the recommendations of the EclA are incorporated into any development proposals including a **landscape plan** prepared by a qualified landscape architect. Where new canal crossings (that is, footbridges / cycle bridges) are proposed, they should be designed so as to avoid fragmentation of linear habitat associated with the Grand Canal.”*

[SLA bold font emphasis]

The Site 3 development is located north of the Dublin-Cork rail line and is not immediately proximate to the Grand Canal. The Grand Canal lies south of Site 4 of the overall Application site.

The overall Part X development has been designed to protect and respect the Grand Canal through the advice and direction of site ecologists JBA Consulting who have prepared the Biodiversity Environmental Impact Assessment Report Chapter.

2.4 Housing

It is identified in Chapter 6 that the planned growth for the 6 year Development Plan period to 2028, comprising 93% of new homes within the Dublin City and Suburbs settlement, will be achieved through the re-use, infill and consolidation of existing urban areas and sustainable intensification along public transport networks, at the ‘REGEN’ zoned lands, the Adamstown and Clonburris SDZs, and the new district at Fortunestown.

The proposed development is consistent with the promotion of consolidation and intensification of development within the Clonburris SDZ and along the rail corridor. It will make a positive contribution towards meeting the specific residential growth target (9,416no. units) within the Clonburris SDZ Planning Scheme development boundary. The Site 3 proposal includes **580no. residential units** and supporting uses and facilities. This is also consistent with the specific housing allocation for this development tile within the SDZ planning scheme, as discussed further in Section 3 of this report, below.

H1 Objective 12, relating to housing typology, requires that: -

*“Proposals for residential development shall provide a **minimum of 30% 3-bedroom units**, a lesser provision may be acceptable where it can be demonstrated that:*

- *there are unique site constraints that would prevent such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme.*

Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).”

In accordance with H1 Objective 12, the proposed residential development at Site 3 will provide:

- 140no. 1 bed units (24%)

- 151no. 2 bed units (26%)
- **289no. 3 bed units (50%)**

Policy H7, promotes **high quality** residential development. It states: -

“Promote high quality design and layout in new residential developments 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.”

Policy H8, relating to **public amenity open space**, seeks to: -

“Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.”

Policy H9, relating to **private open space**, seeks to: -

“Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.”

The proposed development is of a high-quality design, being consistent with all relevant residential amenity standards, including public and private open space, discussed primarily in relation to the Clonburris SDZ Planning Scheme, in Section 3 below.

We refer An Bord Pleanála to the overarching Part 10 architectural rationale provided in the Architects Design Statement, prepared by O’Mahony Pike Architects. We refer also to the Site 3 specific architectural plans and design rationale prepared by O’Mahony Pike Architects.

For public open space and landscape design we refer An Bord Pleanála to the overarching Part 10 landscape design rationale provided by Doyle & O’Troithigh Landscape Architecture. We refer also to the Site 3 specific landscape architecture plans and design rationale prepared by Doyle & O’Troithigh Landscape Architecture.

2.5 Car Parking Standards

Section 12.7.4 of the Development Plan, relating to Car Parking Standards, sets out the maximum parking rates for residential and non-residential development. Parking rates set out within the Development Plan are divided into two main categories depending on the proximity of the proposed development to nearby amenities or to public transport infrastructure:

- “Zone 1: General rate applicable throughout the County;
- **Zone 2 (Non Residential):** More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction).
- **Zone 2 (Residential):** More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 400-500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service).”

As confirmed within the Clonburris SDZ Planning Scheme (see Section 3.2 below), Site 3 is prescribed an ‘accessibility level’ of 1, where the **Zone 2** parking standards of the Development Plan apply.

2.5.1 Proposed Car Parking

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Category	Land-Use	Zone 1	Zone 2
Education	College of Higher Education	1 per staff plus 1 per 15 students	1 per 2 staff plus 1 per 30 students
	Crèche School ⁹	1 per classroom	0.5 per classroom

Figure 2: Extract from Table 12.26 - Maximum Parking Rates of the South Dublin Development Plan 2022-2028

We refer the Board to the following car parking table, extracted from the 'Traffic and Transportation Report' prepared by DBFL Consulting Engineers, identifying the maximum car parking standards of the County Development Plan for the Site 3 development:

Unit Type	No. of Units / GFA (m ²)	Total-Residential	SDCC (Zone 2: Standard)	SDCC Req.
Apartments	1-bed 32	76	0.75	24
	2-bed 36		1	36
	3-bed 8		1.25	10
Duplexes	1-bed 108	359	0.75	81
	2-bed 115		1	115
	3-bed 136		1.25	170
Houses	2-bed 0	145	1.25	0
	3+-bed 145		1.5	218
Total Residential				654
Crèche	553 m ²		0.5 per classroom	3
Total non-residential				3
Total Maximum Car Parking Per Requirement				657
20 % Minimum EV Charging Parking Requirement (SDCC dev. plan)				91
5% Minimum Accessible Parking Requirement (National Guidance)				22

Figure 3: Extract from Table 4 of the Traffic and Transportation Report prepared by DBFL Consulting Engineers identifying car parking maximum requirements

The Development Plan states that the number of car parking spaces provided for any particular development should not exceed the maximum provision. It is however also stated that: -

*"The maximum parking standards **may also be varied** in particular areas by the Planning Authority through planning mechanisms such as **SDZ Planning Schemes**, Local Area Plans or Movement Framework Plans and Area Access Studies."*

[SLA bold font emphasis]

Section 12.7.5 of the Development Plan, relating to the promotion of **electric vehicle charging**, states: -

"EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas."

Proposed Site 3 provides for **456no. surface car parking spaces**. Consistent with the Development Plan standards, 100no. (c.33%) of the Site 3 car parking spaces shall be equipped with functional EV charging

points and shall be reserved for the use of battery-powered electric vehicles. The balance of the proposed car parking spaces in Site 3 will be 'future-proofed' through the inclusion of cables or ducting to allow the rapid future installation of additional EV charging points, as allowed by the Planning Scheme for this type of development.

We refer the Board to the Traffic & Transport Assessment and Residential Travel Plan, prepared by DBFL Consulting Engineers for further discussion in relation to proposed car parking provision.

Further discussion in relation to car parking requirements in the context of the Planning Scheme is addressed in Section 3.2 of this Report below.

2.6 Bicycle Parking Standards

Section 12.7.1 – Bicycle Parking / Storage Standards of the Development Plan set out the minimum bicycle parking / storage for all new developments by land-use. Bicycle parking / storage rates are divided into two main categories: -

- *Long Term: These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.*
- *Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.*

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 bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-

Figure 4: Extract from Table 12.23 – Minimum Bicycle Parking Rates of the South Dublin Development Plan 2022-2028

We refer the Board to the following tables relating to proposed bicycle parking for the Site 3 development, extracted from the 'Traffic and Transportation Report' prepared by DBFL Consulting Engineers. This demonstrates the consistency of the proposed development with the long and short stay bicycle parking standards of the County Development Plan or Apartment Design Guidelines for Planning Authorities (2023), as applicable:

Unit Type	No. of Beds	No. of Units / GFA (m ²) / No.	No. of Beds	SDCC Standard		SDCC Req.	
				Long-Stay	Short-Stay	Long-Stay	Short-Stay
Apartments	1	32	32	1 per Bed	1 per 2 Units	32	16
	2	36	72			72	18
	3	8	24			24	4
Duplexes	1	108	108	1 per Bed	1 per 2 Units	108	54
	2	115	230			230	58
	3	136	408			408	68
Houses	2	0	0	-	-	-	-
	3	145	435	-	-	-	-
Crèche		553 m ²	-	1 per 5 staff	1 per 10 children	4	12
Sub-Total Cycle Parking Per Requirement						874	218
Total Cycle Parking Per Requirement						1092	
EV Cycle Parking Per Requirement						23	

Figure 5: Extract from Table 8 of the Traffic and Transportation Report prepared by DBFL Consulting Engineers identifying the applicable cycle parking requirements

Table 13.24 of the Development Plan sets out the minimum bicycle parking standards for apartments / duplexes, reflecting the standards prescribed in the Apartment Guidelines.

The Site 3 proposal provides 1,116no. bicycle parking spaces, consisting of 882no. long stay and 234no. short stay spaces. In accordance with the requirements of the Planning Scheme, 23no. electric cycle spaces are provided.

We refer the Bord to the Traffic & Transport Assessment and Mobility Management Plan, prepared by DBFL Consulting Engineers for further discussion in relation to bicycle parking provision.

Further discussion in relation to cycle parking requirements in the context of the Clonburris SDZ Planning Scheme is contained in Section 3.2 of this Report.

3 COMPLIANCE WITH CLONBURRIS STRATEGIC DEVELOPMENT ZONE PLANNING SCHEME 2019

Site 3 is subject to the Clonburris SDZ Planning Scheme 2019 ("the Planning Scheme"). The key principles, fixed objectives and standards of the Planning Scheme of relevance to the proposed development are examined below.

3.1 Land Use and Density

The Key Principles relevant to the land use and density of development at the Site 3 site are identified in Section 2.1 of the Planning Scheme as follows: -

- *"To co-ordinate **residential, educational, employment and community** uses and integrate such with **transportation infrastructure** in a manner that maximises and makes efficient use of existing and planned public transport services and local facilities;*
- *To promote a **mix of uses** around the public transport nodes in a manner that creates viable and active urban centres;*
- *To promote **increased residential densities** within walking distance of public transport nodes in a manner that creates viable and active urban centres*
- *To support the development of **sustainable communities** and to ensure that new residential development is carried out in accordance with Government policy in relation to the development of*

housing and residential communities, catering for a range of dwelling, types, sizes and tenure options.”

It is respectfully submitted that the proposed development is in accordance with the above key principles, as may be demonstrated within this report and in the plans and particulars enclosed with the application.

Figure 2.1.2 and **Tables 2.1.1, 2.1.2** and **2.1.3** of the Planning Scheme identify the areas zoned as ‘Primarily Residential’, ‘Mixed Use Areas’ and ‘Open Space Areas’ as well identifying the uses considered ‘permissible’ and ‘open for consideration’ within these land use zonings.

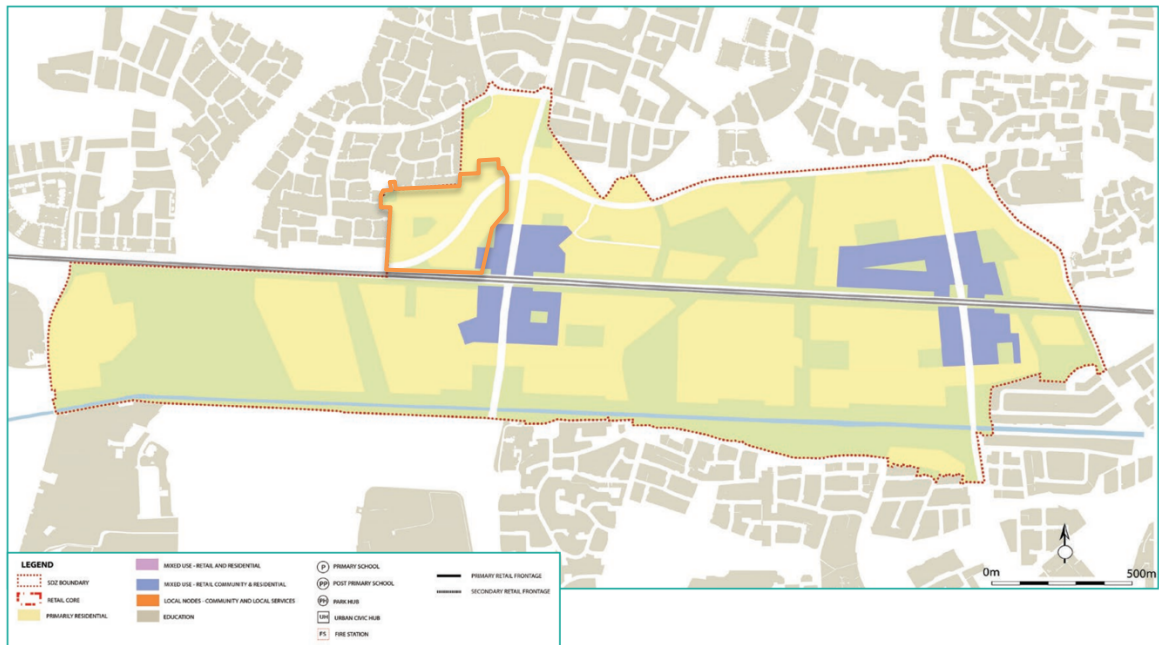


Figure 6: Land Use Area Map of the Clonburris Planning Scheme, with the SITE 3 site highlighted indicatively in orange (Overlay by SLA).

The majority of Site 3 is zoned as ‘Primarily Residential’. A small portion at its south eastern corner is ‘Mixed Use Areas’, with some other areas throughout the site zoned ‘Open Space Areas’.

The uses considered ‘permissible’ and ‘open for consideration’ under these land use zonings are identified in the tables below.

Table 2.1.1 | Uses Permissible & Open for Consideration in Residential Areas

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

- a. Local Nodes only
- b. Local Nodes only and subject to SDZ Section 2.5 (Retail) convenience cap for Local Nodes

Table 2.1.3 | Uses Permissible & Open for Consideration in Open Space Areas^a

Permitted in Principle	Allotments, Cultural Use, Open Space, Recreational Facility, Sports Club/Facility.
Open for Consideration	Agriculture, Childcare Facilities, Community Centre, Education, Place of Worship Public Services, Recycling Facility, Restaurant/Café, Shop-Local, Stadium, Traveller Accommodation.

- a. Subject to requirements of SDZ Section 2.11.2 (Biodiversity and Natural Heritage Features)

Table 2.1.2 | Uses Permissible & Open for Consideration in Mixed Use Areas

Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car park, Childcare Facilities, Community Centre, Conference Centre, Cultural use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Guest House, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Open Space, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential, Residential Institution, Restaurant/Café, Retirement Home, Shop-Local, Shop-Neighbourhood, Shop - Major Sales Outlet, Social Club, Sports Club/Facility, Veterinary Surgery.
Open for Consideration	Allotments, Garden Centre, Motor Sales Outlet, Nightclub, Petrol Station, Science and Technology Based Enterprise, Service Garage, Traveller Accommodation, Wholesale Outlet, Stadium.

Figure 7: Tables 2.1.1, 2.1.2 and 2.1.3 of the Planning Scheme identifying uses considered permissible and open for consideration with areas zoned 'Primarily Residential', 'Mixed Use' and 'Open Space Areas'

On that part of Site 3 zoned '**Primarily Residential**', 548no. residential units and a childcare facility (553 sq m) are proposed. The proposed uses are all 'Permissible' in the 'Primarily Residential' land use zone, per Table 2.1.1 of the Planning Scheme.

On the lands zoned '**Open Space**' throughout Site 3, areas of open space are proposed, consistent with the Planning Scheme Table 2.1.3 'Permissible' use for this land use zoning.

The small portion of Site 3, located within the Kishoge Urban Centre, is zoned '**Mixed Use Areas**'. 32no. residential units are proposed and 'Permissible' per Table 2.1.2 of the Planning Scheme

3.1.1 Character Area

To provide more detailed design guidance for the envisaged development within the SDZ lands, the Planning Scheme sub-divides the development area into 3no. Character Areas. These Character Areas are then further sub-divided into 'Sub-Sectors' or development tiles.

Site 3 is part of a larger Part X Application Site for residential-led development by the local authority, which is located within the Kishoge Character Area. More specifically, Site 3 is located primarily within the Kishoge North West development area, with some encroachment into the Kishoge Urban Centre Development Area.

3.1.2 Kishoge South West & Kishoge Urban Centre - Development Parameters

Site 3 is located primarily within **Development Area 7 – Kishoge North West**, and including all or part of Sub Sectors KNW-S1, KNW-S2, KNW-S3.

A small portion of the Site 3 development is located within **Development Area 6 – Kishoge Urban Centre**, including part of Sub Sector KUC-S1.

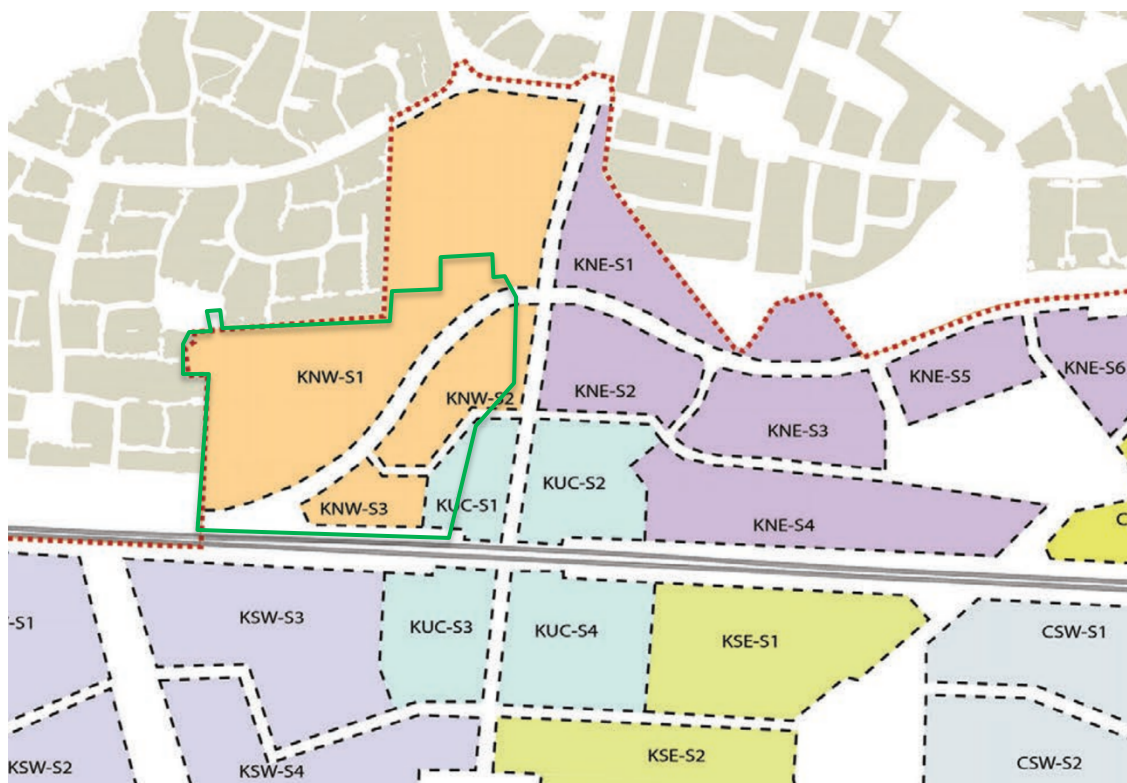


Figure 8: Extract from Clonburris SDZ Planning Scheme 2014 with the application site highlighted indicatively in green (Overlay by SLA).

The Planning Scheme identifies a number of **Key Objectives** for **Development Area 7 – Kishoge North West**. Table 1 below states the key objective in the first column. Confirmation of how the proposed Site 3 development is consistent with same is provided in the corresponding cell of the second column.

Key Objective:	Site 3 Consistency:
To develop a high quality residential neighbourhood at Kishoge, with strong links with the existing community at Griffeen;	<p>The proposed development is representative of a high-quality residential-led scheme within Kishoge North West.</p> <p>We refer the Board to the overarching Part 10 architectural design statement, provided in the Architects Design Statement, prepared by O'Mahony Pike Architects. We refer also to the Site 3 specific architectural plans and design rationale prepared by OMP Architects. These illustrate and describe the proposed scheme, being consistent with the design principles within the sub sectors.</p> <p>For public open space and landscape design we refer the Board to the overarching Part 10 landscape design rationale provided by Doyle O'Troithigh Landscape Architects. We refer also to the Site 3 specific landscape architecture plans and design rationale prepared by Doyle O'Troithigh Landscape Architects.</p> <p>As demonstrated on the enclosed site plan, the proposal provides strong links to the existing community at Griffeen, with a north / south green corridor running through the site as well as a local street connecting directly to Oldbridge Grove.</p>
To reinforce the existing local node at Griffeen with new open space and education facilities;	Existing and permitted school facilities are situated immediately north of Site 3, within sub sector KNW-S1.

	A green corridor is proposed to connect Site 3 to the school site to the north and the railway station to the south at Kishoge Urban Centre, which will reinforce wider, sustainable community connectivity.
To provide locally accessible open spaces and links to strategic open space;	<p>We refer the Board to the overarching Part 10 landscape design rationale provided by Doyle O'Troithigh Landscape Architects. We refer also to the Site 3 specific landscape architecture plans and design rationale prepared by Doyle O'Troithigh Landscape Architects.</p> <p>Proposed local parks within the Site 3 plan are reflective of the urban design and public open space objectives of the Planning Scheme. The proposed local parks in KNW-S1 are linked to existing residential development to the north and east.</p> <p>Green and blue corridor connectivity along the R136 and rail corridor edges also enhance north-south and east-west connections with existing and proposed development.</p> <p>A series of smaller pocket parks and spaces located throughout the proposed scheme provide further open space relief and integration with the local landscape.</p>
To develop a new post-primary to complement the existing primary school;	Post primary school facilities have been permitted at lands adjoining to the north of Site 3, to be developed by the Department of Education and Skills.
To ensure high levels of legibility and ease of orientation;	<p>Building height, street function and permeability, and links with local parks and green corridors, within the proposed scheme is generally aligned with the Planning Scheme development parameters, which seek to achieve legibility, permeability and sense of place within Kishoge North West, as a new residential neighbourhood.</p> <p>The prescribed height for Sub Sectors KNW-S1, KNW-S2, KNW-S3 is 2-6 storeys, whilst Sub Sector KUC-S1 has a prescribed height range of 3-8 storeys. The proposed Site 3 development is consistent with these height thresholds.</p>
To provide a new quality frontage along Adamstown Avenue;	<p>Adamstown Avenue (existing arterial route) travels east-west through the site. The proposed scheme ensures robust frontage, generally in accordance with the fixed building lines, junctions/permeability and building height objectives of the Planning Scheme for this area.</p> <p>The proposed Site 3 plan responds as well as possible to street grid and fixed building lines where they are disrupted by existing strategic infrastructure at the following locations:</p> <ul style="list-style-type: none"> At the junction of the fixed and consented North Link Street and a local street, existing strategic infrastructure, in the form of the ESB 38kv Balgaddy Station. Along the eastern site boundary, where wayleaves are associated with strategic gas and water mains that cannot be relocated. <p>This requires some unavoidable localised departure from the street frontage details of the Planning Scheme.</p>
To provide for a range of housing of a scale that reflects the type of street and its role in the urban structure.	The Site 3 proposal includes 140no. 1 bed units (24%), 151no. 2 bed units (26%), 289no. 3 bed units (50%). This is in accordance with the requirements of the SDCC Development Plan.

	The Site 3 proposal is consistent with the building height range prescribed for this area under the Planning Scheme. This ensures building height transition and variation appropriate to the identified street types and in the interests of residential and visual amenity, legibility and ease of orientation.
The design of the school will be informed by the Department of Education and Skills 'General Design Guidelines for Schools: Primary & Post Primary (2017)' or any superseding guidance.	The design of planned or permitted school facilities are subject of separate planning permissions obtained by the DES.

Table 1 – Key Objectives for Development Area 6 – Kishoge North West accompanied by a consistency response



Figure 9 - Extract from Kishoge North West Development Area, indicating Site 3 area (outlined orange) with existing Adamstown Arterial Street (blue line) and fixed and consented North Link Street (red line), within the context of local and intimate streets and green spaces. (Overlay by SLA).

3.1.3 Residential Units

Table 2.13.1 of the Planning Scheme prescribes the total number of dwellings for each Development Area and for each of its Sub-Sectors. The total dwelling numbers to be achieved should lie within the range the of low margin, target and high margin figures identified below.

Table 2 below provides a summary of the units proposed in each sub-sector lying within Site 3, compared with the range prescribed for each sub-sector by Table 2.13.1 of the Planning Scheme.

Sub-Sector	Sub-Sector Net Area	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	Proposed Site 3 Dwellings
KNW-S1*	7.73ha	325	360	402	323
KNW-S2*	2.27ha	125	136	148	139
KNW-S3	1.16ha	64	70	75	86
KUC-S1*	1.59ha	103	151	199	32
		617	717	824	580

Table 2 – Comparison of Residential Unit Targets for Kishoge North West (extract from Table 2.13.1 of SDZ Planning Scheme) and Proposed dwelling numbers within KSG 3. (* Site 3 only occupies part of KNW-S1, KNW-S2 and KUC-S1)

It should be noted that while Site 3 includes the entirety of subsector KNW-S3, it includes only part of subsectors KNW-S1, KNW-S2 and KUC-S1. Site 3 occupies the following proportion of each of the sub-sectors:

- 93% of **KNW-S1** resulting in a net site area of c. 7.2ha.
- 94% of **KNW-S2** resulting in a net site area of c. 2.13ha.
- 100% of **KNW-S3** resulting in a net site area of c. 1.16ha.
- 49% of **KUC-S1** resulting in a net site area of c. 0.78ha

Taking this into account, Table 3 below identifies the pro rata quantum of Total Dwellings (Low, Target and High Margin) proposed for that part of the Sub Sectors included within Site 3.

Sub-Sector	SITE 3 Net Site Area	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	Proposed SITE 3 Dwellings
KNW-S1*	7.2ha	302	334	381	323
KNW-S2*	2.13ha	117	127	139	139
KNW-S3	1.16ha	64	70	75	86
		483	531	595	548
KUC-S1*	0.78ha	51	151	98	32
		534	682	693	580

Table 3 – Comparison of Residential Unit Targets for Kishoge North West and Kishoge Urban Centre (extract from Table 2.13.1 of SDZ Planning Scheme) using net site area of Site 3 within KNW-S1, KNW-S2 and KUC-S1.

As confirmed by Table 3 above, the total dwellings proposed for that part of Site 3 falling within Sub Sectors **KNW-S1** and **KNW-S2** is consistent with the Planning Scheme.

In **KNW-S3**, 86no. units are proposed, **exceeding the high margin** total threshold (by 11no. units). We refer to the flexibility for unit transfer between immediately adjacent sub sectors, provided by the Planning Scheme, which states:

“Subject to no net loss of units within a Development Area and the achievement of the built form objectives, the Planning Authority may allow up to 10% of the maximum residential units allocated in any Sub Sector to be transferred to an immediately adjacent Sub Sector”

It is highlighted that the total 86no. dwellings achieved exceeds the high margin threshold of KNW-S3 by 12%. Arguably, up to 10% of the max. unit threshold in KNW-S1 (i.e. 38no.) could be transferred to adjacent KNW-S3. 11no. dwellings (2.9% of the maximum unit threshold in KNW-S1) have been transferred to adjacent KNW-S3. This ensures **no net loss of units within Development Area 7**, consistent with the Planning Scheme.

In **KUC-S1** (Development Area 6), 32no. dwellings are proposed. This falls significantly below the low margin total threshold of 103no. dwellings for this sub-sector. However, Site 3 occupies only a small part of KUC-S1. The enclosed Architectural Design Statement prepared by O’Mahony Pike Architects provides a masterplan and schedule that confirms that a further 161no. dwellings will be provided for in future planning applications. In combination, the proposed Site 3 dwellings and the future proposals will deliver an overall total of 193no. dwellings in KUC-S1, in line with the requirements of the Planning Scheme.

Overall, as demonstrated in Table 3 above, the total dwelling numbers proposed within Site 3 (580no.) is consistent with the overall range (low margin, target and high margin) of dwelling numbers for those parts of the Kishoge North West and Kishoge Urban Centre Development areas contained within Site 3. The total number of dwellings proposed within Site 3 is consistent with the Planning Scheme.

3.1.4 Residential Density

Residential Density is prescribed per Sub-Sector, in accordance with the density margins set out in **Table 2.1.8** of the Planning Scheme, as follows:

Sub-Sector	Net Site Area	Net Density Margin Per Ha (Min)	Net Density Margin Per Ha (Max)	Proposed Net Density Site 3
KNW-S1*	7.73ha	42dph	52dph	42dph
KNW-S2	2.27ha	55dph	65dph	61dph
KNW-S3	1.16ha	55dph	65dph	74dph
KUC-S1*	1.59ha	65dph	125dph	20dph

Table 3 – Comparison of Residential Density Targets for Kishoge North West Sub Sectors (extract from Table 2.1.8 of SDZ Planning Scheme) and Proposed density within KSG 3. (* SITE 3 only occupies part of KNW-S1, KNW-S2 & KUC-S1)

As identified previously, Site 3 occupies the following proportion of each of the sub-sectors:

- 93% of **KNW-S1** resulting in a net site area of c. 7.2ha.
- 94% of **KNW-S2** resulting in a net site area of c. 2.13ha.
- 100% of **KNW-S3** resulting in a net site area of c. 1.16ha.
- 49% of **KUC-S1** resulting in a net site area of c. 0.78ha

This is reflected in Table 4 below, with the application of the Planning Scheme density range to that part of the **KNW-S1**, **KNW-S2**, **KNW-S3** and **KUC-S1** within Site 3, and thus the proposed Site 3 density, as follows:

Sub-Sector	Net Site Area	Net Density Margin Per Ha (Min)	Net Density Margin Per Ha (Max)	Proposed Net Density SITE 3	% above / below density range
KNW-S1*	7.2ha	42dph	52dph	45dph	-
KNW-S2	2.13ha	55dph	65dph	65dph	-
KNW-S3	1.16ha	55dph	65dph	74dph	+14%
KUC-S1*	0.78ha	65dph	125dph	41dph	-37%

Table 4 – Comparison of Residential Density Targets for Kishoge North West Sub Sectors (extract from Table 2.1.8 of SDZ Planning Scheme) using net site area of SITE 3 within KNW-S1, KNW-S2 & KUC-S1)

It may be further noted that the Planning Scheme allows:

“In the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.”

The proposed residential density within Sub Sectors **KNW-S1** and **KNW-S2** are **consistent** with the Planning Scheme minimum and maximum density margin.

The proposed residential density within Sub Sector **KNW-S3** (at 74 dph) **exceeds the upper density range** of 65 dph. This also exceeds the permissible margin of +5 dph at the upper density margin.

As identified above, 2.9% of the maximum unit threshold in KNW-S1 (i.e. 11no. units) have been reallocated to adjacent KNW-S3. This has a knock-on impact on the resultant residential density for the sub-sector. As the Planning Scheme allows for transfer of units between subsectors, we would submit that this modest transfer between sub-sectors within the same Site 3 development proposal, while a departure from the detail, is generally consistent with the overall dwelling numbers and density range for this character area, prescribed by the Planning Scheme.

The proposed residential density within Sub Sector **KUC-S1** falls below the lower end of the density margin. We note the mixed use, urban centre, nature of KUC, where dwellings per hectare is not a totally accurate reflection of density. Within this development tile, Site 3 occupies only part (49%) of KUC-S1. We further note that all of the Open Space provision for KUC-S1 is delivered within Site 3, further skewing the residential

density calculation. As such, we would submit that it would be unreasonable to conclude that this part of Site 3 is inconsistent with the development objectives of the Planning Scheme for the Kishoge Urban Centre area.

The enclosed Architectural Design Statement prepared by O'Mahony Pike Architects confirms that 161no. residential units can be provided through future planning applications within the balance of KUC-S1. Combined with the Site 3 proposal for this sub-sector, a resultant density of c.120dph would be achieved in KUC-S1, consistent with the density range of the Planning Scheme.

We are of the considered opinion that the proposed residential density within Sub Sector **KNW-S1, KNW-S2, KNW-S3 and KUC-S1** is **consistent** with the Planning Scheme minimum and maximum density margin, noting the potential for future development on the balance of the lands.

If An Bord Pleanála deem necessary, the applicant is open to a condition omitting the required number of units to provide a net density within the density ranges provided for within the Planning Scheme.

3.1.5 Residential Dwelling Mix

Section 2.1.6 of the Planning Scheme states: -

"The range of dwellings permitted in Clonburris include houses, townhouses, duplex units, maisonettes and apartments (including Build to Rent and Shared Accommodation)."

The proposed Site 3 development includes a mix of dwelling types in the form of houses, duplex / triplex and apartments, including: -

- 145no. houses.
- 359no. duplexes / triplexes
- 76no. apartments

The associated mix of dwelling sizes is as follows: -

- 140no. 1 bed units (24%)
- 151no. 2 bed units (26%)
- **289no. 3 bed units (50%)**

The Planning Scheme does not prescribe a specific dwelling mix ratio for the SDZ development area, its Character Areas or sub-sectors, in order to facilitate market flexibility over the lifetime of the plan.

However, it is noted that the current County Development Plan prescribes that:

*"Proposals for residential development shall provide a **minimum of 30% 3-bedroom units, a lesser provision may be acceptable** where it can be demonstrated that:*

- *there are unique site constraints that would mitigate against such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme"*

The proposed development at Site 3 includes **289no. 3-bed dwellings**, equivalent to **50%** of the dwelling mix. This is consistent with the Development Plan requirement that for a minimum of 30% 3-bedroom units.

Duplex and Triplex units are categorised as apartment units. Therefore, the mix of such unit types is under the Apartment Guidelines (2023). **SPPR 1** of the Apartment Guidelines requires that,

*"Housing developments may include up to **50% one-bedroom or studio type units** (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and*

Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)."

When the housing units (145no.) are excluded, 435no. apartment type units are proposed, with a mix is as follows:

- **140no. 1 bed units (32%)**
- 151no. 2 bed units (35%)
- 144no. 3 bed units (33%)

The proposed number of **1-bed units in Site 3 does not exceed 50%** and is **consistent with SPPR 1** of the Apartment Guidelines (2023).

We refer the Board to the Design Rationale, Schedule of Accommodation and Housing Quality Assessment (HQA), prepared by O'Mahony Pike Architects which demonstrates the mix and quality of the dwellings proposed.

3.1.6 Social Housing

We can confirm all proposed residential units are for South Dublin County Council housing purposes (social and affordable).

We refer to the enclosed Indicative Tenure Plan prepared by O'Mahony Pike Architects for further detail.

3.1.7 Dwelling Size and Private Amenity Space

The Planning Scheme requires that the design and layout of individual dwellings should provide a high quality living environment for residents. Dwellings should provide adequate room sizes that create good quality living spaces. In this regard, the Planning Scheme requires that all proposed houses shall accord with or exceed the minimum floor area standards set out in **Table 2.1.9**.

Table 2.1.9 | Minimum Space Standards for Houses

Type of Unit	Houses	Private Open Space
One Bedroom	50 sq.m	48 sq.m
Two Bedroom	80 sq.m	55 sq.m
Three Bedroom	92 sq.m	60 sq.m
Four Bedroom or more	110 sq.m	70 sq.m

Figure 10: Extract from Table 2.1.9 – Minimum Space Standards for Houses from the Clonburris SDZ Planning Scheme

We refer to the enclosed plans and particulars prepared by O'Mahony Pike Architects demonstrating compliance with Table 2.9.1 of the Planning Scheme.

In respect to apartment units, the Planning Scheme requires that all apartments shall accord with or exceed the open space and floor area standards set out in Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities and as provided in Table 2.1.10 of the Planning Scheme.

Table 2.1.10 | Minimum Space Standards for Apartments

Type of Unit	Apartments	Private Open Space	Communal Open Space	Storage
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7 sq.m	6 sq.m
Three Bedroom	90 sq.m	9 sq.m	9 sq.m	9 sq.m
Four bedroom or more	105 sq.m	12.5 sq.m	12.5 sq.m	12 sq.m

Figure 11: Extract from Table 2.1.10 – Minimum Space Standards for Apartments from the Clonburris SDZ Planning Scheme

We refer to the enclosed plans and particulars prepared by O'Mahony Pike Architects, which demonstrate compliance with the dwelling size and amenity standards of Table 2.9.1 of the Planning Scheme and the Apartment Guidelines.

3.1.8 Non-Residential Development

As identified in Planning Scheme **Table 3.3.7** for **Kishoge North West**, there is no specified quantum for any non-retail commercial, retail or community uses within the residential subsectors of Site 3.

We would highlight that, as evidenced in the enclosed plans and particulars prepared by O'Mahony Pike Architecture, a childcare facility (c. 553 sqm) is proposed in the northern section of Site 3, close to the school site. The location of the childcare facility has been carefully chosen, having regard to the Planning Scheme promotion of:

“the co-location of purpose built childcare facilities with primary schools and supports the provision of purpose built childcare facilities adjacent to existing or planned primary schools. Childcare facilities should be within walking and cycling distance of educational, community facilities and employment locations.”

The childcare facility is in close proximity to the existing Lucan East Educate Together National School to the north. The Kishoge Urban Centre is then also easily accessible, within walking distance to the east, which will provide a range of non-retail commercial, retail development and community uses for Kishoge North West.

We note that Planning Scheme **Table 3.3.6** for **Kishoge Urban Centre** identifies the quantum of non-retail commercial, retail development and community uses required within this development area. However, given the minor extent of KUC-S1 contained within the Site 3 boundary, it is only possible to deliver the required open space and 32no. residential units within the site area.

As the local authority is not a commercial developer, it is envisaged that the balance of the Kishoge Urban Centre mixed use will be delivered by others in separate future applications. The enclosed Architectural Design Statement, prepared by O'Mahony Pike Architecture, envisages as a masterplan exercise that c. 2,500sqm of employment and c. 300sqm of retail uses is capable of being delivered in the remaining part of the KUC-S1 Sub-Sector.

3.2 Movement and Transport

3.2.1 Overall Movement Concept

Figure 2.2.7 of the Planning Scheme sets the fixed and flexible Overall Movement Concept associated with the Kishoge North West Development Area of the Clonburris Planning Scheme.

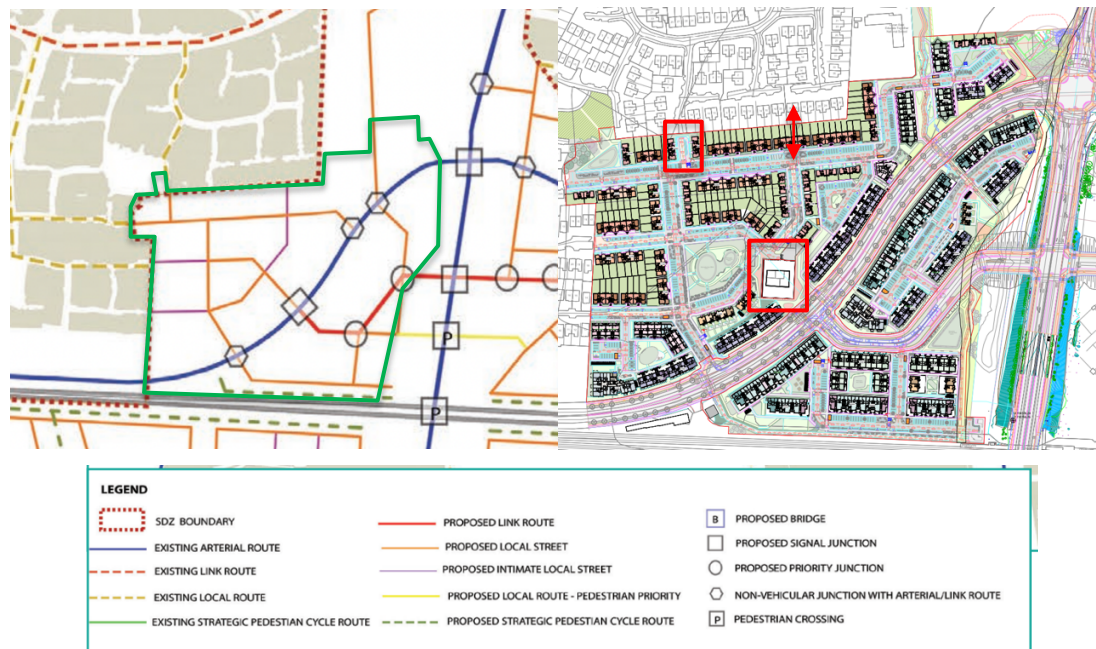


Figure 12: Extract from Figure 2.2.7 of the Planning Scheme showing Street Hierarchy with application site indicatively outlined in green (Overlay by SLA).

As illustrated above, the existing ESB 38kv Balgaddy Station is a significant existing strategic site constraint to development in this area, which requires some necessary departure from the detail of the Planning Scheme, in terms of junction functionality along existing Adamstown Avenue.

The proposed design has been co-ordinated with recently granted North Link Steet (NLS) under SDZ24A/0033W and the fixed link street alignment remains consistent with the Planning Scheme. In particular, a vehicular movement junction (square icon) at Adamstown Avenue and the NLS is proposed to be relocated further south west, consistent with recently permitted NLS layout. The planned vehicular movement junction in the area of the ESB station (square icon) is then replaced with a proposed non-vehicular junction (hexagon icon).

At the original location of the vehicle movement junction, a T-junction will remain. **Table 2.2.1** – ‘Street Hierarchy, Alignment and Speed’ of the Planning Scheme confirms that Local Streets (Internal Local Streets & Homezones/Intimate Local Streets) are flexible in terms of their alignment and centre line. As the local street is not fixed, the current encroachment of the existing ESB station does not then render the Site 3 plan inconsistent with the Planning Scheme indicative junction diagram.

The ‘Proposed Intimate Street’ in the north western section of Site 3 is proposed as a potential future connection to Oldbridge Court, only slightly further west than the location identified within Figure 2.2.7 of the Planning Scheme. Its indicative position as identified in the Planning Scheme (i.e. intimate streets are not ‘fixed’) is not feasible, given that it adjoins to the rear garden of an existing house in Oldbridge Glen. The ‘Intimate Street’ at the proposed location in Site 3 will facilitate achievable, sustainable pedestrian and cycle links to the existing Griffeen residential community, in a manner that remains consistent with the key objectives of the Planning Scheme for the Kishoge North West Development Area.

We would respectfully submit that this minor departure from the detail of the ‘intimate street’ connection to the existing Griffeen housing area is not in conflict with the Planning Scheme plan for this area.

We would further highlight that a link to the Griffeen housing area is facilitated via a proposed area of public open space (Rossberry Park) in the north western corner of Site 3, generally in accordance with the Planning Scheme to provide a link to the existing neighbouring open space at Griffeen.

3.2.2 Car Parking Standards

Section 2.2.6 of the Planning Scheme states: -

“The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme. The standards are maximum parking standards and should not be viewed as a target. Details in relation to the design of car parking are set out under Section 2.8 (Built Form and Design) of this Planning Scheme.”

The ‘Accessibility Levels’ identified in **Figure 2.2.8** of the Planning Scheme (see below) correspond to the Parking Zones stated in the Development Plan accordingly: -

- Zone 2 parking standards prescribed under the Development Plan shall be applied to all areas that have been identified with an Accessibility Level of 1, 2 or 3.
- Zone 1 parking standards shall be applied to all other areas of the SDZ lands.

Site 3 is located within an **Accessibility Level 1** area, as identified in Figure 2.2.8 of the Planning Scheme. As such the Zone 2 parking standards of the County Development Plan apply to the proposed development.

We refer An Bord Pleanála to previous discussion of these car parking standards in Section 2.5, above, in this report.

The proposed development provides for 456no. surface car parking spaces. As per the requirements of the Development Plan, 100no. (c.33%) of these car parking spaces within Site 3 shall be equipped with functional EV charging points and shall be reserved for the use of battery-powered electric vehicles. The balance of the proposed car parking spaces in Site 3 will be ‘future-proofed’ through the inclusion of cables or ducting to allow the rapid future installation of additional EV charging points, as allowed by the Planning Scheme for this type of development.

We acknowledge that the Planning Scheme states that *“developments should provide charging points for the charging of electric vehicles at a rate of 100% of the car parking provision”*. We note that SDCC, as planning authority, has not been imposing this provision within the SDZ area and instead considers the Development Plan requirement for 20% to be generally appropriate. This approach has been adopted by SDCC in recent precedent cases in the Planning Scheme area, including SDZ24A/0033W, SDZ23A/0004 and SDZ23A/0018.

Based on the above precedents, noting that a significant quantum (33%) of EV parking is proposed and that the balance of all car parking spaces will be ‘future-proofed’ through the inclusion of cables or ducting to allow the rapid future installation of additional EV charging points, we consider the proposal to be broadly consistent with the EV parking objectives of the Planning Scheme. We note here that any potential contravention is not material.

In addition, 22no. spaces (5%) are provided for accessible parking spaces.

We refer the Board to the Traffic & Transport Assessment and Residential Travel Plan, prepared by DBFL Consulting Engineers for further discussion in relation to proposed car parking provision.

Figure 2.2.8 | Accessibility Levels for Identification of Car Parking Zones

Source: Clonburris Strategic Development Zone Transport Assessment and Strategy (2017)

Figure 13: Extract from Figure 2.2.8 Accessibility Level of the Planning Scheme of the Planning Scheme with application site indicatively outlined in orange (Overlay by SLA).

In accordance with **Section 2.8.10** of the Planning Scheme, parking has been carefully designed not to dominate streetscapes and to integrate seamlessly into the public realm. As per the requirements of the Planning Scheme, the number of spaces per car parking bay is limited to three parallel spaces and six perpendicular spaces.

3.2.3 Bicycle Parking

Section 2.2.6 of the Planning Scheme states: -

“The minimum parking standards for the SDZ lands are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme.”

We refer the Board to Section 2.6 of this Report which confirms compliance with the Development Plan bicycle parking requirements.

The minimum standards set out in Table 13.24 of the Development Plan relate to apartments / duplexes and reflect the standards prescribed in the Apartment Guidelines.

The proposed development provides 1,116no. bicycle parking spaces, consisting of 882no. long stay and 234no. short stay spaces. In accordance with the requirements of the Planning Scheme, 23no. electric cycle spaces are provided.

We refer the Board to the Traffic & Transport Assessment and Mobility Management Plan, prepared by DBFL Consulting Engineers for further discussion in relation to bicycle parking provision.

3.2.4 Transport Assessment

Section 2.2.7 of the Planning Scheme states: -

“Transport and Traffic Assessments (TTAs) should be carried out on a case by case basis for developments that have the potential to generate a significant increase in trips on the overall transport network.”

We refer the Board to the Transport and Traffic Assessment, prepared by DBFL Consulting Engineers, in relation to the likely impact of the proposed Site 3 scheme on street traffic and vehicle parking needs.

3.2.5 Mobility Management Plan

Section 2.2.7 of the Planning Scheme states: -

“Individual MMPs or Workplace Travel Plans (WTP) should also accompany applications for larger sized developments in accordance with the recommendations of the NTA’s Achieving Effective Workplace Travel Plans: Guidance for Local Authorities (2012).”

We refer the Board to the Residential Travel Plan, prepared by DBFL Consulting Engineers, in relation to the proposed residential development’s measures to encourage sustainable travel modes and reduce car borne traffic within the Site 3 scheme.

3.3 Green and Blue Infrastructure

It is an overarching principle of the Planning Scheme to: -

“Deliver a network of high quality green and blue infrastructure spaces and public parks while protecting, enhancing and sensitively upgrading the natural, built and cultural assets of Clonburris lands.”

Some of the **Key Principles** for green and blue infrastructure in the Planning Scheme that relate to the proposed development are as follows: -

- To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.
- To retain and improve key landscape and ecological features such as hedgerows, the Grand Canal and the Griffeen River.
- To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems.
- To seek to retain hedgerows, aquatic habitats and established tree lines wherever possible.

The proposed landscape scheme is a key component of the integration of the new building environment with the existing and permitted landscape conditions. The key landscape features to support green infrastructure include: -

- A range of public amenity spaces are available to allow prospective residents to avail of opportunities for passive and active recreation.
- The design of local and intimate streets will enhance permeability and quality of facilities for pedestrian and cyclists, encouraging active travel through the proposed development and to adjacent amenity areas.
- Proposed open space and green infrastructure network consisting of a series of bio-diverse, multi-functional open spaces connected by coherent, integrated and evolving green links that facilitate biodiversity corridors.

We refer the Board to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Doyle & O’Troithigh Landscape Architects for further detail on the landscaping proposals within Site 3.

We refer also the to the overall Tree Survey and Planning Report and associated Arborist Drawings, prepared by John Morris Arboricultural Consultancy that are enclosed with this planning application.

For the overarching landscape scheme for the wider Part 10 proposal, which Site 3 is integrated with, we refer to the plans and particulars prepared by Doyle & O'Troithigh Landscape Architects

The proposed development has been designed to be consistent with **Figure 2.3.1 – Green Infrastructure Network** of the Planning Scheme.

Figure 2.3.1 | Green Infrastructure



Figure 14: Extract from Figure 2.3.1 Green Infrastructure Network of the planning Scheme with Site 3 site outlined indicatively in orange (Overlay by SLA).

3.3.1 Sustainable Urban Drainage

Section 2.3.2 of the Planning Scheme states: -

"It is essential that open spaces accommodating SUDS measures such as attenuation ponds, shall be designed in order to achieve a balance between surface water management and high quality open space."

The key elements of the proposed SUDS measures are as follows:

- *The SUDs shall be designed into the street, public squares and open space network, as a series of 'wet' and 'dry' landscape elements. These should be of a high quality to achieve a multifunctional space for amenity, biodiversity and surface water management and should include grasses and swales, and high quality, well designed attenuation ponds and constructed wetlands.*
- *A system of infiltration trenches, tree pits, permeable paving green roofs, and other elements shall be provided that should direct surface water to attenuation areas.*
- *Swales should be designed as linear landscape elements and used as elements to enhance streetscape and neighbourhood character and identity.*
- *Surface water should be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units."*

As presented within the engineering pack prepared by DBFL Consulting Engineers and landscaping pack prepared by Doyle & O'Troithigh Landscape Architects, SuDs features incorporated in the proposed Site 3 development include permeable paving, bio-retention systems/raingardens, roadside swales and green roofs. This is in line with the requirements of the Planning Scheme.

3.4 Built Form and Design

3.4.1 Design Criteria

Section 2.8.2 of the Planning Scheme states: -

“To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ retail services development) shall be accompanied by a Design Rationale...”

We refer the Board to the Design Rationale, prepared by O’ Mahony Pike Architects, for further detail in respect of the architectural coherency and quality of the proposed design of the Site 3 development, having regard to the design criteria of the Planning Scheme.

We provide a high level summary of the key design criteria, inclusive of Block Size and Form, Building Centre Line and Urban Grain, Building Height and Movement Strategy in the sections below.

3.4.2 Block Size and Form

Section 2.8.3 of the Planning Scheme states: -

“Development across the SDZ lands shall be shaped and defined by the street network prescribed under the Movement and Transport section of this Planning Scheme (Section 2.2) and shall be divided into a series of blocks that present strong building frontages to surrounding streets especially at corners.”

As outlined previously, in Section 3.2.1 of this report, the proposed Site 3 street network is aligned with the fixed link streets (existing Adamstown Avenue arterial street and permitted North Link Street). It is also consistent with the layout of the indicative local and intimate streets, and the design of priority and non-priority junctions. The proposed development has due regard to the typology, primacy, alignment and design speed further specified in Table 2.2.1 of the Planning Scheme.

In summary, this identified certain necessary departures from the detail of the streets and building lines diagrams of the Planning Scheme, to address:

- The existing ESB 38kv Balgaddy Station affecting junction functionality along existing Adamstown Avenue and the North Link Street.
- Adjustment of building lines along the eastern edge of the site to existing strategic gas and watermain infrastructure that cannot be relocated.
- Adjustment of the indicative local streets in the area of the existing ESB station.
- Adjustment of ‘Proposed Intimate Street’ connections with the Griffeen housing area to the north.

3.4.3 Building Centre Line and Urban Grain

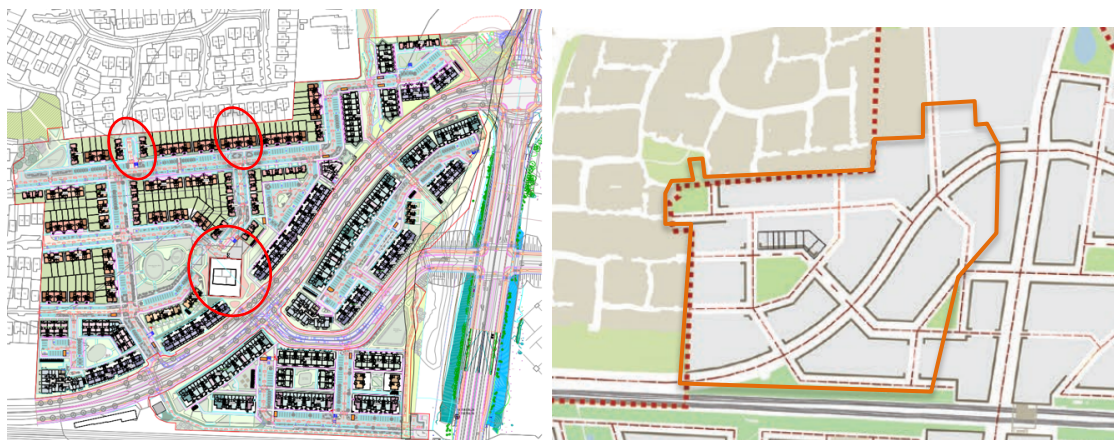


Figure 15: Site 3 layout compared to extract from **Figure 2.8.5** of the SDZ Planning Scheme showing fixed urban design requirements (building lines, centre lines, parks/squares and urban grain). Red circles indicate minor departure from fixed line detail, due to need to respond to existing strategic infrastructure (site constraints).

It is highlighted that the **ESB 38kv Balgaddy Station** is a significant existing strategic site constraint towards the centre of Site 3.

It is necessary to depart from the detail of fixed building lines and road centre lines at the locations within the Kishoge Character Area site plan, as represented in Figure 2.8.5 (which is an indicative diagram rather than a scaled map), in order to:

- retain existing public infrastructure and wayleaves of regional significance in the centre and along the eastern edge of Site 3, and
- allow the proposal to better integrate with the existing Oldbridge Grove development to the north west of Site 3.

We refer to the DBFL Consulting Engineers Input for further information in regard to these proposals.

In seeking to positively address the site constraints posed by existing strategic public infrastructure, the proposed Site 3 plan integrates the undevelopable service corridor areas as green infrastructure spaces and links, which connect the proposed residential development and associated services/utilities with the surrounding existing housing and existing and permitted school sites. This ensures a sustainable, well-connected, permeable neighbourhood with accessible and usable green open space amenity.

The 'Proposed Intimate Street' in the north western section of the site has been proposed as a potential future connection to Oldbridge Court, only slightly further west than the location identified within Figure 2.2.7 of the Planning Scheme. The 'Proposed Intimate Street' at this location will help enable links to the existing Griffeen community in accordance with the key objectives for the Kishoge North West Development Area. Table 2.2.1 - Street Hierarchy, Alignment and Speed of the Clonburris Planning Scheme instructs that Local Streets (Internal Local Streets & Homezones/Intimate Local Streets) are flexible in terms of their alignment and centre line.

As per the requirements of the Planning Scheme, fine urban grain has been provided to the north of the central park within the Site 3 site. This is required to *"provide for physical, visual and land use diversity in contrast to the predominant coarse grain"*. At this location, dutch-billy roof profiles are proposed to narrow frontage housing to give a striking and unique surrounding to the park. We refer the Board to the Architects Design Statement prepared by O'Mahony Pike Architecture for further illustration and description of how fine urban grain is achieved, in accordance with the Planning Scheme diagram, in Site 3.

3.4.4 Building Height

Prescribed building heights are set out for each subsector and Development Area within the Clonburris SDZ Planning Scheme.

The Planning Scheme confirms that general building heights are outlined in Figure 2.8.10, whilst more detailed requirements are set out in Section 3 – Development Areas.

Site 3 is located primarily within Development Area 7 – Kishoge North West, and including all or part of Sub Sectors KNW-S1, KNW-S2, KNW-S3. A small portion of the development is located within Development Area 6 – Kishoge Urban Centre, including part of Sub Sector KUC-S1.

The prescribed height for Sub Sectors KNW-S1, KNW-S2, KNW-S3 is **2-6 storeys**, whilst Sub Sector KUC-S1 has a prescribed height range of **3-8 storeys**. The Planning Scheme diagram provides an indication of how building height might be achieved to ensure appropriate frontage to fixed streets and strategic open space. However, the planning authority has confirmed that the building height for the subsectors is prescribed by Tables 3.3.6 and 3.3.7 and that the diagram is indicative.



Figure 16: Extract from **Figure 3.3.2** of the Clonburris SDZ Planning Scheme identifying Building Height Concept. Approximate Site 3 area in black (SLA Overlay)

The proposed building heights within Site 3 are consistent with the building height range of 2-6 storeys for the relevant sub sectors, as confirmed in Table 3.3.7 for Kishoge North West Sub Sectors KNW-S1, KNW-S2, KNW-S3 and 3-8 storeys as per Table 3.3.6 for Kishoge Urban Centre Sub Sector KUC-S1.

Building height will also be generally consistent with Figure 3.3.2 of the Planning Scheme, in seeking to present:

- a robust edge to Adamstown Avenue ('existing arterial route'), the permitted North Link Street and planned Kishoge Urban Centre;
- an appropriate urban frontage to the connecting 'local streets' to the public park and railway corridor; and,
- more modest height along the 'intimate local streets' and transitional areas to existing neighbouring housing to the north and west.

We refer the Board to the enclosed plans and particulars prepared by O'Mahony Pike Architects for further design detail.

3.5 Services and Infrastructure

3.5.1 Water Supply

The strategic objectives for the delivery of water services are set out by the Water Services Strategic Plan (WSSP) by Irish Water up to 2040. At a local level, SDCC manages aspects of the water supply and foul drainage networks.

The Planning Scheme notes that capacity in the surrounding water supply network is "*generally sufficient*" to supply the SDZ lands, and that the projected population of Clonburris has been taken into account by Irish Water in their planning for the Greater Dublin Area.

The enclosed Infrastructure Design Report prepared by DBFL Consulting Engineers confirms,

"The watermains of the subject site will connect into the NLS trunk watermain infrastructure and the existing watermain infrastructure within Adamstown Avenue, creating three separate 180mm primary watermain loops serving the proposed development site. The 180mm loops within the subject site will then feed smaller 125mm distribution watermains. The connection to the public water main will include

a metered connection with sluice valve arrangement in accordance with the requirements of Irish Water. Individual houses will have their own connections to the distribution main via service connections and boundary boxes. Individual service boundary boxes will be of the type to suit Irish Water and to facilitate domestic meter installation. Hydrants are provided for firefighting at locations to ensure that each dwelling is within the required Building Regulations distance of a hydrant. The development's proposed water-main distribution system is shown on drawing SITE 3-DBFL-93- XX-DR-C-1351."

We refer the Board to the Statement of Design Acceptance, in respect of the proposed development, which demonstrates compliance with Irish Water Standards.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for water supply.

We refer to the Engineering Pack prepared by DBFL Consulting Engineers for further information in this regard.

3.5.2 Foul Water Drainage

The Planning Scheme notes that wastewater infrastructure development within the SDZ must align with Irish Water's Strategic Network Development Plans for the SDZ.

The enclosed Infrastructure Design Report prepared by DBFL Consulting Engineers confirms,

"The overall SDZ site has been divided into 7 separate foul water catchments (refer to Table 4.1 & Figure 4.1), where the subject site is within Catchment W. The proposed site will benefit from foul infrastructure proposed as part of NLS. Trunk foul sewer network has been designed as part of the NLS to serve the subject site based on the average net density for Catchment W, ranging from the "Low Margin" to a "High Margin. Foul water has been split into 2 no. separate sub-catchments for the subject site. It is proposed that the foul water generated in Kishoge Site 3 sub-catchment A will discharge into the existing Oldbridge foul outfall to the northwest of the proposed site. Foul water from Kishoge Site 3 sub-catchment B will be collected by sewers to be constructed as part of NLS works, discharged via gravity towards pumping station 3 (to the northeast of the site) and pumped east where it eventually discharges at the existing 9B trunk sewer on R113 Fonthill Road."

We refer to the Engineering Pack prepared by DBFL Consulting Engineers for further information in this regard.

3.5.3 Surface Water Drainage

A Surface Water Strategy (SWS) was carried out in respect of the Planning Scheme and forms part of the accompanying documents to the Planning Scheme.

The key principles of surface water management outlined in the Surface Water Strategy (SWS) accompanying the Planning Scheme are as follows: -

- Manage surface water runoff at source in order to prevent or reduce surface water flows.
- Manage water on the surface to intercept flows and direct them to areas designed to treat, store and discharge flows away from residential dwellings, businesses, and transportation networks, where disruption and flooding could occur.
- Develop a high quality SuDS integrated within public realm and public open space where feasible, to provide high quality and attractive 'green and blue' corridors, features and focal points with the SDZ landscape, which can also enhance local amenity, ecology and biodiversity.
- Effective operation and maintenance of SuDS measures, to ensure that such systems are operating to their designed capacity.
- Account for climate change and any changes to the amount of impermeable areas over the design life of the development, in accordance with the GSDS.

The Sustainable Urban Drainage Strategy (SuDS) strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed include the following: -

- Permeable paving.
- Tree Pits
- Bio-retention Areas / Rain Gardens

The SuDS measures proposed have been co-ordinated with the landscaping scheme presented by Doyle & O'Troithigh Landscape Architects

We refer to the Engineering Pack prepared by DBFL Consulting Engineers for further information in this regard.

3.5.4 Flood Risk Assessment

We refer to the Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers for Site 3. This concludes,

"The (Stage 1) Flood Risk Identification determined that the site is not likely to be impacted by future flood events. Although a number of past flood events occurred within a 2.5km radius, there were no historical flood events recorded within the proposed development site. CFRAM maps show that the proposed development site is not likely to be impacted by fluvial or coastal flooding.

The (Stage 2) Initial Flood Risk Assessment determined that there are no significant potential flood sources that may affect the proposed development site. Therefore, the proposed development site is categorised as 'Flood Zone C'. Due to the existing ESB substation, the proposed development is classified as a 'Highly Vulnerable Development'. Although there was no need for further justification, a detailed assessment was carried out.

The (Stage 3) Detailed Flood Risk Assessment analysed the potential risk of flooding regarding the existing ESB substation and the proposed adjacent attenuation pond. The detailed assessment concluded that the existing ESB substation is not at risk from flooding. The proposed adjacent attenuation pond is designed to have a top water level of 56.363m AOD (For a 1% AEP storm) and a top of bank level of 56.80m. This top of water level of the attenuation pond is over 0.5m lower than the ESB substation level of 56.90m. An overland flood route will direct any excess surface water away from the ESB substation towards the northwest of the site."

3.5.5 Energy and Efficiency

The planning scheme identifies that the construction of new homes is required to comply with Building Regulations Part L.

A Climate Action and Energy Statement prepared by MANDE Consulting Engineers is enclosed with this planning application.

3.5.6 Waste Management

The Planning Scheme notes that waste and recycling needs to be fully considered and implemented in design, construction and operational phases of development.

We refer the Board to the Resource Waste Management Plan and the Operational Waste Management Plan prepared by AWN Consulting which detail how waste will be managed during construction and operation of the proposed development.

3.5.7 Noise

The Planning Scheme confirms that development proposals shall have regard to the Dublin Agglomeration Environmental Noise Action Plan 2013-2018, with particular regard to development adjacent to major road and rail transport corridors. This is with a view to reducing noise from new sources and to identify and protect potentially vulnerable areas of low sound levels.

We refer to the Noise and Vibration Chapter of the Environmental Impact Assessment Report, prepared by AWN Consulting enclosed with this application.

3.5.8 Construction Environmental Management Plans

The Planning Scheme requires that a Construction Environmental Management Plan (CEMP) is to be developed prior to the initiation of the physical components outlined in the Planning Scheme, and the mitigation of same will be executed throughout the project.

We refer to the enclosed Construction Environmental Management Plan, prepared by DBFL Consulting Engineers.

3.6 Landscape and Open Spaces

3.6.1 Open Space

Figure 2.10.1 of the Planning Scheme provides an indicative layout of the hierarchy of existing and proposed parks on the lands.

Figure 2.10.1 | Open Space

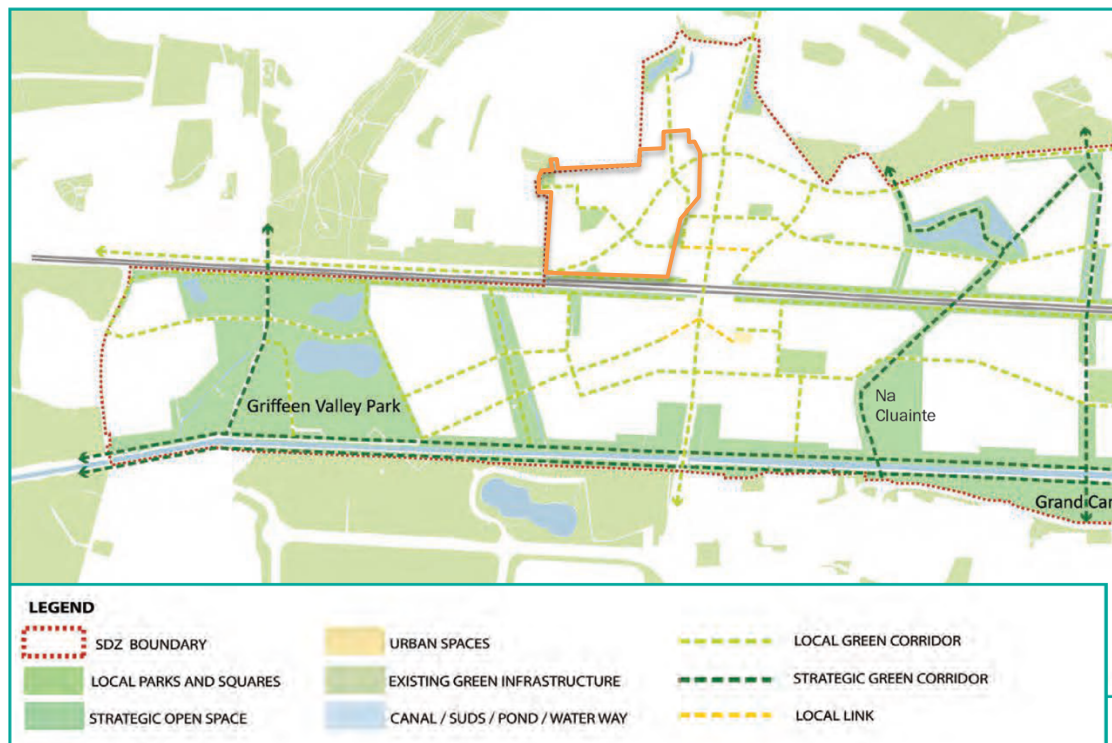


Figure 17: Extract from Figure 2.10.1 Open Space of the Planning Scheme with Site 3 outlined indicatively in orange (Overlay by SLA).

The Planning Scheme states that:

“The proposed open spaces represent important interfaces between existing and proposed neighbourhoods. Key requirements for these open spaces shall include pedestrian and cyclist connectivity through and between the parks, adjacent neighbourhoods and public transport.”

It is essential that the edge of the open spaces and central walkways are designed to be well lit, well overlooked, legible and accessible. In addition, it is a key requirement that the amenity of existing landscape assets within the proposed parks, including the Grand Canal, habitats and historic features are enhanced and where appropriate, integrated into the landscape structure.

The main active outdoor recreation facilities will largely be accommodated in the three main parks on the SDZ lands: the extension to Griffeen Valley Park, Grand Canal Park and Na Cluainte Park. The facilities in the main parks will be complemented by local play facilities including full size playing pitches, to be provided in the local open spaces."

We refer to the enclosed Landscaping pack prepared by Doyle & O'Troithigh Landscape Architecture for detail on the proposed landscape strategy.



Figure 18: Extract from Site 3 Landscape Plan prepared by Doyle & O'Troithigh Landscape Architecture

3.7 Biodiversity and Natural Heritage

Key principles for Biodiversity and Natural Heritage in the Planning Scheme which relate to the proposed development are as follows: -

- To seek to protect and enhance natural, built and cultural heritage features, where appropriate, such as the Grand Canal, streams, Protected Structures and barony and townland boundary hedgerows.
- To avoid or minimise the impact on protected species and their habitats.
- Incorporate biodiversity and heritage into new developments.

The key features of relevance to the Site 3 proposal are outlined below.

3.7.1 Ecological Corridors

The Planning Scheme notes that there are three primary ecological corridors on the lands comprising the Grand Canal and associated towpath, Griffeen River and along the railway line.

The railway corridor lies along the southern boundary of Site 3. A strategic green corridor to the railway corridor is to be proposed, ensuring the protection of an enriched biodiversity.

Site 3 being located north of the existing rail line, is located at some remove from the Grand Canal.

3.7.2 Hedgerows

There are over 30km of hedgerows that must be protected across the SDZ lands. Section 2.11.2 of the Planning states that: -

“The hedgerow / treeline habitat linking the Grand Canal Corridor and the Rail Corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats.”

We refer the Board to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Doyle & O'Troithigh Landscape Architecture, as well as to the arborist drawings John Morris Arboricultural Consultancy and reports prepared by for further detail.

3.7.3 Street Trees

The Planning Scheme provides that street trees should be considered an integral part of the street environment, in accordance with DMURS. Trees should be planted in medians, verges and build outs. Tree planting should be at frequent intervals, particularly where it can soften the impact of on-street parking. Larger tree species should be planted along all arterial and link streets.

Within the proposed local streets in Site 3, street trees are incorporated to provide green links and vistas to the adjacent open spaces. They will contribute to the sense of enclosure, act as a buffer to traffic pollution and enhance the quality of the space.

We refer the Board to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Doyle & O'Troithigh Landscape Architecture for further detail.

3.8 Archaeological Heritage and Architectural Heritage

It is an overarching principle of the planning scheme: -

“To retain and enhance architectural heritage and archaeological heritage features, sites and structures within the SDZ lands by encouraging conservation and incorporation including adaptive re-use, where appropriate, within the built fabric and landscape of the SDZ Lands.”

There are no Protected Structures or Heritage Structures located at Site 3.

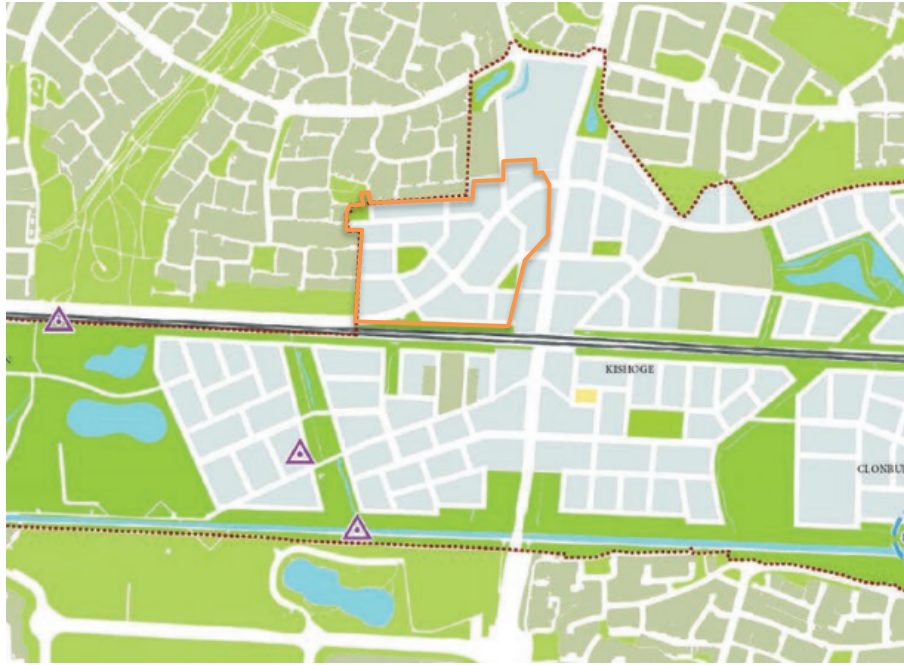


Figure 19: Extract from Figure 2.12.1 Archaeological and Architectural Heritage Concept of the Planning Scheme with the SITE 3 site outlined in orange Overlay by SLA).

We refer to the Cultural Heritage (Architectural & Archaeological) Chapter of the Environmental Impact Assessment Report enclosed with this application, providing detail on site investigations performed, as well as detail on the Archaeological Heritage and Architectural Heritage of the overall Part 10 Application Site.

13 SITE 4 STATEMENT OF CONSISTENCY- CLONBURRIS SDZ PLANNING SCHEME

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1 SITE 4 - STATEMENT OF CONSISTENCY

This section provides a planning consistency review of the proposed development at Site 4 of the wider Part 10 application site, primarily against the relevant development objectives and standards of the Clonburris Strategic Development Zone (SDZ) Planning Scheme 2019.

However, we commence with a short review of the South Dublin County Development Plan 2022-2028, for strategic planning policy context. And also, to identify relevant development plan standards, where there is no equivalent standard contained in the Clonburris SDZ Planning Scheme.

Where applicable, we will refer to relevant Section 28 Ministerial Guidelines. However, we acknowledge that the objectives or Specific Planning Policy Requirements (SPPRs) of Ministerial Guidelines do not supersede the objectives or development standards contained in the adopted Clonburris SDZ Planning Scheme, unless it has been subject of Variation to take such SPPRs into account.

2 SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028

The application site is located within the designated Clonburris Strategic Development Zone. Section 169(9) of the Planning & Development Act 2000, as amended ("the Act") reads as follows: -

"A Planning scheme made under this section shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded."

As such, the Clonburris SDZ Planning Scheme 2019 is the principal planning document of relevance to the planning assessment of the site. We refer to Section 3 of this planning report, below, which examines the consistency of the proposed development at Site 4 with the Clonburris SDZ Planning Scheme.

Any relevant, complementary objectives or standards contained in the Development Plan applicable within the SDZ, are discussed in the section below.

2.1 Core Strategy and Settlement Strategy

Under the Core Strategy of the County Development Plan, the lands at Clonburris are subject of an approved SDZ Planning Scheme (2019). The Clonburris SDZ Planning Scheme area will accommodate a major residential-led expansion of Clondalkin to the west, along the Dublin-Cork rail corridor.

CS Objective 4 states: -

"To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs."

Section 2.7.1 of the Core Strategy states: -

"Lands at Clonburris have an approved SDZ Planning Scheme (2019) and represent a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor. The Council will continue to actively promote the delivery of sufficient public transport and road capacity, in tandem with future development of the SDZ. In this regard, significant funding has been achieved through the URDF to provide infrastructure to facilitate early development during the lifetime of the Development Plan."

The Core Strategy identifies that the delivery of planned compact growth and development is a priority for the Council.

The proposed development at Site 4 is consistent with the delivery of the strategic expansion of new residential-led development to the west of Clondalkin, along the Dublin-Cork rail corridor, within the Clonburris SDZ Planning Scheme area.

2.2 Land Use Zoning

Site 4 is zoned 'SDZ' in the County Development Plan. As noted, it forms part of the designated Clonburris Strategic Development Zone (SDZ), with the objective:

"To provide for strategic development in accordance with approved planning schemes."

The approved Clonburris SDZ Planning Scheme (2019) sets out the site specific land use objectives for Site 4. We refer An Bord Pleanála to Section 3.1 of this Report, below, which confirms how the proposed development is consistent with the specific land use objectives of the Planning Scheme.

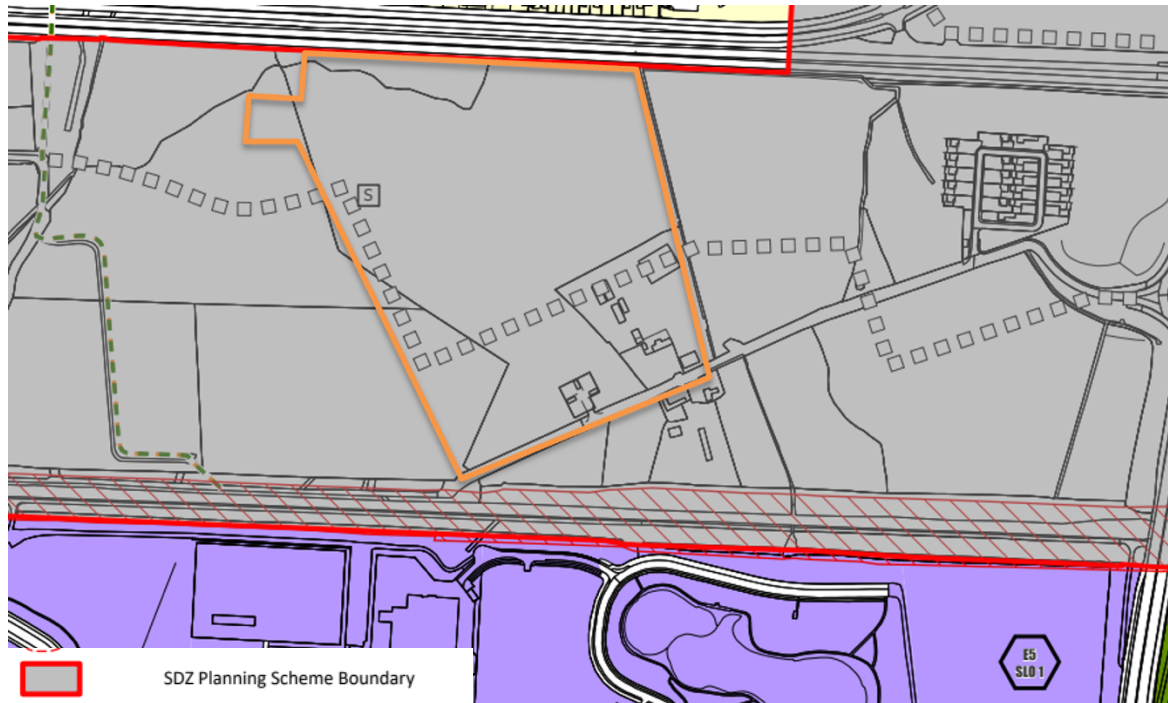


Figure 1: Extract from Land Use Zoning Map B of the South Dublin Development Plan 2022-2028 with the application site SITE 4 outlined indicatively in orange (Overlay by SLA).

2.3 Green Infrastructure

South Dublin has a number of Strategic Green Infrastructure Corridors. The Clonburris lands fall within Strategic Corridor 3, the **Grand Canal Corridor**. The Grand Canal is a key national Green Infrastructure feature, acting as a major ecological and recreational link between the River Shannon in the midlands and Dublin City where the canal enters the sea.

Policy NCBH9: Grand Canal seeks to:

*"Protect and promote the Grand Canal as a key component of the County's **Green Infrastructure and ecosystem services network**, and protect and enhance the visual, recreational, environmental, ecological, industrial heritage and amenity value of the Grand Canal, recognising its sensitivities as a **proposed Natural Heritage Area** with adjacent wetlands and associated habitats."*

The following objectives are also relevant to the proposed development:

NCBH9 Objective 3:

*"To ensure that development along or adjacent to the Grand Canal contributes to the creation of an integrated network of appropriately designed **walking and cycling routes** connecting with the **Grand Canal Way Green Route** and which takes due cognisance of the sensitive nature of this **national ecological corridor**."*

NCB9 Objective 4:

*“To ensure that development along and adjacent to the Grand Canal protects and **incorporates natural heritage features** including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches and includes an appropriate set-back distance or **buffer** area from the pNHA boundary to facilitate protected species and biodiversity and a **fully functioning Green Infrastructure network**.”*

*“To ensure that all development proposals along the Grand Canal are accompanied by an **EclA (ecological impact assessment)** prepared by a qualified ecologist and that the recommendations of the EclA are incorporated into any development proposals including a **landscape plan** prepared by a qualified landscape architect. Where new canal crossings (that is, footbridges / cycle bridges) are proposed, they should be designed so as to avoid fragmentation of linear habitat associated with the Grand Canal.”*

[SLA bold font emphasis]

The majority of Site 4 is at a remove from the Grand Canal corridor, with only its southern most corner lying within the ecological buffer zone.

The Planning Scheme states that development (with the exception of footpaths and bridges) is required to maintain a 30m set back distance from the boundary of the pNHA. Within Site 4, all buildings adhere to the 50m setback, in accordance with the requirements of the Planning Scheme. There is only some slight encroachment of landscaping, roads, footpaths and car parking treatments included within the 30-50m buffer zone, as allowed for by the Planning Scheme.

The proposed development at Site 4 has been designed to ensure that development does not significantly encroach on the Grand Canal ecological corridor, while still providing for appropriate pedestrian and cycle connections to the Grand Canal Way Greenway.

The proposed development has been designed to respect and protect the ecological sensitivity of the Grand Canal. We refer An Bord Pleanála to the Site 4 site layout plan, prepared by DTA Architects, and to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Bernard Seymour Landscape Architects, which have taken account of the advice and direction of qualified ecologists Altamar Environmental Consultants and JBA Consulting, in this respect. We refer also to the Ecological Impact Assessment Report (EclA), prepared by JBA Consulting, and to the Biodiversity Chapter of the Environmental Impact Assessment Report (EIAR), prepared by JBA Consulting, for the relevant assessments.

2.4 Housing

It is identified in Chapter 6 that the planned growth for the 6 year Development Plan period to 2028, comprising 93% of new homes within the Dublin City and Suburbs settlement, will be achieved through the re-use, infill and consolidation of existing urban areas and sustainable intensification along public transport networks, at the ‘REGEN’ zoned lands, the Adamstown and Clonburris SDZs, and the new district at Fortunestown.

The proposed development is consistent with the promotion of consolidation and intensification of development within the Clonburris SDZ and along the rail corridor. It will make a positive contribution towards meeting the specific residential growth target (9,416no. units) within the Clonburris SDZ Planning Scheme development boundary, through the proposed provision of 436no. residential units and supporting uses and facilities within the Clonburris SDZ. It is also consistent with the specific housing allocation for this development tile within the SDZ planning scheme, as discussed further in Section 3 of this report, below.

H1 Objective 12, relating to housing typology, requires that: -

“Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:

- *there are unique site constraints that would prevent such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*

- *the scheme is a social and / or affordable housing scheme.*

Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines)."

In accordance with H1 Objective 12, the proposed residential development at Site 4 will provide:

- 65no. 1 bed units (14.9%)
- 177no. 2 bed units (40.6%)
- **186no. 3 bed units (42.7%)**
- 8no. 4 bed units (1.8%)

Policy H7, promotes **high quality** residential development. It states: -

"Promote high quality design and layout in new residential developments 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."

Policy H8, relating to **public amenity open space**, seeks to: -

"Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area."

Policy H9, relating to **private open space**, seeks to: -

"Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments."

The proposed development is of a high-quality design, being consistent with all relevant residential amenity standards, including public and private open space, discussed primarily in relation to the Clonburris SDZ Planning Scheme, in Section 3 below.

We refer the Planning Authority to the overarching Part 10 architectural rationale provided in the Architects Design Statement, prepared by O'Mahony Pike Architects. We refer also to the Site 4 specific architectural plans and design rationale prepared by DTA Architects.

For public open space and landscape design we refer the Planning Authority to the overarching Part 10 landscape design rationale provided by Doyle & O'Troithigh Landscape Architects. We refer also to the Site 4 specific landscape architecture plans and design rationale prepared by Bernard Seymour Landscape Architects.

2.5 Car Parking Standards

Section 12.7.4 of the Development Plan, relating to Car Parking Standards, sets out the maximum parking rates for residential and non-residential development. Parking rates set out within the Development Plan are divided into two main categories depending on the proximity of the proposed development to nearby amenities or to public transport infrastructure:

- *"Zone 1: General rate applicable throughout the County;*
- **Zone 2 (Non Residential):** *More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction).*
- **Zone 2 (Residential):** *More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 400-500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service)."*

As confirmed within the Clonburris SDZ Planning Scheme (see Section 3.2 below), the Site 4 is ascribed an 'accessibility level' of 1, where the **Zone 2** parking standards of the Development Plan apply.

2.5.1 Proposed Residential Car Parking

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Figure 2: Extract from **Table 12.26** - Maximum Parking Rates (Residential Development) of the South Dublin Development Plan 2022-2028

We refer the Board to the following table of proposed car parking, extracted from the 'Traffic and Transportation Report' prepared by Cronin Sutton Consulting Engineers. This demonstrates the consistency of the proposed residential development at Site 4 with the Table 12.26 maximum residential car parking standards of the County Development Plan for Zone 2 lands:

Table 4 – Car Parking Residential Development (Zone 2)				
Dwelling Type	Maximum Standard	Quantum	Maximum Car Parking Provision	Car Parking Proposed
Apartment/Duplex	0.75 space per 1-bed	65 no.	49no. spaces	36no. spaces
	1 space per 2-bed	177no.	177no. spaces	135no. spaces
	1.25 space per 3-bed+	53no.	66no. spaces	53no. spaces
Subtotal		295no.	292no. spaces	224no. spaces
House	1 space per 1-bed	-	-	-
	1.25 spaces per 2-bed	-	-	-
	1.5 spaces per 3-bed +	141no.	212no. spaces	160no. spaces
Subtotal		141no.	212no. spaces	160no. spaces
Total		436no.	504no. spaces	384no. spaces

Figure 3: Extract from Table 4 of the Traffic and Transportation Report prepared by Cronin Sutton Consulting Engineers identifying car parking provision for residential development

2.5.2 Proposed Non-Residential Car Parking

Category	Land-Use	Zone 1	Zone 2
Education	College of Higher Education	1 per staff plus 1 per 15 students	1 per 2 staff plus 1 per 30 students
	Crèche School ⁹	1 per classroom	0.5 per classroom
Retail and Retail Service	Café Restaurant	1 per 15 sq m GFA	1 per 20 sq m GFA
	Bar Club ¹⁰	1 per 30 sq m	1 per 40 sq m
	Retail Convenience	1 per 15 sq m	1 per 25 sq m
	Retail Comparison	1 per 25 sq m	1 per 35 sq m
	Retail Warehousing	1 per 50 sq m	1 per 50 sq m
	Vehicle Service Station	1 per 250 sq m GFA	1 per 250 sq m GFA
Enterprise and Employment	Offices ¹¹	1 per 50 sq m GFA	1 per 75 sq m GFA
	Warehousing	1 per 100 sq m GFA	1 per 200 sq m GFA

Figure 4: Extract from Table 12.26 - Maximum Parking Rates (Non -Residential Development) of the South Dublin Development Plan 2022-2028. The Application Site lies within Zone 2.

We refer the Board to the following table of proposed car parking, extracted from the 'Traffic and Transportation Report' prepared by Cronin Sutton Consulting Engineers. This demonstrates the consistency of the proposed residential development at Site 4 with the Table 12.26 maximum non-residential car parking standards of the County Development Plan for Zone 2:

Table 5 – Car Parking Non-residential Development (Zone 2)				
Land Use Type	Maximum Standard	Quantum	Car Parking Required	Car Parking Proposed
Retail	1 space per 25 sqm	150sqm	6no. spaces	5no. spaces
Employment	1 space per 75 sqm	200sqm	3no. spaces	2no. spaces
Community	1 space per 50sqm	600sqm	12no. spaces	9no. spaces
Creche	0.5 spaces per classroom	20 classrooms	10no. spaces	8no. spaces
Total			31no. spaces	24no. spaces

Figure 5: Extract from Table 5 of the Traffic and Transportation Report prepared by Cronin Sutton Consulting Engineers identifying car parking provision for non-residential development

The Development Plan states that the number of car parking spaces provided for any particular development should not exceed the maximum provision. It however also stated that: -

*"The maximum parking standards **may also be varied** in particular areas by the Planning Authority through planning mechanisms such as **SDZ Planning Schemes**, Local Area Plans or Movement Framework Plans and Area Access Studies."*

[SLA bold font emphasis]

Section 12.7.5 of the Development Plan, relating to the promotion of **electric vehicle charging**, states: -

"EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas."

The proposed development provides for 409no. car parking spaces, as identified in Figures 3 and 5 above. As per the requirements of the Development Plan, 134no. (c.33%) of the total number of car parking spaces

within Site 4 shall be equipped with functional EV charging points and shall be reserved for the use of battery-powered electric vehicles.

All other car parking spaces within the development shall be ‘future-proofed’ through the inclusion of cables or ducting to allow the rapid future installation of additional EV charging points, as required by the Clonburris SDZ Planning Scheme.

We refer the Planning Authority to the Traffic & Transport Assessment and Residential Travel Plan, prepared by Cronin Sutton Consulting Engineers for further discussion in relation to car parking provision.

Further discussion in relation to car parking requirements in the context of the Planning Scheme are addressed in Section 3.2 of this Report below.

2.6 Bicycle Parking Standards

Section 12.7.1 – Bicycle Parking / Storage Standards of the Development Plan sets out the minimum bicycle parking / storage for all new developments by land-use. Bicycle parking / storage rates are divided into two main categories: -

- *Long Term: These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.*
- *Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.*

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 bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Retail and Retail Service	Café Restaurant	1 per 5 staff	1 per 10 seats
	Bar Club ²	1 per 5 staff	1 per 150 sq m GFA
	Retail Convenience	1 per 5 staff	1 per 50 sq m GFA
	Retail Comparison	1 per 5 staff	1 per 50 sq m GFA
	Retail Warehousing	1 per 5 staff	1 per 100 sq m GFA
	Vehicle Service Station	1 per 5 staff	-
	Enterprise and Employment		
Enterprise and Employment	Offices ³	1 per 200 sq m GFA	1 per 200 sq m GFA
	Warehousing	1 per 200 sq m	-
Civic, Community and Religious	Bank Community Centre Library Public Institution	1 per 5 staff	1 per 100 sq m Gross Floor Area (GFA)
	Place of Worship	-	1 per 10 seats
Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-

Figure 6: Extract from Table 12.23 – Minimum Bicycle Parking Rates of the South Dublin Development Plan 2022-2028

We refer the Board to the following tables relating to proposed bicycle parking for the proposed development at Site 4, extracted from the 'Traffic and Transportation Report' prepared by Cronin Sutton Consulting Engineers. This demonstrates the consistency of the proposed development with the long and short stay bicycle parking standards of the County Development Plan or Apartment Design Guidelines for Planning Authorities (2023), as applicable:

Table 8 – Cycle Parking Standards - Residential and Non-residential Development		
Category	Long-term	Short-term
Apartments/Duplexes	1 per bedroom	1 per 2 apartments
Retail	1 per 5 staff	1 per 150sqm GFA
Employment	1 per 200sqm	1 per 200sqm
Community	1 per 5 staff	1 per 100sqm GFA
Creche	1 per 5 staff	1 per 10 children

Figure 7: Extract from Table 8 of the Traffic and Transportation Report prepared by Cronin Sutton Consulting Engineers identifying the applicable cycle parking requirements

Table 9 – Long-term cycle parking				
Land-use	Minimum Standard	Quantum	Minimum Cycle Parking Spaces	Long-term Cycle Parking Proposed
Residential Cycle Parking				
1-bed apartment/duplex	1 space per bedroom	65 no.	65no. spaces	65no. spaces
2-bed apartment/duplex		177no.	354no. spaces	354no. spaces
3-bed apartment/duplex		53no.	159no. spaces	159no. spaces
3-bed house	N/A	N/A	0no. spaces	0no. spaces
4-bed house		N/A	0no. spaces	0no. spaces
Subtotal		295no.	578no. spaces	578no. spaces
Non-Residential Cycle Parking				
Retail	1 per 5 staff	6 staff	1no. space	1no. space
Employment	1 per 200sqm	150sqm	1no. space	2no. space
Community	1 per 5 staff	20 staff	4no. spaces	5no. spaces
Creche	1 per 5 staff	20 staff	4no. spaces	5no. spaces
Subtotal			10no. spaces	13no. spaces
Total			588no. spaces	591no. spaces

Table 10 – Short-term cycle parking				
Land-use	Minimum Standard	Quantum	Minimum Cycle Parking Spaces	Short-term Cycle Parking Proposed
Residential Cycle Parking				
1-bed apartment/duplex	1 space per 2 units	65 no.	34no. spaces	42no. spaces
2-bed apartment/duplex		177no.	88no. spaces	108no. spaces
3-bed apartment/duplex		53no.	26no. spaces	32no. spaces
3-bed house	N/A	N/A	0no. spaces	0no. spaces
4-bed house		N/A	0no. spaces	0no. spaces
Subtotal		295no.	148no. spaces	182no. spaces
Non-Residential Cycle Parking				
Retail	1 per 150sqm GFA	150sqm	1no. space	1no. space
Employment	1 per 150sqm	150sqm	1no. space	1no. space
Community	1 per 100sqm GFA	600sqm	6no. spaces	6no. spaces
Creche	1 per 10 children	90 children	9no. spaces	12no. spaces
Subtotal			17no. spaces	20no. spaces
Total			165no. spaces	202no. spaces

Figure 8: Extract from Table 8 of the Traffic and Transportation Report prepared by Cronin Sutton Consulting Engineers identifying cycle parking provision

The minimum standards set out in Table 12.23 of the Development Plan relate to apartments / duplexes and reflect the standards prescribed in the Apartment Guidelines.

The proposed development provides 793no. bicycle parking spaces, consisting of 591no. long term and 202no. short term spaces.

We refer the Planning Authority to the Traffic & Transport Assessment and Residential Travel Plan, prepared by Cronin Consulting Engineers for further discussion in relation to bicycle parking provision.

Further discussion in relation to cycle parking requirements in the context of the Clonburris SDZ Planning Scheme is contained in Section 3.2 of this Report, below.

3 COMPLIANCE WITH CLONBURRIS STRATEGIC DEVELOPMENT ZONE PLANNING SCHEME 2019

Site 4 is subject to the Clonburris SDZ Planning Scheme 2019 ("the Planning Scheme"). The key principles, fixed objectives and standards of the Planning Scheme of relevance to the proposed development are examined below.

3.1 Land Use and Density

The Key Principles relevant to the land use and density of development at Site 4 site are identified in Section 2.1 of the Planning Scheme as follows: -

- *"To co-ordinate **residential, educational, employment and community** uses and integrate such with **transportation infrastructure** in a manner that maximises and makes efficient use of existing and planned public transport services and local facilities;*
- *To promote a **mix of uses** around the public transport nodes in a manner that creates viable and active urban centres;*
- *To promote **increased residential densities** within walking distance of public transport nodes in a manner that creates viable and active urban centres*
- *To support the development of **sustainable communities** and to ensure that new residential development is carried out in accordance with Government policy in relation to the development of housing and residential communities, catering for a **range of dwelling, types, sizes and tenure options.**"*

It is respectfully submitted that the proposed development is in accordance with the above key principles, as may be demonstrated further within this report and in the plans and particulars enclosed with the application.

Figure 2.1.2 and **Tables 2.1.1** and **2.1.3** of the Planning Scheme identify the areas zoned as 'Primarily Residential' and 'Open Space Areas' as well identifying the uses considered 'permissible' and 'open for consideration' within these land use zonings.

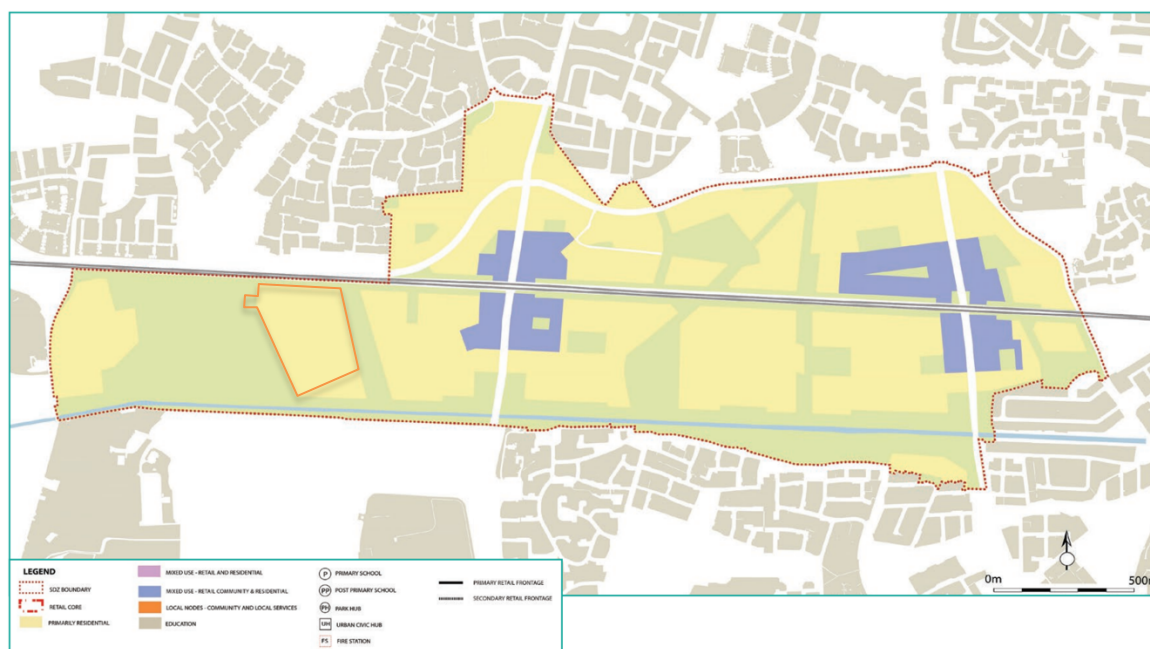


Figure 9: Land Use Area Map of the Clonburris SZD Planning Scheme, with the KGD4 site outlined indicatively in orange (Overlay by SLA).

The majority of Site 4 site is zoned as 'Primarily Residential'. A small portion at its north west corner is zoned as part of a wider 'Open Space Areas' (Griffen Valley Park to the west). The uses considered 'permissible' and 'open for consideration' under these land use zonings are identified in the tables below.

Table 2.1.1 | Uses Permissible & Open for Consideration in Residential Areas

Permitted in Principle	Bed & Breakfast, Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Guest House, Health Centre, Housing for Older People, Hotel/Hostel, Industry-Light, Live-Work Units, Nursing Home, Offices less than 100 sq.m, Open Space, Public House, Public Services, Recreational Facility, Recycling Facility, Residential Institution, Residential, Restaurant/Café, Retirement Home, Shop-Locala, Shop-Neighbourhoodb, Sports Club/Facility, Traveller Accommodation, Veterinary Surgery..
Open for Consideration	Advertisements and Advertising Structures, Agriculture, Allotments, Betting Officea, Crematorium, Garden Centre, Home Based Economic Activities, Industry-General, Motor Sales, Nightclub, Office-Based Industry, Offices 100 sq.m - 1,000 sq.m, Off-Licencea, Petrol Station, Place of Worship, Science and Technology Based Enterprise, Social Club, Stadium.

a. Local Nodes only

b. Local Nodes only and subject to SDZ Section 2.5 (Retail) convenience cap for Local Nodes

Table 2.1.3 | Uses Permissible & Open for Consideration in Open Space Areas^a

Permitted in Principle	Allotments, Cultural Use, Open Space, Recreational Facility, Sports Club/Facility.
Open for Consideration	Agriculture, Childcare Facilities, Community Centre, Education, Place of Worship Public Services, Recycling Facility, Restaurant/Café, Shop-Local, Stadium, Traveller Accommodation.

a. Subject to requirements of SDZ Section 2.11.2 (Biodiversity and Natural Heritage Features)

Figure 10: Tables 2.1.1 and 2.1.3 of the Clonburris SDZ Planning Scheme identifying uses considered permissible and open for consideration with areas zoned 'Primarily Residential' and 'Open Space Areas'

On that part of Site 4 zoned 'Primarily Residential', 436no. residential units are proposed. Also, a childcare facility (544 sq m) and a local / neighbourhood shop (c.146 sq m) are proposed in Block F, located in the western portion of the site fronting Griffen Valley Park. Employment use is proposed for the existing Grange House (c. 170 sq m) in the south east corner of the site. The proposed uses are all 'Permissible' in principle in the 'Primarily Residential' land use zone, per Table 2.1.1 of the Planning Scheme.

The proposed community centre is located within the lands zoned 'Open Space Areas'. Per Table 2.1.3 of the Planning Scheme, this use is considered 'Open for Consideration' under this land use zoning and may be favourably considered, in principle. This proposal is also consistent with a Key Objective for the Kishoge South West area to develop a local node to Griffeen Valley Park, including community facilities (see Section 3.2 below for further discussion).

3.2 Kishoge Character Area

To provide more detailed design guidance for the envisaged development of the SDZ lands, the Planning Scheme sub-divides the development area into 3no. Character Areas. These Character Areas are then further sub-divided into 'Sub-Sectors' or development tiles.

Site 4 is part of a larger Part 10 Application Site for proposed development by the local authority, which is located within the Kishoge Character Area. More specifically, Site 4 is located within the Kishoge South West development area.

3.2.1 Kishoge South West - Development Parameters

Site 4 site is located within **Development Area 8 – Kishoge South West**.

Development Area 8 – Kishoge South West encompasses a total net site area of 21.55ha. As prescribed in the Planning Scheme, for calculation purposes, Net Development Area comprises Gross Development Area excluding strategic parklands, canal corridors, schools and existing residential development.

Site 4 contains 2no. Sub Sectors, the entirety of **KSW-S1** and part of **KSW-S2**, as illustrated in Figure 11 below.

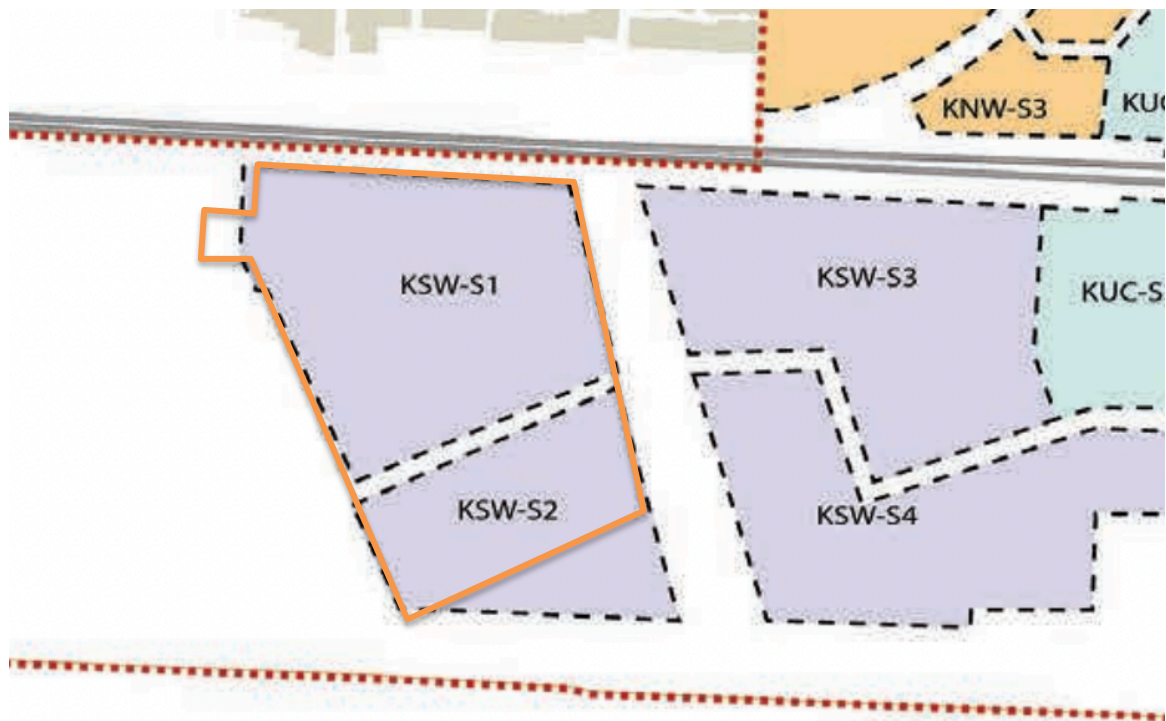


Figure 11: Extract from Clonburris SDZ Planning Scheme 2019 with the SITE 4 application site outlined indicatively in orange (Overlay by SLA).

The Planning Scheme identifies a number of **Key Objectives** for **Development Area 8 – Kishoge South West**. Table 1 below states the key objective in the first column. Confirmation of how the proposed Site 4 development is consistent with same is provided in the corresponding cell of the second column.

Key Objective:	Site 4 Consistency:
<p><i>To develop a high quality residential neighbourhood at Kishoge South West integrating with existing housing;</i></p>	<p>The proposed development is representative of a high-quality residential-led scheme with supporting local commercial and community uses and open space amenities, within Kishoge South West.</p> <p>We refer the Planning Authority to the overarching Part 10 architectural design statement, provided in the Architects Design Statement, prepared by O'Mahony Pike Architects. We refer also to the Site 4 specific architectural plans and design rationale prepared by DTA Architects. These illustrate and describe the proposed scheme, being consistent with the design principles for sub-sectors KSW-S1 and that part of KSW-S2, within Kishoge South West.</p> <p>For public open space and landscape design we refer the Planning Authority to the overarching Part 10 landscape design rationale provided by Doyle O'Trothaigh Landscape Architects. We refer also to the Site 4 specific landscape architecture plans and design rationale prepared by Bernard Seymour Landscape Architects.</p> <p>Key design moves, consistent with the development principles for this site include:</p> <ul style="list-style-type: none"> • Sub Sector Density in accordance with the Planning Scheme (refer to Section 3.2.3); • Mix of Dwellings & Tenure in line with the Planning Scheme and Development Plan (refer to Section 3.2.4); • Pedestrian and Cycle Connectivity throughout the site in line with the Planning Scheme (refer to Section 3.3); • Consistency with fixed streets and building lines (refer to Section 3.5.3); • Protection of Grand Canal Ecological Corridor as outlined in the enclosed ecological, landscaping and architectural documentation; • Flood Risk Protection Measures as documented in the architectural, landscaping and engineering material.
<p><i>To develop a new local node, Grange, comprising small-scale, local retail, service and community facilities, fronting Griffeen Valley Park;</i></p>	<p>The proposed development at Site 4 is in accordance with the parameters of the planning scheme with regards to the provision of non-residential floor space, including community, employment and retail uses.</p> <p>A community building is proposed at a small parcel of land projecting into the eastern edge of Griffeen Valley Park in the north western section of the application site. This use is 'open for consideration' at lands zoned 'Areas of Open Space', and is consistent with the Key Objective of the Planning Scheme, to locate a community facility fronting the Park.</p> <p>A local / neighbourhood retail unit (c.146 sq m) and a childcare facility (c.544 sq m) are proposed at ground floor in 'Cluster F', within the 'Primarily Residential' zoned land. Cluster F is located immediately south of the school site, within the fixed alignment of the South Link Street, at the Griffeen Park edge of the site, where such uses are 'permissible'.</p> <p>We refer the enclosed plans and particulars prepared by DTA Architects for further detail.</p>

<i>To provide locally accessible open spaces of local and strategic importance;</i>	<p>Site 4 is bounded immediately by 2no. strategic open spaces, Griffeen Valley Park to the west and a linear park to the east, designated by the Planning Scheme.</p> <p>In addition, the strategic Grand Canal Green Way lies to the south and the green buffer to the rail corridor to the north of Site 4.</p> <p>There is local green amenity space surrounding Grange House in the south eastern corner of Site 4.</p> <p>Thereafter, a series of green networks, comprising of ecological corridors and linear parks traverse Site 4, connecting the proposed housing with green amenity spaces, as illustrated in the enclosed plans prepared by DTA Architects and Bernard Seymour Landscape Architects.</p> <p>Refer to Section 3.7.1 of this Report for further detail on open space provision.</p>
<i>To develop a new primary school with direct access to the Griffeen Valley Park.</i>	<p>An undeveloped site immediately north of proposed Cluster F in Site 4, within the alignment of the South Link Street, is designated for a school site. This will be subject of a separate planning application by the Department of Education.</p>
<i>To ensure high levels of legibility and ease of orientation;</i>	<p>Building height, street function and permeability, and links with local parks and green corridors within the proposed scheme are aligned with the Planning Scheme development parameters, which seek to achieve legibility, permeability and sense of place within Kishoge South West, as a new residential neighbourhood.</p> <p>Proposed building height within Site 4 is consistent with the general building height range of 2-4 storeys for Sub Sectors KSW-S1 and KSW-S2. The proposed building height and the linear park buffer, ensure that an appropriate transition is achieved to recently permitted residential development east of Site 4.</p> <p>Block F is 6 storeys and located on the eastern edge of Griffeen Valley Park. This localised building height is consistent with the intention of the Planning Scheme to create a local landmark building at this location.</p> <p>The integration of existing Grange House connects the new development with an established local landmark, enhancing local identity and way finding.</p>
<i>To provide a new Link Street/avenue to connect to the Kishoge Urban Centre and Adamstown extension;</i>	<p>The Southern Link Street is permitted under SDZ20A/0021 and is currently under construction. The proposed development at Site 4 is required by the Planning Scheme to integrate with this fixed link street.</p>
<i>To prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue;</i>	<p>Pedestrian and routes permeate Site 4, providing sustainable transport connections through the site between the housing and the local supporting community, retail and employment uses and with the strategic parkland areas to the east and west.</p>
<i>To provide for a range of housing along the new Link Street/avenue, and local streets including homezones;</i>	<p>The Southern Link Street is permitted under SDZ20A/0021. The proposed Site 4 development provides some of the housing along the fixed Southern Link Street. This street dictates the alignment of the fixed building lines within Site 4. More intimate homezones are then</p>

	<p>created towards the north east and southern ends of the site, back from the fixed Link Street.</p> <p>Part 8 housing development approved under SD228/0003, to the east of the linear park, within KSW-S3, KSW-S4 and KUC-S3, also will see the delivery of 263no. dwellings along the new Link Street.</p>
<i>To provide a distinctive, diverse and quality frontage to the Canal corridor.</i>	<p>Subsector KSW-S2 fronts onto the Grand Canal corridor along its western edge. Site 4 does not occupy the entirety of KSW-S2, and excludes the triangular wedge fronting the Canal.</p> <p>The proposed development of Site 4 has otherwise been designed to have due regard to the fixed buildings lines identified in the Planning Scheme, and to provide pedestrian and cycle permeability through the site to facilitate appropriate connections with the Canal Greenway corridor and other local green amenity spaces.</p>
<i>To provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake;</i>	<p>SuDs features incorporated into the proposed Site 4 development include permeable paving, bio-retention systems/raingardens, roadside swales and green roofs. This is in line with the requirements of the Planning Scheme.</p> <p>We refer to the accompanying engineering pack, prepared by Cronin Sutton Consulting Engineers, and landscaping pack, prepared by Bernard Seymour Landscape Architects, for further details and discussion.</p>
<i>To promote the adaptive re-use of Grange House; and</i>	<p>It is proposed to accommodate employment use (c.170 sq m) at Grange House. Amenity green space is provided around the curtilage of the House.</p>
<i>Appropriate pedestrian access points to the Grand Canal to be sensitively designed in accordance with the Parks and Landscape Strategy and Biodiversity Management Plan.</i>	<p>The triangular land wedge along the southern edge of Subsector KSW-S2 fronting onto Grand Canal is not included within the Site 4 area.</p> <p>As such, the design and delivery of <u>direct</u> pedestrian access along the Canal frontage is outside of the scope of the Site 4 proposal. However, the proposed Site 4 layout does provide for pedestrian and cycle permeability to its south western corner and to that part of KSW-S2 that adjoins the canal edge. It also provides connections to the strategic open space lands to the east and west that provide green corridor connections with the Canal Greenway to the south and the rail corridor to the north.</p> <p>Proposed pedestrian or green linkage through the proposed Site 4 scheme, connecting with the lands adjoining the Grand Canal have due regard to the Parks and Landscape Strategy and Biodiversity Management Plan.</p> <p>We refer An Bord Pleanála to the Site 4 site layout plan, prepared by DTA Architects, and to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Bernard Seymour Landscape Architects for further detail on access points throughout the site.</p>

Table 1 – Key Objectives for Development Area 8 – Kishoge South West accompanied by a consistency response



Figure 12 - Extract from Kishoge South West Development Area, showing Site 4 site area (shaded yellow) with fixed South Link s=Street (red line), local (orange) and intimate street hierarchy, within the context of strategic green spaces to east and west, Grand Canal corridor to the south, Rail corridor to the north. (Overlay by SLA).

3.2.2 Residential Units

Table 2.13.1 of the Planning Scheme prescribes the range of total dwelling numbers for each Development Area and for each of its Sub-Sectors. The total number of dwellings proposed should lie within the range of the low margin, target and high margin figures, subject to certain caveats, as identified below.

Table 2 below provides a summary of the proposed number of dwellings in each of the sub-sectors contained within Site 4, compared with the range prescribed for those sub-sectors by Table 2.13.1 of the Planning Scheme.

Sub-Sector	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	Site 4 Dwellings Proposed
KSW-S1	245	275	306	316
KSW-S2	164	184	205	120
Totals	409	459	511	436

Table 2 – Comparison of Residential Unit Targets for Kishoge South West (extract from Table 2.13.1 of SDZ Planning Scheme) and proposed dwelling numbers within Site 4.

It may be noted that the Planning Scheme offers flexibility in relation to the transfer of dwellings between adjacent subsectors, to meet the housing allocation for the Kishoge South West Development Area, stating that:

*“Subject to no net loss of units within a Development Area and the achievement of the built form objectives, the Planning Authority may allow **up to 10% of the maximum residential units** allocated in any Sub Sector **to be transferred** to an immediately adjacent Sub Sector”*

It should also be noted that Site 4 includes the entirety of sub-sector KSW-S1, but only part (c.62.4%) of sub-sector KSW-S2.

Within **KSW-S1 subsector** of Site 4, 316no. dwellings are proposed. This exceeds the 'high margin' threshold for the subsector, by 10no. dwellings (or by c. 3.3%). This cannot be justified by way of a 10% transfer from KSW-S2, as there are not enough dwellings in this smaller part of Site 4 to support this. In addition, the balance of the KSW-S2 lands cannot be relied on to deliver this transfer, as SDCC do not control the lands.

However, it worth noting that, within the same Kishoge South West development area, adjacent subsector KSW-S3 is controlled by SDCC. Within the KSW-S3 lands, a site measuring c.4.39 is subject of consent for 202no. dwellings (Part 8, SDCC Ref. SD228/0003 refers). The Planning Scheme identifies that these lands are to accommodate a 'target' total of 274no. dwellings, with a 'high margin' total of 298no. dwellings. Applying pro-rata figures to that part of the SDCC site within KSW-S3 would show that 202no. permitted dwellings are at the low dwelling margin. Having regard to the transfer provisions of the Planning Scheme, it would then be possible to transfer up to 10% of the total high margin allocation for this subsector to the adjacent KSW-S1 site:

Sub-Sector	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	Units Consented on Site Layout Plan
KSW-S3 (total)	245	274	298	
<i>SD228/0003 site</i>	202	227	247	202
	<i>(SD228/0003 represents c.83% of KSW-S3)</i>			

Table 3 – Comparison of Residential Unit Targets for Kishoge South West (extract from Table 2.13.1 of SDZ Planning Scheme) and Consented dwelling numbers within KSW-S3 using pro rate figures

10% of the high margin dwelling allocation applicable to SD228/0003 (i.e. 247no. dwellings), thus allows for up to 25no. dwellings to be transferred to adjacent subsector KSW-S1, lying within Site 4. This being consistent with the provisions of the Planning Scheme. Consequently, Site 4 has absorbed an additional 10no. dwellings within the KSW-S1 sub-sector, while also remaining consistent with the residential density standard for this subsector (see Section 3.2.3 and Table 6 below).

Within the that part of the **KSW-S2 subsector** lying within Site 4, 120no. dwellings are proposed. This falls below the 'low margin' threshold. Similar to the case of SD228/0003, **Site 4** occupies only 62.4% of KSW-S2. The following pro rata dwelling ranges could then reasonably be applied to that part of KSW-S2 within subsector KSG-S2, rendering it consistent with the dwelling range and density for KSG-S2, as per Tables 4 and 6 below. This also allows for the residual high margin allocation to be delivered in the adjoining KSG-S2 lands to the south.

Sub-Sector	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	SITE 4 dwellings Proposed
KSW-S2 (total)	164	184	205	
Site 4 site	103	115	128	120
	<i>(Site 4 represents c.62.4% of KSW-S2)</i>			

Table 4 – Comparison of Residential Unit Targets for Kishoge South West (extract from Table 2.13.1 of SDZ Planning Scheme). Overall, the dwelling numbers proposed within Site 4 are considered to be consistent with the overall range (low margin, target and high margin) of dwelling numbers allocated to the Kishoge South West development area, and its associated sub-sectors, as prescribed by the Planning Scheme. We provide further detail below on how the density proposed in each of the sub-sectors contained within Site 4 is consistent with the Planning Scheme.

3.2.3 Residential Density

Residential Density is prescribed per Sub-Sector, in accordance with the density margins set out in **Table 2.1.8** of the Planning Scheme, as follows:

Sub-Sector	Net Site Area	Net Density Margin Per Ha (Min)	Net Density Margin Per Ha (Max)	Density Proposed
KSW-S1	6.12ha	40dph	50dph	52dph
KSW-S2*	4.09ha	40dph	50dph	29dph

Table 5 – Comparison of Residential Density Targets for Kishoge South West Sub Sectors (extract from Table 2.1.8 of SDZ Planning Scheme) and Proposed density within KSG 4.

As noted previously, **Site 4** only occupies 70% of subsector **KSW-S2**, resulting in a net site area of 2.86ha. Calculating the density based on this Site 4 net area within **KSW-S2**, results in the following compliant density being achieved at Site 4: –

Sub-Sector	Net Site Area	Net Density Margin Per Ha (Min)	Net Density Margin Per Ha (Max)	Density Proposed
KSW-S1	6.12ha	40dph	50dph	52dph
KSW-S2*	2.86ha	40dph	50dph	42dph

Table 6 – Comparison of Residential Density Targets for Kishoge South West Sub Sectors (extract from Table 2.1.8 of SDZ Planning Scheme) using net site area of SITE 4 within KSW-S2

The Planning Scheme also allows that:

*“In the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible **margin of 10 dwellings per hectare (+5 dph, - 5dph)**. The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.”*

We are of the considered opinion that the proposed residential density within Sub Sector **KSW-S1 and KSW-S2** is **consistent** with the Planning Scheme minimum and maximum density margin.

If An Bord Pleanála deem necessary, the applicant is open to a condition omitting the required number of units to provide a net density within the density ranges provided for within the Planning Scheme.

3.2.4 Residential Dwelling Mix

Section 2.1.6 of the Planning Scheme states: -

“The range of dwellings permitted in Clonburris include houses, townhouses, duplex units, maisonettes and apartments (including Build to Rent and Shared Accommodation).”

The proposed SITE 4 development includes a mix of dwelling types, in the form of houses, duplex / triplex and apartments, including: -

- 141no. houses
- 106no. duplexes
- 57no. triplexes
- 124no. apartments

The associated mix of dwelling sizes is as follows: -

- 65no. 1 bed units (14.9%)
- 177no. 2 bed units (40.6%)
- **186no. 3 bed units (42.7%)**
- 8no. 4 bed units (1.8%)

The Planning Scheme does not prescribe a specific dwelling mix ratio for the SDZ development area, its Character Areas or sub-sectors, in order to facilitate market flexibility over the lifetime of the plan.

However, it is noted that the current County Development Plan prescribes that:

*“Proposals for residential development shall provide a **minimum of 30% 3-bedroom units, a lesser provision may be acceptable** where it can be demonstrated that:*

- *there are unique site constraints that would mitigate against such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme”*

The proposed development at Site 4 includes **186no. 3-bed dwellings**, equivalent to **42.7%** of the dwelling mix. This is consistent with the Development Plan requirement that min. 30% 3-bed units are to be provided.

Duplex and Triplex units are categorised as apartment units within the Development Plan. Therefore, the mix of such unit types is assessed under the Apartment Guidelines (2023). **SPPR 1** of the Apartment Guidelines requires that:

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

When the housing units are excluded, 295no. apartment type units are proposed, with a mix as follows –

- **65no. 1 bed units (22%)**
- 177no. 2 bed units (60%)
- 53no. 3 bed units (18%)

The proposed number of **1-bed units** in Site 4 **does not exceed 50%** and is **consistent with SPPR 1** of the Apartment Guidelines (2023).

We refer the Planning Authority to the Design Rationale, Schedule of Accommodation and Housing Quality Assessment (HQA), prepared by DTA Architects, which demonstrates the mix and quality of the dwellings proposed.

3.2.5 Social Housing

We can confirm all proposed residential units are for South Dublin County Council housing purposes (social and affordable).

We refer to the enclosed Indicative Tenure Plan prepared by O’Mahony Pike Architects for further detail.

3.2.6 Dwelling Size and Private Amenity Space

The Planning Scheme asserts that the design and layout of individual dwellings should provide a high quality living environment for residents. Dwellings should provide adequate room sizes that create good quality living spaces. In this regard, the Planning Scheme requires that all proposed houses shall accord with or exceed the minimum floor area standards set out in **Table 2.1.9**.

Table 2.1.9 | Minimum Space Standards for Houses

Type of Unit	Houses	Private Open Space
One Bedroom	50 sq.m	48 sq.m
Two Bedroom	80 sq.m	55 sq.m
Three Bedroom	92 sq.m	60 sq.m
Four Bedroom or more	110 sq.m	70 sq.m

Figure 13: Extract from Table 2.1.9 – Minimum Space Standards for Houses from the Clonburris SDZ Planning Scheme

We refer to the enclosed plans and particulars prepared by DTA Architects demonstrating compliance with Table 2.9.1 of the Planning Scheme.

In respect to apartment units, the Planning Scheme requires that all apartments shall accord with or exceed the open space and floor area standards set out in '*Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*' and as provided in **Table 2.1.10** of the Planning Scheme.

Table 2.1.10 | Minimum Space Standards for Apartments

Type of Unit	Apartments	Private Open Space	Communal Open Space	Storage
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7 sq.m	6 sq.m
Three Bedroom	90 sq.m	9 sq.m	9 sq.m	9 sq.m
Four bedroom or more	105 sq.m	12.5 sq.m	12.5 sq.m	12 sq.m

Figure 14: Extract from Table 2.1.10 – Minimum Space Standards for Apartments from the Clonburris SDZ Planning Scheme

We refer to the enclosed plans and particulars prepared by DTA Architects demonstrating compliance with Table 2.9.1 of the Planning Scheme, with Apartment Blocks F, H and J providing a generous areas of communal open space.

For the duplex and triplex units, due to issues with management, access and physical constraints, it has not been possible to provide a dedicated area of communal open space for these units. The adopted strategy however is to provide a significant overprovision/ doubling of private space for each dwelling, such that the quantum achieves the required provision for both private and communal space and in doing so, significantly enhance the amenity value of the dwelling. It is considered that this is non-compliance is minor and does not amount to a material contravention.

3.2.7 Non-Residential Development

Table 3.3.8 of the Planning Scheme requires that the following non-residential floor area quantum is accommodated within the Kishoge South West Development Area:

- Non-retail commercial development – **200 sq m minimum**
- Retail development – **550 sq m maximum**
- Community – **600 sq m minimum**

To date within the Kishoge South West Development Area, SD228/0003, an approved Part 8 development, includes c.276.3 sq m of community facilities and a c.46.1 sq m homework room, within sub-sector KSW-S3. Note the Planning Scheme categorises 'Home Working' within the 'Employment Floorspace' sector.

Within proposed Site 4 (containing sub-sectors KSW-S1 and part of KSW-S2), Block F includes c.150sqm retail unit and a c.544 sq m childcare facility (with play area) at ground level, within the vicinity of the 'Grange Local Node' indicated by the Planning Scheme. The Planning Scheme categorises 'Childcare Facilities' as a 'Community Use'. However, this arguably also functions as a 'non-retail commercial development' or employment provider. We would further highlight that, within the north western corner of Site 4, a community building (c. 683 sq m) is proposed fronting Griffeen Valley Park area.

Employment use (c.170 sq m) is envisaged as part of the reuse of Grange House in the south east corner of Site 4. Grange House will also benefit from proposed amenity open space, which will provide a public amenity and a buffer to this building of local heritage interest. The exact nature of the employment use and any works required to Grange House to facilitate this will be subject of a separate future application.

We would therefore submit that the proposed retail, employment and community facilities within Site 4 (sub-sectors KSW-S1 and KSW-S2) are consistent with the maximum retail/retail services and minimum commercial and community use quantum requirements of the Planning Scheme for Kishoge South West. They are also consistent with the Planning Scheme objective to locate a local park node and community facilities fronting Griffeen Valley Park along the western edge of Site 4, and to identify a use for Grange House.

Non-Resi Floor Space	Planning Scheme Requirement	Proposed in Site 4	Total Proposed and Permitted to Date in KSW
Community	600 sqm min.	c. 683.0 sqm	c. 959.3 sqm
Retail	550 sqm max.	c. 150.0 sqm	c. 150.0 sqm
Non-retail commercial development / Employment	200 sqm min.	c. 544.1 sqm	c. 544.1 sqm

Table 7 – Clonburris Planning Scheme Non-Residential Floorspace Requirements for Development Area 8 and Proposed / Permitted Provision

3.3 Movement and Transport

3.3.1 Street Hierarchy

Figure 2.2.1 of the Planning Scheme sets out the fixed and flexible Street Hierarchy associated with the Kishoge South West Development Area.

The proposed development provides a street network that is closely aligned with the indicative Street Hierarchy as seen above. The proposed development has due regard to the typology, primacy, alignment and design speed further specified in Table 2.2.1 of the Planning Scheme.

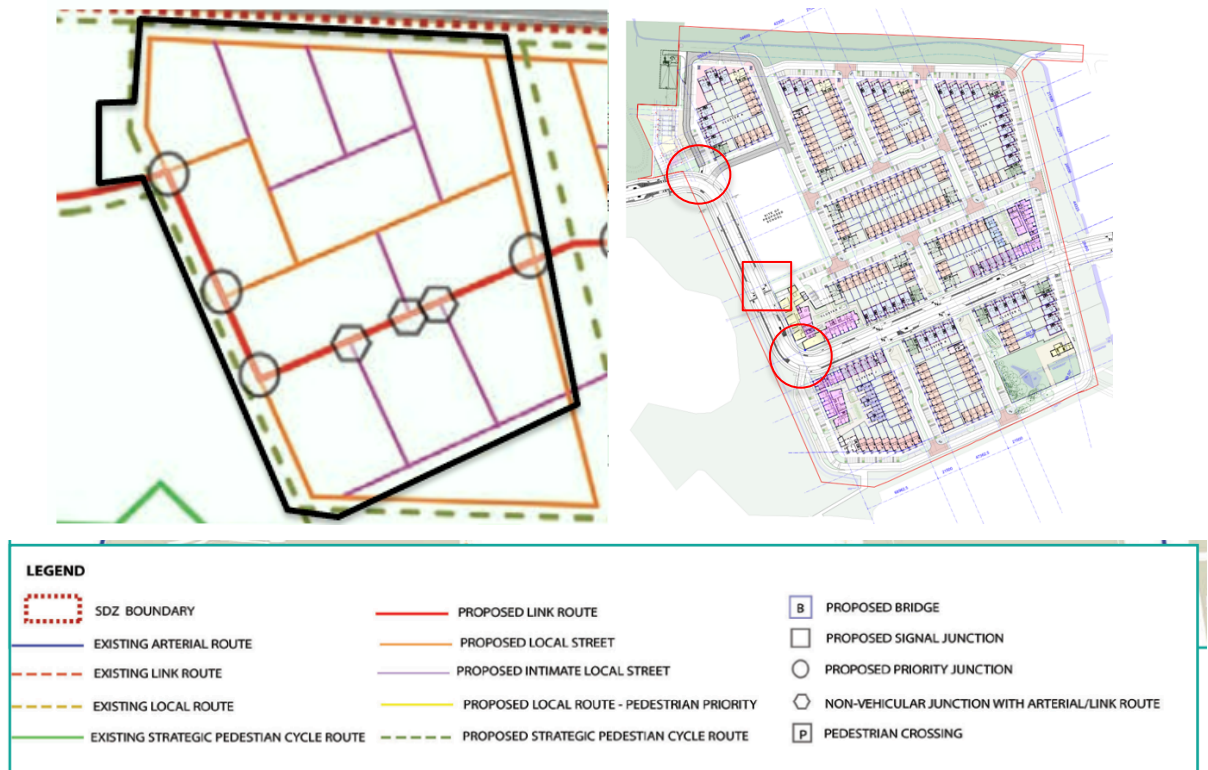


Figure 15: Extract from **Figure 2.2.7** of the Clonburris SDZ Planning Scheme, showing the overall movement concept for Development Area 8, with approximate SITE 4 site area outlined black (SLA Overlay), compared to proposed Site 4 site plan.

As there is now planning approval for the fixed Southern Link Street (SDCC Reg. Ref. SDZ20A/0021), both the building and centre lines within the proposed Site 4 site plan necessarily take account of this. We refer to some slight adjustments proposed within Site 4 to the design of the junctions with the fixed street, compared to Figure 2.2.7 (see red circles) of the Planning Scheme.

As identified in Figure 13 above, the Planning Scheme provides for a 'Priority Junction' to be provided at the junction of the South Link Street (SLS) and a local street (orange line), as indicated by a red circle on the Planning Scheme movement diagram (on the left). However, Condition 4 of the Phase 1 Infrastructure permission for the SLS (SDCC Reg. Ref. SDZ20A/0021 refers) requested engagement and agreement on the typology and location of each required junction. The permitted SLS provides a modal filter junction, with no vehicles at this location. Compliance agreement has been issued by South Dublin County Council in respect of this approach. Consequently, a pedestrian/cycle connection is instead proposed at this junction location within Site 4.

We would consider that this minor departure from the detail of the junction design, indicated in the Planning Scheme at this location, is an unavoidable consequence of the approved, fixed South Link Street design. The design of the fixed strategic road network connecting the wider Clonburris SDZ must take precedence. The proposed junctions within the Site 4 scheme are otherwise fully consistent with the Planning Scheme movement and transport diagram for this site.

3.3.2 Car Parking Standards

Section 2.2.6 of the Planning Scheme states: -

"The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme. The standards are maximum parking standards and should not be viewed as a target. Details in relation to the design of car parking are set out under Section 2.8 (Built Form and Design) of this Planning Scheme."

The 'Accessibility Levels' identified in **Figure 2.2.8** of the Planning Scheme (see below) correspond to the Parking Zones stated in the Development Plan accordingly: -

- **Zone 2** parking standards prescribed under the Development Plan shall be applied to all areas that have been identified with an **Accessibility Level 1, 2 or 3**.
- Zone 1 parking standards shall be applied to all other areas of the SDZ lands.

Site 4 is located within Accessibility Level 1, as identified in Figure 2.2.8 of the Planning Scheme. As such the Zone2 parking standards of the County Development Plan apply to the proposed development.

We refer the Board to previous discussion of these car parking standards in Section 2.5, above, in this report.

The proposed development includes 408no. surface car parking spaces. As per the requirements of the Development Plan, a total of 134no. (33%) of these car parking spaces will be equipped with functional EV charging points and shall be reserved for the use of battery-powered electric vehicles. The balance of the proposed car parking spaces in Site 4 will be 'future-proofed' through the inclusion of cables or ducting, to allow the rapid future installation of additional EV charging points, as allowed by the Planning Scheme for this type of development.

We acknowledge the Planning Scheme states that *"developments should provide charging points for the charging of electric vehicles at a rate of 100% of the car parking provision"*. We note that SDCC, as planning authority, has not been imposing this provision within the SDZ area and instead considers the Development Plan requirement for 20% to be appropriate. This approach has been adopted by SDCC in recent applications in the Planning Scheme area including SDZ24A/0033W, SDZ23A/0004 and SDZ23A/0018.

Based on the above precedent, noting a significant quantum (33%) of EV parking is proposed and that the balance of all car parking spaces will be 'future-proofed' through the inclusion of cables or ducting, to allow the rapid future installation of additional EV charging points, we consider that the proposed development is broadly consistent with the Planning Scheme. We note here that any potential contravention is not material.

We refer the Board to the Traffic & Transport Assessment and Residential Travel Plan, prepared by Cronin Sutton Consulting Engineers for further discussion in relation to proposed car parking provision.

Figure 2.2.8 | Accessibility Levels for Identification of Car Parking Zones



Source: Clonburris Strategic Development Zone Transport Assessment and Strategy (2017)

Figure 16: Extract from Figure 2.2.8 Accessibility Level of the Planning Scheme of the Planning Scheme with application site outlined in orange (Overlay by SLA).

In accordance with **Section 2.8.10** of the Planning Scheme, parking has been carefully designed not to dominate streetscapes and to integrate seamlessly into the public realm. As per the requirements of the Planning Scheme, the number of spaces per car parking bay is limited to 3no. parallel spaces and 6no. perpendicular spaces.

3.3.3 Bicycle Parking

Section 2.2.6 of the Planning Scheme states: -

“The minimum parking standards for the SDZ lands are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme.”

We refer the Planning Authority to Section 2.6 of this Report which confirms compliance with the Development Plan bicycle parking requirements.

The minimum standards set out in Table 12.23 of the Development Plan relate to apartments / duplexes and reflect the standards prescribed in the Apartment Guidelines.

The proposed development provides 793no. bicycle parking spaces, consisting of 591no. long term and 202no. short term spaces.

We refer the Board to the Traffic & Transport Assessment and Residential Travel Plan, prepared by Cronin Consulting Engineers for further discussion in relation to bicycle parking provision.

The bicycle parking requirements for Duplexes / apartments are in accordance with the Apartment Guidelines.

3.3.4 Transport Assessment

Section 2.2.7 of the Planning Scheme states: -

“Transport and Traffic Assessments (TTAs) should be carried out on a case by case basis for developments that have the potential to generate a significant increase in trips on the overall transport network.”

We refer the Board to the Transport and Traffic Assessment, prepared by Cronin Sutton Consulting Engineers, in relation to the likely impact of the proposed Site 4 scheme on street traffic and vehicle parking needs.

3.3.5 Mobility Management Plan

Section 2.2.7 of the Planning Scheme states: -

“Individual MMPs or Workplace Travel Plans (WTP) should also accompany applications for larger sized developments in accordance with the recommendations of the NTA’s Achieving Effective Workplace Travel Plans: Guidance for Local Authorities (2012).”

We refer the Board to the Residential Travel Plan, prepared by Cronin Sutton Consulting Engineers, in relation to the proposed measures to encourage sustainable travel modes and reduce car borne traffic within the proposed SITE 4 scheme.

3.4 Green and Blue Infrastructure

It is an overarching principle of the Planning Scheme to: -

“Deliver a network of high quality green and blue infrastructure spaces and public parks while protecting, enhancing and sensitively upgrading the natural, built and cultural assets of Clonburris lands.”

Some of the **Key Principles** for green and blue infrastructure in the Planning Scheme that relate to the proposed development are as follows: -

- To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.
- To retain and improve key landscape and ecological features such as hedgerows, the Grand Canal and the Griffeen River.
- To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems.
- To seek to retain hedgerows, aquatic habitats and established tree lines wherever possible.

The proposed landscape scheme is a key component of the integration of the new building environment with the existing and permitted landscape conditions. The key landscape features to support green infrastructure include: -

- A range of public amenity spaces are available to allow prospective residents to avail of opportunities for passive and active recreation.
- The design of local and intimate streets will enhance permeability and quality of facilities for pedestrian and cyclists, encouraging active travel through the proposed development and to adjacent amenity areas.
- Public open space is proposed within the curtilage of Grange House, for amenity use and to act as a buffer to this building of local heritage interest.
- Strategic public open space (Griffeen Valley Park) is located to the west of the development with the linear park to the east. We note that these areas of open space are not proposed within Site 4 but are available to it, as envisaged by the Planning Scheme.
- The Griffeen River corridor will be managed for biodiversity – planting will be enhanced where necessary, and a dark corridor will be maintained for bats.
- The Grand Canal Greenway and Ecological Corridor, will be accessible through the southern portion of KSW-S2. Note that no buildings are proposed within the ecological buffer area as per the requirements of the Planning Scheme.

We refer the Board to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Bernard Seymour Landscape Architects for further detail on the landscaping proposals within Site 4.

We refer also to the site wide Tree Survey and Planning Report and associated Arborist Drawings, prepared by John Morris Arboricultural Consultancy that are enclosed with this planning application.

For the overarching landscape scheme for the wider Part 10 application proposal, which Site 4 is integrated with, we refer to the enclosed landscape pack prepared by Doyle + O'Troithigh Landscape Architecture.

The proposed development has been designed to be consistent with **Figure 2.3.1 – Green Infrastructure Network** of the Planning Scheme.

In summary, the proposed development incorporates / will have a connection to the following:

- SUDS and Biodiversity within the Open Space and Proposed Streetscapes within the red line are proposed;
- Linear Park to the East;
- Griffeen Valley Park to the West;
- Ecological Corridor along the rail line to the North is included within the red line;
- Grand Canal Ecological Corridor to the South.

Figure 2.3.1 | Green Infrastructure



Figure 17: Extract from Figure 2.3.1 Green Infrastructure Network of the planning Scheme with Site 4 site indicatively outlined in orange (Overlay by SLA).

3.4.1 Grand Canal

The Grand Canal is a proposed Natural Heritage Area (pNHA). Development proposals in proximity to the Grand Canal are required under the Planning Scheme to: -

“Protect and incorporate high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches.”

The Planning Scheme states that development (with the exception of footpaths and bridges) is required to maintain a 30m set back distance from the boundary of the pNHA. The proposed buildings in Site 4 are not located within 30m of the Grand Canal pNHA. There is some encroachment of landscape and road details in the south western corner of Site 4, but this is allowed for by the Planning Scheme.

3.4.2 Sustainable Urban Drainage

Section 2.3.2 of the Planning Scheme states: -

“It is essential that open spaces accommodating SUDS measures such as attenuation ponds, shall be designed in order to achieve a balance between surface water management and high quality open space.”

The key elements of the proposed SUDS measures are as follows:

- *The SUDs shall be designed into the street, public squares and open space network, as a series of ‘wet’ and ‘dry’ landscape elements. These should be of a high quality to achieve a multifunctional space for amenity, biodiversity and surface water management and should include grasses and swales, and high quality, well designed attenuation ponds and constructed wetlands.*
- *A system of infiltration trenches, tree pits, permeable paving green roofs, and other elements shall be provided that should direct surface water to attenuation areas.*
- *Swales should be designed as linear landscape elements and used as elements to enhance streetscape and neighbourhood character and identity.*
- *Surface water should be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units.”*

SuDs features incorporated into the proposed SITE 4 development include permeable paving, bio-retention systems/raingardens, roadside swales and green roofs. This is in line with the requirements of the Planning Scheme.

We refer to the accompanying engineering pack, prepared by Cronin Sutton Consulting Engineers, and landscaping pack, prepared by Bernard Seymour Landscape Architects, for further details and discussion.

3.5 Built Form and Design

3.5.1 Design Criteria

Section 2.8.2 of the Planning Scheme states: -

“To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ retail services development) shall be accompanied by a Design Rationale...”

We refer the Board to the Design Rationale, prepared by DTA Architects, for further detail in respect of the architectural coherency and quality of the proposed design of the Site 4 scheme, having regard to the design criteria of the Planning Scheme.

We provide a high level summary of the key design criteria, inclusive of Block Size and Form, Building Centre Line and Urban Grain, Building Height and Movement Strategy in the sections below.

3.5.2 Block Size and Form

Section 2.8.3 of the Planning Scheme states: -

“Development across the SDZ lands shall be shaped and defined by the street network prescribed under the Movement and Transport section of this Planning Scheme (Section 2.2) and shall be divided into a series of blocks that present strong building frontages to surrounding streets especially at corners.”

The proposed development has been designed to be consistent with the street network identified in the Movement and Transport section of the Planning Scheme.

As outlined previously, in Section 3.2.21 of this report, the proposed Site 4 street network is aligned with the fixed link streets and local streets. It is also closely aligned with the layout of the more intimate streets, and the design of priority and non-priority junctions. The proposed development has due regard to the typology, primacy, alignment and design speed further specified in Table 2.2.1 of the Planning Scheme.

3.5.3 Building Centre Line and Urban Grain

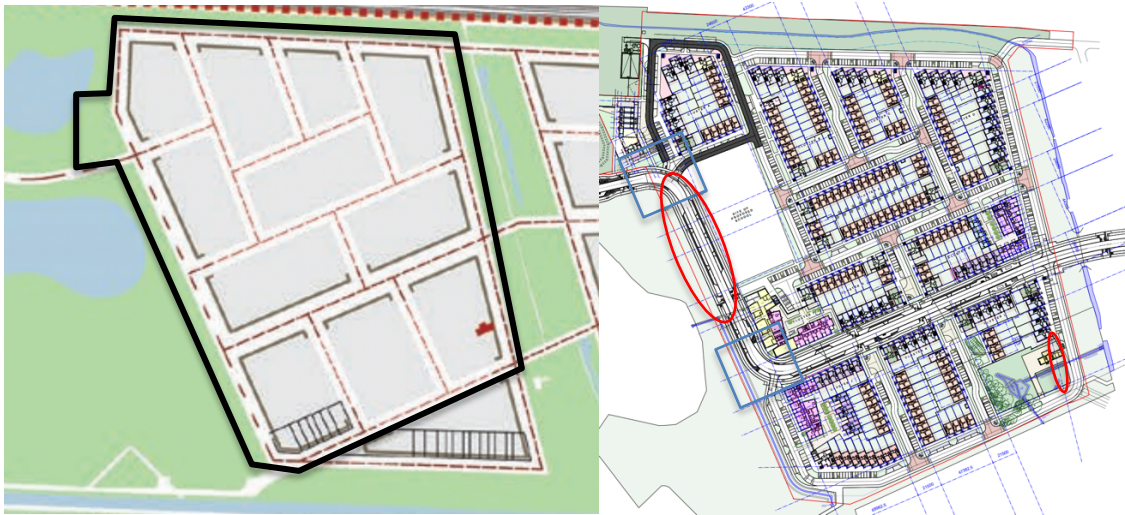


Figure 18: Extract from **Figure 2.8.5** of the Planning Scheme showing fixed urban design requirements (building lines, centre lines, parks/squares and urban grain), compared with proposed SITE 4 layout. Red circles indicate departure from fixed line detail, due to need to respond to existing strategic infrastructure (site constraints).

In the first instance, we confirm that the proposed school site identified within Subsector KSW-S1 of the Planning Scheme does not form part of the Part 10 planning application. It will be subject of a separate planning application by the Department of Education.

In general, the fixed building lines and centre lines are a product of the fixed link streets, prescribed by the Planning Scheme. However, in the context of the planning approval for the **Southern Link Street** (SDCC Reg. Ref. SDZ20A/0021), which traverses along the western boundary and bisects Site 4, it is necessary to make some localised adjustments to the proposed building lines and centre lines in a number of instances in Site 4 to take account of this. In the proposed site plan to the left in Figure 18 above, the blue boxes along the western site boundary indicate where the road centre deviates somewhat from the fixed line identified in the Planning Scheme diagram (which is not to scale). This is justified in the context of the approved South Link Street and the requirement for proposed Site 4 plan to respond to this imposed configuration.

We note that **Grange House** is a Heritage Structure. A key principle of the Planning Scheme seeks to: -

“To incorporate Architectural Heritage structures and features throughout the SDZ lands in a manner that promotes place making and capitalises on the unique industrial heritage of the surrounding area.”

In the south eastern corner of Site 4, it is recognised that Grange House, identified as a Heritage Structure of local interest in the Planning Scheme, must be appropriately incorporated into the proposed layout. In doing so, there arises a minor departure in the detail of the fixed building line of the urban block to the linear park edge, compared to the Planning Scheme diagram. It is proposed to accommodate some adaptive employment reuse at Grange House, with public amenity open space providing a suitable buffer between this heritage building and the proposed Site 4 housing development surrounding it.

3.5.4 Building Height

Prescribed building heights are set out for each sub-sector and Development Area within the Clonburris SDZ Planning Scheme.

The Planning Scheme confirms that general building heights are outlined in **Figure 2.8.10**, whilst more detailed requirements are set out in Section 3 – Development Areas.

Site 4 is located within Development Area 8 – Kishoge South West, where Sub Sectors KSW-S1 and KSW-S2 have prescribed building heights of 2-4 storeys.

As identified within Figure 2.8.10 of the Planning Scheme, a ‘Local Landmark’ building is identified along the western edge of the Site 4, where the Planning Scheme allows that,

“Buildings that exceed the prescribed general buildings heights shall only be provided at these designated landmark locations (see Fig. 2.8.10). An additional 1-2 storeys is permissible for Local Landmark Buildings.”

Building height within the proposed Site 4 development is consistent with the range of 2-4 storeys, consistent with Table 3.3.8 of the Planning Scheme for Kishoge South West, within Sub Sectors KSW-S1 and KSW-S2.

A local landmark building of 6 storeys in height is proposed at Block F along the western edge of Site 4, beside Griffeen Valley Park, consistent with the Planning Scheme designated landmark location.

We refer the Board also to the enclosed plans and particulars prepared by DTA Architects, for further design details.



Figure 19: Extract from **Figure 3.3.2** of the Clonburris SDZ Planning Scheme identifying Building Height Concept. Approximate SITE 4 site area in black (SLA Overlay)

3.6 Services and Infrastructure

3.6.1 Water Supply

The strategic objectives for the delivery of water services are set out by the Water Services Strategic Plan (WSSP) by Irish Water up to 2040. At a local level, SDCC manages aspects of the water supply and foul drainage networks.

The Planning Scheme notes that capacity in the surrounding water supply network is *“generally sufficient”* to supply the SDZ lands, and that the projected population of Clonburris has been taken into account by Irish Water in their planning for the Greater Dublin Area.

The enclosed Engineering Services Report prepared by Cronin Sutton Consulting Engineers confirms,

“It is proposed to provide 150mm and 200mm internal diameter mains to service this development. These mains shall be interconnected and fed by new connections to the 150mm diameter and 200mm diameter spurs provided along in the SLR. Each apartment block shall have 1no. connection to supply its residential elements. Individual, smaller connections shall be provided to the non-residential elements within each apartment block. The exact details of all connections will be finalised at detailed design stage, through the Uisce Éireann connection application process. Each individual residential dwelling fronting the SLR will have its own connection to the 180mm diameter distributor main within

the SLR. Spurs to service these dwellings will be provided during the SLR construction, having been coordinated through regular meetings with the CIL team."

We refer the Board to the Statement of Design Acceptance, in respect of the proposed development, which demonstrates compliance with Irish Water Standards.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for water supply.

We refer to the Engineering Pack prepared by Cronin Sutton Consulting Engineers for further information in this regard.

3.6.2 Foul Water Drainage

The Planning Scheme notes that wastewater infrastructure development within the SDZ must align with Irish Water's Strategic Network Development Plans for the SDZ.

The enclosed Engineering Services Report prepared by Cronin Sutton Consulting Engineers confirms,

"It is proposed to discharge all foul effluent from the proposed development by gravity to the foul sewers in the SLR. Throughout the development site and at each connection, the manholes within the site shall be in accordance with SDCC and Uisce Éireann taken in charge requirements, and accessible for maintenance purposes. The final number and specifications of these connections to the external foul drainage network will be finalised at detailed design stage, through the Uisce Éireann connection application process. Each individual residential dwelling fronting the SLR will have its own connection to the 300mm diameter foul sewer within the SLR. Spurs to service these dwellings shall be provided during the SLR construction, having been coordinated through regular meetings with the CIL team."

A Confirmation of Feasibility was received in D116 Engineering Services Report | Kishoge/Clonburris, Lot 2, Site 4 12 response on the 12th of August 2024, stating that connection of such a development to the public wastewater network (via the SLR wastewater infrastructure) would be feasible without infrastructure upgrade by Uisce Éireann.

We refer to the Engineering Pack prepared by Cronin Sutton Consulting Engineers for further information in this regard.

3.6.3 Surface Water Drainage

A Surface Water Strategy (SWS) was carried out in respect of the Planning Scheme and forms part of the accompanying documents to the Planning Scheme.

The key principles of surface water management outlined in the Surface Water Strategy (SWS) accompanying the Planning Scheme are as follows: -

- Manage surface water runoff at source in order to prevent or reduce surface water flows.
- Manage water on the surface to intercept flows and direct them to areas designed to treat, store and discharge flows away from residential dwellings, businesses, and transportation networks, where disruption and flooding could occur.
- Develop a high quality SuDS integrated within public realm and public open space where feasible, to provide high quality and attractive 'green and blue' corridors, features and focal points with the SDZ landscape, which can also enhance local amenity, ecology and biodiversity.
- Effective operation and maintenance of SuDS measures, to ensure that such systems are operating to their designed capacity.
- Account for climate change and any changes to the amount of impermeable areas over the design life of the development, in accordance with the GDSDS.

The enclosed Engineering Services Report prepared by Cronin Sutton Consulting Engineers confirms,

“The CIL works, proposed under permission (Reg. Ref. SDZ20A/0021) include the SLR, drainage and its associated services. It is intended to discharge at an unrestricted rate to this surface water network from the development site into the proposed 300mm diameter to 600mm diameter spurs, proposed under the SDZ planning permission. From there it shall continue to the regional attenuation ponds and outfall to the Kilmahuddrick Stream (as described in sub-section 5.4). Integration of the proposed development with this existing infrastructure ensures that stormwater runoff from the development site shall not flow into neighbouring sites but shall instead be collected and subsequently released in a controlled manner after the peak storm duration has passed.

It is proposed to discharge surface water run-off from the proposed development by gravity via new connections to the 300mm diameter to 600mm diameter surface water spurs along the SLR extent. At each connection, the manholes shall be in accordance with SDCC requirements and standard details, and accessible for maintenance purposes.”

The Sustainable Urban Drainage Strategy (SuDS) strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed include the following: -

- Permeable paving.
- Green roofs.
- Roadside Bio-retention Tree Pits.
- Swales

The SuDS measures proposed have been co-ordinated with the landscaping scheme presented by Bernard Seymour Landscape Architects.

We refer to the Engineering Pack prepared by Cronin Sutton Consulting Engineers for further information in this regard.

3.6.4 Flood Risk Assessment

We refer to the enclosed Flood Risk Assessment prepared by JBA Consulting Engineers and accompanying Technical Memorandum prepared by McCloy Consulting.

3.6.5 Energy and Efficiency

The planning scheme identifies that the construction of new homes is required to comply with Building Regulations Part L.

A Climate Action and Energy Statement prepared by Metec Consulting Engineers is enclosed with this planning application.

3.6.6 Waste Management

The Planning Scheme identifies that waste and recycling requirements need to be fully considered and implemented in design, construction and operational phases of development.

We refer the Board to the Resource Waste Management Plan and the Operational Waste Management Plan, prepared by AWN Consulting, which detail how waste will be appropriately and sustainably managed during construction and operation of the proposed development, in accordance with the relevant directives, guidelines and standards.

3.6.7 Noise

The Planning Scheme confirms that development proposals shall have regard to the Dublin Agglomeration Environmental Noise Action Plan 2013-2018, with particular regard to development adjacent to major road and rail transport corridors. This is with a view to reducing noise from new sources and to identify and protect potentially vulnerable areas of low sound levels.

We refer to the Noise and Vibration Chapter of the Environmental Impact Assessment Report, prepared by AWN Consulting enclosed with this application.

3.6.8 Construction Environmental Management Plans

The Planning Scheme requires that a Construction Environmental Management Plan (CEMP) is to be developed prior to the initiation of the physical components outlined in the Planning Scheme, and the mitigation of same will be executed throughout the project.

We refer to the enclosed Construction Environmental Management Plan, prepared by DBFL Consulting Engineers.

3.7 Landscape and Open Spaces

3.7.1 Open Space

Figure 2.10.1 of the Planning Scheme provides an indicative layout of the hierarchy of existing and proposed parks on the lands.

Figure 2.10.1 | Open Space

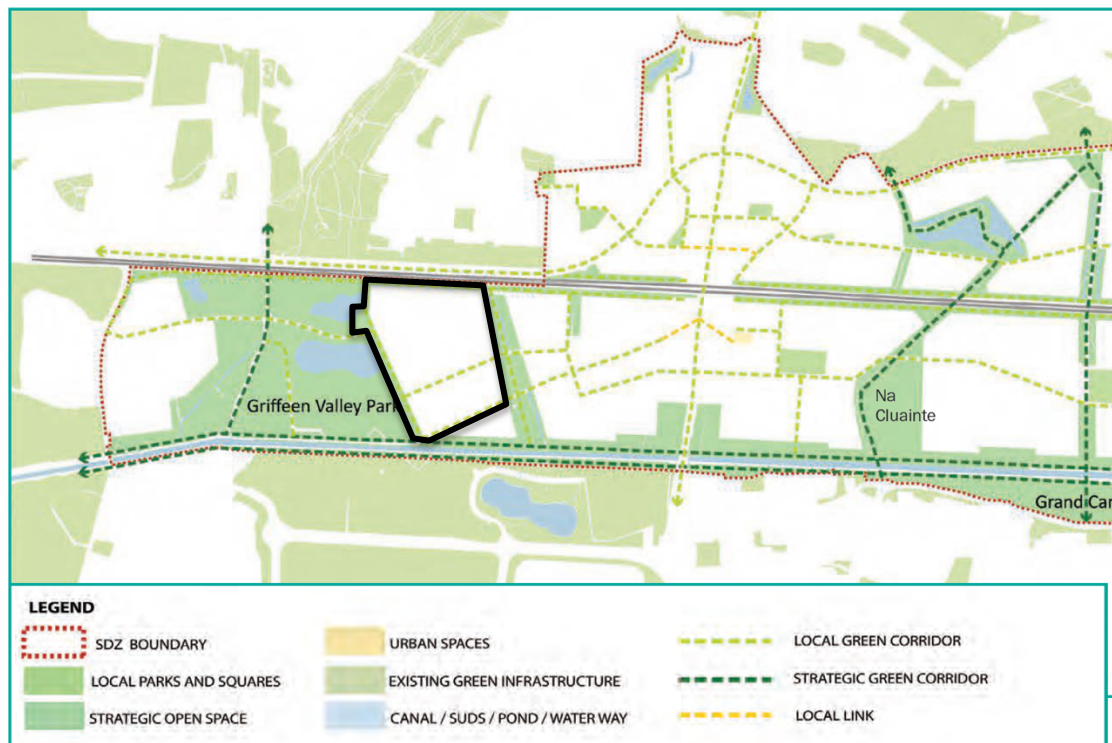


Figure 20: Extract from Figure 2.10.1 Open Space of the Planning Scheme with application site outlined in black(Overlay by SLA).

The Planning Scheme states:

“The proposed open spaces represent important interfaces between existing and proposed neighbourhoods. Key requirements for these open spaces shall include pedestrian and cyclist connectivity through and between the parks, adjacent neighbourhoods and public transport.

It is essential that the edge of the open spaces and central walkways are designed to be well lit, well overlooked, legible and accessible. In addition, it is a key requirement that the amenity of existing landscape assets within the proposed parks, including the Grand Canal, habitats and historic features are enhanced and where appropriate, integrated into the landscape structure.

The main active outdoor recreation facilities will largely be accommodated in the three main parks on the SDZ lands: the extension to Griffeen Valley Park, Grand Canal Park and Na Cluainte Park. The facilities in the main parks will be complemented by local play facilities including full size playing pitches, to be provided in the local open spaces.”

We refer to the enclosed Landscaping pack prepared by Bernard Seymour for detail on the proposed landscape strategy.

As previously identified in Section 2.4 (Green and Blue Infrastructure), above, the proposed development incorporates / will be sustainably connected to the following amenity open space features in the immediate area:

- SUDS and Biodiversity within the Open Space and Proposed Streetscapes within the red line are proposed;
- Linear Park to the East;
- Griffeen Valley Park to the West;
- Ecological Corridor along the rail line to the North is included within the red line;
- Grand Canal Ecological Corridor to the South.

3.8 Biodiversity and Natural Heritage

Key principles for Biodiversity and Natural Heritage in the Planning Scheme which relate to the proposed development are as follows: -

- To seek to protect and enhance natural, built and cultural heritage features, where appropriate, such as the Grand Canal, streams, Protected Structures and barony and townland boundary hedgerows.
- To avoid or minimise the impact on protected species and their habitats.
- Incorporate biodiversity and heritage into new developments.

The key features of relevance to the Site 4 proposal are outlined below.

3.8.1 Ecological Corridors

The Planning Scheme identifies that there are three primary ecological corridors at the Kishoge lands, including the Grand Canal and associated towpath, Griffeen River and along the railway line.

The proposed development is proximate to the Grand Canal, separated by a wedge of sub-sector KSW-S2 land, to the south of Site 4. The existing ecological corridor will be retained and respected. The Planning Scheme states that development (with the exception of footpaths and bridges) is required to maintain a 30m set back distance from the boundary of the pNHA. Within the SITE 4 site, all buildings adhere to the 50m setback with some slight encroachment for landscaping, roads, footpaths and car parking included within the 30-50m buffer zone in accordance with the requirements of the Planning Scheme.

The proposed development at Site 4 has been designed to ensure that development does not significantly encroach on the Grand Canal ecological corridor, while still providing for appropriate pedestrian and cycle connections to the Grand Canal Way Greenway.

The railway corridor lies along the northern boundary of Site 4. The existing mature tree line along the railway corridor is to be protected, to ensure the protection of an enriched biodiversity, further supported by the introduction of native meadows and bird nesting boxes.

3.8.2 Hedgerows

There are over 30km of hedgerows that must be protected across the SDZ lands. Section 2.11.2 of the Planning states that: -

“The hedgerow / treeline habitat linking the Grand Canal Corridor and the Rail Corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats.”

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Bernard Seymour Landscape Architects, as well as to the arborist drawings John Morris Arboricultural Consultancy and reports prepared by for further detail.

Mixed native hedgerow is proposed in the open spaces to mitigate the removal of hedgerow during site construction. This is to be maintained at 1.1m in height unless otherwise stipulated. Biodiverse whip planting with a quantum of standard and semi mature trees along the northern boundary will form a ‘Ecological corridor’ for wildlife along the site.

3.8.3 Street Trees

The Planning Scheme provides that street trees should be considered an integral part of the street environment, in accordance with DMURS. Trees should be planted in medians, verges and build outs. Tree planting should be at frequent intervals, particularly where it can soften the impact of on-street parking. Larger tree species should be planted along all arterial and link streets.

Within the proposed local streets in Site 4, street trees are incorporated to provide green links and vistas to the adjacent open spaces. They will contribute to the sense of enclosure, act as a buffer to traffic pollution and enhance the quality of the space. The landscape architect confirms that,

“Street tree planting will consist of species with fastigate or neat forms suitable to the scale of the streetscape and those which will thrive in a streetscape environment. Street tree planting is designed together with the street lighting to avoid shading. Street trees will be planted into a minimum of 7cu.m. topsoil, with the use of urban tree soils, root barriers to protect water utilities and topsoil loaded rootcells to increase rooting areas outside the main tree pit area as necessary.”

We refer the Planning Authority to the accompanying Landscape Design Report and Landscape Drawings, prepared by Bernard Seymour Landscape Architects, for further details of the proposed tree planting.

3.9 Archaeological Heritage and Architectural Heritage

It is an overarching principle of the Planning Scheme: -

“To retain and enhance architectural heritage and archaeological heritage features, sites and structures within the SDZ lands by encouraging conservation and incorporation including adaptive re-use, where appropriate, within the built fabric and landscape of the SDZ Lands.”

The Planning Scheme also includes the following key principle,

“To ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process.”

As identified on Figure 2.12.1, an ‘Additional Heritage Structure’, Grange House, is located in the south east corner of the Site 4 site.



Figure 14: Extract from Figure 2.12.1 Archaeological and Architectural Heritage Concept of the Planning Scheme with application site outlined in black(Overlay by SLA).

The Archaeological and Architectural Heritage Inventory, which accompanies the Planning Scheme, states,

“Although not listed on the NIAH or as a Protected Structure, Grange House is considered to be of significant architectural merit by reason of its architectural and local historic interest. The house makes a significant contribution to the architectural heritage of the area. Grange House should therefore be protected, retained and integrated as part of any development of the SDZ lands including its formal front garden and entrance setting.”

The proposed development envisages the reuse of Grange House for future employment use (c. 170 sq m). Office use is more likely to be sympathetic to the special character and integrity of the structure. This application seeks permission in principle for the adaptive reuse of Grange House for suitable office based employment uses. A more detailed application will then be made upon securing a suitable end user. We would submit that this proposal is consistent with the Key Objective for the Development Area for the promotion and adaptive re-use of Grange House.

We refer to the Cultural Heritage (Architectural & Archaeological) Chapter of the Environmental Impact Assessment Report enclosed with this application, providing detail on site investigations performed as well as detail on the Archaeological Heritage and Architectural Heritage of the proposed Part 10 application site.

14 SITE 5 STATEMENT OF CONSISTENCY- CLONBURRIS SDZ PLANNING SCHEME

Planning Report & Statement of Consistency

Site 5, Kishoge Part 10 Application
on behalf of South Dublin County Council

May 2025



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This Planning Report and Statement of Consistency has been prepared by McCutcheon Halley Chartered Planning Consultants (MHP) on behalf of South Dublin County Council (SDCC) to accompany an application to An Bord Pleanála under Section 175(3) of the Planning and Development Act (PDA) 2000 (as amended).

Permission is being sought for a proposed residential development on lands principally located within the Clonburris Strategic Development Zone (SDZ). The key objective is to deliver a high-quality residential development which will act as a catalyst to further development and the future growth of this key Urban Centre in south-west Dublin.

The proposed development consists of a Social and Affordable Housing Development on three distinct sites in SDCC's ownership, identified as Sites 3, 4 and 5. Separate design teams were appointed to progress development proposals for the three individual sites, working collaboratively to prepare this single Part X planning application.

This Planning Report and Statement of Consistency pertains only to the proposed development at Site 5. The development site encompasses two areas, referred to in this report as Sites 5A and 5B, separated by the existing arterial road Thomas Omer Way.

In brief, the proposed development at Site 5 comprises 236 residential units, with varying typologies, in a mixed tenure scheme comprising social housing units, affordable purchase units and cost rental units. The proposal also provides for all associated site development and infrastructural works, including internal access roads, car and bicycle parking, open space, hard and soft landscaping, foul and water services. Vehicular access to the site will be from Thomas Omer Way and off the R136 via the permitted Clonburris Northern Link Street (NLS) (Reg. Ref. SDZ24A/0033W).

The proposal for Site 5 has been developed by a highly experienced professional team, including:

- McCauley Daye O'Connell (MDO) Architects
- RPS Consulting Engineers
- LDA Design
- McCutcheon Halley Planning
- O'Connor Sutton Cronin (OCSC) Consultant Engineers
- Atkins Réalis
- Currie & Brown

The purpose of this report is to present details of the proposed development, demonstrate its consistency with the proper planning and sustainable development of the area, and detail how it complies with relevant national, regional, and local planning policies and guidelines.

An Environmental Impact Assessment Report (EIAR) accompanies this application and should be referred to in conjunction with the full suite of planning documentation, for a comprehensive assessment of the proposed development.

2. Site Context

The proposed development site is identified as Kishoge 'Site 5' located to the north of the South Western Commuter rail line and east of Grange Castle Road (Regional Road R136).

Site 5 comprises two areas, Sites 5A and 5B, shown in the aerial image in Figure 1.

Site 5A is situated on the south side of Thomas Omer Way, in the Townland of Kishoge. It is southeast of the R136 roundabout and south of the Carline Learning Centre. Kishoge Community College and Lynch's Park residential development are located to the east. It is further subdivided by the permitted Northern Link Street (NLS) which was granted under Reg. Ref. SDZ24A/0033W.

Site 5B is located on the northern side of Thomas Omer Way, in the Townland of Balgaddy. The Foxborough residential estate and new housing development at Omer Walk are situated to the north, and the Tor an Rí residential estate is located to the northeast.



Figure 1 Aerial image showing site context and indicative site boundaries in red

The lands consist mainly of grassland and scrub vegetation. Clusters of trees and hedgerows are also present across the lands, most notably in Site 5A at its western boundary with the R136, its northern boundary to Thomas Omer Way and in the south-east.

The topography within Site 5A varies considerably. The lands slope downward from the north-east to the south-west. Level changes of approximately 4 to 6 metres are also evident to the west along the R136. There is a drop from approximately 65.5 mOD on the roadside to approximately 59.2 mOD within the site. In the northwest of the site, immediately south of the ESB compound, there is a sharp level drop from around 61.7 OD to 59.1 mOD, attributed to the engineered fill used in the compound's construction.

In Site 5B, the existing ground elevations range from 58 to 60 mOD sloping down from the south-eastern side towards the north and north-west.

To the north of Site 5A are gravel/hardstand areas and internal access tracks. The central and southern parts of Site 5A also contain remnants of concrete block structures and debris (see Figures 2-3).



Figure 2 Site 5A photograph looking north-west at remnants of concrete block structures.



Figure 3 Site 5A photograph, looking north at concrete block wall.

An existing concrete sound barrier extends along the southern boundary of Site 5B, at its interface with Thomas Omer Way, shown in Figures 4 and 5.

ESB utility infrastructure is a notable feature of the site and has directly influenced the design approach. An electrical transmission tower and associated ESB compound are located to the immediate north-west of Site 5A (outside the boundary), and an electricity pylon is situated in the north of Site 5B. 38KV high voltage overhead transmission lines extend in an east-west alignment across the northern sections of Sites 5A and 5B.

This ESB infrastructure is effectively an unregistered wayleave, acting as a burden on the lands which is a constraint to development. In the absence of current proposals by ESB to relocate or decommission this infrastructure, the proposed layout

responds to this constraint. However, it is understood that the ESB intend to relocate and underground services in the future. The timeframe is not known at this stage, and therefore the proposed development accommodates this existing infrastructure to facilitate the delivery of new housing at these strategically located lands in the short term.



Figure 4 Site 5B photograph, looking south-west towards Kishoge Community College, shows the existing acoustic barrier at Thoms Omer Way, overhead power lines and ESB pylon.



Figure 5 Google Street View, looking east on Thomas Omer Way at the acoustic barrier that extends along the south boundary of Site 5B.

3. Pre-Planning Consultation

3.1 South Dublin County Council

A pre-planning consultation meeting with South Dublin County Council was held on June 18, 2024. The meeting was attended by members of the Design Team and representatives of the Council's Planning, Architects, Housing, Roads, and Parks Departments.

The Design Team presented details of the proposal to the Planning Authority, identifying key issues of relevance to the site layout and emerging design, as follows:

- 30-metre exclusion zone for ESB overhead power cables running across the northern section of Site 5A and Site 5B.
- Existing ESB compound located to the north-west of Site 5A.
- Provision for a future block along the northern section of Site 5A once the overhead powerlines have been decommissioned, as envisaged in the Planning Scheme.
- Integration with the elevated levels of the R136.
- Removal of the existing sound barrier along TOW to facilitate a strong building line/active frontage and improved setting.
- Relocation of the proposed vehicular entrance to Site 5B along TOW as per feedback from the SDCC Roads & Traffic Department.
- The size of the central park (public open space) in Site 5A, the discrepancy between masterplan layout and written text in the Planning Scheme.
- Future development on the KNE-S2 lands currently constrained by ESB infrastructure would likely necessitate the transfer of residential units from an adjoining sub-sector to ensure consistency with the Planning Scheme total dwellings parameters.
- The scheme comprises residential units, as per the Client brief. The Site 5A lands within the area designated for mixed-use (KUC-S2), do not include any non-residential uses.
- Consistency with Planning Scheme density standards, including the approach to density where lands within the site comprise a portion of the sub-sector.
- The eastern part of Site 5B, outside of the SDZ boundary, is subject to density standards in the County Development Plan and national guidelines rather than the Planning Scheme.

The Planning Authority's feedback is summarised below.

Planning Department

- The application documents should demonstrate that the retail/ employment floor space requirements in the Planning Scheme (applicable to subsector KUC-S2), can be achieved on the balance of the lands within the urban centre.
- Undertake a layout analysis of the sub-sectors, where appropriate, to demonstrate relevant parameters can be met.
- In relation to building heights, compliance is required with the relevant tables in Section 3 of the Planning Scheme which set out building height thresholds for the individual sub-sectors. The written text in these tables takes

precedence where a discrepancy with the Building Height Strategy map arises.

- If, as a result of the current proposal, it is envisaged that future development in KNE-S2 would trigger reliance on the transfer of residential units to be Planning Scheme compliant, details should be set out in the planning application. Any future transfer of units to KNE-S2 would preferably be from an adjoining residential sub-sector (KNE) rather than the urban centre (KUC).
- A master-planning exercise should be carried out to understand how the development targets and built form parameters in the Planning Scheme can be achieved in the context of the site and adjoining SDZ lands.

Roads Department

- Thomas Omer Way is an arterial link road (60kph) with no residential development along it. Housing fronting Thomas Omer Way is encouraged to improve the 'feel' of the street and help reduce vehicle speeds.
- The scheme should tie in with the school drops off and pedestrians crossing.
- Proposed roads and access arrangements within the scheme should align with any roads proposals for the wider lands, including the Northern Link Street.
- Provide details of proposed car parking strategy and parking ratios.
- Provide road and path cross sections.
- The scheme shall be designed to comply with DMURS and Taking in Charge standards.

Parks & Public Realm

- Green infrastructure links should be applied in the design of roadways/ paths, e.g. SuDS measures, trees, planting and grass-crete parking.
- The link from the school to the north of the site is a primary connection and needs to be developed further.
- Landscaping proposal should be further developed in the vicinity of the ESB compound and SuDS measures introduced.
- Where possible, retain existing trees throughout the site and provide details regarding the extent of removal.

All the matters discussed during pre-planning consultation were taken on board by the Design Team in the design development phase. In addition, specialist design team members consulted with representatives of the Council's works departments to address relevant technical matters.

3.2 ESB

Consultation with ESB has been undertaken regularly throughout the design phase to ensure that the proposed development responds appropriately to the technical requirements associated with the network of ESB infrastructure in and around the site.

Section 2 of the **Utilities Report** prepared by OCSC Consulting Engineers provides details regarding the existing ESB network and an on-site meeting that was held with ESB representatives to discuss matters related to the ESB compound, including access arrangements and setback requirements.

4. Proposed Development

4.1 Development Overview

A mixed-tenure social and affordable housing development is proposed on the site referred to as Kishoge 'Site 5'. The proposed residential development will be distributed across two parcels of land, identified as Sites 5A and 5B, principally located within the Clonburris SDZ, within the Kishoge Planning Scheme Area.

Site 5A is situated on the south side of Thomas Omer Way, in the Townland of Kishoge and includes lands within Development Area 6 Kishoge Urban Centre (sub-sector KUC-S2) and Development Area 10 Kishoge North East (sub-sector KNE-S2). Site 5B is located on the northern side of Thomas Omer Way, in the Townland of Balgaddy and within Development Area 6 Kishoge North East (sub-sector KNES1). The eastern part of Site 5B sits outside the SDZ boundary.

The development strategy is to create and deliver a high-quality, distinctive residential neighbourhood with its own character and sense of place that integrates successfully with surrounding development, maximises the site's natural attributes and achieves maximum efficiency of existing and planned infrastructure.

The proposed development will consist of:

1. Removal of derelict structures and hardstand areas in Site 5A, and removal of the existing acoustic barrier at Thomas Omer Way along the southern boundary of Site 5B.
2. Construction of a 6-storey over basement apartment block at the western extent of Site 5A with a total of 58 units, including 37 no. 1-bedroom units and 21 no. 2-bedroom units.
3. 35 houses, 110 duplex units and 33 triplex units as follows;
 - a. 35 no. 3-bedroom houses
 - b. 53 no. 2-bedroom duplex units
 - c. 57 no. 3-bedroom duplex units
 - d. 33 no. 2-bedroom triplex units
4. A total of 16,836 sq.m public open space comprising;
 - a. 3,101 sq.m public open space in Site 5A
 - b. 13,735 sq.m public open space in Site 5B
5. 219 car parking spaces total (with 20% provision for EV charging points), including 31 undercroft spaces to serve the apartments and 188 on-street spaces distributed throughout the site.
6. Secure bicycle storage for residents (1 space per bedroom) and 101 visitor cycle spaces.
7. Vehicular access to Site 5A will be provided from Thomas Omer Way via a new left-in-left-out junction at Lynch Lane. A second vehicular access point to

Site 5A off the R136 will be available via the Clonburris Northern Link Street (permitted under Reg. Ref. SDZ24A/0033W).

8. Vehicular access to Site 5B will be provided from Thomas Omer Way via a new signalised junction.
9. Hard and soft landscaping, internal roads, cycle and pedestrian routes, SuDS measures, drainage, open attenuation ponds, ESB substations, plant, waste storage areas, boundary treatments, lighting and all site development and excavation works above and below ground.

4.2 Key Development Parameters

Presented below is an overview of the key development metrics for Site 5

Table 1 Development Metrics

Site 5 Key Development Parameters	
Gross Site Area*	6.26 ha
Net Site Area**	4.14 ha
Total No. Units	236
GFA Residential (sq.m)	24,346 sq.m
Plot Ratio	0.3:1
Site Coverage	28%
Residential Density (Net)	57 uph
Residential Unit Mix	<ul style="list-style-type: none"> • 35 x houses (3-bed) • 110 duplex units: <ul style="list-style-type: none"> ○ 53 x 2-bed ○ 57 x 3-bed • 33 x triplex units (2-bed) • 58 apartments: <ul style="list-style-type: none"> ○ 37 x 1-bed ○ 21 x 2-bed
Unit Mix Summary	<ul style="list-style-type: none"> • 37 x 1-bed units (16%) • 107 x 2-bed units (45%) • 92 x 3-bed units (39%)
Public Open Space	<p>16,836 sq.m total public open space distributed as follows;</p> <ul style="list-style-type: none"> • Site 5A - 3,101 sq.m • Site 5B - 16,836 sq.m comprising: <ul style="list-style-type: none"> ○ 3,101 sq.m ○ 13,735 sq.m within the ESB exclusion zone (linear park)

Communal Open Space (external)	332 sq.m (to serve apartment building)
Building Height	2 to 6-storeys
Car Parking	219 spaces total: <ul style="list-style-type: none"> • 188 on-street spaces • 31 apartment block undercroft spaces
Bicycle Parking	<ul style="list-style-type: none"> • Resident cycle spaces - 1 per bedroom (527 total) • 101 visitor cycle spaces
<p>*Within the Red Line Boundary</p> <p>**Developable Area – excludes areas within Thomas Omer Way, Lynch Lane and ESB exclusion zone.</p>	

4.3 Site Layout

The proposed site layout, illustrated in the Figure below, seeks to:

- Create a safe and attractive residential neighbourhood with blocks laid out to provide strong building frontages and active street edges that facilitate passive surveillance of streets and open spaces.
- Ensure a legible and permeable neighbourhood that prioritises pedestrian and cyclist movement.
- Integrate pedestrian and cycle links that will provide connections to the local schools and colleges, Kishoge Railway Station and neighbouring residential areas.
- Make use of the existing overhead transmission lines as an opportunity to provide high-quality open spaces including a linear park.



Figure 6 Proposed Site Layout (Source: LDA General Arrangement Plan)

The proposed layout has been developed to ensure consistency with the Planning Scheme Framework. It is also informed by the established site context, most notably the topography, ESB infrastructure and the existing and planned road network.

Within Site 5A, the buildings are arranged around a centrally located public open space. The apartment block (BA01) in the west comprises a 6-storey building to provide for a robust urban edge along the R136, tapering down to a series of 2-storey duplex units to create a more intimate residential feel. Duplex and triplex units line the proposed internal streets, positioned to maximise passive surveillance of the public realm and public open space.

Vehicular access to Site 5A will be provided from Thomas Omer Way via a new left-in-left-out junction at Lynch Lane. A second vehicular access point off the R136 will be available via the Clonburris Northern Link Street (permitted under Reg. Ref. SDZ24A/0033W) that intersects the site.

Within Site 5A, the area under the power lines will remain a 'no-build' zone until the lines are relocated. With development on this portion of the site precluded in the short term, the proposed layout incorporates a landscaped park to enhance the setting and improve residential amenities.

The ESB requires two access points into their compound, and this is reflected in the proposed layout. Access will be provided on the south and east sides of the compound. Boundary treatments along the edge of the compound will comprise a concrete retaining wall and new planting to provide screening and soften its interface with adjacent residential areas.

To the north, residential units will occupy the southern part of Site 5B. The existing acoustic barrier at Thomas Omer Way will be removed and a series of 3-storey duplex and triplex units will be situated along the road frontage. New pedestrian access points will be provided at the Site 5B interface with Thomas Omer Way, significantly improving the accessibility of the lands and ensuring a legible and permeable development.

The proposed Site 5B layout will significantly enhance the setting along its southern boundary, activating the streetscape and improving the pedestrian experience at this location.

The vehicular entrance to Site 5B will be at Thomas Omer Way, via a new signalised junction. Within Site 5B, a local road with an east-west alignment will provide access to the residential units positioned to its north and south.

The ESB wayleave across the north of Site 5B constitutes a no-build zone. In response, the proposal includes a linear park within this part of the site. It will be an attractive landscaped public open space that will enhance residential amenities and provide a significant recreational and leisure space for new residents and the existing community. The layout provides for future pedestrian connections through the linear park to the Foxborough and Omer Walk housing estates.

The **Architectural Design Statement** and suite of drawings prepared by MDO Architects should be referred to for further details regarding the proposed development and the design approach.

4.4 Residential Units

The proposal incorporates a range of dwelling typologies including houses, apartments, duplex and triplex units that will respond to the needs of different households and create variety in built form across the site.

The total number and mix of dwellings are set out in the Table below.

Dwelling Type	1-Bed	2-Bed	3-Bed	Total
Apartments	37	21	-	58
Duplex	-	53	57	110
Triplex	-	33	-	33
Houses	-	-	35	35
Total Units	37	107	92	236

Table 2 Unit Mix & Numbers

The proposed unit mix as a percentage of the overall development is:

- 37 x 1-bedroom units (16%)
- 107 x 2-bedroom units (45%)
- 92 x 3-bedroom units (39%)

The proposed development will provide for a mix of housing tenures including social, affordable and cost rental units.

The tenure mix currently proposed is intended to be indicative only and will be finalised in advance of development commencing with input from the Council's Housing Department.

The indicative tenure mix is broken down as follows:

- 55 social housing units
- 68 cost rental units
- 113 affordable units

4.5 Landscape Proposals

This section provides an overview of the proposed public open space strategy and landscape proposals. A **Landscape Design Statement** prepared by LDA Design accompanies this application and should be referred to for further details.

Throughout the scheme are a series of attractive and usable open spaces, designed to respond to the active and passive recreational needs of residents. These vary in size, scale and programme, providing areas for children's play, exercise and open flexible space for residents, all underpinned by the need to promote biodiversity and sustainable practices.

The aim is to create a distinct and interactive public realm which will form connections between the proposed development and surrounding areas and will benefit from extensive landscaping.

Public open space will be distributed across the scheme in a series of high-quality areas that will serve the future residents and wider community.

Site 5A has been designed around an attractive, centrally located public park, which will be a focal point within the development. This landscaped open space will visually enhance the setting and provide a place for residents to gather and children to play.

The layout also incorporates a temporary open space within the wayleave under the overhead power lines in the north of Site 5A. The purpose is to ensure a high standard of residential amenities in the short term by creating an attractive open and facilitate future development on this part of the site when the overhead lines have been undergrounded/relocated.

A linear park is proposed within the ESB wayleave that extends along the north of Site 5B. This park will contribute significantly to the network of green infrastructure within the SDZ lands. It also forms an integral element of the proposed SuDS strategy for the site, featuring two attenuation ponds that have been carefully designed to facilitate informal play and recreation opportunities.

The proposed open space strategy is underpinned by the following design principles:

- The creation of good streetscape design, through the inclusion of attractive street trees (with underground tree pit details within hard surfacing areas), shrubs and hedging with year round interest, appropriate in scale and form.
- Ensuring integrated pedestrian and cycle links that connect with local destinations i.e. Kishoge Community College, Griffen Community College, Carline Learning Centre, Kishoge Railway Station, Urban Centres, Schools and neighbouring residential areas.
- Improving pedestrian and cycle experience along Thomas Omer Way
- Improving the pedestrian connections between Site A and Site B.
- The inclusion of play provision for differing age groups in a number of locations, including within the vicinity of the suds attenuation ponds, which are designed to be dry for the majority of the time.
- The selection of materials and treatments.

The open spaces will ensure high levels of legibility and ease of movement within the site and facilitate connectivity with the wider area including adjacent residential developments, Kishoge Community College and new developments in Kishoge Urban Centre. The streetscape design balances the need for practical use; road access, parking, pedestrian and cycle routes with an attractive tree-lined and planted character. The street layout and lighting proposals will facilitate good natural surveillance and the design has been carefully coordinated to maximise planting opportunities for street trees to create an attractive street environment.



Figure 7 Site 5A section showing proposed central park and tree-lined streetscapes (Source: LDA Drawing 'Sketch Section Site A')

The proposed public realm and network of open spaces throughout the site are designed in accordance with best practice, and will contribute to residential amenity by creating a high-quality attractive setting.

The image below highlights the core design principles which have informed the landscape strategy.



Figure 8 Landscape Design Principles (Source: LDA Proposed Landscape Design Report)

4.6 Water & Drainage Services

This section summarises the proposed surface water, foul water and water supply arrangements. An **Engineering Design Report** prepared by RPS Consulting Engineers accompanies this application and should be referenced together with the suite of engineering drawings for full details.

The proposed watermain and foul sewer design are in accordance with the applicable Uisce Éireann Codes of Practice. Uisce Éireann has issued Confirmation of Feasibility and a Statement of Design Acceptance which are appended to the RPS Design Report.

Water and drainage proposals for Site 5 have been designed to tie in with new watermain, foul, and surface water lines which will be delivered as part of the Clonburris Northern Link Street (NLS) and associated infrastructure works, permitted under Reg. Ref. SDZ24A/0033W. It is anticipated these services will be in place by the time construction of the Site 5 residential development commences.

4.6.1 Water Supply

The proposed development includes new watermain infrastructure that will connect with the existing and planned water supply network surrounding the site.

Site 5A will connect with the planned 180mm diameter polyethylene (PE) watermain which is to be installed on the south side of Thomas Omer Way and along Lynch Lane, as well as a 400mm diameter PE watermain to be delivered with the permitted Northern Link Street (granted under Reg. Ref. SDZ24A/0033W).

The proposed watermain serving Site 5B will connect with an existing 110mm PE watermain and a 100mm uPVC watermain situated to the north.

4.6.2 Wastewater

The proposed development will be served by an existing 225mm foul line along Foxborough Court to the north of Site 5B and a 300mm foul line along Lynch's Park/Northern Link Street to the south of Thomas Omer Way. Although not yet installed, it is anticipated that the water service and drainage networks facilitating development in Site 5A will be in place prior to construction.

Foul loadings from the proposed development are shown in the Table below. The maximum foul flow has been calculated as 6.3 litres/sec for Site 5A and 1.9 litres/sec for Site 5B. These values are based on a peak factor of 6.

Ref	No. of Units	Hydraulic Loading			
		I/d/u (+10%)	I/d	Flow I/s (DWF)	Peak Flow I/s (6DWF)
Site 5A	174	446	77,604	0.90	5.4
Site 5B	62	446	27,652	0.32	1.9

Table 3 Proposed Development - Foul Loadings

The minimum capacity of the proposed foul sewer network within the scheme is 17.3 litres/second in Site 5A and 15.4 litres/second in Site 5B, adequately catering for foul loadings that will be generated across the site.

4.6.3 Surface Water

Separate surface water collection networks are proposed for Sites 5A and 5B together with a suite of SuDS measures including detention basins, green/blue roof, permeable paving and bioretention tree pits.

The strategy for surface water management at Site 5 has been developed by RPS in close consultation with the Clonburris Infrastructure (CIL) design team to ensure the overall attenuation and SuDS strategy for Sites 3, 4 and 5 aligns with the agreed Surface Water Management Plan for the SDZ lands (formulated by DBFL in 2019/2020). This strategy involves the adoption of at-grade, nature-based SuDS attenuation features to promote biodiversity, integrate drainage solutions with landscape design and avoid maintenance issues associated with synthetic solutions.

The proposed surface water network for Site 5A comprises of a 225mm to 300mm diameter collection network discharging into a main 1050mm diameter surface water pipe running through the middle of the site. This pipe discharges collected site surface runoff into the adjacent existing main drainage systems.

For Site 5B, an in-situ surface water collection network is proposed via nature-based solutions. Collected site runoff will be attenuated first through the two attenuation ponds located in the north-west of the site before discharging into an existing 1050mm diameter surface water drainage pipe north via Foxborough Court to Balgaddy Road. Site surface runoff will be treated through a petrol interceptor before discharging into the detention basins.

Diversion of the existing 1050mm diameter storm pipes within the site is required to facilitate the development. As part of the development works, the pipes will be diverted into the proposed estate trunk roads with a 9m service wayleave over same for future maintenance requirements. The falls, flow rates, pipe diameters and manhole spacing will be maintained as per the current situation. There will be no additional flow into the pipe network and existing connections/catchments to these pipes from the wider area will continue to be facilitated.

An allowance of 20% increase in rainfall depth is accommodated in the design of the surface water drainage systems to cater for future climate change effects on rainfall volume.

There SuDS strategy also features rain gardens/swales in the central park in Site 5A and between the residential development and linear park in Site 5B. These additional measures will provide aesthetic variation and additional opportunities to enhance biodiversity.

Surface water generated from new hard landscaping and roofs on site will be directed to an onsite infiltration tank. Prior to entering the infiltration tank, the proposed surface water collection networks will outfall to a hydrocarbon interceptor and silt trap manhole.

Terraced housing and apartment buildings will incorporate appropriately sized soakaways to rear gardens to capture surface water runoff and allow it to infiltrate to ground.

Surface water from trafficked areas will be intercepted by a suitable petrol interceptor prior to entering the detention basins. In some instances, surface water from trafficked areas will enter tree pits before entering the drainage network.

4.7 Movement & Access

4.7.1 Roads

Site 5A will connect into the permitted Northern Link Street via four priority T-junctions. The primary vehicular access point is from Thomas Omer Way, from an existing junction at Lynch Lane in the northeast of the site.

Additional active travel (non-vehicular) connections from Site 5A to Thomas Omer Way are also provided for west of the main vehicular entrance.

The sole vehicular access point to Site 5B will be from Thomas Omer Way via a new signalised junction. The location of this entrance has been coordinated with a temporary junction to the south for the school and is positioned to ensure safe ingress and egress from the site without negatively impacting school drop-off zones and traffic layouts along Thomas Omer Way.

Active travel links are provided from the Site 5B frontage to Thomas Omer Way at four points located centrally and to the west of the site frontage. The removal of the existing sound barrier along this stretch of the road will facilitate these connections.

4.7.2 Proposed Access Junctions

Two access junctions are proposed to serve the new development at Site 5A, one will utilise the existing junction between Lynch Lane and Thomas Omer Way, while the

other will connect Grange Castle Road (R136) with the permitted Northern Link Street.

Site 5B will have one access junction connecting the proposed development to Thomas Omer Way. The access will be via a new signalised junction, fully designed in accordance with Section 4.4.3 of DMURS regulations, including signal phasing for pedestrians/cyclists/vehicles.

4.7.3 Pedestrian Access

Within the proposed development, a network of internal footways will be provided to facilitate the safe movement of pedestrians. All proposed footpaths throughout the development will have a minimum width of 2.2m, in excess of DMURS standards which identify a minimum footway width of 1.8m.

The proposed development includes 17 pedestrian crossings, ten located within Site 5A and seven within Site 5B.

In Site 5A, four will be controlled crossings situated at road junctions along the permitted Northern Link Street.

In Site 5B, there will be six uncontrolled crossings, together with one controlled crossing at the intersection with Thomas Omer Way. Two of the crossings in Site 5B are designed as 2-metre wide raised tables, and the remaining crossings will be at-grade. The raised table crossings are intended to function as courtesy crossings, in accordance with DMURS principles, as an effective means of creating a lower-speed environment. Featuring vertical deflection, these uncontrolled crossings allow pedestrians to assert a degree of priority over vehicular traffic. This design approach helps to calm traffic, enhances safety and encourages increased pedestrian and cyclist activity within the development.

The pedestrian crossings are designed taking account of visibility and sightlines for pedestrians, with parking spaces arranged to ensure clear lines of sight.

Figure 9 below shows a cross-section of a typical Local Street including the generously proportioned footpaths and planted verge creating a pedestrian friendly environment.

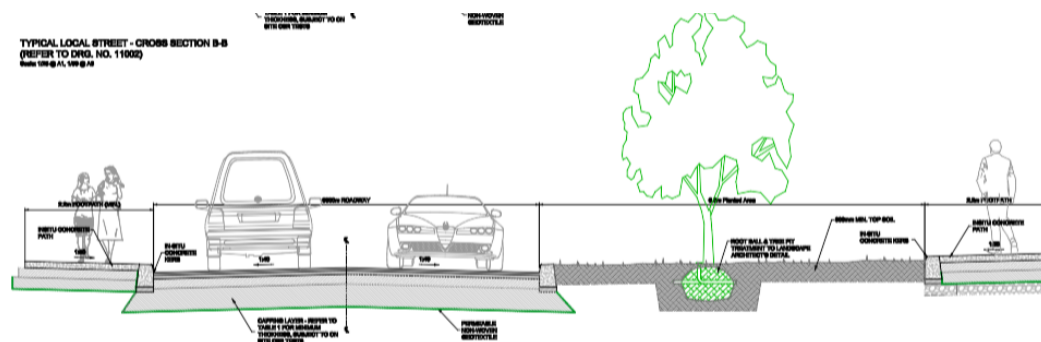


Figure 9 Typical Local Street Cross Section (Source: RPS Dwg No. KSG5-RPS-KSG5A-XX-DR-C-11021)

The design includes 'homezone' areas within the local streets of Sites 5A and 5B to create a safer, more pedestrian-friendly environment. These zones are intended to

encourage slower vehicle speeds and minimise conflicts between pedestrians and vehicles, enhancing overall safety and accessibility.

To distinguish these homezone areas, permeable paving will be utilised, providing a contrasting colour and texture that signals the transition from traditional roadways to shared spaces.

4.7.4 Cyclists

The design incorporates dedicated cycle lanes along the permitted Northern Link Street and Thomas Omer Way, facilitating safe navigation for cyclists through the surrounding estates.

Within the development, cyclists will have access to shared-use paths that allow for safe interaction with pedestrians at both controlled and uncontrolled crossings.

To further enhance accessibility, dropped kerbs will be provided at cycle shelters and parking areas, ensuring smooth transitions for cyclists. These features collectively aim to create a comprehensive cycling network that promotes safe and efficient movement throughout the development.

4.7.5 Parking Strategy

Car Parking

The streets are designed to create a hierarchy that prioritises sustainable modes of transport.

Parking will be strategically distributed across the development to ensure accessibility and convenience. A total of 219 parking spaces are proposed, including 31 spaces within the apartment building undercroft. 12 parking spaces (5%) will be universally accessible (UA) and 18 will be electric vehicle (EV) spaces.

To support the future rollout of electric vehicle charging facilities, underground ducting shall be installed for 100% of the on-street car parking spaces. This ensures that the necessary infrastructure is in place for the installation of additional chargers as needed.

Parking bays are designed according to DMURS standards. All parallel parking spaces will be a minimum of 2.4m wide and 6m long. All perpendicular parking spaces within the development are proposed to be 2.4m wide and 5m long. Undercroft parking spaces are 2.6m wide to account for the manoeuvrability requirement around columns.

Cycle Parking

Secure bicycle parking shall be provided throughout the development, designed in accordance with the Cycle Design Manual (CDM).

Bicycle parking will be secure and designed in a manner that integrates appropriately into the public realm.

The bicycle parking spaces includes:

527 long-stay spaces designed for the residents. Each unit is provided with a secure dedicated bicycle store.

101 short-stay spaces designed for ease of use by the general public. These spaces are distributed throughout the scheme in highly visible areas that are readily accessible.

4.7.6 Servicing

Emergency Vehicles

Auto tracking analysis has been carried out to ensure that all units within the development are accessible by emergency vehicles. The Autotrack drawings (included in Appendix D of the Engineering Services Report) illustrate the design considerations made to facilitate emergency vehicle access and demonstrate that fire tender can navigate all areas within the scheme effectively.

Larger vehicles may need to cross the centreline of intersecting streets due to the reduced corner radii. However, such manoeuvres are acceptable when turning into or between local or lightly trafficked link streets, as maintaining low vehicle speeds is prioritised. An Emergency Vehicle Access drawing has been included in Appendix D, demonstrating that a fire tender can navigate throughout the development and access all areas effectively

Bin Lorries

Assessments were carried out to ensure all units within the development are accessible by bin lorries and in accordance with the relevant requirements of Technical Guidance Document (TGD) B. Adherence to the approach outlined in the TGD is regarded as evidence of compliance with the relevant part of the Building Regulations.

Each house, duplex, and triplex will feature its own dedicated bin compound.

For the apartments, a communal bin store is proposed, where residents can deposit their refuse. The management company will be responsible for ensuring that bins are positioned safely for collection.

5. Strategic Planning Policy Context

5.1 Introduction

The application site is primarily situated within the boundary of the Clonburris SDZ Planning Scheme 2019. The Planning Scheme, as adopted, is in accordance with strategic planning policy and guidelines. Therefore, any planning application in compliance with the Clonburris SDZ Planning Scheme, is considered to be in compliance with strategic planning policy and guidelines.

For completeness, it is noted that under Section 170(2) of the PDA, the Planning Scheme will continue to apply to development in SDZs, superseding any contrary provisions contained in section 28 guidelines, including Specific Planning Policy Requirements (SPPRs), until the Planning Scheme is amended to integrate changes arising from the guidelines.

In this instance, part of Site 5B is located outside the SDZ boundary and is therefore subject to policies and objectives in the South Dublin County Development Plan (SDCDP) 2022-2028, rather than the Planning Scheme. Where a divergence arises with SDCDP policies due to the introduction of specific planning policy requirements (SPPRs) in section 28 guidelines, the SPPRs take precedence. Where a divergence occurs that is directly relevant to Site 5 proposal (the portion of Site 5B outside the SDZ), this report addresses compliance with the relevant policy requirement in the guidelines.

5.2 National Planning Framework

The National Planning Framework (NPF) was published in 2018 with the objective to achieve balanced regional development with a clear hierarchy and focus on residential and employment development in established urban centres and settlements. Over the lifetime of the plan, it forecasts that half a million additional homes are needed to accommodate projected growth.

The NPF's long-term vision aims to balance the provision of good quality housing that meets the needs of a diverse population by developing our cities, towns, and villages as attractive places to live both now and in the future. The plan embraces the principle of compact growth, targeting at least 40% of all new housing to be delivered within the existing built-up footprint of settlements or contiguous to existing developed lands.

The NPF recognises the important role of Clonburris as a strategic location for sustainable new housing delivery, reflected in one of the key future growth enablers for Dublin:

*Progressing the **sustainable development** of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, **Clonburris** and Clongriffin. (emphasis added).*

The Draft Revised NPF was published in July 2024¹. Compact growth, balanced growth promoting regional parity, and building accessible centres of scale remain core strategic objectives. The draft revision features policy updates aimed at addressing our climate action commitments and sectoral emission targets. Progressing sustainable development along high-capacity public transport corridors, remains a key growth enabler for Dublin:

Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high capacity public transport corridors focusing on large-scale Transport Orientated Development (TOD) opportunities particularly along high- capacity rail corridors within the metropolitan area

Of note, the Draft Revised NPF includes revised projections for future growth, indicating the population will increase to 5.7 million by 2030 and 6.1 million by 2040. To cater for this growth, it includes a housing delivery target of 50,000 additional homes per year to 2040 (NPO 42). Importantly, a further uplift in housing targets was announced by the Government on 6th November 2024, including a new target of 50,500 homes per year, scaling up to 60,000 homes in 2030 and thereafter².

For the Dublin Metropolitan Area, achieving these ambitious growth targets will also require significant greenfield development on sites that can be integrated with the existing built-up area of the city and serviced by high-capacity public transport. New housing delivery in Clonburris, a designated SDZ, is consistent with the NPF policy focus on sustainable compact growth. The proposed development will accommodate growth within the metropolitan boundary of Dublin, and offer new residents improved housing choice, transport mobility and quality of life.

5.3 Housing for All

The delivery of additional housing output remains a fundamental priority for the Irish Government and was the impetus for Housing for All – A new Housing Plan for Ireland (2021). The plan seeks to tackle current deficiencies in the housing sector through a series of measures to achieve the following:

- Support more people to own their own homes and increase affordability;
- Eradicate homelessness, increase social housing delivery and support social inclusion;
- Increase new housing supply; and
- Address vacancy and efficient use of existing stock.

Housing for All identifies a target for new housing delivery of 33,000 homes on average per annum to 2030, including c.6,000 affordable homes to be made available every year for purchase or for rent. Housing for All also aims to ensure provision of

¹ Amendments to the draft were made in response to public consultation and an Updated Draft Revised NPF was published on 5 November 2024.

² Source: Government Press Release <https://www.gov.ie/en/press-release/bd039-government-agrees-to-progress-amendments-to-draft-revision-of-national-planning-framework-ambitious-new-housing-targets/>

more than 10,000 social homes each year, with an average 9,500 new build social housing homes to 2026.

The proposed development at Site 5 will deliver 236 new homes in a variety of dwelling typologies within the suburbs of Dublin. This mixed tenure scheme comprising social housing, cost rental and affordable purchase units will therefore make an important contribution to the Housing for All targets.

On foot of the November 2024 announcement confirming a further upward adjustment to housing delivery targets, the Government advised its intention to introduce a new housing plan to accelerate the delivery of more than 300,000 new homes by the end of 2030³.

5.4 Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Area translates the NPF objectives at the regional level. It sets out the vision for growth (homes and jobs) and Regional Policy Objectives (RPOs) to shape growth and economic development for the Eastern and Midland Region (9 counties).

The Vision for the Region under the RSES is *“to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.”*

Aligned with NPF compact growth objectives, it targets 50% of all housing in Dublin to be provided within or contiguous to the built-up area of Dublin City and suburbs.

The RSES contains a Dublin Metropolitan Area Strategic Plan (MASP) which identifies Strategic Development Areas and Corridors that will be targeted for future growth. Situated along the South-Western Corridor, the MASP acknowledges the strategic importance of Clonburris for the phased delivery of housing, linked to the DART expansion programme.

The proposed large-scale housing development accords with the RSES by providing for new residential development at sustainable densities within a designated Strategic Development Area and Corridor. The Site 5 lands are contiguous to the built-up urban area of Lucan and accessible to Kishoge Train Station, served by Portlaoise to Heuston commuter services, and trains on the Newbridge/Hazelhatch to Connolly/Grand Canal Dock route.

5.5 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities were published in 2024 by the Department of Housing, Local Government and Heritage. The 2024 Guidelines replace the Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities issued under Section 28 of the PDA in 2009 which are now revoked.

³ <https://www.finegael.ie/programme-for-government-2025/>

These guidelines set out policy and guidance in relation to the planning and development of urban settlements aimed at creating sustainable residential development and compact settlements.

The guidelines outline key principles to ensure that developments are sustainable in terms of their density, accessibility to public transport and services, and placemaking. In terms of individual housing units, the guidelines provide principles to ensure a quality living environment, including separation distances, public open space standards, provision for car and bike parking and consideration of levels of daylight and sunlight.

For lands outside the SDZ Planning Scheme, where there are contrary provisions in section 28 guidelines and policies in the SCDP 2022-2028, the SPPRs take precedence and must be complied with.

6. South Dublin County Development Plan 2022-2028

6.1 Core Strategy

Site 5 is mainly within the designated Clonburris Strategic Development Zone (SDZ). Section 169 (9) of the Planning and Development Act 2000 (as amended) states:

A planning scheme made under this section shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded.

In accordance with the above, the Clonburris Planning Scheme 2019 is the principal statutory planning document for the subject lands and is deemed to form part of the South Dublin County Development Plan (SDCDP).

The Core Strategy details the population growth and housing allocation targets for the County. **Policy CS7** promotes the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

Of particular relevance in the Core Strategy is **CS7 Objective 4**. Its aim is:

To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs.

The Core Strategy includes a housing target of 5,189 units for Clondalkin, Clonburris and Grange Castle within the plan period 2022-2028.

Settlement Type	Neighbourhood Area / Settlement Name	2016 persons	2016 units and share (%)	Estimated Built 2016 to Q4 2020 and share (%)	Total Land (HA) 2022-2028	Total Housing (Units) 2022-2028 and share (%)	Total 2028 units and share (%)	Target 2028 persons and share (%)	Population Growth from 2016 persons No. (%)
Dublin City and Suburbs	Tallaght	71,350	24,080 (25%)	700 (12%)	39.84	1,865 (12%)	26,780 (22%)	76,525 (24%)	+5,175 (7%)
	Naas Road/ Ballymount (City Edge)	1,384	396 (0.4%)	15 (0%)	20.02	1,010 (6%)	1,421 (1%)	3,349 (1%)	+1,965 (142%)
	Templeogue, Walkinstown, Rathfarnham, Firhouse	78,166	28,503 (30%)	1,750 (30%)	50.39	1,677 (11%)	32,206 (27%)	85,264 (26%)	+7,098 (9%)
	Clondalkin, Clonburris and Grange Castle	44,500	14,869 (16%)	200 (3%)	119.78	5,189 (33%)	20,454 (17%)	55,206 (17%)	+10,706 (24%)
	Lucan, Adamstown, Palmerstown	59,000	19,069 (20%)	1,625 (28%)	80.85	2,673 (17%)	24,039 (20%)	68,483 (21%)	+9,483 (16%)
	Citywest	8,238	2,503 (3%)	1,164 (20%)	64.12	2,113 (14%)	6,502 (5%)	15,900 (5%)	+7,662 (93%)

Figure 10 Core Strategy Population & Housing Targets (Source: Table 11, SDCDP 2022-2028)

Of note, the Council's Two Year Progress Report (2024) indicates that 1,075 units were delivered in Clondalkin, Clonburris and Grange Castle during the first two years of the development plan period. This represents 21% of the total housing allocation target for this area.

The delivery of 236 residential units within Site 5 will therefore contribute to the population and housing targets for the County, within the settlement boundary of Dublin City and Suburbs, consistent with Core Strategy policy that promotes sustainable compact growth.

6.2 Land Use Zoning

In accordance with the SDCDP 2022-2028, lands within the Clonburris SDZ are zoned *'to provide for strategic development in accordance with approved planning schemes.'*

Accordingly, the Clonburris SDZ Planning Scheme is the principal document of relevance to that part of Site 5 within the SDZ boundary, outlining the applicable development management standards.

For the eastern portion of Site 5B which sits outside the SDZ, the land is zoned 'Existing Residential' (RES) in the SDCDP 2022-2028, with the zoning objective *'To protect and / or improve residential amenity'*. Residential use is permitted in principle in this zone.



Figure 11 Site 5 Land Use Zones (Source: SDCDP 2022-2028)

7. Consistency with Clonburris SDZ Planning Scheme (2019)

7.1 Introduction

The Clonburris SDZ Planning Scheme (2019) provides a statutory framework for the future residential, social, economic and environmental development of a new planned and sustainable community in South Dublin County.

All planning applications within the SDZ boundary shall be consistent with the Planning Scheme and shall have regard to the Development Plan. Planning Schemes form part of the County Development Plan for the area and any contrary provisions of the Development Plan are superseded by the Planning Scheme.

The subject lands within the SDZ are located in the Kishoge Planning Scheme Area. The Site 5A lands are within Development Area 6 Kishoge Urban Centre (sub-sector KUC-S2) and Development Area 10 Kishoge North East (subsector KNE-S2).

For Site 5B, the lands are within Development Area 6 Kishoge North East (sub-sector KNE-S1), save for the eastern portion that sits outside the SDZ boundary. Notwithstanding, development proposed on the eastern portion of Site 5B is directly informed by the development strategy for the wider lands and the key principles of the Planning Scheme masterplan.

This section of the report details the consistency of the proposed development at Site 5 with the relevant provisions of the Planning Scheme. To facilitate a comprehensive assessment, this section also refers to planning policies and development standards not contained within the Planning Scheme, where relevant.

7.2 Key Objectives

7.2.1 Development Area 6: Kishoge Urban Centre (KUC)

The south part of Site 5A is within Development Area 6 'Kishoge Urban Centre'. This area type is described in the Planning Scheme as follows:

The centre will contain a diverse, mixed use development, containing the main commercial and retail uses for the new Urban centre based around a public plaza and a transport interchange on the Outer Ring Road.

The key objectives for Development Area 6 seek to deliver mixed use development that will contribute to the creation of an active urban centre where local community, retail and employment uses are concentrated to serve the surrounding residential areas.

As the current proposal comprises residential uses only, it is of note that Site 5 occupies only a small portion of Development Area 6, as shown in the following Figure. The lands to the east of the R136 and the south of the rail line (indicated by the hatched red line) are designated as 'Retail Core'.

It is our view that the proposed development is compatible with the wider development strategy to provide for mixed uses in the Kishoge Urban Centre, as set out in Table 4.



Figure 12 Marked-up extract of the Function Concept Map showing outlined in red the extent of the Site 5 lands within KUC (Source: Figure 2.1.3, Clonburris SDZ Planning Scheme)

Table 4 Consistency with the Key Objectives for Development Area 6

Key Objectives	Site 5 Compliance
To develop a high quality mixed use centre to support the community of Kishoge.	Section 2.1 in the Planning Scheme concerns land use and density. Of particular relevance, Section 2.1.3 states that there are three basic land use areas and <i>"the types of development that will be 'permissible in principle' and 'open for consideration' in the three land use areas... represent the broad nature of land uses that are fixed for each Character Area and for the Development Areas"</i> .
To provide for significant commercial (non-retail) provision at areas of high accessibility to public transport.	Section 2.1.4 states <i>"Further to the land use map and tables presented in this section, the general distribution of land uses across the SDZ lands together with the planned location of critical community, civic and emergency service uses is further identified on the Function Concept Map (Fig. 2.1.3) and more precisely identified at in Chapter 3 (Development Areas)."</i>
To provide for local level retail to support the regular service and retail needs of the community of Kishoge.	Residential uses are listed as permitted in principle in Mixed Use areas, as per Table 2.1.1 and therefore the proposed residential development is compatible with the applicable land use designation.
To develop a multi-purpose civic facility for the community at Kishoge.	Further, it is evident that the land use strategy in the Planning Scheme directs the general distribution of uses across the SDZ and facilitates a broad range of development types within the land use areas. This strategy ensures that individual proposals will not be constrained by a prescriptive approach to land use, relying on the

Key Objectives	Site 5 Compliance
	<p>application of statistical and physical parameters to achieve the overarching objectives and manage development outcomes in each Development Area and the sub-sectors within.</p> <p>In that context, it is reiterated that Site 5 occupies a small portion at the outer edge of the Kishoge Urban Centre (c. 6.7%). Importantly, residential development at the site will not preclude the delivery of mixed use development across the wider lands.</p> <p>The provision of new housing at this location is consistent with objectives for mixed use areas aimed at creating viable communities by building critical mass and encouraging active travel across the site and surrounding residential areas.</p>
To ensure high levels of legibility and ease of orientation.	The proposed dwellings in this part of Site 5 will be accessible via new local roads that tie in with the existing and planned road network at Lynch Lane and the NLS. The tile is laid out to ensure a coherent approach that provides for the continuation of pedestrian paths to the residential development further north, ensuring high levels of legibility across the lands and ease of orientation.
To achieve high levels of permeability, particularly for pedestrians and cyclists.	<p>Given the nature of this tile, it is not possible to facilitate pedestrian and cyclist movement between the dwellings. However, pedestrian pathways at the edges of this tile that will tie in with planned pedestrian and cyclist facilities, ensure accessibility and encourage active travel in the urban centre as the surrounding lands are developed.</p> <p>The proposed layout will facilitate permeability across the wider lands when the adjoining areas are brought forward for development.</p>
To provide for transport interchange at the railway station, in particular, connecting rail, bus and cyclists.	The tile will benefit from direct access to the permitted NLS and associated infrastructure that includes pedestrian and cyclist facilities along the R136 and extending to Thomas Omer Way. Pedestrian and cyclist access to Thomas Omer Way will also be available via Lynch Lane. These connections will provide high levels of accessibility to Kishoge train station and local bus services.

Key Objectives	Site 5 Compliance
To provide intimately scaled focal/ activity spaces surrounding quadrants of the Urban centre.	The scale of development is considered appropriate for this tile, ensuring it will integrate effectively with the residential development proposed to the north of the NLS (within sub-sector KNE-S2). The new local roads
To achieve good levels of continuity and enclosure along the arterial routes, avenues and the urban spaces.	The layout of this tile ensures that the dwellings are positioned to provide a coherent building line. The scale of the units and their orientation provide a positive interface with the local street network and degree of enclosure as adjoining lands are developed.

7.2.2 Development Area 10: Kishoge North East (KNE)

Site 5A and Site 5B each contain lands in Development Area 10 'Kishoge North East', described in Section 3 of the Planning Scheme (pg. 125) as follows:

Mixed development area with medium density residential development, closer to the centre with low density on the perimeters. Small scale retail, commercial and community uses will be facilitated close to the schools and Park.

The Planning Scheme outlines a series of key objectives for Development Area 10 aimed at realising the planning authority's overarching vision and development strategy for Kishoge North East.

The following Table sets out the key objectives and provides a response which demonstrates how the Site 5 development is consistent with each.

Table 5 Consistency with the Key Objectives for Development Area 10

Key Objectives	Site 5 Compliance
To develop a high quality residential neighbourhood at Kishoge, integrating with existing housing.	The proposed development will create a new high-quality residential neighbourhood that has been carefully designed to integrate with existing housing estates surrounding the site. The scale and density of the proposed development respond to the established residential context and the layout will enhance permeability and facilitate connectivity with adjoining residential areas.
To provide locally accessible open spaces of local and strategic importance.	A series of attractive and usable open spaces are distributed throughout the scheme, designed to be highly accessible via the proposed network of pedestrian and cyclist pathways. The open spaces will ensure high levels of legibility and facilitate connectivity with the wider area including adjacent residential developments.

Key Objectives	Site 5 Compliance
	<p>The centrally located public park in Site 5A will be a locally important open space, creating a focal point for residents and providing an area where local children can play.</p> <p>The linear park in Site 5B will be of strategic importance, extending the strategic green corridor across Thomas Omer Way and improving the accessibility of existing residential estates further to the north.</p>
To ensure high levels of legibility and ease of orientation.	The development has been designed to ensure high levels of legibility, with a clearly defined network of streets, open spaces, cycle paths and pedestrian accessways, that allow for ease of orientation.
To provide a new Link Street/avenue as part of the main connection between Kishoge and Clonburris urban centres.	<p>Although outside the scope of this application, the recently permitted Clonburris NLS will achieve the key objective of providing a new link street/avenue between Kishoge and Clonburris urban centres.</p> <p>The proposal has been carefully coordinated to integrate the NLS and its associated infrastructure into the design and layout. Delivery of the NLS will significantly enhance the accessibility of Site 5A and facilitate improved connectivity to the surrounding area.</p>
To prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue.	<p>Circulation throughout the site is provided via a comprehensive network of pedestrian pathways and connections along the streets and open spaces which will enhance accessibility and encourage active travel.</p> <p>The proposed layout and removal of the acoustic barrier at Thomas Omer Way will facilitate new connections and enhance the setting along this road. These changes will improve the experience of pedestrians and cyclists and provide a safer route to Kishoge Community College for students travelling from residential areas to the north of Thomas Omer Way.</p> <p>The proposed new pedestrian connections at Thomas Omer Way and the R136 will facilitate high levels of accessibility to local bus and rail services.</p> <p>The inclusion of homezones across the scheme will create shared spaces that meet the needs of</p>

Key Objectives	Site 5 Compliance
	<p>pedestrians, cyclists and residents, slowing traffic by design and removing through traffic.</p> <p>The proposed pedestrian and cycle network will also enhance accessibility for the established housing estates which surround the site.</p>
To provide for a range of housing along the new avenue and local streets including homezones.	The scheme provides for a range of housing along the permitted NLS and proposed network of local streets and homezones. The proposed mix of houses, apartments, duplex and triplex units will respond to the varying needs of future residents, catering to households and families of varying size, composition and life stages.
To provide a distinctive, diverse and quality frontages to Thomas Omer Way, the avenues/Link Streets and the strategic open spaces.	The proposal includes a range of dwelling typologies with varying designs along the NLS and local streets. The proposed mix of houses, apartments, duplex and triplex units will ensure architectural diversity and distinctiveness across the site. Dwellings are orientated to present continuity in building lines and strong building frontages along the streetscape. Dwellings are also positioned to facilitate good passive surveillance of open spaces
To provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake to enhance green and blue infrastructure and ecological connectivity.	<p>The surface water strategy incorporates SuDS measures including detention basins, green/blue roof, permeable paving and bioretention tree pits.</p> <p>The proposed SuDS strategy includes two attenuation ponds in the linear park at Site 5B that have been carefully designed to facilitate informal play and recreation opportunities.</p> <p>There are also rain gardens / swales incorporated into the central park in Site 5A and between the residential development and linear park in Site 5B. These additional SuDS features will provide aesthetic variation and additional opportunities to enhance biodiversity.</p>

7.3 Land Use & Density

7.3.1 Types of Development

Figure 2.1.2 in the Planning Scheme includes the Land Use Area Map. The subject lands in Development Area - 10 Kishoge North East are designated for 'Primarily Residential' use.

The south part of Site 5A is within Development Area 6 - Kishoge Urban Centre, designated for 'Mixed Use' development.

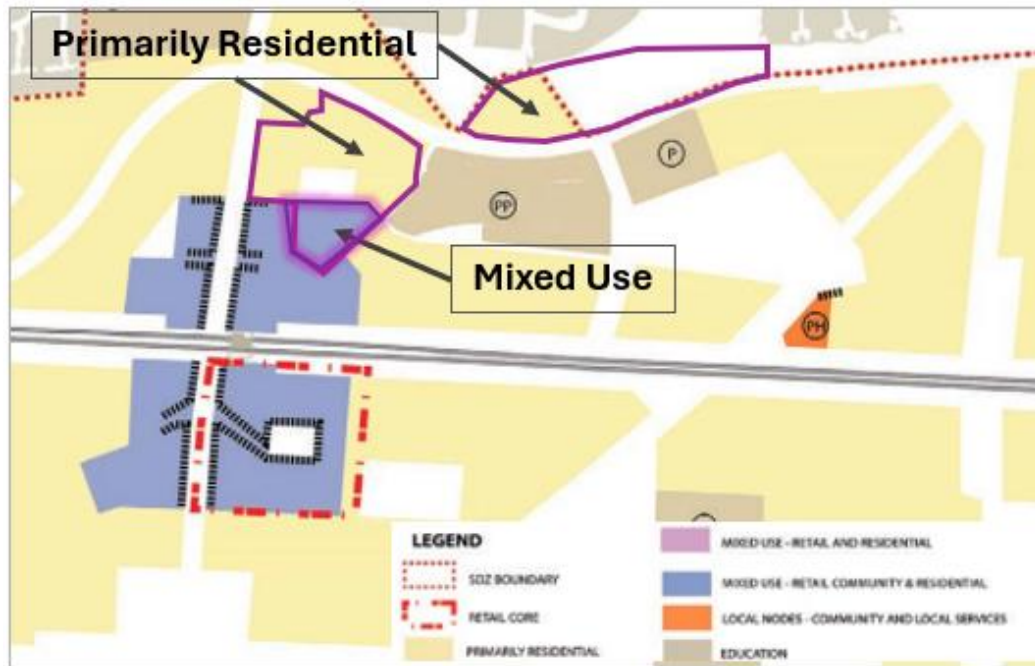


Figure 13 Extract of Planning Scheme Land Use Area Map, showing areas of Site 5 designated for 'Primarily Residential' and 'Mixed Use' development.

The Planning Scheme identifies residential uses as permitted in principle in areas designated for Residential and Mixed Use, subject to further assessment against the relevant requirements of the Planning Scheme.

Accordingly, the proposed residential development comprising a mix of apartments, houses, triplex and duplex units is consistent with the relevant land use objectives for the site.

7.3.2 Extent of Development

The Site 5 lands are distributed across multiple sub-sectors, including part of KNE-S1, most of KNE-S2 and part of KUC-S2, as shown in Figure 12. As noted elsewhere in this report, the eastern part of Site 5B is not within the SDZ and therefore, is not subject to the specific development parameters in the Planning Scheme.

Detailed in Table 6 are the development parameters that apply to Site 5. The lands are mainly located in Development Area 10 (Kishoge North East) and the site also extends south into Development Area 6 (Kishoge Urban Centre).

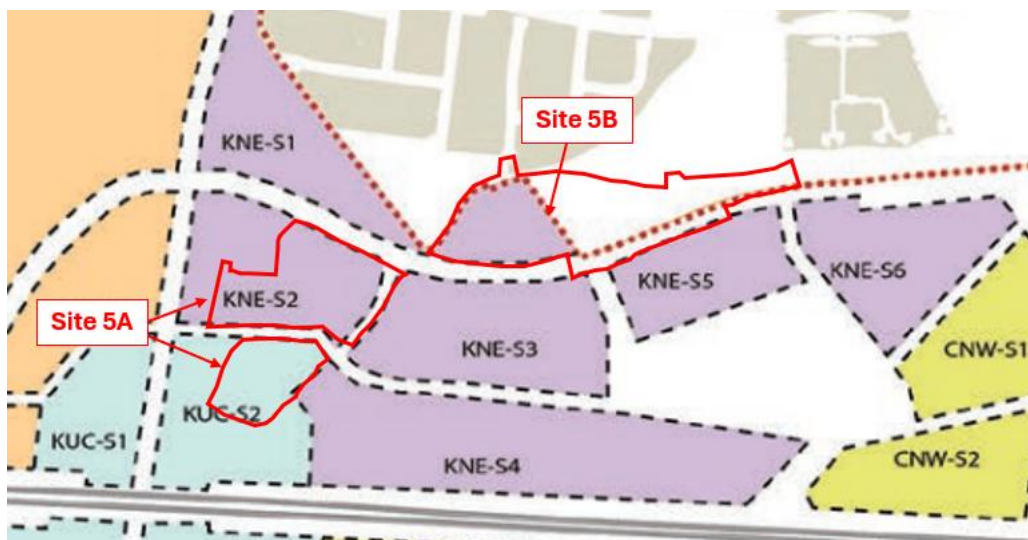


Figure 14 Marked-up extract of the Development Areas and Sub Sectors Map showing the Indicative Site 5 boundary overlaid (Source: Figure 2.1.4 Clonburris SDZ Planning Scheme)

Table 6 Extent of Development according to sub-sector

	KUC-S2		KNE-S1		KNE-S2	
	Req'd	Proposed	Req'd	Proposed	Req'd	Proposed
Average Net Density - Low Margin (-5 DPH)	65	59	48	55	49	60
Average Net Density - High Margin (+5 DPH)	125		58		59	
Total Dwellings (Low Margin)	181	44	168	40	126	130
Total Dwellings (Target)	265		186		138	
Total Dwellings (High Margin)	349		203		152	
Retail GFA (sqm) (Maximum)	300	0	-	N/A	-	N/A
Employment GFA (sqm) [Non-retail - (Minimum)]	2,400	0	-	N/A	-	N/A
Community / Civic Building GFA (sqm) (Minimum)	-	N/A	-	N/A	-	N/A
Local Parks and Square (sqm) (Minimum)	-	N/A	3500	3,414**	2700	3,101
School Sites (Existing or Proposed)	-			2		
**Inclusive of 2,920 sq.m public open space beneath the overhead ESB lines.						

Compliance with the development parameters applicable to each sub-sector are dealt with in the sections below.

7.3.3 Unit Numbers

The Planning Scheme prescribes the total number of dwellings for each Development Area and the individual sub-sectors. It identifies a minimum (low margin) and maximum (high margin) number of residential units, as well as a total dwellings target. Residential unit numbers are based on an allowable margin within a prescribed density range. The Table below sets out the number of units within Site 5 according to sub-sector.

Table 7 Total Dwellings according to sub-sector

Sub-Sector	Total Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)	Proposed No. Units
KUC-S2	181	265	349	44
KNE-S1	168	186	203	40
KNE-S2	126	138	152	130
East of Site 5B (outside SDZ)	-	-	-	22
Total				236

KUC-S2: 44 units are proposed within this subsector, below the prescribed thresholds, including the low margin of 181 total dwellings. Site 5 occupies only part of KUC-S2, however, a Part 8 proposal providing for 43 residential units within this sub-sector was permitted on 11 November 2024 (Pl. Ref. SD179A24/0004).

Together, the two schemes would bring the total number of units in KUC-S2 to 87, leaving a balance of 94 units that will be required across the remainder of KUC-S2 to ensure consistency with the total dwellings required (low margin).

To enable consideration of this proposed development in the context of the relevant parameters, a master-planning exercise was undertaken by MDO in conjunction with South Dublin County Council to identify an indicative development strategy for the wider lands that would facilitate the prescribed dwelling numbers.

Section 3 of the Architectural Design Statement addresses the masterplan study. The indicative masterplan layout provides for more intensive forms of development incorporating apartment buildings in the west and south of KUC-S2. These lands are earmarked for higher residential densities due to their accessibility to Kishoge train station. Taller buildings along the western boundary of KUC-S2 adjacent to the R136 would also ensure an appropriate design response to the arterial road setting by creating a robust urban edge.

This approach in the masterplan is also consistent with the Planning Scheme building height strategy which envisages taller buildings along the interface of KUC-S2 with the R136.

KNE-S1: The proposal includes 40 dwellings within this sub-sector, below the applicable target of 168 total dwellings (low margin). However, the lands occupy only part of the sub-sector. Additionally, the development potential of Site 5B is also constrained by the presence of overhead power lines, limiting the extent of development that can be achieved in the north of the site. The design response has been to create a linear park that will form a strategic green corridor and provide a significant amenity for the local community.

The proposed number of dwellings in KNE-S1 is considered appropriate because the balance of the KNE-S1 lands to the west provides scope to achieve the requisite number of dwellings when brought forward for development. As discussed further below, the density currently proposed in KNE-S1 sits comfortably within the appropriate range, at the upper end of the relevant threshold.

KNE-S2: 130 units are proposed within this sub-sector. The proposed number of units is at the lower end of the prescribed threshold for KNE-S1, which is subject to a low margin of 126 dwellings, a high margin of 152 dwellings and a target of 138 total dwellings. Site 5 occupies most of this sub-sector, with the area occupied by the ESB compound (outside the site boundary) comprising the balance of KNE-S2.

It is noted that the proposed development incorporates a temporary public open space north of KNE-S2, adjacent to Thomas Omer Way. This open space occupies the no-build zone beneath the overhead power lines traversing Site 5A, precluding additional units from being provided on this part of the site. When the ESB infrastructure is relocated in the future, the balance of KNE-S2 lands currently constrained by ESB infrastructure will be available for development.

Factoring in the total dwellings target of 152 units (high margin) would facilitate the delivery of an additional 22 units on the balance of lands within this sub-sector. Having regard to relevant design parameters (such as building heights and building lines), it is anticipated that 22 additional units on the remaining KNE-S2 lands would be insufficient to facilitate consistency with the specific development parameters related to built form.

7.3.4 Transfer of Residential Floorspace

Should the balance of lands in KNE-S2 that are currently constrained by ESB infrastructure become available for future development, the need for a transfer of residential units would likely be triggered to ensure consistency with the applicable design parameters in the Planning Scheme.

Section 2.1.4 of the Planning Scheme provides for the transfer of up to 10% of the max. residential units allocated in any sub-sector to an immediately adjacent sub-sector, as follows:

Subject to no net loss of units within a Development Area and the achievement of the built form objectives, the Planning Authority may allow up to 10% of the maximum residential units allocated in any Sub Sector to be transferred to an immediately adjacent Sub Sector.

To facilitate additional development capacity on the balance of the lands in KNE-S2, it is therefore considered appropriate to make provision for a future transfer of units. This strategy would facilitate the future transfer to KNE-S2 of up to 20 units from the

adjoining sub-sector KNE-S1 (10% of the 203 high margin) or up to 35 dwellings from the immediately adjoining sub-sector KUC-S2 (10% of the 349 high margin).

The Planning Scheme allows this 'transfer' approach, subject to the relevant land owner's consent being submitted with the application. In this instance, South Dublin County Council owns all the lands within KNE-S1, KNE-S2 and KUC-S2, and is well-positioned to manage the distribution of residential units across these sub-sectors.

It is therefore proposed to transfer 20 units from the dwelling allocation for KNE-S1 to KNE-S2, allowing for a total of 172 units (maximum) on the lands and ensuring that future development on the balance of lands within this sub-sector will align with the applicable development objectives and design parameters.

A transfer of units from KNE-S1 (rather than KUC-S2) is considered appropriate given its location at the outer edge of the SDZ lands further from the Kishoge train station and designated retail core in Kishoge Urban Centre.

It is also highlighted that both sub-sectors KNE-S1 and KNE-S2 are located within Development Area 10

7.3.5 Non Residential Development

Employment and Retail Floorspace

In accordance with the Planning Scheme, non-residential floor space is required in sub-sector KUC-S2, aligned with the aim of providing for mixed-use development in Kishoge Urban Centre. As set out in Table 2.13.1 of the Planning Scheme, 300 sq.m of retail floorspace (maximum) and 2,400 sq.m for employment uses (non-retail) are required within this sub-sector.

This proposed development provides for an entirely residential scheme, responding to the significant demand for social and affordable housing. Although this application does not incorporate non-residential uses, the subject site occupies only part of KUC-S2. For the reasons set out herein, it is considered reasonable for the required non-residential uses to be accommodated on adjacent lands within this sub-sector when the lands are brought forward for development.

As detailed in Section 7.2.2 of this report, the proposed development of residential units on this portion of the Kishoge Urban Centre is compatible with its designation for mixed-use development.

Further, non-residential uses on the adjoining lands to the west and south are compatible with the key principles in Section 2.4 of the Planning Scheme which seek to concentrate non-residential uses in the Kishoge Urban Centre to lands both within and adjoining the retail core, as follows:

*To promote Kishoge Urban Centre as a primary urban centre in the Planning Scheme by **directing higher order retail, retail services, residential, cultural, leisure, financial, public administration, restaurants/bars, entertainment and civic uses within and adjoining the Core Retail Area** of this centre;*

(Emphasis added)

The proposed residential development within part of KUC-S2 will not preclude the future delivery of retail and employment uses on the balance of lands in this sub-sector. Indeed, the concentration of higher-density residential development in

conjunction with retail and employment floorspace to the west and south of KUC-S2 is considered an appropriate development strategy that will ensure a vibrant and viable mixed-use core. The delivery of residential development on surrounding lands in the interim, will contribute to the critical mass of population needed to support retail and other commercial uses in the Kishoge Urban Centre.

Childcare

As detailed in Section 2.7 of the Planning Scheme, childcare facilities are required to meet the needs of the evolving population in Clonburris and Kishoge. The Scheme also acknowledges the need for flexibility and the role of market factors in the delivery of quality sustainable facilities. It therefore provides for an approach to early childhood care that combines area-based and market-led provision.

A key driver of commercial viability for childcare services is the size and capacity of the facility. This Part X planning application therefore provides for two childcare facilities at Sites 3 and 4. These proposed facilities will serve the needs of the wider development. The documentation submitted with this application in respect of Sites 3 and 4 should be referred to for full details.

7.3.6 Residential Density

Section 2.15 of the Planning Scheme provides for the calculation of Residential Density according to sub-sector. It contains density ranges or thresholds based on a density target which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, -5 dph) to facilitate a degree of flexibility. A wider range of minimum and maximum densities is facilitated in Kishoge Urban Centre.

Table 8 provides a breakdown of the proposed density within Site 5, according to sub-sector. The densities shown are in accordance with the calculation of Net Development Area as set out in the Planning Scheme, which disregards strategic parklands, canal corridors, schools, and existing residential development from the Gross Development Area.

Table 8 Residential Density according to sub-sector

Sub-Sector	Average Net Density - Low Margin (-5 dph)	Average Net Density - High Margin (+5 dph)	Net Development Area	Proposed Density
KUC-S2	65	125	0.74 ha	59 dph
KNE-S1	48	58	0.73 ha	55 dph
KNE-S2	49	59	2.15 ha	60 dph
East of Site 5B (outside SDZ)	-	-	0.52 ha	42 dph

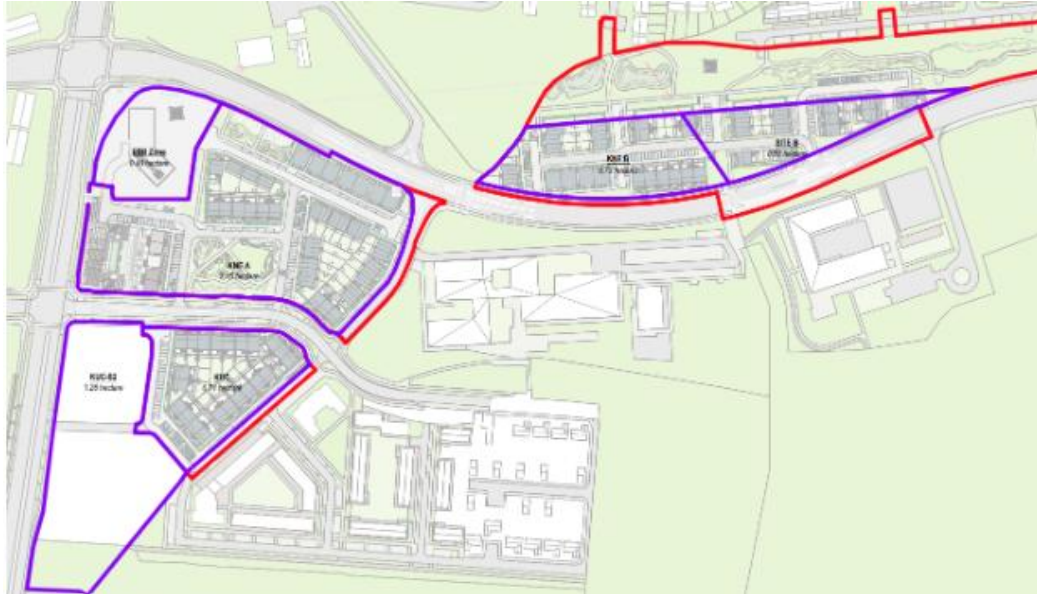


Figure 15 Net Development Area within each sub-sector, shown outlined in purple

Figure 15 shows the Net Development Area outlined in purple for each of the relevant subsectors in Site 5. It is noted that Lynch's Lane is excluded from the Net Development Area, including the area where it is proposed to be extended to the south adjacent to KUC-S2.

Excluding the Lynch Lane lands from the calculation of net density is consistent with the Planning Scheme. Figure 16 provides a marked extract of Figure 2.1.4 in the Planning Scheme (Development Areas and Sub Sectors Map) showing that the existing portion of Lynch's Lane is not captured in either KNE-S2 or KNE-S3. In the case of its proposed extension south, it is highlighted that the same area was included within the red line boundary of the immediately adjacent development permitted under SDZ179A24/0004 (see Figure 17).

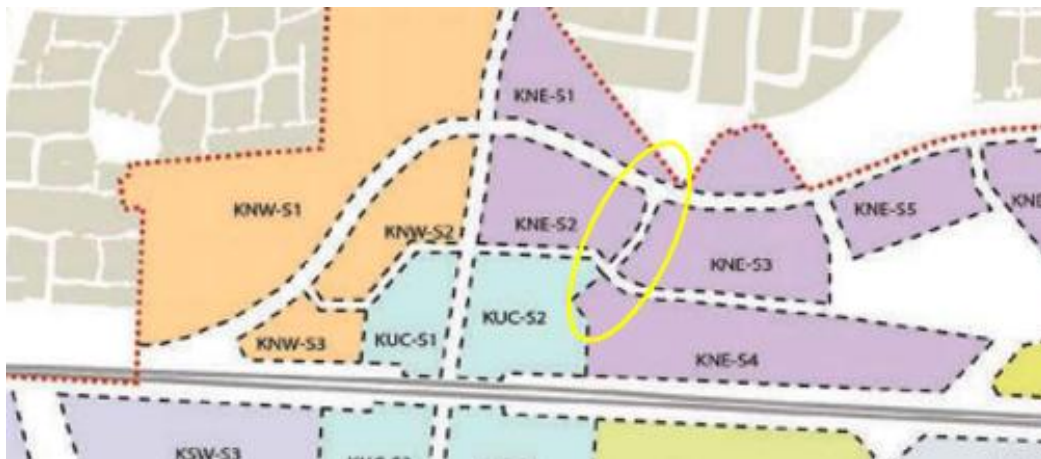


Figure 16 Marked Up Extract of Figure 2.1.4 in the Planning Scheme (Development Areas and Sub Sectors Map), highlighting the location of Lynch's Lane where the existing section of the road is excluded from the Sub Sector areas



Figure 17 Permitted Site Layout of adjoining site to the east, capturing the proposed extension of Lynch's Lane along its western boundary

On page 8 of the planning statement for the permitted development (prepared by HRA Planning), it is made clear that the area of the proposed Lynch's Lane extension was included within the Net Development Area for the purpose of calculating density, as follows:

...for calculation purposes "Net Development Area comprises Gross Development Area excluding strategic parklands, canal corridors, schools and existing residential development". Given that the totality of the subject site is proposed for development and strategic parklands are to be accommodated on other sites within the Planning Scheme, in this instance the gross and net development areas are the same.

Having regard to the above, it is appropriate the the full extent of Lynch's Lane, existing and proposed, be excluded for the purpose of calculating Net Development Area in this current application.

KUC-S2: As indicated above, the residential density standards in the Planning Scheme are prescribed according to sub-sector, noted in section 2.1.5 as follows:

*To allow for more accurate management of densities and ensure that higher densities are achieved within appropriate areas, **densities under this Planning Scheme are prescribed according to Sub Sector** (as Development Areas are divided into Sub Sectors - refer to Figure 2.1.4). **Development within each Sub Sector shall be consistent with the density margins** set out in Table 2.1.8. In the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector. Kishoge Urban Centre (KUC) and Clonburris Urban Centre (CUC) facilitate a wider range of minimum and maximum densities. Residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development). (Emphasis added)*

The proposed residential density within KUC-S2 is 59 dph⁴, slightly below the low margin density target of 65 uph. We consider this a minor shortfall which does not preclude consistency with overall residential density standards for KUC-S2.

A key consideration in determining whether the shortfall is a material departure from the prescribed residential density standards is the compatibility of the proposed development with the achievement of the applicable standards, as they apply to the whole sub-sector. In this respect, it is of relevance that all the land within KUC-S2 is in the ownership of South Dublin County Council.

As highlighted in section 7.3.3 of this report, the Site 5 development strategy has been informed by a master-planning exercise which demonstrates that the current proposal will not prejudice future development in this sub-sector. The indicative masterplan provides for higher residential densities on the wider KUC-S2 lands to the west (along the frontage to R136 where greater building heights are sought) and to the south (closer to the train station).

The masterplan confirms that the requisite unit numbers to ensure consistency with the overall dwelling target and density standards for KUC-S2, can be comfortably accommodated when the balance of the lands measuring 1.52 ha⁵ are brought forward for development. We therefore contend that the quantum of development proposed in KUC-S2 to date is compatible with the extent of development envisaged for the sub-sector.

Applying the dwelling target of 265 units means that 178 additional units⁶ would be required on the remaining lands within KUC-S2, which would achieve a density of 117 uph on the balance of lands in the sub-sector. This higher density is considered appropriate given their location relative to the retail core, train station and R136 arterial road. It also remains comfortably within the allowable density margin, demonstrating that the minor density shortfall currently proposed will not translate into future inconsistency with the applicable high margin density standard (125 dph) for this sub-sector.

This proposal is, therefore, considered satisfactory with respect to density. The minor shortfall in this instance represents a *de minimis* departure from the Planning Scheme density standard as it applies to KUC-S2, as it is compatible with the prescribed density targets applicable to the whole sub-sector.

KNE-S1: The proposed development achieves a density of 33 dph when all the Site 5B lands situated in KNE-S1 (1.2 ha) are included in the calculation. Alternatively, If the lands within the ESB exclusion zone are omitted for the purpose of calculating Net Site Area, the scheme achieves a density of 55 dph in this part of the site, within the prescribed density range of 48 to 58 dph.

It is noted that this application makes provision for a future transfer of 20 units from the dwelling allocation (high margin) for KNE-S1 to sub-sector KNE-S2. The current

⁴ The gross development area is 0.8 ha, reduced Based on net development area of 0.74 ha.

⁵ The stated net development area of KUC-S2 is 2.79 ha, reduced by 0.8 ha (gross development area in this current application) and 0.64 ha (gross/net development area under SD179A24/0004).

⁶ Overall KUC-S2 dwelling target of 265 units is reduced by 87 units when this proposed development and permitted development on the adjoining site (SD179A24/0004) are taken into account.

proposal includes 40 units in KNE-S1, and factoring in the future transfer of 20 units, leaves an additional 143 dwellings from the high margin allocation of 203 units to be delivered within the sub-sector.

The Planning Scheme confirms that KNE-S1 has a net site area of 3.5 ha and when this is reduced by the portion in Site 5B (1.2 ha), the balance of the lands measure 2.3 ha⁷. Delivery of the remaining 143 units allocated to this sub-sector would see the remaining lands in KNE-S1 achieve a density of 62 dph, which is considered appropriate in the context of the site's characteristics and ensuring that future development in KNE-S1 can be accommodated in accordance with the applicable density range⁸.

KNE-S2: The proposed development achieves a density of 57.8 dph based on the full extent of Site 5A lands within KNE-S2 (2.25 ha) and is therefore within the prescribed density range of 49 to 59 dph. The proposed future provision for the transfer of 20 residential units to KNE-S2, allows for up to 172 units to be delivered in this sub-sector. The resultant density would be 67 dph which exceeds the average net density (high margin) of 59 dph for KNE-S2. However, a slight divergence from the dwelling target (high margin) and related density threshold is inevitable in any scheme availing of a residential unit transfer from an adjoining sub-sector, as provided for in the Planning Scheme, will inevitably result in a slight divergence from the dwelling target (high margin) and related density standards.

Notwithstanding, a density of up to 67 dph is not considered excessive in the context of the site's characteristics and relevant objectives in the Planning Scheme which aim to create a robust urban structure, with buildings of scale presenting strong building frontages to arterial roads.

Site B (outside the SDZ): The proposal is achieving 42 dph in the eastern extent of Site 5B. This part of the scheme is outside the SDZ boundary and is subject to the applicable policies concerning density in SDCDP 2022-2028 and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

The SDCDP (including South Dublin County's Building Height and Density Guide in Appendix 10) does not contain prescriptive density targets. Rather, it focuses on a sustainable, design-led approach that is informed by a contextual analysis of the site.

The Sustainable Residential Development and Compact Settlements Guidelines (Table 3.1) recommends densities generally of 50uph and upward in the 'urban

⁷ The Planning Scheme notes that for calculation purposes, the Net Development Area identified for each sub-sector comprises Gross Development Area, less strategic parklands, canal corridors, schools and existing residential development. On page 78 of the Planning Scheme, it is noted that the design assumes the future undergrounding of overhead power lines east of Grange Castle Road. It is therefore concluded for the purpose of calculating density that the area within the ESB exclusion zone is captured within the Net Development Area.

⁸ It is noted that the Carline Learning Centre is located within KNE-S1, and its presence on site pre-dates designation of the lands at Balgaddy and Clonburris as a site for the establishment of an SDZ. The Planning Scheme does not appear to factor in this existing use to the development parameters for KNE-1. In any case, it is outside the scope of this planning application to address the extent to which the Centre may affect overall compliance with the Planning Scheme.

neighbourhoods' of Dublin, that includes lands within 1,000 metres (1km) walking distance of existing or planned rail services.

Importantly, the application of the density ranges recommended in the Guidelines, within statutory development plans and in the determination of individual planning applications, is a matter for the planning authority, based on considerations of centrality and accessibility to services and public transport, and considerations of character, amenity and the natural environment.

This flexibility is intended to ensure that the quantum and scale of development integrate successfully into the receiving environment, and supports the delivery of compact 'own door' housing and a greater range of affordable housing options.

The proposed density in the eastern part of Site 5B responds to the site context and the selected dwelling typologies provide for own-door social and affordable housing units.

The proposed building heights tie in with those provided for on the adjoining SDZ lands (the western extent of Site 5B) ensuring an appropriate transition in scale between Site 5B and the established residential estates to the north and east.

As highlighted by the Figure below, the quantum of development is also constrained by the irregular shape of the lands which limits the 'developable area' and is further eroded by the internal local access road.



Figure 18 Site 5B layout with an outline of the 'developable' area shown hatched

7.3.7 Residential Development Standards

An apartment refers to a dwelling unit that is not a house and may comprise an apartment, maisonette or duplex unit.

This application is accompanied by a **Residential Quality Audit** prepared by MDO Architects which confirms that all units within the proposed development, inclusive of duplex and triplex units, have been designed to comply with the dwelling size and amenity space standards contained in the *Design Standards for New Apartments Guidelines for Planning Authorities* (2023).

7.3.8 Unit Mix

As per Section 2.1.6 in the Planning Scheme, the range of dwellings permitted in the Clonburris SDZ includes housing, townhouses, duplex unit, apartments and

maisonettes. To facilitate market flexibility over the life of the plan, it does not prescribe specific unit mix requirements.

The proposed development in Site 5 contains a variety of housing typologies and a mix of units that will accommodate the varied needs of households.

The proposed mix of dwellings across the scheme is shown in the following Table.

Table 9 Overall Unit Mix

Dwelling Type	1-Bed	2-Bed	3-Bed
Apartments	37	21	-
Duplex	-	53	57
Triplex	-	33	-
Houses	-	-	35
Total Units	37	107	92
Total (%)	16%	45%	39%

A total of 22 units are proposed in that part of Site 5B outside the SDZ, 14 of which are 3-bedroom units (64%). This is in accordance with the SDCDP which provides for a minimum of 30% 3-bedroom housing units, although it is also noted that flexibility is afforded where the scheme is social and/or affordable housing.

7.4 Movement and Transport

7.4.1 Street Network

The principle of all designated streets in the Planning Scheme is fixed and the alignment of each street including its centre line (see Figure 2.8.5 in Section 2.8 – Building Centre Line & Urban Grain) are either fixed or flexible depending on typology. The planned street hierarchy for the SDZ lands is summarised under Table 2.2.1 and illustrated in Figure 2.2.1.

Table 2.2.1 identifies the alignment and centre line for arterial and link streets as fixed. Local streets are flexible, except in the case of streets with frontages prescribed under Section 3 (Development Areas).

The Planning Scheme Masterplan (Figure 3.1) prescribes avenue frontage along local streets in Site 5A at Lynch Lane and adjoining the designated public open space in KNE-S2, and in Site 5B adjacent to the planned vehicular entrance.

Below is an extract of the Street Hierarchy Map and extract of the Masterplan marked-up to show the locations where local streets comprise fixed elements.



Figure 19 Left: Extract from the Street Hierarchy Map (Figure 2.2.1), and Right: Extract from the Planning Scheme Masterplan (Figure 3.1) showing the location of local streets with fixed alignments due to prescribed avenue frontage.

In accordance with Table 2.2.1, the alignment of the local streets in Site 5A adjoining the central park and the southern section of the local road in Site 5B comprise 'fixed' elements due to the prescribed avenue frontage in the Masterplan. Lynch Lane, an existing local road along the eastern boundary of Site 5A is also a fixed element.

Within the proposed Site 5A layout, there is a divergence from SDZ detail proposed in relation to the alignment of the proposed local road immediately north of the central park in KNE-S2. The adjustment was made during design development when it became evident that the designated public open space in KNE-S2 shown on the Masterplan is not adequately sized to enable compliance with the numerical public open space requirement in this sub-sector (minimum 2,700sq.m).

The south side of the planned park is bound by the permitted Northern Link Street (a 'fixed' element) which also forms the southern boundary of sub-sector KNE-S2. To facilitate a larger area within the tile to be set aside for the local park, a minor adjustment to the alignment of the road immediately north of the park (including its centre line) was therefore required.

This proposed adjustment is considered reasonable having regard to relevant provisions of the Planning Scheme. This approach favours the quantitative requirements of the Plan, rather than strict adherence to the supporting maps, and is aligned with the following key principle in Section 3 of the Planning Scheme:

Ensure that each character area is developed with regard to the required prescriptive statistical parameters in particular; identify densities, social and affordable housing, community and childcare facilities, retail and services and identify the gross and net extent of each development area. (Emphasis added)

The proposed adjustment to the alignment of this local road is considered an appropriate response. It ensures consistency with the prescriptive minimum area requirements for public open space, as well as the overarching physical framework and prescribed street network.

Attention is also drawn to Section 2.13 of the Planning Scheme which makes provision for slight plot adjustments, as follows:

Slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the

*gross or net development area of any Sub Sector. The onus is on developers/applicants to demonstrate that a proposed development involving a plot adjustment **would not significantly affect the prescribed alignment or centre line of any fixed street**; would not significantly affect prescribed building lines of any fixed street; would not adversely impact on the environment or environmental objectives contained in the SEA Environmental Report (including required setback from the Grand Canal); and would not have any implications in relation to European Sites.*

In response to the above, it is reiterated that the proposed plot adjustment within sub-sector KNE-S2 is being advanced to ensure compliance with the prescribed requirement for public open space and will not alter the gross or net area of the sub-sector. It is also contended that the adjustment is a minor one that will not materially affect the consistency of the proposed development with core development parameters for the site.

The proposal for Site 5B also incorporates a minor departure from the Planning Scheme detail relating to the street network. As noted above, the Street Hierarchy Map shows a centrally located local street providing access to the lands which becomes a fixed element due to the prescribed avenue frontage along the southern portion of the road.

The alignment of this local street is now proposed further east following a request by the Council's Roads Department to relocate the signalised junction and entrance to Site 5B. Although the new location is further east than envisaged under the Movement Strategy for the SDZ, a pedestrian link will be provided at this location in place of the intended vehicular access. Importantly, the prescribed avenue frontage along Thomas Omer Way is maintained within the current layout and dwellings are positioned adjacent to the proposed pedestrian link to create clearly defined building lines on either side.

The proposed development provides for planned local links to facilitate pedestrian and cyclist connectivity, as per the street hierarchy. The image below shows their location within the development site. It is noted that the local link shown at the eastern extent of Site 5B at Thomas Omer Way will be delivered in conjunction with the permitted Northern Link Street and associated infrastructure.

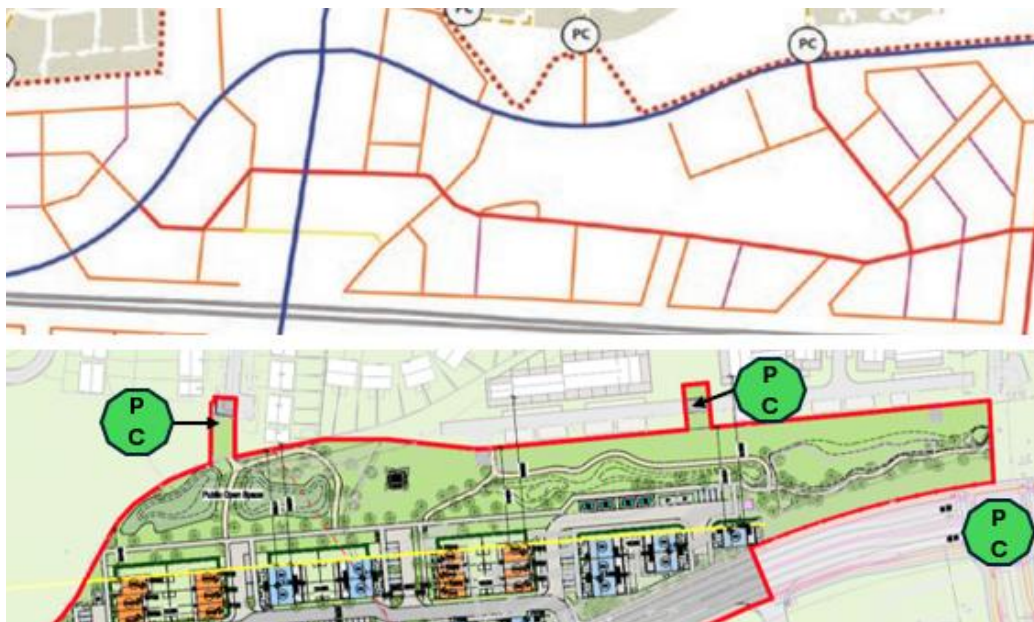


Figure 20 Planned Local Links to enhance pedestrian and cyclist connectivity

7.4.2 Movement Strategy

The locations of proposed junction upgrades and additional junctions along Arterial Streets (Proposed Signal Junctions) are identified in the Planning Scheme.

The Movement Strategy identifies a requirement for the provision of a signalised junction on Thomas Omer Way at the south of Site 5B. However, an alternate location for the signalised junction and vehicular entrance into the development is now proposed, following input from the Council's Roads Department. The location as per the Planning Scheme and the proposed location further east are shown in the Figure below.

The amendment is considered to be a minor departure from the SDZ detail, which will tie in with the emerging movement strategy for the wider lands and create a safer environment for road users and pedestrians.

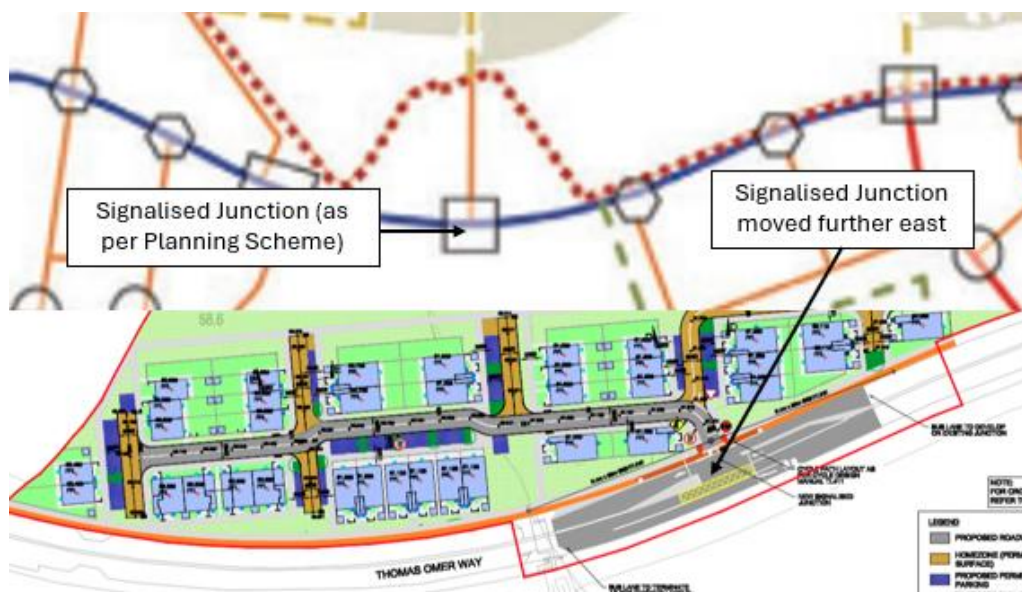


Figure 21 Signalised junction at entrance to Site 5B

7.4.3 Parking Strategy

Section 2.2.6 of the Planning Scheme highlights that the car parking strategy for the SDZ lands aims to promote sustainable travel patterns, particularly through shared or reduced use of car parking. It also indicates that parking standards in the County Development Plan apply, as follows:

The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme. The standards are maximum parking standards and should not be viewed as a target. Details in relation to the design of car parking are set out under Section 2.8 (Built Form and Design) of this Planning Scheme.

The Planning Scheme also confirms that the Zone 2 parking standards in the County Development Plan apply to the Site 5 lands, due to their identification in Figure 2.2.8 of the Planning Scheme as having 'Level 1' Accessibility.

The applicable Zone 2 parking standards in the South Dublin County Development Plan 2022-2028 are shown below.

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Figure 22 South Dublin County Development Plan parking standards

Within the proposed Site 5 development, parking has been allocated in a manner consistent with the development plan standards, remaining below the maximum rates prescribed. The Table below provides a breakdown of the car parking rates for development proposed within Site 5, indicating an overall maximum requirement of 258 spaces.

Table 5.2: Maximum Number of Car Parking Spaces Permitted

Dwelling Type	No. Proposed Units	Maximum No. Spaces	Total Maximum No. Spaces
Apartments – 1 Bed	37	0.75	27
Apartments – 2 Bed	21	1	21
2 Bed Duplex	53	1	53
3 Bed Duplex	57	1.25	71
2 Bed Triplex	33	1	33
3 Bed House	35	1.5	53
Maximum No. Car Parking Spaces Permitted			258 Spaces

Table 10 Maximum Car Parking Rates for Site 5 (Source: RPS Engineering Design Report)

With a total of 219 car parking spaces proposed within Site 5, less than the maximum requirement, the proposed development is consistent with the overarching car parking strategy that promotes sustainable travel in the SDZ.

The eastern portion of Site 5 is situated outside the Planning Scheme boundary. In the interests of a comprehensive approach, it is noted that the mandatory parking standards imposed under SPPR 3 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* apply to this portion of the development site which is outside the SDZ.

Table 3.8: Accessibility

<p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> • Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
<p>Accessible Location</p> <ul style="list-style-type: none"> • Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
<p>¹¹ 10-15 minute peak hour frequency.</p> <p>¹² Core Bus Corridor refers to the 'BusConnects Core Bus Corridor Schemes' planned for cities that will provide enhanced walking, cycling and bus infrastructure on key access corridors.</p>

Figure 23 Accessibility Criteria in the Compact Settlements Guidelines for Planning Authorities

The criteria set out in Table 3.8 of the Guidelines determine accessibility for the purpose of applying car parking standards under SPPR 3. It is noted that the site is less than 1km walking distance from Kishoge train station. However, Kishoge is on the Grand Canal Dock and Dublin Heuston - Portlaoise commuter line, and services do not meet the 10-15 minute peak hour frequency threshold, nor is the site within 500m walking distance of an existing or planned BusConnects stop, both of which are relevant to the definition of High Capacity Public Transport Nodes. It is therefore considered that this portion of Site 5 is an 'Accessible Location' (as defined in Table 3.8 of the Guidelines).

Under SPPR 3 (ii), a maximum requirement of 1.5 car parking spaces per unit is applicable to 'Accessible Locations', as follows:

SPPR 3 - Car Parking

It is a specific planning policy requirement of these Guidelines that:

...

(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

...

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

There are 22 units in total situated within the eastern portion of Site 5, allowing for the provision of up to 33 spaces within this part of the development outside the SDZ, in line with SPPR 3. The proposed development includes 29 spaces in this part of the site, below the maximum requirement.

Following in Table 11 is an overall summary of the car parking provision for Site 5, based on the applicable requirements, as per the development plan for lands within the SDZ and under SPPR 3 of the Guidelines for the eastern portion of Site 5, outside the SDZ boundary.

The breakdown refers only to dwelling typologies of relevance to Site 5.

Dwelling Type	No. Units	Parking Standard (Max.)	Max. Required	Proposed No. Spaces	Consistent
SDZ Lands subject to SDCDP standards					
1-bed unit	37	0.75 cps	27.75	190	✓
2-bed unit	99	1 cps	99		
3-bed unit	49	1.25	61.25		
3-bed + house	29	1.5 cps	43.5		
Sub Total	214	-	231.5		
Outside SDZ subject to SPPR 3 (ii)					
2-bed unit	8	1.5 cps	12	29	✓
3-bed unit	8	1.5 cps	12		
3-bed + house	6	1.5 cps	9		
Sub Total	22	-	33		
COMBINED TOTAL	236	-	264.5	219	✓

Table 11 Breakdown of Car Parking Provision in Site 5

The proposed car parking within the scheme includes a total of 18 electric vehicle (EV) spaces, being 8% of the total parking spaces.

Section 2.2.6 of the Planning Scheme sets out the following in relation to electric vehicle parking:

To facilitate the use of electrically operated cars and bicycles, all developments should provide charging points for the charging of electric vehicles at a rate of 100% of the car parking provision and 10% of the bicycle parking provision.

The South Dublin County Development Plan includes numerical standards for EV spaces in Section 12.7.5, as follows:

- EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas.*
- The remainder of the parking spaces should be constructed to be capable of accommodating future charging points.*

Within the scheme, the number of EV parking spaces is less than that required under the Planning Scheme and the development plan. However, the proposed development is appropriately future-proofed by providing for ducting throughout.

Ducting will extend to all parking spaces within the development site to support the future roll-out of EV charging points to 100% of the proposed parking spaces. It is therefore considered that the shortfall in the number of EV charging points initially is minor. The scheme is appropriately designed to facilitate EV charging for all spaces, thereby facilitating consistency with the relevant Planning Scheme standards and ensuring the scheme remains compatible with the applicable standards. The approach is therefore a minor departure from the detail set out in the Planning Scheme, rather than a material shortfall.

The proposed development includes secure bicycle storage for all units at the rate of 1 space per bedroom. This is in accordance with the development plan standards which state that a general minimum standard of 1 cycle storage space per bedroom shall be applied.

The development plan also states that visitor cycle parking shall be provided at a standard of 1 space per 2 residential units. In this instance, there is provision for 101 short-stay visitor spaces, distributed throughout the scheme, representing a minor shortfall.

7.5 Built Form and Design

7.5.1 Fixed Building Lines & Building Frontages

As per Section 2.8.3 of the Planning Scheme, development in the SDZ shall be shaped by the prescribed street network and divided into a series of blocks that present strong building frontages to surrounding streets. The prescribed street network provides for a perimeter block layout across the SDZ lands.

Figure 2.8.5 illustrates the prescribed design approach showing 'fixed' elements that relate to block frontages and their associated street alignments. For Site 5A, it shows fixed building lines along the site boundaries at Thomas Omer Way, the R136, the NLS and the centrally located public open space.

The Figure below presents the relevant extract of Figure 2.8.5 alongside the proposed Site 5A layout. It highlights that the fixed building lines, as prescribed by the Planning Scheme, have been achieved along the arterial roads and Northern Link Street.



Figure 24 Extract from Figure 2.8.5 of the Planning Scheme showing fixed building lines applicable to Site 5A (Left) and Proposed Site 5A Layout with mark-up of corresponding building lines (Right)

As noted earlier in this report, the proposed Site 5A layout deviates slightly from the Planning Scheme with respect to the alignment of the proposed local road north of the central park.

For the reasons set out in Section 7.4, the adjusted alignment of the local road is considered acceptable, facilitating consistency with the overarching physical

framework and prescribed street network. Notwithstanding, the proposed layout will ensure the required block frontage at the central park is achieved in a manner consistent with the fixed 'Avenue Frontage' requirement laid down in the Planning Scheme Masterplan (Figure 3.1), an extract of which is provided below.



Figure 25 Extract of Planning Scheme Masterplan showing prescribed block frontages, with the approximate location of Sites 5A & 5B circled in yellow

It is noted that the layout for Site 5A has also been developed to facilitate compliance with the prescribed building lines in the north-west of sub-sector KNE-S2 should the ESB infrastructure be relocated/undergrounded and the lands brought forward for development.

In the case of Site 5B, only a portion of the lands are within the SDZ. As shown in the relevant extract from Figure 2.8.5 of the Planning Scheme, building lines are fixed at the site's interface with Thomas Omer Way. The proposed Site 5B layout adheres to the prescribed building line at Thoms Omer Way.

Removal of the existing acoustic barrier is proposed to facilitate compliance and improve the overall setting, enabling direct road frontage for the new dwellings along the southern boundary. The layout also provides for the continuation of this building line further east (outside the SDZ) as far as practicable. The need to provide vehicular access to serve the development and avoid rear gardens backing onto the linear park, as well as the narrow irregular shape of the site in the east, has meant that it is not possible to orient dwellings east of the site entrance to face Thomas Omer Way.



Figure 26 Extract from Figure 2.8.5 of the Planning Scheme showing the fixed building line applicable to Site 5B (Top) and Proposed Site 5B Layout with mark-up of corresponding building line (Bottom)

7.5.2 Building Height

Regarding building heights, Section 2.8 of the Planning Scheme includes the following key principle:

To ensure that development is laid out in a series of blocks and plots that are legible, permeable and human in scale with appropriate topography responses, building heights, street widths, urban grain and street frontages;

In Section 2.8.6, related to Building Heights and Street Widths, it states:

*In order to promote place making, urban legibility and visual diversity, varied building heights are supported across the SDZ lands. Appropriate building height to street width ratios shall be incorporated across the SDZ lands in a manner that promotes and maintains a sense of enclosure along streetscapes. This shall be carried out in accordance with the requirements of DMURS (2013), the example street cross sections contained in Section 2.2 (Movement & Transport), **the general building heights outlined in Figure 2.8.10 and the detailed requirements set out under Section 3.0 (Development Areas)**. (Emphasis added)*

It is therefore considered that Section 3 contains the 'detailed requirements' that apply to the Development Areas. At Section 3.3, it states the following:

*This section comprises the core of the Planning Scheme and details development for each of the twelve development areas in Clonburris, **using statistical and physical parameters illustrated by a series of plans and drawings**. (Emphasis added)*

Section 3.3 also contains a Building Height Concept map (Figure 3.3.2) which is identical to the Building Height Strategy map (Figure 2.8.10). As per the marked-up map extract below, the height strategy for residential buildings in Kishoge North East indicates:

- 4 to 6 storeys along arterial roads - Thomas Omer Way, the Northern Link Street and the R136,
- 3 to 4 storeys along local streets, and
- 4 to 6 storeys along local streets with park frontage

To the south, in the Kishoge Urban Centre, the height strategy for residential buildings is shown as follows:

- 4 to 6 storeys along the Northern Link Street,
- 3 to 4 storeys along local street at eastern edge,
- 5 to 8 storeys along local street to the south, and
- 5 to 8 storeys along the R136.



Figure 27 Building Height Concept showing the approximate location of Site 5A and Site 5B circled yellow.

The proposed development provides for residential building heights ranging between 2 to 6 storeys, incorporating 2-storey houses, 3-storey duplexes and triplexes, and a 6-storey apartment building. The proposed height strategy for Site 5 is shown in the Figure below.



Figure 28 Proposed Site 5 Building Height Strategy

The proposed building heights of 2 storeys at Lynch Lane and 3 storeys along the site's frontage to Thomas Omer Way and the NLS are slightly below the range shown in the Planning Scheme maps. However, as noted further above, the text in Section 2.8.6 of the Planning Scheme highlights that the maps outline "*general building heights*" while "*detailed requirements*" are set out in Section 3.

The supporting text in Section 3.3, further highlights the plans and drawings provided 'illustrate' the statistical and physical development parameters applicable to the Development Areas.

Having regard to the above, it is concluded that the designated building heights of the Planning Scheme are set out in the tables in Section 3.3. The relevant development parameters related to building height for Development Area 6 (Kishoge Urban Centre) and Development Area 10 (Kishoge North East) are shown in the Figure below.

Table 3.3.6 | Kishoge Urban Centre

Building height	Sub Sector	Building Height
	KUC-S1	3-8 storey
	KUC-S2	2-8 storey
	KUC-S3	2-8 storey
	KUC-S4	2-8 storey
* See also Figure 3.3.2 Building Height Concept		

Table 3.3.10 | Kishoge North East

Building height	Sub Sector	Building Height
	KNE-S1	2-6 storey
	KNE-S2	2-6 storey
	KNE-S3	2-6 storey
	KNE-S4	2-6 storey
	KNE-S5	2-6 storey
	KNE-S6	2-6 storey
* See also Figure 3.3.2 Building Height Concept		

Figure 29 Applicable Development Parameters for Building Heights within Site 5

In the case of Site 5A, the proposed development complies with the designated building heights of 2 to 8 storeys in KUC-S2 and 2 to 6 storeys in KNE-S2. The varying heights proposed across the site which range from 2 to 6 storeys create an appropriate scale of development that responds to the hierarchy of streets, presents a strong building frontage and facilitates consistency with the applicable dwelling and density targets.

Likewise, the proposed building heights in Site 5B are consistent with the designated building heights of 2 to 6 storeys for KNE-S1. Heights of 2 to 3 storeys are proposed,

with 3-storey units situated along the frontage to Thoms Omer Way to form a distinctly 'suburban' edge and attractive streetscape environment. 2-storey houses are concentrated in the rear of the site, appropriate in the homezone areas. The proposed heights of 2 to 3 storeys are also compatible with the established residential estates on adjoining lands to the north and east.

Having regard to the foregoing, the proposed development is consistent with the applicable development parameters related to building height.

8. Conclusion

The proposed development of 236 units in Site 5 , progressed in tandem with proposals for Sites 3 and 4 will make a significant and meaningful contribution to housing delivery targets in South Dublin.

The scheme will increase social and affordable housing output, in line with Housing for All pathways that aim to:

- Support more people to own their own homes and increase affordability
- Eradicate homelessness, increase social housing delivery and support social inclusion

Development at this location is consistent with compact growth targets in national planning policy that seek to ensure new housing takes place within or contiguous to existing built-up areas in close proximity to public transport corridors.

The Clonburris SDZ is targeted for significant growth and this proposal will ensure that housing is delivered together with the necessary physical and social infrastructure to support the creation of sustainable new communities.

This Planning Report and Statement of Consistency demonstrates the consistency of the proposed development with the relevant provisions of the Clonburris SDZ Planning Scheme (2019).

The Site 5 proposal is underpinned by the aim of delivering a new residential neighbourhood that will successfully integrate with surrounding residential areas by improving permeability, creating links with adjoining lands and providing high quality public open spaces that will ensure a high level of amenity for future residents and the neighbouring communities.

The proposed development will provide a mix of high-quality residential dwellings that meet the Planning Scheme requirements and cater to the wide-ranging needs of households and families.

The proposed development is considered to be compliant with the Clonburris SDZ Planning Scheme (2019) and in accordance with the proper planning and sustainable development of the area.

15 APPROPRIATE ASSESSMENT

This application is accompanied by an Appropriate Assessment Screening Report, prepared by Minogue & Associates Ecological Consultants which concludes: -

Following an examination, analysis, and evaluation of all relevant information in this AA Screening Report and in view of best scientific knowledge, and applying the precautionary principle, it can be concluded that there is no likelihood of significant effects on any European site, arising from the proposed development, either alone or in combination with other plans and projects.

In light of the findings of this report it is the considered view of the authors of this Screening Report for Appropriate Assessment that it can be concluded by the South Dublin County Council that the project is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.

16 ENVIRONMENTAL IMPACT ASSESSMENT

The revised 2014 EIA Directive (Directive 2014/52/EU, as amended by Directive 2011/92/EU) uses the term environmental impact assessment report (EIAR) rather than the previous environmental impact statement (EIS). Where current national guidelines and regulations refer to an Environmental Impact Statement or EIS, this can be taken to mean an Environmental Impact Assessment Report (EIAR).

Section 172 of Part X of the Planning and Development Act, 2000, as amended by Regulation 17 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) sets out the requirement for an EIA as follows: -

“172 (1) An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either—

(a) the proposed development would be of a class specified in—

(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either—

(I) such development would equal or exceed, as the case may be any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or

(ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either—

(I) such development would equal or exceed, as the case may be any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned, or

(b)

(i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not equal or exceed, as the case may be, the relevant quantity, area or other limit specified in that Part, and

(ii) the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.”

The Fifth Schedule of the Planning and Development Regulations lists classes of development where an EIA is mandatory under Part 1 and where an EIA may be required under Part 2. Where a project falls within a criterion for a type of development and / or exceeds a threshold as listed in Part 1 or Part 2, then it must be subjected to EIA.

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 – 2018 set mandatory thresholds for each project class. Section 10(b)(iii) and (iv) addresses ‘Infrastructure Projects’ and requires that the following class of project be subject to EIA: Section 10(b)(i) **Construction of more than 500 dwelling units**. Category 10(b)(iv) refers to ‘Urban development which would involve an area greater than 2 hectares in the case of business district, **10 hectares in the case of other parts of a built-up area** and 20 hectares elsewhere.’

The proposed development comprises a total of 1,252no. residential units at a site area of over 10Ha. As such, an EIAR is submitted to An Bord Pleanála with this Planning Application as part of the EIA process.

16.1 Extent of the EIAR

Given the nature and scale of the proposed development an EIAR was prepared to accompany the planning application for this Planning Application to An Bord Pleanála. The EIAR was co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants with specialist input from the following: -

- AWN Consulting, responsible for the following EIAR Chapters: -
 - Population & Human Health.

- Climate (Climate Change).
 - Climate (Air Quality).
 - Air (Noise & Vibration).
 - Material Assets (Waste).
- JBA Environment Consultants, responsible for the following EIAR Chapter: -
 - Biodiversity.
- Doyle O'Troithigh Landscape Architects, responsible for the following EIAR Chapter: -
 - Landscape and Visual Impact
- IAC Consulting responsible for the following EIAR Chapter: -
 - Cultural Heritage (Archaeological & Architectural).
- DBFL Consulting Engineers, responsible for the following EIAR Chapters: -
 - Land, Soil & Geology.
 - Water.
 - Material Assets (Transportation).
- O'Connor Sutton Cronin Consulting Engineers, responsible for the following EIAR Chapter: -
 - Material Assets (Utilities).
- Stephen Little & Associates Chartered Town Planners & Development Consultants, responsible for the following EIAR Chapters: -
 - Introduction
 - Non-Technical Summary
 - Description of Proposed Development.
 - Description of Reasonable Alternatives
 - Risk Management
 - Summary of Mitigation Measures
 - Summary of Residual Impacts
 - Summary of Cumulative Impacts and Interactions

