Statement of Consistency

For Development at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

on behalf of Barry's Field Ltd.

January 2025



McCutcheon Halley

CHARTERED PLANNING CONSULTANTS

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Contents

1. Introduction 3
1.1 Context 3
1.2 Summary Statement of Consistency 4
2. National Planning Policy 9
2.1 Project Ireland 2040: National Planning Framework, 2018 0
2.2 Housing for All – A New Housing Plan for Ireland 2021 10
2.3 Sustainable Residential Development and Compact Settlement Guidelines 2024 12
2.4 Design Manual for Urban Roads and Streets, 2019 20
2.5 Sustainable Urban Housing: Design Standards for New Apartments, 2022 24
2.6 Urban Development and Building Heights Guidelines for Planning Authorities, 2018 30
2.7 Regional Spatial and Economic Strategy for the Southern Region .. 35
3. Local Planning Policy 37
3.1 Cork Metropolitan Area Transport Strategy (CMATS) 2040 37
3.2 Cork City Development Plan 2022-2028 40

1. Introduction

1.1 Context

This Statement of Consistency has been prepared by McCutcheon Halley Chartered Planning Consultants, in conjunction with O'Mahony Pike Architects, DOSA Engineers, Arup, John Cronin and Associates, Lane Purcell Archaeology, MHL and Associates on behalf of Barry's Field Ltd to accompany a Large Scale Residential Development (LRD) application at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

The proposed development consists of

- The construction of 124 no. residential units (comprising of a mix of 1 to 3 bed apartments and duplexes) in two separate blocks ranging from 1 to 5 storeys;
- The construction of ground floor cafe and office units; and
- Development works including drainage, footpaths & pedestrian connections, landscaping and amenity and public and communal open space areas, bicycle & car parking, public lighting and all other ancillary development at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

This report provides a Statement of Consistency with the relevant planning policy documents at national, regional, and local levels. The Statement addresses the relevant policy documents individually, assessing consistency with the principles and relevant objectives in a matrix form.

Sections 2 and 3 of this report reviews the proposed development against the following national, regional and local planning policy:

- Project Ireland 2040: National Planning Framework, 2018
- Housing for All – A New Housing Plan for Ireland 2021
- Rebuilding Ireland: Action Plan for Housing and Homelessness, 2016
- Sustainable Residential Development in Urban Areas, 2009
- Urban Design Manual – A Best Practice Guide, 2009
- Design Manual for Urban Roads and Streets, 2013
- Childcare Facilities Guidelines, 2001
- Sustainable Urban Housing: Design Standards for New Apartments, 2022
- Urban Development and Building Heights Guidelines for Planning Authorities, 2018
- Regional Spatial and Economic Strategy for the Southern Region
- Cork Metropolitan Area Transport Strategy (CMATS) 2040
- Cork City Development Plan 2022-2028

1.2 Summary Statement of Consistency

This section summaries the proposed development's compliance with the planning policy on the following themes:

- Context and connections
- Density and Housing Mix
- Layout
- Landscape and Amenity
- Sustainability

This summary assessment also incorporates the 12 design principles set out in the Urban Design Manual.

1.2.2 Context and Connections

The proposed development site is located in the centre of Douglas. Church yard lane bounds the west and Carrigaline Road is located to the east of the site. The site is neighboured to the north by a mix of residential and commercial buildings and is a greenfield site, approximately 0.84ha (net area) in size. The site is bounded by existing trees and stone walls along the eastern and western edges of the site. Directly south of the site is a telecom exchange and St. Lukes Church and graveyard are located to the southwest area of the site.

The site is within Douglas town centre, and the majority of amenities are easily accessible and in close proximity to the site. Douglas Village Shopping Centre is only a 3-minute walk from the site, while Douglas Court Shopping Centre is a 10-minute walk.

Douglas town centre is in close proximity to areas identified as Strategic Employment Locations, Mixed Use Employment & Regional Assets in the Cork City Council Development Plan 2022, such as Cork City Centre, Mahon, and Cork Airport all of which are within a 10-kilometre distance of Douglas.

1.2.3 Density and Housing Mix

The Sustainable and Compact Settlement Guidelines 2024 were published on January 15th, 2024, and replaced the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009.

The guidelines 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 sustainable and compact settlements. The guidelines emphasize the renewal of existing settlements and the importance of well-designed, mixed-use neighbourhoods to reduce reliance on cars, improve access to services, and protect the environment. Planning authorities should aim for a '15 minute city' model where residents can access essential services within a short walk or cycle from home.

The subject site would be categorised as a 'City-Urban Neighbourhood', as it has it is near a planned high-capacity public transport node, with good access to employment, education, and institutional uses. This would suggest densities between 50 to 250 dwellings per hectare.

In terms of residential density and building height, the Cork City Development Plan 2022 has identified Douglas as an Inner Urban Suburb and having prevailing building heights of 2 to 3 storeys and densities ranging from 5 to 20 units per hectare. It is noted that these ranges have been increased in the Cork City Council Development Plan 2022 and it envisions Douglas to be an area with a density band of 50 dph on the lower end and 100 dph on the higher end. The building height band is 1 floor on the lower end and 5 floors on the higher end.

Using the net developable area, the overall density has been calculated at 153.7 units per hectare which is in accordance with local and national guidelines.

Statement of Consistency: DENSITY

An overall net residential density of 153.7 units per hectare has been achieved in accordance with *Sustainable Residential Development and Compact Settlement Guidelines 2024*.

With regard to **housing mix**, household sizes both nationally and in Cork are getting smaller and it is therefore imperative that the market ensures the development of a greater mix of units, and an increase in the delivery of smaller units in tandem with larger family units. The layout proposes 124 no. units consisting of 50 no. 1-bed, 64 no. 2-bed and 10 no. 3-bed units. The variety of unit sizes proposed focuses on providing smaller units, affordability and quality housing, in accordance with the relevant policies and within close proximity to major employment centres.

Statement of Consistency: HOUSING MIX

The proposed development provides a range and mix of 1-bed (40.3%), 2-bed (51.6%) and 3-bed (8.1%) units to be provided in a mix of apartments and duplex units to meet the needs of the area. A dwelling mix report has also been prepared by McCutchen Halley Planning Consultants as part of this LRD application.

1.2.4 Layout

Connectivity

The proposed development provides for good pedestrian connection to the town centre and the neighbouring amenities via east and west of the site. The development will promote compact growth through linking with the existing public, private and non-motorised transport infrastructure in the area. The proposed layout maximises connectivity and permeability through the site with a comprehensive network of linked footpaths provided across the site connecting Old Carrigaline Road and Churchyard Lane. In addition, pedestrian works will be carried out on Churchyard Lane to improve the public realm.

Inclusivity

The proposed units offer a range of smaller accommodation choice, in terms of both unit size and configuration. This variety will be attractive to smaller families, couples and those looking to downsize. The design and layout of the proposed development meets the requirements of all relevant documents, in particular Part M of the Technical Guidance Documents which deal with accessibility and inclusivity design. The proposed scheme has been designed so that it can be accessed and used to the greatest extent possible by all people regardless of their age, size or ability.

The open space areas will be accessible to all, and paths will be hard surfaced with attractive signage where relevant. All areas, whether public, private or communal, will be well defined and accessible to all, encouraging the use of the public realm by the community of Douglas. All buildings are designed and sited to provide passive surveillance of the public realm, including streets, paths and open spaces.

Distinctiveness

Douglas, which is a suburb of Cork has evolved from a small village into a thriving suburban area with a good blend of residential, commercial and recreational facilities. Significant expansion of Douglas was seen in the 20th century, as a result of urban sprawl from Cork City. Douglas has a distinctive mix of older houses, estates and apartment complexes.

Douglas is characterized by a mix of housing types, including detached and semi-detached houses, apartment complexes, and housing estates, which contribute to a moderate to high residential density.

The proposed development aims to create a series of recognisable features which reinforce a sense of place and attachment for future residents. The proposed design and layout of the development will create distinct neighbourhood which will complement the area surrounding the site but will be sufficiently individual to promote their own sense of place.

The buildings will use materials, proportions and features that respect and enhance the existing local setting, but express it in a more contemporary way, balancing a palette of materials that will offer a cohesive and mixed layout, whilst respecting the existing houses within the locality.

The proposal also utilises existing site features and exploits same to create a distinctive and recognisable built environment. Where appropriate, dwellings will benefit from attractive views both internal to the site (i.e. of the proposed grassed open spaces, proposed planting etc.) as well as longer range views over the surrounding townscape.

Parking

A total of 26 no. car parking spaces are provided. A significant amount of bicycle parking is also provided on site with 212 no. secure bicycle spaces for the residents, 62 spaces provided for visitors on the site.

Detailed Design

The chosen materials comprise of neutral brick cladding (textured grey), with standing seam metal classing and metal balconies.

With regard to form, it is noted that the elevations of the buildings are broken down into bays for a more interesting elevation. This is also reminiscent of traditional fenestration patterns. The careful selection of materials used will contribute to the mindfulness of the character of the area and ensure its preservation.

1.2.5 Landscape and Amenity

Public Realm

The proposed development is bound by Carrigaline Road to the east, and Churchyard Lane to the west. The site is screened by mature trees from the Barry's of Douglas Bar and Restaurant located north of the site. Churchyard Lane is a narrow road, lined by a stone wall and mature trees. A telephone exchange premises is located to the south of the site. The site proposes linking pedestrian paths to provide a high quality, public realm for both future residents and visitors to the site. The proposed paths and open green spaces are overlooked by the surrounding residences which will foster a sense of ownership amongst the community.

Privacy & Amenity

The proposed layout has been designed to ensure that each residential unit within the development will have a high standard of residential amenity and privacy. This has been achieved by carefully locating, orientating and positioning each apartment block.

Statement of Consistency: LANDSCAPE AND AMENITY

Overall high-quality landscaping and amenity areas have been provided which will help create an attractive development for residents to reside.

1.2.6 Sustainability

Efficiency

The design seeks to strike an appropriate balance between achieving the required densities alongside open space requirements to ensure that the zoned land is used efficiently, whilst quality of environment and place is retained. Higher densities have been achieved in the form of apartments which are appropriately sited to complement the existing topography of the site.

Landscaped areas consist of the open spaces and a pocket park. The landscaping proposal aims to create an outdoor environment that is suitable for the local residents, while being integrated into the surrounding neighbourhood. A centrally located communal spaces will provide opportunity for informal play and social interaction. SuDs principles have

also been incorporated wherever possible. This includes incorporated features such as bioretention areas and filter drains within the landscaped areas.

All units are designed to maximise passive solar gain through the solar orientation. This is balanced with the requirements of good urban form and the provision of ample open space. 52.4% of the units are dual aspect which ensures adequate daylight and passive warmth, as well as access to direct sunlight at various parts of the day.

With regard to waste provision and collection, storage areas for bins are provided within the apartment block.

2. National Planning Policy

This section assesses the consistency of the proposed development with the following national policy documents and guidelines:

- Project Ireland 2040: National Planning Framework, 2018
- Housing for All – A New Housing Plan for Ireland 2021
- Sustainable Residential Development and Compact Settlement Guidelines 2024
- Design Manual for Urban Roads and Streets, 2019
- Sustainable Urban Housing: Design Standards for New Apartments, 2022
- Urban Development and Building Heights Guidelines for Planning Authorities, 2018
- Regional Spatial and Economic Strategy for the Southern Region.

2.1 Project Ireland 2040: National Planning Framework, 2018

The National Planning Framework (NPF) was launched in 2018 and provides the Government's strategic plan for "shaping the future growth and development of our country out to the year 2040". The NPF established strong growth targets for Ireland sets a policy framework to deliver compact urban development with at least 50% of all future population and employment growth to be focused on the existing five cities and their suburbs. The NPF sets out National Policy Objectives (NPOs) to guide development throughout the country in line with the overall National Strategic Outcomes set out in the framework. The table below assesses the proposed development against the relevant NPOs.

NPO No.	NPO	Statement of Consistency
2a	A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs	✓ The subject site is located with the existing built-up footprint Douglas town, a suburb of Cork City within the Cork City Council boundary and within the Cork City and Suburbs CSO settlement boundary.
3a	Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements	✓ As above.
3b	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints	✓ As above.
4	Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.	✓ The proposed development will provide a high-quality mixed-use development with residential unit's, a café and an office spaces. This will ensure the scheme is attractive, liveable, and will cater to the needs of the population.
5	Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity	✓ The proposed development will increase the housing supply and population within Douglas which will contribute to creating Douglas as a town of scale and will also support the continuing growth of Cork City.
6	Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment	✓ The proposed development will provide additional homes in Douglas to support the growing population and

	activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area	will also provide a café and an office space community space to support the future population.
11	In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.	✓ The subject site and proposed development is located within Douglas town centre.
13	In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected	✓ The proposal includes heights up to 5 storeys. These heights are considered appropriate and in line with national objectives for increased densities and compact growth. ✓ The proposal includes 26 no. car parking spaces. This is in line with recent national, regional, and local policies for reduced dependency on private car ownership.
26	Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.	✓ The site includes 1,259.2m2 of public open space and 828.5m2 of communal open space on site which will provide space for recreation and leisure. ✓ The site is within a 5-minute walk of the Douglas Court shopping centre and 3-minute walk to Douglas Village shopping centre both of which are be easily accessible from the subject site.
27	Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages	✓ The proposed development has been designed to ensure walking and cycling are attractive alternatives to the car. The scheme provides an amenity pathway that connects Old Carrigaline Road and Churchyard Lane through the site providing an alternative route for pedestrians/cyclists that is safely separated from the streets used by cars and other vehicles.

28	Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.	✓ The includes a café and office spaces to serve the subject site, and the wider Douglas area.
31	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 of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations; - The expansion and consolidation of 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	✓ The proposed development is in a close proximity to 5 no. existing creches and 5 no. existing schools, 3 of which are primary, and 2 no. are post-primary schools. ✓ The site is well serviced by Bus which connect Douglas to Cork City and provides access to Higher Education.
32	To target the delivery of 550,000 additional households to 2040	✓ The proposed development will provide 124 no. homes which will help achieve this target of 550,000 homes to 2040.
33	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	✓ The proposed development is located in a close proximity just south to Douglas town centre, on lands zoned for Mixed -Use development. The site therefore is the next logical site to develop a mixed-use residential scheme.

34	Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	✓ The proposed apartments are designed to provide homes that will provide opportunity for people to adapt their living to smaller units and will promote rightsizing.
52	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.	✓ An EcIA is submitted by Limosa Environmental which confirms that the proposed development has regard to all relevant environmental legislation and the sustainable management of our capital. ✓ An AA Screening has been completed by Limosa Environmental for the proposed development which confirms that the proposal has regard to all relevant environmental legislation and the sustainable management of our capital.
53	Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.	✓ The subject site is located south of Douglas town centre. The development of the site will contribute to the town centre and will provide a neighbourhood centre to support the new residents.
56	Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.	✓ The Waste Management Plan prepared by DOSA Consulting Engineers submitted with this application outlines how the waste generated from the development will be minimised and managed.
57	Enhance water quality and resource management by: - Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities; - Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process;	✓ The subject site is not within a flood zone and does not have any history of flooding. ✓ SUDS measures have been addressed within the surface water management plan.

	Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places.	
60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.	✓ The proposal includes an Arboricultural Impact Assessment, and this notes that there are no Tree Preservation Orders on any of the trees on the site. ✓ Lane Purcell Archaeology confirmed that they carried out licensed archaeological testing on the site in 2017. Three test trenches were mechanically excavated across the site, with no features or finds or architectural significance noted.
62	Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas	✓ The proposed development is located within the existing built-up footprint of Douglas and will provide an alternative to one off housing within the greenbelt. ✓ The proposal's location is also distinct from the nearby settlements of Cork City which will ensure the merging of settlements is avoided.
63	Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	✓ DOSA Engineering Consultants have designed the surface water and stormwater drainage for the site which will ensure a clean environment.
64	Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient	✓ The proposal will provide a neighbourhood centre with café and office space and communal open space to serve the proposed residential units in the area. This will provide facilities within an attractive walking distance of people's homes and will therefore encourage people to

	buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	walk or cycle, reducing the emissions generated from short car journeys. ✓ The proposed units have been designed to eliminate fossil fuel use within the homes and will be built in line with NZEB standards.
75	Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	✓ An AA Screening report has been completed as part of the LRD application. ✓ An Ecological Impact Assessment Report has been prepared as part of this LRD application.

2.1A Draft Revised National Planning Framework, July 2024

The Draft First Revision to the National Planning Framework 2024, updates and strengthens Ireland's strategic planning approach, guiding sustainable growth and development through to 2040. Building on the foundations laid by the original 2018 framework, this revised draft sharpens the focus on sustainable urban and rural development, climate resilience, and regional balance, aligning Ireland's growth objectives with more ambitious environmental and social targets.

National Policy Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
4	A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs	✓ The proposed development is located within the settlement of Douglas, contributing to urban growth in line with the 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.	✓ The development is situated within the built-up area of Douglas, aligning with the objective to focus new housing within an established urban settlement.

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.	✓ The development is situated within the built-up area of Douglas, aligning with the objective to focus new housing within established urban settlements.
9	Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.	✓ The development is situated within the built-up area of Douglas, aligning with the objective to focus new housing within established urban settlements.
12	Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.	✓ The proposed development in Douglas is designed to create an attractive and well-integrated residential community. It includes high-quality design features, and well-distributed open spaces that support a high quality of life. The inclusion of play areas, pedestrian pathways, and landscaped spaces further enhances the liveability of the area, aligning with Objective 12 by promoting community well-being and cohesive urban design.
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.	✓ The development aims to increase the local population and support economic growth, aligning with targeted planning standards to enhance the vibrancy of Douglas. The scheme will also deliver a café and office uses which will bring activity within the area.
27	Continue to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.	✓ This development is a proportionate addition to the Douglas area, providing thoughtfully designed housing and local amenities, such as a cafe, which enhances the public realm.

38	Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.	✓ The development emphasizes pedestrian throughout the development and connections to promote sustainable transport modes within Douglas.
43	To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.	✓ The proposed 124 residential units contribute to the national housing targets, supporting sustainable population growth goals.
44	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	✓ The development of 124 units at a density of 153.7 units/ha is aligned with sustainable growth principles, reflecting the site's scale and location.
45	Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	✓ All units are designed for adaptability, meeting Guidelines and Part M compliance, ensuring they accommodate changing household needs.
78	Enhance water quality and resource management by preventing or mitigating the risk of flooding by: ▪ Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. ▪ Taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk	✓ Sustainable Urban Drainage Systems (SUDS) are incorporated to manage stormwater effectively, supporting the water quality and flood risk objectives.

	Management Climate Change Sectoral Adaptation Plan. ▪ Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. ▪ Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places.	
79	Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions and sustainable drainage systems.	✓ The project incorporates SUDS, prioritizing stormwater management and flood resilience.
84	In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by: ▪ Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory landuse plan. ▪ Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the	✓ The development plan integrates existing natural features and habitats, preserving biodiversity while incorporating green spaces and landscaping features.

	interests of ensuring continuity of habitat provision and reduction of associated risks and costs.	

2.2 Housing for All – A New Housing Plan for Ireland 2021

Housing for All – A New Housing Plan for Ireland is the Government's housing policy to 2030. It aims to improve Ireland's housing system and deliver more homes of all types for people with different housing needs. The overall aim of the Plan is that "everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life'. The plan provides the following four pathways for achieving this overarching aim:

- Supporting homeownership and increasing affordability.
- Eradicating homelessness, increasing social housing delivery, and supporting social inclusion.
- Increasing new housing supply.
- Addressing vacancy and efficient use of existing stock.

The Plan notes that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households as outlined in the NPF.

This plan includes an annual review with provision to amend the objectives as required. The first annual, released at the end of 2022, did not amend the fundamental policy approach and instead focused on prioritising measures to activate and accelerate the delivery of housing supply.

The table below assesses the proposed development against relevant policy objectives.

Reference	Policy	Statement of Consistency
1.10	Provide an average of 6,000 affordable homes each year under the provisions of a new Affordable Housing Act	✓ The proposed development will provide 124 no. homes with 20% provided as Part V social housing.
1.11	Ensure consistency in the application of the new arrangements under Part V by Local Authorities.	✓ The proposed development includes 20% Part V (25) units as indicated in the Part V layout plan prepared by OMP Architects.
4.7	Deliver over 10,000 social housing homes each year to 2030 and increase the stock of available social housing	✓ As above

17.9	Construct an average of 33,000 nZEB homes each year to 2030	✓ The proposed homes have been designed to nZEB standard.

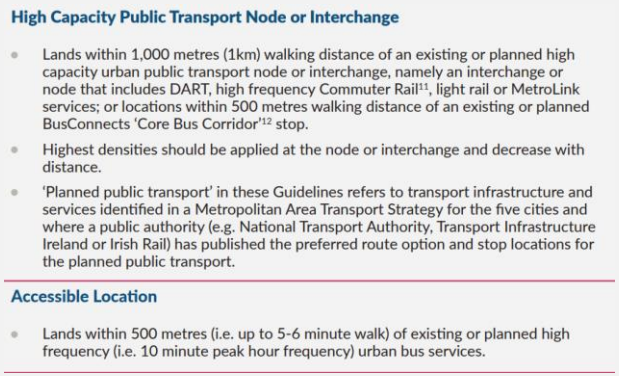
2.3 Sustainable Residential Development and Compact Settlement Guidelines 2024

The Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024 have been published to set national planning policy and guidance in relation to the planning and development of settlements and housing. The guidelines expand on the higher-level policies of the National Planning Framework (NPF) in relation to the creation of settlements that are compact, attractive, liveable and well designed.

The guidelines support the application of densities that respond to settlement size and to different place contexts within each settlement, recognising in particular the differences between cities, large and medium-sized towns and smaller towns and villages. The guidelines allow for greater flexibility in residential design standards, setting national standards for the first time that support innovation in housing design and a greater range of house types. The flexibility provided for within the guidelines are to assist in addressing viability constraints within the construction sector, while also adhering to national obligations imposed by European Directives and international agreements relating to the management and protection of the environment and biodiversity and the transition towards net zero by 2050.

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
Objective 3.1	It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate. Section 3.4 states the planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-	✓ As per Section 3.3.4 of the Guidelines, Douglas falls under the City Urban Neighbourhood criteria. Densities in City Urban Neighbourhoods should include proposals between 50 to 250dph. The proposed density of the development is 153.7 units/ha and is compliant with this objective. ✓ The subject site would be categorised as a 'City -Urban Neighbourhood' in the Compact Guidelines, as it has it is near a planned high-capacity public transport node, with good access to employment, education, and institutional uses. ✓ The site is within 500m of existing or planned high frequency urban bus services, the site would be considered an accessible urban location. Several bus routes (6, 7, 12, 14) serve the site using the stops at Douglas Village Shopping Centre or on Church Street (to the west of the site)

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	density range at peripheral locations. The definitions for accessibility terms are as follows:  **High Capacity Public Transport Node or Interchange** • Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport. **Accessible Location** • Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.	
Objective 4.1	It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.	✓ Section 2.4 of the Statement of Consistency provides an assessment of the proposal against DMURS. Please refer to this Section, which outlines how the proposed development responds to the principles, approaches and standards are set out by DMURS.
Objective 4.2	It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.	✓ The proposed development incorporates the key indicators of quality urban design and placemaking as set out in Section 4.4 of the Guidelines and as identified as the following; 1. Sustainable and Efficient Movement, 2. Mix and Distribution of Uses, 3. Green and Blue Infrastructure,

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
		4. Responsive Built Form, ✓ Sustainable and Efficient Movement: The proposed development is set fronting Carrigaline Road and Churchyard Lane. It proposed to interlink pedestrian and cyclists' pathways and open spaces with the neighbouring development. ✓ Mix and Distribution of Uses: The proposed development comprises a mix of primary and secondary streets which promotes walking and cycling while also allowing for vehicular movement throughout the scheme. A varied housing mix is proposed which includes the provision of 1-, 2- and 3-bedroom apartments which cater for a variety of needs and provides a greater choice for prospective residents. Green and Blue Infrastructure: The existing natural features of the site have informed landscaping proposals and additional on-site planting of native tree species and pollinator friendly plants. The scheme incorporates a number of open space areas which create opportunities for play and rest, catering for a variety of abilities. ✓ Responsive Built Form: The units proposed as part of the development are designed with modest architectural features to respect and tie in with the grain and architectural style of the area.
Objective 5.1	It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than	✓ The proposed development makes provision for a number of high-quality open spaces within the scheme. A total of open space provision of 1,259.2m2 of the net site area and 828.5m2 communal open space will be provided as part of the proposed development.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations. In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10- 15% range shall not therefore apply to new development in such areas.	
SPPR 1	When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where	✓ As part of the proposed development, a minimum separation distance of 16 metres is achieved between opposing habitable rooms.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces	
SPPR 2	It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards; 1 bed house - 20 sq.m 2 bed house - 30 sq.m 3 bed house - 40 sq.m 4 bed + house - 50 sq.m A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space. The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves. Apartments and duplex units shall be required to meet the private and semi- private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments,	✓ The proposed development includes the provision of private open spaces within dwelling houses which all meet the minimum requirements as prescribed by SPPR 2. ✓ A Housing Quality Assessment has been prepared by OMP as part of the LRD submission. ✓ The private open space provided are all of a high-quality design to ensure that the prospective residents are provided with an enjoyable amenity space.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	Guidelines for Planning Authorities 2023 (and any subsequent updates). In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity. This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.	
SPPR 3	It is a specific planning policy requirement of these Guidelines that: i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction	✓ Car parking has been minimised and it is proposed to provide a total of 26 no. parking spaces with the development, allowing 0.21 spaces per unit. The development also includes for a universal space and EV parking.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	of the planning authority, shall be 1.5 no. spaces per dwelling. iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.	
SPPR 4	Cycle Parking and Storage: 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	✓ The proposed development will provide 274 no. bicycle parking spaces broken down as follows: ▪ 208 no. bicycle parking spaces for residents ▪ 62 no. bicycle parking spaces for visitors ✓ In addition, another 4 no. bicycle parking spaces are identified as other for the commercial spaces.

Key Objective	Relevant Policy / Principle / Guideline	Statement of Consistency
	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 provide	✓ A total of 208 no. spaces are covered, secure, generally double-stacked bicycle spaces for the residents provided at a rate of 1 per bedroom, and 62 no. are visitor parking spaces in open Sheffield stands provided at a rate of 0.5 per apt, as per apartment guidelines. ✓ This is above the standards as prescribed by the Guidelines.

2.4 Design Manual for Urban Roads and Streets, 2019

The Design Manual for Urban Roads and Streets (DMURS) was initially published in 2013 and was updated in 2019. It seeks to place well designed streets at the heart of sustainable communities and supports broader government policies on the environment, planning and transportation. DMURS provides practical measures to achieve:

5. Highly connected streets which allow people to walk and cycle to key destinations in a direct and easy to find manner.
6. A safe and comfortable street environment for pedestrians and cyclists of all ages.
7. Streets that contribute to the creation of attractive and lively communities.
8. Streets that calm traffic via a range of design measures that make drivers more aware of their environment.

Section 2.2.3 outlines four core principles to guide a more place-based/integrated approach to road and street design. The proposed development is assessed against these four principles in the table below:

	Design Principle	Statement of Consistency
1	To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.	✓ The proposed internal layout will create a high level of permeability, particularly for pedestrians and cyclists.
2	The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.	✓ The proposed spaces will serve as multi-functional spaces that balance the needs of all users.
3	The quality of the street is measured by the quality of the pedestrian environment.	✓ The proposal provides a high-quality pedestrian environment with a layout that will ensure reduced vehicular speeds.
4	Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.	✓ The proposed layout has been designed by a multi-disciplinary design team.

The table below assessed the proposed development against further design principles within DMURS.

Key Design Principles	Provisions	Statement of Consistency
Integrated Street Networks	▪ Does the development create connected centres that prioritise pedestrian movement and access to public transport?	✓ The proposal provides a permeable and well-connected scheme that will integrate with the wider LRD development and existing residential developments in Douglas.
Movement and Place	▪ Does the development create a legible street hierarchy that is appropriate to its context? ▪ Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centres, shops, creche, schools etc.)	✓ The proposal creates a legible street hierarchy with interconnected streets that maximise the number of walkable/cyclable routes between streets and destinations.
Permeability and Legibility	▪ Has the street layout been well considered to maximise permeability for pedestrians and cyclists? ▪ Are the streets legible with maximum connection opportunities? ▪ Are blocks of a reasonable size and permeability, with	✓ Permeability for pedestrians and cyclists has been a key consideration throughout the design of this layout. ✓ The streets will be legible and provide connections throughout the scheme. ✓ The proposed blocks respond the site's constraints while also provide a high-quality, well-connected scheme.

	consideration to the street constraints?	
Management	▪ Is the layout designed to self-regulate vehicle speeds and traffic congestion?	✓ The street's layout has been designed to self-regulate vehicle speeds with the use of short stretches of road, shared surface, change of materials. ✓ The management of vehicle speeds will allow the creation of a pleasant and attractive environment.
Movement, Place and Speed	▪ Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed? ▪ Does the design promote a reasonable balance of both physical and psychological measures to regulate speed?	
Streetscape	▪ Does the scheme create an appropriate sense of enclosure in addition to a strong urban/suburban structure? ▪ Have street trees and areas of planting been provided where appropriate? ▪ Have active street edges been provided where appropriate? ▪ Is a palette of high quality surface materials and finishes provided?	✓ The proposed buildings will provide a strong sense of enclosure for the public realm including the streets and open spaces. ✓ The layout includes planting throughout the site – communal and private. ✓ The buildings fronting onto the streets will provide active frontages throughout the scheme along Carrigaline Road. ✓ The proposal will avail of a high-quality palette of materials and finishes.

Pedestrian and Cyclist Environment	▪ Are footways of appropriate width provided so as to ensure pedestrian safety? ▪ Are verges provided adjacent to larger roadways so as to provide a buffer between vehicular routes and pedestrian paths? ▪ Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations? ▪ Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required? ▪ Have cycle facilities been factored into the design?	✓ The proposed footpaths throughout the scheme have been provided with a width sufficient to cater for the expected pedestrian traffic. ✓ The scheme includes new pedestrian crossing as part of the proposed development located at Churchyard Land and Carrigaline Road.
Carriageway Conditions	▪ Are vehicular carriageways sized appropriately for their function / location? ▪ Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions? ▪ Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists? ▪ Has adequate parking / loading areas been provided?	✓ The proposed internal streets have been designed to reduce traffic speeds to create a pleasant and safe environment for pedestrians and cyclists. ✓ Appropriate car and cycle parking has been provided throughout the site.

2.5 Sustainable Urban Housing: Design Standards for New Apartments, 2022

The Sustainable Urban Housing: Design Standards for New Apartments 2022 (2022 Apartment Guidelines) updates previous guidelines issued by the Government in 2015, 2018, and 2020. The 2022 Apartment Guidelines are centred on the NPF's focus for compact growth and the recognition that to sustainably meet the number of new homes required in Ireland up to 2040 will necessitate a significant and sustained increase in housing output and apartment type development in particular.

The Guidelines outline Specific Planning Policy Requirements (SPPRs) to guide the preparation and assessment of apartment developments. Appendix 1 also provides minimum standards.

Section 2.4 outlines criteria to identify potential sites for apartment development as central and/or accessible, intermediate urban locations, and peripheral and/or less accessible urban locations. The Guidelines outline different criteria for apartment development, dependent on the location. The subject site would be considered a peripheral and/or less accessible urban location and would therefore be suitable for limited, small scale apartment development at low-medium densities.

The relevant policies and standards of the 2022 Apartment Guidelines are outlined below:

Reference	Relevant Policy	Statement of Consistency
Apartment Floor Area	SPPR 3 provides the following minimum floor areas for apartments: ▪ Studio: 37 sqm ▪ 1 bed: 45 sqm ▪ 2 bed: 73 sqm ▪ 3 bed: 90 sqm Appendix 1 sets out minimum floor areas for the living/kitchen/dining areas, bedrooms, private amenity spaces, and storage spaces.	✓ The proposed apartment and duplex units have all been designed in line with these standards. Refer to HQA by OMP Architecture.
Unit Mix	SPPR 1 notes that housing developments may include up to 50% one bedroom or studio type units and there shall be no minimum requirement for apartments with three or more bedrooms.	✓ The proposal includes 40.3% one bed units, 51.6% two bed units, and 8.1% three bed units. ✓ The proposed unit mix is in line with SPPR 1.

Dual Aspect Ratio	Section 3.17 requires a minimum of 50% dual aspect apartments on greenfield sites and a minimum of 33% dual aspect in central and accessible locations. SPPR 4 requires a minimum of 50% dual aspect apartments in suburban or intermediate locations.	✓ 52.4% of the proposed apartments and duplex units are dual aspect. ✓ This exceeds the minimum of 50% dual aspect for suburban locations.
Floor to Ceiling Height	Section 3.21 requires that minimum ceiling heights accord with the Building Regulations (i.e. 2.4m). Section 3.22 suggests increasing the minimum floor height to 2.7m and requires that the ground floor ceiling heights shall be a minimum of 2.7m. SPPR 5 requites that ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances to facilities a future change of use to commercial use.	✓ All apartments have a floor to ceiling height ranging from 2.4 m to 3.2m. Ground floor ceiling heights are 2.9 m.
Internal Storage	Section 3.31 states that provision should be made for storage and utility (additional to kitchen/bedroom furniture), specifically for household utility functions such as clothes washing and the storage of bulky personal or household items. However, as a rule, no individual storage rooms within an apartment should exceed 3.5sqm. Appendix 1 provides the following minimum standards for storage space. ▪ Studio: 3 sqm ▪ 1 bed: 3 sqm ▪ 2 bed (3 person): 5 sqm ▪ 2 bed (4 person): 6 sqm ▪ 3 bed: 9 sqm	✓ The storage space of the proposed apartments has been provided in line with these standards.

Private Amenity Space	Section 3.35 requires that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments. Appendix 1 provides the following minimum standards for private amenity space. ▪ Studio: 4 sqm ▪ 1 bed: 5 sqm ▪ 2 bed (3 person): 6 sqm ▪ 2 bed (4 person): 7 sqm ▪ 3 bed: 9 sqm	✓ The private amenity space of the proposed apartments and duplexes have been provided in line with these standards.
Security Considerations	Section 3.40 states that apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings.	✓ The layout and orientation of the proposed blocks and streets will ensure that the public realm and open spaces are overlooked by the surrounding dwellings, ensuring passive surveillance and a strong sense of safety is provided.
Access and Services	Section 4.1 requires apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations:	✓ The proposed units have all been designed in line with Part M of the building regulations.
Refuse Storage	Section 4.8 requires that provision shall be made for the appropriate storage and collection of waste materials in apartment schemes. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage. Section 4.9 outlines the following general design considerations: ▪ Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;	✓ Please see the Waste Management Plan by DOSA Engineers for details on the proposed waste management.

	▪ In larger apartment schemes, consideration should also be given to the provision of separate collection facilities for other recyclables such as glass and plastics; ▪ Waste storage areas must be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies; ▪ Provision in the layout for sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people; ▪ Waste storage areas should not present any safety risks to users and should be well-lit; ▪ Waste storage areas should not be on the public street, and should not be visible to or accessible by the general public. ▪ Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles; ▪ The capacity for washing down waste storage areas, with wastewater discharging to the sewer.	
Communal Amenity Facilities	Section 4.10 states that the provision and proper future maintenance of well designed communal amenity spaces will contribute to meeting the amenity needs of residents. Section 4.11 requires that the heights and orientation of blocks adjoining a communal open space must permit adequate levels of sunlight to reach the communal amenity space throughout the year. Appendix 1 provides the following minimum standards for communal amenity space:	✓ The proposed development includes 828.5sqm communal open space which is in line with these minimum standards.

	▪ Studio: 4 sqm ▪ 1 bed: 5 sqm ▪ 2 bed (3 person): 6 sqm ▪ 2 bed (4 person): 7 sqm ▪ 3 bed: 9 sqm	
Children's Play	Section 4.13 requires that the recreational needs of children must be considered as part of communal amenity space within apartment schemes.	✓ The proposed communal open space will cater for a range of users.
Childcare	Section 4.7 states that one bedroom and studio apartment units should not generally be considered for calculating childcare provision requirements.	✓ The proposal includes 74 no. units when one beds are excluded and a creche would not be required. ✓ The development is proposed for rightsizing.
Bicycle Parking	Section 4.16 requires cycling to be fully integrated into the design and operation of all new apartment development schemes. Section 4.17 provides the following requirements for bicycle provision: ▪ Location – bicycle parking should be conveniently accessible to residents, both in terms of proximity to access points to apartments and routes to the external road/street network ▪ Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cyle parking shall be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority ▪ Design – cycle parking shall be provided in a dedicated facility of permanent construction.	✓ The proposed cycle parking has been fully integrated into the design of the scheme with bicycle parking provided throughout the development. ✓ The proposal provides a total of 274 no. cycle parking spaces for the proposed 124 no. apartment units. This is considered an more than an adequate provision. ✓ The proposed cycle parking spaces are located in secure locations within a short distance of the proposed apartment units ensuring that the spaces are easily accessible to the residents. ✓ The cycle parking will be managed by the management company.

	▪ Management – cycle parking shall be the subject of a funded maintenance regime that ensures that facilities are kept clean.	
Car Parking	Section 4.20 notes that the quantum of car parking will vary having regard to the types of locations. Section 4.24 notes that for apartments in less accessible urban location one car parking space per unit and one visitor space for every 3-4 apartments should be required.	✓ Based on this standard, the proposed 124 no. apartments would require 135 no. car parking spaces. ✓ The proposal provides a total of 26 no. car parking spaces.

2.6 Urban Development and Building Heights Guidelines for Planning Authorities, 2018

The Urban Development and Building Heights Guidelines were released in 2018 in response to the publication of the National Planning Framework. Section 1.4 notes that local authorities often set generic maximum building height limits which can undermine wider national policy objectives to provide more compact forms of urban development in line with the NPF. The Guidelines therefore outline wider and strategic policy considerations and a more performance criteria driven approach for the assessment of building heights. The Guidelines outline Specific Planning Policy Requirements (SPPRs) and development management criteria to guide development of increased building heights. The proposed development is assessed against these policies and criteria in the table below.

Reference	Relevant Policy	Statement of Consistency
SPPR 1	In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.	✓ The subject site is located in a central location, south of Douglas town centre. The proposed heights are in line with the Density and Building Heights assessment within the Sustainable Residential Development and Compact Settlement Guidelines 2024.
SPPR 2	In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans[2] could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.	✓ The proposed scheme comprises a mix of uses including café and office space, community space, and residential units. ✓ The proposal also includes public and communal open space to serve the social and recreational needs of the area.

Development Management Criteria **At the Scale of the Relevant City/Town**	▪ The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. ▪ Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. ▪ 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 subject site is a c. 5 minute walk from Douglas town centre and the closest bus stop. ✓ The proposal will have an overall positive contribution to place making with the creation of new streets, open spaces, and a high-density residential development.
Development Management Criteria **At the Scale of the District/ Neighbourhood / Street**	▪ The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. ▪ The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered. ▪ 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	✓ The proposal responds to its overall environment and makes a positive contribution to the area. ✓ The proposal avoids long uninterrupted walls of buildings. ✓ The proposal includes public open spaces including a pocket park and provides a connection and improved permeability between Old Carrigaline Road, and Churchyard Lane.

	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 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 proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood	✓ The introduction of the permeable development and amenity walkway will improve the legibility of the area. ✓ The site is not within a potential flood zone and does not have any history of flooding, the site is within the defenced area of the Douglas Flood Relief Scheme and a FRA has been prepared by Arup as part of this application. ✓ The proposal provides a mix of uses and typologies which will make a positive contribution to the area.
Development Management Criteria **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. ▪ 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	✓ The proposed layout has been designed to ensure that the proposed units and open spaces have sufficient daylight and sunlight and that the existing adjacent dwellings are not adversely affected. ✓ DKP completed a daylight sunlight report which assessed all the proposed rooms, amenity spaces, and existing dwellings. ✓ This daylight report concluded that all proposed open spaces are in line the BRE recommendation for sunlight, and that 50% of the proposed units exceed the minimum recommendation for sunlight. In addition, all units meet or exceeds the minimum recommendations for internal daylight provision.

	achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	✓ The report also found that the proposed development will have a negligible impact on skylight to the neighbouring dwellings.
Development Management Criteria **Specific Assessments**	Support proposals at some or all of these scales, specific assessments may be required and these may include: ▪ 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. ▪ 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. ▪ An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. ▪ An assessment that the proposal maintains safe air navigation. ▪ An urban design statement including, as appropriate, impact on the historic built environment. ▪ Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	✓ The proposal is not located close to an airport or aerodrome and therefore an assessment of the impact on air navigation was not required. ✓ A Design Statement has been prepared by OMP Architecture and an Architectural Heritage Impact Assessment has been prepared by John Cronin & Associates. ✓ An Ecological Impact Assessment and AA Screening has been completed for the LRD application by Limosa Environmental.
SPPR 3	It is a specific planning policy requirement that where;	✓ As seen above, the proposal complies with the development management criteria.

	(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise. (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.	
SPPR 4	It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and3. avoid mono-type building typologies (e.g. two storey or	✓ The proposed development includes heights of 1 to 5 storeys. The 5 storey buildings are located strategically within the development to provide focal points and identifiable locations within the schemes.

	own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.	

2.7 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy (RSES) for the Southern Region came into effect on 31st January 2020. The RSES provides "a long-term regional level strategic planning and economic framework, in support of the implementation of the National Planning Framework, for the future physical, economic and social developments for the Southern Region". The Regional Spatial and Economic Strategy for the Southern Region 2020 (RSES) translates the NPF objectives to the regional level.

Reference	Relevant Policy/Principle/Guideline	Statement of Consistency
RPO 4	Increased population growth should be planned having regard to environmental criteria including: ▪ The assimilative capacity of the receiving environment. ▪ The proximity of European Sites and the potential for impact on the conservation objectives and qualifying interests.	✓ The proposal will provide an additional 124 no. units and a mixed-use element on the ground floor on this site in Douglas, which is in line with the zoning objective for the site and the expected population growth in Douglas. ✓ An AA Screening has been prepared for the LRD application by Limosa Environmental.
RPO 9	▪ Holistic approach to delivering infrastructure. ▪ Ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritises the delivery of compact growth and sustainable mobility in accordance with NPF objectives to include the following: ▪ Water services, digital, green infrastructure, transport and sustainable travel, community and social renewable energy, recreation, open space amenity, climate change, adaptation and future proofing infrastructure including	✓ The proposal will provide a high-density development on this zoned site within Douglas. It will allow for the compact growth of Douglas in line with national, regional, and local planning policy. ✓ The proposal includes all required infrastructure.

Reference	Relevant Policy/Principle/Guideline	Statement of Consistency
	Flood Risk management measures, environmental improvement, arts, culture and public realm.	
RPO 10	▪ Compact Growth in Metropolitan Areas. ▪ The prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, waling and cycling. ▪ The identification of Transformational Areas which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas.	✓ The proposal will provide 124 no. new homes within the existing settlement area of Douglas. It will also provide open spaces, a cafe, and office space, to ensure amenities and facilities are within a 15-minute walk of people's homes. ✓ Douglas Village Shopping Centre is only a 3-minute walk from the site, while Douglas Court Shopping Centre is a 10 minute walk, which provides further facilities and amenities.

3. Local Planning Policy

This section assesses the proposed development against the following local policy documents:

- Cork Metropolitan Area Transport Strategy (CMATS) 2040.
- Cork City Development Plan 2022-2028

3.1 Cork Metropolitan Area Transport Strategy (CMATS) 2040

The Cork Metropolitan Area Transport Strategy (CMATS) 2040, which was published in February 2020, was included as an objective in Cork MASP Policy (Objective 7) of the RSES and identified as one of the Guiding Principles of the Cork MASP. CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area. It sets out a framework for the planning and delivery of transport infrastructure and services to support the Cork Metropolitan Area development in the period up to 2040.

Relevant Policy / Principle / Guideline	Statement of Consistency
Key outcomes for walking in the Strategy include: ▪ An increase in walking levels for work, education and leisure across the CMA, particularly for short journeys (less than 2-3km); ▪ Addressing the safety issues and barriers that prevent citizens and visitors from walking more in Cork; ▪ Supporting a high quality and fully accessible environment for all abilities and ages by continuing to develop a safe, legible and attractive public realm; ▪ Facilitate walking's role as part of linked trips, particularly with rail and bus journey; and ▪ Promote a far higher standard of urban design in new developments, and in highway design, in a fashion that consistently prioritises pedestrian movement and safety over that of the private car.	✓ The proposal includes high-quality public realm and routes that will create a pleasant and attractive place for pedestrians and cyclists to travel through the site. ✓ The provision of attractive and safe walking routes will help encourage people to walk throughout the scheme and to walk throughout the wider area. ✓ The schemes has been designed to prioritise walking and cycling over the use of the private car.

Relevant Policy / Principle / Guideline	Statement of Consistency
The provision of LRT system will be a focal point to enable the growth of population, employment health and education uses as envisaged by the NPF 2040, The LRT system is a key enabler in CMATS. The LRT is required to: ▪ Unlock strategic development areas in its catchment areas including the Cork City Docks, Curraheen, Ballincollig and Mahon; ▪ Maximise the development of potential windfall sites; ▪ Provide greater certainty for future Planning and Development, to pursue higher densities required to meet NPF population and employment targets for Cork City; ▪ Enable car-free and low car development within its catchment in line with recent changes to government policy outlined in the NPF and Sustainable Apartment guidelines; ▪ Reduce reliance on the N40 in particular, for short trips within the Metropolitan Area.	✓ The proposal has been designed to minimise the presence of the private car and encourage walking and cycling as a mode of transport.
Greenway Cycle Network Greenway networks comprise of traffic free or low-trafficked routes and typically comprise of re-purposed derelict railway lines, routes through parks or alongside rivers. Access to greenways can be supported through filtered permeability from residential or other built-up areas. Some key indicative areas for greenways* include: ▪ A proposed east-west 'Lee to Sea' greenway incorporating the Lee Fields, city quays, the Marina and the Old Passage railway line; ▪ A Greenway linking City-Tivoli-Douglas Little Island- Carrigtwohill and Midleton (Part of the EuroVelo 1 route) with a potential extension to Youghal via the old railway line; ▪ A route following the Tramore River including Douglas, Tramore Valley Park and Togher; ▪ Passage West to Carrigaline;	✓ The proposal includes a pedestrian connection between Old Carrigaline Road and Churchyard Lane and provides an attractive and safe route for pedestrians and cyclists throughout the area.

Relevant Policy / Principle / Guideline	Statement of Consistency
▪ Curraheen River Greenway; ▪ Old Bandon/Kinsale Railway incorporating the Chetwynd Viaduct (below); ▪ Blarney Greenway Route; ▪ A route between Carrigrohane Road and Tower; and ▪ Midleton-Ballinacurra- Whitegate ▪ Additional greenways and/inter-urban routes to those outlined above, may be investigated subject to changes in the proposed population and employment distribution as part of the proposed periodical 5 year CMATS review.	
Supporting Radial Bus Services In order to ensure comprehensive network coverage, additional supporting radial bus services will be developed. These supporting services typically have lower frequencies than the Core Radial Bus Network but cater for a wider catchment across the Metropolitan Area. The radial bus services will provide further opportunities for interchange to Suburban Rail, Light Rail and other bus services on the Core Bus Network. The proposed radial bus routes, and indicative frequencies, are as follows: ▪ Douglas – City Centre: 20-minute frequency; ▪ Cork Airport – Kent Station: 20-minute frequency; ▪ Pouladuff – City Centre: 30-minute frequency; ▪ Apple campus – City Centre: 30-minute frequency; ▪ Ringaskiddy – Passage West – City Centre: 20-minute frequency; ▪ Ringaskiddy – Carrigaline – City Centre: 20 min minute frequency; and ▪ Midleton – City Centre: 10-minute frequency	✓ The proposal will increase the population of Douglas, supporting this aim for improved bus services from Douglas to the city centre.

3.2 Cork City Development Plan 2022-2028

The Cork City Development Plan 2022-2028 was adopted in June 2022 and came into effect in August 2022. The table below provides an assessment of the proposed development against the relevant policies and objectives.

Chapter	Policy	Policy Provision	Statement of Consistency
Chapter 2 **Core Strategy**	Objective 2.10 The 15 Minute City	To support the delivery of a 15-Minute City that supports Compact Liveable Growth by creating vibrant local communities that can access all necessary amenities within a 10-minute walk/cycle and access workplaces and other neighbourhoods with a 15-minute public transport journey. Implementation will include walkable neighbourhoods, towns and communities with mix of uses, house types and tenure that foster a diverse, resilient, socially inclusive and responsive city. This includes support for public and active travel infrastructure projects and services and enhanced neighbourhood permeability. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability and accessibility.	✓ The proposed development has been designed in line with the principles of a 15-minute city. ✓ The subject site is under a 5-minute cycle or 5-minute walk from Douglas town centre and Douglas Village Shopping Centre is only a 3 minute walk from the site, while Douglas Court Shopping Centre is a 10 minute walk, which provides a range of uses. ✓ In recognition of the fact that not everyone is comfortable cycling, the proposal includes a neighbourhood centre with a café and office space, to cater for people within a 15-minute walk of the site.
Chapter 2 **Core Strategy**	Objective 2.12 Mix of Uses	Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.	✓ The proposed development includes a mix of uses that will enhance the immediate context and the wider area of

			Douglas by ensuring the everyday needs of the population are met within a short distance from their homes.
Chapter 2 **Core Strategy**	Objective 2.13 Design Led City	Follow a design-led approach that delivers sustainable, high quality placemaking, urban regeneration and high-quality architecture in this context. Development shall contribute positively to the quality of the surrounding built and natural environment, health and wellbeing, and shall be planned and designed with reference to climate change mitigation and adaptation.	✓ The proposal has been designed by a multi-disciplinary team to ensure the delivery of a sustainable, high-quality scheme that makes a positive contribution to placemaking. ✓ The scheme includes climate change mitigation and adaption measures including the elimination of fossil fuel use in homes, the provision of EV charging points, and the creation of a 15 minute neighbourhood.
Chapter 2 **Core Strategy**	Objective 2.14 Walkable Neighbourhoods	New development shall be designed to make positive additions to their neighbourhoods, towns and communities by: a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces. b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character) with active streets and avoiding the creation of “dead” spaces.	✓ The proposed development will provide a mix of uses in high quality buildings. ✓ The proposal has been designed at a human scale with active streets and dead spaces avoided.

		c. Ensuring a child friendly and age friendly environment applying Universal Design principles with a mix of household types. d. Designing a safe place that enables access for all. e. Creating a healthy neighbourhood with increased urban greening and direct access to high quality parks and public spaces, schools, shops and local services. f. Being well-connected with easy access to public transport and active travel. g. Providing enhanced permeability for walking and cycling.	✓ Overall, the proposal will create an attractive, safe and vibrant place. ✓ The proposal has been designed in line universal design principles. Please see the statement prepared by OMP Architects for further detail. ✓ The proposal will provide high quality parks and green spaces. ✓ The proposal will provide a well-connected area with excellent permeability for walking and cycling.
Chapter 2 **Core Strategy**	Objective 2.16 Neighbourhood Mix	Promote high quality neighbourhoods by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities.	✓ The proposal includes a neighbourhood centre with a cafe, and an office space which will serve to increase the range of facilities available in the area.
Chapter 2 **Core Strategy**	Objective 2.31 Compact Growth	It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.	✓ The subject site is located with the existing built-up area of Douglas and therefore the proposal will help achieve the delivery of 65% new homes within the existing built-up footprint of the city.

Chapter 2 **Core Strategy**	Objective 2.32 Housing Supply	Support an increase in the supply, affordability and quality of new housing in the city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built, while also achieving an efficient use of zoned and serviced land.	✓ The proposed 124 no. homes will increase the supply of housing in the city and increase the range of housing options available. ✓ The proposal achieves an efficient use of zoned and serviced land.
Chapter 3 **Delivering Homes and Communities**	Objective 3.1 Planning for Sustainable Neighbourhoods	Cork City Council will seek to: a. Utilise the Urban Towns, Hinterland Villages and City Neighbourhoods as spatial units to develop sustainable neighbourhoods, employing the 15-Minute City concept; b. Require development proposals to put placemaking at the heart of their design concept and clearly demonstrate how neighbourhood integration, health and wellbeing and enhancement is central to this; c. Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide', Universal Design principles and any updates; d. Ensure that an appropriate level of supporting neighbourhood infrastructure is provided in conjunction with, and as an integral component of, residential development in New Sustainable Neighbourhoods; e. Undertake a Cork City Neighbourhoods Strategy during the lifetime of the Plan to identify strategic gaps in the provision of	✓ The proposed development will support the continued growth of Douglas, in line with the principle of a 15-minute city. ✓ Placemaking is at the heart of this scheme which provides a neighbourhood centre, public open space and a pedestrian connection between Old Carrigaline Road and Churchyard Lane. ✓ The proposal has been designed in accordance with the universal design principles. Please see the statement prepared by OMP Architects ✓ The proposal includes a neighbourhood centre to support both the proposed

		services / infrastructure / resources within existing and proposed neighbourhoods; f. Create healthy and attractive places to live consistent with NPO 4 of the NPF and Goal 3: Sustainable Place Framework of the RSES.	development, the wider surrounding area. ✓ Overall, the proposal will create a healthy and attractive place to live.
Chapter 3 **Delivering Homes and Communities**	Objective 3.2 A Diverse, Inclusive and Equal City	Cork City Council will seek to ensure that Cork is an inclusive City and meets the needs of all by: a. Providing a land use planning system that ensures an appropriate distribution of land uses, infrastructure and services to give equal access to all residents to live, work, educate, recreate and avail of other services in terms of range and quality; b. Consciously considering specific population groups in the design of neighbourhoods, places, buildings, streets and spaces to meet the needs of all citizens; c. Consciously considering specific population groups in the development of planning policy, strategies and frameworks with an emphasis on young people, old people and people with disabilities; d. Promoting measures that reduce concentrations of social inequality between neighbourhoods.	✓ The proposed development includes apartments of 1 to 3 bed units which will add variety to the existing housing stock in the area. ✓ The proposal includes a café with outdoor seating and an office space which will serve the area. ✓ The proposal also includes a pedestrian connection through the site, connecting Old Carrigaline Road and Churchyard Lane providing a safe and attractive route through the area for pedestrians and cyclists.
Chapter 3 **Delivering Homes and Communities**	Objective 3.3 New Housing Supply	Provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period. This will be achieved by: a. Zoning sufficient lands for residential or a mix of residential and other uses to facilitate the delivery of housing; g. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods and	✓ The proposal includes the provision of 124 no. residential units on this mixed-use zoned land. ✓ The proposal will contribute to the creation of a successful neighbourhood with the

		are designed to the highest standards (see Chapter 11: Placemaking and Managing Development).	provision of a café, shared office space, and public open spaces.
Chapter 3 **Delivering Homes and Communities**	Objective 3.4 Compact Growth	Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork. Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by: b. Progress housing and employment delivery in urban centres and strategic regeneration sites; g. Optimising the use of land (see Objective 3.5: Residential Density) h. Establishing ambitious and achievable buildout rates at the planning stage to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value; i. Influencing Government to update the legislative, guidance, fiscal and financial framework to the benefit of housing delivery on brownfield sites; j. Combining its role as planning authority and housing authority to bring about residential development to meet demand and need; m. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods;	✓ The proposed residential units will be located in Douglas, on lands zoned for mixed use which includes residential development. The lands are within a built-up area of Douglas, and therefore developing this site is the next logical proposal for the town of Douglas. ✓ The use of the land has been optimised with a net density of 153.7 uph in addition to a café and a shared office spaces.

		o. Encouraging the retrofitting and reuse of existing buildings, rather than their demolition and reconstruction	
Chapter 3 **Delivering Homes and Communities**	Objective 3.5 Residential Density	Cork City Council will seek to: a. Promote compact urban growth by encouraging higher densities throughout Cork City according to the Cork City Density Strategy, Building Height and Tall Building Study and resultant standards set out in Chapter 11: Placemaking and Managing Development and Mapped Objectives; and b. Ensure that urban density is achieved by development proposals providing for high quality sustainable residential development, ensure a balance between the protection of the established character of the surrounding area and existing residential amenities; c. Ensure that urban density is closely linked to creating successful neighbourhoods and ensuring that neighbourhoods are integrated and permeable to ensure short trips are possible to urban centres, local services and amenities; d. Ensuring high-quality architectural, urban and public realm design. Guidance is set out in Chapter 11: Placemaking and Managing Development.	✓ The proposal will provide a high-density development of 153.7 units per hectare with building heights up to 5 storeys which is considered appropriate for the location in the outer suburb of Douglas. ✓ The proposed density and heights have been achieved while also protecting the residential amenity of the existing dwellings to the east and the amenity of the two graveyards to the south. ✓ The proposal includes a commercial aspect which will serve both the proposed residential units and the wider Douglas town centre and will provide services and amenities within a short walking distance of people's home.
Chapter 3	Objective 3.6 Housing Mix	Cork City Council will seek to: a. Implement the provisions of the Joint Housing Strategy and HNDA as far as they relate to Cork City;	✓ The proposal includes a mix of 1, 2 and 3 bed apartments. This mix of unit types and sizes will cater to a range of

Delivering Homes and Communities		b. Encourage the development of an appropriate mix of dwelling types to meet target residential densities, utilising a range of dwelling types and density typologies informed by best practice (as illustrated in "Density Done Well" in the Cork City Density Strategy, Building Height and Tall Building Strategy) with combinations of houses, stacked units and apartments; c. Within all new residential developments it will be necessary to ensure an appropriate balance of housing tenure and dwelling size to sustain balanced and inclusive communities, including a balance of familysized units and smaller dwellings tailored to suit the location (please refer to Chapter 11: Placemaking and Managing Development for those standards); d. Deliver at least 20% below-market priced housing across Cork City and ideally within each new residential neighbourhood; e. Encourage the provision of housing for one and two person households in all neighbourhoods to meet the needs of all age groups, including providing for downsizing to release family housing units; f. Update Development Plan policy as necessary to reflect emerging national guidance with regard to housing standards.	households and will add to the housing supply in the area and help create a balanced and sustainable community. ✓ The proposal includes 20% Part V units.
Chapter 3 **Delivering Homes and Communities**	Objective 3.14 Community Infrastructure and Services	To work with our communities and infrastructure providers in facilitating the development and provision of a range of accessible, socially inclusive, multi-functional and diverse community facilities throughout the City.	✓ The proposal includes a cafe, shared office space which will help create a community hub to serve the surrounding area.
Chapter 3	Objective 3.17 Community Hubs	To promote the co-location and sharing of community, enterprise, recreation and open space infrastructure to create community hubs of scale at locations that can be accessed by walking, cycling	

Delivering Homes and Communities		and public transport and subject to there being no significant adverse impacts on local amenity	
Chapter 3 **Delivering Homes and Communities**	Objective 3.18 Adaptable Community Facilities	To support provision of community facilities that are multi-functional and sufficiently adaptable, to cater for a variety of uses now and in the future as needs change.	✓ The community space provided can be adapted to cater for a variety of uses and users.
Chapter 3 **Delivering Homes and Communities**	Objective 3.20 Cork City as a Child-Friendly City	To promote Cork as a child-friendly city by considering the design needs of young people in terms of appropriate design when changes are proposed to the built environment. All development must consider the Universal Design approach.	✓ The proposal has been designed in accordance with the universal design principles.
Chapter 3 **Delivering Homes and Communities**	Objective 3.21 Childcare Facilities	To support the provision and expansion of high-quality childcare facilities throughout the city. The Council will: a. Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered; b. Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed; c. Require employers with more than 500 members of staff to provide childcare facilities as part of planning applications for significant new and extended development.	The proposed development will be for rightsizing and will not result in large numbers of families with children. When excluding the 1 bed units, the development provides 74 units which does not require a childcare facility in line with the guidelines.
Chapter 3	Objective 3.29	a. To finalise the Cork City Active Recreation Infrastructure Study to guide the implementation of this policy objective and other related objectives in the wider Plan;	✓ The proposal includes a pedestrian and cycling connection will be provided through the site connecting

Delivering Homes and Communities	Neighbourhood Recreation and Amenity	b. To support and facilitate the development of outdoor and indoor recreational facilities, play facilities and services to cater for all-age groups and people of all abilities on suitable sites; c. To support the clustering of recreational facilities, particularly in locations that are well served by walking, cycling and public transport; d. To promote more multi-functional facilities such as Multiple Games Areas (MUGAs) and multi-use internal courts/halls where there is a deficit in existing facilities across a range of sports/active recreation uses. This does not imply a relaxation of the open space standards for new development proposals; e. To support the provision of formal and informal play areas with appropriate equipment and where possible, incorporating nature-based play equipment and layouts. These, where practical, should seek to appeal to a range of age cohorts through their layout and equipment; f. To discourage the redevelopment of recreational facilities to alternative, non-community uses unless it can be demonstrated there is suitable and accessible (by walking, cycling and public transport) alternative provision elsewhere with sufficient capacity to compensate for the loss of the facility.	Old Carrigaline Road and Churchyard Lane through the site. ✓ The proposal also includes the provision of public pocket park, open spaces and a commercial aspect.
Chapter 3 **Delivering Homes and Communities**	Objective 3.35 Safe and Secure City	a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas;	✓ The proposed layout ensures all streets and public open spaces will be overlooked and provided with passive surveillance. This will help create a safe environment for all users.

		b. To encourage buildings and spaces to be designed with safety and security in mind to avoid anti-social behaviour, reduce and prevent crime and create safe places for all; c. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.	✓ The proposal has been designed with safety and security in mind.
Chapter 4 **Transport and Mobility**	Strategic Objective 3 Transport and Mobility	Proposals for new development in Cork City will be required to minimise the need for the private car, prioritise walking, cycling and public transport, be permeable, safe and secure for walking and cycling and where possible provide for filtered permeability. New developments will provide infrastructure for Electric Vehicles within the developments. Development proposals will provide for easy access to local amenities and education facilities. Proposals for new development will be required to demonstrate their impact on the existing transport networks, commensurate with the nature and scale of the development. Mobility management plans will be required for developments that will accommodate a large number of people living, working or otherwise using the development. All new development proposals will be subject to maximum car parking standards to achieve greater modal shift and promote sustainable transport patterns.	✓ The proposal has been designed to minimise the need for the private car and has provided attractive and pleasant spaces for pedestrians. ✓ The impact on the existing transport network has been assessed by MHL Consulting Engineers within the Traffic and Transport Assessment. ✓ The number of car parking spaces provided is below the maximum standards which will help encourage a modal shift towards more sustainable modes of transport.
Chapter 4 **Transport and Mobility**	Objective 4.3 Strategic Location of New Development	To ensure that all new residential, employment and commercial development are focused in areas with good access to the planned high frequency public transport network.	✓ The proposed development is located in Douglas, to the south of the town centre and a less than 5-minute walk from Douglas centre.

			✓ Douglas Village Shopping Centre is only a 3 minute walk from the site, while Douglas Court Shopping Centre is a 10 minute walk. ✓ The subject site is in close proximity to a number of bus stops, with the nearest service route located on East Douglas Street, served by the 216, 220(X) and 223(X) buses, all of which connect Douglas to Cork City and a selection of suburbs. Frequency of the bus routes range from 15 minutes, to hourly.
Chapter 4 **Transport and Mobility**	Objective 4.4 Active Travel	To actively promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient, and safe cycle routes and footpaths across the city. To support the 15-minute city concept and walkable neighbourhoods with adequate walking and cycling infrastructure connected to high-quality public realm elements, including wayfinding and supporting amenities (benches, water fountains, bike stands). To support the expansion of the Cork Bikes scheme. To accommodate other innovations such as electric bikes, public car hire, and other solutions that will encourage active travel. To	✓ The proposed development includes safe and direct pathways for pedestrians and cyclists through the site connecting Old Carrigaline Road and Churchyard Lane. ✓ The proposal includes facilities and amenities to support the future increased population in the area which supports the 15 minute city concept.

		support the rollout of the NTA 5 Year Cycle Plan. To support and engage with the Safe Routes to School programme.	
Chapter 4 **Transport and Mobility**	Objective 4.5 Permeability	a. All new development, particularly alongside the possible routes identified for public transport improvements, shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility. b. To maximise permeability, safety, security and connectivity for pedestrians and cyclists by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed. c. Prepare a permeability strategy for areas throughout the city.	✓ The proposed development provides a highly permeable scheme with streets and pathways for pedestrians provided throughout. ✓ The pathways through the open space provide direct links to the adjacent roads. ✓ All pathways for pedestrians and cyclists are overlooked which will ensure a high level of safety and security.
Chapter 5 **Climate Change and the Environment**	Strategic Objective 4 Climate and Environment	To support transition to a low-carbon, climate-resilient and environmentally sustainable future. To support the circular economy. Proposals for new development in Cork City will strive to reduce carbon footprints by carbon emission reductions, sustainable energy consumption, sustainable transport, use of renewable energy sources, green construction methods including passive solar design, and flood risk mitigation and adaptation and use of nature-based solutions, through design, layout, implementation and operation. A statement commensurate with the nature and scale of the development proposal will be required to accompany planning applications demonstrating how climate resilience has been	✓ Please see the Sustainability Energy Statement prepared by MBA and submitted with this LRD.

		considered and implemented at all stages in the development process.	
Chapter 5 **Climate Change and the Environment**	Objective 5.10 Energy Conservation and Efficiency	To support and help create high levels of energy conservation and energy efficiency in both new and existing buildings.	✓ The proposed buildings and residential units will all be designed to nZEB standards.
Chapter 5 **Climate Change and the Environment**	Objective 5.11 Energy Efficiency Considerations	New development proposals are expected to maximise energy efficiency through location, siting, orientation, layout, design, stormwater drainage and landscaping. This includes seeking to optimise energy efficiency through thermal insulation, passive ventilation and cooling and passive solar design.	✓ The proposed layout has been designed to optimise energy efficiency. ✓ The proposed residential units will all achieve sufficient daylight standards in line with BRE recommendations.
Chapter 5 **Climate Change and the Environment**	Objective 5.12 Energy Use Management	Development proposals are encouraged to incorporate best practice in technologies that help reduce energy use or enables the monitoring and management of energy use.	✓ The proposal has been designed to reduce energy use where possible. In addition, fossil fuel use has been eliminated.
Chapter 5 **Climate Change and the Environment**	Objective 5.13 Waste Management – Construction and Operation of Development	All development proposals should minimise waste and maximise the recycling and re-use opportunities during the construction and operation phases	✓ Please see the waste management plan from DOSA Engineers.
Chapter 5	Objective 5.14 Adaptable Design	To encourage the incorporation of adaptable design into all new all developments to facilitate their adaptation to alternative use, layout or user requirements in the future if required	✓ The internal layout of all the proposed residential units

Climate Change and the Environment			can be adapted to suit the needs of the future residents.
Chapter 5 **Climate Change and the Environment**	Objective 5.16 Renewable and Low Carbon Energy	To encourage development proposals to consider use of renewable energy infrastructure from the project inception stage with planning applications for larger development schemes required to demonstrate how renewable energy infrastructure have been considered through Scheme Sustainability Statements (See Scheme Sustainability Statements in Chapter 11 Placemaking and Managing Development).	✓ Renewable energy will be incorporated as part of the development.
Chapter 5 **Climate Change and the Environment**	Objective 5.17 Heat Pumps	To support the use of heat pumps in new build residential, commercial and public buildings taking into account amenity, conservation and heritage considerations	✓ The proposed units have all been designed to allow the provision of heat pumps.
Chapter 5 **Climate Change and the Environment**	Objective 5.18 Roof-Top Solar Photovoltaic/Thermal Panels	To support the incorporation of photovoltaic and/ or solar thermal collector panels for electricity generation/storage and water heating on new residential, commercial and public buildings taking into account amenity, glint and glare, conservation and heritage considerations.	✓ Photovoltaic and/or solar thermal collector panels can be added to the proposed buildings at a later date.
Chapter 5 **Climate Change and the Environment**	Objective 5.22 Electric Vehicles	To encourage and support the use of Electric Vehicles (EV) and Light Electric Vehicles (LEV) and support the provision of charging infrastructure for EVs on-street, within carparks and in new developments.	✓ The proposal includes (as per TGD L 2022) Ducting Infrastructure which will be provided for every parking space in this development to enable the subsequent installation of recharging points for electric vehicles.

			This will promote sustainable transport.
Chapter 5 **Climate Change and the Environment**	Objective 5.24 Green and Blue Infrastructure	a. To support the strategic role that Green and Blue Infrastructure plays in facilitating a more climate resilient city. b. All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme. c. To support communities in the development of local scale Green and Blue Infrastructure projects	✓ Please see the reports and drawings prepared by DOSA Engineering Consultants, CSR Landscaping and OMP Architects for detail on the green and blue infrastructure.
Chapter 6 **Green and Blue Infrastructure, Open Space and Biodiversity**	Strategic Objective 5 Green and Blue Infrastructure, Open Space and Biodiversity	Proposals for new development in Cork City will respect and reflect the topography, landscape and ecology of the City, and will protect and enhance the City's green and blue infrastructure by ensuring that development does not fragment existing networks of green and blue infrastructure. Proposals for new development will demonstrate how green and blue infrastructure, open space, sport and recreation, landscape and biodiversity are considered commensurate to the scale and context of the development in the development process. Large-scale developments will incorporate open spaces to contribute to the green and blue infrastructure in the City.	✓ Please see the reports and drawings prepared by DOSA Engineering Consultants, CSR Landscape Architects and OMP Architects for detail on the green and blue infrastructure.
Chapter 7 **Employment and Enterprise**	Strategic Objective 6 Employment and Enterprise	Development proposals will be supported in appropriate locations across Cork City in accordance with the retail and employment strategies set out in this Plan.	✓ The proposed commercial aspect will provide local retail needs within a short walking distance of the proposed and recently completed homes. This will support the creation

			of the 15 minute neighbourhood.
Chapter 7 Employment and Enterprise	Objective 7.31 Neighbourhood and Local Centres	To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. It is also aimed to support and facilitate the designation of new Neighbourhood and Local Centres where significant additional population growth is planned or where a demonstrable gap in existing provision is identified, subject to the protection of residential amenities of the surrounding area and that they are adequately served by sustainable transport. Proposals should demonstrate the appropriateness of the site by means of a Sequential Test, demonstrate retail impact and provide for a mix of uses appropriate to the scale of the centre	✓ The proposed neighbourhood centre will serve the new population that is expected from the proposal.
Chapter 7 Employment and Enterprise	Objective 7.32 Local Shops	To support, promote and protect small local shops including corner shops which provide an important retail service at a local level. Any proposed new local shops should serve a local need only and be of a size and scale which would not be detrimental to the health of nearby centres defined within the retail hierarchy and subject to the protection of residential amenity.	✓ The proposed commercial space will serve a local need only and is not of a scale to serve a larger catchment area.
Chapter 7 Employment and Enterprise	Objective 7.34 Retail Impact Assessments	All significant retail planning applications must be supported by a comprehensive Retail Impact Assessment as outlined in the Retail Planning Guidelines (2012). Cork City Council will determine the requirement to submit a Retail Impact Assessment prior to or during the determination of an application.	✓ The proposal includes a total of 396.1 sqm commercial space comprising of Café and Office uses.
Chapter8	Objective 8.23	Development in Architectural Conservation Areas should have regard to the following:	✓ The site is located within the Douglas Donnybrook ACA: Sub Area B

Heritage Arts and Culture	Development in Architectural Conservation Areas	a. Works that impact negatively upon features within the public realm, such as stone setts, cobbles or other historic paving, railings, street furniture, stone kerbing etc. shall not be generally permitted; b. Design and detailing that responds respectfully to the historic environment in a way that contributes new values from our own time. This can be achieved by considering layout, scale, materials and finishes and patterns such as plot divisions in the surrounding area; c. Historic materials and methods of construction should be retained and repaired where this is reasonable, e.g. historic windows and doors, original roof coverings, metal rainwater goods should be retained along with original forms and locations of openings etc; d. Repairs or the addition of new materials should be appropriate and in keeping with the character of the original structures.	✓ The submitted verified photomontages demonstrate that the scale of development will not have a negative impact on the village core and the former constabulary barracks. ✓ The proposed development responds to the ACA.
Chapter 9 **Environmental Infrastructure**	Objective 9.1 Irish Water	a. To work with Irish Water to ensure the efficient and sustainable use and development of water resources and water services infrastructure in the City. b. To work with Irish Water to identify and facilitate the timely delivery of water and wastewater projects in order to facilitate development in accordance with the Core Strategy. c. To work with Irish Water in promoting water conservation and demand management measures among users and support the implementation of measures such as leakage reduction and network improvements.	✓ DOSA Engineering Consultants have engaged with Uisce Éireann as part of the preparation of this pre planning LRD application.

		d. To support Irish Water in the development and implementation of the National Water Resources Plan and Drinking Water Safety Plans. e. To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.	
Chapter 9 **Environmental Infrastructure**	Objective 9.2 Waste Water	a. To require all new proposals for development to provide a separate foul and surface water drainage system and to incorporate Sustainable Urban Drainage Systems in so far as practical. b. As part of new proposals for development, evidence of consultation with Irish Water should be submitted as part of a planning application, demonstrating that adequate water services are available to service the development and that existing water services will not be negatively impacted.	✓ The proposal includes a separate foul and surface water drainage system and incorporates SuDS features as much as possible. ✓ Please see the detailed drainage information prepared by DOSA and submitted with this application. ✓ Please see Uisce Éireann Confirmation of Feasibility Letter submitted as part of DOSA's pack with this application.
Chapter 9 **Environmental Infrastructure**	Objective 9.4 Sustainable Urban Drainage Systems (SUDS)	a. To require that all planning applications for new development incorporate Sustainable Urban Drainage Systems (SUDS) in so far as possible. Such proposals shall be accompanied by a comprehensive SUDS assessment including run-off quantity, run off quality and impacts on habitat and water quality. b. To encourage the provision of green roofs and green walls as an integrated part of Sustainable Urban Drainage Systems (SUDS) and which provide benefits for biodiversity, wherever feasible. c. To investigate the feasibility of preparing Sustainable Urban Drainage Systems (SUDS) guidelines for Cork City during the lifetime of the plan. In the interim The Department of Housing,	

		Local Government and Heritage document: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design - Best Practice Interim Guidance Document, will provide guidance in this regard.	
Chapter 9 **Environmental Infrastructure**	Objective 9.5 Discharging	a. To ensure that onsite petrol/oil interceptors and silt traps shall be installed to all significant road projects/upgrades or for proposals where surface water otherwise discharges to watercourses, to prevent hydrocarbon pollution of the receiving waters. b. To ensure that developments permitted by the Council which involve discharge of wastewater to surface waters or groundwaters, comply with the requirements of the EU Environmental Objectives (Surface Waters) Regulations and EU Environmental Objectives (Groundwater) Regulations.	✓ Please see the documents prepared by DOSA Consulting Engineers for details on drainage.
Chapter 9 **Environmental Infrastructure**	Objective 9.6 Storm Water	To provide adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure	✓ Please see the documents prepared by DOSA Consulting Engineers for details on drainage.
Chapter 10 **Key Growth Areas & Neighbourhood Development Sites**	Objective 10.69 South Douglas Expansion Area	To support the compact growth and development of South Douglas Expansion Area as a strategic City consolidation and expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a co-ordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.	✓ The proposal has been designed to integrate with the surrounding area and provide a mix of uses.
Chapter 10	Objective 10.82	To work in partnership with stakeholders in supporting and facilitating a more efficient and sustainable transport network for	✓ The proposal will provide a pedestrian and cycling

Key Growth Areas & Neighbourhood Development Sites	Douglas Sustainable Transport, Placemaking and Public Realm	Douglas that provides an improved public realm, reduces congestion, encourages greater levels of walking & cycling, and improves the quality of life for the community. This includes the sustainable transport measures set out in the Cork Metropolitan Area Transport Study (2020) and key projects including: i. Grange Road Transport Corridor & Tramore Valley N40 Bridge ii. South Douglas Road Junction Improvement Scheme iii. Clarke's Hill Improvements iv. Donnybrook Hill Pedestrian Upgrades v. Douglas to Grange Bridge b. To support placemaking and public realm improvements where development proposals are encouraged to optimise placemaking opportunities through high quality design and creating or contributing towards a multi-functional, inclusive public realm comprising streets and spaces that can accommodate a range of appropriate uses and activities which will assist in improving the attractiveness of Douglas and introducing greater levels of landscaping, public art, vitality and surveillance.	connection through the site between Old Carrigaline Road and Churchyard Lane, creating a strong sense of place and quality public realm that will be easily maintained.
Chapter 11 **Placemaking and Managing Development**	Objective 11.1 Sustainable Residential Development	Residential developments shall be sustainable and create high quality places which: a. Contribute to placemaking and to the 15-minute city and walkable neighbourhood concepts by planning for vibrant communities, with active streets, urban greening, versatile and creative use of spaces avoiding "dead" spaces; b. Prioritise walking, cycling and public transport, and minimise the need to use cars;	✓ Douglas Village Shopping Centre is only a 3 minute walk from the site, while Douglas Court Shopping Centre is a 10 minute walk from the proposed site. ✓ The proposal includes a mix of uses which will contribute to the creation of a 15 minute neighbourhood.

		c. Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience; d. Provide a good range of community and support facilities, where and when they are needed and that are easily accessible; e. Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained; f. Are easy to access for all and to find one's way around, with a focus on permeability within sites and integration and connectivity into the surrounding urban environment to enable short trips by walking and cycling; g. Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; h. Provide a mix of land uses to minimise transport demand; i. Promote social integration and provide accommodation for a diverse range of household types and age groups; j. Enhance and protect green and blue infrastructure and biodiversity; k. Enhance and protect the built and natural heritage.	✓ The provision of a mix of uses will help minimise transport demand and encourage people to walk/cycle within the development. ✓ The proposed development includes reduced car parking and increased cycle parking to help encourage a modal shift away from car dependency. ✓ The proposal will provide a pedestrian and cycling connection through the site between Old Carrigaline Road and Churchyard Lane through the site, creating a strong sense of place and quality public realm that will be easily maintained. ✓ The proposal includes a mix of one bed, two bed, and three bed units which will cater for a range of households. The proposed development is in favour of increased numbers of smaller units which will provide a more balanced housing mix within Douglas.

			✓ The scheme includes public open space and SuDS features to enhance and protect the green and blue infrastructure and biodiversity.
Chapter 11 **Placemaking and Managing Development**	Objective 11.2 Dwelling Size Mix	All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances. Applications for 10-50 dwellings will need to provide a dwelling size mix that benefits from the flexibility provided by the dwelling size target ranges provided for the respective sub-area.	✓ Table 11.8 provides minimum, maximum, and target percentages for the number of studios, one beds, two beds, three beds, and 4+ beds in urban towns and hinterland dwellings. ✓ The proposal includes 40.3% one bed units, 51.6% two bed units, 8.1% three bed units, and 0% 4 bed units. A dwelling mix has been submitted with this LRD.
Chapter 11 **Placemaking and Managing Development**	Objective 11.3 Housing Quality and Standards	a. High quality functional design: Housing developments should be of a high quality design and provide adequately sized rooms with comfortable and functional layouts, which are fit for purpose without differentiating between tenures; b. Housing quality: Qualitative aspects of development are key to ensuring successful sustainable housing. Table 11.10 sets out key qualitative aspects that should be addressed in the design of housing developments;	✓ The proposed residential units are all of an appropriate size which are comfortable and fit for purpose. ✓ The proposal is in line with the standards set out in Table 11.10. ✓ The proposal includes over 50% dual aspect units.

		c. Dual aspect dwellings: Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered to be a more appropriate design solution than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating; d. Daylight Sunlight and Overshadowing: The design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst, minimising overshadowing and maximising the useability of outdoor amenity space; e. Waste: Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables, food waste and residual waste; f. Minimum spatial standards: Housing developments are required to meet the minimum standards defined below	✓ DKP have completed a daylight and sunlight assessment of the proposal. Please see their report for details of the assessment. ✓ Appropriate waste and recycling storage facilities have been provided for all units. ✓ The proposed homes meet all minimum standards.
Chapter 11 **Placemaking and Managing Development**	Objective 11.4 Daylight Sunlight and Overshadowing (DSO)	All habitable rooms within new residential units shall have access to appropriate levels of natural / daylight and ventilation. Planning applications should be supported by a daylight and sunlight design strategy that sets out design objectives for the scheme itself and its context that should be included in the Design Statement. The potential impacts of the proposed development on the amenities enjoyed by adjoining properties will need to be assessed in relation to all major schemes and where separation distances are reduced below those stipulated. Cumulative impacts of committed schemes will also need to be assessed.	✓ Please see the daylight and sunlight report prepared by DKP for the detailed analysis of the proposed development.

<table>
<tr><td></td><td></td><td>Daylight, Sunlight and Overshadowing (DSO) assessment, utilising best practice tools, should be scoped and agreed with the Planning Authority prior to application and should take into account the amenities of the proposed development, its relevant context, planning commitments, and in major development areas the likely impact on adjacent sites</td><td></td></tr>
<tr><td>Chapter 11

Placemaking and Managing Development</td><td>Table 11.2

Density and Building Height Strategy</td><td>
<table>
<tr><th rowspan="3">Density and Building Heights Strategy</th><th colspan="5">Density</th><th colspan="4">Heights</th></tr>
<tr><th colspan="2">FAR</th><th colspan="3">Dwellings Per Hectare</th><th colspan="4">No. of Storeys</th></tr>
<tr><th>Prevailing</th><th>Target</th><th>Prevailing</th><th colspan="2">Target*</th><th colspan="2">Prevailing</th><th colspan="2">Target</th></tr>
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<tr><td>4. Douglas</td><td>0.2 - 2.5</td><td>0.5 - 3.5</td><td>5 - 20</td><td>50</td><td>100</td><td>2</td><td>3</td><td>3</td><td>4</td></tr>
</table>
</td><td>✓ The proposed buildings range from 1 to 5 storeys. The proposed height of up to five storeys is supported by the location of the site, within close walking distance of all the amenities and employment opportunities available in Douglas Village and on significant existing and proposed public transport routes. The setbacks from existing buildings and the retention of a significant number of trees as well as the existing boundary treatment to the west mean that the development can be integrated successfully into its context. The provision of a new public open space and pedestrian route through the</td></tr>
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			site will enhance the public realm of the village. ✓ The proposed heights respond to the existing context as follows: ✓ Along Carrigaline Road, the proposed block is generally 2 storey with setback, with a small portion to the north rising to 3 storeys to mark ✓ The proposed height reinforces the emerging 2 to 3 storeys datum along the road. ✓ To the west of the site, Block 2 is 4+1 storeys high, responding to the generous open expanse of the graveyard. The retained existing trees on site, as well as the trees within the graveyard, will ensure that the scheme is barely visible from this location. The central Block 1A is also generally 4+1 storey, with a setback along the majority of the elevation to Carrigaline Road, ensuring a gradual rise in proposed

			heights as seen from the east or the west. ✓ The proposed density for this development is 153.7 units per hectare which is considered appropriate for this site which is identified as a City Suburb. This density is consistent with the provisions of Sustainable Residential Development and Compact Settlements 2024.
Chapter 11 **Placemaking and Managing Development**	Table 11.11 Residential Public Open Space Provision	Greenfield Site / Areas for which a local area plan is appropriate = 15% General Provision = 10%	✓ The proposed development includes a total of 1259.2 sqm public open space. ✓ This proportion of public open space exceeds the Development Plan's minimum standards (1,237.5m2 required).
Chapter 11 **Placemaking and Managing Development**	Table 11.13 Maximum Car Parking Standards	Zone 3: Blarney, Douglas, Tower, Rochestown ▪ Residential: 2 no. for every one and two bed unit ▪ Residential: 2 + 0.25 visitor for every 3+ bed unit ▪ Creche: 1 per 6 students ▪ Community Building: 1 for every 75sqm ▪ Retail: 1 for every 30sqm	✓ Based on these standards the proposed development would require a total of max 135 no. car parking spaces (113 no. for the one and two bed units, 22 no. for the three bed units).

			✓ The proposed development includes a total of 26 no. car parking spaces. ✓ The proposed car parking spaces are within the maximum limits set out in the development plan and also provide a sustainable proportion of car parking.
Chapter 11 **Placemaking and Managing Development**	Section 11.185 Cafes/Restaurants	The positive contribution of cafés and restaurants and the clusters of such uses to the vitality of the City is recognised. The following shall be considered in assessing applications for cafés/ restaurants: 1. The need to retain, protect and strengthen the vitality and multi-use function of designated centres; 2. The number/frequency of cafés / restaurants in the area; 3. The effect of noise, fumes, hours of operation, and general disturbance on nearby amenities and residents. Full details of any external extractor fans/vents and hours of operation of the development shall form part of a planning application; 4. Traffic implications including adequate and safe delivery areas; 5. Waste storage facilities; 6. Any proposed signage/advertising/lighting shall be suitable and unobtrusive.	✓ The development proposes a new café at ground floor to the eastern block which will comprise of large windows and outdoor seating along Old Carrigaline Road which will contribute to an active and well overlooked public and communal realm. This use will provide animation and football at the site's main pedestrian entrance.
Chapter 11 **Placemaking and Managing Development**	Section 11.242	1. Multi-unit residential developments shall provide a minimum of one EV equipped parking space per five car parking. All other parking spaces shall be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs.	✓ The proposal includes (as per TGD L 2022) Ducting Infrastructure which will be provided for every parking space in this development to enable the subsequent installation of recharging

		2. New dwellings with on-site car parking should be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs. 3. Other / non-residential development with more than 10 spaces shall provide at least 1 parking space equipped with a functioning EV charging point and at least 20% of spaces shall incorporate appropriate infrastructure (ducting) to allow for future fit out of a charging point.	points for electric vehicles. This will promote sustainable transport.
Chapter 11 **Placemaking and Managing Development**	Table 11.14 Bicycle Parking Requirements	Apartment: 0.5 per unit in suburbs Retail: 1 per 100sqm GFA Creche: 1 per 35 children	✓ Based on these standards the proposal would require 62 no. bicycle parking spaces for the apartments and 4 no. bicycle spaces for the retail/commercial aspect. ✓ The proposed development includes a total of 274 no. bicycle parking spaces with 212 no. provided for the apartments and 62 no. provided for visitors and another 14 no. for other users. ✓ This exceeds the minimum bicycle parking standards set out in Table 11.14.
Chapter 11	Section 11.272 Scheme Sustainability Statements	All planning applications involving developments of 25 or more homes or over 500sqm of commercial floorspace to be accompanied by a Scheme Sustainability Statement demonstrating how the proposal positively responds to the impact	✓ Please see the sustainability energy statement provided by MBA Engineers.

Placemaking and Managing Development		of climate change through mitigation and adaption measures. The Scheme Sustainability Statement is required, as a minimum to demonstrate how the following climate change mitigation and adaptation considerations inform the proposal: 1. How the location, siting, layout, design and drainage proposals maximise climate adaptation opportunities; 2. How the SUDS strategy integrates the four pillars of SUDS Design – water quantity, water quality, amenity and biodiversity; 3. The use of green roofs other green infrastructure as a means of contributing towards sustainable urban drainage, improving biodiversity and influencing heat loss/gain from the building; 4. Energy efficiency through thermal insulation, passive ventilation and cooling, passive solar design and any technologies used to help occupants better manage energy usage; 5. The use of district, renewable and/or low-carbon energy supply opportunities; 6. How the proposals at all stages embrace the Circular Economy approach in relation to waste management from construction through to the operation of the building(s); 7. How noise and air pollution will be managed across all stages of development from construction through to operation of the building(s).	
Chapter 12 **Land Use Zoning Objectives**	Section 12.21 Land Uses and Flooding	Flood Risk Zones A and B have been identified by the Strategic Flood Risk Assessment. These zones may impact new development, but facilitate existing development uses that may require small scale development such as small extensions. Development proposals within these zones shall be accompanied	✓ The site is not within a potential flood zone and does not have any history of flooding, the site is within the defenced area of

		by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.	the Douglas Flood Relief Scheme and a Flood Risk Assessment has been prepared by Arup as part of this application.
Chapter 12 **Land Use Zoning Objectives**	ZO 4 Mixed Use	Zoning Objective: *To provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area* Site is also identified as Neighbourhood development Site 2: Paragraph 10.321 The identification of Land at Barry's Field as a local transformation site represents an opportunity to incorporate, a comprehensive high-quality mixed-use development that positively responds to Carrigaline Road, Church Street and Church Yard Lane. This has the potential to incorporate a mix of employment generating uses, homes and community infrastructure into an underutilised infill site and introduce public realm improvements and pedestrian permeability that will improve the overall urban experience in this part of Douglas. During the lifetime of the Plan, the telephone exchange facility directly to the south could come forward as part of a comprehensive scheme with the Barry's Field Site or independently but having regard to the need to integrate and contribute towards the design ethos and mix of uses proposed at Barry's Field.	✓ The proposed development will provide a mix of uses including residential, a café and an office spaces which are in line with this land use zoning. ✓ The development proposes a high-quality mixed-use development for part of the landholding within the applicant's control. ✓ The scheme proposed public realm improvements along Carrigaline Road and enhanced pedestrian improvements along Churchyard Lane.