Planning Report & Statement of Consistency

For a Large-Scale Residential Development

Lands at

Blackglen Road,
Sandyford,
Dublin 18.

On behalf of

Zolbury Ltd.

January 2025

Brock McClure
PLANNING & DEVELOPMENT CONSULTANTS

Planning & Development Consultants
63 York Road,
Dun Laoghaire
Co. Dublin
www.brockmcclure.ie

Table of Contents

1 EXECUTIVE SUMMARY 4
2 INTRODUCTION 7
2.1 Applicant and Design Team 7
2.2 Context for the lodgement of this Submission 9
2.2.1 Digital Copies 9
2.2.2 Website 9
2.2.3 Compliance with Planning Regulations 9
3 PRE-PLANNING MEETINGS WITH DÚN LAOGHAIRE RATHDOWN COUNTY COUNCIL 10
3.1 Summary of Pre-Planning Proposals at S247 and S32B LRD Meeting 10
3.2 Stage 1 – S247 Pre-Planning Proposal 12
3.3 Stage 2 – S32B LRD Meeting – LRD0020 12
3.4 Pre-Planning Conclusion 12
4 SITE CONTEXT 15
4.1 Subject Site 15
4.2 Surrounding Context 15
4.3 Public Transportation Infrastructure 17
4.3.1 Bus Service 17
4.3.2 Luas Service 18
4.3.3 Cycling and Walking 20
4.3.4 Blackglen Road Improvement Scheme 20
5 PLANNING HISTORY 21
5.1 Subject Site 21
5.2 Surrounding Area 22
5.3 Planning Comment on Planning History 22
5.4 Statutory Notices 23
6 ADDRESSING REASONS FOR REFUSAL (SHD Ref. 314459-22) 24
7 PROPOSED DEVELOPMENT 32
7.1 Refused Scheme and Current Proposal 32
7.2 Key Changes on the Former SHD 32
7.3 Summary of Proposed LRD Development 34
7.4 Detailed Description 36
8 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT 41
8.1 Strategic Planning Policy Documents 41
8.1.1 Housing For All – All New Housing Plan for Ireland 41
8.1.2 National Planning Framework – Project Ireland 2040 42
8.1.3 Rebuilding Ireland: Action Plan for Housing and Homelessness 45
8.1.4 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031 45
8.1.5 Smarter Travel - A New Transport Policy for Ireland 2009-2020 47
8.1.6 Transport Strategy for the Greater Dublin Area 2022-2042 47
9 STATEMENT OF CONSISTENCY - SECTION 28 MINISTERIAL GUIDELINES 49
9.1 Sustainable Residential Development & Compact Settlement Guidelines for Planning Authorities (2024) 49
9.1.1 Areas and Density Range 49
9.1.2 Separation Distances (SPPR 1) 50
9.1.3 Private Open Space for Houses (SPPR 2) 50
9.1.4 Public Open Space 51
9.1.5 Car Parking – Quantum, Form and Location (SPPR 3) 51
9.1.6 Bicycle Parking and Storage (SPPR 4) 52
9.1.7 Daylight 52
9.2 Guidelines for Planning Authorities on Childcare Facilities (2001) 53
9.3 The Planning System and Flood Risk Management (2009) 55
9.4 Guidance on Appropriate Assessment for Planning Authorities (2009) 55
9.5 Sustainable Urban Housing: Design Standards for New Apartments (July 2023) 55
9.6 Urban Development and Building Height Guidelines (2018) 60
10 STATUTORY PLANNING CONTEXT 65
10.1 Dún Laoghaire-Rathdown County Development Plan 2022-2028 65
10.1.1 Core Strategy 65
10.1.2 Housing 65

10.1.3 Zoning 67
10.1.4 Planning Policy 68
10.1.5 Landscape Character Assessment & Visual Impact 70
10.1.6 Ecological Network 71
10.1.7 Height 75
10.1.8 Density 75
10.1.9 Design and Layout 76
10.1.10 Unit Mix 76
10.1.11 Dual Aspect 77
10.1.12 Landscape and Open Space 78
11 CONCLUSION 82

1 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have prepared this Planning Report on behalf of our client, **Zolbury Ltd., Unit 9, Ardcavan Business Park, Ardcavan, Wexford, Ireland Y35 XT53** for a Large-Scale Residential Development proposal on lands located at **Blackglen Road, Sandyford, Dublin 18**. For clarity, the site is located within the administrative boundary of Dún Laoghaire-Rathdown County Council.

This report is intended to identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Dun Laoghaire Rathdown County Development Plan 2022.

A summary of the main points of this report are set out below (emphasis added in bold):

Subject Site:

- The subject site is located at a transitional location within the urban fringe of Dublin, at the foothills of the Dublin Mountains and c. 1.4km southwest of the M50 interchange at Kilgobbin Road. It is a large, underutilised site extending to c. 3.83ha (gross).
- The area is generally characterised by single and two storey houses.
- There is an existing neighbourhood centre on the eastern side of the subject site located at the Lambs Cross junction within Sandyford Village, which is well served by existing community infrastructure and amenity space.
- The site is also strategically located in close proximity to the established area of Sandyford Industrial Estate and the amenities and services offered there. These include: medical centre, pharmacies, shops, cafés/restaurants, bars, gyms, schools, childcare facilities and banks for example. Sandyford itself is also a large employment hub in Dun Laoghaire Rathdown.
- The site is served by numerous modes of public transport . The northern boundary of the site is located approximately 120m (2-minute walk, 1-minute cycle) from the nearest bus stop along Blackglen Road. The Blackglen Road Improvement Scheme has also recently been completed, and it is expected that the scheme will facilitate a Quality Bus Corridor, which may support additional bus services available to future residents, in line with BusConnects. The site is also located c. 1.9km (27-minute walking distance) from Glencairn Luas stop.

The Proposal:

- A total of 192 no. residential apartment units are proposed, which are broken down as 33 no. 1-beds, 84 no. 2 -beds, 61 no. 3-beds and 14 no. 4-bed units with associated residential amenity services in 4 no. apartment blocks (A1 – B4), 40 no. duplexes (C1, C2, C2A) and 14 no. house units (D1 & D2) interlinked blocks ranging in height from 2-5 storeys over podium level/basement level areas.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities. **Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.**
- A childcare facility is proposed at ground floor level of Block A1 and is afforded with a dedicated outdoor children's play area.
- Variation in building height along with a mix of residential units, ground floor level resident amenities, a childcare facility and a bike workshop, all combine to provide **a rich living environment close to a host of facilities at Sandyford and landscape amenities at the foothills of the Dublin Mountains within this transitional location.**



Figure 1 – CGI View from Blackglen Road

- The provision of resident amenity, creche and bike workshop floor space, in conjunction with the layout of the ground floor level (refer to Block A1 & A2) and the aesthetic of the wider scheme, serves to provide an appropriate interface between the subject development along Blackglen Road and the immediate adjoining public realm.
- The scheme responds to its context through sensitively positioning the buildings into the natural contours by providing deep setbacks for the apartments, which respond to the sites sloping landscape. The undulating topography of the site also allows for gradual increases in height to transition to increased development height between 2 to 4 storeys with a stepped approach providing a maximum of 5 storeys to create a variety and visual interest and to comply with the cumulative height's strategy.
- The proposed development with its active frontage at the entrance plaza and the proposed public open spaces creates a welcoming pedestrian environment, active public realm and further develops the sites relationship with the existing shops and services to the east at Sandyford Village.
- Public realm upgrades proposed as part of this development will transform the currently underutilized land within and surrounding the development site to create a quality environment. **The vision for the project scheme is to create a unique sense of place with a strong community identity characterised by the entrance plaza and the central public open space, which will act as prominent focal point set within the area.**



Figure 2 – CGI View adjacent to duplex units illustrating public open space

- 3 no. resident amenity spaces are also proposed at ground floor level of Blocks A1 and A2 to include a co-working hub/café area with 2 no. meeting rooms, a resident's lounge and a postal/parcel store room, which is to be managed (located in Block A2), in addition to a bike workshop and childcare facility (located in Block A1).
- A variety of open spaces are proposed. These include public open spaces in the form of a central public open space area accommodating outdoor seating, planting, pedestrian, and cycle links, which is in addition to a green buffer zone and tree trail, play provision and natural areas for play, a fitness area and a dog park. Communal open space is located in the form of podiums and courtyards and includes play provision, a fitness area and accessible roof gardens.
- Appropriate levels of car parking will be provided to cater for the residential development. **A ratio of 1.36 spaces per unit is considered appropriate given the site's proximity to public transport and local amenities/services and the proposal's full compliance with bicycle parking requirements. This provision is based on 226 car parking spaces for 192 residential units.** It is submitted that the quantum of parking proposed will strike a balance with encouraging public transport and bicycle use, supporting such policies of Dún Laoghaire Rathdown County Council.
- The scheme proposed strives to maximise the use of the site whilst providing an appropriate scale, massing and unit mix on site.

Planning Context:

- The subject site is located proximate to an area of zoned open space (Zoning Objective F) to the Northeast. It may be considered that the site is therefore situated in a Transitional Zone. The proposal therefore fulfils the objective of the '**A' zoning *"to provide residential development and improve residential amenity while protecting the existing residential amenities",*** particularly considering the current proposal for residential development along the shared boundary is an appropriate land use with no perceived negative impact on the area of open space to the northeast.
- **The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with the national policy mandate.**
- The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.

2 INTRODUCTION

We, Brock McClure Planning and Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have prepared this Planning Report and Statement of Consistency on behalf of our client, **Zolbury Ltd., Unit 9, Ardcavan Business Park, Ardcavan, Wexford, Ireland Y35 XT53** for a Large-Scale Residential Development proposal on lands located at **Blackglen Road, Sandyford, Dublin 18** on a site extending c.3.83ha.

This report is intended to specify the rationale behind the subject proposal; to identify consistency and compliance with the relevant national planning policy guidelines under Section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Dún Laoghaire-Rathdown County Development Plan 2022-2028; and to provide a detailed description of the proposal for the benefit of Dun Laoghaire Rathdown County Council.

The overall proposal related to a Large-scale Residential Development (LRD) of 192 no. residential units with associated residential amenity spaces, a childcare facility and associated public and communal open spaces.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority to deliver on a proposal that is appropriate to the site and the surrounding context along Blackglen Road. The Planning Authority is aware of the Applicant's commitment to delivering a high-quality residential development as evidenced in the pre-planning meeting.

The proposal reflects the feedback received:

- Section 247 pre-planning consultation carried out between the project design team and Dún Laoghaire Rathdown County Council's Planning Department on the 13th of March 2024.
- Section 32B Meeting held with the Planning authority on the 25th of July 2024 and subsequent Section 32b Opinion prepared by the Planning Authority, issued electronically on the 23rd of August 2024.

The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal.

The residential units proposed are of exceptional quality, with high amenity layouts, community facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties in the design of this scheme. The development also supports residential amenity services, which are wholly appropriate for this scheme. Public realm upgrades proposed as part of this development will transform currently underutilised land within and surrounding the development site to create a quality residential scheme.

We ask the Planning Authority to consider these points in their review of proposals and we trust that they will view this proposal as a positive move towards the delivery of much needed residential development at an opportunely located site.

The Planning Authority is now invited to review the contents of this submission and accompanying documentation to consider the proposal on its merits and in line with the relevant statutory policy context.

We confirm that this application for a Large-Scale Residential Development is made in the form of 1 digital copy, as required.

2.1 Applicant and Design Team

Our client, Zolbury Ltd., has appointed an experienced design team to prepare a large-scale residential planning application comprising the following consultants:

- Brock McClure - Planning and Development Consultants
- O'Mahony Pike – Architects
- O' Connor Sutton Cronin Consulting - Consulting Engineers
- Gannon and Associates – Landscape Architect
- Enviroguide Consulting – Environmental and Ecology Consultants
- Enfonic – Acoustics Consultants
- Modelworks – Architectural and Engineering Model Makers / Visual Impact
- Aramark – Property Management
- RG – Historical Building Consultants
- ISM – Independent Site Management
- IAC – Archaeological Consultants

The various inputs from the design team are referenced where relevant within this report. We confirm that the following reports are included herewith to enable a comprehensive assessment of the scheme:

Deliverable:	**Responsibility:**
Letter of Consent – DLRCC Letter of Consent – Applicant Fee - €30,468.00 (paid to bank – see receipt in enclosed pack)	**Applicant**
Cover Letter Development Description Planning Application From LRD Form 19 Part V Acknowledgement Letter Site Notice – Erected 24th January 2024 Newspaper Notice – published 24th January 2024 Stage 3 Report & Statement of Consistency Community Infrastructure Audit LRD Opinion Report (incl DLRCC LRD Opinion)	**Brock McClure Consultants**
Architectural Drawings & Register Architectural Design Statement (Including Part V Pack) Housing Quality Assessment Schedule of Accommodation + Areas Opinion Report	**O'Mahony Pike Architects**
Landscape Drawings & Register Landscape Details/Design Rationale Opinion Report	**Gannon and Associates**
Engineering Drawings Engineering Services Report Site Specific Flood Risk Assessment Traffic and Transportation Assessment Mobility Management Plan DMURS Statement Construction and Environmental Management Plan Resource and Waste Management Plan Lighting Layout and Report Energy & Sustainability Report/Climate Action Report Daylight, Sunlight & Overshadowing Assessment Confirmation Feasibility - Irish Water RSA Stormwater Audit Pedestrian Wind Comfort Study Opinion Report's (Drainage & Transport)	**O' Connor Sutton Cronin Consulting Engineers**
AA Screening EIA Screening Report Ecological Impact Assessment Arboricultural Drawings, Schedule and Report Operational Waste Management Plan Climate Change Impact Assessment Wildlife corridor & biodiversity refuge management plan Invasive alien species management plan Hydro-Geology Report Overall response to Biodiversity Officer's report Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended Opinion response	**Enviroguide**
Noise Impact Assessment	**Enfonic**
Landscape & Visual Impact Assessment (including CGI's / Photomontages)	**Modelworks**
Building Lifecycle Report Property Management Strategy	**Aramark**
Architectural Heritage Impact Assessment	**RG**
Archaeological Assessment	**IAC**
Telecommunications Impact Assessment	**ISM**

2.2 Context for the lodgement of this Submission

Following the receipt of the LRD Opinion from the Dún Laoghaire-Rathdown County Council under PAC/LRD2/005/24, it was concluded that :

> *"pursuant to Section 32D of the Planning and Development Act, 2000 (as amended), stating that it is of the opinion that – the documentation submitted with the consultation request under section 32B of the Act* ***does not constitute a reasonable basis*** *on which to make an application for permission for the proposed LRD."*

Please refer to the response to Response to Opinion report submitted with this application which fully addresses all concerns and noted by the Planning Authority in their opinion. We believe that all recommendations and suggestions have now been addressed through further design revisions to the satisfaction of Dun Laoghaire Rathdown County Council.

2.2.1 Digital Copies

We specifically confirm that:

- 1 digital copy of all material has been issued to the Planning Authority of Dún Laoghaire-Rathdown County Council through the E-Planning Portal.

2.2.2 Website

We confirm that a digital copy of all material is also available to view at the following website:

www.bgrlrd.ie

2.2.3 Compliance with Planning Regulations

We confirm that prior to lodging this planning application, all relevant drawings were screened by this office with reference to the Planning & Development Regulations, 2001(as amended) and are consistent with the spirit and intent of same.

In accordance with article 22(2) (a) of S. I. No. 685 of 2006, a copy of the newspaper notices and the site notice accompanies this planning application.

In accordance with article 22(2)(b) and (d) of S. I. No. 685 of 2006 this planning application is accompanied by a site location map of sufficient size, prepared by OMP and clearly identifies, at an appropriate scale the lands which are the subject of this application outlined in red.

In accordance with article 22(2)(b) of S. I. No. 685 of 2006 the approximate location of the 2 no. Site Notices erected is identified on the Site Location Map.

In accordance with article 19(1)(b) of S. I. No. 685 of 2006 the Site Notice has been printed on indelible ink on a white background.

In accordance with article 22(2)(h) of S. I. No. 685 of 2006 the appropriate fee payable to the Planning Authority with respect to this planning application is calculated and has been paid directly to Dún Laoghaire Rathdown County Council.

In accordance with article 23(1)(a) of S. I. No. 685 of 2006 the lands which are the subject of this application are outlined in red on the enclosed Site Layout Plan at 1:500 scale prepared by OMP.

In accordance with article 23(1)(f) of S. I. No. 685 of 2006 plans and drawings of elevations and sections indicate in figures the principal dimensions (including overall height) of any proposed structure.

In accordance with article 23(1)(g) of S. I. No. 685 of 2006 all OS mapping is appropriately identified.

In accordance with article 23(1)(h) of S. I. No. 685 of 2006 the north point is indicated on all relevant maps and plans.

3 PRE-PLANNING MEETINGS WITH DÚN LAOGHAIRE RATHDOWN COUNTY COUNCIL

The evolution of the scheme has been brought about following engagement between the applicant's design team and the Planning Authority. The applicant and design team formally engaged in preliminary discussions with the Planning Authority on the 13th of March, presenting a draft outline of the proposed development under Reference PAC/LRD1/003/24.

Comments from the Section 247 pre-planning meeting with Dún Laoghaire-Rathdown County Council representatives present at the meeting were considered and the design team prepared an updated proposal based on the feedback received, which was lodged under Section 32B of the Planning and Development Act 2000 (as amended) (reference PAC/LRD2/005/24).

A subsequent LRD Meeting was held with the Planning Authority on the 25th of July 2024. The Planning Authority then issued an Opinion on the 23rd of August 2024. As noted the LRD opinion report is dated 23rd August 2024, and accordingly the final date to submit a LRD planning application is 23rd February 2025 (6 months). We can confirm that this LRD application has been lodged within this timeframe.

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted. Where the Applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

The comments received from DLRCC at the LRD meeting and the applicants' responses to same are outlined in the accompanying Statement of Response to the LRD Opinion Report lodged as part of this planning application pack. We refer the Planning Authority to this document for more information.

3.1 Summary of Pre-Planning Proposals at S247 and S32B LRD Meeting

The proposal submitted at these stages are summarised below in Table 1 which sets out the key development statistics presented at Stage 1 – S247 and Stage 2 - S32B to the Planning Authority for this Large-Scale Residential Development.

Development Parameter	Proposal at S247 Stage 1	Proposal at S32B Stage 2	DLRCC REQUIREMENT
Application Site	3.7ha	3.7ha	**N/A**
Development Type	LRD including Childcare Facility	LRD including Childcare Facility	**N/A**
No. of residential units	192 no. units • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 86 no (44.7 %) • 3 Bed units: 61 no (31.7 %) • 4 Bed units: 12 no (6.2%)	192 no. units Apartment mix – • 1 Bed units: 33 no (17 %) • 2 Bed units: 78 no (41 %) • 3 Bed units: 27 no (14 %) Duplex apartment mix – • 1 Bed units: 6 no (3 %) • 2 Bed units: 20 no (10 %) • 3 Bed units: 14 no (7%) Houses – • 3 Bed units: 14 no (7 %)	**Table 1: Apartment Mix Requirements** 1 Bed units: 30% max 3 Bed units: 20% min
Density	Gross density 51.9 dph Net density 61dph	51.05 units per ha (net density)	**Sustainable Urban Housing: Design Standards for New Apartments (December 2022)** Peripheral and/or less accessible urban locations: >45 dwellings per hectare net **Sustainable Residential Development and Compact Settlement Guidelines** City Suburban/Urban Extension: 40 dph to 80 dph (net)

Plot Ratio	1.98	1.46	N/A
Site Coverage	22.3% (exc. podium)	22.2%	N/A
Communal Open Space	Total 2,639 sqm	Total 2,959 sqm (7.86 sqm)	One Bed – 5 sqm (min) Two bedrooms (3 bed) – 6 sqm (min) Two bedrooms (4 bed) – 7 sqm (min) Tree bedrooms – 9 sqm (min) Four + bedrooms – 12 sqm (min)
Public Open Space	Total 8, 908 sqm (24%)	Total 8, 370 sqm (22.25% of site area)	Residential Development in the existing built-up area: 15% (of site area)
Wildlife Corridor	4,594 sqm	4,618.51 sqm (12.28%)	**N/A**
Resident Amenity Space	418 sqm (rate 2.17m2/unit)	Resident Amenities Area (Block A1+2) = 386.9sqm (Rate 2.02 m2/unit)	**N/A**
Height	2-4 Storeys	2-4 Storeys The only exception is the 5 storey upper level setback to block B1 only.	Maximum of **3-4 storeys** may be permitted in appropriate locations.
Dual Aspect Units	138 units (72%)	158 units (82%)	Minimum of **50%** dual aspect apartments in a single scheme
Car Parking	247 spaces (ratio 1.28)	Total - 261 spaces (ratio 1.36) <u>Apartment Blocks</u> Basement car park blocks B1 & B2 = 61 Podium car park blocks B1 & B2 = 13 Podium car park blocks B3 & B4 =21 = total 95 no. car parking spaces <u>Duplex Units + Houses</u> Surface level – lower hillside = 61 Surface level– lower hillside = 77 Houses = 28 = total 166 Including 13 no. accessible spaces (5% of 261)	**Parking zone 3:** <u>Apartments/Duplex</u> 1 per 1 Bed units: 33 no parking spaces 1 per 2 Bed units: 84 x 1 = 84 no parking spaces 2 per 3 Bed units: 47 x 2 = 94 no parking spaces Per 4 bed units: 14 x 2 = 28 **(plus 1 in 10 visitor parking– (178/10 = 17.8 visitor spaces))** <u>Houses</u> 2 per 3 Bed units: 14 no x 2 = 28 no parking spaces <u>Creche</u> 1 parking space per 40m2: (381.9 sqm/40 = 9.54) **Total = 276.54 car parking spaces**
Motorbike parking spaces	N/A	Total - 9 no. spaces - Breakdown: Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4	Minimum of 4 or more spaces per 100 car parking spaces
Cycle Parking	298 (ratio 1:5)	399 resident bike spaces (ratio 1:5) 66 visitor bike spaces	Long Stay: 1 space per unit (192 / 1 space per unit = 192) Short Stay: 1 space per 5 units (192 / 5 = 38.4). Total = 230.40
Childcare Space	401 sqm (childcare facility) 170 sqm (outdoor play area)	381.9 sqm (childcare facility) 170.3 sqm (outdoor play area)	Refers to Section 4.7 of the Design Standards for New Apartment

		(42.4 childcare places)	Guidelines for Planning Authorities (2020) 1 no. childcare facility (min of 20 child spaces) for every 75 dwelling units Exception for 1 bedroom or studio type units 159 no units (excluding 1 bed units) / 75 units = 2.12 x 20 = 42.4 spaces
Part V	19 units (block A1 - 15 & block A2 - 4)	19 units (block A1 - 15 & block A2 - 4)	10 % for social and affordable homes

Table 1 – Evolution of the Proposal from Pre-Planning (Comparative Table)

3.2 Stage 1 – S247 Pre-Planning Proposal

In February 2024, the applicant sought to engage with the Planning Authority for a Large-Scale Residential Development (LRD) proposal, which in summary comprised of 192 no. residential units with a density of 51.9 units per ha. For further details on key parameters, please refer to Table 1 above. As previously noted, the Stage 1 - S247 Pre-Planning consultation with Dún Laoghaire-Rathdown County Council took place on the 13th of March 2024.

An applicant response to feedback received is now outlined Appendix 2 of this report.

3.3 Stage 2 – S32B LRD Meeting – LRD0020

A subsequent LRD Meeting was held with the Planning authority on the 25th of July 2024.

The proposal submitted provided for a Large-Scale Residential Development, which in summary consisted of 192 no. units with a density of 51.05 units per ha. For more details we refer to Table 2 of this report.

3.4 Pre-Planning Conclusion

As evidenced above, all feedback from Dún Laoghaire-Rathdown County Council has been closely considered in the design of the proposal. We trust that the final proposal submitted addresses the concerns raised by the Planning Authority at the Section 247 Meeting and subsequent LRD Meeting and Opinion.

In this regard it is submitted that the residential development as proposed has evolved to be a high-quality development completely adherent to local and national standards and guidelines and fully in accordance with the proper planning and sustainable development of the area. An outline of the final proposed development is now provided for Dún Laoghaire-Rathdown County Council below.

Development Parameter	**Proposal at S247 Stage 1**	**Proposal at S32B Stage 2**	**Final Planning Application at Stage 3**
Application Site	3.7ha	3.7ha	**Gross - 38,363 m2 (3.83 ha)** **Net - 32,422 m2 (3.24 ha)**
LRD including Childcare Facility	LRD including Childcare Facility	LRD including Childcare Facility	**LRD including Childcare Facility**
No. of residential units	192 no. units • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 86 no (44.7 %) • 3 Bed units: 61 no (31.7 %) • 4 Bed units: 12 no (6.2%)	192 no. units <u>Apartment mix –</u> • 1 Bed units: 33 no (17 %) • 2 Bed units: 78 no (41 %) • 3 Bed units: 27 no (14 %) <u>Duplex apartment mix –</u> • 1 Bed units: 6 no (3 %) • 2 Bed units: 20 no (10 %) • 3 Bed units: 14 no (7%)	**192 no. units** <u>Apartment mix –</u> Block A1-2: • 1 Bed units: 5 no (2.6 %) • 2 Bed units: 26 no (13.5 %) • 3 Bed units: 10 no (5.2 %) Block B-4: • 1 Bed units: 28 no (14.6 %) • 2 Bed units: 52 no (27.1 %)

		Houses – • 3 Bed units: 14 no (7 %)	• 3 Bed units: 17 no (8.5 %) Duplex apartment mix – • 2 Bed units: 6 no (3.1 %) • 3 Bed units: 20 no (10.4%) • 4 Bed units: 14 no (7.3%) Houses – • 3 Bed units: 14 no (7.3 %) **Overall unit mix** • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 84 no (43.8 %) • 3 Bed units: 61 no (31.8 %) • 4 Bed units: 14 no (7.3%)
Density	Gross density 51.9 dph Net density 61dph	51.05 units per ha (net density)	**59.22 units per ha (net density)**
Plot Ratio	1.98	1.46	**0.67**
Site Coverage	22.3% (exc. podium)	22.2%	**22.2% (8,526 m2)**
Communal Open Space	Total 2,639 sqm	Total 2,959 sqm (7.86 sqm)	**2,168 m2 (5.4% of site area)**
Public Open Space	Total 8, 908 sqm (24%)	Total 8, 370 sqm (22.25% of site area)	**8,687 m2 (22.3% of site area)**
Wildlife Corridor	4,594 sqm	4,618.51 sqm (12.28%)	**4,666 sqm (11.9% of site area)**
Resident Amenity Space	418 sqm (rate 2.17m2/unit)	Resident Amenities Area (Block A1+2) = 386.9sqm (Rate 2.02 m2/unit)	**Resident Amenities Area** Block A1 & A2 = 386.9 sqm (Rate 2.01 m2/unit)
Height	2-4 Storeys	2-5 Storeys	**2-4 Storeys** **The only exception is the 5 storey upper level setback to block B1 only.**
Dual Aspect Units	138 units (72%)	158 units (82%)	**155 units (80.7%)** • Blocks A1– 12 units (80%) • Block A2 – 22 units (84.6%) • Block B1&B2 – 34 units (66.7%) • Block B3&B4 – 33 units (71.7%) • Block C - 40 units (100%) • Block D – 14 units (100%)
Car Parking	247 spaces (ratio 1.28)	Total - 261 spaces (ratio 1.36) Apartment Blocks Basement car park blocks B1 & B2 = 61 Podium car park blocks B1 & B2 = 13 Podium car park blocks B3 & B4 =21 = total 95 no. car parking spaces Duplex Units + Houses Surface level – lower hillside = 61 Surface level– lower hillside = 77 Houses = 28 = total 166	**Total - 226 spaces (ratio 1.18)** **Apartment Blocks** Basement car park blocks B1 & B2 = 61 Podium car park blocks B1 & B2 = 13 Podium car park blocks B3 & B4 =21 = total 95 no. car parking spaces Duplex Units + Houses Surface level – lower hillside = 43 Surface level– upper hillside = 60 Houses = 28 = total 131

		Including 13 no. accessible spaces (5% of 261)	Including 12 no. accessible spaces (5% of 226)
Motorbike parking spaces	N/A	Total - 9 no. spaces - Breakdown: Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4	**Total - 9 no. spaces - Breakdown:** Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4
Cycle Parking	298 (ratio 1:5)	399 resident bike spaces (ratio 1:5) 66 visitor bike spaces	**Total – 484 no. bike space (ratio 2.52)** 446 no. long stay 38 no. short stay
Childcare Space	401 sqm (childcare facility) 170 sqm (outdoor play area)	381.9 sqm (childcare facility) 170.3 sqm (outdoor play area) (42.4 childcare places)	**Block A1** 378.2 sqm (childcare facility) 170 sqm (outdoor play area) (42.4 childcare places required – the proposed facility can accommodate up to 62 children)
Part V	19 units (block A1 - 15 & block A2 - 4)	19 units (block A1 - 15 & block A2 - 4)	**19 units (block A1 - 15 & block A2 - 4)** Unit Mix • 1 Bed units: 3 no (16 %) • 2 Bed units: 6 no (32 %) • 3 Bed units: 10 no (52 %)

Table 2 - Comparative Table demonstrating Stage 1 and 2 with current proposal

4 SITE CONTEXT

4.1 Subject Site

The site subject of this LRD Planning Application extends to approximately 3.83ha (gross) and is located at a transitional location within the urban fringe of Dublin, at the foothills of the Dublin Mountains and c. 1.4km southwest of the M50 interchange at Kilgobbin Road. The site has two road frontages, to the north along Blackglen Road and to the southwest along Woodside Road. To the east of the Blackglen Road frontage is a 'run' of 5 semi-detached and detached cottages, gardens of large detached houses of one and 2-storey height which appear to generally date from recent decades.



Figure 3 – Aerial Map with subject site outlined in Red

The site, of irregular shape, comprises greenfield lands with scrub, gorse, and some exposed rock. The topography of the site varies significantly and ranges from approximately 159 mAOD in the southwest boundary of the site to 138.7 mAOD (meters above ordnance datum) in the northeast boundary of the site. The site generally falls from west to east with a slight camber resulting in the northern half of the site falling towards the northeast while the southern half of the site falls to the southeast corner which borders the Carrickmines stream.

4.2 Surrounding Context

In terms of residential development, the immediate area surrounding the Blackglen Road site is predominately characterised by low rise detached housing, with some semi-detached and terraced houses to the East along Blackglen Road towards Lamb's Cross. The areas surrounding the site to the south and west is primarily rural in nature, with some commercial to the North and Village to the East.

Lamb Doyle's pub is c. 230 m to the west of the site and the junction between the Enniskerry Road (R117), Sandyford Road (R117), Blackglen Road (R113) and Hillcrest Road (R113), also known as Lamb's cross, is c. 500 m to the east, which creates a need for a design that mediates between these distinct rural and urban conditions.

The site is located in an area in which the immediate environs is populated by one-off 1-3 storey housing. On the northern side of Blackglen Road, adjacent the subject site and beyond established housing, lies an

expansive woodland and open green space known as Fitzsimons's wood which itself lies beside the National Sport & Science Centre.

In overall terms, existing building heights in the area range from 1 – 4 storeys at present. However, there is also a wide variety of building heights due to the transitional zone of the site between varying urban and rural scales, ranging in height of 4-7 storeys in the more built-up areas of Belarmine, Simons Ridge and the emerging developments along Sandyford Road.

With regards to future development surrounding the subject site, it is noted that the proposed development at Blackglen Road is part of the growing intensification of land zoned '*Objective A*' that sits to the North of the mountain foothill landscape amenity zone (refer to Figure 4 below).

1. **Lamb Doyles** - 14 residential units - 3 storeys (D06A/0712)
2. **Four Winds** - 31 residential units - 4 storeys (D22A/0365)
3. **Balally** - 101 residential units - 3-4 storeys (ABP31332122)
4. **Whinsfield** - 67 residential units – 4-5 storeys (D17/1003)
5. **Crohamhurst** - 80 residential units - 3-6 Storeys (D23A/0456)
6. **The Pastures** - 31 residential units - 3-5 storeys (D21A/0595)
7. **Karuna** - 73 residential units - 3-6 storeys (D24A/0424/WEB)
8. **Cul Cuille** - 10 residential units - 3 storeys (D14A/0532)

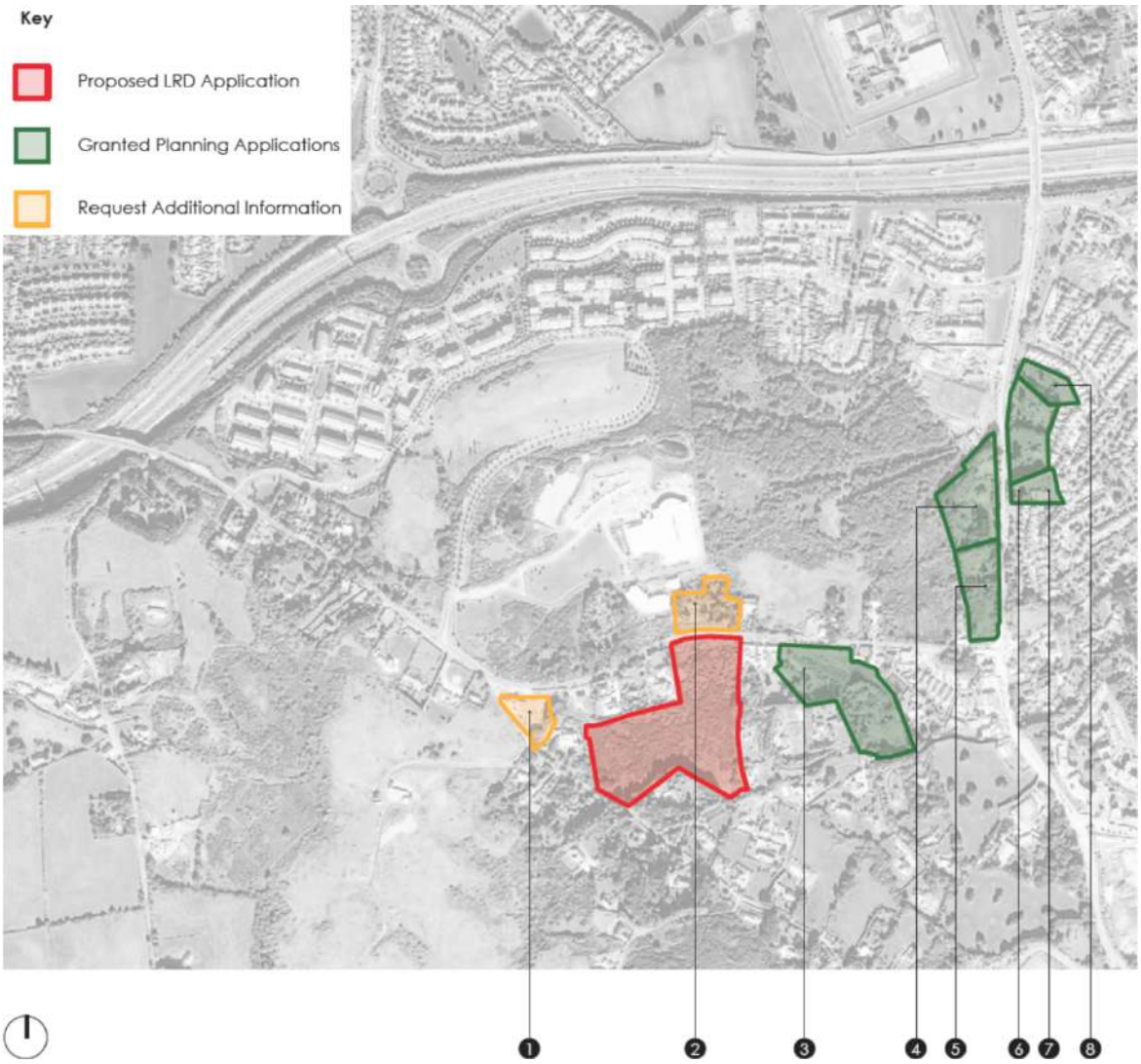


Figure 4 – Future development surrounding the subject site (extract from OMP Design Statement)

There is also the existing neighbourhood centre at Lambs Cross located 400m from the subject site (eastern side), which is well served by existing community infrastructure and amenity space. The site is also strategically located in close proximity to the established area of Sandyford village and the amenities and services offered there.

We further note that there is a significant quantum of services, facilities and amenities located in the immediate surrounding area, this includes: medical centre, dentist, vet, pharmacies, shops, cafes/restaurants, bars, gyms and banks for example. There are also a number of schools, childcare facilities and other educational services in the surrounding area.

With regards to Sandyford, it is a rapidly developing area, with ongoing infrastructure improvements and urban regeneration projects that will enhance the area's connectivity and attractiveness. The site's location within this evolving context means it is well-positioned to benefit from the broader growth of the region, supporting the demand for residential accommodation. This makes it an ideal location for those working in the area, reducing commute times and supporting a balanced work-life environment, which is enhanced by the semi-rural setting, being positioned at the foothills of the Dublin Mountains.

4.3 Public Transportation Infrastructure

The site is served by a number of public transport services, including both Luas and bus routes as illustrated in Figure 5 and discussed below.

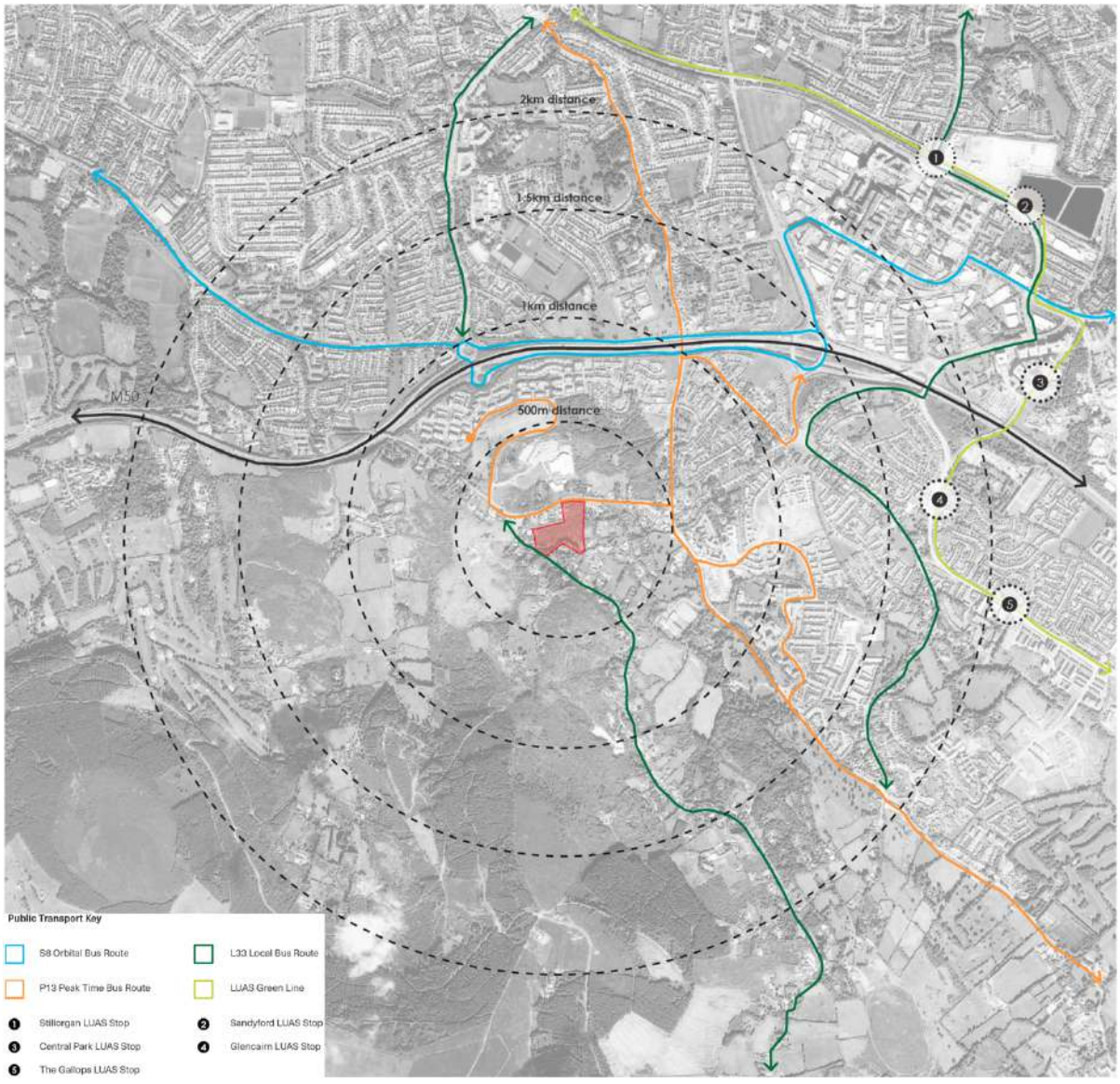


Figure 5 – Strategic site location – transport

4.3.1 Bus Service

The northern boundary of the site is located approximately 120m (2-minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 East and stop 3494 West, which is served by Dublin Bus Service No. 44B and Go ahead service 114.

These services operate during peak hours, every 30 minutes, and provide connections to the following nearby urban centres. Dublin Bus 44b provides a connection between the Dundrum Luas Station, Dundrum, Sandyford and Glencullen. Go Ahead service 114 provides access to Blackrock Station, Stillorgan Road, Ravenscourt Park and Rockview.

Neither bus route currently provides connections to the city centre. It is noted that BusConnects' plan for the area includes the introduction of bus services 86, 87, 88 and L33. Although these services will provide connections to the city centre, they are not expected to be "high frequency".

The exact location of the stops in relation to the development can be seen in the figure below.



Figure 6 – Bus stops in vicinity of the development

4.3.2 Luas Service

The northern boundary of the site is located approximately 1.9km (27 min walk & 9 min cycle) from Glencairn Luas stop (Green Luas Line). This station provides access to Brides Glen in the east and Broombridge in the north. This forms part of the wider Luas network throughout the Greater Dublin Area and links the site directly to Dublin City Centre and the Red Luas line, as set out in the following figure.

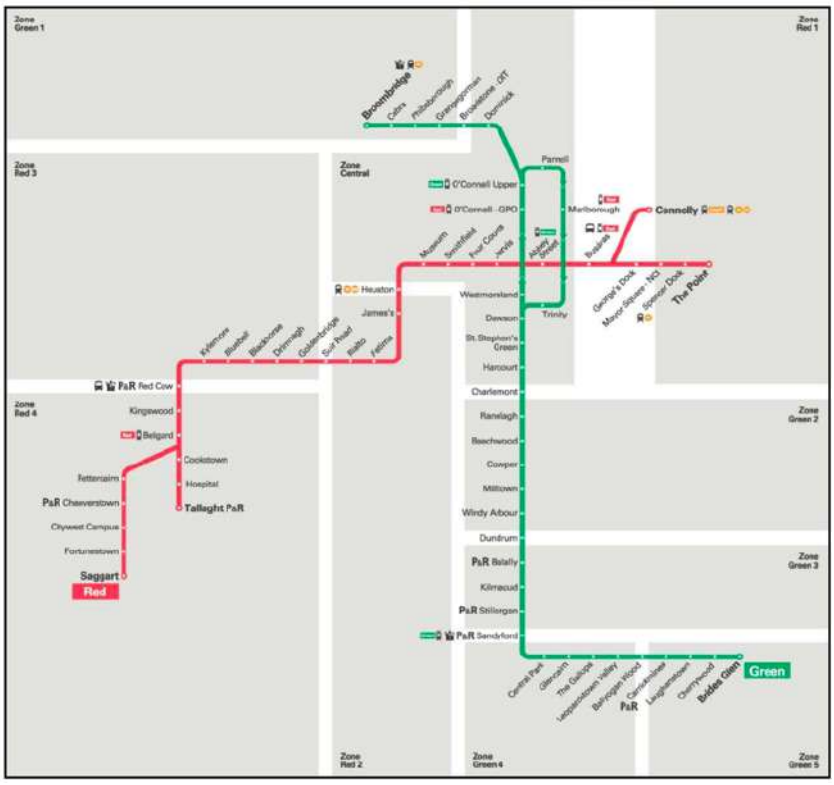


Figure 7 – Luas map

The frequency of the Luas Green Line at the Glencairn Station is shown in the tables below:

Period	Northbound			Southbound		
	Min	Avg	Max	Min	Avg	Max
05:44 – 07:00	10	16	20	6	12	21
07:00 – 10:00	6	9	14	4	9	14
10:00 – 16:00	12	13	14	13	13	15
16:00 – 19:00	6	10	16	6	10	14
19:00 – 00:14	12	13	15	10	13	19

Figure 8 – Glencairn Luas frequency (Monday-Friday)

Period	Northbound			Southbound		
	Min	Avg	Max	Min	Avg	Max
06:44 – 10:00	15	16	20	6	16	27
10:00 – 16:00	14	14	15	8	14	23
16:00 – 19:00	14	14	14	14	14	14
19:00 – 00:14	7	14	15	13	14	15

Figure 9 – Glencairn Luas frequency (Saturday)

Period	Northbound			Southbound		
	Min	Avg	Max	Min	Avg	Max
07:14 – 12:00	12	14	20	5	14	27
12:00 – 19:00	12	12	12	12	12	12
19:00 – 23:14	12	13	15	12	13	17

Figure 10 – Glencairn Luas frequency (Sunday & Bank Holidays)

The LUAS provides frequent high capacity services to and from the City Centre. There are bus stops on Blackglen Road and Lamb's Cross which provide good connectivity to the surrounding area and other modes of public transport. The 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station.

4.3.3 Cycling and Walking

The local cycle facilities within DLR currently consist of Radial and Orbital Cycle Routes, which span most of the county. The radial routes mainly service north-south movements, while the orbital routes service east-west movements. The recently completed Blackglen Road Improvement Scheme has significantly improved walking and cycling infrastructure in the area by adding cycle tracks and footpaths to Blackglen Road. Internal active travel infrastructure at the development will tie in with the newly constructed cycle tracks and footpaths to ensure residents have a high degree of accessibility via these modes. This will significantly improve accessibility for this development.

4.3.4 Blackglen Road Improvement Scheme

As previously noted above, transport infrastructure in the area is being upgraded by way of the Blackglen Road Improvement Scheme, which is recently complete.

As detailed by the accompanying TTA by O'Connor Sutton Cronin, the proposed development shall incorporate these improvement works. The Scheme provides high-quality walking and cycling infrastructure on the development's frontage, which ties in with the wider network, further increasing accessibility. The development will be accessed off the upgraded Blackglen Road, with a main access road providing footpaths and cycle facilities through the site to the Woodside Road boundary. Proposed vehicular access to the site will also be via the Blackglen Road and this will be designed as a priority junction.



Figure 11 – Blackglen Road Improvement Scheme (subject site outlined in red)

It is worth noting that the improvement works will facilitate a Quality Bus Corridor, which will integrate the proposed development with a network of radial and orbital bus priority routes with established high quality and frequency bus and rail routes with connections across Dublin City. New bus priority will improve the connectivity and linkages between the site and other employment, educational and recreational amenities and services in the wider Dublin area.

Additionally, Sandyford Road is identified in the Development Plan 2022 as having a 6-year Road Objective, which if delivered, will significantly increase the capacity of the road network, which may support additional bus services available to future residents of the proposed development, in line with Bus Connects.

5 PLANNING HISTORY

There is an extensive planning history pertaining to the subject site and immediate surrounding which has been given consideration in the design of the scheme.

5.1 Subject Site

Reg. Ref. ABP314459-22

Permission was sought on 26 August 2022 for a Strategic Housing Development on a site of c. 3.7 ha at Blackglen Road and Woodside Road, Sandyford, Dublin 18.

The development consisted of a new residential scheme comprising 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings (A1 - C3) as follows:

- Block A1 (4 storeys) comprising 18 no. apartments (3 no. 1 bed units and 15 no. 2 bed units); a crèche facility of approx. 401 sq. m with associated outdoor play space of approx. 20 sq. m; and resident amenity facilities of approx. 30 sq. m.
- Block A2 (3-4 storeys) comprising 24 no. apartments (2 no. 1 bed units and 22 no. 2 bed units) and resident amenity facilities of approx. 390 sq.m.
- Blocks B1 and B2 (2-6 storeys) comprising 69 no. apartments (30 no. 1 bed units, 34 no. 2 bed units, 5 no. 3 bed units).
- Blocks B3 and B4 (2-6 storeys) comprising 62 no. apartments (30 no. 1 bed units, 27 no. 2 bed units and 5 no. 3 bed units).
- Blocks C1, C2 and C3 (3-6 storeys) comprising 187 no. apartments (58 no. 1 bed units, 126 no. 2 bed units and 3 no. 3 bed units); and resident amenity facilities of approx. 187.5 sq. m.

Each residential unit was afforded with associated private open space in the form of a terrace / balcony.

Total open space (approx. 22,033 sq. m) was proposed in the form of public open space (approx. 17,025 sq. m), and residential communal open space (approx. 5,008 sq. m).

Podium level / basement level areas were proposed adjacent to / below Blocks A2, B1, B2, B3, B4, C1, C2 and C3 (approx. 12,733 sq. m GFA). A total of 419 no. car parking spaces (319 no. at podium/basement level and 100 no. at surface level); to include 80 no. electric power points and 26 no. accessible parking spaces); and 970 no. bicycle spaces (740 no. long term and 230 no. short term), and 19 no. motorcycle spaces are proposed. 10 no. car spaces for crèche use are proposed at surface level.

Vehicular/pedestrian and cyclist access to the development were to be provided via Blackglen Road to tie in with the Blackglen Road Improvement Scheme. A second access was also proposed via Woodside Road but this access was to be for emergency vehicles and pedestrian and cyclist access only.

The proposal also provided for Bin Storage areas and 4 No. ESBN substations to supply the development. 3 no. sub-stations shall be integrated within the building structures of Blocks B and Blocks C. In addition, one Sub-station shall be classed as a unit sub-station mounted externally on a dedicated plinth.

The associated site and infrastructural works included provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; green roofs; boundary treatment; internal roads and footpaths; electrical services; and all associated site development works.

Permission was **REFUSED** on 6 July 2023 due to three reasons that are discussed and positively addressed in Section 4 of this report. The applicant and the design team have taken on board the reasons for refusal and have made every effort to provide a new scheme that is reflective of the feedback from the Planning Authority, which has considered the *Ticknock to River Dodder wildlife corridor,* whilst having regard to the new standards set out in the recently adopted *Sustainable and Compact Settlement Guidelines*.

Reg. Ref. D01A/0763 & ABP PL06D.131236

Permission was sought on 1 July 2002 for 44 no. dormer bungalows in two separately accessed areas at Woodside, Sandyford, Dublin 18. Area 1 (east) 24 no (8 no. 4 bed, 15 no. 4/5 bed, 1 no. 4 bed with basement garage) with access to Black Glen Road. Area 2 (west) 20 no. (8 no. 4 bed, 12 no. 4/5 bed) with access to Woodside Road with on and off site development works.

Permission was **REFUSED** on 24 June 2003 due to the pending completion of road completion of road improvement works on Blackglen Road and an existing deficiency in the provision of water supplies or sewerage facilities.

It's noted that this application was subject to a first party appeal (PL06D.131236), which was refused on 20 November 2003.

D07A/0425 & ABP PL06D.223989

Permission was sought on 30 March 2007 for a development consisting of 224 residential units (130 no. apartments, 58 no. duplexes and 36 no. houses), an underground car park for 149 cars, and surface parking for 206 cars and a crèche, all on a development site of area 3.693 hectares (9.125 acres) at the main location - Blackglen Road & Woodside Road, Sandyford, Dublin 18.

Permission was **REFUSED** on 24 May 2007 due to its location, height, scale, massing, unit mix daylight and sunlight, open space and the upgrading of the Blackglen Road/Harold's Grange Road Improvement Scheme.

It's noted that this application was subject to a first party appeal (PL06D.223989) however, this appeal was subsequently withdrawn.

D07A/1598 & ABP PL06D.227869

Permission was sought on 19 November 2007 for development comprising of 36 no. houses, 2 no two storey dormer terraced houses, and 142 no apartments, surface car parking for 282 cars, a single storey crèche. This proposed development was on a site of area 3.693 hectares (9.125 acres) at Blackglen Road and Woodside Road.

Permission was **REFUSED** on 22 January 2008 due to the location of the site in a transitional zone, its height, scale, bulk and design, the upgrading of the Blackglen Road/Harold's Grange Road Improvement Scheme and open space.

It's noted that this application was subject to a first party appeal (PL06D.227869), which was refused on 26 September 2008.

On review of the scheme (at An Bord Pleanála stage), the case inspector noted the following key reason for refusal:

> *"Having regard to the existing deficiency in the road network the area, in particular the lack of a continuous footpath along the Blackglen road, between the site and Lamb's Cross and the period within which the constraints involved might reasonably be expected to cease, it is considered that the proposed development would be premature, would endanger public safety by reason of traffic hazard and would, therefore, be contrary to the proper planning and sustainable development of the area".*

ABP-307157-20

The application site was subject to a previous SHD Consultation with the Planning Authority and An Bord Pleanála for 153 no. apartment units, which did not reach formal lodgement stage.

5.2 Surrounding Area

Please refer to the appendices for **the planning history on the surrounding area.**

5.3 Planning Comment on Planning History

From an assessment of the planning history at the subject site and surrounding lands, it is apparent that there are a number of factors and considerations held by the Planning Authority and An Bord Pleanála in respect of the subject site pertaining to the form and function of its development.

In this regard, it is submitted that full consideration of previous reasons for refusal and advice received at pre-planning stage, which in turn has shaped and guided the development proposal now before the Planning Authority. All concerns therefore should now be addressed, and recognition given to the proposed scheme as representing the most appropriate form of development for this site.

The form and scale of what is currently being applied for on the application site also mirrors that of developments pending permission along Blackglen Road, which is undergoing significant change in the context of its urban form and function.

Overall, the above planning history confirms that the development of the site for residential purposes is accepted in principle. It is further submitted that consideration of the subject site for residential development is no longer premature given the recently completed Blackglen Road Improvement Scheme has significantly improved walking and cycling infrastructure in the area.

The reasons for refusal of this application are discussed in further detail in Section 6 below along with the Applicant's response to how the scheme has addressed these reasons for refusal.

5.4 Statutory Notices

There are no statutory notices of relevance to the subject site.

6 ADDRESSING REASONS FOR REFUSAL (SHD Ref. 314459-22)

Reason 1

"Having regard to the site's locational context at the fringe of the outer suburban area at the foothills of the Dublin Mountains, within Landscape Character Area 9: Barnacullia as identified in Appendix 9 Landscape Assessment Study and Landscape and Seascape Character Aras and within a Transitional Zone as identified in Section 13.1.2 of the County Development Plan it is considered that inadequate consideration was given to the design approach at this sensitive location and that the proposed height, scale, design and layout of the proposed scheme fails to integrate into or enhance the character of the surrounding area and would not make a positive contribution to place making. The proposed development would, therefore, be contrary to Policy Objective GIB2 Landscape Character Areas and to the provisions to Section 13.1.2. Transitional Zonal Area of the County Development Plan. The scheme would also be contrary to the provisions of Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities and the principles of the Guidelines for Sustainable Residential Developments in Urban Areas and the Accompanying Urban Design Manual and would be seriously injurious to the visual amenities and character of the area and would therefore, be contrary to the prosper planning and sustainable development of the area."

Applicant Response:

It is the design team's full intention for the proposal to be in accordance with national and regional development plan policy and provide a scheme that appropriately integrates into and enhances the character of the surrounding area to make a positive contribution to place making, without negatively impacting the visual amenities and character of the area. The design team has also provided a fresh outlook on the site constraints and opportunities in the design of the proposed scheme.

The design strategy from the outset took into consideration the site's locational context within a transitional zone where peri-urban landscape meets with the rural landscape of the foothills of the Dublin Mountains within the historic Barnacullia Landscape Character Area (LCA).

Considering the Barnacullia LCA and the sensitive character of the receiving environment, the height, scale, design and layout of the previously proposed development has been significantly reduced and altered, as recommended in the Chief Executive's Report - "*given the overall massing and length of Blocks C1, C2 and C3 this should be removed from the permitted development, should permission be granted.*"

The applicant has given due consideration to the above reason for refusal with the proposal being subject to a significant redesign to take into full consideration the concerns set out in detail in both the reason for refusal and within the Inspector's Report. The proposed development is fully adherent to the Development Plan Policy Objectives in terms of height, scale, design and layout and protection of the historic Barnacullia Landscape Character Area. Compliance with all policies and objectives in this regard are outlined within the relevant sections of this Planning Report.

The scheme has been reduced from an initially proposed 360 no. units under the SHD application to 192 no. units in the application herein. Block's C1, C2 and C3 have all been removed and have been replaced with duplexes (C1, C2 & C2A) and houses (D1 & D2). Omitting the apartment blocks responds to the site's sensitive location and successfully integrates the development into its immediate context, without impacting upon the visual amenities and character of the area.

In addition to omitting Block's C1, C2 and C3, the main changes to the scheme consist of an overall reduction in development size by reducing the number of storey's from 2-6 to 2-5 storey's throughout the scheme, resulting in significantly reduced height and scale. As illustrated in the figure below, all the lower hillside apartments have been reduced in scale from 2-6 storeys to 2-5 storeys in line with feedback from the planning authority.



Figure 12 – Main changes to SHD Site Plan

Moreover, the basement for block A2 previously proposed has also been removed, along with the secondary vehicular access road, resulting in a lower density scheme that presents an opportunity to reduce car parking provision (refer to Figure 13).

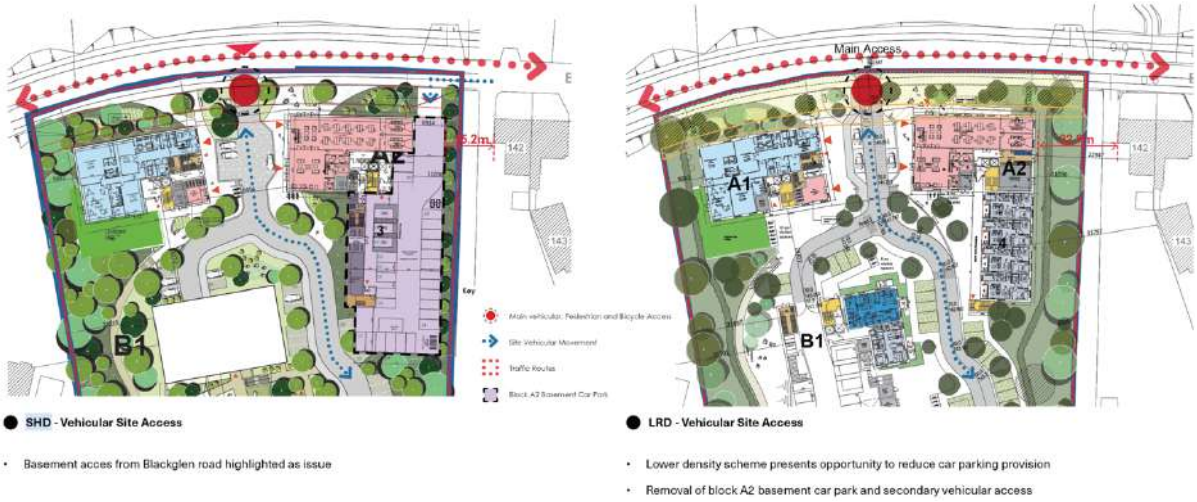


Figure 13 – Vehicular access changes

As illustrated in Figure 14, the pedestrian access from Woodside Road has also been removed due to the condition of the road, which allow the main access from Blackglen road to service all vehicles, pedestrians and bicycles.



Figure 14 – Removal of pedestrian access from Woodside Road

Comparing the scale and quantum of development between the previous scheme and that now proposed, it's clearly evident that significant changes have been made in terms of a reduction in building height, scale and mass, design and layout, and development density, which will serve to mitigate any perceived negative impacts arising from the development of these lands, in terms of inter alia residential amenity etc.

These changes reflect the transitional zoning of the site and prioritize the character of the Dublin Mountains by successfully integrating into the emerging streetscape, having regard to topography, cultural context and setting of key landmarks. The considered landscape masterplan for the site also addresses the transitional zone nature of the lands, being in immediate proximity to the proposed NHA, Fitzsimons' Wood.

It is therefore submitted that all concerns of the Board have now been addressed in the redesigning of the scheme – full details, features and specifications of the development are set out herein, and the compliance of the scheme with all national and local development objectives, policies and standards is established. It is our considered opinion that the scheme as now proposed therefore fully reflects the proper planning and sustainable development of the area.

Reason 2

"It is considered that the unit mix of the proposed development is contrary to the provisions of Housing Need and Demand Assessment as set out in Appendix 2 and Table 12.1 of the County Development Plan which provisions are considered reasonable. Furthermore, it is considered that the proportion of north facing single

aspect units is unwarranted given the unconstrained nature of the subject site and would result in a substandard form of residential development for the prospective occupants of these units at this location. In addition, having regard to the location of the subject site, which is considered to be peripheral and less accessible by reasons of relative distance from high capacity urban public transport stops and from principal town or suburban centres or employment locations, it is considered that the proposed density of approximately 97 no. units per hectare would not supportable at this location. The proposed development would not provide a mix of apartment units consistent with the relevant provisions of the Development Plan would be contrary to the provisions of these Ministerial Guidelines in relation to density range in this location would constitute a sub optimal form of residential development with regard to the north facing single aspect units. In totality the proposed development would not comprise an appropriate form, density and range of residential accommodation and would therefore be contrary to the proper planning and sustainable development of the area."

Applicant Response:

The previous SHD application proposed a unit mix comprising 123 no. (34%) 1-beds, 224 no. (62%) 2-beds and 13 no. (4%) 3-beds. In the assessment of the scheme the Inspector noted that 123 no. (34%) 1-bed units exceeds the maximum of 30% permitted by the Development plan. Additionally, the Inspector stated that a minimum of 20% (72 no. units) should be provided, instead of the 13 no. (4%) 3-bed units initially proposed. The proposed unit mix was therefore considered a contravention of the Development Plan.

A more sustainable unit mix has been proposed (refer to Figure 15 below), which includes 33 no. (17.2%) 1 bed units, 84 no. 2 bed units (43.8%), 61 no. (31.8%) 3 bed units and 14 no. (7.3%) 4 bed units. It is our professional opinion that the revised scheme on the application lands satisfies the Development Plan standard with a max of 30% 1 beds and a minimum of 20% 3 bed units.

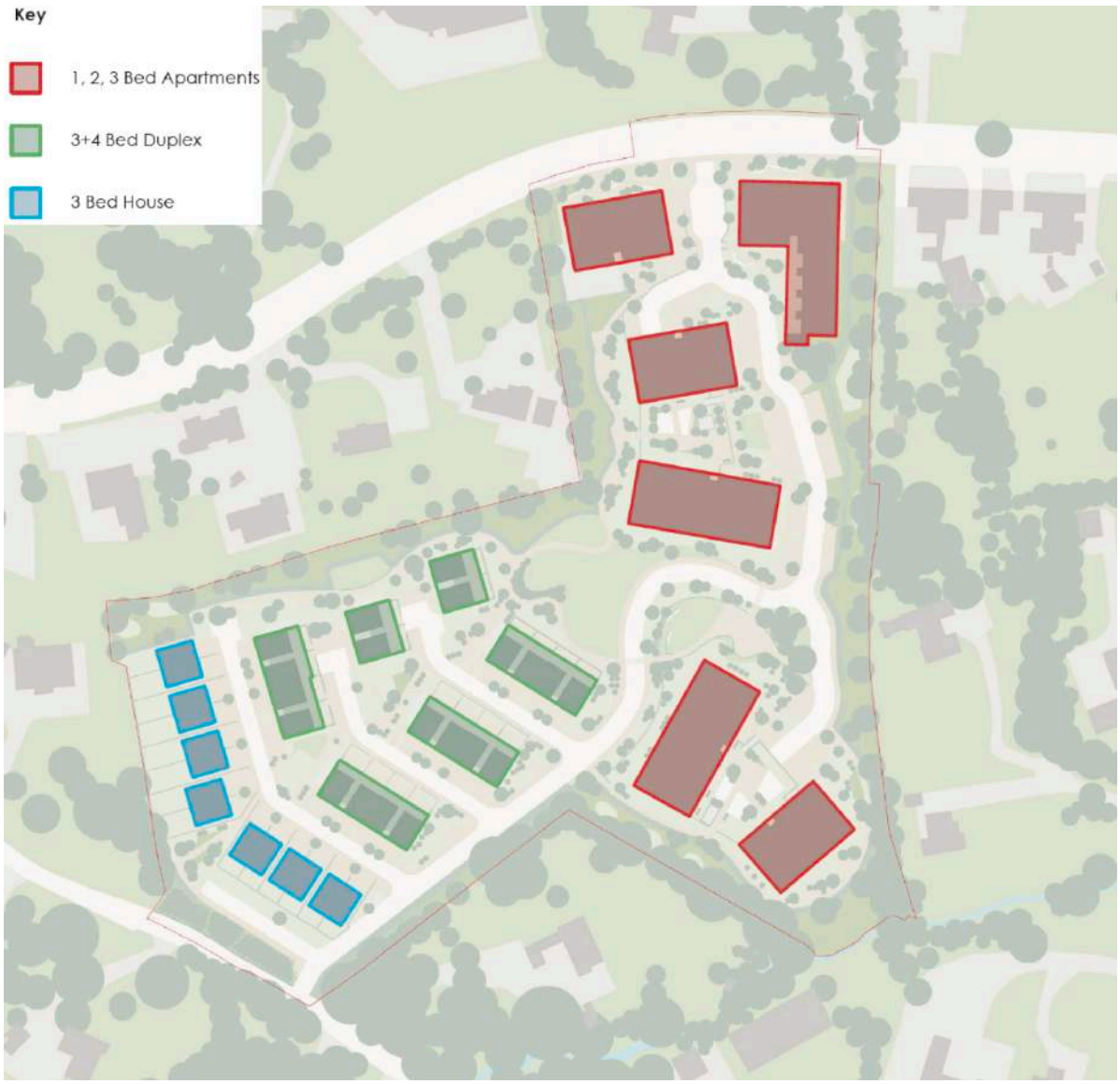


Figure 15 – Unit mix overview (extract from OMP design statement)

Additionally, the Chief Executive's report stated that "*it appears there are instances whereby the Applicant has identified dual aspect apartments that would not be deemed to meet the definition from the Development Plan in that they rely on a kink in the elevation of the larger blocks rather than allowing full views on different directions*", which arises "*in relation to the units located to the centre of blocks C1, C2 and C3, identified by the Applicant as dual aspect but are not considered to meet the Development Plan definition*" (refer to Figure 16).

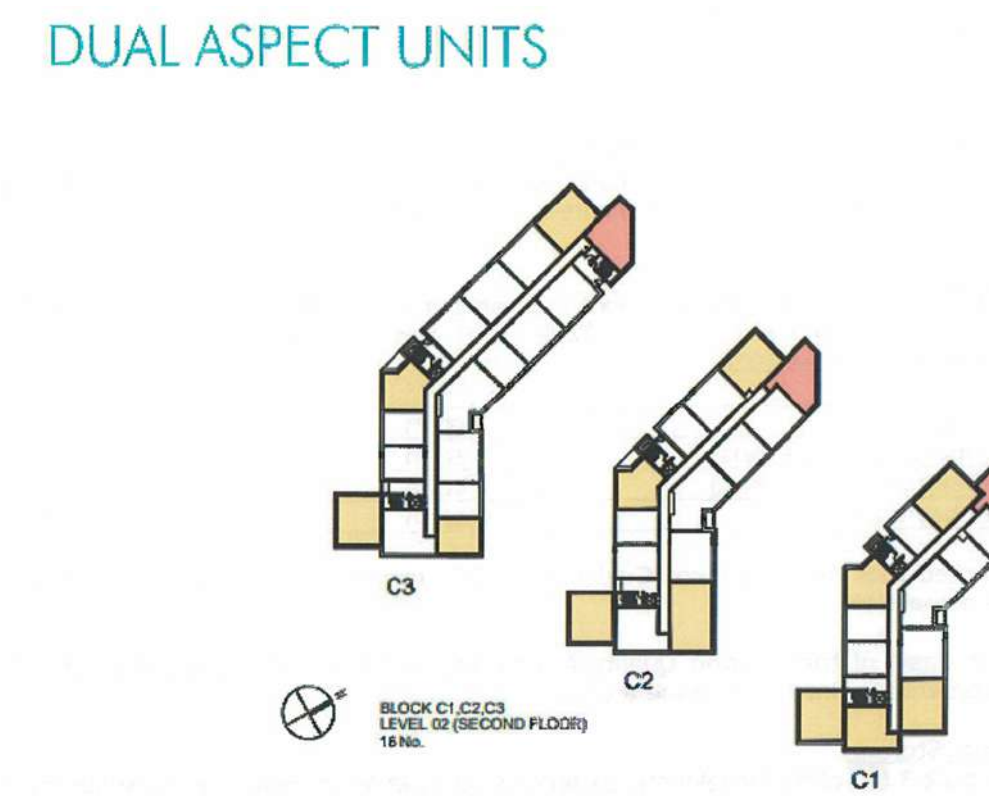


Figure 16 – Extract from Chief Executive's Report - Appendix C of the Architectural design Statement identifying windows to the centre of blocks C1, C2 and C3 as dual aspect (in yellow)

The Inspector's report stated that excluding those 14 no. units from the total quantum of dual aspect results in 167 no. dual aspect units (c. 46%), which is below the 50% threshold. It was considered that this is under provision of dual aspect units was solely motivated by a design decision to maximise the number of units, which is not a result of constraints imposed to the site by the physical or locational characteristics of the site. In addition, it was noted that 45 no. units (12.5%) would be single aspect, north-facing. Considering this, the Chief Executive's report stated that *"the applicant should be invited to consider revising the design of such blocks to introduce breaks along the middle, and hence reduce its massing and increase the number of dual aspect units while reducing the number of single north facing units."*

Overall, the Board considered that as the site was of sufficient size and unrestricted, that the number of single aspect units and north facing units should be strictly limited. Acknowledging this, the current revised scheme show's greater than 50% dual aspect and a minimal number of north facing units, with 80.7% dual aspect units now proposed in this LRD scheme.

Regarding density, the Inspector stated that the proposed density of approximately 97 no. unit per hectare would not be supported at this location, considering the sites peripheral outer suburban location. As previously noted, the Planning Authority recommended that conditions be attached to reduce the height of the scheme to a maximum of 4-storeys and omit Blocks C1, C2 and C3. These amendments would result in an estimated density of c. 55 units per ha, which the planning authority considered to be more appropriate at this location.

Considering such, a density of 59.22 dph is appropriate on this site. Reducing the scheme to predominantly 4 storeys with a maximum of 5 storeys due to the site's undulating topography has allowed the subject development to integrate with the character of the landscape and be more sympathetic to the receiving environment.

It's noted that the B blocks sit sensitively into the natural contours of the site, which hides the podium and basement from the tree trail surrounding the site. The proposed apartment blocks also provide deep setback terraces, with a 2 storey lower element, and typically 3 storey mid-rise elements with a setback level. These set back terraces provide generous landscaped private amenity, which also benefit from wide views to the East.

The plan layout of the B blocks, create raised podiums, combined with the stepped profile of the buildings, reduces the overall massing and visual impact of the proposed apartment blocks.

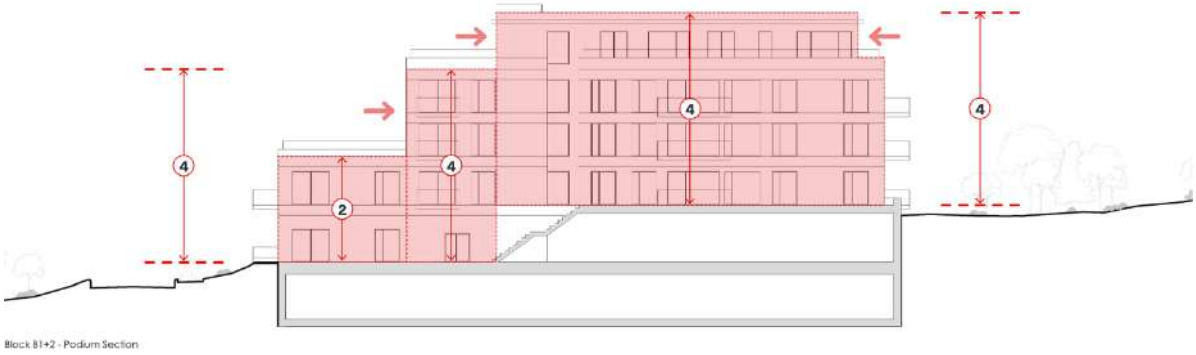


Figure 17 – B1 + 2 – Podium Section (extract from OMP design statement)

In addition, omitting Blocks C1, C2 and C3, and replacing them with duplex and housing units reflects the rural character of Woodside Road.

The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* further state that residential densities in the range of 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations like the subject site. The construction of the Blackglen Road widening works that commenced in 2021 has also been completed. These upgrade works will provide a new network of cycle paths and footpaths to link the site back to the Neighbourhood Centre and wider employment areas.

The proposed development therefore provides a mix of apartment units consistent with the relevant provisions of the Development Plan in relation to density range in this location. In totality, the proposed development would comprise an appropriate form, density and range of residential accommodation and would therefore be consistent with the proper planning and sustainable development of the area.

Reason 3

"Having regard to the site's location within the Ticknock to River Dodder Wildlife Corridor as outlined in the DLR Biodiversity Action Plan 2021-2025 it is considered on the basis of the documentation submitted with the application, that the applicant has not adequately demonstrated how the proposed design and layout of the scheme supports or enhances links to the wildlife corridor which connects the Dublin Mountains to Fitzsimons Wood proposed National Heritage Area. The proposed development would, therefore, be contrary to Objective GIB20 to support the provisions of the DLR Biodiversity Action Plan 2021-2025 and would be contrary to the proper planning and sustainable development of the area."

Applicant Response:

As outlined in the enclosed landscape design rationale, the design team have referred to the sites position on the Ticknock to Dodder River corridor as outlined in the DLR Biodiversity Action Plan 2021-2025 and support Objective GIB20. Documentation enclosed herewith demonstrates how the proposed design and layout of the scheme supports and enhances links to the wildlife corridor, which connects the Dublin Mountains to Fitzsimons Wood proposed National Heritage Area.

As outlined in Section 10.1.6 of this report, the design team has proposed to create a link to the 'Ticknock to River Dodder' wildlife corridor, such as the hedgerow planting or the creation of dedicated wildlife areas. The design and layout of the subject proposal will support and enhance the proposed link to the wildlife corridor, which connects the Dublin Mountains to the Fitzsimons Wood proposed National Heritage Area (pNHA) (refer to Figure 28).

The landscape design has been developed to accentuate the proposed link and green routes through the site. It is further noted that even outside the highlighted zone, the development site aims to maintain and strengthen the green link between these areas, due to their proximity to the site.

Multiple green links are proposed, which shall integrate the proposed landscape design into the existing landscape context to facilitate public permeability through the site south, to the Dublin Mountains and north to Fitzsimons Wood.

Green links are proposed to connect with Fitzsimon's Wood National Park, which shall preserve natural paths for animals, such as deer. This will be provided to the south-east/south side of the side through a wildlife corridor with broom and pine trees, that shall provide habitat diversification and promotion of coexistence (refer to Figure 29).

A public open space tree trail (307 m long & approx. 8m wide) is also proposed to the north-west/west side of the subject site in order to provide another wildlife corridor with oak and birch woods, which shall enrich local biodiversity.

Please refer to the enclosed Ecological Impact Assessment (EclA), prepared by Enviroguide Consulting which details the biodiversity enhancement potential of the site and how this will be achieved and incorporated into the proposed development's design.

7 PROPOSED DEVELOPMENT

7.1 Refused Scheme and Current Proposal

As discussed under Section 5 of this report, an application for a Strategic Housing Development scheme was lodged to An Bord Pleanála on this site for the construction of 360 no. residential units on the 26th of August 2022. Planning Application Reference ABP 314459-22 refers.

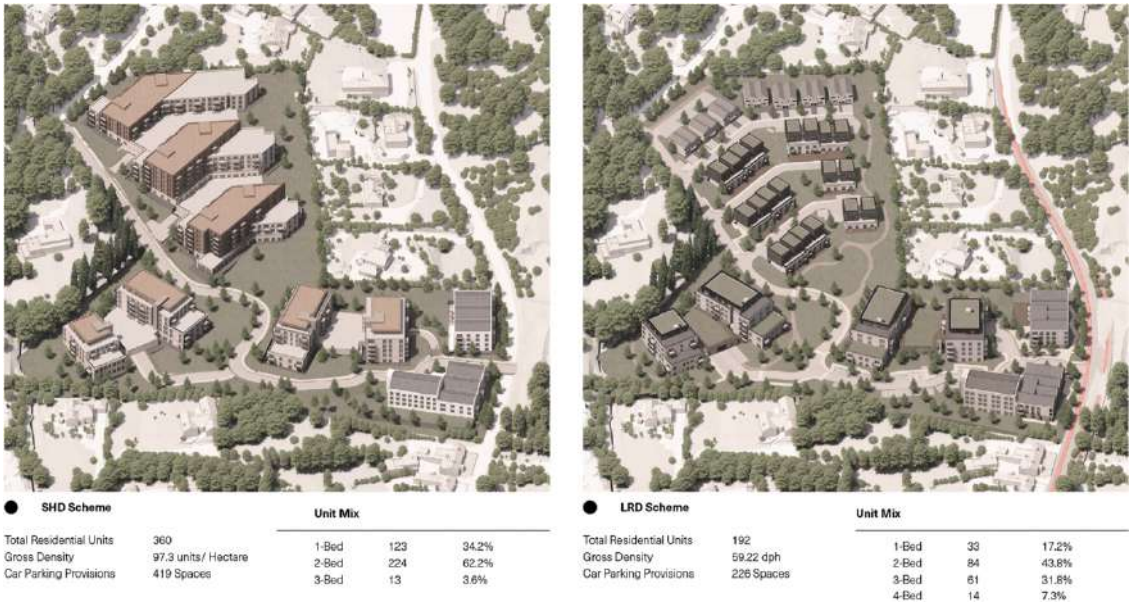


Figure 18 – Previous SHD (left) compared to current LRD (right)

Our client has made a prudent and proactive decision to apply for a new and substantially different LRD scheme for this site, which has positively addressed the reasons for refusal as outlined above in Section 6 of this report. The current proposal and particularly the design, layout, heights and massing now submitted are reflective of the feedback from the Planning Authority on the previous SHD on site. In this context, a fresh perspective has been taken, and the scheme has been progressed with careful consideration to the Ticknock to River Dodder wildlife corridor adjacent to the site, whilst having regard to the new standards set out in the *Sustainable Residential Development and Compact Settlement Guidelines*.

7.2 Key Changes on the Former SHD

A comparison of the key development parameters are set out below:

DEVELOPMENT PARAMETER	ABP REF. 314459-22 (Refused SHD Scheme)	CURRENT DEVELOPMENT PROPOSAL AT STAGE 3 (LRD Application Stage)
Application Site	3.7 ha	**Gross - 38,363 m2 (3.83 ha)** **Net - 32,422 m2 (3.24 ha)**
Development Type	SHD including Childcare Facility	**LRD including Childcare Facility**
Unit Mix	**Total: 360 no. units** 1 Bed units: 123 no (34.2 %) 2 Bed units: 224 no (62.2 %) 3 Bed units: 13 no (3.6 %)	**Total: 192 no. units** <u>Apartment mix –</u> Block A1-2: • 1 Bed units: 5 no (2.6 %) • 2 Bed units: 26 no (13.5 %) • 3 Bed units: 10 no (5.2 %) Block B-4: • 1 Bed units: 28 no (14.6 %) • 2 Bed units: 52 no (27.1 %) • 3 Bed units: 17 no (8.5 %) <u>Duplex apartment mix –</u> • 2 Bed units: 6 no (3.1 %)

		• 3 Bed units: 20 no (10.4%) • 4 Bed units: 14 no (7.3%) <u>Houses –</u> • 3 Bed units: 14 no (7.3 %) **<u>Overall unit mix</u>** • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 84 no (43.8 %) • 3 Bed units: 61 no (31.8 %) • 4 Bed units: 14 no (7.3%)
Density	97.3 units per ha	**59.22 units per ha (net density)**
Plot Ratio	1.11	**0.67**
Site Coverage	39.3% (inc. podium area) 23.8% (exc. podium areas)	**22.2% (8,526 m2)**
Communal Open Space	Total 5,008 sqm	**2,168 m2 (5.4% of site area)**
Public Open Space	Total 17,025 sqm	**8,687 m2 (22.3% of site area)**
Wildlife Corridor	N/A	**4,666 sqm (11.9% of site area)**
Resident Amenity Space	607 sqm (rate 1.68m2/unit)	Block A1 & A2 = 386.9 sqm (Rate 2.01 m2/unit)
Height	2-6 Storeys	**2-4 Storeys** **The only exception is the 5 storey upper level setback to block B1 only.**
Dual Aspect	46% provision	**155 units (80.7%)** • Blocks A1– 12 units (80%) • Block A2 – 22 units (84.6%) • Block B1&B2 – 34 units (66.7%) • Block B3&B4 – 33 units (71.7%) • Block C - 40 units (100%) • Block D – 14 units (100%)
Car Parking spaces	419	**Total - 226 spaces (ratio 1.28)**
Motorbike Parking spaces	N/A	**Total - 9 no. spaces - Breakdown:** Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4
Cycle Parking	970	**Total – 484 no. bike space (ratio 2.52)** 446 no. long stay 38 no. short stay
Childcare Space	401 sqm	**<u>Block A1</u>** 378.2 sqm (childcare facility) 170 sqm (outdoor play area) (43 childcare places)
Part V	36 units	**19 units (block A1 - 15 & block A2 - 4)** <u>Unit Mix</u> • 1 Bed units: 3 no (16 %)

		• 2 Bed units: 6 no (32 %) • 3 Bed units: 10 no (52 %)

Table 3 - Comparative Table of LRD Proposal and previous SHD

The main changes to the scheme consist of an overall reduction in development size by reducing the number of storeys from 2-6 to 2-5 storey's, in addition the omitting of Block's C1, C2 and C3, resulting in significantly reduced height and scale.

Overall, the scheme aims to provide a new diversified model of residential units which responds to the specific site context, through carefully positioned buildings and a public realm strategy that supports and enhances links to the Ticknock to River Dodder Wildlife Corridor, which connects the Dublin Mountains to Fitzsimons Wood.

Key points in the design include:

- New low rise, medium density model of housing;
- Generous protected wildlife corridor;
- Public space at the heart of the scheme with associated tree trails to periphery;
- A varied architectural approach sympathetic to context and views; and
- A variety of house types and sizes responding to context and topography. Lower hillside terraced apartments stepped apartment blocks and Upper Hillside family homes in duplex and semi-detached types creating a transition across the site.

We trust that Table 13 will assist the Planning Authority in reviewing the key differences between the former SHD proposal and that of the current LRD proposal subject of this request.

7.3 Summary of Proposed LRD Development

Zolbury Ltd., intend to apply to Dún Laoghaire Rathdown County Council for planning permission for development for a Large Scale Residential Development (LRD) on a site of approx. 3.83ha on lands at Blackglen Road, Sandyford, Dublin 18.

The development will consist of 192 no. residential units ranging from 2-5 storeys in height, associated resident amenity facilities, a childcare facility, all boundary treatment and landscaping works, site services connections and all site development works to include:

a) Construction of 192 no. residential units, in the form of 6 no. new apartment buildings (A1 – B4), 40 duplexes (C1, C2, C2A) and 14 houses (D1 & D2), to include 33 no. 1-beds, 84 no. 2 -beds, 61 no. 3-beds and 14 no. 4-beds as follows:

   - Block A1 (4 storeys) comprising 15 no. apartments (3 no. 1 bed units, 6 no. 2 bed units & 6 no. 3 bed units); a crèche facility of approx. 378.2 sq. m with associated outdoor play space of approx. 170 sq. m; and resident amenity facilities of approx. 33.3 sq. m.
   - Block A2 (3-4 storeys) comprising 26 no. apartments (2 no. 1 bed units, 20 no. 2 bed units and 4 no. no. 3 bed units) and resident amenity facilities of approx. 353.6 sq. m.
   - Blocks B1 and B2 (2-5 storeys) comprising 51 no. apartments (15 no. 1 bed units, 29 no. 2 bed units, 7 no. 3 bed units).
   - Blocks B3 and B4 (2-5 storeys) comprising 46 no. apartments (13 no. 1 bed units, 23 no. 2 bed units and 10 no. 3 bed units).
   - Duplex Units C1 (4 storeys), C2 and C2A (3 storeys) comprising 40 duplexes (6 no. 2 bed units, 20 no. 3 bed units and 14 no. 4 bed units).
   - House Units D1 and D2 (2 storeys) comprising 14 houses (14 no. 3 bed units).

b) Total Open space (approx. 10,854 sq. m) is proposed in the form of public open space (approx. 8, 686 sq. m), and residential communal open space (approx. 2,168 sq. m). Each residential unit is afforded with associated private open space in the form of a garden/terrace/balcony.

c) The development will be served via a new vehicular access via Blackglen Road. This will be designed as a priority junction with pedestrian and cycle crossings where required to tie in with the Blackglen Road Improvement Scheme.
d) A new toucan crossing is proposed across Blackglen Road just to the east of the new vehicular access. This toucan crossing has been designed as per TL607 of the Cycle Design Manual to allow crossing of pedestrians and cyclists to the northern side of Blackglen Road for improved public transport access.
e) Emergency access only is proposed via Woodside Road.
f) A dedicated wildlife corridor is proposed to the east/south-east side of the site (approx. 442.4 m in length) and a public open space tree trail to the west/north-west side of the site (approx. 307 m in length).
g) Basement/Podium car park areas are proposed below Blocks B1, B2, B3 and B4. A total of 226 no. car parking spaces are proposed, which includes 2 no. car club spaces, 12 no. accessible spaces and 47 no. EV charging spaces (198 no. long-stay spaces, 18 no. visitor space & 10 no. car parking spaces for creche use), in addition to 9 no. motorcycle spaces.
h) A total of 484 no. bicycle spaces are proposed in the form of 446 no. long stay bicycle spaces 38 short-term stay visitor parking.
i) 2 no. ESB substations at surface level.
j) Bin Storage areas for the Duplex blocks are proposed at ground level adjacent to the Duplex blocks.
k) All associated site and infrastructural works to include provision for water services; foul and surface water drainage and connections; internal roads, attenuation proposal; permeable paving; all landscaping works including green infrastructure zones; green roofs; and general plant areas; photovoltaic panels; landscaped boundary treatment; footpaths; public lighting; and electrical services.



Figure 19 – Proposed Site Layout Plan

7.4 Detailed Description

Residential Mix

The residential development mix provides for 192 no. units as follows:

- 33 no. 1-bedroom units (17.2%)
- 84 no. 2-bedroom units (43.8%)
- 61 no. 3-bedroom units (31.8%)
- 14 no. 4-bedroom units (7.3%)

Type	1 bed unit	2 bed unit	3 bed unit	4 bed unit	Total
Apartment Block A1	3	6	6	N/A	15
Apartment Block A2	2	20	4	N/A	26
Apartment Block B1+B2	15	29	7	N/A	51
Apartment Block B3+B4	13	23	10	N/A	46
Duplex Units C1+C2+C2A	N/A	6	20	14	40
Houses D1	N/A	N/A	14	N/A	14
Total	33	84	61	14	192

Table 4– Unit breakdown per block, duplex and house

Residential Density

A residential net density of 59.22 units per ha is proposed on this site. The density is based on 192 units over the net site area – 3.24ha site, which is achieved excluding the area of the main road outside the applicant's ownership from the application site area. The density proposed is considered acceptable given the mandate in national planning policy and the connectivity to public transport within walking distance to the site.

Height

Heights of 2 to 5 storeys are proposed in this case and have been reduced from a maximum of 6 storeys previously proposed under ABP Ref. 314459-22. We are of the opinion that this form of development is appropriate to the site and surrounding context and will not have an overbearing impact on the sensitive character of the receiving environment within the Barnacullia Landscape Area.

These reductions in height also reflect the transitional zoning of the site and prioritize the character of the Dublin Mountains by successfully integrating into the emerging streetscape, having regard to topography, cultural context and setting of key landmarks.

The scheme also responds to its context through sensitively positioning the buildings into the natural contours by providing deep setbacks for the apartments, which respond to the sites sloping landscape. The undulating topography of the site also allows for gradual increases in height to transition to increased development height between 2 to 4 storeys with a stepped approach providing a maximum of 5 storeys to create a variety and visual interest and to comply with the cumulative height's strategy.

The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this greenfield site.

Landscaping and Open Space

The proposed development delivers quality designed landscaped open spaces distributed throughout the site. The landscaped open space areas and elements are divided between several locations throughout the site which gives residents a variety of open space areas to avail of. A total of approx. 10,854.65 sqm open space is proposed in the form of:

- Public Open Space (c. 8,686.56 sqm – 22.27%) in the form of an arrival plaza, public tree trail, and play provision accommodating outdoor seating, planting, pedestrian and cyclist links;

- Residential/communal semi-private open space (c. 2,168.09 sqm – 5.44%) including podiums/courtyards, play provision, local area for play and accessible roof gardens.

We refer the Planning Authority to the enclosed drawings and Landscape Design Rationale prepared by Gannon and Associates Landscape Architects. The Landscape Design Statement demonstrates that the scheme prepared for this development is founded on a strong awareness of the site context and the established landscape character. The landscaping proposal enhances the development and ensures that the individual amenity of the units and wider residential amenity of the scheme is of high quality. Comprehensive landscaping proposals are included for the proposed development including a range of facilities for children of different ages, parents and the elderly.



Figure 20 – Landscape Masterplan extract

Wildlife Corridor

A dedicated wildlife corridor is proposed to the east/south-east side of the site (442.4m long, approx. 10m wide & 4665.70sqm– 11.91% of site), which will promote habitat diversification and coexistence, whilst connecting the Dublin mountains to Fitzsimon's wood.

Private Open Space

All apartments, duplexes and houses have access to private open space in the form of balconies, terraces, and gardens in compliance with the standards set out in the 2023 Apartment Guidelines, the recently adopted Sustainable Residential Development Compact Settlement Guidelines and the Development Plan 2022-2028.

Dual Aspect

The scheme provides 80.7% dual aspects units, 155 no. units in total as identified on the enclosed Accommodation Schedule.

Part V Proposal

Part V proposal provides for 19 units, (10% of the total 192 no. units), which meets the social housing requirements of Dún Laoghaire-Rathdown County Council.

Refuse Storage

Duplexes and apartments are provided with shared Waste Storage Areas (WSA's) containing a four-bin wheelie bin system. Figure 21 demonstrates the location and the internal layouts of the shared Waste Storage Areas.

6 no. bin stores are provided within the communal amenity spaces to serve the apartment units. These WSA's are centrally located to ensure security and ease of access for residents throughout the development. Block A1 is also equipped with an adequate internal bin store for the use of the proposed creche.

5 no. bin stores have also been provided for the proposed Duplexes, which are between every 8 no. duplex units.



Figure 21 – Location and Internal Layout of Residential Waste Storage Areas (Yellow)(extract from Enviroguide's OWMP)

It is noted that the proposed Block D semi-detached houses each include a side entrance, which shall allow residents to transport a three-bin system, from the front to the back garden, where they will be stored.

Car Parking

A total of 226 no. car parking spaces at basement, podium and surface level are proposed, which includes 2 no. car club spaces, 12 no. accessible spaces and 47 no. EV charging spaces (198 no. long-stay spaces, 18 no. visitor space & 10 no. car parking spaces for creche use), in addition to 9 no. motorcycle spaces.

Bicycle Parking

A total of 484 no. bicycle parking spaces, which include 446 no. resident bicycle parking spaces and 38 no. visitor bicycle spaces at basement and surface level.

Access

The proposed vehicular, pedestrian and bicycle access point is provided to the development via Blackglen Road. The site will also feature access on the southwestern side, on Woodside Road, however, this will only be used as emergency access.

Future Connections

The proposed development provides two future links:

- The first link to the South allows for connection to Woodside Road if this is ever upgraded.
- The second connection to the East allows for permeability between the proposed development and any possible future developments.

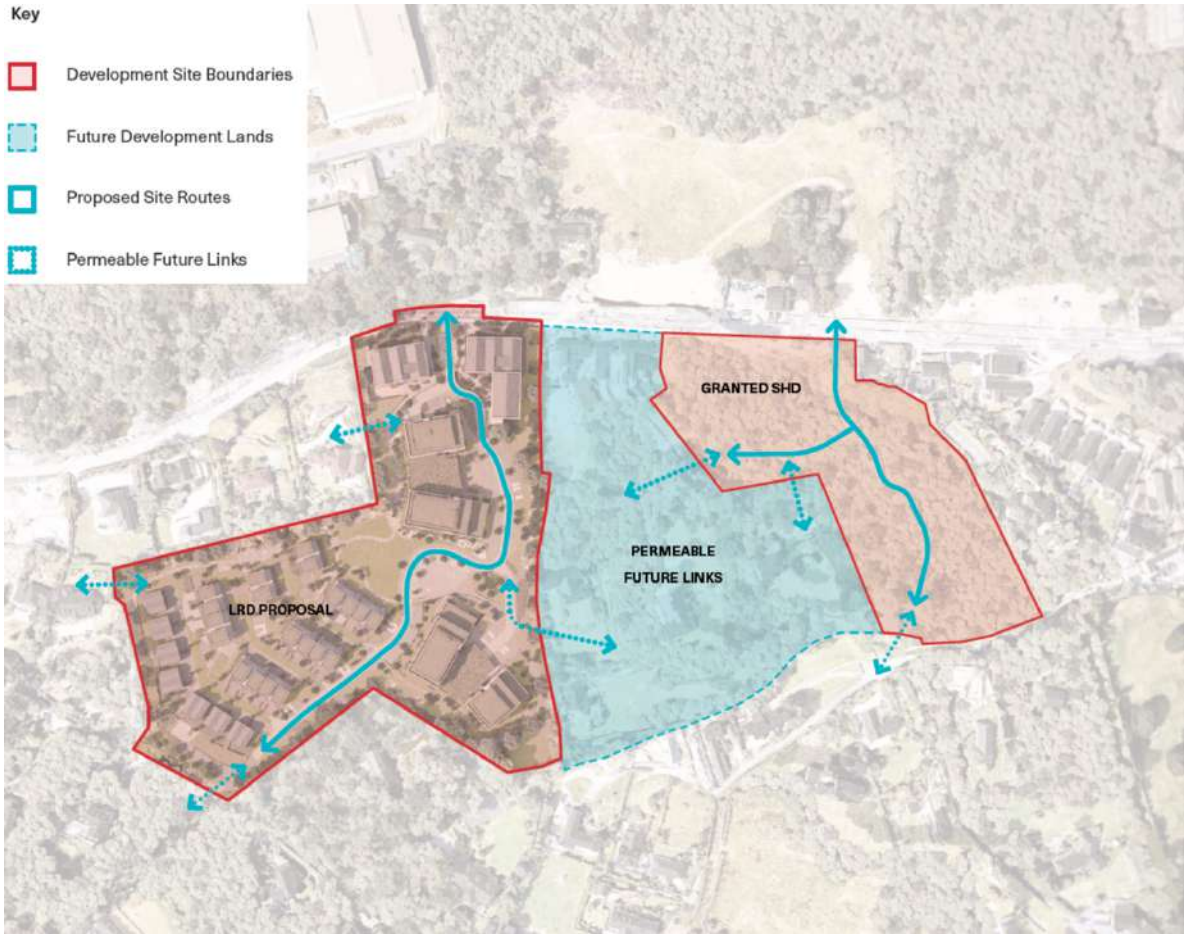


Figure 22 – Future connections (extract from OMP Design Statement)

Childcare Provision

A childcare facility of c. 378.2 sqm is proposed at ground floor level of Block A1. The childcare facility has been designed to provide for the childcare needs of the proposed development with a capacity of up to 62 no. children depending on ages. This is over the 42.4 no. required as per the Guidelines for Planning Authorities on Childcare Facilities (2001). The creche is also afforded an appropriate outdoor play area (c. 170 sqm).

CGIs

For the previous SHD application for the site, Modelworks assessed 23 no. viewpoints for potential visual impact informed by verified photomontages. The same viewpoints have been selected to represent the key receptors and sensitivities in the receiving environment and are assessed in the enclosed LVIA.

Additionally, in the pre-planning consultation process, DLRCC was invited to request additional viewpoints to inform the assessment. The Council requested 5 no. additional views. These are included in the set as Viewpoints 05b, 08b, 10b, 11 and 24b. Photomontages (viewpoints 10b, 11, 24b) illustrate that the development will not be visible.

Residential Amenity

The ground floor of Block A2 welcomes residents from the development entrance with a striking reception and Lounge, the concierge here will serve the residents needs from parcel delivery.

Opening onto the entrance plaza, there will be an open and bright co-working space to offer the residents an alternative to their work from home routine. This co-working space will help to animate the developments presence to Blackglen Road and build on the sense of community across this development.

The ground floor of Block A1 hosts a bike hub for residents, offering a location to maintain and clean their bicycles, electric bicycles and electric scooters.

8 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT

8.1 Strategic Planning Policy Documents

It is our considered opinion that the key policy documents for consideration as part of this Statement of Consistency are identified as follows:

- Housing for All: A new Housing Plan for Ireland
- Project Ireland 2040: National Planning Framework (2018);
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031
- Regional Planning Guidelines for the Greater Dublin Area 2010–2022
- Design Manual for Urban Roads and Streets 2019
- Smarter Travel – A New Transport Policy for Ireland 2009-2020
- Transport Strategy for the Greater Dublin Area 2022-2042
- Delivering Homes, Sustaining Communities (2008)
- Best Practice Guidelines - Quality Housing for Sustainable Communities
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2023)
- Urban Development and Building Height Guidelines (2018)
- Design Manual for Urban Roads and Streets (DMURS) (2013)
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)
- Guidelines for Planning Authorities on Childcare Facilities (2001)

We would welcome comment on the proposed content of the application and would appreciate direction on the extent of the national and regional policy documents for this planning application.

8.1.1 Housing For All – All New Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will "*Introduce the Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.*"

In addition to this, the new fund will focus on "*activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.*" The fund will "*stimulate activation of existing planning permissions for* ***build-to-sell apartment developments*** *of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.*"

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: "*Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.*"

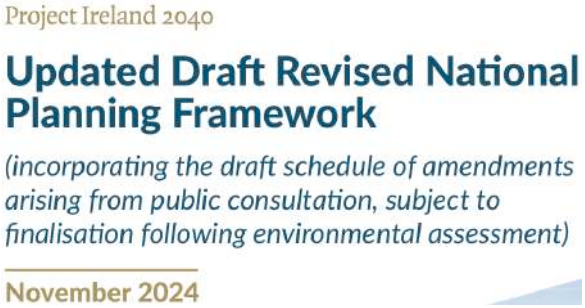
Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: "*Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.*"

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will "*Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.*"

The subject proposal provides 192 no. new residential units which will contribute towards the government's target deliverance of 33,000 new residential units per year between 2021 and 2030.

We submit that the proposal is consistent with Housing for All – A New Housing plan for Ireland.

8.1.2 National Planning Framework – Project Ireland 2040



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The NPF was originally published in 2018, and a draft revision went on display in July 2024. An updated Draft Revised National Planning Framework was published in November 2024 and is detailed below.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, this Plan sets out the long-term context for the Country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high - level objectives of the Plan are:

- To continue a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodates and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 3 million people, at least half a million more than today. It is identified that the region's most significant place-making challenge will be to plan and deliver future development in a way that enhances and reinforces its urban and rural structure and moves more towards self-sustaining, rather than commuter driven activity, therefore allowing its various city, metropolitan, town, village and rural components to play to their strengths, while above all, moving away from a sprawl-led development model.

The national planning framework also promotes the creation of mixed tenure communities by stating *"more home and more affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities."*

The NPF recommends the following in relation to compact urban development *"At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects within the existing built up footprint, and a more compact urban form, facilitated through well-designed higher density development."*

It is also apparent from the NPF that low-density housing development, and underused sites, have been a feature of Ireland's housing landscape in cities, towns, and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in the urban areas.

The sites zoning allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.

It is submitted that the current proposal for 192 no. new residential units and a childcare facility will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies is appropriate at this highly accessible site, catering to a wide demographic of potential future residents.

The following policies are considered key in the context of this site:

National Policy Objective 3 -
Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.

National Policy Objective 7 -
Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 8 –
Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

National Policy Objective 14 -
Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

National Policy Objective 20 -
In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 22 -
In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.

National Policy Objective 41 -
Prioritise the alignment of targeted and planned population and employment growth with investment in:

- *A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;*
- *The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;*
- *The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and*
- *Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.*

National Policy Objective 42 -
To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

National Policy Objective 43 -
Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 44 –
Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 45
Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

It is noted at this stage that the process to review, update and revise the National Planning Framework began in 2023. A Draft Revised NPF document was on display, and submissions were invited between the period of 10th July 2024 and 12th September 2024. This revision has not yet come into effect and is welcomed by the applicant and design team in the context of the proposed development, and the contribution of the proposal towards the realisation of a number of key national policies and objectives.

We submit that the proposal for a high-density residential development at this highly accessible location is consistent with the National Planning Framework for 2040.

8.1.3 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that "*Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.*"

The plan repeatedly states the need for housing to be in appropriate locations, "*In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.*"

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 192 new residential units at a key location adjacent to services and amenities. The site has the benefit of accessibility to public transport services along Blackglen Road and is considered a significant opportunity site for the delivery of residential units. The proposal also supports Pillar 2 and will provide for 19 no. Part V units.

We submit that the proposal is consistent with the Action Plan for Housing and Homelessness.

8.1.4 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly* (RSES) was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the 'Dublin City and Suburbs' and is part of the Dublin Metropolitan Area.

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

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

*"**RPO 5.5:** Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on **the consolidation of Dublin and suburbs**, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns."*

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities.

In terms of consolidation an re-intensification, the following policy objective is noted:

Consolidation an Re-Intensification

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

We submit that the proposal complies with the RSES as it will deliver the appropriate residential density of 59.22 units per ha having regards to the '2009 Sustainable Residential Development in Urban Areas', '2022 Sustainable Urban Housing – Design Standards for New Apartments' and '2018 Urban Development and Building Heights Guidelines for Planning Authorities'. The proposal site is ideally placed to provide the consolidation of Dublin city and suburbs with adequate supporting infrastructure to support the intensification of this greenfield site.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 59.22 units per ha and has had regard specifically to *standards as set out in the 'Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2022)' and 'Urban Development and Building Heights Guidelines for Planning Authorities (2018)'* in ascertaining an appropriate residential density, height, and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The proposal utilises a prime suburban/rural site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this intermediate and peripheral area of Dublin.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

8.1.5 Smarter Travel - A New Transport Policy for Ireland 2009-2020



The Government has committed in 'Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020' to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key goals of the Guidelines are as follows:

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

Achieving sustainable transport will require a suite of actions that will have complementary impacts in terms of travel demand and emissions. These are as follows:

- Actions to reduce the distance travelled by private car and encourage smarter travel.
- Actions aimed at ensuring that alternatives to the car are more widely available.
- Actions aimed at improving the fuel efficiency of motorised transport.
- Actions aimed at strengthening institutional arrangements to deliver the targets.

Smarter Travel acknowledges that good progress is being made in meeting the above targets and actions by providing better guidance on planning and development through the delivery of Planning Guidelines.

A Traffic & Transportation Assessment Report prepared by O' Connor Sutton Cronin Consulting Engineers is submitted as part of this pre-application submission which ensures that, in-so-far-as-possible, the impacts of traffic are reduced and minimised where practical.

We submit that the proposal for a residential development at this location is supportive of the objectives of Smarter Travel - A New Transport Policy for Ireland (2009-2020).

8.1.6 Transport Strategy for the Greater Dublin Area 2022-2042



The National Transport Authority has prepared the Transport Strategy for the Greater Dublin Area 2022-2042, which replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016.

The Vision of this strategy is for the Greater Dublin Area to be a sustainable, well-connected, inclusive city-region with a good quality of life for all by 2042.

The Strategy includes four overarching objectives to achieve the vision, which are as follows:

- An enhanced natural and built environment
- Connected communities and better quality of life
- Strong sustainable economy

- An inclusive transport system

The Strategy sets out measures to achieve the vision and objectives for the GDA. These include creating a better environment and meeting our environmental obligations by reducing car dependency and increasing more sustainable transport options (walking, cycling, increasing walking & public transport use etc.), enhancing the health and quality of life of our society by improved connectivity and delivering safe and integrated transport options, supporting sustainable economic activity and growth, and delivering a high quality, equitable and accessible transport system for all.

We wish to highlight that the current proposal for residential development provides a slight reduction in car parking spaces providing a total of 226 no. car parking spaces. However, this can be achieved as a direct result of the proximity to public transport, pedestrian and cycle connections, employment centres and local services and facilities.

We submit that the proposal for residential development at this location is supportive of the objectives of the Transport Strategy for the Greater Dublin Area 2022-2042.

9 STATEMENT OF CONSISTENCY - SECTION 28 MINISTERIAL GUIDELINES

Each of the relevant strategic policy documents are now considered below and their relevance to the subject site and the developments compliance with same, is assessed in detail.

9.1 Sustainable Residential Development & Compact Settlement Guidelines for Planning Authorities (2024)



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

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

Section 3.3 identifies settlements, area types and density ranges for cities and metropolitan (MASP) areas. It's noted that the strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

9.1.1 Areas and Density Range

Section 3.3.1 of the *Guidelines* reviews what are termed 'settlements, area types and density ranges' for various site locations. In terms of categorisation, Table 3.1 of the *Guidelines* outlines density ranges for Dublin. The ranges are broken down into 'City -Centre'; 'City - Urban Neighbourhoods'; 'City - Suburban/Urban Extension'; 'Metropolitan Town'; and 'Metropolitan Village'.

In terms of categorisation, it would be our opinion that the subject site would fall under the definition of **'City - Suburban/Urban Extension'** which is defined in the guidelines as follows:

"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range ***40 dph to 80 dph (net)*** *shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)."*

Residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations like the subject site. The proposal on this site of 3.83 ha has to cope with a challenging site layout; and the requirement to protect adjacent levels of residential amenity as well as its location in a transitional area. Therefore, a density of 59.22 units per hectare is justified for the subject site.

These guidelines note that the density ranges should be considered and refined based on considerations of proximity and accessibility to services and local character and amenity of the area. We have included these considerations below for the convenience of the Planning Authority.

Consideration of Proximity and Accessibility to Services

It's noted that the site **falls under 'Peripheral', considering there are no existing or planned high frequency (i.e. 10-minute peak hour frequency) urban bus services within 500-1,000 metre (i.e. 10–12-minute walk). There is also no reasonable frequent (minimum 15-minute peak hour frequency) urban bus services within 500 metres (i.e. 6 minute walk) of the site.**

Peripheral - Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

As previously stated, the local bus services 44B & 114 operate during peak hours and every 30 minutes respectively and provide connections to nearby urban centres. Neither bus route currently provides connections to the city centre. It is noted that the BusConnects plan for the area includes the introduction of bus services 86, 87, 88 and L33. Although these services will provide connections to the city centre, they are not expected to be "high frequency". The Blackglen site is also within 1900m (27 min walk) of the Glencairn Luas stop, which is in excess of 900 metres required for the site to be considered an 'intermediate location'.

The current proposal delivers a gross residential density of 59.22 units per ha (based on a full development site area of 3.83ha and development proposal of 192 units), which aligns with requirements.

Considerations of Local Character and Amenity

These guidelines note that new developments should respond to the receiving environment in a positive way and should not result in a significant negative impact on the character including historic character, amenity or the natural environment.

As previously stated in this report, the Planning Authority recommended that the scheme be reduced in height to a maximum of 4 storeys from the previously proposed 6 storeys. In the wider area there are examples of high-density development a similar distance from neighbourhood centres and from the M50, and at similar elevation to the site (e.g., Clon Brugh, Parkview and Belarmine). The main difference between these developments and the site is their position adjacent to the Enniskerry Road. Although, the Blackglen Road Improvement Scheme now results in the road being of urban character (as a streetscape) and capacity, facilitating pedestrian and cycle movement and the use of public transport, tying the adjacent lands into the urban area. The site context will then be similar to that of the aforementioned developments.

9.1.2 Separation Distances (SPPR 1)

It is submitted that minimum separation distances of 16 m are followed and exceeded, with the lowest separation distance being 19m between two proposed duplexes (C1) and the semi-detached houses (D2) towards the west of the site, and the highest being 67.9m between one proposed semi-detached unit (D2) and an existing dwelling south/south-west of the subject site. Distances have been determined based on considerations of privacy and amenity, informed by the layout, design and site characteristics of the subject development.

9.1.3 Private Open Space for Houses (SPPR 2)

Table 10 outlines the Guidelines minimum private open space standards, which shall be applied, considering all dwelling houses will have access to private rear gardens. All private rear gardens comply with the new 'Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities' at 40.5 – 95.8 sqm.

SPPR 2 - Minimum Private Open Space Standards for Houses		
House	**Minimum Private Open Space**	**Max Semi-Private (in lieu)**
1 bed house	20 sq.m	10 sq.m
2 bed house	30 sq.m	15 sq.m
3 bed house	40 sq.m	20 sq.m
4 bed + house	50 sq.m	25 sq.m

Table 5 – SPPR 2 – Minimum Private Open Space Standards for Houses

Apartments and Duplex units

Table 6 below outlines the minimum floor area for private amenity space for apartment and duplex units, which shall be applied, considering private open space ranges from 5.4-88.3sqm for the apartments and duplexes proposed.

Minimum floor area for private amenity space	
Studio	4 sq.m
One bedroom	5 sq.m
Two bedrooms (3 person)	6 sq.m
Two bedrooms (4 person)	7 sq.m
Three bedrooms	9 sq.m

Table 6 – Minimum floor area for private amenity space

9.1.4 Public Open Space

Policy and objective 5.1 – Public Open Space states that new residential development shall provide public open space of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.

As previously mentioned, the proposal provides for 22.27% of Public Open Space. This equates to a total of 8, 686.56 sqm, which includes the following:

- Natural Area for Play (412.79 sqm);
- Fitness Area (54.84 sqm); and
- Dog Park (126.98).

9.1.5 Car Parking – Quantum, Form and Location (SPPR 3)

It is a specific planning policy requirement of these Guidelines that "intermediate and peripheral locations", such as the subject site, shall have a maximum rate of 2 no. spaces per dwelling for car parking provision.

It's noted that 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.

We note that the proposal shall provide a slight reduction, with a total proposed provision of 226 no. spaces. This includes 198 no. long-stay spaces for residential, 18 no. spaces for visitors and 10 no. spaces for the creche. It also includes 12no. accessible spaces at a ratio of 5%.

It should also be noted that this provision has been developed to promote sustainable travel, is in line with the requirements of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, the Sustainable Urban Housing: Design Standards for New Apartments July 2023 and the Dun Laoghaire Rathdown Development 2022 – 2028.

Since the main component of this development consists of apartments, it is proposed to make use of the requirements of the Sustainable Urban Housing: Design Standards for New Apartments (July 2023) guidelines. However, this is only applicable to apartments which means that the remainder of the development's car parking requirements should be based on the development plan.

This quantum is below the maximum allowable provision as per the Compact Settlement Guidelines and thus conforms to the requirement of substantially reducing the provision. This can be further motivated by the provision being below the maximum of 295 no. spaces prescribed in the development plan.

It is submitted that this provision is wholly realistic and appropriate for the type and location of the development due to the following reasons:

- While the development is not within in prescribed 1,500m distance from high-capacity urban public transport (LUAS) to be classified as an intermediate urban location, it is within 1,900m which is just outside of the range and will still provide good access to this service and promote rail usage as a viable alternative mode to private car use;
- There are a number of highly accessible bus stops along Blackglen Road which provide connections to the following nearby urban centres. Dublin Bus 44b provides a connection between the Dundrum Luas Station, Dundrum, Sandyford and Glencullen. Go Ahead service 114 provides access to Blackrock Station, Stillorgan Road, Ravenscourt Park and Rockview. These accessible bus services will promote bus use as a viable alternative to private car use, further shifting the modal share to sustainable travel;
- The Blackglen Road Improvement Scheme has provided high-quality walking and cycling infrastructure on the development's frontage, which ties in with the wider network, further increasing accessibility.

The quantum of car parking proposed at the development is further expanded upon and motivated in the Traffic and Transportation Assessment enclosed herewith as part of this planning submission.

In addition to the above, the development will comply with all DLR standards for bicycle parking, DAC spaces, motorbike spaces, and EV spaces.

9.1.6 Bicycle Parking and Storage (SPPR 4)

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.

(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

The proposal provides for a total of 484 no. bicycle parking spaces (446 no. long-stay and 38 no. short-stay), which equates to a ratio of 2.52 parking spaces, which accords with the requirements set out above.

9.1.7 Daylight

The Guidelines state that the provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high-quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties.

As previously noted in this report, the design team have reduced the height of the initial proposal under ABP REF. 314459-22 from a maximum of 6 storeys to 2-5 storeys and have omitted apartment blocks C1, C2 and C3, replacing them with duplexes (C1, C2, C2A) and houses (D1 & D2).

Reducing height and omitting the previously proposed apartment blocks considers the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, particularly considering the **design team has made every effort to avoid single and north facing units in the proposed apartment block's, which has resulted in 80.7% dual aspect apartment units, an increase from 46%, which was below the 50% threshold.**

We also confirm that OCSC Consulting Engineers have completed a detailed analysis in terms of daylight, sunlight and overshadowing as these matters relate to the scheme and surrounding development:

- For internal daylight, the analysis confirmed that the majority of spaces not only meet but greatly exceed the recommendations outlined within the BRE Guidelines 2011 guidance - achieving a 93% compliance rate with the Second Edition (2011) methodology. In relation to the Third Edition (2022) methodology, 95% for Criterion 1 and 94% for Criterion 2 of proposed development has been achieved.
- Sunlight analysis showed excellent levels of amenity sunlight will be achieved within the proposed development. At least 2 hours of sunlight are achieved on March 21st on the majority of the amenity spaces provided, both with and without the amended scheme - thus complying with BRE Guidelines.
- The overshadowing images have also shown that there is a negligible impact to the surrounding units when the proposed schemes are assessed on the 21st March test day.

Following the incorporation of the proposed modifications, the VSC at all the windows assessed within the surrounding properties, when analysing the VSC of the proposed scenario a daylight impact will not be perceived for sensitive receptor as the VSC remains greater than 80% of its former value. The analysis confirms that proposed development, on the adjacent buildings has not perceived any impacts.

9.2 Guidelines for Planning Authorities on Childcare Facilities (2001)



The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: "*Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities*."

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Childcare (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and
- Intended hours of operation.

Assessment

The recommendation for new housing developments is the provision of 1 facility providing for a minimum 20 childcare places per approximately 75 dwellings. The relevant guidelines state that if it is assumed 50% of units can be assumed to require childcare in a new housing area of 75 dwellings, approximately 35 will need childcare. However, one-bedroom units are not considered to contribute to the childcare provision under the new apartment's guidelines. This may also apply in part to the provision of 2-bedroom units. With regard to the proposed development the threshold for provision for facilities should be established having regard to the scale and unit mix of the proposed development

The following indicative summary mix is identified for the total 192 proposed units (including apartments, duplexes & houses):

- Total 1 Bed units: 33 no (17.2 %)
- Total 2 Bed units: 84 no (43.8 %)
- Total 3 Bed units: 61 no (31.8 %)
- Total 4 Bed units: 14 no (7.3%)

It is noted that the 2, 3 and 4 bed units should only be considered as contributing to a requirement for childcare in accordance with the provisions of the statutory planning context. **A total of 159 units (excluding 1 bed units) therefore have the potential to require childcare facilities**. This is the upper most demand in terms of requirements for childcare given that not all 2 bed units will require childcare. Notwithstanding this, we note the following calculations based on these uppermost requirements.

- 159 units & 1 facility required for every 75 units = 159/75 = 2.1
- 20 childcare spaces required for every 75 units = 20 x 2.1 = 42.4

Based on the above calculations, **42.4 no. spaces** are required to address the requirements of the proposed development. The subject proposal exceeds this requirement and provides a total of 62 childcare places within the childcare facility. It is our view that this demand can be catered for within the proposed large creche area, equating to 378.2 sqm. The Creche facility has been designed to have capacity for the childcare needs of the proposed development and is located at the entrance of the development, to facilitate ease of access. The creche is also afforded an appropriate outdoor play area (170 sqm) and car parking to serve staff and drop off.

According to the Section 12.4.5.3 of the Development Plan, a minimum of 4% of car parking spaces provided shall be reserved for parent and child parking for childcare uses. Table 12.4 'Car Parking Zones and Standards' also refers to childcare parking provision, which is based on the Gross Floor Area of 1 space per 40 (401 sqm/40 = 10). The requirement for the proposed Childcare Facility is 10 car parking spaces, which will be provided for the proposed creche.

We welcome the views of the Planning Authority on this element of the proposal and initial assessment detailed above.

The current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Apartment Guidelines of 2018.

9.3 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

We refer to the enclosed Site Specific Flood Risk Assessment, prepared by OSCS Engineering for full details on the assessment carried out in line with the above guidelines. The key conclusions of this document are as follows:

The assessment has been carried out in full compliance with the requirements of "The Planning System & Flood Risk Management Guidelines" published by the Department of the Environment, Heritage and Local Government in November 2009.

As detailed within the previous sections of this report, the proposed buildings for this development are located within Flood Zone C, except for the southern site boundary which aligns with flood zone A. This, however, appears to be confined to the Carrickmines stream channel. It should be noted there will be no alterations of existing levels within 15m of the channel in that area (as shown in the area cross section in Appendix F). In addition, there is also a 4m rise in elevation from the stream bed to where the existing grades will be altered.

Therefore, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flooding in the proposed development.

9.4 Guidance on Appropriate Assessment for Planning Authorities (2009)

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 "European Communities (Natural Habitats) Regulations (1997)" any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

We confirm that an AA Screening Report and Ecological Impact Assessment forms part of this LRD application.

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



'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities July 2023' are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

These guidelines in their current format were originally issued in 2018, as an update of the Sustainable Urban Housing: Design Standards for New Apartments guidelines published in 2015. The 2020 update related to 'Shared Accommodation'/'Co-living' as detailed in Section 5.0. These 2022 Guidelines are issued

as a further technical update in relation to 'Build-To-Rent' accommodation and to update some other references, where necessary.

The Design Standards for new Apartment's detail 3 no. locations where apartment developments are generally suitable. These are defined as:

1. 'Central and / or Accessible Urban Locations
2. Intermediate Urban Locations
3. Peripheral and / or Less Accessible Urban Locations.'

The development is classed as being in an 'Peripheral and / or Less Accessible Urban Locations' within the guidelines which are defined as the following in section 2.4:

"Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages.*

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors."

Existing public transport currently available along Blackglen Road is not considered frequent, including the upgrades proposed as part of the proposed BusConnects upgrades. However, the local bus services 44B & 114 operate during peak hours and every 30 minutes respectively and provide connections to nearby urban centres. Neither bus route currently provides connections to the city centre. Although, it is noted that the BusConnects plan for the area includes the introduction of bus services 86, 87, 88 and L33, which will provide connections to the city centre. The Blackglen site is also within 1900m (27 min walk) of the Glencairn Luas stop, which is in excess of 900 metres required for the site to be considered an 'intermediate urban location'.

Specific Planning Policy Requirements

The current proposal provides for 192 no. residential units and this statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1

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).

Applicant Response to SPPR1

The proposed residential mix provides for 192 no. units as follows:

- 33 no. 1 bed units (17.2%)
- 84 no. 2 bed units (43.8%)
- 61 no. 3 bed units (31.8%)
- 14 no. 4 bed units (7.3%)

We submit the proposal is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units.

Specific Planning Policy Requirement 2

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;***
>
> ***All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.***

Applicant Response to SPPR2

We note that the subject site area exceeds 0.25ha. SPPR 2 does not apply in this instance.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- ***Studio apartment (1 persons) 37 sqm***
- ***1-bedroom apartment (2 persons) 45 sqm***
- ***2-bedroom apartment (4 persons) 73 sqm***
- ***3-bedroom apartment (5 persons) 90 sqm***

Applicant Response to SPPR3

The proposed apartment and duplexes comply with the minimum apartment floor areas as follows:

- *1-bedroom apartment (2 persons)*: 47.1-50.4 sqm
- 2-bedroom apartment (3 persons): 67.3 sqm
- *2-bedroom apartment (4 persons):* 74.9 - 88 sqm.
- *3-bedroom apartment/duplex (5 persons):* 95.4 sqm - 116.4 sqm
- 4-bedroom duplex (7 persons): 145.7sqm

For further information in this regard, please refer to the enclosed architectural drawings and 'Housing Quality Assessment' schedule prepared by OMP Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement 4

"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."

Applicant Response to SPPR4

The development in this instance is located in a suburban location on appropriately zoned lands in a highly accessible location along Blackglen Road. The proposed development delivers 80.7% dual aspect units. We note specifically that a total of 155 of the 192 no. units proposed deliver dual aspect.

Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines.

Specific Planning Policy Requirements 5

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

Applicant Response to SPPR5

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 2.7m.

We note the Guidelines state the following:

"Building Regulations Technical Document F deals with Ventilation. It provides guidance on ceiling height in habitable rooms. The suggested minimum floor to ceiling height, consistent with good room design, the use of standard materials and good building practice is ***generally 2.4m****".*

Given this, the proposed development complies with the floor to ceiling height requirements of the Apartment Guidelines.

Specific Planning Policy Requirements 6

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

Applicant Response to SPPR6

SPPR 8 (v) is the predominant policy on the number of apartments per core. However, we can confirm that the number of apartments per floor per core will not exceed 12 no. in any block. To this end, it is noted that that the maximum number of units per floor core proposed in this development is 9 no. units per floor core.

In addition to the Specific Planning Policy Requirements noted above the 'Guidelines' sets out additional requirement for the following items:

Internal Storage

Unit Type	Min. Storage Requirements	Proposed
1-bed	3 sqm	3 sqm – 3.5 sqm
2-bed (3 person)	5 sqm	5.5 sqm
2-bed (4 persons)	6 sqm	6 sqm – 8 sqm
3 or more bedrooms	9 sqm	9 sqm – 12.1 sqm

Table 7 - Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in excess of the minimum, as shown in the Housing Quality Assessment prepared by OMP Architects.

Unit Type	Min. Private Open Space Req.	Proposed
1-bed	5 sqm	5.4 sqm – 52 sqm
2-bed (3 person)	6 sqm	6.2 sqm
2-bed (4 persons)	7 sqm	7 sqm – 73.7 sqm
3-bed	9 sqm	9.2 sqm - 88.3 sqm

Table 8 - Private Amenity Space Requirement and Provision

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward.

All balconies will also meet or exceed the minimum depth requirement of 1.5 m.

Communal Amenity Space

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	33 x 5 = 165 sqm
2-bed (3 person)	6 sqm	16 x 6 =96 sqm
2-bed (4 persons)	7 sqm	68 x 7 = 476 sqm
3-bed	9 sqm	47 x 9 = 423 sqm (excludes 3 bed houses) & 14 (4-bed duplexes) x 9 =126 Total – 549 sqm
Total		**1,286 sqm**

Table 9 - Communal Amenity Space Requirement and Provision

The current proposal exceeds the requirements and provides for a total of 2,168 sqm of communal open space at provided ground level, which is over and above the 1,286 sqm required.

Childcare Facilities

The 2022 apartment guidelines outline the requirement for the provision of one child-care facility for every 75 dwelling units, subject to the proposed development mix and existing local childcare facilities as follows:

> *'4.7: Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progress, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.'*

The Apartment Guidelines (2022) also set out that studio and one-bedroom units should be discounted when calculating demand for childcare that would be generated by the proposed residential development. The guidelines note that this approach may also apply in part to units with two or more bedrooms.

Assessment

The recommendation for new housing developments is the provision of 1 facility providing for a minimum 20 childcare places per approximately 75 dwellings. The relevant guidelines state that if it is assumed 50% of units can be assumed to require childcare in a new housing area of 75 dwellings, approximately 35 will need childcare. However, one-bedroom units are not considered to contribute to the childcare provision under the new apartment's guidelines. This may also apply in part to the provision of 2-bedroom units.

With regard to the proposed development the threshold for provision for facilities should be established having regard to:

- Scale and unit mix of the proposed development

The following indicative summary mix is identified for the total 192 proposed units (including apartments, duplexes & houses):

- Total 1 Bed units: 33 no (17.2 %)
- Total 2 Bed units: 84 no (43.8 %)
- Total 3 Bed units: 61 no (31.8 %)
- Total 4 Bed units: 14 no (7.3%)

It is noted that the 2, 3 and 4 bed units should only be considered as contributing to a requirement for childcare in accordance with the provisions of the statutory planning context. **A total of 159 units (excluding 1 bed units) therefore have the potential to require childcare facilities**. This is the upper most demand in terms of requirements for childcare given that not all 2 bed units will require childcare.

Notwithstanding this, we note the following calculations based on these uppermost requirements.

- 159 units & 1 facility required for every 75 units = 159/75 = 2.1
- 20 childcare spaces required for every 75 units = 20 x 2.1 = 42.4

Based on the above calculations, **42.4 no. spaces** are required to address the requirements of the proposed development. The subject proposal exceeds this requirement and provides a total of 62 childcare places within the childcare facility. It is our view that this demand can be catered for within the proposed large creche area, equating to 378.2 sqm. The Creche facility has been designed to have capacity for the childcare needs of the proposed development and is located at the entrance of the development, to facilitate ease of access. The creche is also afforded an appropriate outdoor play area (170 sqm) and car parking to serve staff and drop off.

According to the Section 12.4.5.3 of the Development Plan, a minimum of 4% of car parking spaces provided shall be reserved for parent and child parking for childcare uses. Table 12.4 'Car Parking Zones and Standards' also refers to childcare parking provision, which is based on the Gross Floor Area of 1 space per 40 (381.9 sqm/40 = 9.54). The requirement for the proposed Childcare Facility is 10 car parking spaces, which is to be provided for the proposed creche.

We welcome the views of the Planning Authority on this element of the proposal and initial assessment detailed above.

We submit to the Board that the proposal is consistent with the overall principles of the Sustainable Urban Housing: Design Standards for New Apartments (2022)

9.6 Urban Development and Building Height Guidelines (2018)



The publication of the **'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)'** is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

"Accordingly, where SPPRs are stated in this document, ***they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.***

Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.

The Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

"In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

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

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section 'Development Management Criteria'.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority that the proposed development satisfies criteria. The relevant criteria, followed by an applicant response is set out below to clearly set out for the Planning Authority to demonstrate that the current proposal respects the outlined Development Management Criteria.

At the scale of the relevant city / town	
Assessment Criteria	**Response**
"The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is served by numerous modes of public transport including both Luas and bus routes. The northern boundary of the site is located approximately 120m (2-minute walk, 1-minute cycle) from the nearest bus stop along Blackglen Road, which provides connections during peak hours, every 30 minutes to nearby urban centres, (bus routes no. 44b & 114). Neither bus route provides connections to the city centre, however, the BusConnects plan for the area shall provide an additional 4 no. bus services (86, 87, 88 & L33), that will provide connections to the city centre. The site is also located c. 1.9km (27-minute walking distance & 9-minute cycle) from the Glencairn Luas stop. The Blackglen Road Improvement Scheme has also recently been completed, and it is expected that the scheme will facilitate a Quality Bus Corridor, which may support additional bus services available to future residents, in line with BusConnects.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area,	The proposal is not located within an architecturally sensitive area. However, careful consideration has been given to the successful

having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	integration of the scheme into the existing character and topography of the site and area. The design strategy from the outset took into consideration the site's locational context within a transitional zone where peri-urban landscape of the foothills of the Dublin Mountains within the historic Barnacullia Landscape Area (LCA). The proposal would result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality particularly because the design of the scheme has regard to the protection of the historic Barnacullia Landscape Character Area.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape."	The proposed development would not reduce the visual amenity of the surrounding area. Careful consideration has been given to the existing surrounding area and appropriate set back distances have been maintained to not reduce the level of amenity experienced by surrounding dwellings. A variety of unit types and heights are provided and consider the level changes across the development site offering a variety in scale and form while also providing an appropriate density for the site given its location in a transitional area.
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to the natural and built environment of the Barnacullia Landscape Character in an appropriate manner. Careful consideration has been given to the proposal regarding how it addresses this sensitive location with particular attention given to integrating the scheme into and enhancing the character of the surrounding area. The scheme refers to the sites steep sloping terrain, which results in houses being places both above and below the road level, particularly along the Ballyedmonduff/Barnacullia Road axis. The initial concept studies explored the similar relationship between surrounding buildings and the sloping landscape topography, which resulted in the emerging disposition of the proposed apartment blocks on site to evolve as a series of clustered buildings referencing the Barnacullia settlement pattern. The high-quality design submitted provides an appropriate development which will provide a precedent for development on nearby similar sites. The development aims to deliver a new high quality residential development catering to the demand for new units as outlined in national policy documents on a currently underutilised site.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that a monolithic appearance is avoided. Different materials, and fenestration as well as changes in massing across the site will break up the uniform appearance of the site and create visual interest. The changes in height from 2 to 5 storeys on the site creates a unique townscape, avoiding the feel of a monolithic one-dimensional development. We refer to the Architectural Design Statement prepared by OMP Architects enclosed herewith for further details.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).	The Carrickmines/Shanganagh Stream is located along the south-eastern boundary of the site. The development is set back approximately 25m from the Carrickmines Stream. A full site-specific flood risk assessment has been prepared by OCSC Consulting Engineers addressing the potential for Flood Risk on the lands. The assessment has concluded that the proposed buildings for this development are located within Flood Zone C, except for the southern site boundary which aligns with flood zone A. This, however, appears to be confined to the Carrickmines stream channel. It should be noted there will be no alterations of existing levels within 15m of the channel in that area (as shown in the area cross section in Appendix F of the assessment). In addition, there

	is also a 4m rise in elevation from the stream bed to where the existing grades will be altered. Therefore, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flooding in the proposed development.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The high-quality design proposed will ensure that the development will be legible and attractive when viewed from the wider area. Internally, the site provides pedestrian and cyclist linkages which integrates the development.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood."	The appropriate mix of unit types and sizes will be incorporated into the proposed development to contribute to a currently limited market for this type of housing. The mix of 1, 2, 3 and 4-bedroom apartments/duplexes and 3-bedroom houses provides variety and options within a single development for future residents.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Architectural Design Statement by OMP Architects. The scheme design, particularly the orientation of the housing units was carefully considered to minimise the potential for overlooking and overshadowing of each other.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'. **Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.**	We confirm that a Daylight and Sunlight Assessment has been completed by OCSC and accompanies this report. The analysis has been performed on ground floor for all blocks and on the first floor for most of the blocks. The analysis confirms that overall, excellent levels of internal daylight achieved using the old method for daylight (Second Edition). The results show a 93% compliance rate has been achieved across the assessed development when compared against the older daylight standard. Also, 95% for criterion 1 and 94% for criterion 2 of the proposed development comply with internal daylight levels when each space was assessed under the newer Third Edition standard.
Site Specific Assessment	
Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A microclimate assessment is not deemed necessary in the case of the proposed development given the relatively low build height proposed, in addition to the undulating topography of the site, which allows for gradual increases in height to transition between 2 to 4 storeys with a stepped approach providing a maximum of 5 storeys.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	As outlined in both the Screening Report for Appropriate Assessment and the Ecological Impact Statement prepared by Enviroguide Consulting, there is no significant ex-situ feeding/roosting/staging habitat on the Site for any SCI species of wintering birds listed for this European site, or those located to the east along the Dublin coastline. It is considered that, provided the mitigation measures proposed are carried out in full, there will be no likely significant adverse effects on any valued habitats, designated sites or individual or group of species as a result of the Proposed Development. The inclusion of 'rocket' bat boxes and swift bricks in the design of the

	Proposed Development will also provide novel nesting habitat for bats and swifts at the Site. A Wildlife Refuge and Biodiversity Management Plan has been prepared for the Site (Enviroguide, 2024) which details the creation and management of the habitats and biodiversity enhancement features proposed within the wildlife refuge and the wider Site.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	We confirm that a Telecommunications Report, prepared by ISM, which concludes based on their findings that the proposal being made by the Applicant within its submission to the Planning Authority allows for the retention of important Telecommunication Channels, such as Microwave links, and therefore satisfies both the criteria of Section 3.2 of the Building Height Guidelines (2018) and Appendix 5, Section 1.4.2 of the Dun Laoghaire-Rathdown County Development Plan 2022-2028.
An assessment that the proposal maintains safe air navigation.	Given the development is removed from any airports or air strips this report is not required.
An urban design statement including, as appropriate, impact on the historic built environment	An Architectural Design Statement has been prepared by OMP Architects and is enclosed as part of the submitted application documentation. The development proposes no potential impact on any nearby protected structures, considering there are no Protected Structures onsite, and the site is not located within an Architectural Conservation Area.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	We confirm that an Appropriate Assessment Screening Report, Environmental Impact Assessment and an Ecological Impact Assessment, prepared by Enviroguide Consulting accompany this LRD Application.

Table 10 - Development Management Criteria

In consideration of above, the current proposal for 192 no. apartment units can be positively considered on this site by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Guidelines that being one proximate to public transport and a variety of services.

We submit that the proposal is consistent with the Urban Development and Building Height Guideline for Planning Authorities (2018)

10 STATUTORY PLANNING CONTEXT

10.1 Dún Laoghaire-Rathdown County Development Plan 2022-2028

The Dún Laoghaire-Rathdown County Development Plan 2022-2028 is the relevant statutory planning context governing the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions or alterations made during the lifetime of the permission.

It is submitted that it is the design team's full intention for the subject scheme to be in compliance with the site zoning, key development objectives and key development standards.

The subject site is now put forward in accordance with this Development Plan policy context.

10.1.1 Core Strategy

The Core Strategy of this Plan aims to articulate a medium to longer terms quantitatively based strategy for the spatial development of the County and in so doing to demonstrate that the Plan and its objectives are consistent with national and regional development objectives set out in the NPF and RSES.

The central focus of the Core Strategy *"is on residential development and in ensuring that there is acceptable equilibrium between the supply of zoned, serviced lands for the projected demand for new housing, over the lifetime of the plan."*

10.1.2 Housing

Population and Housing Trends

DLR has experienced a significant reversal in population growth trends from a County that was experiencing a period of population stagnation through the noughties, to a County that has experienced consistent and strong population growth over the last 10 to 15 years. The 2016 Census records indicate that DLR has a population of c.218,000 people which comprises an increase of c. 24,000 people over the two intercensal periods from 2006 to 2016. The average annual population projections set out in the table below.

	2016	2026 (Low to High)	2028 (Low to High)	Total Population Growth 2016-2028	Average Annual Pop Growth 2016-2028
Dún Laoghaire-Rathdown	218,000	246,750 – 252,375[1]	250,550 – 258,375 [2]	32,550 – 40,375	2,713 – 3,365

Figure 23 – DLR Core Strategy – Population Projections

There has been a significant increase in housing completion levels from that experienced during the financial and property crash with housing completion levels now averaging c. 1,200 units per annum. Looking at the most recent intercensal period between 2011 and 2016, population increased by 11,757 people while housing stock only increased by 1,066 units. This represents an enormous undersupply in housing units. Therefore, this subject proposal would provide an increase in 192 no. new housing units for the population of the County.



Figure 24 – Housing Delivery v Population Growth 2011-2016

The table below highlights the requirement of 20,669 no. additional residential units up to the year 2028.

	2016	2028 – RSES High Growth Scenario
Population	218,000	258,375
Increase in Population	N/A	40,375
Total Housing Stock	86,962	111,944
Housing Target (2016-2028)	N/A	24,982
Minus CSO Housing Completions (Q2 2016 – Q4 2019)	N/A	4,313
Housing Target (2020-2028)	N/A	20,669

Figure 25 – Core Strategy Housing Target

Figure 26 below highlights the Housing Land Availability Study. The subject site is located adjacent to the area highlighted being Ballyogan lands with a capacity to provide for 4,147 units within the lifetime of the Plan.

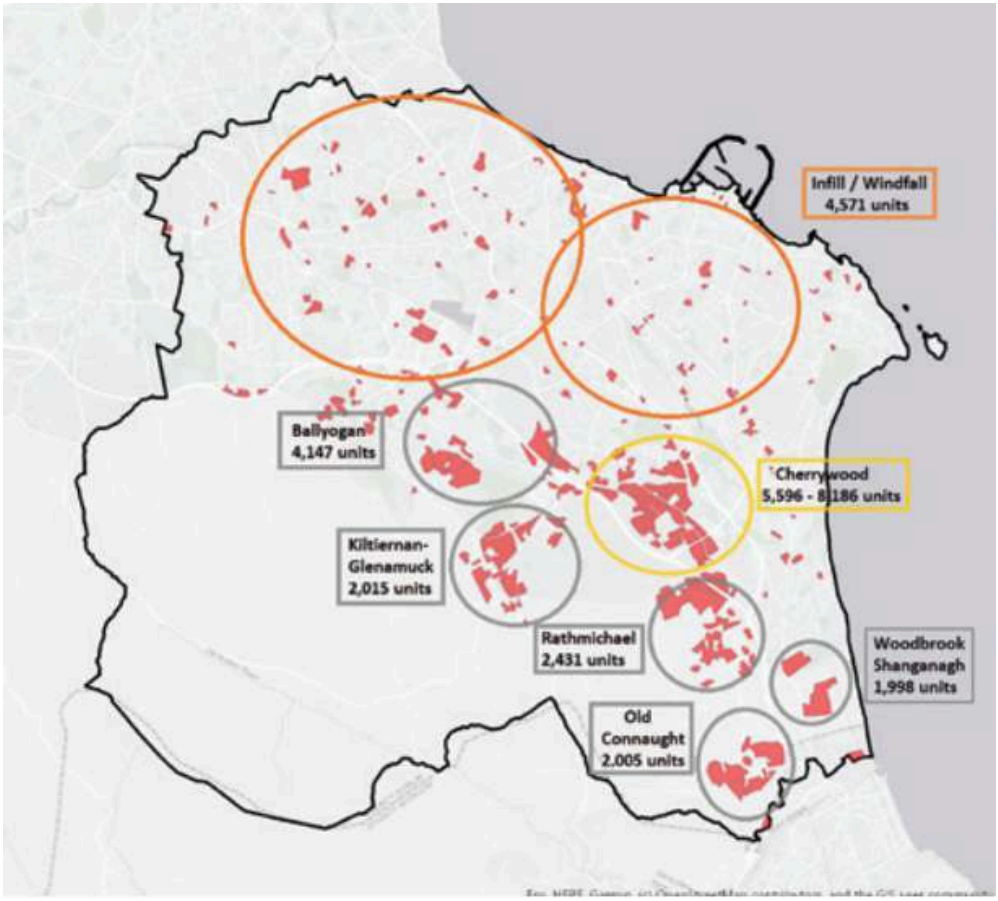


Figure 26 – Residential Development Capacity Audit – Aggregate Data

The subject proposal is consistent with the Core Strategy of the Development Plan by providing 192 no. new residential units on serviced lands proximate to an established urban area.

10.1.3 Zoning

The subject site is zoned *'A' with* an objective *'to provide residential development and improve residential amenity while protecting the existing residential amenities.'*

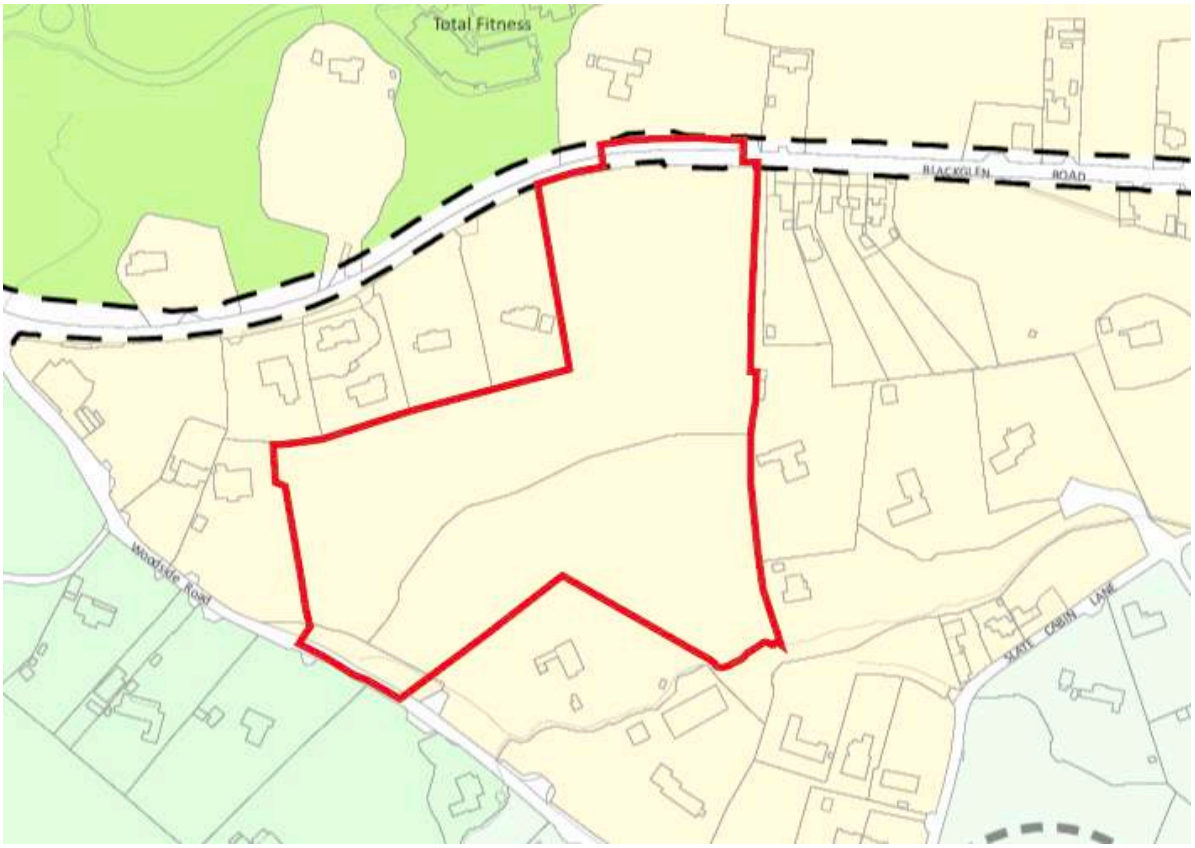


Figure 27 – DLR Development Plan 2022-2028 Zoning Map 5 Extract with subject site outlined in Red

The uses permitted in principle under this zoning objective are:

> *"Assisted Living Accommodation, Community Facility,* ***Childcare Service****, Doctor/Dentist etc., Education, Health Centre/ Healthcare Facility, Open Space, Public Services,* ***Residential****, Residential Institution, Travellers Accommodation."*

The uses open for consideration under this zoning objective are:

> *"Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark, Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry, Offices less than 200sq.m., Offices in excess of 200 sq.m., Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery."*

The subject site (zoned Objective A) is located proximate to an area of zoned open space (Zoning Objective F) to the Northeast. It may be considered that the site is therefore situated in a Transitional Zone. The following provisions of the Development Plan as they relate to the site are set out below:

Section 13.1.2 of the Development Plan sets out that:

> *"The maps of the County Development Plan show the boundaries between zones. While the zoning objectives and development management standards indicate the different uses and densities, etc. permitted in each zone, it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments which would be detrimental to the amenities of the more environmentally sensitive zone. For instance, in zones abutting 'residential areas' or abutting residential development within mixed-use zones, particular attention must be paid to the use, scale and density of development proposals in order to protect the amenities of these residential properties."*

In consideration of the above provision, we are of the view that the current proposal for residential development along the shared boundary is an appropriate land use with no perceived negative impact on the area of open space to the northeast.

All considered, the current proposal is considered a positive contribution to this transitional zone.

The site is also subject to Specific Local Objective SLO 65 – *"to prepare a Local Area Plan for Sallynoggin".* We note that the referenced LAP has not yet been adopted or prepared.

10.1.4 Planning Policy

This section of the report reviews the compliance of the scheme with Development Plan policy as per the table set out below.

Policy Ref.	Policy	Applicant Response
CS11	***"It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES)"***	The proposed development is in line with this policy as it provides 192 no. new residential units within the Dublin City and Suburbs geographic boundary.
PHP6	***"It is a Policy Objective to:*** • ***Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.*** • ***Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage."***	Community facilities will be provided in the form of a childcare facility. This facility is considered to be of a high quality and will be accessible to residents and to the wider community where appropriate.
PHP18	***"It is a Policy Objective to:*** • ***Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.*** • ***Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development."***	The overall development provides for a residential density of 59.22 units per ha (reduced from 97.3 units per hectare) based on the substantive development area of 3.83ha, and a proposal for 192 units on a central site. This residential density is considered appropriate to the site given that the scheme has been amended twice. The number of units has previously been reduced from 400 to 360 units under SHD Ref. 314459-22 and reduced again under the current proposal from 360 units to 192 units. The Inspectors report further noted under SHD Ref. 314459- that "densities of less than 50 units per hectare is inappropriate given the large site holding of circa 3.7ha, the residential zoning objective on the lands and other relevant National Planning Policy." The proposed residential development also is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' and 'Irish Design Manual for Urban roads and streets'. The proposed residential development is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', *'Quality Housing for Sustainable Communities'* and 'Irish Design Manual for Urban roads and streets.' This report and accompanying documentation on DMURs set out this compliance in further detail.
PHP20	***"It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments."***	The proposed development will not have significant impacts on the residential amenity of adjacent existing development and will positively contribute to the surrounding area.
PHP29	***It is a Policy Objective to:*** • ***Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.***	To demonstrate compliance with PHP29 and based on the findings of the Housing Strategy and HNDA, planning applications for 50+ residential units with lands located within the neighbourhood will be

	• ***Support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*** • ***Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community.***	required to incorporate a variety and choice of housing units by type and size to meet the differing household need in the County. The proposed provision of residential units shall provide a good mix that reflects existing, and emerging household formation, housing demand patterns and trends identified locally and/or within the County It is therefore submitted that the proposal is appropriate for an ageing population.
PHP30	***"It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'"***	The proposed development is in line with the Housing Strategy as it provides 19 no. social housing units under Part V. The housing provided overall is energy efficient, good mix of good quality housing and is accessible for all. This has been demonstrated in the objective addressed below.
PHP35	***"It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES."***	The proposed development is accessible universally. OMP Architects have included a detailed drawing detail with the drawing pack submitted setting this out.
PHP36	***"It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved."***	The proposed development will contribute positively in enhancing the public realm by establishing a strong street frontage onto Blackglen Road with a public open spaces associated residential amenity uses and creche.
PHP38	***"It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County."***	The design team have sought to maximise security and safety within the proposed development as follows: • Ensuring that all public spaces within the development are overlooked by the surrounding buildings • Providing high levels of glazing in the communal areas of the apartment blocks • Providing high levels of lighting in all communal and parking areas
PHP39	***"It is a Policy Objective to:*** • ***Encourage high quality design of all new development.*** • ***Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF)."***	The design of the proposal is of high-quality and incorporates many elements which contribute to establishing its own context, including a pedestrian dominant internal environment, quality landscaped public and communal open space areas, creche and residential amenity faculties. The current proposal is predominantly 4 storeys with a maximum height proposal of 5 storeys set back due to the sites undulating topography, reduced from a maximum of 6 storeys previously proposed under ABP REF. 314459-22 and is located on a sizable development site proximate to local transport nodes and is considered to retain all levels of existing residential amenity afforded to adjoining properties.
PHP41	***"It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme."***	A Design Statement has been prepared and submitted by OMP Architects detailing how the proposal responds to the design criteria of the 2009 Urban Design Manual is set out in this Statement and Section 9.1 of this Planning Report and Statement of Consistency.

OSR4	***"It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2018)."***	The public open space within this development is of exceptional quality, with accessible and functional open spaces scattered throughout the scheme. Total Open space (approx. 10,854.65 sq. m) is proposed in the form of public open space (approx. 8, 686.56 sq. m), and residential communal open space (approx. 2,168.09 sq. m). Each residential unit is afforded with associated private open space in the form of a garden/terrace/balcony.
OSR13	***"It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people - are facilitated in the public parks and open spaces of Dún Laoghaire – Rathdown."***	Comprehensive landscaping proposals are included for the proposed development including a range of facilities for children of different ages, parents and the elderly. A vibrant and multi-functional communal open space is provided which benefits from safety, free from cars and passive surveillance and can provide a space that offers small children's play area, picnic areas and benches. A series of nature-based play spaces express a new direction in early learning environments and provide a range of diverse and flexible play spaces which lead to tactile experiences and nature play without ever prescribing the use of the areas.
CA17	***"It is a Policy Objective to promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES)."***	Tree planting throughout the scheme has been selected to blend the development into its surrounding environs and create focal points within the development. A mix of specimen trees, multi-stemmed trees coupled with seasonal grasses, ornamental shrubs and pollinator friendly herbaceous planting.

Table 11 - Development Plan Policy Compliance

10.1.5 Landscape Character Assessment & Visual Impact

The subject site is located within the "Barnacullia" Landscape Character Area as defined by Appendix 8 of the County Development Plan. The Assessment notes that *"The area has already absorbed considerable residential development along its main routeways. At present the Enniskerry Road R117 acts as a boundary between urban and rural developments as the land begins to rise steeply to the west of this roadway".*

Within this area, the Council also prepared a Historic Landscape Character Assessment for Barnacullia in 2006. We note that the subject site is located outside the boundary of this Assessment, which ends at Woodside Road. Nevertheless, the design team has reviewed the detail of this Assessment and reflected its principles through the evolution of the landscape scheme and the proposed arrangement for the blocks, in addition to reducing the number of story's proposed and omitting apartment blocks C1, C2 and C3 previously proposed.

It's noted that the site is located in the historic landscape character area of Baranacullia on the lower north western slopes of Three Rock Mountain and Ticknock. As previously stated, this area is defined by the undulating topography which ranges in high from +155m down to our subject site altitude of +135m and levels off to the lowland landscape of Dublin to the south and to Dublin Bay to the east. This highlights that the subject site resides in a transitional zone between the uplands of the Dublin Mountains and the lowlands of the Dublin environs and has developed historically as a transitional/frontier area.

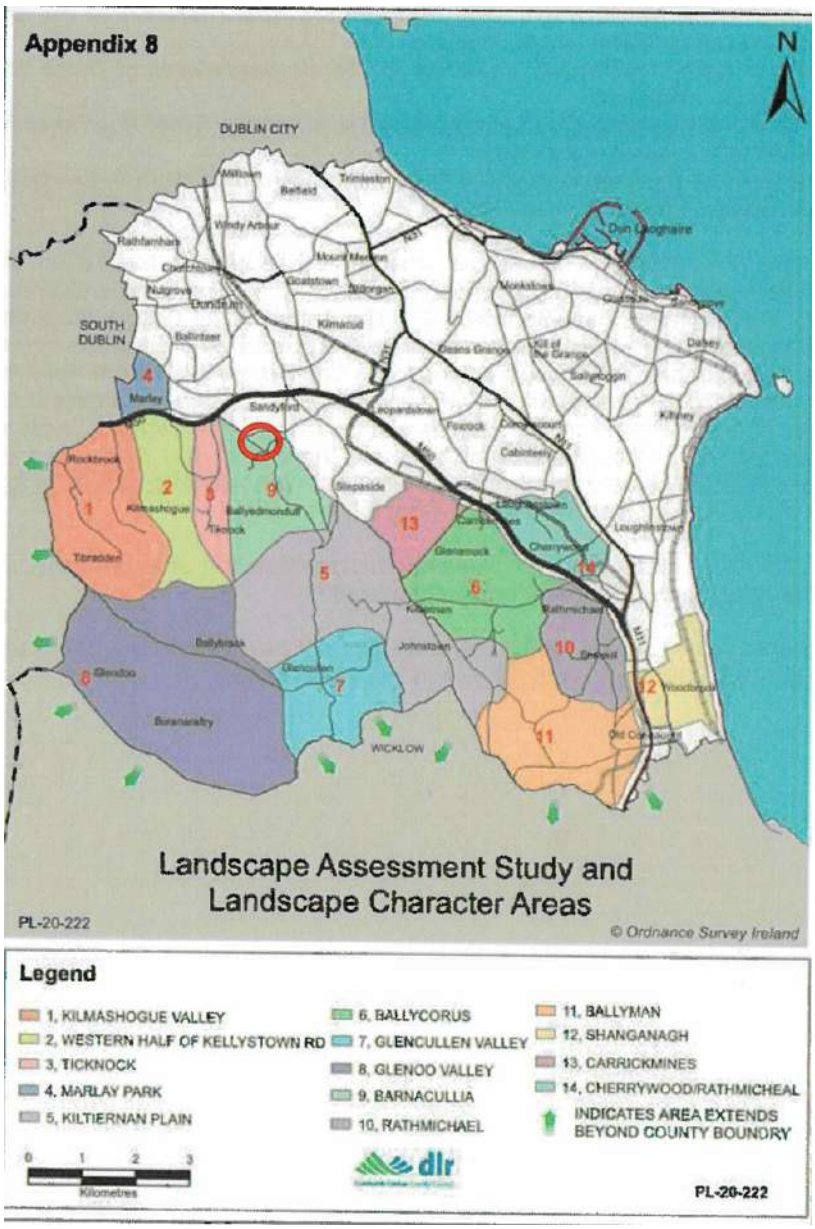


Figure 28 – Extract from LCA Map (Appendix 8 of Development Plan 2022-2028) with the location of the site identified by red circle

As referred to in the landscape design rationale, the site is in a transitional zone ecologically between the lowlands of Fitzsimons Wood and the existing Oak Holly, Birch vegetation therein and the uplands of the Dublin Mountains and the vegetation found beyond. The landscape design of the proposed site aims to accentuate this transition and proposes that the planting scheme will transition mid-way through the site from the lowland Oak, Holly and Birch vegetation to the upland Gorse, Heather and Pine. The change in land use over the years from previously unmanaged areas to agriculture in the 1700's has led to a loss of biodiversity. Mono cultural grassland has not encouraged a rich biodiversity in this area and some areas of heathland have been adopted to provide coniferous forestry while large areas of upland Pine and Heather habitats prevail.

10.1.6 Ecological Network

The subject site is located within the Ticknock to River Dodder Wildlife Corridor and supports the provisions of the DLR Biodiversity Action Plan 2021-2025 (refer to Objective GIB20).

Policy Objective GIB20: Biodiversity Plan
It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021-2025.

Table 12 - Policy Objective extract from DLRCC CDP 2022-2028

The Action Plan states that identification as a wildlife corridor does not preclude development of the future development lands identified in the County Development Plan 2022-2028 subject to assessment under the planning process and subject to any other legal obligations. Therefore, the subject proposal will undergo an Ecological Impact Assessment and a Screening for Appropriate Assessment.

It's noted that this application proposes to create a link to the 'Ticknock to River Dodder' wildlife corridor (Figure 29), such as the hedgerow planting or the creation of dedicated wildlife areas, which will follow best practice.

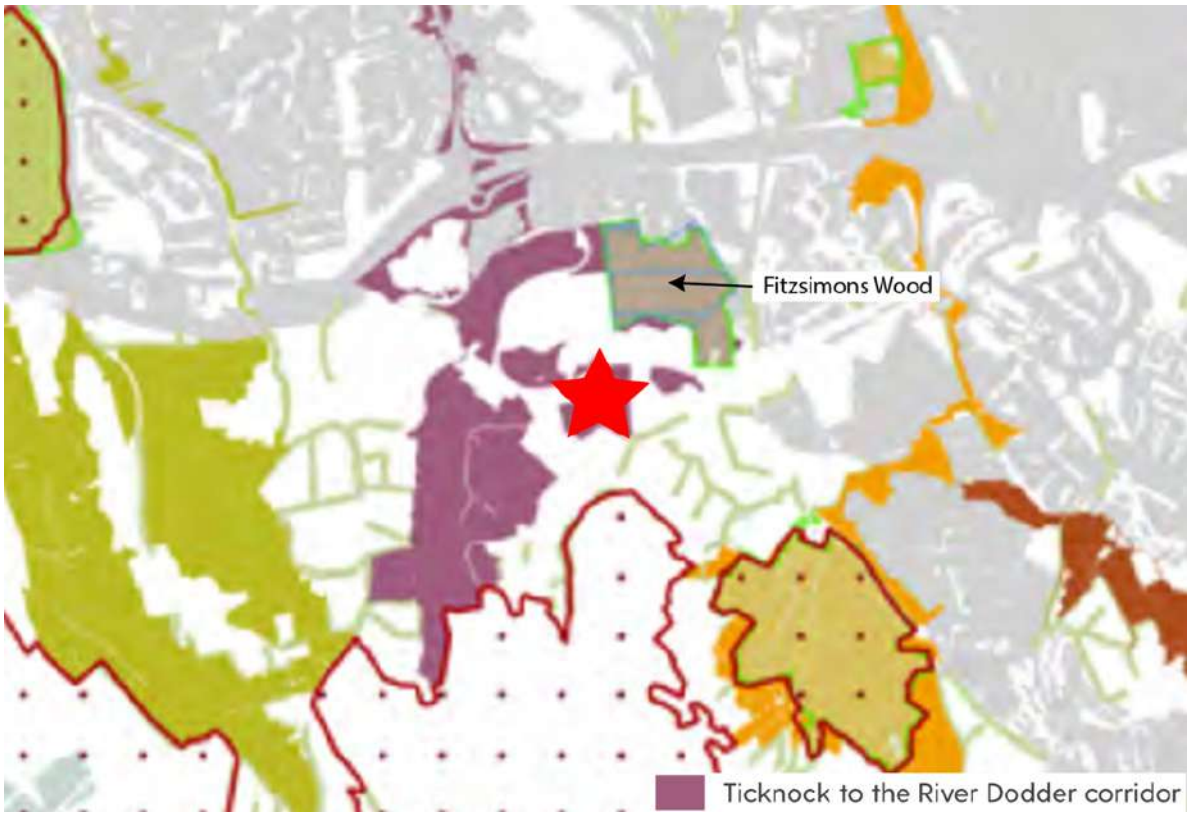


Figure 29 – Extract from DLR Biodiversity Action Plan 2021-2025 river/coastal wildlife corridor map indicating 'Ticknock to the River Dodder corridor 'in relation to subject site (outlined by red star)

The design and layout of the subject proposal will support and enhance the proposed link to the wildlife corridor, which connects the Dublin Mountains to the Fitzsimons Wood proposed National Heritage Area (pNHA) (refer to Figure 29). The Fitzsimons Wood pNHA is included in some of the county's few remaining native woodlands, which has been designated to conserve species and habitats of national importance. The proposed link shall clearly demonstrate that there will be no significant adverse impact on the habitats, and species of interest in the designated areas, including its ecological integrity.

The proposed link shall contribute to the Ecological Network by adding biodiversity to the area. The Action Plan further notes that there is an opportunity for any development to restore and enhance biodiversity in the design and layout of any scheme, and also to address climate action, which the subject developments link proposes. The design team are mindful of the wildlife corridor and the landscape design has been developed to accentuate the proposed link and green routes through the site. It is further noted that even outside the highlighted zone, the development site aims to maintain and strengthen the green link between these areas, due to their proximity to the site.

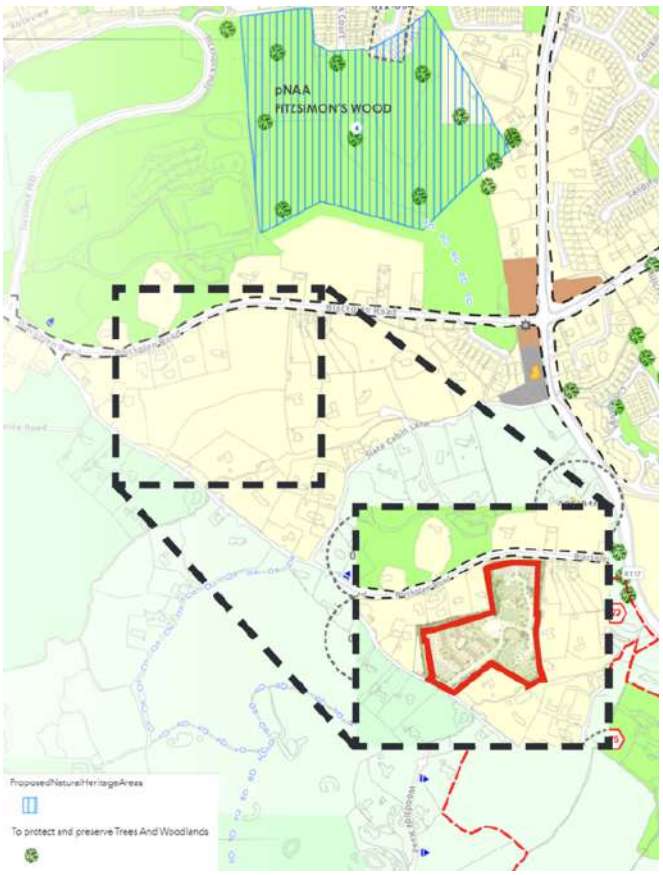


Figure 30 – Site in relation to pHNA Fitzsimons Wood (extract from Gannon & Associates Landscape Design Rationale)



Figure 31 – Wildlife refuge corridor (extract from Gannon & Associates Landscape Design Rationale)



Figure 32 – Landscape Strategy (extract from Gannon & Associates Landscape Design Rationale)

As illustrated in the figure above, multiple green links are proposed, which shall integrate the proposed landscape design into the existing landscape context to facilitate public permeability through the site south, to the Dublin Mountains and north to Fitzsimons Wood.

Green links are proposed to connect with Fitzsimon's Wood National Park, which shall preserve natural paths for animals, such as deer. This will be provided to the south-east/south side of the side through a wildlife corridor with broom and pine trees, that shall provide habitat diversification and promotion of coexistence. A public open space tree trail is also proposed to the north-west/west side of the subject site to provide another wildlife corridor with oak and birch woods, which shall enrich local biodiversity. In addition, there shall be internal paths with green areas and green connections all throughout the site.

A Wildlife Refuge and Biodiversity Management Plan (WRBMP) has been prepared for the Proposed Development by Enviroguide with input from Gannon's and Associates landscape architects and accompanies this application under separate cover. The WRBMP describes the creation of the refuge area and its management into the future, along with the required monitoring approach to ensure its success.

The provision of new amphibian breeding, refuge and foraging habitat in the form of wildlife ponds, hibernacula and bioretention areas will benefit local frog populations known to be present at the Site. The placement of bat rocket boxes along a known bat commuting foraging route along the Site's southern and

eastern boundaries will provide a net increase in roosting habitat for the local bat population. The increased planting of native trees and the management of the wildlife refuge to maintain areas of exposed bedrock, will benefit the local breeding bird and lizard populations respectively. All in all, the provision of the wildlife refuge will ensure that wildlife can coexist at the Site alongside the proposed residential development, and that habitat connectivity with the surrounding ecological environment is not compromised.

To achieve the goals of the management plan, the management approaches detailed in the management plan will be adhered to by the developer, ecologist and management company as will the various recommendations and commitments relating to post-construction monitoring of vegetation management regime, bats, birds and pollinator habitat. Should any of the proposed mitigation and/or monitoring measures recommended fail to be adhered to, the Local Authority shall be informed, and appropriate remedial actions will be agreed upon.

The final creation, management and monitoring approach will be confirmed with the agreement of the DLR Biodiversity Officer should grant of planning be received.

In addition, an Invasive Species Management Plan has been prepared by INVAS Biosecurity for the site of the Proposed Development and is Appended to the EcIA in Appendix V.

10.1.7 Height

The Development Plan 2022-2028 contains a Building Height Strategy (Appendix 5), which is considered of particular relevance to the subject site. However, we acknowledge that the recently published 'Building Height Guidelines' entitled 'Urban Development and Building Heights - Guidelines for Planning Authorities December (2018)' supersede the requirements of the Building Height Strategy. Section 34(2) (ba) of the 2000 Act, provides in effect that the requirements of an SPPR will take precedence over any conflicting provisions of the Development Plan:

"where specific planning policy requirements of Guidelines referred to in sub-section 2(aa) differ from the provisions of the Development Plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the Development Plan."

Section 4.8 of the Building Height Strategy sets out a policy approach for residual suburban areas not included within Cumulative Areas of Control as set out in the Building Height Strategy.

It is stated that apartment or town-house type developments or commercial developments in the established commercial core of suburban areas to a maximum of 3-4 storeys may be permitted in appropriate locations - for example on prominent corner sites, on large redevelopment sites or adjacent to key public transport nodes - providing they have no detrimental effect on existing character and residential amenity.

The current proposal is predominantly 4 storeys with a maximum height proposal of 5 storeys set back due to the sites undulating topography, reduced from a maximum of 6 storeys previously proposed under ABP REF. 314459-22 and is located on a sizable development site proximate to local transport nodes and is considered to retain all levels of existing residential amenity afforded to adjoining properties.

10.1.8 Density

Section 12.3.3.2 of the Development Plan sets out the requirements for Residential Density. The Development Plan states that '*the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document: 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport'.*

Policy PHP18 of the Development Plan generally promotes higher residential densities subject to the reasonable protection of residential amenity and the established character of the area.

Policy Objective PHP18: Residential Density
"It is a Policy Objective to: • *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.* • *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development."*

Table 13 -Policy Objective extract from DLRCC CDP 2022-2028

The overall development provides for a residential density of 59.22 units per ha (reduced from 97.3 units per hectare) based on the substantive development area of 3.83ha, and a proposal for 192 units on a central site.

This residential density is considered appropriate to the site given that the scheme has been amended twice. The number of units has previously been reduced from 400 to 360 units under SHD Ref. 314459-22 and reduced again under the current proposal from 360 units to 192 units. The Inspectors report further noted under SHD Ref. 314459- that "*densities of less than 50 units per hectare is inappropriate given the large site holding of circa 3.7ha, the residential zoning objective on the lands and other relevant National Planning Policy*."

The proposed residential development also is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' and 'Irish Design Manual for Urban roads and streets'.

10.1.9 Design and Layout

Section 12.3.1 of the Development Plan states that it is a Policy Objective to promote high quality design and layout in all new development. It is stated that new residential developments should offer a high-quality living environment for residents, both in terms of the standard of individual dwelling units and in terms of the overall layout and appearance of streets and outdoor spaces.

The current proposal has considered the reasons for refusal under ABP REF. 314459-22 relating to design and layout. The current proposal has omitted apartment blocks C1, C2 and C3 and has replaced them with duplexes (C1, C2, C2A) and houses (D1 & D2). Omitting the previously proposed apartment blocks considers the site's sensitive location and successfully integrates the development into and enhances the character of the surrounding area, without impacting upon the visual amenities and character of the area.

10.1.10 Unit Mix

According to Appendix 2 of the Development Plan, policy objective PHP27 refers to housing mix and states the following:

"It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA."

Table 14 – Policy Objective PHP2: Housing Mix (extract from Appendix 2, DLR Development Plan)

Section 12.3.3.1 of the Development Plan further outlines unit mix in relation to proposed residential developments and refers to Table 14 below:

Area	**Threshold**	**Mix Studio/1/2 bed Requirement (Apartments and duplexes)**	**3+ bed Requirement (Apartments)**
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

Table 15 – Extract from table 12.1. Apartment Mix Requirements (Section 12.3.3.1)

To demonstrate compliance with PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications for 50+ residential units with lands located within the neighbourhood will be required to incorporate a variety and choice of housing units by type and size to meet the differing household need in the County. The proposed provision of residential units shall provide a good mix that reflects existing, and emerging household formation, housing demand patterns and trends identified locally and/or within the County.

The proposed unit mix previously comprised 123 no. (34%) 1-beds, 224 no. (62%) 2-beds and 13 no. (4%) 3-beds under ABP REF. 314459-22, however, the planner's report specifically noted that any future scheme should be compliant with the Development Plan standard in Table 1 with a max of 30% 1 beds and a minimum of 20% 3 bed units.

The mix within this development proposal is as follows:

- 33 no. (17.2%) 1 bed units,
- 84 no. (43.8%) 2 bed units,
- 61 no. (31.8%) 3 bed units; and
- 14 no. (7.4%) 4 bed units.

It is submitted that the current proposal complies with the Development Plan requirements for residential mix.

10.1.11 Dual Aspect

The Development Plan notes **in 'suburban or intermediate locations' it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. The development plan states dual aspect apartments should have openable windows on two or more walls which provides a view in more than just one direction.**

We can confirm that the majority of units in the proposed apartment blocks are dual aspect. The design team has made every effort to avoid single **and north facing units, which provides 155no. units that are all dual aspect. This equates to 80.7% dual aspect units out of a total 192 proposed apartment, duplex and house units.**

Table **16 below quantifies the new build dual aspect units. Please refer to the figure below for the location of the dual aspect units.**

Blocks	Units	DU %
Block A1	12	80%
Block A2	22	84.6%
Block B1+2	34	66.7%
Block B3+4	33	71.7%
Block C	40	100%
Block D	14	100%
Total	**155**	**80.7%**

Table 16 – Dual aspect overview



Figure 33 – Dual aspect overview (extract from OMP design statement)

10.1.12 Landscape and Open Space

The Development Plan sets out a default minimum of 15% of the site area to be delivered as open space. The public open space requirement for the subject site of 3.83 ha is 5745 sqm. The subject proposal exceeds this requirement and provides a total of 8,686.56 sqm (22.27%) within the scheme which will make a positive contribution to the proposed development, bringing a new sense of place and upgraded urban realm to this area of Blackglen. In addition to public open space, the Development Plan requires the provision of communal open space for apartments **and duplexes as follows:-**

Unit Type	Minimum Area per Unit	Requirement
1 bed	5 sqm	33 x 5 = 165 sqm
2 bedrooms (3 bed)	6 sqm	16 x 6 =96 sqm
2 bedrooms (4 bed)	7 sqm	68 x 7 = 476 sqm
Three bedrooms	9 sqm	47 x 9 = 423 sqm (excludes 3 bed houses)
Four +	12 sqm	14 x 12 = 168 sqm
Total		**1,328 sqm**

Table 17 – Communal Open Space Standards

The current proposal exceeds the requirements outlined above with a provision of 2,168.09sqm (5.44%) of communal open space provided at ground level and accessible podium roof gardens. The layout of the communal open space areas have been arranged to ensure that these spaces are safe, secure and well maintained. The spaces will have the benefit of passive surveillance from the proposed apartments.

The current proposal delivers on the full communal open space requirement at grade at 2,168.09 sqm, which is over and above the 1,328 sqm required. Regarding private open space, the following recommendations are set down in the County Development Plan for apartments and houses:-

Unit Type	Minimum Area per Unit	Requirement
1 bedrooms	5 sqm	33 x 5 = 165 sqm
2 bedrooms (3 person)	6 sqm	16 x 6 = 96 sqm
2 bedrooms (4 persons)	7 sqm	68 x 7 = 476 sqm
Three bedrooms	9 sqm	47 x 9 = 423 sqm
Four +	12 sqm	14 x 12 = 168 sqm
Total		**1, 328 sqm**

Table 18 – Private Open Space Standards for apartments

Unit Type	Minimum Area per Unit	Requirement
3 bedrooms	60 sqm	14 x 60 = 840 sqm
Total		**840 sqm**

Table 19 – Private Open Space Standards for houses

All of the apartment/duplex unit types will comply with the minimum standards for private open space with each unit provided with a balcony or terrace area. It is noted that while 6no. 3-bedroom houses fall slightly short of the prescribed minimum 60 sqm for private open space, they do meet the requirements set out in the recently adopted Sustainable Compact Settlement Guidelines, which stipulate a minimum of 40 sqm. These Guidelines take precedence over the Development Plan and are therefore the relevant standard in this case. Additionally, the remaining houses significantly exceed the 60 sqm minimum for private open space as outlined in the Development Plan.

For clarity, the open space provision is outlined below as per material from OMP Architects and Gannon and Associates Landscape Architects:

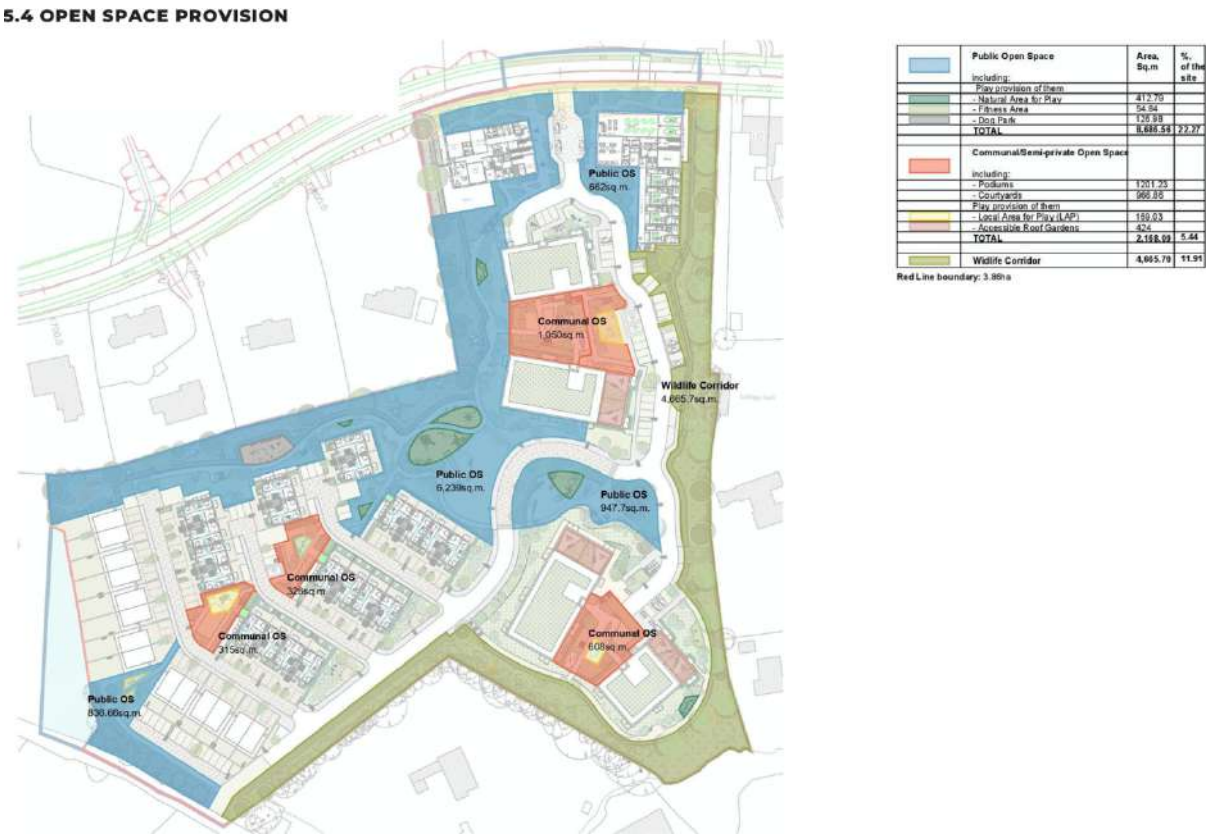


Figure 34 – Open Space Provision

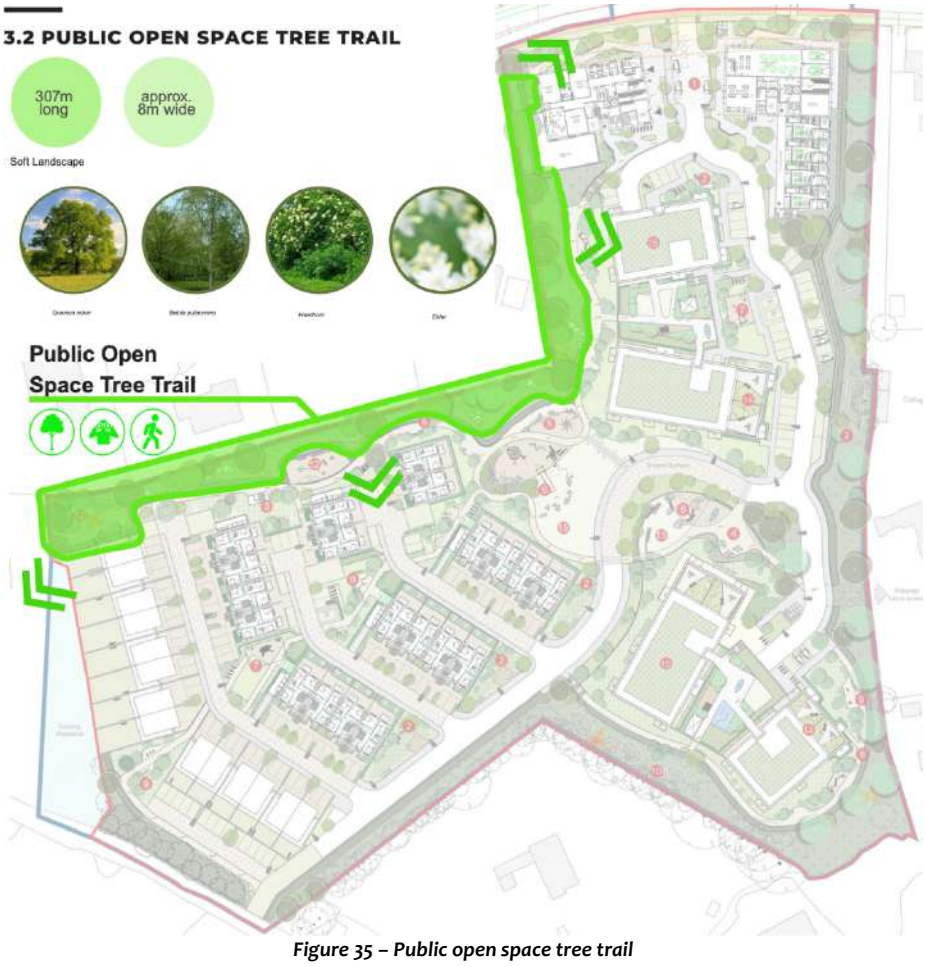


Figure 35 – Public open space tree trail

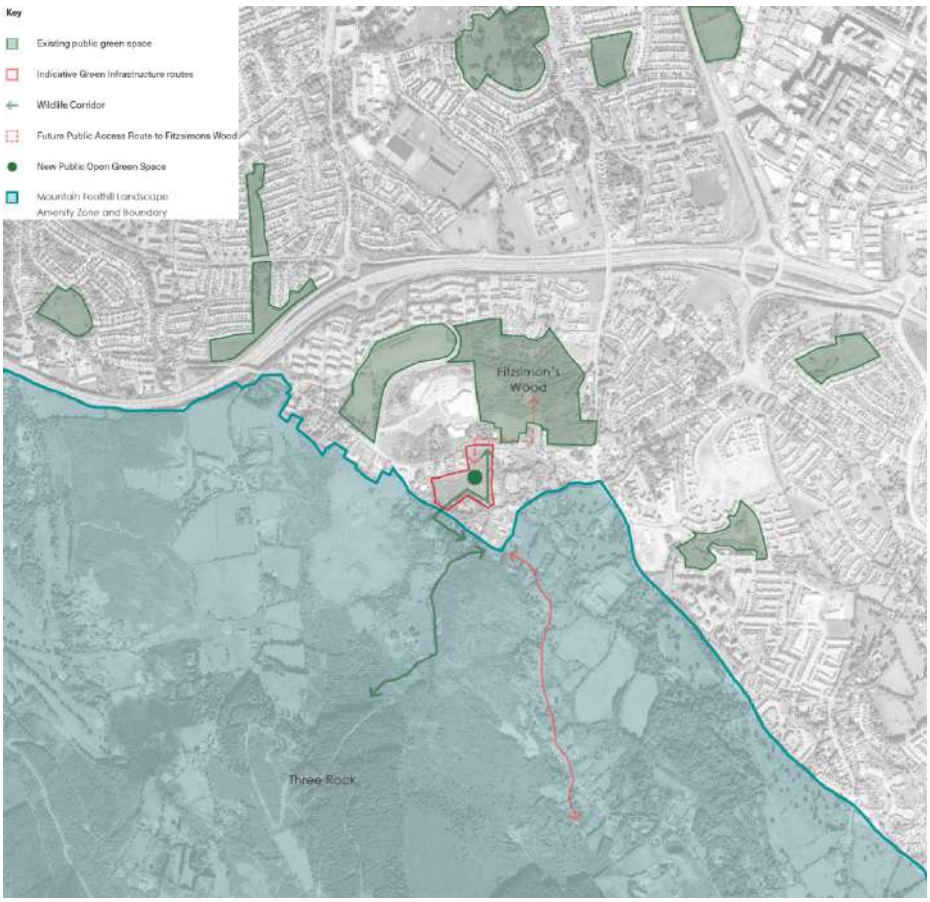


Figure 36– Public open green space integrated into surrounding green infrastructure areas

The proposal's new public open green space has been intentionally integrated into the surrounding areas green infrastructure with new pedestrian access proposed along Blackglen Road, creating the possibility for a future connection to Fitzsimon's Woods.

For full details on the nature and design of public and communal open space, we refer the Planning Authority to the drawings and landscape design rationale prepared by Gannon & Associates, the scheme's Landscape Architects.

The landscape design rationale demonstrates that the scheme prepared for this development is founded on a strong awareness of the site context and the established landscape character. The main focus of the proposal was to create a liveable, safe and sustainable environment for residents and for biodiversity.

11 CONCLUSION

On review of the new LRD scheme, we can confirm that the proposal is in accordance with relevant statutory documents governing the site and that there is an appropriate planning context for this proposal. We note specifically that this new LRD proposal has had specific regard to new policy, objectives and standards for residential mix, height and density and we are of the considered view that the current proposal is consistent with the provisions of the Dún Laoghaire Rathdown County Development Plan 2022-2028.

The proposed development has also been advanced following careful consideration of the feedback provided by Dún Laoghaire Rathdown County Council representatives present at the Section 247 meeting and Section 32B LRD meeting. In light of this, we now invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at a transitional location within the urban fringe of Dublin, along Blackglen Road in Sandyford. It is a large, underutilised site that is opportunely located, in terms of proximity to public transport and local amenities/services, making it an ideal location to deliver much needed residential accommodation.

- A total of 192 no. residential apartment units are proposed, which are broken down as 33 no. 1-beds, 84 no. 2 -beds, 61 no. 3-beds and 14 no. 4-bed units with associated residential amenity services in 4 no. apartment blocks A1 – B4), 40 no. duplexes (C1, C2, C2A) and 14 no. house units (D1 & D2) interlinked blocks ranging in height from 2-5 storeys over podium level/basement level areas. The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.

- A childcare facility is proposed at ground floor level of Block A1 and is afforded with a dedicated outdoor children's play area.

- Variation in building height along with a mix of residential units, ground floor level resident amenities, a childcare facility and a bike workshop, all combine to provide a rich living environment close to a host of facilities and landscape amenities.

- The proposed development with its active frontage at the entrance plaza and the proposed public open spaces creates a welcoming pedestrian environment, active public realm and further develops the sites relationship with the existing shops and services to the east at Sandyford Village.

- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g. Housing for All, NPF, Rebuilding Ireland and RSES) and we ask that that is considered in the review of this proposal.
- The proposed use is acceptable in principle at this site and under the 'A' zoning. There is therefore an appropriate planning context for this proposal along with the childcare facility proposed.
- We confirm that we have addressed insofar as possible all feedback and Opinion Items received from Dún Laoghaire-Rathdown County Council.

The applicant is eager to proceed with a permission for this site and it is hoped that this application will be the all-encompassing permission that will enable construction to commence on site.

All considered, the current proposal represents a significant development opportunity for the immediate locality in that it delivers a suitable residential scheme on zoned and serviced lands. This accords with the national policy mandate for the delivery of housing and services at appropriate locations.