

Planning Report & Statement of Consistency

Proposed SHD Planning Application

**Blackglen Road
Sandyford
Dublin 18**

**On behalf of
Zolbury Ltd.**

August 2022



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



1	EXECUTIVE SUMMARY	5
1.1	The Subject Site.....	5
1.2	The Proposed Development.....	5
1.3	Planning History.....	6
1.4	Planning Context.....	6
2	INTRODUCTION	0
2.1	Context for the lodgement of this Planning Application.....	0
2.2	Hard and Digital Copies.....	0
3	APPLICANT AND DESIGN TEAM	1
4	THE SITE	2
4.2	Site Location.....	2
4.3	Settlement Pattern	4
4.4	Transport Infrastructure	6
5	PLANNING HISTORY	9
5.1	Subject Site.....	9
5.2	Surrounding Area	10
	15
5.2.1	<i>Planning Comment on Planning History.....</i>	<i>15</i>
5.3	Statutory Notices.....	15
6	SECTION 247 PLANNING STAGE	16
6.1	Design Iteration	16
6.2	Planning Authority Pre-Planning Meeting.....	16
6.3	Housing Department	21
7	SHD PRE-PLANNING APPLICATION CONSULTATION REQUEST	22
7.1	Planning Authority Opinion	22
7.2	Pre-Application Consultation Meeting	22
7.3	An Bord Pleanála Opinion	22
8	DESCRIPTION OF PROPOSED DEVELOPMENT	23
8.1	Overview of Proposed Development.....	23
8.2	Key Site Statistics	24
8.3	Design Rationale.....	25
8.4	Separation Distances	26
8.5	Residential Mix.....	31
8.6	Residential Density	31
8.7	Childcare Facility.....	32
6.4	Landscaping and Open Space.....	33
8.5	Trees & Hedgerows.....	35
8.6	Ecology	35
8.6.1	<i>FitzSimons's Wood.....</i>	<i>36</i>
8.7	Screening for Appropriate Assessment.....	37
8.8	Building Height	38
8.9	Landscape & Visual Impact.....	39
8.10	Residential Amenity Building.....	41
8.11	Dual Aspect.....	41
8.12	Car Parking	41
8.12.1	<i>Car Club.....</i>	<i>41</i>
8.13	Cycle Parking	42
8.13.1	<i>Cargo Bicycles & Workshop.....</i>	<i>42</i>
8.14	Mobility Management Plan.....	42





8.15	Part V	42
8.16	Protection of Established Residential Amenity	42
8.17	Daylight and Sunlight.....	43
8.18	Wind Assessment.....	43
8.19	Services	44
8.20	Architectural Heritage Impact Assessment.....	45
9	STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT	47
9.1	Introduction	47
9.2	Project Ireland 2040 – National Planning Framework.....	47
9.3	Project Ireland 2040 – National Planning Framework.....	48
9.4	Housing For All – A New Housing Plan for Ireland 2021	51
9.5	Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031.....	152
9.6	Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009) 56	
9.6.1	<i>Urban Design Manual</i>	59
9.7	Delivering Homes Sustaining Communities (2007)	64
9.7.1	<i>Quality Homes for Sustainable Communities (2007)</i>	64
9.8	Guidelines for Planning Authorities on Childcare Facilities (2001)	65
9.9	The Planning System and Flood Risk Management (2009)	67
9.10	Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)	68
9.11	Design Standards for New Apartments (2020)	69
9.11.1	<i>Location</i>	69
9.11.2	<i>Specific Planning Policy Requirements (SPPRs)</i>	70
9.11.3	<i>Internal Storage</i>	73
9.11.4	<i>Private Amenity Space</i>	73
9.11.5	<i>Part V</i>	73
9.11.6	<i>Refuse Storage</i>	74
9.11.7	<i>Bicycle Parking and Storage</i>	74
9.11.8	<i>Cargo Bicycles & Workshop</i>	75
9.11.9	<i>Car Parking</i>	75
9.11.10	<i>Car Club</i>	76
9.11.11	<i>Quantitative Requirements of the Apartment Guidelines</i>	76
9.12	Urban Development and Building Height Guidelines (2018).....	77
9.12.1	<i>Policy Context</i>	77
9.12.2	<i>Specific Planning Policy Requirements</i>	78
9.13	Design Manual for Urban Roads and Streets (DMURS) (2013)	85
9.14	Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, dated August 2018, issued pursuant to s.28 of the 2000 Act	86
9.15	Climate Change and Low Carbon Development Act 2015.....	87
10	LOCAL PLANNING CONTEXT.....	89
10.1	Dun Laoghaire – Rathdown Development Plan 2022-2028.....	89
10.2	The Core Strategy	89
10.3	Housing	89
10.4	Planning Policy.....	91
10.5	Transitional Zoning.....	96
10.6	Ecological Network	98
10.7	Separation Distances	99
10.8	Housing Mix.....	99
10.9	Minimum Apartment Floor Areas.....	99
10.10	Internal Storage Space.....	100
10.11	Residential Density	100





10.12 Open Space.....	101
10.13 Trees.....	105
10.14 Building Height	105
10.15 Car Parking	114
10.16 Cycle Parking	116
11 CONCLUSION.....	117
12 APPENDIX 1.....	118





1 EXECUTIVE SUMMARY

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

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

1.1 The Subject Site

- The context immediately surrounding the Blackglen Road site is evolving, with the construction of the Blackglen Road Improvement Scheme and recent applications for residential development. The established character of predominately detached single houses on large sites is transitioning towards increased density and more efficient use of land. The lands directly bounding the site are zoned residential with rural areas located across Woodside Road, some commercial to the north and Lambs Cross Village to the east. The subject site is located at a point between Lambs Cross, Fitzsimons Woods, Ticknock and Belamine, which creates a need for a considered design which will be sympathetic to these distinct rural and urban contexts.
- The development will be accessed off the soon to be completed upgraded Blackglen Road, with a main internal spine route providing legibility, and running through the entire site to the Woodside Road boundary. Pedestrian and cyclist access only are provided at Woodside Road. There is no vehicular through route within the site.
- There is a ruin of two semi-detached cottages, immediately adjacent to the eastern boundary of the proposed development outside of the redline boundary. These are believed to have been occupied by Constance Markiewicz in the lead up to the Easter Rising of 1916. The layout of the proposed development will not involve construction anywhere in the immediate vicinity of the ruins.
- The design approach to this site has sought to respond and sensitively integrate the proposed development into and around the natural rolling hillside landscape. The aim is to create a distinctive environment and sense of place combined with high quality architecture which responds directly to the unique characteristics of the site.

1.2 The Proposed Development

- A total of 360 no. residential apartment units are proposed together with residential amenity facilities and a creche facility. The proposed development is designed by an award winning architectural practice to provide homes for a range of household types and will support the viability of local services in Sandyford Village and Lambs Cross.
- Block A2 contains a resident amenity space of 607sq.m. This building is conveniently located at the Blackglen Road entrance and is designed to provide a range of services to future residents.
- A childcare facility of c. 401 sq m is proposed in Block A1. The creche has been designed to have capacity for the childcare needs of the proposed development and is located at the entrance of the development, to facilitate ease of access. The creche is afforded appropriate outdoor play space and car parking to serve staff and drop off.
- A total of 419 no. car parking spaces will be provided across the proposed residential development.
- The proposed development achieves a net density of approximately 97.3units per hectare. The subject site is strategically located in close proximity to the established area of Sandyford





village, with good public transport services connecting it to Sandyford, Blackrock, Dun Laoghaire, Dundrum and Dublin City Centre.

- At the outset, the design approach to this site has sought to respond and sensitively integrate the proposed development into and around the natural rolling hillside landscape. The aim is to create a unique environment and sense of place combined with high quality architecture which responds sympathetically to the unique characteristics of the site and its surroundings.
- The development has a general shoulder height of 6 storeys, with stepped variations responding to the specific site context. This considered design approach results in heights of 1 to 3 storeys at sensitive edge locations rising to 6 storeys in the heart of the scheme.
- Transport infrastructure in the area is currently being upgraded by way of the Blackglen Road Improvement Scheme, due for completion in Spring 2023. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site once the new infrastructure is in place.
- The Glencairn LUAS is a 9-minute cycle from the site and 2 no. Dublin Bus stops are within 120m of the site. Presently there are no cycle lanes or footpaths along the majority of Blackglen Road. However, the Blackglen Road Improvement Scheme (currently under construction) will greatly improve the pedestrian, bus, and cycle facilities at this location.
- The proposed new public open green space has been intentionally integrated into the surrounding areas green infrastructure with new pedestrian access proposed along Blackglen Road and Woodside Road, creating a possibility for a future connection between FitzSimons Wood and Ticknock mountains.

1.3 Planning History

- In 2007, an appeal was withdrawn by the applicant with An Bord Pleanála for the development of 224 residential units, at the proposed development site.
- In 2008, permission was refused for the development site comprising of 36 no houses, 2 no. two storey dormer terraced houses and 142 no apartments. The main reason for refusal was *“...the lack of continuous footpath along the Blackglen Road.....it is considered that the proposed development would be premature, would endanger public safety by reason of traffic hazard...”*
- In 2020 the application site was subject to a previous SHD Consultation with the Planning Authority and An Bord Pleanála for 153 no. apartment units, which did not reach formal lodgment stage

1.4 Planning Context

- The publication of the Urban Development and Building Heights Guidelines for Planning Authorities, and Regional Spatial and Economic Strategy for the Eastern and Midland Region has significantly changed the planning landscape of the site. This change in context is a key consideration for the density of the proposed development.
- The subject site is zoned ‘A’ - “To Protect and/or improve residential amenity” and has been the case for the last 40 years. Uses permitted in principle under this zoning include ‘Residential’ and ‘Childcare Facility’. Accordingly, the proposed residential uses, crèche facility and residential amenity are permitted in principle.
- The scheme design seeks to integrate the proposed development with the existing landscape as much as possible ensuring that the natural characteristics of the site are retained and provide the opportunity to promote sustainability around a sylvan setting for the proposed new development.





- The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with national planning policy
- The proposed development is in accordance with applicable national, regional, and local planning policy. In particular, the proposed heights and density for this scheme is supported by national planning policy.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.
- The subject site is clearly defined as being infill, brownfield and within the established urban footprint of the Metropolitan Area. The site is consistent with the definition of underutilised land zoned for development and proximate to established social infrastructure. The proposed development represents a dynamic and appropriately considered design response which will provide a landmark at Blackglen Road, and establish precedent for further sustainable, high quality density development on 'A' zoned lands in the general area.
- It is our professional planning opinion that the proposed development site has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the surrounding area.

Full details on the planning context in relation to the proposed development is set out below which details the scheme's compliance with relevant planning policy and ministerial guideline





2 INTRODUCTION

Our Client, **Zolbury Ltd. Unit 9, Ardavan Business Park, Ardavan, Wexford, Ireland Y35 XT53**, has instructed Brock McClure Consultants to lodge this Strategic Housing Development (SHD) planning application Request to An Bord Pleanála. The applicant is seeking permission for a Strategic Housing Development for 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings (A1 – C3) on lands at Blackglen Road, Sandyford, Dublin 18.

2.1 Context for the lodgement of this Planning Application

This SHD application is lodged in accordance with Part 2, section 4 (1), of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

“(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and (v) be accompanied by the appropriate fee, and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.”

This SHD application is lodged in compliance with the above requirements and particularly those set out in section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016. Furthermore, as evidenced from the application and documentation provided, this SHD application complies with the requirements of, *inter alia*, the Planning & Development (Housing) and Residential Tenancies Act 2016 (as amended); the Planning and Development Act 2000 (as amended) (*insofar as the provisions of same are relevant*); and, as appropriate/relevant, Part 23, entitled “Strategic Housing Development”, of the Planning and Development Regulations 2001, as amended (“the 2001 Regulations”).

2.2 Hard and Digital Copies

In addition, it is confirmed that, pursuant to the requirements of Article 297(5) and (6) of the 2001 Regulations, the following have been submitted to the Board:

- 2 hard copies and 3 digital copies of all material for review
- 6 hard copies and 1 digital copy of all materials have been issued to the Planning Authority of Dun Laoghaire Rathdown County Council.
- 1 digital copy has been sent to the Prescribed Bodies listed in the Board’s Opinion





3

APPLICANT AND DESIGN TEAM

The applicant is Zolbury Limited. Zolbury Limited has appointed an experienced design team to prepare this SHD application, lodged under the Strategic Housing Development process to the Board. The immediate design team comprises:

- O'Mahony Pike Architects (*Design Architects*)
- KSN Project Management (*Project Managers*)
- Brock McClure Consultants (*Town Planning Consultants*)
- O'Connor Sutton Cronin Consulting Engineers (*Design Engineers*)
- Gannon & Associates Landscape Architects (*Landscape Architects*)
- Enviroguide (*Arborist & Ecologists*)
- IAC Archaeology / Archaeology Heritage (*Archaeology*)
- Rob Goodbody (*Architectural Heritage*)
- O'Connor Sutton Cronin Consulting Engineers (*Electrical Engineers*)
- O'Connor Sutton Cronin Consulting Engineers (*Traffic & Transport Consultants*)
- O'Connor Sutton Cronin Consulting Engineers (*Daylight and Sunlight*)
- Modelworks (*Verified Views and LVIA*)
- Enfonc Ltd (*Noise Impact*)
- ISM Ireland (*Telecommunications*)
- O'Hurlihy Access Consultancy (OHAC) (*Universal Access*)
- Transport Insights (*Traffic & Transport*)





4 THE SITE

4.1 Subject Site

The subject development site is located on the south side of the Blackglen Road (R113), Sandyford Road, Dublin 18, and extends to approximately 3.7ha. The site has two road frontages, the first located to the north along Blackglen Road and the second to the southwest along Woodside Road. To the east of the Blackglen Road frontage is a 'run' of 5 semi-detached and detached cottages of one and 2-storey height which appear to generally date from recent decades.



Figure 1 - Aerial view of site outlined in Red

The topography of the site undulates significantly, with a level difference of some 22m between its highest and lowest points (138mAOD and 160mAOD). Its highest areas are to the southwest, near the Woodside Road frontage and its lowest being near the north easternmost point of the site at Blackglen Road. There are relatively level areas near these two points, with the steeper gradients towards the centre of the site.

4.2 Site Location

Blackglen Road is situated in Sandyford and falls within the jurisdiction of the Dun Laoghaire-Rathdown County Council (DLRCC). The local area is characterised by an eclectic mix of detached buildings, varying in age, style, type and massing, with some terraced houses to the East along Blackglen Road towards Lamb's Cross. The lands directly bounding the site are zoned residential with rural areas located across Woodside Road, some commercial to the north and Lamb's Cross Village to the east. The site is located at the junction between Lamb's Cross, Fitzsimons Woods, Ticknock and Belarmine, which creates a need for a design which mediates between these distinct rural and urban conditions.





In addition, the subject site is located proximate to Sandyford Village, the M50 and Lamb's Cross. The Village includes services such as shops, a pharmacy, a pub and restaurant, a take away, a church and a café. Lamb's Cross is proximal to the site and includes services such as a local retail convenience outlet, a butcher's, a veterinary clinic and a hair salon. The M50 is accessible from the subject site, approximately 1.4 km to the north-east of the site at Junction No. 14.



Figure 2 - Subject Site - Wider Site Context

With public transport stops within short walking distance, this proposed development site is appropriate for residential development of a higher density. The Glencairn LUAS is a 9 minute cycle from the site and 2 no. Dublin Bus stops are within 120m of the site. The available bus services include Dublin Bus Route 44B which operates between Dundrum Luas Stop and Ballybrack Road, Glencullen. In addition, Go-Ahead Bus operates bus route 114 in the vicinity of the subject site providing services between Rockview, Ballinteer and Blackrock Station via Sandyford and UCD Belfield.

- Glencairn LUAS – 1.9km / 9-minute cycle
- Sandyford Business District - 2.1km / 27 min walk
- Lamb's Cross Neighbourhood Centre – 400m east
- 44 Bus Route to City Centre & DCU – 1.2km / 14 min walk
- 47 Bus route to City Centre via UCD – 1.2km / 14 min walk.
- 44B Bus Route to Dundrum Luas Stop – 120m
- 114 Bus Route to Blackrock Dart Station - 120m



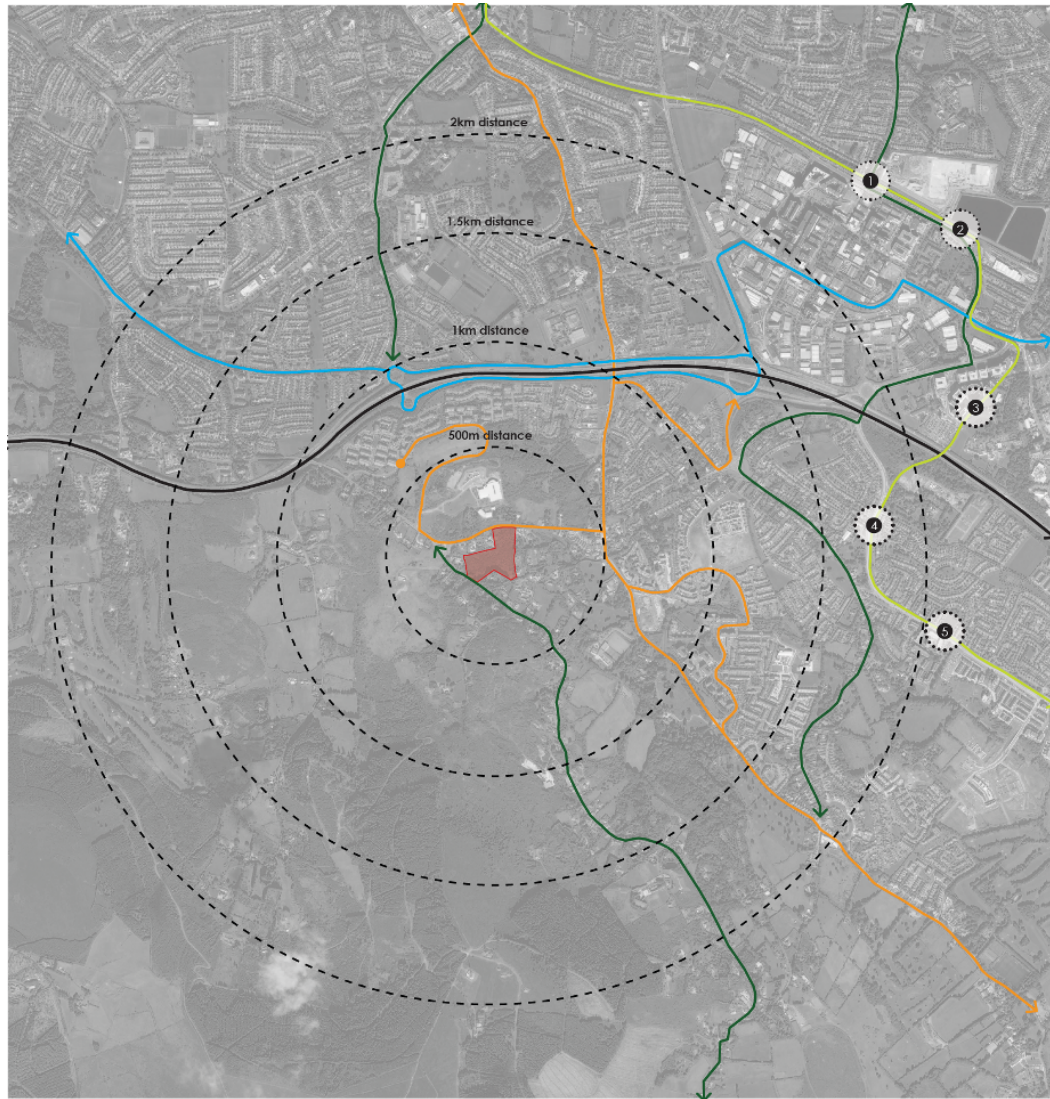


Figure 3 - Map of site location with Public Transport

4.3 Settlement Pattern

The context immediately surrounding the Blackglen Road site is predominately detached houses, with some semi-detached and terraced houses to the east along Blackglen Road towards Lamb's Cross, The lands directly bounding the site are zoned residential with rural areas located across Woodside Road, some commercial to the north and Lambs Cross Village to the east.



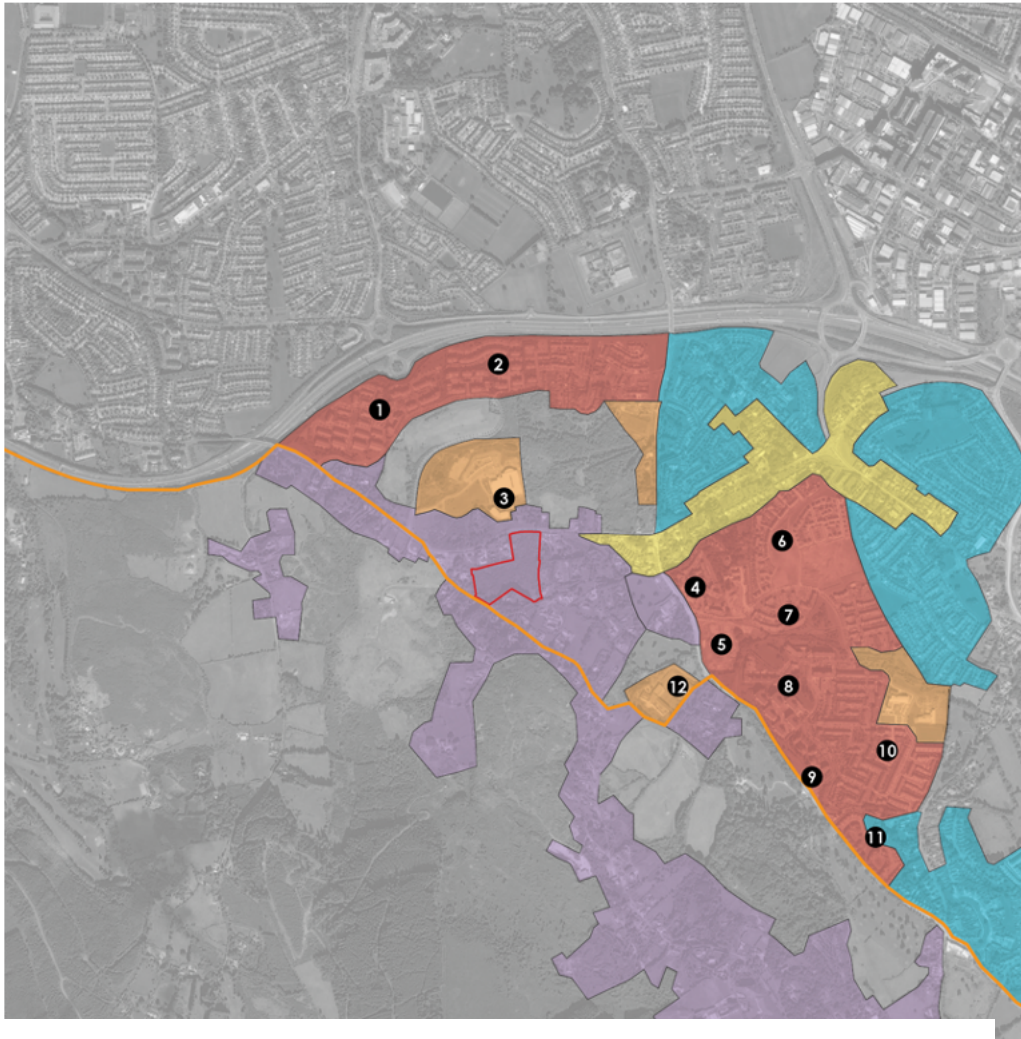


Figure 4 - Subject site and. surrounding settlement pattern

Settlement Pattern Key

	Urban 4-6 Storey		Village 1-2 Storey
	Cul-de-sac 2-3 Storey		Rural 1-2 Storeys
	Commercial 1-3 Storeys		

- ① Blackthorn Hall Apartments
- ② Sandyford Apartments
- ③ Explorium National Sport & Science Centre
- ④ The Hill & Wood Apartments, Aikin's Village
- ⑤ The Glen Apartments, Aikin's Village
- ⑥ Belmont Stepside
- ⑦ Cluain Shee
- ⑧ The Belfry Apartments
- ⑨ Parkview Apartments
- ⑩ Belamine Estate
- ⑪ Littlewood Apartments
- ⑫ Rosemont School





4.4 Transport Infrastructure

The most significant issue in previous efforts to develop the lands relates to the deficiency of the local road network, which restricts the delivery of residential units. This impediment to development is, however, now on a clear timeline to resolution with the implementation of the Blackglen Road Improvement Scheme. Works are at an advanced stage and are due to be complete by Spring 2023. .. Once complete they will facilitate a Quality Bus Corridor which will integrate the proposed development with a network of radial and orbital bus priority routes with established high quality and frequency bus and rail routes with connections across Dublin City.

We confirm that the applicant would welcome a condition to any grant of permission which requires that housing on site can only be occupied once this phase of the Blackglen Road Improvement Scheme has been completed.

The development will be accessed off the upgraded Blackglen Road, with a main spine route providing legibility, and running through the entirety site to the Woodside Road boundary. Pedestrian and cyclist access are provided at Woodside Road, so there is no vehicular through route within the site. Short spur routes off the spine road provide access to car parking areas.



Figure 5 -Blackglen Road Improvement Scheme

At present, two Dublin Bus routes are located within 120 meters of the site entrance. The northern boundary of the site is located approximately 110m (2 minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 east and stop 3494 west, which is served by Dublin Bus Service No. 44B and Go ahead service 114.

The Dublin Bus operated service 44B operates on weekdays only whilst the Go- Ahead operated service 114 operates on a daily basis seven days a week and offers frequent services as summarised in Table 2.1 below.





Operator	Route No.	Route	Mon -Fri	Sat	Sun
Dublin Bus	44B	Dundrum Luas – Glencullen	5	-	-
		Glencullen – Dundrum Luas	5	-	-
Go Ahead Bus	114	Rockview – Blackrock Station	17	15	10
		Blackrock Station - Rockview	17	15	10

Table 1 - Bus Service Quantity [Source: TFI]

The closest LUAS Green Line interchange (Glencairn) is located approximately 1.9km (22-minute walk) walking distance to the east of the subject site via the Hillcrest Road and Kilgobbin Road. The LUAS Greenline currently provides access to Sandyford, Dundrum and the City Centre to the north and intermediate destinations along its route (Figure 2.6). Table 2.2 below summarises the frequency with which the Luas Green Line service operates. Dublin Bus Route 44B as introduced previously also provides direct access to Luas Greenline services at Dundrum whilst Go Ahead service 114 provide direct bus access to Luas Greenline services at Sandyford.



Figure 6 - Luas Greenline Destinations [Source:Luas]





Time	Monday – Friday	Saturday	Sunday
Peak	9	14	12
Off Peak	13	16	14

Table 2 - Luas Service Frequency (minutes)





5 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the subject site and adjoining sites is set out below.

5.1 Subject Site

D01A/0763 & ABP PL06D.131236

In June 2003 permission was refused for 44 no. dormer bungalows in two separately accessed areas. Area 1 (east) 24 no. units with access to Blackglen Road. Area 2 (west) 20 no. units with access to Woodside Road with on and off site development works. DLRCC refused permission on the basis that the development was premature pending the road improvement works on Blackglen Road. The decision was subsequently appealed to An Bord Pleanála. An Bord Pleanála upheld the decision of the Planning Authority and refused permission.

D07A/0425 & ABP PL06D.223989

In May 2007 permission was refused for a development consisting of 224 residential units (130 no. apartments, 58 no. duplexes and 36 no. houses), an underground car park for 149 cars, and surface parking for 206 cars and a crèche, all on a development site of area 3.693 hectares (9.125 acres) at the main location. DLRCC refused permission by reason of its height, scale and massing and the mix of units proposed. In addition, they noted having regard to its location remote from major public transportation corridors and employment centres, lack of pedestrian links and road network would result in an unsuitable form of development in the area and that the development was again premature pending the determination by the Planning Authority of a road layout for the area.

The decision was appealed by the applicant to An Bord Pleanála, but this appeal was subsequently withdrawn.

D07A/1598 & ABP PL06D.227869

In January 2008, permission was refused, by the Planning Authority and An Bord Pleanála, for development comprising of 36 no. houses, 2 no two storey dormer terraced houses, and 142 no apartments, surface car parking for 282 cars, a single storey crèche. This proposed development was on a site of area 3.693 hectares (9.125 acres) at Blackglen Road and Woodside Road.

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

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





Figure 7 - Proposed Development of Planning Application D07A/1598

ABP-307157-20

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

5.2 Surrounding Area

D20A/0525

In October 2020 permission was granted for a proposed development comprising of the proposed conversion of an existing detached garage into an accessible bedroom & en-suite bathroom including minor alterations to elevations together with a single storey link to the main dwelling house.

D05A/1029 & PL06D.216070

Dorville House Limited sought permission in August 2005 for the demolition of the existing derelict house on site at Blackglen Road and subsequent construction of 75no. residential units. Dún Laoghaire – Rathdown County Council granted permission for the development on 5 January 2006. This decision was appealed to An Bord Pleanála on 30 January 2006 and was ultimately refused on 3 October 2006.

An Bord Pleanála refused permission having regard to the existing deficiency in the road network serving the area and in particular the lack of a continuous footpath along the Blackglen Road between the site and Lambs Cross.

D21A/0383 / ABP-310859-21

In July 2021, Permission was refused for the sub-division of an existing site for the construction of a detached two storey house, connection to public foul sewer and utilisation of existing vehicular entrance and all associated site works.

This decision was subsequently appealed and An Bord Pleanála have overturned the decision by the Planning Authority and granted permission for the development having regard to the zoning of the site and the existing pattern of development in the vicinity of the site and the design and layout of the existing established access which has been incorporated in to the Blackglen Road Improvement Scheme which is currently under construction.

ABP 309965-21

In August 2021 permission was refused for a development proposal at Lambs Cross, situated directly north of the subject site. The application consisted of the demolition of existing dwelling on site and permission for a mixed use development consisting of 143 Residential Units, including 4 live work units (Block A = 34, Block B = 27, Block C = 48, Block D = 34) Communal Room (36sq.m) Hot Desk Area (36sq.m) Commercial Unit (42sq.m) x2 Office units (Office 1, 48sq.m Office 2, 97sq.m) Coffee Shop 42sq.m, Gym 115sq.m, Community Room 36sq.m and a Crèche 200sq.m., together with 166 Car Parking Spaces (9 surface spaces and 157 basement spaces inclusive of 5 disabled spaces and 5 car share), raised pedestrian board walk, landscaping/tree planting and all associated works.



Figure 8 - CGI Image of the proposed development for AB 309965-20

Permission was refused by the Board for 3no. reasons:

'The Board is not satisfied that a comprehensive evaluation of the impact of the proposed development including the construction of a basement level and potential dewatering of the ponds in Gorse Hill has been provided. There are concerns that the proposed development would adversely impact on the hydrology and hydrogeology of the 4no. ponds in the Gorse Hill area with potential negative consequences for the smooth newt. It is also considered that the developer has not adequately demonstrated that the proposed development, which includes a boardwalk through Fitzsimons Wood pNHA would be in accordance with the provisions of Policy LHB19: Protection of Natural Heritage and the Environment and Policy LHB22:

Designated Sites of the Green County Strategy in the Dún Laoghaire Rathdown County Development Plan 2016-2022 to protect and preserve areas designated as proposed Natural Heritage Areas. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

It is considered that the proposed development by virtue of the scale, bulk and design of the blocks, the poor quality open space provision, undue overshadowing of the adjacent Whinsfield residential development and poor quality elevational treatments, that the proposed development would result in a substandard form of development that fails to integrate with the surrounding area and would therefore be contrary to the provision of the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual, A best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009 and to Policy UD6 Building Height Strategy, Policy RES3 Residential Density and Section 8.3.2 Transitional Zonal Areas of the Dun Laoghaire Rathdown Development Plan 2016-2022. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

It is considered that the proposed development materially contravenes Policy UD6: Building Height Strategy of the Dun Laoghaire Rathdown Development Plan 2016-2022. The statutory requirements relating to public notices and the submission of a material contravention statement have not been complied with by the developer. Accordingly, the Board is precluded from granting permission in circumstance where the application is in material contravention of the Development Plan and where the statutory requirements referred to above have not been complied with'.

ABP 313321-22

In April 2022, an application was lodged with An Bord Pleanála for a SHD development adjacent to the subject site. The development to which this SHD Planning Application relates involves a proposal for 101no. residential units. The proposed apartments and duplexes are arranged in two blocks connected by a podium; both 3-4 storeys in height. Block A (fronting Blackglen Road) accommodates apartments and Block B (to the rear) features a mixture of apartments and duplex units with a crèche incorporated into the block. The remaining residential units are to be own-door, terraced houses. All car parking space are at surface level or beneath the podium. The development also proposes to carry out demolition works on two existing, derelict structures centrally on site. All developments will occur on a site of c. 1.938Ha at Blackglen Road.

This is due to be decided by 2nd August 2022.



ABP 313443-22

In April 2022, an application was lodged with An Bord Pleanála to the north east of the subject site for the permission for a SHD Development. The proposed development principally consists of the demolition of the existing dwelling and ancillary buildings known as ‘Glenina’, the existing dwelling known as ‘Karuna’ and the existing boundary wall fronting Sandyford Road, and the construction of a residential development principally comprising 137 No. apartments (32 No. 1-bed units, 78 No. 2-bed units and 27 No. 3-bed units) in 4 No. blocks ranging in height from part-1 No. storey to part-6 No. storeys with a part-basement/part-undercroft level (at Blocks B, C and D).

This is due to be decided by 17th August 2022.

**D22A/0365**

In July 2022 permission was refused by DLRCC for a residential development, consisting of 46 no. units comprising 36no. apartment units in a 4-storey block. The proposal included the demolition of an existing derelict dwelling on the site, the provision of upgraded vehicular and pedestrian access to the site from the Blackglen Road and new internal access road and footpaths.

Permission was refused for 3 no reasons as follows:

- The proposed development, by reason of its layout, fails to achieve a quality sense of place, fails to have due regard to its surrounding context, and fails to provide appropriate linkages and relationships with adjoining lands to the northwest and northeast. As such, it represents piecemeal development, and would have a detrimental and negative impact on the surrounding character of the area, would be seriously injurious to the existing and future residential amenities in the area. Furthermore, by virtue of the design of Block A, it would appear visually obtrusive and overbearing from Blackglen Road. The proposed development is therefore considered contrary to Policy PHP35: Healthy Placemaking, Policy Objective PHP37 - Public Realm Design and Policy Objective PHP42 - Building Design & Heights as well as Appendix 5 (Building Height Strategy) of the Dun Laoghaire Rathdown County Development Plan, 2022-2028 and the Urban Development and Building Heights, Guidelines for Planning Authorities (2018, DoHPLG). The proposed development is also considered contrary to Policy Objective T11: Walking and Cycling, Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking and Section 12.3.1.1 Design Criteria of the Dún Laoghaire-Rathdown County Development Plan, 2022-2028 which seeks to achieve high standards of design and layout to create and foster high quality, livable neighbourhoods.

- The proposed development is located in part on land zoned Objective 'A', with a stated objective, 'To provide residential development and improve residential amenity while protecting the existing residential amenities', and to the north of the site on land zoned Objective 'F', with a stated objective to, 'To preserve and provide for open space with ancillary active recreational amenities'. Residential use is permitted in principle on land zoned 'A' but it is not permitted in principle or open for consideration on land zoned 'F'. Given one of the apartment blocks (the 'Terrace Block') lies in part on land zoned Objective 'F', it is considered that the proposed development is not acceptable in principle and as a result materially contravenes the 'F' zoning development objective of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 and would be contrary to the proper planning and sustainable development of the area.
- The proposed development fails to take due regard to the environmental and ecological sensitivities of the site and surroundings in its design. It has not been sufficiently demonstrated the scheme would not be unduly injurious to flora and fauna on site and in the vicinity.





Figure 9 - Map showing planning application in the surrounding area

5.2.1 Planning Comment on Planning History

It is submitted that consideration of the subject site for residential development is no longer premature given that there is a clear timeline of Spring 2023 for the completion of the much needed road improvement works. We trust the Board will consider the proposed development on the basis of the infrastructure being tangibly delivered prior to the occupation of units within the scheme.

The proposed development provides residential development at an appropriate density for this site. At the same time, it is sensitively designed to avoid negative impacts on neighbouring properties and surrounding areas.

5.3 Statutory Notices

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





6 SECTION 247 PLANNING STAGE

The evolution of the scheme and details on the level of engagement with the Planning Authority are summarized in brief below.

6.1 Design Iteration

It should be noted that the proposed strategic housing development and particularly the design layout now submitted is historically the product of a positive engagement process with the planning authority.

The proposed development, which forms the subject-matter of this application for development, has been progressed on the basis of careful consideration of the assessment contained in the Board's Opinion.

6.2 Planning Authority Pre-Planning Meeting

An initial pre-planning submission was lodged to the Planning Authority in May 2021. A formal pre-planning meeting was held on 20th of May 2021 to discuss the proposal in principle. The matters raised by the Planning Authority and a subsequent response from the applicant is detailed below.

Item	Planning Authority Discussion Point	Applicant Response
Drainage		
1.	DLR Drainage notes the presence of a Stream near the south boundary. Site Specific Flood Risk Assessment is required.	A Site Specific Flood Risk Assessment has been prepared by O'Connor Sutton Cronin, and is accompanied with this application.
2	DLR Drainage also seeks clarity on proposal on foul drain and notes that further technical details are required. Consideration should also be given to providing a foul drain wayleave.	O'Connor Sutton Cronin have provided detail on the proposal of foul drain and technical details required for the foul drain wayleave.
3.	DLR Drainage flags the requirements of the Green Roofs Policy.	It is proposed to provide green roofs on the buildings within the development. Details of the Green Roof Policy is provided in the Engineering Services Report, Section 3.4.2.3 issued by OCSC.
Transport		
4.	DLR Transport recommends engagement with Part 8 project team around delivery of road works on Blackglen Road.	DLR County Council is currently busy with road upgrades along Blackglen Road. The improvement entails the upgrade of 2.02km of road, and includes the following transport infrastructure related items: Construction of pavement, footpaths and cycle lanes which are currently not present along Blackglen Road. Upgrading of existing signalised junctions at Lambs Cross and Grange Road/Harold's Grange Road/Kellystown Road / College Road and new toucan crossing on Blackglen Road; Upgrading of bus stops on Blackglen Road, Sandyford Road and Enniskerry Road.





5.	Details around phasing should be provided.	<p>Details of the Phasing and Monitoring of the proposed development are included in the Mobility Management Plan prepared by OCSC. It is proposed that an initial evaluation of the preparation of the operation of the plan will take place 6 months into its operation. The plan will be appropriately adjusted at that stage based on the results.</p> <p>Given the limited size and scale of the proposed development it is expected that it will be developed in a single phase.</p>
6.	DLR Transport seeks clarity on whether bollards are proposed on access from Woodside Road.	An additional pedestrian access will be available via Woodside Road, although this access is only for pedestrian and emergency-purposes and will not allow vehicular access under normal conditions
7.	A detailed assessment of traffic impacts on Lambs Cross and Hillcrest Road should be provided.	A detailed assessment of traffic impacts has been prepared by O'Connor Sutton Cronin Traffic and Transport Assessment, and is accompanied with this application
8.	The Applicant is advised to consider parking provision of schemes in the area to determine if 1:1 ratio is appropriate.	The car parking ratio provided for the proposed development is 1:1.16.
9.	Criteria for considering a unit as 'dual aspect' should be clarified. The applicant is requested to avoid the provision of single aspect north-facing units.	<p>Following the guidance from the apartment guidelines there are a number of units which marginally fall within the single aspect north facing category.</p> <p>This is due to the overall master planning design principles, in order to achieve continuity of building form and provide enclosure and sense of containment of external spaces within the overall urban design strategy.</p> <p>Where it has not been possible to avoid the single aspect North facing units, OMP have provided design enhancements to some of these units where possible in order to improve the overall quality of these units as follows:</p> <ul style="list-style-type: none"> • Providing an unobstructed view over the Central Public open space • Providing an unobstructed view over Dublin Bay within the A Blocks and some units in the B Blocks • Providing increased sized units (+10%) • Elongating the facade of such units to allow for additional glazing and better daylight. • Placing Amenity spaces in front of the North facing units within B & C Blocks
10.	The applicant should submit a 'Social Infrastructure Capacity Assessment (including School Capacity assessment) with any future submission or application.	A "Social Infrastructure Capacity Assessment (including School Capacity assessment)" has been prepared by Brock McClure, which is included with the application.





Parks		
11.	An assessment of impacts on biodiversity should be provided. Impacts on Fitzsimons Wood pNHA should also be considered.	An Assessment on Biodiversity will be included in the EclA report that is provided by Enviroguide. As stated in the EclA Fitzsimon's Woods pNHA is located c.110m to the north of the subject site. The proposal maintains no significant impact pathway with this pNHA, hydrological or otherwise. Enviroguide have included it in the precautionary zone of Influence (ZOI).
12.	DLR Parks considers the landscape strategy positive pending further details on drainage and biodiversity being provided.	Gannon + Associates have provided a detailed Landscaping Strategy Report which details on drainage and biodiversity being provided within the proposed development.
13.	Some areas considered for public open space are deemed to be boundary strips, however, it is considered that the nature trail could bring certain areas to active use.	The main public open space is located in the centre of the development and acts as the intersection between the various desire lines of crossing native tree trails and pathways making it easily accessible for all residents and visitors. This space is characterised by an open Parkland type landscape with natural play elements and is sheltered to the North by a proposed woodland tree area and trail.
14.	Planting proposal a key input to determine the quality of open spaces. Location of open spaces at podium level affects the quality of those spaces.	A planting proposal for the proposed development has been provided by Gannon + Associates in the Landscaping Report.
Planning		
15.	Proposed density is deemed above the provisions of the Guidelines on Sustainable Development in Urban Areas, 2009 and the Circular issued by the Department on April 2021 (NRUP 02/2021).	The proposed development achieves a new density of approximately 97.3 units per hectare. The subject site is strategically located in close proximity to the established area of Sandyford village, with good public transport services connecting it to Sandyford, Blackrock, Dun Laoghaire, Dundrum, and Dublin City Centre. The Glencairn Luas stop is approximately 1.9km away and 2 no. bus stops are present on the northern site boundary operating on Blackglen Road.
16.	The site is not in close proximity to high quality public transport.	At present, two Dublin Bus routes are located within 120 meters of the site entrance. The northern boundary of the site is located approximately 110m (2 minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 east and stop 3494 west, which is served by Dublin Bus Service No. 44B and Go ahead service 114. These services operate during peak hours, every 30 mins, and provide connections to nearby urban centres. Neither bus route currently provides connections to the city centre. It is noted that BusConnects plan for the area include the introduction of bus services 86, 87, 88 and L33, which will provide connections to the City Centre. It is worth noting that the works underway on the Blackglen Road, as set out above, include new bus priority routes which will improve the connectivity and linkages between the site and the wider area.



		The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance.
17.	Lands to the south have high amenity and rural zoning objectives.	The site layout responds to the transitional character of the high amenity zoning objectives of the lands to the south by reducing building height and density on the southern portion of the site.
18.	Proposed height is excessive and out of context.	The development has a general shoulder height of 6 storeys, with stepped variations responding to the specific site context. This considered design approach results in heights of 1 to 3 storeys at sensitive locations to a central marker building extending to 6 storeys in the heart of the scheme.
19.	The Planning Authority does not consider the subject site to be in an 'intermediate location'	The Blackglen site is within 1900m of the Luas line. Although this is slightly further than the recommended 1500m, the site is a well-connected location with bus services and a walkable distance to the Luas. The site is located on a Quality Bus Corridor with a bus stop located on the roadside boundary. The 44B bus route runs from Glencullen to Dundrum Luas Station and the 114 bus route runs from Simon's Ridge to Blackrock Station. Both Dundrum Town & Blackrock Station have numerous bus routes to neighbouring districts as well as Dublin city Centre. A DART service is also available at Blackrock Station. Glencairn is the closest Luas stop to the development and is located within 9 minutes' cycle or 27 minutes' walk. A park and ride facility is also available at Glencairn Luas Stop
20.	No significant concerns arise in terms of impacts on the amenity of adjacent properties.	<p>There will be no significant concerns in terms of impacts on the amenity of adjacent buildings. However, there will be a notable change in character for residents bounding the site and the design team has been inherently mindful of the need to protect residential amenity in the development of the scheme.</p> <p>A key principle has been to avoid long monotonous 'walls' of development and to ensure the placement of blocks allows for key views to be maintained. Blocks have been sited through extensive testing for impact in terms of shadow and access to daylight.</p> <p>The boundaries to the site feature heavy planting, which will be a mix of existing and new proposed native trees. The planting will provide a tree trail through the site for the enjoyment of residents, allow for the continuity of a wildlife corridor and providing screening to mitigate the visual change arising from the development for existing residents.</p>





21.	Proposed road works will improve existing deficient infrastructure but will not change the character of the area.	<p>The local road layout is being upgraded by way of Blackglen Road Improvement Scheme. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site.</p> <p>Presently there are no cycle lanes or footpaths along the majority of Blackglen Road. However, the Blackglen Road Improvement Scheme (currently under construction) will greatly improve the pedestrian, bus, and cycle facilities at this location.</p> <p>The proposed development will create a new urban edge and interface with Blackglen Road. This is a positive element of the development enhancing the public realm and the high quality design of the scheme will ensure the development to be an attractive addition to the area.</p>
22.	The Applicant should be looking at increasing the number of dual aspect units given the site is largely unconstrained.	<p>The proposed number of Dual Aspect Units is 50%.</p> <p>In designing the proposed development, the interest was the need to activate and ensure a degree of passive surveillance overlooking the proposed public park in the middle of the development. All corner units are dual aspect and have secondary windows on gable ends or corners ensuring that there are no blind corners. The objective is to provide a high quality, safe and useable public realm and park.</p>
23.	Housing Mix provides an insufficient number of 3-bedroom units.	<p>We note in the context of these requirements that the policy document 2020 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' contains a Specific Planning Policy Requirement in relation to dwelling mix requirements (SPPR 1), which takes precedence over any conflicting policies and objectives of the 2022-2088 County Development Plan.</p> <p>The proposed unit mix is in line with the requirements of SPPR 1 as set out in this combined planning and statement of consistency report.</p>
24.	A breakdown of public and communal open spaces should be provided.	<p>A detailed breakdown of public and communal open spaces is provided in the Landscape Rationale provided by Gannon and Associated Landscaping Architects.</p>

Table 3 - Pre Planning Meeting Notes





6.3 Housing Department

Brock McClure Planning Consultants entered into discussions with the Housing Department of Dun Laoghaire Rathdown County Council in respect of Part V proposals in May 2022. An initial indicative proposal was submitted on 31st May 2022 and a final validation letter dated 31st May 2022 is enclosed with this application.

The Part V proposal in this case is set out in detail within the OMP Part V Booklet enclosed herewith and we note the following proposal in summary:

- Total Units Proposed (360)
- Part V Proposal (36 units) - as agreed in principle with Housing.
- Proposals for Part V provide for 18.no apartments in Block A1 and 18 no. apartments in Block B1, broken down into the following unit mix:

Unit Mix	Number
1 Bed Unit	9
2 Bed Unit	24
3 Bed Unit	3

Table 4 - Unit number mix

The applicant has prepared indicative costings for consideration by the Housing Department on this proposal, which are enclosed herewith in the Preliminary Part V Booklet, for consideration by An Bord Pleanála.

Correspondence from the Housing Department and, specifically, an indicative Part V agreement letter is also included in this brochure confirming the acceptability in principle of proposals.



On 10th November 2021, a Strategic Housing Development pre-application request was submitted to An Bord Pleanála. Reference ABP-311917-21 refers.

The pre-application development proposal consisted of 400 no. residential apartments, residential amenity facilities and a new creche facility. A comprehensive pre-application request was submitted to An Bord Pleanála setting out the basis on which the pre-application request could be favourably considered.

The key changes between the pre-application proposal and the proposed development which forms the subject matter of this application for permission relate to:

1. Architectural Design Approach – Further justification for increased heights/higher density in this location.
2. Connectivity – Further justification for increased heights and higher densities at this location, based on connectivity, capacity and frequency of public transport.

7.1 Planning Authority Opinion

As part of this pre-application process, Dun Laoghaire Rathdown County Council issued an opinion of the proposal, dated 7th December 2021.

7.2 Pre-Application Consultation Meeting

A tri-partite pre-application consultation meeting was convened to discuss the proposal on 8th February 2022. Representatives from An Bord Pleanála, Dun Laoghaire Rathdown County Council and the Applicant attended this meeting.

7.3 An Bord Pleanála Opinion

Following consideration of the pre-application request, opinion of the planning authority and the matters raised at the tri-partite pre-application consultation meeting, An Bord Pleanála issued its Opinion on 17th May 2022. Having considered the issues raised during the pre-application consultation process, the Board's opinion was that the documents submitted with the request required **further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.**

The Board outlined issues that needed to be addressed in order to constitute a reasonable basis for an application for permission. Specific information was also requested to be submitted with the application. A separate report has been prepared addressing the issues raised and outlining the specific information submitted. As appears from that Response to Opinion of An Bord Pleanála, all issues raised in the Board's Opinion as requiring further consideration and amendment have now been addressed. All prescribed bodies have been notified of the lodgement of this application as appropriate.

8 DESCRIPTION OF PROPOSED DEVELOPMENT

8.1 Overview of Proposed Development

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

- Block A1 (4 storeys) comprising 18 no. apartments (3 no. 1 bed units and 15 no. 2 bed units); a crèche facility of approx. 401 sq. m with associated outdoor play space of approx. 20 sq. m; and resident amenity facilities of approx. 30 sq. m.
- Block A2 (3-4 storeys) comprising 24 no. apartments (2 no. 1 bed units and 22 no. 2 bed units) and resident amenity facilities of approx. 390m2.
- Blocks B1 and B2 (2-6 storeys) comprising 69 no. apartments (30 no. 1 bed units, 34 no. 2 bed units, 5 no. 3 bed units).
- Blocks B3 and B4 (2-6 storeys) comprising 62 no. apartments (30 no. 1 bed units, 27 no. 2 bed units and 5 no. 3 bed units).
- Blocks C1, C2 and C3 (3-6 storeys) comprising 187 no. apartments (58 no. 1 bed units, 126 no. 2 bed units and 3 no. 3 bed units); and resident amenity facilities of approx. 187.5 sq. m.

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

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

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

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

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

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

8.2 Key Site Statistics

In summary, the key statistic for the proposed development is outlined below:

Key Site Statistics	
Total Number of Units	360
Site Area	37,041 sq.m
Total Development Area	46,474 sq.m
Density	97.3 units per ha
Unit Mix	123 x 1 Bedroom Units (34%) 224 x 2 Bedroom Units (62%) 13 x 3 Bedroom Units (4%)
Open Space	22,033 sq.m
Communal Open Space	5,008 sq.m
Public Open Space	17,025 sq. m
Resident amenity space	607 sq.m
Childcare Space	401 sq.m
Part V	36 units
Car Parking Spaces	419
Cycling Spaces	970
Plot Ratio	1.11
Site coverage (inc. podium areas)	39.3%
Site coverage (exc. podium areas)	23.8%

Table 5 - Key Site statistics

The proposed development is an architecturally designed residential scheme, which will provide homes for a range of household types and will support the viability of local services in Sandyford Village.

The proposed development achieves a new density of approximately 97.3 units per hectare. The subject site is strategically located in close proximity to the established area of Sandyford village, with good public transport services connecting it to Sandyford, Blackrock, Dun Laoghaire, Dundrum, and Dublin City Centre. The Glencairn Luas stop is approximately 1.9km away and 2 no. bus stops are present on the northern site boundary operating on Blackglen Road.

8.3 Design Rationale

OMP Architects have prepared a detailed Design Statement which sets out their considered approach to this unique site. We trust the Board will have regard to the site analysis and concept design details which have informed the scheme now presented for consideration. At the outset, the design approach to this site has sought to respond and sensitively integrate the proposed development into and around the natural rolling hillside landscape. The aim is to create a unique environment and sense of place combined with high quality architecture which responds directly to the unique characteristics of the site. The design response can be broken down into 4 distinct character areas as follows:

- A. **Blackglen Road Streetscape** - The cluster of entrance buildings off Blackglen road respect the building line of the existing cottages while forming a framed entrance to the development centred around an 'Arrival Court' which is activated by ground level resident amenities and a childcare facility. From this point, a series of tree trails wind up through the hillside allowing opportunities for connecting various pathways through the landscape.
- B. **Lower Hillside** - The arrival experience follows a primary road along the Eastern edge which characterises the Lower hillside area with buildings stepped into the natural contours and offering glimpses of the hillside beyond. As you turn the bend, a promontory spot is anchored by an expansion of the landscape with the main public open space to the east and a playground to the west of the road, this zone acts as a transition between the lower hillside and the upper hillside character areas. Situated at the bend in the road this parkland landscape creates a communal focal point in the heart of the scheme.
- C. **Upper Hillside** - The upper hillside to the Southwest is characterised by 3 'finger type' buildings which crank in there geometry to enclose views back down over the open space and towards Dublin bay. These buildings step down in scale towards the Northern edge and interface with the existing dwellings.
- D. **Central Parkland** - This edge is formed by the tree trail which is set within a new woodland belt which permeates into the communal open spaces between the buildings providing a green lung to the development while also reinforcing the strong relationship between the architecture and the landscape.

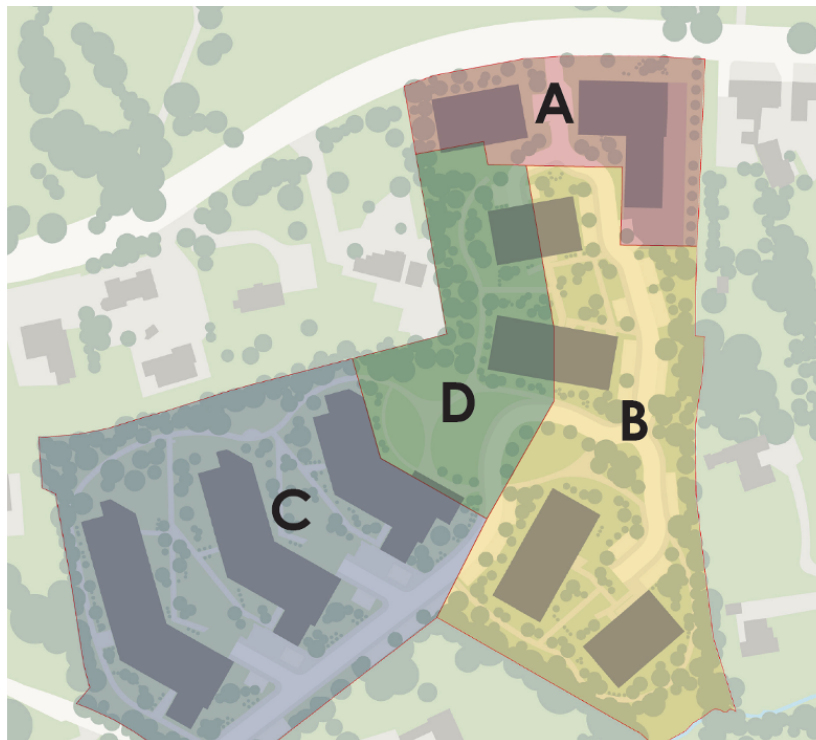


Figure 10 - Site Character Areas

8.4 Separation Distances

The overall building form and layout is set up by a series of key adjacencies and continuation of existing building lines. These set up a series of building blocks, each responding to different conditions. In addition to the considerable setback distances provided at upper levels, the visual impact from Blackglen Road is diminished by the presence of existing mature tree belts which provides a continuous 'green veil' along the Northern and Eastern boundary of the site.



Figure 11 - Separation Distances

The separation distances between the proposed development and the surrounding Blackglen Road adjacent properties to the North are 12m at a podium level and 20m between adjacent residential windows.

In addition to the considerable setback distance provided along the North Eastern boundary, the visual impact from Blackglen Road is diminished further by the presence of the existing tree belt which provides a continuous 'green veil' along the East, South and Western boundaries to the site.

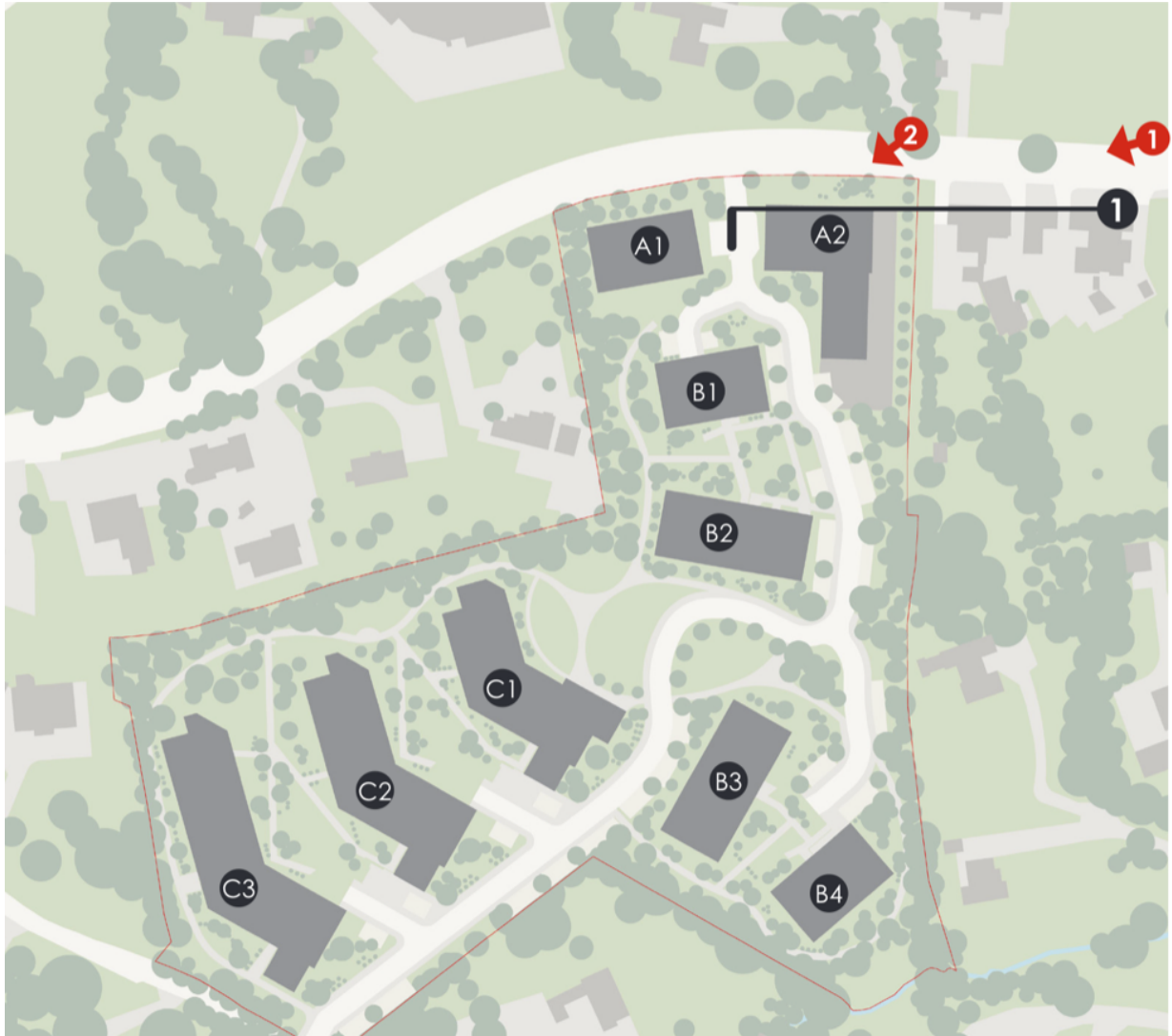


Figure 12 - Block Key Plan

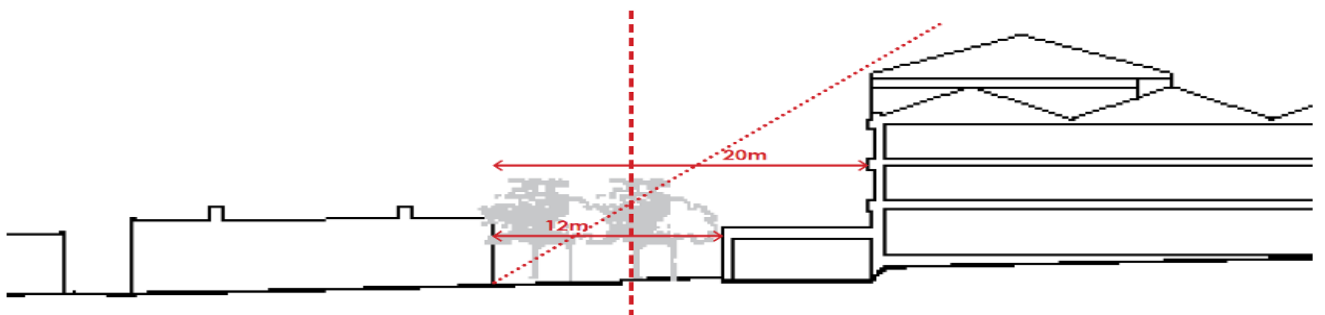


Figure 13 - Separation distance to the North



Plate 2 - View 1 as noted in figure 12 above



Plate 1 - View 2 as noted in figure 12 above

The separation distances between the proposed development and the surrounding Blackglen Road properties to the East are 40m. In addition to the considerable setback distance provided along the Northern boundary, the visual impact of the proposal is reduced with the three storey shoulder height facing East towards the neighbouring property.

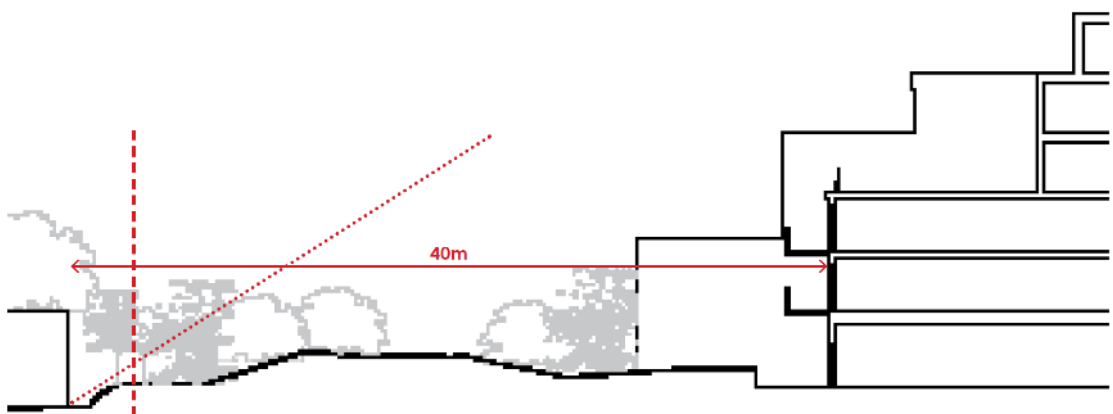


Figure 14 - Separation distance to the East

The separation distances between the proposed development and the surrounding Blackglen Road properties to the North are 33m. In addition to the considerable setback distance provided along the Northern boundary, the visual impact from Blackglen Road is diminished further by the presence of the existing mature tree belt which provides a continuous 'green veil' along the Northern and Eastern boundary to the site.

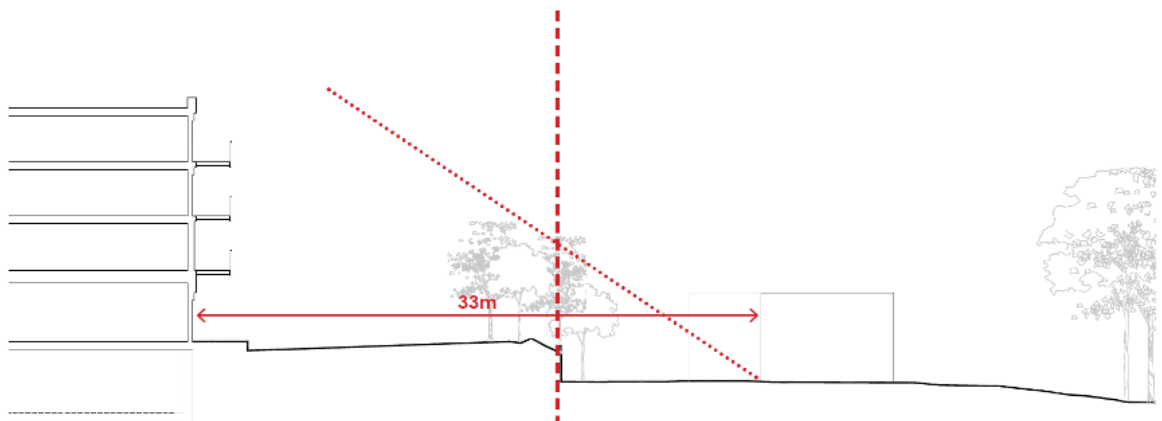
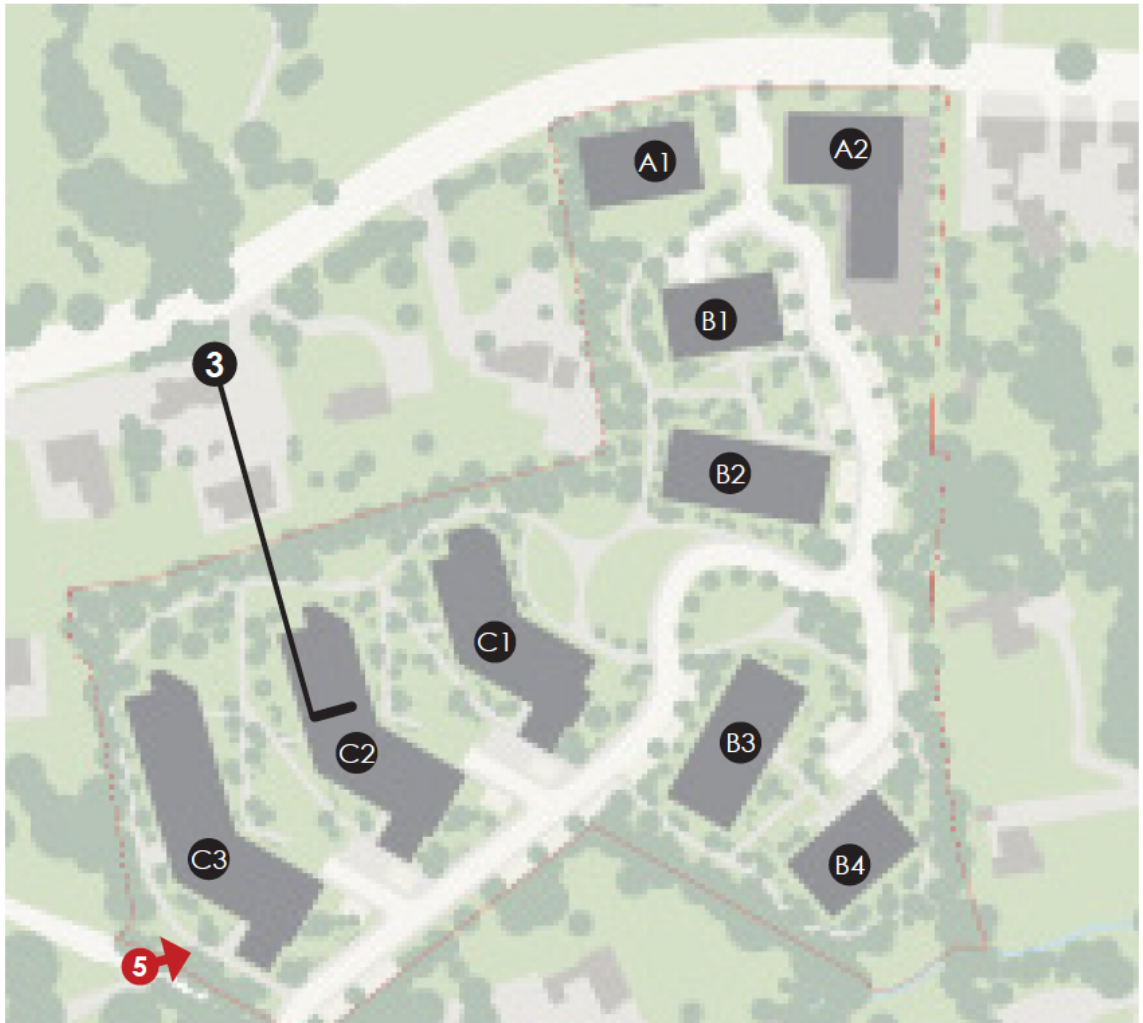


Figure 15 - Separation distance to the North

8.5 Residential Mix

The residential development mix provides for 360 no. units as follows:

- 123 x 1 Bedroom Units (34%)
- 224 x 2 Bedroom Units (62%)
- 13 x 3 Bedroom Units (4%)

8.6 Residential Density

A residential density of 97.3 units per ha is proposed on this site. The density is based on 360 units over the 3.7ha site. We refer the Board to the enclosed Housing Quality Assessment provided by O'Mahony Pike Architects for further details.

The density proposed is considered acceptable given the mandate in National Planning Policy and the connectivity to public transport within walking distance to the site. The Glencairn LUAS stop with park and ride on the Green line is 1.9km or a 9-minute cycle from the site. In addition, there are also 2 no. Dublin Bus stops within 120m of the site.

We submit that this density is appropriate given the Sustainable Residential Development in Urban Areas Planning Guidelines (2009), which provide for increased densities on 'Outer Suburban / Infill sites', as is the site at Blackglen Road.

In addition, the site is well located so as to avail of a number of public transport services in the immediate area. There are bus connections available in the area, including on Blackglen Road itself:

- Glencairn LUAS – 1.9km / 9-minute cycle
- Sandymount Business District - 2.1km / 27 min walk
- Lamb's Cross Neighbourhood Centre – 400m east
- 44 Bus Route to City Centre & DCU – 1.2km / 14 min walk
- 47 Bus route to City Centre via UCD – 1.2km / 14 min walk.
- 44B Bus Route to Dundrum Luas Stop – 120m
- 114 Bus Route to Blackrock Dart station – 120m

Presently there are no cycle lanes or footpaths along the majority of Blackglen Road. However, the Blackglen Road Improvement Scheme (currently under construction) will greatly improve the pedestrian, bus, and cycle facilities at this location.

The Glencairn LUAS stop is located 1.9km of the proposed development site, and there are 2 no. bus stops present on the Blackglen Road. As a result, the site is considered an Intermediate Urban Location in the context of the Design Standards for New Apartment Guidelines.

In line with Sustainable Residential Development in Urban Areas Guidelines, a minimum density of 35-50 no. units per ha should therefore be achieved on the subject lands. The guidelines do not prescribe an upper limit in terms of residential density. The ultimate density achieved will take account of the prevailing density in the area also.

8.7 Childcare Facility

A childcare facility of c. 401 sq. m is proposed in 4 storey Block A1. The Creche has been designed to have capacity for the childcare needs of the proposed development and is located at the entrance of the development, to facilitate ease of access. The creche is afforded appropriate outdoor play space and car parking to serve staff and drop off.

According to the County Development Plan 2022-2028, childcare parking provision is based on the Gross Floor Area of 1 space per 40. The requirement for the proposed Childcare Facility is 10 car parking space, which will be provided at podium level of the proposed development.

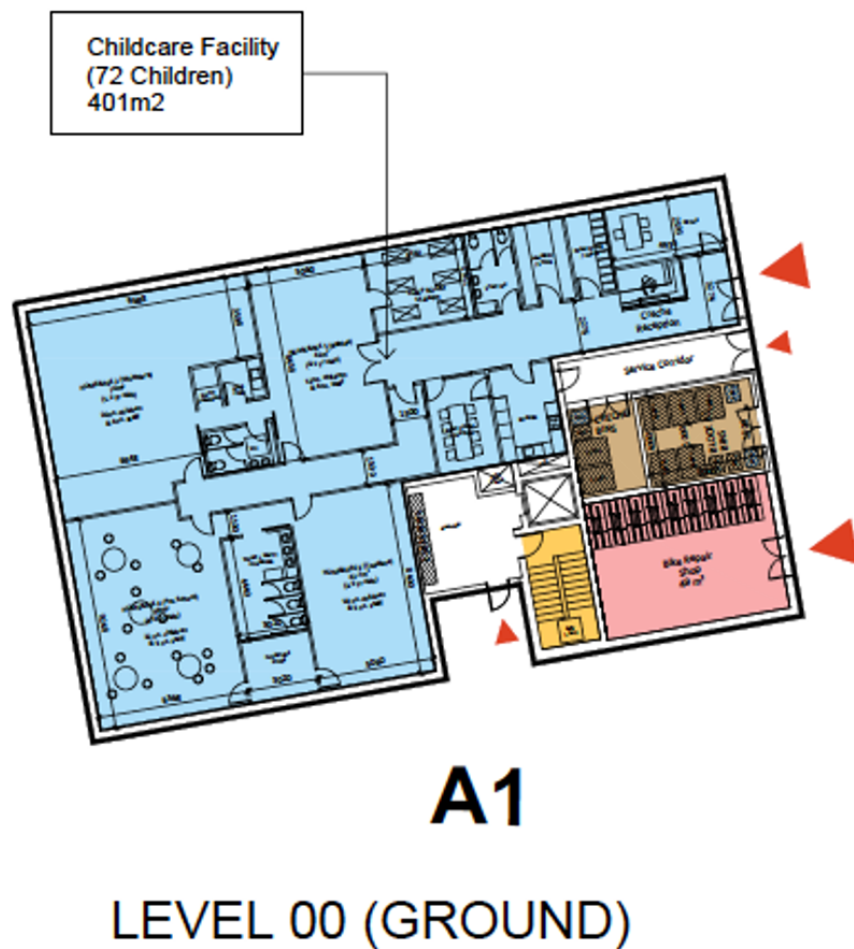


Figure 16 - Ground Floor of Proposed Childcare Facility

6.4 Landscaping and Open Space

We refer the Board to the enclosed drawings and Design Statement prepared by Gannon + Associates, Landscape Architects.

The Design Statement demonstrates that the scheme prepared for this development is founded on a strong awareness of the site context and the established landscape character. The subject site is defined by its location as a transitional zone geographically and ecologically, and it has been a guiding principle in the landscape design of the proposed development to work symbiotically with this transition. It is proposed to work with this guiding characteristic of the site in order to create a unique landscape that is in keeping with the landscape character of the area and can act to promote and facilitate biodiversity, learning opportunities and a unique, aesthetic and amenity resource for the future residents and the wider public as a whole.

The site is also a transitional zone ecologically between the lowlands of Fitzsimons Wood and the existing Oak Holly, Birch vegetation therein and the uplands of the Dublin Mountains. The landscape design of the proposed site aims to accentuate this transition and proposes that the planting scheme will transition mid-way through the site from the lowland Oak Holly and Birch vegetation to the upland Gorse, Heather and Pine.

We trust the Board will note that a key component of the landscape design of the proposed development is to create a landscape that is of the land and landscape character of the wider receiving environment. As detailed on the enclosed drawings, the scheme uses an indigenous planting palette of hard and soft landscaping from locally sourced granite to a native Irish planting scheme.

The proposed landscape design aims to bed the built structures into the landscape allowing these built forms to be read as part of the architectural morphology of the area with a mature and verdant landscape scheme on implementation. This strategy will be achievable through rich and densely planted communal open space at podium level of the blocks providing a green gateway across the site that anchors the built forms as part of the landscape.

The communal open space landscaped areas fold into the natural topography and connect all blocks with the primary pedestrian route in the form of the Green Ribbon. This is a place making, way finding key element of the landscape design of the site which creates a unique sense of place, defines natural and amenity spaces and encourages interactions through play, fitness, rest, and education.

The distribution of built forms on the site is inspired by the Clachan settlement patterns and the landscape design proposal reflects and enhances this by creating a sustainable, liveable and local community centered around the primary landscaped heart of the development. Cultivating interaction and stimulating ownership the key aim of creating an inspiring sense of place has been achieved by a strong, deliberate and legible concept, tied together by “The Green Ribbon” creating:

- A unique sense of place and identity and a high quality environment
- An inspiring landscape that is both multi-functional and beautiful
- A landscape the responds to the local landscape character and integrates into the wider landscape context
- A permeable landscape layout assisting the natural movement of people within and across the site
- A proposal that promotes and contributes to the wider biodiversity
- A legible hierarchy of public open space
- A design language that responds to the proposed architecture

Total Open Space Provision is identified as 22,033 sq.m with the provision is broken down as follows:

- Communal Open Space 5,008 sq.m
- Public Open Space 17,022 sq. m



Figure 17 -Proposed Public Open space Provision

The proposed new public open green space has been intentionally integrated into the surrounding areas green infrastructure with new pedestrian access proposed along Blackglenn Road and Woodside Road, creating a possibility for a future connection between FitzSimons's Wood and Ticknock mountains.

The public open space within this development is of exceptional quality given the location of the main area of open space within the development. The provision of 17,025 sq.m exceeds the minimum 10% Development Plan Requirement as set out below:

DLR Requirements

- DLR Requirement – 10% of site area (as a minimum)
- Main Development Site – 37,041sq.m.
- Proposed Open Space – 22,033 sq.m.

In addition, we note that the overall public space proposal of 17,025sq.m meets with the requirements of the Apartment Guidelines 2020 as follows:

Apartment Guideline Requirements

5 sq.m. for 1 bed units – 123 x 5 sq.m. = 615 sq.m.

7 sq.m. for 2 bed units - 224 x 7 sq.m. = 1,568 sq.m.

9 sq.m for 3 bed units - 13 x 9 sq.m = 117 sq.m.

Total Public Open Space Required = 2,300 sq.m.

We note the following comment from the daylight and sunlight analysis prepared by O'Connor Sutton Cronin Consulting Engineers:

“Table below outlines the percentage of amenity space receiving at least 2 hours sunlight on March 21st. The communal amenity space receives the recommended values in more than 50% of the area, therefore, compliance with BRE Guidelines is achieved (Page59).

Garden	Percentage of area receiving ≥ 2hours sunlight on March 21 st	Meets compliance with BRE Guidelines
Amenity Space	95%	Y

As evidenced above, the central area of open space 17,025sq. m receives appropriate sunlight, which is the key area of open space.

8.5 Trees & Hedgerows

We refer the Board to the enclosed Tree Survey & Report prepared by Enviroguide Consulting. The Report notes that the site largely features hedgerows (native and ornamental), with trees located around the boundaries. All trees bordering the site will be protected as identified by the project arborist. The proposed development will entail the removal of 9 no. trees from the site and the implementation of 306 new trees in and around the site. This is detailed in a new landscape masterplan, prepared by Gannon & Associates.

The existing boundary planting conditions with the adjoining neighbours to the development will be maintained and augmented with a native Irish hedgerow mix of Hawthorn, Blackthorn, Holly, Dog Rose and Hazel giving the site a unique ecotone that relates to the landscape character of the site. A simple timber post and rail fence with dog proof mesh to a height of 1.2m will define these boundaries.

Overall, the Proposed Development will see a significant increase in tree cover at the Site, with native species making up the bulk of this through the proposed wooded margins of the development.

8.6 Ecology

We refer the Board to the enclosed Ecological Impact Assessment prepared by Enviroguide. The Assessment sets out that the necessary ecological surveys have been carried out in order to assess the impact of the proposed development. The surveys undertaken are noted as follows:

- Habitat & Invasive Flora
- Bats
- Breeding Birds
- Mammal Surveys
- Other Fauna

Enviroguide conclude that the Proposed Development will result in the loss and replacement of the majority of the scrub, bracken and grassland currently present within site. This habitat type is not considered to be of value at a local scale, and its loss will not constitute a significant negative impact as a result of the Proposed Development.

An overall increase in native tree cover is proposed at the Site. The landscape plan entails retention of the majority of treelines and boundary habitats at the Site, along with a native woodland margin proposed for the boundary of the Site. The overall approach is not to have a particularly ‘manicured’ new landscape, but to have a sustainable and appropriate mix of native planting that will contribute positively the biodiversity of the area.

It is therefore concluded that the Proposed Development will result in an overall positive impact through the increase in native tree cover at the Site. This general increase in the quality and provision of habitats at the Site of the Proposed Development represents a **positive, permanent**, impact overall.

There is also the opportunity for further biodiversity enhancement through the extensive planting of pollinator friendly flower and shrub species where possible; that will benefit bees and suburban pollinator species, along with birds and local bats through an increased availability of prey.

The Bat Surveys indicate overall moderate usage of the site by bats and mitigation measures are therefore recommended including 12 no. Bat boxes which will be erected around the site, during the operational phase of the Proposed Development, to provide novel habitat for local bat species. A qualified Ecologist will be consulted with regards the appropriate type and placement/location of these Rocket boxes.

This provision of roosting habitat at the Site will complement the increased foraging opportunities that will be provided at the Site, in the form of the proposed landscape planting included in the project design.

The impact of increased night-time lighting as a result of the Proposed Development will be mitigated through the incorporation of bat-friendly lighting measures into the project design and associated lighting plan.

In order to minimise disturbance to bats commuting/foraging in the vicinity of the Site, lighting will be designed to minimise light-spill onto boundary vegetation at the Site, which were observed to provide important and well-used bat foraging commuting habitat during the bat surveys of the Site in 2021.

With regard to birds the majority of species recorded in the vicinity of the Site of the Proposed Development were common hedgerow species either flying overhead or foraging across the Site.

Overall it is noted Enviroguide conclude that provided the mitigation measures proposed are implemented in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development. Furthermore, it is noted that the Proposed Development will have an overall positive impact on the ecology at the Site through the increased provision and enhancement of habitats at the Site of the Proposed Development.

8.6.1 FitzSimons’s Wood

The ECIA notes that the nearest pNHA to the Proposed Development is the FitzSimons’s Wood pNHA located c.110m to the north. The Proposed Development maintains no significant impact pathway with this pNHA, hydrological or otherwise, however, increased recreational use of the FitzSimons’s Woods pNHA is likely to occur as a result of the increase in population in the area as a result of the Proposed Development.

8.7 Screening for Appropriate Assessment

We refer the Board to the enclosed Screening for Appropriate Assessment Report prepared by Enviroguide. The Proposed Development has been assessed taking into account:

- the nature, size and location of the proposed works and possible impacts arising from the construction works.
- the qualifying interests and conservation objectives of the European Sites.
- the potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it was concluded by the authors of the report that, on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the following European Sites identified as maintaining a potential impact pathway with the Proposed Development, listed below:

- North Dublin Bay SAC
- Rockabill to Dalkey Island SAC
- North Bull Island SPA
- Dalkey Island SPA

Further to the screening exercise, it was concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, **can be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process, and the preparation of a Natura Impact Statement (NIS) is not required.

8.8 Building Height

The development has a general shoulder height of 6 storeys, with stepped variations responding to the specific site context. This considered design approach results in heights of 1 to 3 storeys at sensitive locations to a central marker building extending to 6 storeys in the heart of the scheme. The heights proposed can be demonstrated as follows:



Figure 18 - Proposals for Building Height

Proposals for height are considered to align with the national policy mandate to increase height and densities at appropriate locations. Specifically, the Building Height Guidelines (2018) set out that there is a presumption in favour of buildings of increased height in locations with good public transport accessibility. Blanket numerical limitations on height should be avoided and a set of Development Management Criteria should be applied to test the appropriateness of the heights proposed.

The current design has considered this context and has sought to deliver height ranging overall from 1-6 storeys. As detailed by OMP Architects, the height strategy is carefully considered, to respond to the hillside context and to protect established levels of residential amenity. We refer the Board to Section 4.4 of the OMP Design Statement, which clearly articulates the well-considered approach to height.

8.9 Landscape & Visual Impact

The visual impact of the proposed development is a significant consideration and a range of photomontage views have been prepared by Modelworks to demonstrate the impact of the proposed development. These views have been assessed in a comprehensive Landscape & Visual Impact Assessment. We note key findings as follows:

- Within the established footprint of Dublin City, the receiving environment is best characterised as “Intermediate Urban Location”. The urban-generated, low density development occurred piecemeal over the course of the 20th century. There is thus no established, valued landscape character; the area is in a transitional stage between rural and urban.
- There is a related weakness in the boundary between the urban and rural landscapes in the site environs. This is emphasised by the comparatively strong/legible boundary to the east and west, where urban consolidation/densification has taken place right up to the edge of the urban area.
- A combination of DLRDP zoning objectives - including the (a) the site’s zoning, (b) the residential zoning of a broad belt of land on the north side of Blackglen Road between the site and Lamb’s Cross, (c) the expansion of Lamb’s Cross into a substantial urban core, (d) the impending Blackglen Road Improvement Scheme, (e) the provision of a QBC from Lamb’s Cross over the M50, and (f) the provision of extensive areas of open space in the locality – will transform the landscape character of the receiving environment. In this planned future scenario Blackglen Road will form the spine through a consolidated and evolved urban area, served by a substantial mixed use urban neighbourhood centre, high frequency public transport and a range of open spaces.
- The existing peri-urban development pattern cannot be considered sustainable and the area is due to undergo substantial, planned change (facilitated by the DLRDP).
- It is county level and national policy to consolidate and densify the urban area to make the most efficient possible use of physical and social infrastructure. The implication of this is that new high density typologies - i.e. taller buildings - will be introduced to previously low density areas, unavoidably changing their character and the composition of views from the public realm and private property.

The LVIA Assessment concludes:

“The landscape sensitivity of the receiving environment can be classified as medium. This classification takes account of the following main factors:

- The site is an infill site within the boundary of the Dun Laoghaire Rathdown urban area and is zoned for residential development.
- The site’s receiving environment – The Blackglen Road Corridor west of Lambs Cross and the triangle of land between Blackglen Road and Woodside Road – is peri-urban in character as opposed to suburban. The urban-generated, low-density development occurred piecemeal over the course of the 20th century. There is thus no established, valued landscape character; the area is in an unsustainable, transitional stage between rural and urban.
- There is a related weakness in the boundary between the urban and rural landscapes in the site environs. This is emphasised by the comparatively strong/legible boundary to the east and west, where urban consolidation/densification has taken place right up to the edge of the urban area.
- A combination of DLR Development Plan zoning objectives – including the (a) the site’s zoning, (b) the residential zoning of a broad belt of land on the north side of Blackglen Road between the site and Lamb’s Cross into a substantial urban core, (d) Blackglen Road Improvement Scheme, and (e) the provision of extensive areas of open space in the locality – will transform the landscape character of the receiving environment. In this planned future scenario Blackglen

Road will form the spine through a consolidated and evolved urban area, served by a substantial mixed use urban neighbourhood centre, bus services and a range of open spaces.

- At 3.7ha the site is of a scale that its development can: - establish (or contribute to the establishment of) a new context, i.e., contribute to the evolution of the receiving environment as opposed to being perceived an anomaly within it, and protect the neighbouring properties by (a) setting buildings back from the boundaries, (b) stepping down in height towards the boundaries, and (c) introducing broad belts of screening vegetation inside the boundaries to protect the neighbouring houses' amenities.
- In the wider area there are examples of high-density development a similar distance from neighbourhood centres and from the M50, and at similar elevation to the site (e.g., Clon Brugh, Parkview and Belarmine). The main difference between these developments and the site is their position adjacent to the Enniskerry Road. The Blackglen Road Improvement Scheme will result in the road being of urban character (as a streetscape) and capacity, facilitating pedestrian and cycle movement and the use of public transport, tying the adjacent lands into the urban area. The site context will then be similar to that of the aforementioned developments – although with an as yet unconsolidated urban structure.
- The main sensitivities in the area are the existing low density residential properties to the east and west along Blackglen Road, to the southeast in the Slate Cabin Lane area, and along Woodside Road. While low density residential use is generally sensitive to the introduction of higher density development typologies, there are factors that indicate there is some capacity (and requirement) to accommodate change:
 - Generally, the existing houses' amenities derive principally from (a) their detached typology and large size, (b) their correspondingly large gardens which are well vegetated, limiting visibility of the surroundings apart from framed views, (c) the views north over Dun Laoghaire Rathdown towards Dublin Bay afforded by their elevation, and (d) the generally high degree of visual enclosure generated by the quantity of trees in the area. The proposed development generally does not threaten any of these conditions.
 - The existing peri-urban development pattern cannot be considered sustainable, and the area is due to undergo substantial, planned change.
 - It is county-level and national policy to consolidate and densify the urban area to make the most efficient possible use of physical and social infrastructure. The implication of this is that new high-density typologies - i.e., taller buildings - will be introduced to previously low-density areas, unavoidably changing their character and the composition of views from the public realm and private property.
- Considered at the local scale the magnitude of change to the landscape would be high.
 The proposed development would see the introduction of a cluster of buildings of contemporary urban typology, scale and architecture in a framework of open space and screening vegetation to a large site in the currently low density, peri-urban landscape. In combination with the Blackglen Road Improvement Scheme it would initiate a shift in the character of the area towards a more urban condition. While different in typology from the existing development in the area, the proposal is demonstrably responsive to the sensitivities in the immediate receiving environment. The buildings and landscape are also of appreciably high design and material quality.

- Considered at the wider scale the magnitude of change to the landscape would be low.
The development's contribution to the consolidation of the urban area between Blackglen Road and Woodside Road would strengthen the boundary between Dun Laoghaire Rathdown's urban and rural landscapes. It would complement the already consolidated urban area and defined urban edge that exists to the east and west. The change would thus not be out of character with the trend in the wider area. Such a strong, legible boundary between the urban and rural landscapes is a positive quality both from a landscape character perspective and the sustainable development perspective."

8.10 Residential Amenity Building

Block A2 contains resident amenity space of 607 sq.m. This building is conveniently located at the Blackglen Road entrance and is designed to provide a range of services to future residents.

8.11 Dual Aspect

The scheme provides 50% Dual Aspect units. We note specifically that a total of 181 out of the 360 no. units proposed delivers dual aspect. We refer The Board to Appendix C of the Design Statement prepared by O'Mahony Pike for detailed design on the proposed Dual Aspect Units.

8.12 Car Parking

The proposed development will provide for a total of 419 no. car parking spaces. A total of 317 spaces are proposed at basement level, with 102 at surface level. The car parking provision delivers a ratio of 1:16, which is considered an appropriate provision for this site. The design team have considered this issue in some detail and the proposal strikes a balance between the planning policy objectives to reduce reliance on the private car with the promotion of sustainable modes and the location of the site as an 'intermediate urban location'.

Intermediate urban locations are defined in the Apartment Guidelines by the following criteria:

- Sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e., between 10-15 minutes or 1000- 1500m) of high-capacity urban public transport stops or within reasonable walking distance (i.e., between 5-10 minutes or up to 1000m) of high frequency urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e., up to 5 minutes or 400- 500m) of reasonably frequent urban bus services.

The Blackglen site is within 1900m of the Glencairn Luas line, although this is slightly further than the recommended 1500m, the site is a well-connected location with bus services and a walkable distance to the Luas.

8.12.1 Car Club

As noted in the Traffic Impact Assessment prepared by OCSC, local Census data has shown that regular car based travel is lower than normal in this area meaning the need for car parking is naturally reduced. However, it is acknowledged that there may potentially still be demand for such occasional trips by car. On that basis, one of the key proposals within the Mobility Management Plan for the site is the potential for provision of car club vehicles. This will be based on a survey of residents to establish if such a demand exists and, if so, subsequently engage with a car club operator with a view to setting up a station for one or more car club vehicles on-site.

8.13 Cycle Parking

High quality cycle parking is proposed at the development. The Apartment Guidelines state a requirement of 1 cycle parking space per bedroom and 0.5 space per unit, this equates to a requirement of 792 cycle parking spaces.

The Local Development Plan requires 1 cycle parking space per unit and 1 cycle parking spaces per 5 units for visitors. This equates to a total of 432 cycle parking spaces. The current allocation of cycle parking is for 970 cycle parking spaces. The current quantum of cycle parking is above the requirements of the DLRCC development plan 2022-202.

A total of 970 bicycle spaces (740 long term and 230 short term) are proposed. The visitor spaces will consist of Sheffield stands integrated within the external landscaping in convenient locations around the site, and the long- term spaces will consist of secure bike enclosures serving the blocks and distributed accordingly. While this is above the requirements of both the DLRCC and the apartment guidelines we are of the opinion that this increased level of cycle parking is intended to further facilitate a positive modal shift away from a dependency on car travel.

8.13.1 Cargo Bicycles & Workshop

The development will provide a Cargo Bike service, as well as an on-site bicycle workshop. The Cargo Bike service will be highlighted to residents with associated information on how to register, how the system operates and cost of use.

The bike workshop, which includes facilities such as air pumps and repair tools will be available for use by residents of the development. This emphasis on cycling and sustainable transport should assist in reducing car usage in the development.

8.14 Mobility Management Plan

We refer the Board to the enclosed Mobility Management Plan prepared by OCSC.

This plan is being prepared as a transportation demand management tool for the site. This will have the aim of reducing car use and the need for car use at the site, by increasing the attractiveness and practicality of other modes of transport.

The MMP targets set out therein will take account of future potential improvements in public transport provision over and above those currently in operation. In this context, the MMP will set targets into the future which will be flexible and reflective of the maximum achievable modal split at any time dependent on a variety of factors including actual local infrastructure and other facilities available.

8.15 Part V

Part V proposal provides for 36 units, (10% of the total 360 no. units), which meets the social housing requirements of Dun Laoghaire Rathdown County Council. Please refer to the Part V Brochure submitted by O'Mahony Pike with this application.

8.16 Protection of Established Residential Amenity

This greenfield site has been zoned and vacant for nearly 40 years, as large one off dwellings on single sites were developed along Blackglen and Woodside Road. This typology of housing represents inefficient use of zoned and serviced lands and the infilling of the vacant site with more efficient apartment units, is considered appropriate and fully aligns with the principles of sustainable planning.

However, there will be a notable change in character for residents bounding the site and the design team has been inherently mindful of the need to protect residential amenity in the development of the scheme. A key principle has been to avoid long monotonous 'walls' of development and to ensure the

placement of blocks allows for key views to be maintained. Blocks have been sited through extensive testing for impact in terms of shadow and access to daylight.

The boundaries to the site feature heavy planting, which will be a mix of existing and new proposed native trees. The planting will provide a tree trail through the site for the enjoyment of residents, allow for the continuity of a wildlife corridor and providing screening to mitigate the visual change arising from the development for existing residents.

As noted by OMP Architects, blocks within the scheme step down in height to respect the neighbouring residents, with built edges generally 3 to 4 storeys in height.

The enclosed site plan demonstrates generous separation distances to neighbouring properties, with balconies carefully sited to avoid instances of direct overlooking.

8.17 Daylight and Sunlight

In terms of any perceived impact on Daylight and Sunlight to adjoining properties, the proposed development and associated proposed open spaces, we note that a detailed daylight and sunlight report is enclosed herewith from O' Conor Sutton Cronin Consulting Engineers. Please refer to the Daylight, Sunlight & Overshadowing Report for full details of the assessment.

This report is exceptionally positive, and we note the following key conclusions from the document:

Internal daylight within the proposed development

"The analysis confirms that across the entire development excellent levels of internal daylight are achieved. The majority of apartments not only meet but greatly exceed the recommendations outlined within the BRE Guidelines and British Standard BS8206, achieving a 99.3 %compliance rate across the proposed apartments. Similarly, when compared against the 2022 Methodology, third edition of the same document, a pass rate of 94.5% has been achieved across the development." (Page 90)

Sunlight to proposed development amenity spaces

"In terms of sunlight access, excellent levels of sunlight are experienced across the proposed development. The communal amenity spaces provided exceed the BRE guidelines for sunlight on the test day of 21st of March". (Page 91)

Sunlight to windows within the proposed development

"The annual probable sunlight hours assessment has shown that 60% of windows across the development achieve the recommended APSH values stated in the BRE Guidelines, while 62% of windows achieve the recommended values during the winter months, when sunlight is more valuable". (Page 91)

Impact to surrounding properties

"The analysis has shown that negligible impact will be perceived in terms of daylight access to any of the surrounding properties.

The overshadowing images have demonstrated that the only impact to adjacent properties will be to those located to the East of the proposed development. A minimal impact will be perceived on March 21st after 3 p.m". (Page 91)

Overall, it can be concluded that the scheme design is supported in terms of access to daylight and sunlight with no significant impacts within the development or to adjoining dwellings.

8.18 Wind Assessment

We refer the Board to the enclosed Pedestrian Wind Comfort Assessment prepared by OCSC. The purpose of this assessment is to outline the predicted climatic wind conditions experienced within and surrounding the proposed development.

The proposed method for compliance validation is via the industry best practice standard for pedestrian comfort (Lawson Criteria). The Lawson Criteria sets acceptable levels of wind speed and velocity for various human activities.

Given the specific location of the building and recorded metrological data available for the area, and standard interpolation calculation procedures, it is possible to predict the expected wind speeds and their annual occurrence.

“A conscious effort was made by the design team during the design stages to mitigate the risk of localised increased wind speed conditions due to the proposed development. The introduction of mitigation measures such as the amenity areas location, as well as the strategic location of extensive landscaping, all assist in reducing the potential development of local increased wind speed and the negative impact on local climatic conditions.

Based on the CFD modelling results, the proposed development will be a comfortable environment for occupants. Some areas will present slightly higher wind speeds, however, these concerns have been largely addressed through the incorporation of landscaping which will mitigate excessive wind speeds in these areas.

Overall, the proposed development will be a high-quality, comfortable environment for occupants throughout the year. (page 23)”

8.19 Services

Sustainable Drainage

It is proposed to provide an independent surface water network, in order to serve the development and limit the discharge from the site to the greenfield equivalent rate. The surface water drainage system is to be designed in accordance with the GDSDS and the Dun Laoghaire Rathdown County Development Plan 2022-2028.

The following sustainable drainage systems are to be considered as part of an integrated drainage landscaping design:

- Green Roof (Extensive Green Roof 63%, Intensive Green Roof 12%);
- Pervious Paving to car parking and pedestrian routes/ areas at surface level;
- Open grade attenuation to be provided on podiums;
- Filter drains and Bio-Retention, where practical;
- Swales to be provided where practical for conveyance and temporary storage;
- Silt traps to be provided in manholes immediately upstream of attenuation, to act as further preventative measure for removing silt and gross pollutants;
- Flow control to limit discharge to greenfield equivalent.
- Class 1 bypass fuel separator to be provided downstream of the attenuation prior to discharging to public sewer.

Due to poor infiltration rates and high level of the granite bed rock, it is not feasible to provide interception storage along with the attenuation storage.

All runoff is to be collected and directed to the northern boundary of the site, this follows the natural gradient of the site.

Water and Waste Water Strategy

Consultation with Irish Water has been carried out for the water and wastewater development to ensure there is capacity in the network to facilitate development. It is proposed to separate the surface water and wastewater drainage networks, which will serve the proposed development, and provide independent connections to the surface water sewer and local wastewater sewer networks, respectively.

As part of the upgrade works to the Blackglan Road, upgrading of existing 150mm and 225mm ID sewers to 300mm ID sewers for approximately 1.5km will be required. It is proposed to separate the wastewater

and surface water drainage networks, which will serve the proposed development, and provide independent connections to the public wastewater infrastructure..

Potable Water

All proposed potable water design has been carried out in accordance with *Irish Water Code of Practice for Water Infrastructure, IW-CDS-5020-03*.

A new 200mm- diameter HDPE watermain connection is to be provided from the existing 200mm watermain on the Blackglen Road, along the northern site boundary.

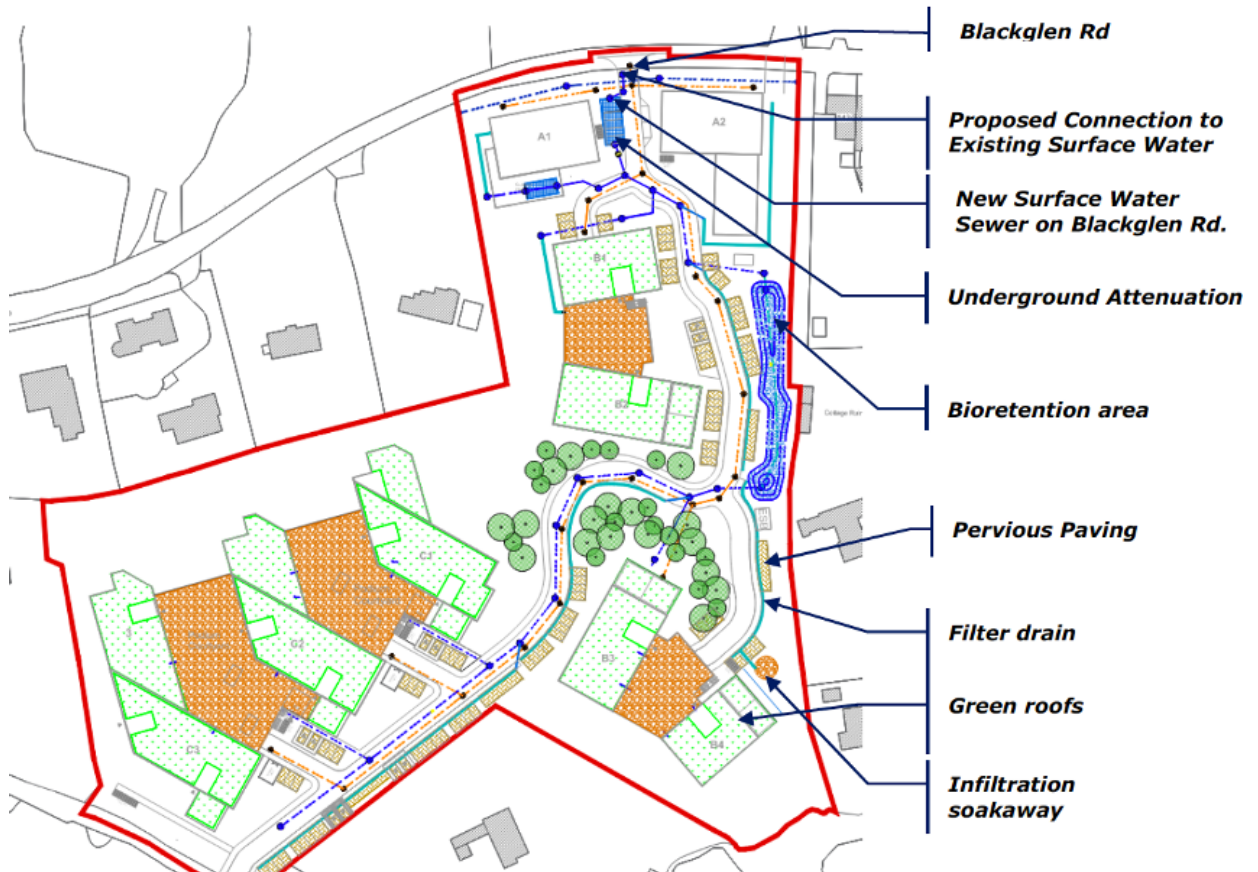


Figure 19 - Proposed Surface water Drainage Strategy

8.20 Architectural Heritage Impact Assessment

We refer the Board to the enclosed Assessment prepared by Rob Goodbody, Historic Building Consultants which considers the potential for the proposed development to have an impact on a ruined building that is outside the application site, but adjacent to the boundary, and which is believed to have been occupied by Constance Markiewicz in the time leading up to the Easter Rising of 1916.

The structure is the ruin of two semi-detached cottages, the northern of which is the smaller of the two and is the portion with the Constance Markiewicz connection.



Figure 20 -Cottage Ruin viewed from application site

Constance Markiewicz relinquished her tenancy of the cottage in 1919. It was occupied by others over the next twenty years or so until the 1940s, following which the fabric began to deteriorate. During the 1970s it was deemed to be unsafe and was partly demolished. The other cottage to which it was joined remained occupied for a longer period, but eventually it also deteriorated, and it was unroofed by the early 1980s. The two houses have been in ruin ever since.

The layout of the proposed development will not involve construction in the immediate vicinity of the ruin. The roadway through the site will be at a distance of 15 metres, and the nearest apartment building is to be some 30 metres from the ruin.

We refer the Board to the enclosed Assessment from Rob Goodbody, which notes that at this point the buildings are ruinous and the proposed development adjacent would have no appreciable impact on any remaining historical qualities.

9 STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT

9.1 Introduction

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

- Project Ireland 2040: National Development Plan (2021-2030)
- Project Ireland 2040: National Planning Framework (2018)
- Housing For All – A New Housing Plan for Ireland (2021)
- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031
- Sustainable Residential Development in Urban Areas (2009)
- Urban Design Manual - Best Practice Guidelines
- Delivering Homes, Sustaining Communities (2008)
- Best Practice Guidelines - Quality Housing for Sustainable Communities
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2020)
- Urban Development and Building Height Guidelines (2018)
- Design Manual for Urban Roads and Streets (DMURS) (2013)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, dated August 2018, issued pursuant to s.28 of the 2000 Act
- Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016.
- Climate Change and Low Carbon Development Act 2015 (included for completeness)

9.2 Project Ireland 2040 – National Planning Framework



National Development Plan 2021-2030

The National Development Plan 2021-2030 was published in 2021 as an update to the previous National Development Plan (NDP) 2018. As part of project 2040, the NDP sets out the Government's over-arching investment strategy and budget for the period 2021-2030. It sets out funding to underpin key Governments priorities. Specifically, allocations will support the realisation of critical goals laid out in the Housing for All Plan and will enable a step change in investment to amend the effects of climate change. The NDP underpins the overarching message of the National Planning Framework.

Project Ireland 2040

National Planning Framework



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that it intends to achieve this vision by:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The strategy for the capital is as follows:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations.

As set out in Section 6.6 of the NPF, a core principle of the NPF is to:

'Allow for choice in housing location, type, tenure and accommodation in responding to need', in addition to tailoring 'the scale and nature of future housing provision to the size and type of settlement where it is planned to be located'.

Therefore, we submit that the provision of high-quality development comprising 360 No. residential units (mix of 1, 2 and 3 No. bedroom apartments) at the subject site will contribute to achieving this core principle of the NPF.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable

development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth.

The ‘**National Planning Framework 2040**’ sets out the following key objectives:

- **National Policy Objective 1** - Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e., a population of around 2.85 million;
- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a** - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **National Policy Objective 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.
- **National Policy Objective 5** - Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 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.
- **National Policy Objective 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.
- **National Policy Objective 26** – Outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with Planning Policy.
- **National Policy Objective 27** – Aims to 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 the existing and proposed developments and integrating physical activity facilities for all ages.
- **National Policy Objective 31** - Prioritise the alignment of targeted and planned population and employment growth with investment in 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.
- **National Policy Objective 32** - To target the delivery of 550,000 additional households to 2040.
- **National Policy Objective 33** - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- **National Policy Objective 35** - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Having considered the above, it is our view that the current proposal complies with the above national policy on the following basis:

- The current proposal for 360 residential units in a development of up to 6 storeys in height is a well-designed, high-quality scheme and one that has carefully considered existing levels of residential amenities at adjoining residential development. The layout of the development

has been thoroughly considered and greater heights are positioned away from nearby residential dwellings.

- It is considered that the proposed scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the NPF.
- The development will rejuvenate the site and is a direct response to current trends in tenure and household formation in Ireland providing much needed housing for Dublin. This will encourage more people to live in the existing urban footprint while also contributing towards generating more jobs and activity within the urban area and will also contribute towards the target of delivering 550,000 no. additional households by 2040.
- The proposed development actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership and the provision of car share spaces and bicycle parking. The development also includes high quality and attractive open spaces for all age groups, which will encourage the active engagement.
- We note in particular that the residential amenity of the proposed development was considered in detail at a very early stage in the design evolution of the overall masterplan for the site. This application includes supporting documentation from O' Mahony Pike Architects which demonstrates specifically how the proposed development maintains existing and proposed levels of residential amenity in terms of urban design and access to daylight and sunlight specifically.
- The subject site is clearly defined as being infill and within the established urban footprint of the Metropolitan Area. The site is consistent with the definition of underutilised land zoned for development and proximate to established social infrastructure. The proposed development represents a dynamic and appropriately considered design response which will provide a landmark at Blackglen Road, and establish precedent for further sustainable, high quality density development in the general area.
- It is our professional planning opinion that the proposed development site has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the surrounding area.
- The proposed development actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership and the provision of car share spaces and bicycle parking. The development also includes high quality and attractive open spaces for all age groups, which will encourage the active engagement.
- At present, two Dublin Bus routes are located within 120 meters of the site entrance. The site is served by the 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station. The Glencairn Luas stop (with park and ride) on the green line is 1.9km from the proposed site, a 27-minute walk or 9-minute cycle from the site entrance. The site's location on a quality bus corridor and within a short walking and cycling distance of a LUAS encourages increased densities that will contribute to the consolidation of Dublin City.

The current national planning policy ultimately seeks the expedient delivery of critically required quality residential development at strategically located sites proximate to public transport nodes and corridors. This proposal contributes positively to the current national shortfall in housing supply. Furthermore, it is noted in Section 6.6 that 'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'

9.4 Housing For All – A New Housing Plan for Ireland 2021



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

- Preventing homelessness.
- Protecting tenants.
- Supporting social inclusion.

The plan focuses on:

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

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

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

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

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

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

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

We submit to the Board that the proposed development is consistent with the targets set out in this document. The proposed development provides for 360 no. new apartment units. This will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, local retail, recreational and associated social infrastructure.

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



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

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.

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

Section 4.4 of the RSES identifies that in order to achieve compact growth of 50%, housing needs to be provided within or contiguous to the built-up area of Dublin City and suburbs. To achieve this the Metropolitan Area Strategic Plan identifies strategic residential and employment corridors along key public transport corridors, both existing and proposed.

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

Section 5.3 of the RSES sets out the key guiding principles for the growth of the Dublin Metropolitan Area. Of relevance to the current proposals, this section of the RSES states:

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

The proposed development is consistent with this key guiding principle as it will achieve increased housing provision within the existing built up area of Dublin on an infill site. The proposed development will accelerate housing supply at an appropriate location which is well served by public service and public transport.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area as set out below:



Figure 21 - Dublin City and Suburbs

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

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

MASP Housing and Regeneration

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

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin Suburbs, and the development of key Metropolitan Town, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall settlement strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental communities”

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out

that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities.

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

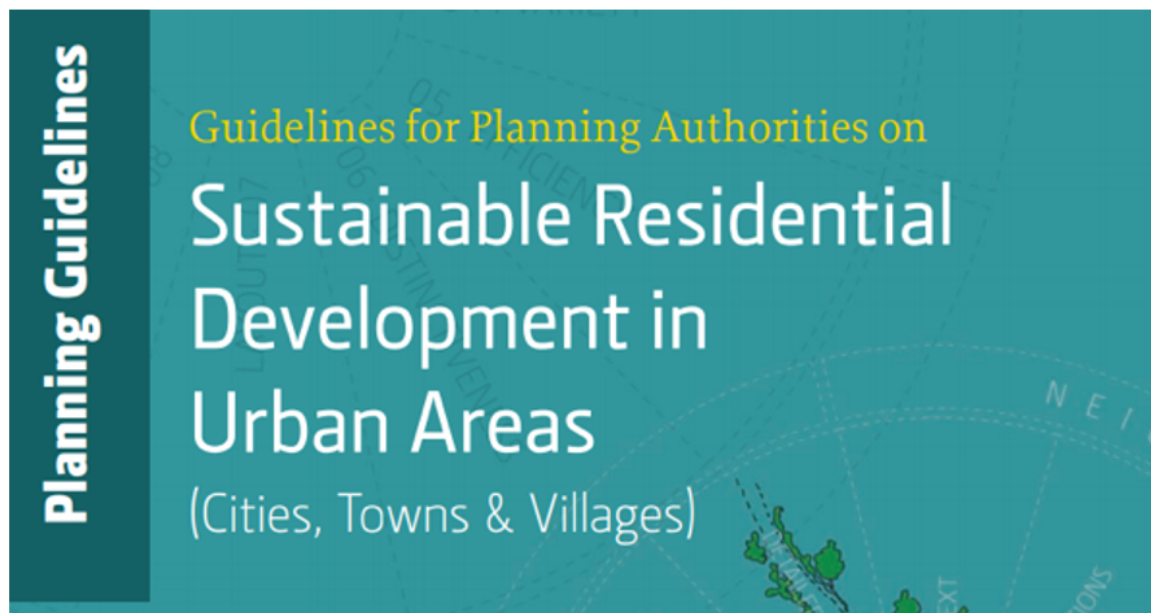
Consolidation and Re-Intensification

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

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

- The development proposal delivers an appropriate level of residential density at 97.3 units per ha and has regard specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for planning Authorities (2018)’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities (2018)’ in ascertaining an appropriate residential density, height, and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density in an area well served by public transport.
- The proposal utilises a prime suburban site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built-up area of Dublin.
- The subject lands are located within the metropolitan area of Dublin in Sandyford which is identified by the RSES as an area for continued high density development as a business district. It is envisaged that the proposed development, which is within walking distance to Sandyford Business Park, will complement this emerging business district through providing modern residential development within walking and cycling distance.

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



The role of these guidelines is to ensure the sustainable delivery of new development throughout the country. The Guidelines provide direction on the core principles of urban design when creating places of high quality and distinct identity. High quality design is recommended in the development management process. The Guidelines are accompanied by an Urban Design Manual, which demonstrates how key principles can be applied in the design and layout of new residential development.

Chapter 5 of this document focuses on Cities and Larger Towns. It is our view that Sandyford (within Dun Laoghaire) falls under the category larger towns in the Guidelines given that population here is over 5,000 (7,688) which appropriately defines larger towns.

We examine the contents of the Guidelines below as they relate to Larger Towns.

Design

The key elements of design in the context of larger towns are as follows:

- Acceptable Building Heights
- Avoidance of Overlooking/Overshadowing
- Provision of adequate public and private open space
- Internal Space in Apartments
- Suitable parking provision
- Provision of ancillary facilities including childcare

The proposed development has been designed in the context of the above and we note the following in this regard:

- Appropriate building heights are proposed in accordance with the performance criteria under the Building Heights Guidelines 2018. Section 9.12 of this report refers and contains the specifics of heights proposed.
- The potential for overlooking has been reduced through the considered positioning of residential blocks, appropriate separation distances, appropriate setback distances and the strategic positioning and design of windows and balconies. We refer An Bord Pleanála to the Design Statement prepared by O'Mahony Pike Architects and detailed drawings submitted herewith for further details.

- Overshadowing is not considered an issue in this case, and we note the submission of a Daylight and Sunlight Assessments herewith prepared by OCSC for further details.
- An adequate level parking is delivered with primary parking delivered at basement level. All parking is proximate to units and is considered safe and secure.
- Pedestrian access and permeability are key across the site and specific attention has been given to accessibility and the connectivity of the site with surrounding streets
- A creche (401sq.m) and residential amenity (607sq.m) facilities are delivered within the scheme.

Density

A density of 97.3 units per ha is proposed at this site. It is submitted that this is an appropriate approach to development at this location given the surrounding site context. Chapter 5 of the Guidelines generally sets out that that planning authorities should promote increased residential densities in appropriate locations and the objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

The Guidelines state:

“Walking distances from public transport nodes (e.g. stations / halts / bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak hours) should also be taken into consideration in considering appropriate densities. In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes. Minimum densities should be specified in local area plans, and maximum (rather than minimum) parking standards should reflect proximity to public transport facilities.”

The proposed development is located on suitably zoned land for residential purposes. The density requirement set out by the current County Development Plan and national guidance have been complied with when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights, and connectivity. Careful consideration has been given to adjoining levels of residential amenity.

The proposed development is located within c. 1.8km of the Glencairn Luas Stop, connecting the scheme with Dublin City Centre, as well as the rest of Metropolitan Dublin and the suburbs. There are also bus connections available in the area, including directly adjacent the development on Blackglen Road. The services are as follows:

- The No.44B route which serves Dundrum to Glencullen to the south near the county bounds. This route utilises the stops along Blackglen Road.
- The No.114 from Simon’s Ridge to Blackrock is also available from Lamb’s Cross. This route enables easy interchange to the DART and Coastal Dublin Towns and Villages and their associated amenities.

We submit that this density is appropriate and in compliance with these Guidelines, noting the proximity to easily accessible transport connections and taking note of the new Apartments Guidelines (2020) and new National and Regional Guidelines which provide for increased densities within existing built up areas of Metropolitan Dublin.

Appropriate Locations for Increased Densities

The proposed development aims to deliver an appropriate density and form of residential development on this primely located site along the Blackglen. At present, two Dublin Bus routes are located within 120 meters of the site entrance. The site is served by the 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station. The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance.

The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.

The site's location on a quality bus corridor and within a short walking and cycling distance of a LUAS encourages increased densities that will contribute to the consolidation of Dublin City. Section 5.4 to 5.10 of the guidelines sets out appropriate locations for increased densities. They state that:

“where there is good planning, good management, and the necessary social infrastructure, higher density housing has proven capable of supporting sustainable and inclusive communities. In general, increased densities should be encouraged on residentially zoned lands and particularly in the following locations:

- a) City and town locations*
- b) Brownfield sites (within city or town centres)*
- c) Public transport corridors*
- d) **Inner suburban / infill***

The overall proposed development of 360 units provides for a residential density of 97.3 units per ha based on the substantive development area of 3.7ha. For the purpose of these guidelines, the propsoed development site can be categorised as falling withing the definition of **‘Inner Suburban / Infill’** site.

‘Inner suburban/infill sites’ are referred to as inner suburban towns or cities, proximate to existing or due to be improved public transport corridors. In addition, infill residential developments are referred to as:

‘potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority’s views with regard to the range of densities acceptable within the area. The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc. Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands’.

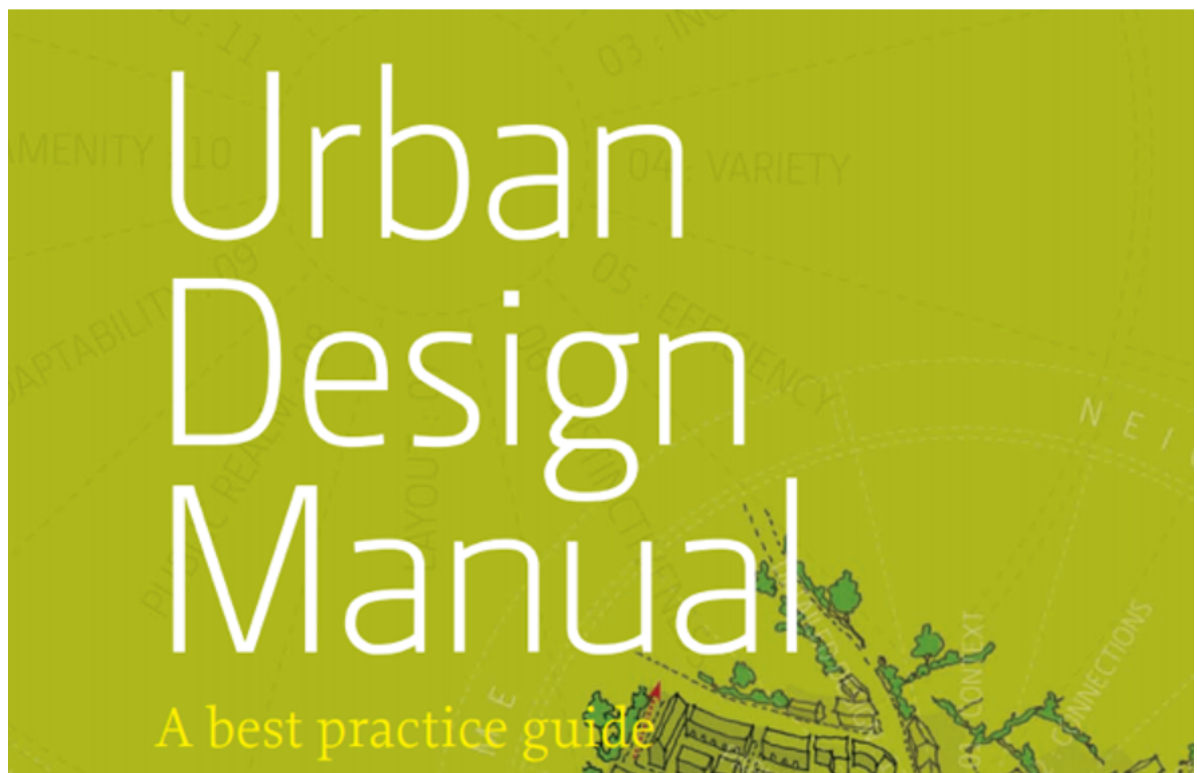
In response to the above, we note the following:

- As advised above, the proposed development represents the re-intensification of an underutilised infill, brownfield land with much needed higher density residential units in this sustainable location proximate to public transport, services and employment, which will contribute positively towards addressing the national housing crisis.
- The area is currently transitioning in character from lower density housing to higher density apartments and thus the density of the proposed development can be appropriately assimilated into the surrounding environment.
- It is considered that the schemes design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically

positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the NPF.

- The development represents sustainable infill development of underutilised lands and has been designed to assimilate the surrounding residences, both lower density dwellings and permitted higher density apartment developments.
- The proposed development is located on infill, brownfield land in Dublin, served by public transport and is within a short distance of key employment locations including Sandyford Business Park, a significant employment district area containing over 500 No. companies and Dundrum Town Centre.
- It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification for this key underutilised infill/brownfield site, contributing positively to the regeneration of the surrounding area.
- It is considered that the proposed development is located on suitably underdeveloped infill/brownfield zoned land for residential purposes. The density requirement set out by the current County Development Plan and national guidance has been taken into consideration when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights, connectivity, and the limited use of cul-de-sacs. Careful consideration has been given to adjoining levels of residential amenity and compliance with all Development Plan standards having been achieved.

9.6.1 Urban Design Manual



Aside from the above, the proposed development complies with the Guideline's 'sister' document, the 'Urban Design Manual'. This application for permission is accompanied by a Design Statement, prepared by O' Mahony Pike Architects, which demonstrates the manner in which the proposed development has regard to and has been developed in accordance with best practice in respect to urban design.

The Design Statement should be read in conjunction with this combined Planning Report and Statement of Consistency and the plans and particulars accompanying this planning application. For the purposes of this Statement of Consistency, compliance with the key requirements of the Urban Design Manual are noted below:

CRITERIA	PROPOSAL RESPONSE
<p>CONTEXT</p> <p>How does the development respond to its surroundings?</p>	<p>The subject site is located in a peripheral but transitional area within metropolitan Dublin. An understanding of the existing site and its constraints has steered the design of this proposal. The new design will create a high-quality residential development which will respect the existing surrounding area. The proposal also protects the existing residential amenity of adjoining and adjacent residential development through locating height and massing away from these boundaries. The proposed development specifically responds to the size of the site to allow for a gradual height increase from the site boundaries towards the center of the site.</p> <p>The site occupies a strategic position in urban design terms with the potential to create a focal point along Blackglen Road. While the general area can be described as low density/edge of urban brownfield almost rural in nature. The proposal has been designed specifically to enhance connections to the surrounding area including the surrounding landscape which is comprised of residential estates, agricultural land, and areas of woodland.</p> <p>Open spaces areas are designed to maximise on passive surveillance and take advantage of the proximity of the surrounding area. An integrated development is delivered and one which enhances the presence of the natural landscape with high quality materials. The predominant horizontal building forms are interrupted by a singular slender vertical element located at a neutral promontory at a point of transition between the lower hillside and upper hillside character areas. The material palette of natural textures and tones are proposed to complement and respond to its surroundings, and natural landscape setting.</p>
<p>CONNECTIONS</p> <p>How well is the new neighbourhood/site connected?</p>	<p>The subject site is located 400m from a busy Neighborhood Centre at Lambs Cross. This site is also well served by existing community infrastructure and amenity space. The site is proximate to key locations in the county, providing employment and services.</p> <p>The proposal delivers on the following in terms of connections:</p> <ul style="list-style-type: none"> • The site is located within easy walking distance of the Sandyford Village and the amenities and services offered there. • The Glencairn Luas stop on the Green Line is 1.9km from the proposed site, a 27-minute walk or a 9-minute cycle from the site entrance. A park and ride facility are also available at Glencairn Luas Stop. • Cycle tracks/lanes on Blackglen Road and Lamb's Cross junction are to be improved by the development of the Blackglen Road / Harold's Grange Road Improvement Scheme. • A cycle lane/track runs the whole way into Dublin City Centre almost unbroken via R117 & R825. This network also passes through Dundrum Town and Ranelagh. • 2 no. Dublin Bus routes are located within 120 meters of the site entrance. Connectivity with the Dublin Bus network will improve as part of the Bus Connects proposals. • The site can be easily accessed from both sustainable modes of transport including public transport, walking, and cycling and can also be easily accessed via the public road network. • The proposed development benefits from existing route and public transport. The proximity to the transport connections to Dublin city Centre allows for use of public transport rather than private vehicle. • Transport infrastructure in the area is being upgraded by way of Blackglen Road Improvement Scheme, (completion spring 2023) which is now underway at the site. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site.

<p>INCLUSIVITY</p> <p>How easily can people use and access the development?</p>	<p>We note the following in terms of usability and access to and within the scheme:</p> <ul style="list-style-type: none"> • The proposed development consists of a variety of sizes of apartments to cater for a wide range of households and individuals. All apartments are generous in size and in excess of current residential design guidelines. • The proposed development is focused on providing homes in the immediate future to match the aspirations set out in 'Rebuilding Ireland' to increase provision. • The design and layout provide ease of access by lift or stairs to clearly defined public open spaces which will be privately maintained and provide an enclosed secure space for children and elders. • The majority of dwellings overlook the scheme's open space. • There is a mix of defined and natural open spaces. • The scheme provides an inviting aspect to the site and avoids physical and visual barriers with attractive boundary treatments and passive surveillance. • There are also cycle and pedestrian routes connecting the site to the wider area. <p>The creation of a central open space of 17,025 sq.m has been provided. The landscape architects Gannon + Associates have designed a scheme that is informed by the wider landscape character of the receiving environment.</p> <p>The introduction and improvement of pedestrian and cyclist access to and through the site through the proposal will further enhance this network.</p> <p>A recreational Amenity building for residents of 607 sq.m is proposed in Block A. This building is conveniently located at the Blackglen Road entrance and is designed to provide a range of services to future residents.</p>
<p>VARIETY</p> <p>How does the development promote a good mix of activities?</p>	<p>The proposed development promotes social integration and provides for a diverse range of apartment types. 1 Bed, 2 Bed and 3 Bed apartment types are provided that differ in size and layout offering a variety of solutions to people of all ages and family size.</p> <p>The apartments are consistent with the best practice and the requirements of "The Sustainable Urban Housing: Design Standard for New Apartments Guidelines for Planning Authorities". Please refer to the Housing Quality Assessment, prepared by O'Mahony Pike Architects, and is enclosed with this application, for an accurate breakdown of size and apartment types.</p> <p>The built environment of the proposed development will respond directly to their setting and the natural landscape environment created by the site's location and unique characteristics. The emphasis is to sit the buildings sensitively onto the natural contours and by providing deep setback terraces at the lower levels allowing for an appropriate stepping in scale thereby reducing the visual bulk and massing.</p> <p>The landscape design of the proposed development is inspired and informed by the wider landscape character of the receiving environment. Located at the foothills of the Dublin Mountains, the area is characterised by an undulating landscape with a mix of settlement patterns, woodland, gorse and agricultural land.</p> <p>This variation of landscape typologies is reflected in the landscape design of the proposed site and acts to embed the development into the landscape through a conscientious design and a planting palate that is reflective of the proximate tree and shrub species of the area and contributory to the wider biodiversity.</p>
<p>EFFICIENCY</p> <p>How does the development make appropriate use of resources including land?</p>	<p>The site is defined as inner suburban/infill in the context of the Sustainable Residential Development in Urban Areas Guidelines. High density is justified on this instance given the sites proximity to public transport and sustainable access (walking and cycling) to areas of employment. The proposed development seeks by way of higher density development to increase the greater efficiency of land use. The intensification of residential occupants in this location prevents the further outward spread of development and contributes to the efficient use of existing services and facilities.</p> <p>The increase in the local population in an area of current low density residential units will significantly increase the population of the immediate area. This increase in population will</p>

	<p>significantly contribute to the viability of the surrounding small businesses, shops, restaurants and sporting facilities, hence contributing to their efficiency.</p> <p>The residential proposal in this case is delivered in line with the Dun Laoghaire Rathdown Development Plan 2022-2028. The main open space provides a large, landscaped area accessible to all. The majority of car parking is at basement level with an element of on street parking to encourage activity and passive surveillance.</p> <p>The proposed development represents the efficient use of land.</p>
<p>DISTINCTIVENESS</p> <p>How do the proposals create a sense of place?</p>	<p>The aim of the development is to create a unique environment and sense of place combined with high quality architecture which responds directly to the unique characteristics of the site.</p> <p>The scheme promotes the principles of DMURS - Design Manual for Urban Roads and Streets and we refer An Bord Pleanála to the DMURS statement enclosed from OCSC Engineers. This balance of road planning, public space and site layout will provide an inviting and enticing setting for a new community. The proposal will provide a positive addition to the locality retaining existing natural features to maintain the identity of the site utilising the existing landform and ecological features.</p> <p>The public open space aims to create a unique sense of place, community, and togetherness by being a unifying resource that links all areas of the proposed development.</p> <p>The layout makes the most of the existing landscape, topography, and flora to create a sensitive and memorable scheme. It will have a distinct appearance along Blackglen Road, and the proposed open space areas will merge into the existing landscape of the site exploiting views into and out of the scheme. The materials used reflect the existing developments in the neighbouring environment.</p>
<p>LAYOUT</p> <p>How does the proposal create people-friendly streets and spaces?</p>	<p>The proposed site layout facilitates good permeability and connectivity by way of a pedestrian and cycle route which connects Blackglen road adjacent to Fitzsimons wood to Woodside road to the south.</p> <p>The design team have liaised with Dun Laoghaire Rathdown regarding the Part 8 works, and the proposed layout of the development is sympathetic to and will tie in with the upgraded Blackglen Road.</p> <p>The internal road layout has been designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) as a low speed environment. Despite the steep nature of the site, roadways have been kept under 5% gradient in order to facilitate all modes of transport.</p> <p>The layout provides an interconnected and pedestrian permeable development. The routes are legible and animated with active frontages and front doors directly serving the street.</p> <p>The street hierarchy favors the pedestrians and cyclists over drivers. Traffic speeds are controlled by design and layout. The nature of the proposed internal road network is the principal element that enhances the setting for this development, as it allows for the promotion of the public realm over that of vehicular access.</p> <p>The orientation and layout of the residential units ensures that all roads and public spaces benefit from passive surveillance. All ground floor apartments are planned as 'own door' entry units directly from the roadside ensuring good active frontage and passive surveillance.</p>
<p>PUBLIC REALM</p> <p>How safe, secure and enjoyable are the public areas?</p>	<p>Public Open space has been carefully positioned and designed to a high level of quality design and implementation to enhance the public realm, the density and number of apartments proposed demands that space forming the make-up of the public realm be designed and constructed to a very high quality. We submit that this has been achieved by the landscaping design submitted by our landscape architect.</p> <p>Proposed areas of open space will be overlooked by proposed residential units to ensure passive surveillance which will provide a level of comfort and safety to pedestrians using the open space areas of the site. This includes the children's' play areas.</p> <p>Insofar as possible, cars and bicycles have been accommodated out of sight in internal storage rooms or in enclosed parking facilities. Where this has not been possible the impact of these elements on the public realm have been minimised by careful planting and screening.</p>

	The ground floors of the buildings at the entrance are occupied by a childcare facility and resident amenity providing an active frontage onto the street and the arrival court.
ADAPTABILITY How will the buildings cope with change?	<p>The apartments are designed as 1 bed, 2 bed and 3 bed units. They are generous in size and profiled in space suitable for families living in two- and three-bedroom units. The variety of design and choice provides the opportunity to either scale up or down in circumstances demand.</p> <p>The quality of the units is considered appropriate to enable adaption over time depending on residential needs. There are own door units and social units proposed within the scheme, which is considered a welcome approach to urban living.</p>
PRIVACY AND AMENITY How do the buildings provide a high quality amenity?	<p>A strong variety of amenity space is provided in addition to proposals to increase connectivity to existing surrounding amenity space. Each apartment has access to private open space in the form of a terrace generally in excess of the area demanded by the design guidelines. Appropriate setbacks and window/balcony design will be provided between the proposed buildings to avoid overlooking and provide privacy.</p> <p>While ground floor apartments have patios opening directly onto open space, all apartments have access to the public open space and to the community building which is its further amenity.</p> <p>Apartment blocks are located at sufficient distances from each other to ensure the privacy of each apartment. Partitioning of windows in apartments are located so as to avoid any infringement of privacy.</p>
PARKING How will the parking be secure and attractive?	<p>A total of 419 spaces are proposed (317 no. at podium/basement level and 102 no. at surface level)</p> <p>Bicycle storage will be provided for all apartments to meet the requirements of the Dun Laoghaire Rathdown Development Plan 2022-2028. A total of 970 spaces have been provided (740 no. long term and 230 no. short term) throughout the development for the use by residents and visitors.</p> <p>A Mobility Management Plan has been prepared by OCSC which accompanies this application, the aim of which is to reduce the use of car and to encourage more sustainable transport patterns.</p> <p>The development will provide a Cargo Bike service, as well as an on-site bicycle workshop. The Cargo Bike service will be highlighted to residents with associated information on how to register, how the system operates and cost of use.</p> <p>As noted in the Traffic Impact Assessment prepared by OCSC, local Census data has shown that regular car based travel is lower than normal in this area meaning the need for car parking is naturally reduced. However, it is acknowledged that there may potentially still be demand for such occasional trips by car. On that basis, one of the key proposals within the Mobility Management Plan for the site is the potential for provision of car club vehicles</p> <p>Electric Parking – 80 no. car parking spaces will be equipped with electric charging points as part of the proposal.</p>
DETAILED DESIGN How well thought through is the building and landscape design?	<p>The design of the proposed development is the culmination of expertise with the interdisciplinary design team. The design has evolved by way of the Section 247 consultation meeting with the council and An Bord Pleanála. A full Architectural Design Statement accompanies this application.</p> <p>Comprehensive landscaping proposals by Gannon + Associates Landscaping Architects illustrates a high-quality landscape approach using a variety of materials, textured finishes and planting, along with a range of facilities for children of different ages, parents and elderly, to provide a public realm that is aesthetically pleasing, functional and practical.</p>

Table 6 - Compliance with Urban Design Manual

The above table clearly outlines how the development proposal is envisaged to deliver on the key provisions of the Urban Design Manual. In the circumstances, it is clear that the proposed development is consistent with the objectives of the Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual.

9.7 Delivering Homes Sustaining Communities (2007)



The Department's policy on housing provides the overarching policy framework for an integrated approach to housing and planning and notes that demographic factors will continue to underpin strong demand for housing. This in turn presents challenges for the physical planning of new housing and associated services. The quality of the housing environment is central to creating a sustainable community.

The *Delivering Homes Sustaining Communities* policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities' and these are the focal point in terms of the consistency of the current proposal.

9.7.1 Quality Homes for Sustainable Communities (2007)



The purpose of these Guidelines is to promote high standards in design and construction and in the provision of residential development and services in new housing schemes.

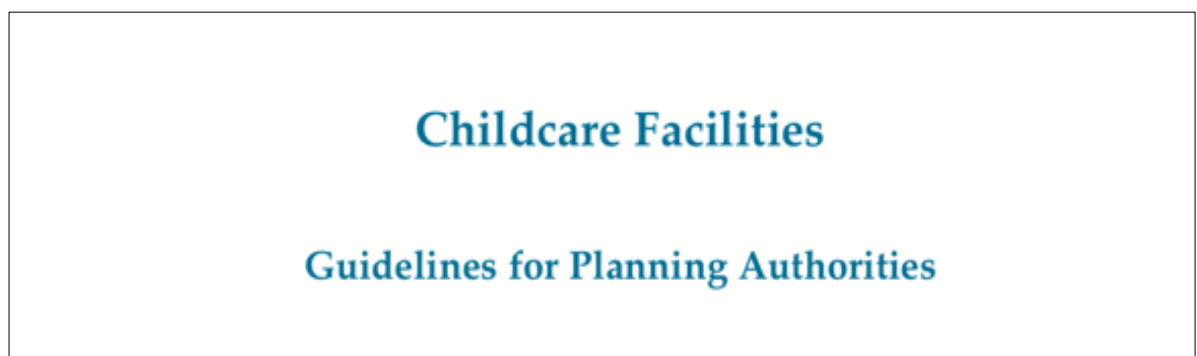
The proposed Blackglen SHD delivers on the key principles of these Guidelines as follows:

- The proposal provides for the efficient use of an opportunistically located site in close proximity to local amenities and public transport. At present, two Dublin Bus routes are located within 120 meters of the site entrance. The site is served by the 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station. The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance. The site's location on a quality bus corridor and within a short walking and cycling distance of a LUAS encourages increased densities that will contribute to the consolidation of Dublin City.
- The proposed development will provide a quality living environment for residents with apartments designed to meet or exceed both qualitative and quantitative standards and the delivery of residential amenities and open space provided.
- Diversity in the unit type and mix proposed (1 2, and 3 bedroomed apartments).
- Pedestrian Access is prioritised within the scheme.
- All public open spaces are safe and benefit from passive surveillance. A clear and coherent network of spaces is proposed throughout the scheme.
- There are appropriate play areas delivered across the scheme with the theme of natural play spaces evident throughout the network of open spaces. Play Areas ensure security and benefit from passive surveillance.

A Housing Quality Assessment has been prepared by O' Mahony Pike Architects and submitted with this planning application. We direct the Bord to consideration of this assessment for full details on the extent of proposals.

We submit to the Bord that the current proposal is supportive of the objectives of the Delivering Homes Sustaining Communities (2007) and the associated Best Practice Guide 'Quality Housing for Sustainable Communities'.

9.8 Guidelines for Planning Authorities on Childcare Facilities (2001)



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

The Guidelines identify a number of appropriate locations for childcare facilities, which include the following:

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

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces. The guidelines state that 50% of units can be assumed to require childcare.

Based on the mix proposed, we note the following requirements for childcare:

- 50% of 2 and 3 bedroom units will require childcare provision. We have identified that there are 237 x 2 and 3 bedroom units (224 x 2 bedroom units and 13 x 3 bedroom units) proposed and so 50% equates to 118.5 units having the potential to require childcare.
- 1 facility is required for every 75 units requiring childcare.

Overall findings as follows:

Proposal	Estimated Demand	Available Capacity
360 residential units	53 spaces	137 spaces minimum

Table 7 - Estimated Demand vs. Available Capacity for Childcare Spaces

The proposed development comprises 360 no. units, with 123 of those units comprising of 1-bed. Accordingly, 237 no. units are to be provided to accommodate families and must be considered in the context of generated requirements for an additional childcare facility. The scheme includes a Childcare Facility appropriately sized to cater for likely demand arising from this development.

Having regard to the proximity and availability of existing childcare facilities to the proposed development, there is no need or requirement for the provision of additional childcare spaces as part of the proposed development. We ask the Board to consider the current proposal and the nature of the units proposed, as well as the available capacity of existing childcare facilities, and that same does not warrant a requirement for childcare spaces.

All considered, the above analysis, the demographic analysis for the area and the nature of the proposal support the position that a childcare facility is not required for this development.

9.9 The Planning System and Flood Risk Management (2009)



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

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

We direct An Bord Pleanála to the enclosed Flood Risk Assessment prepared by OCSC Engineers for full details on the assessment carried out in line with the above guidelines. The key conclusion of this document is as follows:

‘It has been demonstrated that the site is not at risk of flooding from external sources, or as result of the proposed development. In order to minimise the risk of flooding within the development, it is recommended that all drainage infrastructure is designed and installed in accordance with the relevant standards. The proposed units are located outside the 1 in 1000-year flood extents and above the 1 in 1000-year flood level’.

We submit to the Board that the proposal is consistent with the Planning System and Flood Risk management Guidelines 2009.

Appropriate Assessment of Plans and Projects in Ireland

Guidance for Planning Authorities

Under Article 6 (3) of the EU Habitat Directive “[any plan or project not directly connected with or necessary to the management of the site [Natura 2000 Site, i.e., SAC or SPA] but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. (i.e., SAC or SPA). This requirement is also detailed under Irish law in, *inter alia*, the Planning and Development Act 2000 (as amended) and associated Regulations.

An Appropriate Assessment Screening Report was prepared by Enviroguide and is submitted as part of this application. The report establishes that none of the habitats and species listed as ‘qualifying features’ in the Natura 2000 site designations in proximity to the subject lands will be affected by the proposed development and it has been assessed that the possibility may be excluded that the proposed development will have any significant effect on the single European site noted to be linked by a Source-Pathway-Receptor impact pathway. The proposed development, either alone or in combination with other plans or projects, would not be likely to have a significant effect on any European Site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required

We submit to the Board that the proposal is consistent with the Appropriate Assessment of Plans and Projects in Ireland guidance for Planning Authorities.

Sustainable Urban Housing: Design Standards for New Apartments

Guidelines for Planning Authorities issued under
Section 28 of the Planning and Development Act,
2000 (as amended)

December 2020



‘Sustainable Urban Housing: Design Standards for New Apartments 2020’ are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

The 2020 Apartment Guidelines replace the 2018 version and are updated to reflect the conclusions from the review of co-living and shared accommodation.

The Guidelines address particular issues in order to:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas.
- Make better provision for building refurbishment and small-scale urban infill schemes.
- Address the ‘build to rent’ sector.
- Prohibit ‘shared accommodation’ models since 2020.
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions

The current proposal provides for 360 no. residential units. This Planning Report and Statement of Consistency sets out the compliance of the proposed development with the key policy requirements and standards as follows:

9.11.1 Location

The ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, identify a number of locations suitable for apartment development primarily. These are defined as:

- Central and / or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and / or Less Accessible Urban Locations.

The first urban typology described in the Guidelines is that of Central and/or Accessible Urban Locations, and while the proposed development does fall into this category in terms of walking distance to public transports the second typology is more apposite to the site given the location of the proposed

development, over 10km from Dublin City centre, the services and facilities in the area, and the short walking distance to frequent Luas services and reasonably frequent bus services.

Intermediate urban locations are defined in the Apartment Guidelines by the following criteria:

- Sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1000m), of principal town or suburban center or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e., between 10-15 minutes or 1000- 1500m) of high-capacity urban public transport stops or within reasonable walking distance (i.e., between 5-10 minutes or up to 1000m) of high frequency urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e., up to 5 minutes or 400- 500m) of reasonably frequent urban bus services.

The proposed development is in keeping with this urban typology as described in the 'Guidelines' for the following reasons:

- The Blackglen site is within 1900m of the Luas line, although this is slightly further than the recommended 1500m, the site is a well-connected location with bus services and a walkable distance to the Luas.
- The site is located on a Quality Bus Corridor with a bus stop located on the roadside boundary. The 44B bus route runs from Glencullen to Dundrum Luas Station and the 114 bus route runs from Simon's Ridge to Blackrock Station. Both Dundrum Town & Blackrock Station have numerous bus routes to neighbouring districts as well as Dublin city Centre.
- A DART service is also available at Blackrock Station. Glencairn is the closest Luas stop to the development and is located within 5 minutes' cycle or 20 minutes' walk. A park and ride facility is also available at Glencairn Luas Stop.
- The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.

Having regard to the site's location within the catchment area of the Section 49 LUAS Development Contribution Scheme, the proximate Glencairn and Sandyford Luas stops, and existing bus stops, it is our professional planning opinion that the subject site can be considered an Intermediate Urban Location. The subject development has therefore been designed with increased building height and density in accordance with National level guidance.

Details in respect of compliance with the standards contained in the Sustainable Urban Housing: Design Standards for New Apartments, 2020, are set out in the accompanying Housing Quality Assessment and Schedule of Accommodation by O' Mahony Pike Architects (OMP). In particular, the guidelines contain a number of Specific Planning Policy Requirements (SPPRs) of relevance.

The current proposal provides for 360 no. residential units and this statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as follows:

9.11.2 Specific Planning Policy Requirements (SPPRs)

SPPRs considered relevant for consideration in this case are set out below followed by a compliance response for the current proposal.

Specific Planning Policy Requirement 1

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

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

Applicant Response to SPPR1

The residential development mix provides for 360 no. units as follows:

- 123 x 1 Bedroom Units (34.2%)
- 224 x 2 Bedroom Units (62.2%)
- 13 x 3 Bedroom Units (3.6%)

Evidently, the proposed development is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units.

The proposed unit mix is in line with the requirements of SPPR 1 as set out above.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

Minimum Apartment Floor Areas	
1-bedroom apartment (2 persons)	45 sq.m
2-bedroom apartment (3 persons)	63 sq.m
2-bedroom apartment (4 persons)	73 sq.m
3-bedroom apartment (5 persons)	90 sq.m

Table 8 - Minimum Apartment Floor Areas

Applicant Response to SPPR3

The proposed development complies with the minimum apartment floor areas as follows:

Minimum Apartment Floor Areas		
	Required	Proposed
1-bedroom apartment (2 persons)	45 sq.m	48.4sq.m - 51.4sq.m.
2-bedroom apartment (3 persons)	63 sq.m	67sq.m. – 77.3sq.m.
2-bedroom apartment (4 persons)	73 sq.m	74.8sq.m. -103.7sq.m.
3-bedroom apartment (5 persons)	90 sq.m	95.3sq.m – 107.5sq.m

Table 9 - Proposed Apartment Floor Area

This Strategic Housing Development application also includes a Housing Quality Assessment and a detailed daylight, sunlight, and internal light analysis report, in accordance with Chapter 6 of the Guidelines.

The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings and detailed

'Design Statement' and 'Housing Quality Assessment' schedule prepared by OMP Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement 4

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

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

Applicant Response to SPPR4

The development in this instance is located in a suburban location on appropriately zoned lands in a highly accessible location within the development boundary of Sandyford. The proposed development delivers 50% dual aspect units. We note specifically that a total of 181 of the 360 no. units proposed deliver dual aspect.

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

Specific Planning Policy Requirements 5

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

Applicant Response to SPPR5

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 2.7m – 3.2m. We note the Guidelines state the following:

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

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

Specific Planning Policy Requirements 6

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

Applicant Response to SPPR6

The number of apartment units per core will vary per block. The number of apartments per floor per core will not exceed 12 no. in any block. We refer An Bord Pleanála to the enclosed floor plans for detail on this.

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

9.11.3 Internal Storage

The Board will note that full compliance with the Guidelines is achieved in respect of storage to individual units as per Appendix 1 of the guidelines.

No. Of Bedrooms.	Minimum Storage Requirements	Proposed.
1	3 sqm	3sq.m - 3.6sq.m.
2 (3p)	5 sqm	5.1sq.m. – 6.3sq.m.
2 (4p)	6 sqm	6.0sq.m. - 9.2sq.m.
3	9 sqm	9.4sq.m. – 10.9sq.m.

Table 10- Storage Requirements

Please refer to the Housing Quality Assessment prepared by O’ Mahony Pike Architects for further details on storage compliance.

9.11.4 Private Amenity Space

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

No. Of Bedrooms.	Minimum Private Open Space Standards	Proposed.
1	5 sqm	5sq.m – 62sq.m.
2 (3p)	6 sqm	7sq.m. – 8sq.m.
2 (4p)	7 sqm	7sq.m. – 71sq.m.
3	9 sqm	10sq.m. – 85sq.m.

Table 11 - Private Amenity Space

All balconies will exceed the minimum depth requirement of 1.5 m with a provision of 1.8m for each balcony.

9.11.5 Part V

The applicant has entered into discussions with the Housing Department of Dun Laoghaire Rathdown County Council [DLRCC] on Part V proposals and correspondence with the Housing Department is enclosed with this application. We refer specifically to O’Mahony Pike Design Statement enclosed herewith which includes the following:

- Part V Schedule of Accommodation
- Site Layout Plan
- Floor Plans and Elevations
- Part V Obligation Letter
- Part V Costings
- Part V Validation Letter from the Housing Department

We note the following proposal in summary:

- Total Units Proposed (360)
- Part V Proposal (36 units) - as agreed in principle with Housing.

9.11.6 Refuse Storage

The Apartment Guidelines require that the storage and collection of waste materials be provided in apartment schemes. The Guidelines also state that *“Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems.”*

The refuse storage proposed as part of this application complies with the requirements under the 2020 Apartment Guidelines. Refuse storage will be provided for each block located at basement levels easily accessible by lift from all apartments. These storage areas will be secure and easily accessible to residents and other required users.

The Operational Waste Management Plan prepared by Enviroguide provides further detail on how waste will be managed during the operation of the scheme

9.11.7 Bicycle Parking and Storage

The Apartment Guidelines require that *“planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”*

Section 4.16 of the apartment design guidelines states the following:

“Cycling provides a flexible, efficient, and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes. In particular, planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”

The Apartment Guidelines state a requirement of 1 cycle parking space per bedroom and 0.5 space per unit, this equates to a requirement of 540 cycle parking spaces.

The Local Development Plan requires 1 cycle parking space per unit and 1 cycle parking spaces per 5 units for visitors. This equates to a total of 432 cycle parking spaces.

The current allocation of cycle parking is for 970 cycle parking spaces, (740 no. long term and 230 no. short term) . The current quantum of cycle parking finds a middle-ground between the two documents which should satisfy the requirements.

This level of cycle parking provision is appropriate and justified in the context of the site location, public transport accessibility, the quantum of car parking proposed, and is supported by the Guidelines which states that *“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.

The standard for cycle parking as set out in the Dun Laoghaire Rathdown ‘Standards for Cycle Parking and associated Cycling Facilities for New Development 2018’ document states that for residential developments 1 short stay (visitor) parking spaces per 5 units and 1 long stay parking space per 1 unit is required. As per Table 6 below the proposed development fully complies with the bicycle parking standards as per the Dun Laoghaire Rathdown Development Plan 2022-2028

Type	DLRCC Requirements	Apartment guidelines	Provided Parking	Parking Ratio
Long Stay	1 Long Stay parking space per 1 unit	Min, of 1 parking space per bedroom	970	1 : 2.69
Short Stay (Visitor)	1 Short Stay (visitor) parking spaces per 5 units	1 space per 2 residential units		

Table 12 - Bicycle Parking DLR Standards

The proposed development is therefore consistent with the DLRCC standards for bicycle parking.

9.11.8 Cargo Bicycles & Workshop

The development will provide a Cargo Bike service, as well as an on-site bicycle workshop. The Cargo Bike service will be highlighted to residents with associated information on how to register, how the system operates and cost of use.

The bike workshop, which includes facilities such as air pumps and repair tools will be available for use by residents of the development. This emphasis on cycling and sustainable transport should assist in reducing car usage in the development.

9.11.9 Car Parking

The Apartment Guidelines generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

Our review of these 3 categories identified that the site can be categorised as an Intermediate Urban Location. This categorisation is made on the basis that the site is “within easy walking distance (i.e., up to 5 minutes or 400-500m) to / from high frequency (i.e., min 15-minute peak hour frequency) urban bus services”. (Page 6)

With regard to car parking, the Apartment Guidelines set out the following requirements for ‘Intermediate Urban Location’:

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

- Sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;

- Sites within walking distance (i.e., between 10-15 minutes or 1,000-1,500m) of high-capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e., between 5-10 minutes or up to 1,000m) of high frequency (i.e., min 10-minute peak hour frequency) urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services”.

At present, two Dublin Bus routes are located within 120 meters of the site entrance. The northern boundary of the site is located approximately 110m (2 minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 east and stop 3494 west, which is served by Dublin Bus Service No. 44B and Go ahead service 114.

These services operate during peak hours, every 30 mins, and provide connections to nearby urban centres. Neither bus route currently provides connections to the city centre. It is noted that Bus Connects plan for the area include the introduction of bus services 86, 87, 88 and L33, which will provide connections to the City Centre.

The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance.

Transport infrastructure in the area is due to be imminently upgraded by way of the Blackglen Road Improvement Scheme, which is now underway on site. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site once the new infrastructure is in place. It is submitted that the subject site is a prime location for this principle to be applied.

A total of 419 no. car parking spaces are proposed to cater to the residential element of the proposed development. A total of 317 spaces are proposed at basement level. Given the accessible nature of the site and proximity to key public transport, a car parking ratio of 1:1.16 (419 spaces for 360 units) is considered appropriate for the site. This is considered an exceptional provision. We note that the Development Plan makes provision for a reduced level of parking in cases where the site is located proximate to public transport.

9.11.10 Car Club

As noted in the Traffic Impact Assessment prepared by OCSC, local Census data has shown that regular car based travel is lower than normal in this area meaning the need for car parking is naturally reduced. However, it is acknowledged that there may potentially still be demand for such occasional trips by car. On that basis, one of the key proposals within the Mobility Management Plan for the site is the potential for provision of car club vehicles. This will be based on a survey of residents to establish if such a demand exists and, if so, subsequently engage with a car club operator with a view to setting up a station for one or more car club vehicles on-site.

9.11.11 Quantitative Requirements of the Apartment Guidelines

In review of the quantitative requirements of the Apartment Guidelines, we refer An Bord Pleanála to the detailed housing quality assessment included in the Design Statement from O’ Mahony Pike enclosed herewith. Details set out the compliance of each individual residential unit with the guidelines minimum standards.

Urban Development and Building Heights

Guidelines for Planning Authorities

December 2018



9.12.1 Policy Context

The 'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)' which were issued in December 2018 under Section 28 of the 2000 Act set out national planning policy guidelines on building heights in relation to urban areas.

Under section 3.1 of the Guidelines, three following broad principles or criteria must be applied in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

- As set out in accompanying documentation, the proposal secures the relevant objectives of the National Planning Framework. The proposed scheme involves the redevelopment of an existing underutilised, brownfield, infill site in a sustainable location and is considered a unique opportunity for the delivery of strategic housing and the delivery of compact growth in accordance with national strategic planning policy.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?

- This combined Planning Report and Statement of Consistency sets out how the current proposal complies with the provisions of the Dún Laoghaire Rathdown County Development Plan 2022-2028. The current Development Plan has taken account of the requirements set out in Chapter 2 of these Guidelines, but still maintains that maximum heights of 3-4 storeys in areas such as this should apply.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

- It has been clearly demonstrated in the Material Contravention Statement enclosed with this SHD Application that there is a clear misalignment with the National Planning Framework, the Apartment guidelines and the recently adopted Building Height Guidelines.
- We have included building height in the Material Contravention Statement in the event that An Bord Pleanála consider the increase in building height to represent a material contravention of the Development Plan 2022-2028.
- We note, specifically, in National Policy Objective 35 of the National Planning framework. Which seeks an increase in residential density in settlements, through a range of measures including infill development schemes, area or site-based regeneration and increased building heights.

It is our opinion that the subject site has the potential for increased heights to sustainably densify this strategic site having regard to the high-quality architectural composition of the scheme, the open spaces provided and the site's location at a prominent road frontage on Blackglen Road, which will all contribute towards absorbing the proposed building heights.

9.12.2 Specific Planning Policy Requirements

SPPR 3A of the Urban Development and Building Heights Guidelines 2018 requires applicants for planning permission to set out how the proposal complies with the “*criteria above*”. This refers to the Development Management criteria at Section 3.2 of the Guidelines, which are discussed below.

In circumstances where the Board is satisfied that the criteria under section 3.2 have been met, it “may approve such a development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”. The paragraph introducing SPPR 3 itself is set out below for ease of reference, following which, each of the criteria (denoted by italics) are considered in turn:

“Where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).”

SPPR 3 (A)

“It is a specific planning policy requirement that where;

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’. The consistency of the proposal with the National Planning Framework has been considered above.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies a number of criteria. A response to the relevant criteria from the guidelines is set out in brief below:

Development Management Criteria	
At the Scale of the Relevant City/Town	
Assessment Criteria	Comment
<i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i>	<p>The site is served by public transport with high capacity, frequent service and good links to other modes of public transport. The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance. The LUAS provides frequent high capacity services to and from the City Centre. There are bus stops on Blackglen Road and Lamb's Cross which provide good connectivity to the surrounding area and other modes of public transport. The 44b Bus route at Lamb's Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station.</p> <p>The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.</p> <p>These modes of transport provide direct connections through the city region, including the city centre, where residents can easily transfer to other routes and modes for onward connectivity.</p> <p>Transport infrastructure in the immediate area is being upgraded by way of the Blackglen Road Improvement Scheme, which is now underway. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site.</p> <p>It is also noted that Sandyford Road is identified in the Development Plan 2022 as having a 6-year Road Objective, which if delivered, will significantly increase the capacity of the road network, which may support additional bus services available to future residents of the proposed development, in line with Bus Connects.</p>
<i>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.</i>	<p>The proposal is not located within an architecturally sensitive area. However, careful consideration has been given to the successful integration of the scheme into the existing character and topography of the site and area. We note specifically that additional height is only proposed at locations where topography and existing site characteristics are favourable and in keeping within the surrounding development of the area. The proposed development will create a strong and defined frontage along Blackglen Road, albeit with an appropriate setback to protect future residents' amenities and to provide attractive open space and planting. This will support the activation of the site, which will make a positive contribution to the surrounding area by densifying a key underutilised site.</p>
<i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and</i>	<p>The subject scheme seeks to limit urban sprawl by making best use of an existing brownfield site. The proposed development is considered to make a positive contribution in</p>

<p><i>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</i></p>	<p>terms of place- making again through the provision of new pedestrian connections, a new residential amenity building, a new play area, and significantly improved frontage along Blackglenn Road.</p> <p>The main open space by virtue of its sense of enclosure and orientation creates a strong sense of place, security and privacy for all residents of the development. The subject scheme includes the provision of 5,008 sq.m of communal open space for future residents which has been subject to detailed design by Gannon and Associates Landscape Architects.</p> <p>The open spaces will enhance the quality of living of future occupants and thus will positively contribute to place making.</p> <p>The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an underutilised brownfield site, creating a clear definition to the urban edge along Blackglenn Road and providing varied and visual interesting façade for the surrounding streetscape.</p>
<p align="center">Development Management Criteria</p>	
<p align="center">At the scale of district/ neighbourhood/ street:</p>	
<p><i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i></p>	<p>In terms of the built environment, there are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Area on the subject Site. There is however, a ruined building, that is outside the application site, but adjacent to the boundary, and which is believed to have been occupied by Constance Markiewicz in the time leading up to the Easter Rising of 1916.</p> <p>The structure is the ruin of two semi-detached cottages, the northern of which is the smaller of the two and is the portion with the Constance Markiewicz connection.</p> <p>The layout of the proposed development will not involve construction in the immediate vicinity of the ruin. The roadway through the site will be at a distance of 15 metres, and the nearest apartment building is to be some 30 metres from the ruin.</p> <p>The proposal responds to the natural and built environment for the reasons set out under the response to ‘at the scale of the relevant city/town’ above. Careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development and local topography.</p> <p>The high-quality design of the proposed development will allow the development to be integrated into the surrounding area, as noted above, will positively enhance the legibility and streetscape of the surrounding area. The development strikes a balance between respecting the residential amenity of the existing 2 storey residences , and also using intensity and residential density in a sustainable manner on accordance with the national, regional and local policy.</p>

<p><i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i></p>	<p>Careful consideration has been given to ensure that a monolithic appearance is avoided. Appropriate use of materials and fenestration details as proposed by O' Mahony Pike Architects has ensured that the building fabric is well considered. We refer to the O'Mahony Pike drawings and the Design Statement enclosed herewith for further details.</p> <p>The development utilises an important vacant site along the R113, improving the streetscape and delivering a new identity to the area. The high quality design proposed will ensure that the development will be legible and attractive when viewed from Blackglen and Woodside Road.</p>
<p><i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)</i></p>	<p>The proposed development will significantly enhance the Blackglen Road. It will provide for a high-quality contemporary development at an appropriate location and make a significant contribution to the existing streetscape.</p> <p>The proposal introduces a development which is compatible with its land use zoning and adjacent residential developments. The additional height proposed makes optimal use of an underutilised area of land which benefits from a strategic location. The layout of the residential blocks contributes to a sense of place and benefits from passive surveillance from the residential buildings.</p> <p>As set out above, the proposal offers significant enhancement to the local public realm by way of new pedestrian connections, open spaces and together with the upgrades which are underway to the Blackglen Road will significantly improve frontage along the Road. There is no inland waterway or marine frontage within the current proposal. We refer to the material from OCSC included herewith, which provides for comment on flood risk.</p>
<p><i>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.</i></p>	<p>The proposed development will create a new urban edge and interface with Blackglen Road. This is a positive element of the development enhancing the public realm and the high quality design of the scheme will ensure the development to be an attractive addition to the area.</p> <p>Legibility, navigability and permeability will be enhanced by the creation of the new pedestrian connection through the site which is delivered by way of a comprehensive landscape plan and specifically a series of permeable connections through the site and quality areas of open space.</p>
<p><i>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</i></p>	<p>The environs of the subject site have generally been comprised of low-rise, low-to-medium density residential development. The predominance of this proposed development is evidenced in the established areas of Sandyford Downs, Hillcrest Road, Sandyford Road and Sandyford Village.</p> <p>The proposed scheme seeks to contribute towards reducing the deficit in Dublin's housing supply, and will contribute to the mix of unit typologies, offering a residential mix of 123 x 1 beds (34.2%), 224 x 2 beds (62.2%) and 13 x 3 beds (3.6%) in the area.</p> <p>In addition, we note that the proposal offers a significant residential amenity offering by way of a new residential</p>

	amenity building and large creche within the development site. The subject site is a key underutilised infill site and provides a prime opportunity to provide a residential development of suitable height, scale and mass that will result in the appropriate densification of the site.
Development Management Criteria	
At the scale of the site/building:	
<i>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</i>	<p>The proposed development has been carefully designed to ensure that there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites. The Daylight & sunlight Assessment prepared by O' Conor Sutton Cronin Consulting Engineers, enclosed herewith, confirms that there are acceptable levels of natural daylight and sunlight.</p> <p>Internal daylight within the proposed development</p> <p><i>"The analysis confirms that across the entire development excellent levels of internal daylight are achieved. The majority of apartments not only meet but greatly exceed the recommendations outlined within the BRE Guidelines and British Standard BS8206, achieving a 99.3 % compliance rate across the proposed apartments. Similarly, when compared against the 2022 Methodology, third edition of the same document, a pass rate of 94.5% has been achieved across the development."</i> (Page 90)</p> <p>Sunlight to proposed development amenity spaces</p> <p><i>"In terms of sunlight access, excellent levels of sunlight are experienced across the proposed development. The communal amenity spaces provided exceed the BRE guidelines for sunlight on the test day of 21st of March"</i> (Page 91)</p> <p>Sunlight to windows within the proposed development</p> <p><i>"The annual probable sunlight hours assessment has shown that 60% of windows across the development achieve the recommended APSH values stated in the BRE Guidelines, while 62% of windows achieve the recommended values during the winter months, when sunlight is more valuable"</i> (Page 91)</p> <p>Impact to surrounding properties</p> <p><i>"The analysis has shown that negligible impact will be perceived in terms of daylight access to any of the surrounding properties.</i></p> <p><i>The overshadowing images have demonstrated that the only impact to adjacent properties will be to those located to the East of the proposed development. A minimal impact will be perceived on March 21st after 3 p.m"</i> (Page 91)</p> <p>Overall, it can be concluded that the scheme design is supported in terms of access to daylight and sunlight with no significant impacts within the development or to adjoining dwellings.</p>
<i>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)</i>	As noted above, the Daylight/Sunlight Assessment and the Landscape Visual Impact Assessment ultimately

or BS 8206-2: 2008 – ‘Lighting for Buildings - Part 2: Code of Practice for Daylighting’	demonstrates that no material impacts will occur on neighbouring properties.
<i>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</i>	As part of a compensatory design solution, prepared by O’Connor Sutton Cronin Consulting Engineers, the rooms that do not meet the recommended minimum average daylight factor, the proposed development has incorporated a number of compensatory design measures included in the Daylight and Sunlight Analysis.
Development Management Criteria	
Site Specific Assessments	
<i>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.</i>	We refer to the enclosed Wind Assessment by OCSC which demonstrates that the proposed development will create a pleasant environment for pedestrian comfort throughout the year.
<i>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.</i>	The appointed ecologists, Enviroguide have confirmed that the matter of collision for bird or bat species is not a significant phenomenon known in Ireland. We can confirm that the impact of lighting on bats has been fully considered as set out in the enclosed Lighting Report from OCSC.
<i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i>	Given the modest heights of 5 and 6 storeys, there is no impact on important telecommunication channels/microwave links. Please find Telecommunications Report prepared by ISM which accompanies this application.
<i>An assessment that the proposal maintains safe air navigation.</i>	In preparation of this planning application, the applicant has entered into discussions with the IAA who had no significant comment to make on the proposal. As identified in the appendix to the rear of this report, the IAA in their review dated 8 th August 22 concluded that: “ I wish to advise that we have no observations on this application from the Safety Regulation Division Aerodromes”.
<i>An urban design statement including, as appropriate, impact on the historic built environment.</i>	A comprehensive Design Statement has been prepared by O Mahony Pike and is enclosed herewith. This statement addresses the site context and proposed design in urban

	<p>design terms and sets out in clear detail the design rationale for the current proposal submitted.</p> <p>A landscape and Visual Impact Assessment prepared by Modelworks , and verified views prepared also by Modelworks have also been included with this planning application in order to provide a complete overview of the subject design.</p>
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.”	<p>An <i>Appropriate Assessment Screening Report, Environmental Impact Assessment Screening Report, Ecological Impact Assessment Report</i> and <i>Article 299B Statement</i>, prepared by Enviroguide, have been submitted with this planning application.</p>

Table 13 - Development Management Criteria

Based on the foregoing analysis, the proposed development complies with the relevant criteria set out in the Building Height Guidelines 2018 and, in particular, the SPPR 3 and the relevant development criteria requirements.

It is our professional planning opinion that the subject site is capable of achieving additional height and density having regard to the introduction of the *NPF* and the *Building Height Guidelines*, which encourages increased height and density on appropriate sites, particularly as this site is severely underutilised in this sustainable location. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area having regard to the position of the highest forms at the least sensitive locations at the subject site

Therefore, the Board is enabled to grant permission for the proposed development, comprising buildings ranging from 2 to 6 storeys in height and associated residential density.

We submit to the Board that the proposal is consistent with the Urban Development and Building Height Guideline for planning authorities (2018).

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

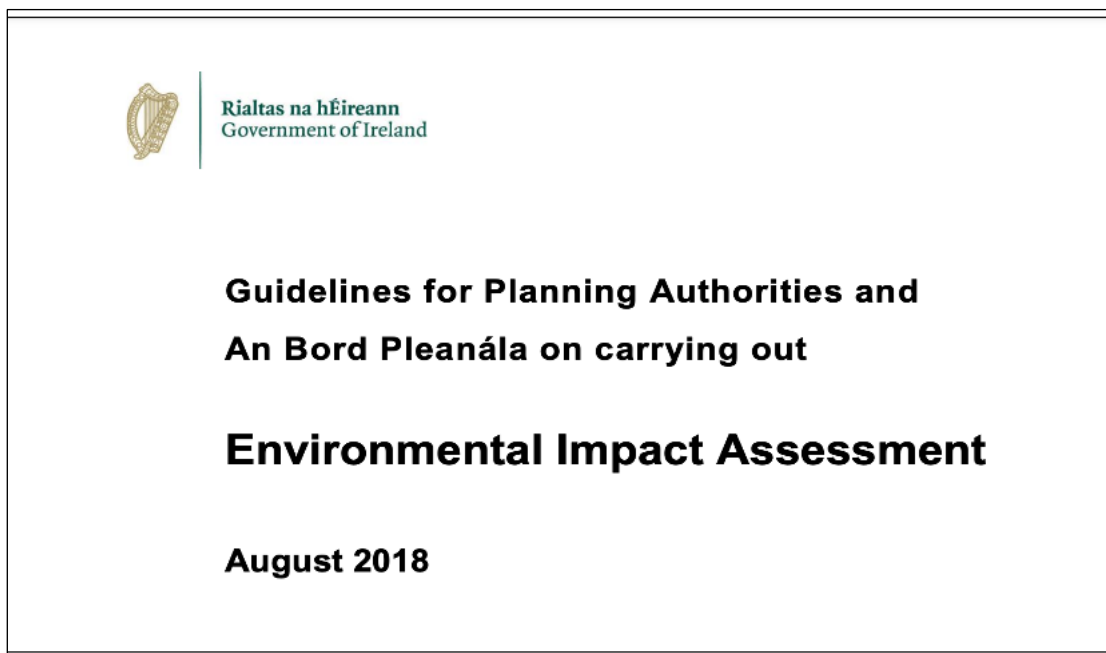


The 'Design Manual for Urban Roads and Streets' (DMURS) 2013, and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. A key element of the DMURS is the need to design roads and streets as destinations rather than traffic corridors. As such, a focus is placed upon the needs of pedestrians, cyclists, public transport users and enhancement of the public realm.

The proposed development creates a transport hierarchy providing primacy to pedestrians and cyclists through the introduction of shared surfaces, pedestrian-only areas, and traffic-calming in accordance with DMURS and current best practice. Vehicular movements are designed to be indirect so as to reduce speed and give primacy to cyclists, pedestrians, and the communal activity.

The subject application is accompanied by a number of additional documentations, including a DMURS Statement of Compliance and Traffic and Transportation Assessment prepared by O'Connor Sutton Cronin Consulting Engineers. Same details the scheme's compliance with DMURS – for full details, please refer to same.

9.14 **Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, dated August 2018, issued pursuant to s.28 of the 2000 Act**



Certain public and private projects that are likely to have significant effects on the environment are subject to EIA requirements derived from EIA Directive 85/337/EC (as amended by Council Directive 97/11/EC, Directive 2003/4/EC, Directive 2009/31/EC, Directive 2011/92/EU and recently Directive 2014/52/EU which amends EIA law in a number of respects by amending Directive 2011/92/EU) which are designed to ensure that projects likely to have significant effects on the environment are subject to a comprehensive assessment of environmental effects prior to development consent being given. Article 2 of Directive 2014/52/EU provides that Member States shall bring into force the laws, regulations, and administrative provisions necessary to comply with the Directive by 16 May 2017.

The Department of Housing, Planning, and Local Government has brought forward amendments to the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001-2018 to provide for the transposition of the Directive into the Irish planning code. To this effect, the European Union (Planning and Development)(Environmental Impact Assessment) Regulations 2018 have now transposed the 2014 Directive into Irish law.

The Department has also provided an updated to the 2018 “Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment” to provide practical guidance on legal and procedural issues arising from the requirement to undertake EIA in accordance with Directive 2014/52/EU. These new Guidelines – ‘Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment’ were published in August 2018.

Projects requiring EIA are defined in Article 4 and set out in Annexes I and II of the Directive. All projects listed in Annex I require an EIA. For projects listed in Annex II, national authorities may set thresholds/criteria or determine effects on a case by case basis. Where a project is of a specified type but does not meet, or exceed, the applicable threshold then the likelihood of the project having significant effects on the environment needs to be considered. This is done by reference to the criteria specified in Annex III of the Directive.

National Thresholds

Schedule 5 of the Planning and Development Regulations 2001 (as amended) transposes Annex I and II into Irish law. Part 2 of Schedule 5 includes the following Annex II infrastructure projects and thresholds that are of relevance to the proposed development.

10. Infrastructure projects –

(b) (i) Construction of more than 500 dwelling units.

(b) (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.

(b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

Built-up area means a city or town (where “city” and “town” have the meanings assigned to them by the Local Government Act, 2001) or an adjoining developed area.

The proposed development provides for a total of 360 no. apartment units, therefore, a mandatory EIAR is not required in respect of 10(b)(i).

In terms of land area, the site extends to 3.70 hectares. The site area is zoned. The site area is below the 10 ha. threshold. Therefore, a mandatory EIA is not required in respect of 10(b)(iv).

In addition, as required under Article 299(B)(1)(b)(ii)(II)(C), the results of the Appropriate Assessment Screening Statement carried out under the provisions of the Habitats Directive have been taken into consideration in this report. It is noted that the AA Screening concludes that the proposed development, alone and in combination with other plans and projects, is not likely to have significant effects on a Natura 2000 site (conservation objectives).

The screening report has been prepared to accompany this application to An Bord Pleanála. The report has assessed the potential impact of the proposed development on the environment. The proposed development is below the thresholds for mandatory EIA. It is considered (for reasons more comprehensively detailed therein) that a sub-threshold EIA is not required for the following reasons:-

- Surface water will discharge to the local drainage network in accordance with SUDs.
- No impacts on Natura 2000 sites are envisaged.
- New planting as part of the development will result in long term benefits to biodiversity.

Therefore, no significant effects on the environment are envisaged.

9.15 Climate Change and Low Carbon Development Act 2015

For completeness, and for the benefit of the Board in considering the within application, it is noted that section 15 of the Climate Change and Low Carbon Development Act 2015 relates to the “*duties of certain bodies*” and requires that such bodies perform their respective functions, in so far as is practicable, in a manner “*consistent with*” specified matters.

In this regard, s.15(1)(a) to (e) set out a number of matters in respect of which the Board is required to exercise its functions in a manner consistent with (in so far as that is practicable). It is therefore considered appropriate to consider the proposed development by reference to the matters at (a) to (e) of section 15(1) as amended.

It is submitted that the proposed development is consistent with the most recent approved climate action plan as it will provide a medium to high density residential development in close proximity to existing community facilities and amenities. The proximity will reduce the need of future residents to travel long distances by car because of its close proximity to public transport which will help reduce greenhouse car emissions.

In addition, the provision of more housing in this location will support the existing public transport serving the area and will make the provision of further public transport options (such as a further increase of the frequency of services – although it is noted that high capacity and frequent public transport already serves this locus) viable and worthwhile in the future. This will help the overall transition to more sustainable modes of transport and a reduction in our greenhouse gas emissions.

The development has been designed to give pedestrians and cyclists priority over cars which will help to encourage cycling and walking as a mode of transport especially those attending the nearby schools and working within the area. Movement away from the car as the main mode of transport will be key to achieving our climate change aims and it is hoped that the proposed development will encourage this change. The provision of car parking spaces throughout the site is an acknowledgement of the fact that this change will not happen overnight, and people in this location will likely still have their own cars. However, 80 no. car parking spaces will be equipped with electric charging points as part of the proposal.

The Building Lifecycle Report prepared by Aramark in relation to the proposed development has been reviewed and used to inform the operational phase climate assessment. This report outlines a number of measures in relation to building materials and energy usage for the proposed development. A number of measures have been incorporated into the overall design of the development to reduce the impact to climate where possible.

Furthermore, the inclusion of green roofs will also help with decarbonisation and the reduction of greenhouse gas emissions.

The proposed development has been designed and the within application documentation, has been prepared, in so far as is practicable, in a manner which ensures that the Board can comply with the requirements of s.15(1) of the Climate Change and Low Carbon Development Act 2015, as amended (insofar as same might apply to the functions of the Board, including in the determination of the within application)

Having regard, to the Screening Assessments for EIA and AA, the Ecological Impact Assessment, Art.299B Statement, the Flood Risk Assessment, Building Lifecycle Report and other relevant application documentation, and, in light of the matters set out in same, it is submitted that the proposed development gives rise to no inconsistency by reference to the matters set out in s.15(1) of the 2015 Act, which include, *inter alia*, the Climate Action Plan 2021. In the circumstances, it is submitted that the application documentation enables the Board, as decision maker to comply with the aforesaid statutory requirements under s.15(1) of the 2015 Act, as amended. The exercise by the Board of the function of making a decision to grant permission for the proposed development can be made by the Board in a manner consistent with the matters set out in s.15(1) of the 2015 Act as amended.

10 LOCAL PLANNING CONTEXT

10.1 Dun Laoghaire – Rathdown Development Plan 2022-2028

The Dun Laoghaire Rathdown County Development Plan 2022-2028 is the relevant statutory planning context for the subject site after being adopted on the 10th of March 2022 and coming into effect on the 21st of April 2022. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

10.2 The Core Strategy

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

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

The vision Statement for the Development Plan 2022-2028 –

“The vision for Dun Laoghaire-Rathdown is to embrace inclusiveness, champion of quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver this in a manner that enhances our environment for future generations.”

The Dun Laoghaire Rathdown Development Plan has continued to promote and develop higher density, more sustainable development throughout the lifetime of this plan. As set out in the Core Strategy, between 2022 and 2028, the regional planning guidelines have allocated approximately 32,550 – 49,375 housing units to be built in the Dun Laoghaire Rathdown area. That is roughly 5,425 – 8,229 a year. As a result, significant emphasis has been put on the delivery of houses.

Increasing the overall number of units within the Sandyford area in a sustainable, high quality manner is consistent with the core Strategy of the County. The proposed development consolidates development in a built-up area served by existing public transport.

10.3 Housing

Population and Housing Trends

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

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

Table 14 DLR Core Strategy – Population Projections

There has been a significant increase in housing completion levels from that experienced during the financial and property crash with housing completion levels now averaging c. 1,200 units per annum. Looking at the most recent intercensal period between 2011 and 2016, population increased by 11,757 people while housing stock only increased by 1,066 units. This represents an enormous undersupply in housing units. Therefore, this subject proposal would provide an increase in 360 no. new housing units for the population of the County.

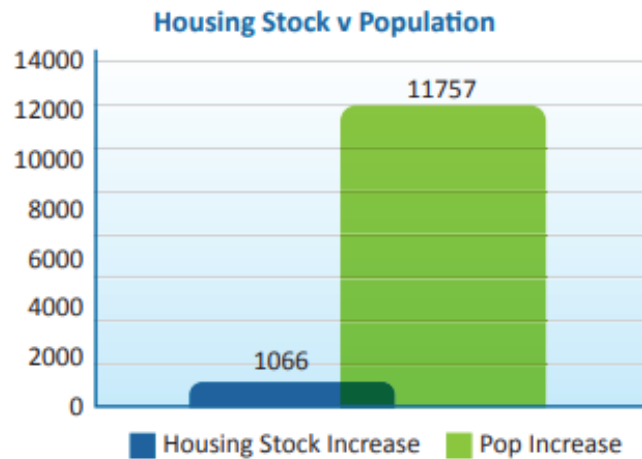


Figure 22 - Housing Delivery v Population Growth 2011-2016

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

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

Table 15 - Core Strategy Housing Target

Figure 19 below highlights the Housing Land Availability Study. The subject site is located in the area highlighted being Infill/Windfall lands with a capacity to provide for 4,571 units within the lifetime of the Plan.

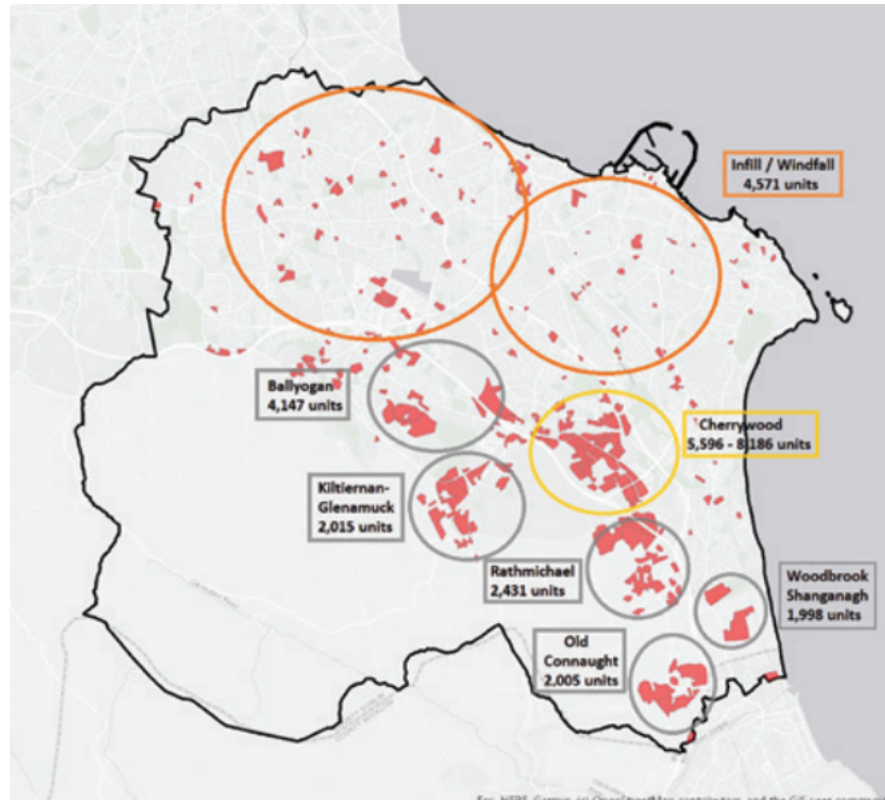


Figure 23 - Residential Development Capacity Audit – Aggregate Data

The subject proposal is consistent with the Core Strategy of the Development Plan by providing 360no. new residential units on serviced lands in close proximity to an established urban area.

10.4 Planning Policy

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

Matters of compliance with land use zoning objectives, Key Development Objectives and Development Management Standards have been set out in detail in the Planning Report, prepared by Brock McClure Planning Consultants, which accompanies the application for permission.

Policy Ref.	Policy	Applicant Response
PHP1	<p>That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:</p> <ul style="list-style-type: none"> - Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. - Accord with the Core Strategy set out in Chapter 2, the Housing Strategy, and Interim Housing Needs Demand Assessment for the County in Appendix 2 	<p>As detailed in the application documentation, the proposed development is in line with the NPF and the RSES, the site is zoned residential and is considered appropriately serviced with infrastructure to deliver a sustainable residential development in close proximity to the main town centre and public transport nodes.</p> <p>In addition, the proposal also accords with the core strategy as set out in Chapter 2 of the Development Plan 2022-2028, the Housing</p>

	<p>and/or the provisions of the future Regional Housing Need Demand Assessment</p> <p>- Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.</p>	<p>Strategy and the HNDA, as it provides Social housing under Part V (36 no.).</p> <p>As part of this development, 36 units are to be provided for social housing. In keeping with Housing Strategy, the units which will be provided are:</p> <p style="text-align: center;">1-beds - 9 (25%) 2-beds - 24 (67%) 3-beds - 3 (8%)</p> <p>We refer the Board to the proposed residential mix enclosed herewith, which is outlined in the development summary section at the rear of the Design Statement prepared by OMP Architects</p> <p>The residential mix provided for by the proposed development is considered appropriate and in line with ministerial guidance contained within the 2020 Apartment Guidelines. Given the specific requirements of the Development Plan in relation to mix, the Material Contravention Statement enclosed herewith outlines further details on the mix proposed vis-à-vis the Development Plan requirements.</p>
<p>PHP5</p> <p>PHP 6</p>	<p>It is a Policy Objective to:</p> <p>- Implement a strategy for residential development based on a concept of sustainable urban villages.</p> <p>-Promote and facilitate the provision of '10-minute' neighbourhoods.</p> <p>It is a Policy Objective to:</p> <p>- Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.</p> <p>- Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.</p>	<p>The proposed development is well served by transport with high capacity, frequent services. The site is situated just West of Lamb's Cross. It has a number of transport links within walking distance of peak time routes, and a 9 minute cycle to the Glencairn LUAS to the East.</p> <p>With high frequency and high-capacity urban public transport stops within walking distance, this development site is appropriate for residential development of a higher density. The Glencairn LUAS is a 9minute cycle from the site and 2 no. Dublin bus stops are within 120 meters of the site.</p> <p>A childcare facility of c. 401 sq. m is proposed on the ground floor of Block A1. The Creche has been designed to have capacity for the childcare needs of the proposed development and is located at the entrance of the development, to facilitate ease of access. The creche is afforded appropriate outdoor play space and car parking to serve staff and drop off.</p>
PHP18	<p>It is a Policy Objective to:</p> <p>- Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.</p> <p>- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance</p>	<p>The overall proposed development provides for a residential density of 97.3 units per ha based on the substantive development area of 3.7oha, and a proposal for 360 units on a central site. This residential density is considered appropriate to the site given the proximity of the site to the public transport corridor.</p>

	<p>between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.</p>	<p>Enclosed with this application is the Design Statement prepared by O'Mahony Pike Architects. It refers to the proposed site as offering a unique opportunity to achieve greater building height and residential density and is considered to deliver on the very spirit and intent of the requirements of the national policy mandate for higher residential densities at key locations.</p> <p>The proposed development along the Blackglen Road, positively contributes to its surrounding neighbourhood and streetscape by virtue of its context sensitive and carefully considered design. It will provide for high quality contemporary design at an appropriate location and make a significant positive contribution to the existing urban neighbourhood and streetscape at this location. In this respect, the proposals are considered to be of an appropriate scale, height, and massing to complement the existing urban form whilst successfully introducing a high-quality element of architecture to the site, making optimal use of the strategic, prominent location.</p> <p>As detailed in the application documentation, the proposed residential development is in keeping and consistent with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities'. The proposal also complies with the 'Irish Design Manual for Urban roads and streets', as outlined in the DMURS Compliance statement prepared by O Connor Sutton Cronin Consulting Engineers</p>
PHP20	<p>It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.</p>	<p>As evidenced in the application documentation, the proposed development takes the context of its surrounding developments into account in terms of design, block formation, height, and density.</p> <p>The proposal utilises a key infill site on a prime suburban site within the metropolitan area of Dublin. It is located on a key public transport corridor. Relevant policy documents have been carefully referred to, to establish appropriate density, height, and car parking provision.</p> <p>The layout and public realm elements of the development prioritise pedestrian linkages, connectivity, and amenity in order to best utilise the transport and open space amenities in the immediate facility.</p>
PHP25	<p>It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Interim Housing</p>	<p>As noted above the proposed development accords with Housing Strategy and HNDA.</p>

	Need Demand Assessment (HNDA) 2022 – 2028.	
PHP26	It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Interim Housing Need Demand Assessment (HNDA) and any future Regional HNDA.	The subject proposal aims to rebalance residential density in the area and provides a variety of one, two and three bed unit typologies to cater for the current lack of supply of this type in the area. Proposals for heights of 4 storeys transitioning to a height of 6 storeys are well considered and cognisant of established levels of residential amenity in the area.
PHP29	<p>It is a Policy of the Council to;</p> <ul style="list-style-type: none"> - Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES. - Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties. - Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community. 	<p>We note that the proposal provides for 1 bed, 2 bed and 3 bed apartments on a subject site that is well served by public transport with high capacity, frequent services.</p> <p>The site is situated just West of Lamb’s Cross. It has a number of transport links within walking distance of peak time routes, and a 9-minute cycle to the Glencairn LUAS to the East.</p> <p>With high frequency and high-capacity urban public transport stops within walking distance, this development site is appropriate for residential development of a higher density. The Glencairn LUAS is a 9-minute cycle from the site and 2 no. Dublin bus stops are within 120 meters of the site.</p> <p>The apartments will also be built to comply with the relevant accessible standards. It is therefore submitted that the proposal is appropriate for independent and assisted living for persons within the categories referred to.</p>
PHP30	It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’.	<p>The Part V proposal is based on the provision of 10% of the units. These units are identified on plan and schedules submitted herewith. 36 no. units are proposed.</p> <p>We refer An Bord Pleanála to the Part V Brochure enclosed herewith, which details the location of the Part V units; the floor plans, elevations, and layouts for the units; and the appropriate costings.</p>
PHP31	It is a Policy Objective to support the provision of homeless accommodation and/or support services throughout the County.	This proposal contributes positively to the current national shortfall in housing supply. Large residential developments will assist in addressing the ongoing housing and homelessness crisis, in an effort to increase housing supply.

PHP34	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. - Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013). - Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design. 	<p>The proposed development takes into account the Urban Design Manual and Design Manual for Urban Roads and Streets (DMURS), as updated, in order to help develop a sense of place (as set out in the application documentation).</p> <p>We note specifically that Section 9.13 of the combined Planning Report and Statement of Consistency Report, which reviews in detail the requirements of the Urban Design Manual, with a clear compliance of the scheme with same identified.</p> <p>We also refer to the Design Statement submitted by O' Mahony Pike Architects for further details on matter of context, connectivity, inclusivity, public realm, adaptability, privacy and amenity, parking, and detailed design items.</p> <p>The proposed development takes the context of its surrounding developments into account in terms of block formation, height, and density. The layout and public realm elements of the development prioritise pedestrian linkages, connectivity, and amenity in order to best utilise the transport and open space amenities in the immediate facility.</p>
PHP35	<p>It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability, or disability consistent with RPO 9.12 and 9.13 of the RSES.</p>	<p>The proposed development is accessible universally. O' Mahony Pike Architects have included a detailed drawing detail with the drawing pack submitted setting this out.</p>
PHP36	<p>It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.</p>	<p>The proposed development will contribute positively to the public realm by providing a pedestrian and cyclist linkages accessible to the wider community.</p> <p>We refer An Bord Pleanála to the Design Statement prepared by O' Mahony Pike Architects and the Landscape Booklet has been prepared and submitted by Gannon + Associates Landscape Architects, both submitted, for further details on how the proposal enhances the local public realm.</p>
PHP37	<p>It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).</p>	<p>The proposed public open green space has been intentionally integrated into the surrounding areas green infrastructure with new pedestrian access proposed along Blackglenn Road and Woodside Road, creating the possibility for a future connection between Fitzsimmons Woods and Ticknock mountains.</p>

PHP39	<p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> - Encourage high quality design of all new development. - Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF). 	<p>The proposed development is in keeping with the National Planning Framework and the provisions of the recently adopted Urban Development and Building Height, Guidelines for Planning Authorities (2018). The compliance of the proposal with the Building Height Strategy has been set out in the application documentation submitted.</p> <p>An analysis of the impact of building height and positioning of buildings has been carried out through specific assessment criteria including sunlight and daylight access analysis, visual impact assessment and wind analysis, which demonstrate that the design proposals are appropriately considered which have confirmed that no adverse or negative impacts arise. These assessments are submitted as part of the application.</p>
PHP41	<p>It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual – A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.</p>	<p>A Design Statement has been prepared and submitted by O'Mahony Pike Architects and accompanies this application which sets out how the proposed development addresses or responds to the design criteria set out in the Urban Design Manual – A Best Practice Guide.</p>
T16	<p>It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES).</p>	<p>A Traffic and Transport Assessment has been submitted by O'Connor Sutton Cronin Consulting Engineers as part of this application.</p>

Table 16 - Development Plan Policy Compliance

10.5 Transitional Zoning

The site is located proximate to a zoned area of open space to the north:

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

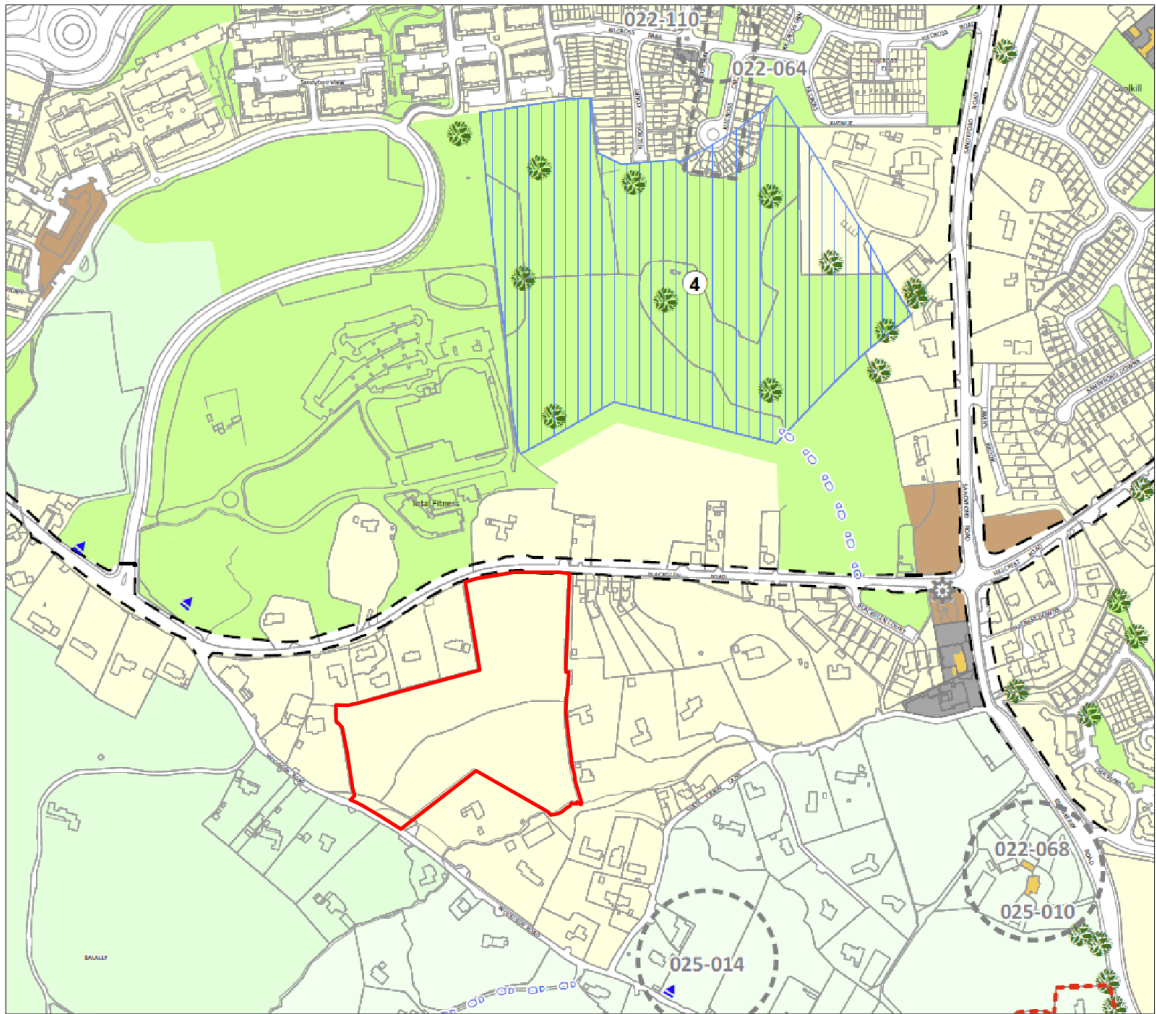


Figure 24 - Zoning map with site outlined in red

Section 13.1.2 of the Development Plan sets out that:

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

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

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

Notwithstanding this, it is our opinion that it could be interpreted that a Material Contravention in respect of a transitional zoning is occurring in this instance, and this is a matter for An Bord Pleanála to ultimately adjudicate on.

10.6 Ecological Network

The subject site is not identified as being ecologically notable, in the context of the Ecological Network Map (Map B) of the County Development Plan. However, the site could act as a link between the sensitive B and G zoned lands to the south and west and the NHA of Fitzsimons Wood to the north east of the site:

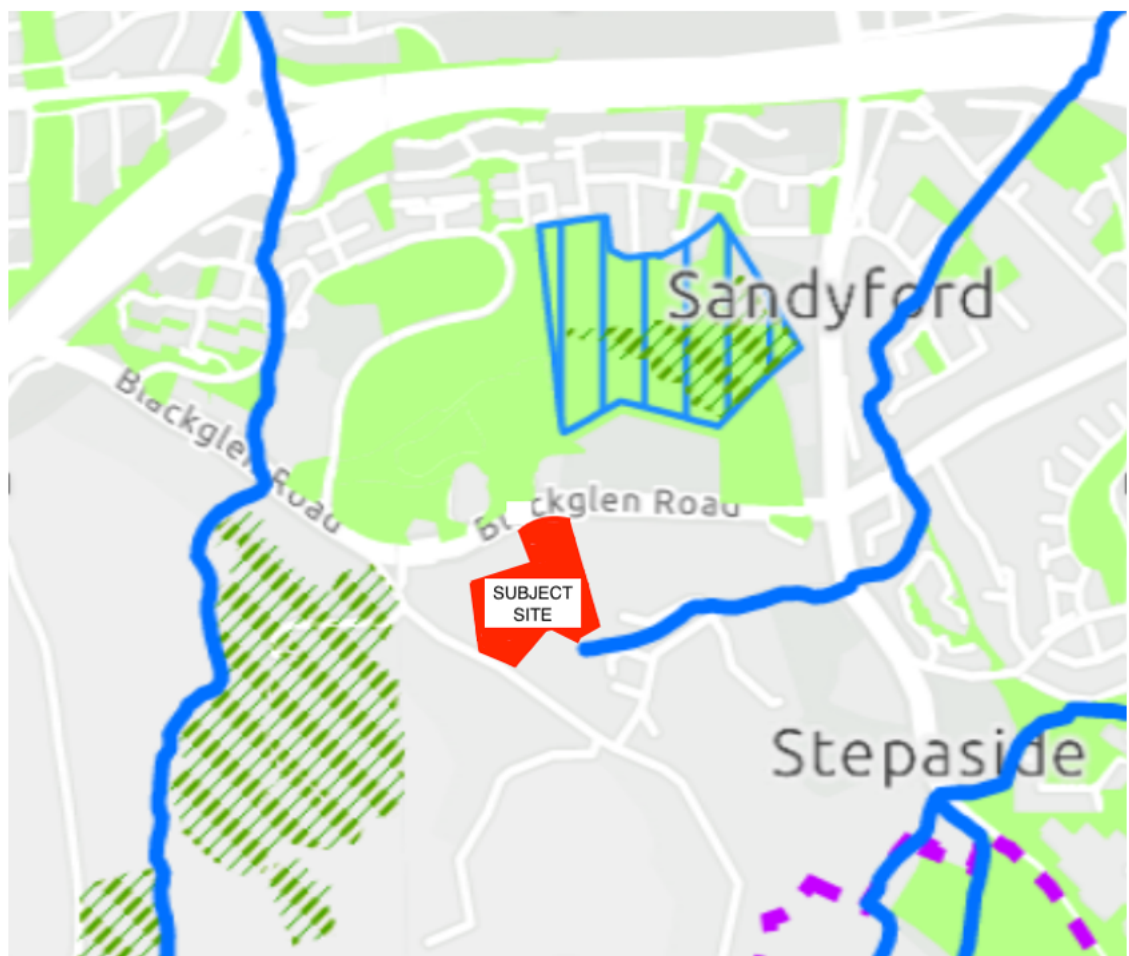


Figure 25 - Extract from Map B, site highlighted in red

The design team are mindful of this context and the landscape design has been developed to accentuate linkages and green routes through the site.

The site is also a transitional zone ecologically between the lowlands of Fitzsimons Wood and the existing Oak Holly, Birch vegetation therein and the uplands of the Dublin Mountains. The landscape design of the proposed site aims to accentuate this transition and proposes that the planting scheme will transition mid-way through the site from the lowland Oak Holly and Birch vegetation to the upland Gorse, Heather and Pine.

We trust the Board will note that a key component of the landscape design of the proposed development is to create a landscape that is of the land and landscape character of the wider receiving

environment. As detailed on the enclosed drawings, the scheme uses an indigenous planting palette of hard and soft landscaping from locally sourced granite to a native Irish planting scheme.

10.7 Separation Distances

Section 12.3.5.2 of the Development Plan stipulates that clearance of 22m is required between opposing windows and above ground floor level. Further details on Separation Distances can be seen in Section 8.4 of this combined Planning and Statement of Consistency Report. To note the proposed development fully complies with the required separation distances.

10.8 Housing Mix

Section 12.3.3.1 of the County Development Plan 2022-2028 sets out the requirements in relation to the mix of units provided as part of new apartment development as follows:

“planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County”

For clarity, the percentage of 1 bed units currently proposed is 34.2%.

Area	Requirement	Proposed
Existing Building Up Area	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination on of one bed and studios and no more than 20% of the overall development as studios Minimum 20% 3+ bedroom units	34.2 % 1 Bed Units 62.2% 2 Bed Units 3.6 % 3 Bed Units

Table 17 - Apartment Mix Requirement

232 of the 360 apartment units, (64%) are more than 80sqm in size which provides an appropriate level of larger 2 bed units that enhances the mix proposed. We additionally note in the context of these requirements that the policy document 2020 ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ contains a Specific Planning Policy Requirement in relation to dwelling mix requirements (SPPR 1), which takes precedence over any conflicting policies and objectives of the 2022-2088 County Development Plan.

10.9 Minimum Apartment Floor Areas

Section 12 of the Development Plan 2022-2028 stipulates that the minimum size of habitable rooms for apartment units shall conform with the national standards as set out in the ‘Sustainable Urban Housing: Design Standards for New Apartments (2020). /these minimum standards are included in Table 12.4 of the Development Plan which is included below for reference.

All units in the proposed development will meet the minimum floor area requirements set out in the Design Standards for New Apartments and Development Plan 2022-2028. A Housing Quality Assessment (HQA), prepared by O’Mahony Pike Architects and is enclosed within this application. The table below highlights the difference in size of the proposed units when compared to the minimum standards.

Unit Type	No of Units	Required	Proposed
1 Bed Unit	123	45 sq.m	48.4sq.m - 51.4sq.m.
2 Bed unit (3P)	27	63 sq.m	67sq.m. – 77.3sq.m.
2 Bed unit (4P)	198	73 sq.m	74.8sq.m. -103.7sq.m.
3 Bed Unit	13	90 sq.m	95.3sq.m – 107.5sq.m
TOTAL	360		

Table 18 - Apartment Floor Areas

10.10 Internal Storage Space

Section 12 of the Development Plan 2022-2028, in particular Section 12.3.5.3, highlights the minimum requirement for internal storage space per apartment.

All proposed units will meet the minimum internal storage area requirements set out in the Design Standards for New Apartments and Development Plan 2022-2028. A Housing Quality Assessment (HQA), prepared by O'Mahony Pike Architects and is enclosed within this application. The table below highlights the difference in size of the proposed units when compared to the minimum standards.

Unit Type	No of Units	Required	Proposed
1 Bed Unit	123	3 sq.m	2.9sq.m - 3.6sq.m.
2 Bed unit (3P)	26	5 sq.m	5.1sq.m. – 6.3sq.m.
2 Bed unit (4P)	196	6 sq.m	6.0sq.m. - 9.2sq.m.
3 Bed Unit	15	9 sq.m	9.4sq.m. – 10.9sq.m.
TOTAL	360		

Table 19 - Internal Storage Space

10.11 Residential Density

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

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

Policy Objective PHP18: Residential Density

- Promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites
- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”

“It is a Policy Objective to:

The overall development provides for a residential density of 97.3 units per ha based on the substantive development area of 3.7ha, and a proposal for 360 units on a central site.

This residential density is considered appropriate to the site given proximity of the site to the public transport corridor. The site is situated just West of Lam’s Cross. It has a number of transport links within walking distance of peak time routes, and a 9 minute cycle to the Glencairn LUAS to the East.

With high frequency and high-capacity urban public transport stops within walking distance, this development site is appropriate for residential development of a higher density. The Glencairn LUAS is a 9-minute cycle from the site and 2 no. Dublin bus stops are within 120 meters of the site.

The site is considered to offer a unique opportunity to achieve greater building height and residential density and is considered to deliver on the very spirit and intent of the requirements of the national policy mandate for higher residential densities at key locations.

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

10.12 Open Space

Section 12.8 of the Development Plan sets out the requirements for public open space and recreation. It states that for developments of 10+ residential units, a Landscape Design Rationale must be submitted with the application. We can confirm that a detailed ‘Landscape Design Statement’ has been prepared by Gannon + Associates Landscape Architects and submitted with the application. The public open spaces requirements as set out in the Development Plan states that ‘Residential Developments in the existing built up area’ require a minimum of 15% of the site area

With regard to open space requirements, Section 12.8.3.1 of the Development Plan states that a requirement of 15 sq.m - 20 sq m of Open Space per person shall apply based on the number of residential/housing units. This is assumed on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms. The Development Plan however clearly sets out that the Planning Authority shall require an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space irrespective of the occupancy parameters set out in the previous paragraph.

- The Development Plan also clearly sets out that the Planning Authority shall require “an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space irrespective of the occupancy parameters.”
- Based on the above Development Plan provisions, we note the following requirements for open space:

- (347 no. 1 or 2 bed units x 1.5 persons) = 520.5 persons
- (13 no 3 bed units x 3.5 persons) = 45.5 persons

This provides for a total of 566 persons, and based on the requirements for 15 – 20 sq. m of open space per person, we note an identified requirement of 8,490 sq. m – 11,320 sq. m.

However, the Development Plan is clear that an absolute default minimum of 10% of the site area applies in terms of open space provision. Based on a site area of 37,041sq m, the minimum open space requirement is 3,704.1sq m of open space.

A total of 22,033 sq.m of open space is provided across the site broken down as follows:

- Public open space 17,025sq.m.
- Communal Open Space 5,008sq. m

In considering the above, we note the following proposal and calculations for public open space for the entire Masterplan of 37,041 sq. m vis - a – vis Development Plan and the Apartment Guidelines standards:

DLR Standards & Apartment Guidelines Standards

The above considered, we acknowledge that the Apartment Guidelines (2020) take precedence in terms of the requirement and provision, and we set out below the requirement for the overall site.

Site Area	DLR Standards Requirement	Provision Provided
Total Site Area (37,041sqm)	10-15% of Site Area Total Communal Open Space Required = 3,704.1sqm – 5,556.15sqm	22,033sqm

Table 20 - – DLR Standards for Open Space Requirements

The proposed development will provide for significant public open space and communal open space facility offering within the development. We note specifically taking into account the specific requirements above from the apartment guidelines, as per table 5 below that this provision is over and above requirements of the relevant Development Plan and the Apartment Guidelines.

Accommodation	Requirement	Provision Proposed
1 Bed	5 sqm x 123 = 615 sqm	Total Open Space Provided 22,033sqm *
2 Bed	7 sqm x 224 = 1,568 sqm	
3 Bed	9 sqm x 13 = 117 sqm	
Total	= 2,300 sqm required	

Table 21 -Apartment Guideline Standards for Open Space Requirements

This provision is over and above the minimum requirements of the Development Plan 2022 - 2028.

Section 12.8.3.3 (ii) of the Development Plan sets out the requirements for private open space for apartment developments, relevant to the proposed development, it states as follows:

Type/No. of bedrooms	Min sq.m
1 Bed	5 sq. m
2 Bed (3 persons)	6 sq. m
2 Bed (4 persons)	7 sq. m
3 Bed	9 sq. m

Table 22 - Private Open Space Requirements as set out in the Dev Plan 2022-2028

We refer An Bord Pleanála to the Housing Quality Assessment prepared by OMP Architects for full details on private open space provision and other residential amenity requirements. Each new residential unit has an associated area of private open space in the form of a terrace/balcony. An Bord Pleanála will note that all proposals are consistent with the above requirements.

The Design Statement demonstrates that the scheme prepared for this development is founded on a strong awareness of the site context and the established landscape character. The subject site is defined by its location as a transitional zone geographically and ecologically, and it has been a guiding principle in the landscape design of the proposed development to work symbiotically with this transition. It is proposed to work with this guiding characteristic of the site in order to create a unique landscape that is in keeping with the landscape character of the area and can act to promote and facilitate biodiversity, learning opportunities and a unique, aesthetic and amenity resource for the future residents and the wider public as a whole.

The site is also a transitional zone ecologically between the lowlands of Fitzsimons Wood and the existing Oak, Holly and Birch vegetation therein and the uplands of the Dublin Mountains. The landscape design of the proposed site aims to accentuate this transition and proposes that the planting scheme will transition mid-way through the site from the lowland Oak Holly and Birch vegetation to the upland Gorse, Heather and Pine.

We trust the Board will note that a key component of the landscape design of the proposed development is to create a landscape that is of the land and landscape character of the wider receiving environment. As detailed on the enclosed drawings, the scheme uses an indigenous planting palette of hard and soft landscaping from locally sourced granite to a native Irish planting scheme.

The proposed landscape design aims to bed the built structures into the landscape allowing these built forms to be read as part of the architectural morphology of the area with a mature and verdant landscape scheme on implementation. This strategy will be achievable through rich and densely planted communal open space at podium level of the blocks providing a green gateway across the site that anchors the built forms as part of the landscape.

The communal open space landscaped areas fold into the natural topography and connect all blocks with the primary pedestrian route in the form of the Green Ribbon. This is a place making, way finding key element of the landscape design of the site which creates a unique sense of place, defines natural and amenity spaces and encourages interactions through play, fitness, rest, and education.

The distribution of built forms on the site is inspired by the Clachan settlement patterns and the landscape design proposal reflects and enhances this by creating a sustainable, liveable and local community centred around the primary landscaped heart of the development. Cultivating interaction and stimulating ownership the key aim of creating an inspiring sense of place has been achieved by a strong, deliberate and legible concept, tied together by “The Green Ribbon” creating:

- A unique sense of place and identity and a high-quality environment
- An inspiring landscape that is both multi-functional and beautiful

- A landscape the responds to the local landscape character and integrates into the wider landscape context
- A permeable landscape layout assisting the natural movement of people within and across the site
- A proposal that promotes and contributes to the wider biodiversity
- A legible hierarchy of public open space
- A design language that responds to the proposed architecture
- Total Public Open Space Provision is identified as 22,033 sq.m with the provision is broken down as follows:
 - Communal Open Space 5,008sq.m
 - Public Open Space (33% of site) 17,025 sq. m



Figure 26 - Proposed Landscape Masterplan

We note the following comment from the daylight and sunlight analysis prepared by O'Connor Sutton Cronin Consulting Engineers:

"In terms of sunlight access, excellent levels of sunlight are experienced across the proposed development. The communal amenity spaces provided exceed the BRE guidelines for sunlight on the test day of 21st of March." (Page 91)

It is important to set out that the central area of open space 16,282 sq. m receives appropriate sunlight, which is the key area of open space.

10.13 Trees

Chapter 12 of the County Development Plan 2022-2028 sets out the policies regarding Development Management of the proposed development, and section 12.8.11 refers to Existing Trees and Hedgerows, and states that:

"New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands."

As stated in the Enviroguide Landscaping report, planting has been chosen to reflect the different characters of the different spaces. Native tree shrub and herbaceous species have been specified within the development site closest to the River Slang. It is proposed to prune back the invading Cherry laurel in stages over a period of three years to allow light to penetrate to the ground layer and encourage native rases and herbaceous species to grow.

The County Development Plan 2022-2028 further states that:

"Where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planning and replacement trees and other plant material. This will be implemented by way of condition."

The proposed development has been the subject of significant Arboricultural input from the outset of the design process. The Design Team has sought to maximise opportunities for tree retention as part of the proposed development to aid in the assimilation of the scheme into its context.

In consideration of the above, the requirements of the Development Plan are met, where the retention of trees, as far as practicable, has been provided for. In addition, where it has been necessary to remove trees to facilitate development, a commensurate programme for replacement planting has been delivered.

10.14 Building Height

Appendix 5 of the Development Plan 2022-2028 contains the Building Height Strategy for the County, which has been prepared in accordance with the principles espoused in Urban Development and Building Height Guidelines for Planning Authorities, 2018 (Building Height Guidelines). Section 1.4.2 of the strategy sets out the requirements of the planning authorities to consider the policies and objectives contained in the Building Height Guidelines when making their development plans and development plans.

The Building Height Guidelines put forward both an area based and a performance criteria-driven approach as opposed to generic maximum height limits. The achievement of height is linked in the guidelines to increasing densities, although it is recognised that height does not necessarily mean higher densities.

Section 2.7 of the Building Height Guidelines calls for County Development Plans to be more *"proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building Heights, while also being mindful of the quality of development and balancing amenity and environmental considerations"*.

Section 4 of the Building Height Strategy sets out a policy approach for the assessment of building height in the County which aligns with the Section 28 Guidelines. The policy approach builds on the

principle of allowing taller buildings in town centres, district centres, **areas close to high frequency public transport** and some other areas identified as suitable for height.

At present, two Dublin Bus routes are located within 120 meters of the site entrance. The site is served by the 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station. The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance. The site's location on a quality bus corridor and within a short walking and cycling distance of a LUAS encourages increased densities that will contribute to the consolidation of Dublin City.

The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.

With high frequency and high capacity urban public transport stops within short walking distance, this proposed development site is appropriate for residential development of a higher density. The Glencairn LUAS is a 9 minute cycle from the site and 2 no. Dublin Bus stops are within 120m of the site.

- Glencairn LUAS – 1.9km / 9-minute cycle
- Sandyford Business District - 2.1km / 27 min walk
- Lamb's Cross Neighbourhood Centre – 400m east
- 44 Bus Route to City Centre & DCU – 1.2km / 14 min walk
- 47 Bus route to City Centre via UCD – 1.2km / 14 min walk.
- 44B Bus Route to Dundrum Luas Stop – 120m
- 114 Bus Route to Blackrock Dart station – 120m

The Building Height Strategy provides that there may be instances where an agreement can be made for increased height within the plan area and in those instances any such proposals would have to be assessed in accordance with any new performance criteria set out in Section 5 of the Building Heights Strategy as per SPPR3.

To ensure application of the SPPRs and having regard to the other content of the Guidelines a number of policies have been formulated in the Building Height Strategy which support increased building height and/or taller buildings at appropriate locations. Policy Objective BHS1 – Increased Heights states:

BHS 1 - It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (**i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route**) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.

The Building Height Strategy sets out the performance-based criteria that the Planning Authority will use in assessing applications for increased height in the County. There has been an additional amendment to the Performance Based Criteria below which now includes the following statement *“Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development.”*

The performance based criteria as set out in the Building Height Strategy takes into account the protection of residential amenities, the protection of the County's built and natural heritage and the promotion of compact growth in suitable locations throughout the County. The proposed development has a general shoulder height of 6 storeys, with stepped variations responding to the specific site context. This considered design approach results in heights of 1 to 3 storeys at sensitive locations to a central marker building extending to 6 storeys in the heart of the scheme. The heights proposed can be demonstrated as follows:

Table 23 – Responses to criteria in Table 5.1 of the DL RCC Development Plan 2022-2028 – Building Height Strategy

CRITERIA FOR ALL SUCH PROPOSALS	COMPLIANCE
AT COUNTY LEVEL	
<p>Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.</p>	<p>As set out in the Statement of Consistency (SOC) and Planning Report which accompanies this application the proposal secures the relevant objectives of the NPF. The proposed development of 360 no. units yield a significant density of 97.3 units. This increase in housing delivery and density are supportive of, and in alignment with the following National Policy Objectives of the NPF:</p> <ul style="list-style-type: none"> • NPO2a- A target of half of future population and employment growth will be focused in the existing five cities and their suburbs. • NPO3a – Deliver at least 40% of all new homes nationally, within the built up footprint of existing settlements. • NPO 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. • NPO5 – Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity. • NPO 35 – Increased residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area of site-based regeneration and increased building heights. <p>These NPOs seek to focus future development in existing urban environments, more efficiently using land resources and developing the critical mass required to provide public transport and local services and to sustain local businesses. They also underpin the NPF's primary National Strategic Outcome (NSO), 'compact Growth'.</p>
<p>Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport.</p>	<p>As detailed in the Planning Report and Statement of Consistency prepared by Brock McClure, and the Traffic and Transport assessment prepared by OCSC , the overall site is well served by public transport.</p> <p>Public transport stops are within short walking distance. The Glencairn LUAS is a 9 minute cycle from the site and 2 no. Dublin Bus stops are within 120m of the site. The available bus services include Dublin Bus Route 44B which operates between Dundrum Luas Stop and Ballybrack Road, Glencullen. In addition, Go-Ahead Bus operates bus route 114 in the vicinity of the subject site providing services between Rockview, Ballinteer and Blackrock Station via Sandyford and UCD Belfield.</p> <ul style="list-style-type: none"> • Glencairn LUAS – 1.9km / 9-minute cycle • Sandyford Business District - 2.1km / 27 min walk • Lamb's Cross Neighbourhood Centre – 400m east • 44 Bus Route to City Centre & DCU – 1.2km / 14 min walk • 47 Bus route to City Centre via UCD – 1.2km / 14 min walk. • 44B Bus Route to Dundrum Luas Stop – 120m • 114 Bus Route to Blackrock Dart Station - 120m

	<p>In addition, it is worth noting that the works underway on the Blackglenn Road, include a new bus priority routes which will improve the connectivity and linkages between the site and the wider area.</p> <p>These modes of transport provide direct connections throughout the city region, including the city centre, where residents can easily transfer to other routes and modes for onward connectivity.</p>
<p>Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or crossroads or public transport interchange to the benefit of the legibility, appearance or character of the area.</p>	<p>Careful consideration has been given to the successful integration of the proposal into the existing character and topography of the site and area. We note specifically that additional height is only proposed at locations where topography and existing site characteristics are favourable and in keeping within the surrounding development of the area.</p> <p>The layout and public realm elements of the development prioritise pedestrian linkages, connectivity, and amenity in order to best utilise the transport and open space amenities in the immediate facility.</p>
<p>Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground, or background. A proposal may frame an important view.</p>	<p>The proposal does not affect any strategic protected views or prospects. Residential development is considered permitted in principle under this zoning objective.</p>
<p>Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</p>	<p>Generally, with respect to water services, the Confirmation of Feasibility issued by Irish Water confirmed the feasibility of connecting to their potable water and foul water networks. Further details of the proposals are contained in OSGS Consulting Engineers' <i>Engineering Services Report</i>.</p>
<p><i>Proposed Material Amendment - Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development</i></p>	<p>A detailed Energy and Sustainability Report accompanies this application. Discussions between the client and the design team recognize the importance of creating a sustainable development which interplays between good urban design, and the most efficient use of energy and natural resources. The building services design strategy for the proposed development utilises as many sustainable design options as possible and energy efficient systems that are technically, environmentally, and economically viable for this project to achieve a low energy and environmentally friendly development.</p> <p>In relation to social and community infrastructure, the <i>Social Infrastructure Capacity Assessment including School Capacity Assessment</i> submitted with this application is of relevance. The Reports indicate the availability of adequate childcare and school places within the environs of the subject site to meet the demand generated by the development and ample provision of a broad range of services.</p>

AT DISTRICT/NEIGHBOURHOOD/STREET LEVEL	
Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.	Included in the SHD application is a combined Planning Report and Statement of Consistency which fully sets out compliance with the criteria as set out in the aforementioned guidelines.
Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.	Careful consideration has been given to ensure that a monolithic appearance is avoided within the proposal. We refer An Bord Pleanála to the O'Mahony Pike (OMP) Architects drawings and the Design Statement enclosed with this SHD application for further details.
Proposal must show use of high quality, well considered materials.	Appropriate use of materials and fenestration details as proposed by OMP Architects has ensured that the building fabric is well considered. We refer An Bord Pleanála again to the Design Statement and the Building Life Cycle report prepared by Aramark.
Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.	There is no inland waterway or marine frontage within the current proposal. We refer to the material from O'Connor Sutton Cronin (OSCS) included herewith which provides for comment on flood risk.
Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.	<p>The proposal offers significant enhancement to the local public realm by way of a new pedestrian connections, a new residential amenity area, and significantly improved frontage along Blackglen Road.</p> <p>The development takes the context of its surrounding developments into account in terms of block formation, height, and density. The layout and public realm elements of the development prioritise pedestrian linkages, connectivity, and amenity in order to best utilise the transport and open space amenities in the immediate facility.</p> <p>We also refer the Design Statement submitted by OMP for further details on matter of context, connectivity, inclusivity, public realm, adaptability, privacy and amenity, parking, and detailed design items.</p>
Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.	An appropriate mix of unit types and sizes are incorporated into the development proposal. Notably, a residential mix of 123 x 1 beds (34%), 224 x 2 beds (62%) and 13 x 3 beds (4%) is proposed. 1, 2 and 3 bedroom apartment typologies are set out in the Design Statement prepared by OMP Architects.
Proposal should provide an appropriate level of enclosure of streets or spaces.	<p>The proposed development is considered to make a positive contribution in terms of place-making again through the provision of new pedestrian connections, a new residential amenity area and significantly improved frontage along Blackglen Road.</p> <p>The main open space by virtue of its sense of enclosure and orientation creates a strong sense of place, security, and privacy for all residents of the development.</p>

<p>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>	<p>As set out by the Design Statement, careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development and local topography. The high-quality design submitted provides an appropriate transition between the neighbouring sites. The development has a general shoulder height of 6 storeys, with stepped variations responding to the specific site context. This considered design approach results in heights of 2 to 3 storeys at sensitive locations to a central marker building extending to 6 storeys in the heart of the scheme.</p> <p>The Daylight & Sunlight Assessments prepared by OCSC confirms that there are acceptable levels of access to natural daylight and sunlight. Similarly, the detailed Wind and Microclimate Study also confirms that the proposal does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.</p> <p>The proposal has been designed specifically to enhance connections to the surrounding area. Open space areas are designed to maximise on passive surveillance. An integrated development is delivered and one which enhances the presence of the natural landscape with high quality materials sympathetic to the surroundings.</p>
<p>Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>	<p>The proposed development is considered to make a positive contribution in terms of place-making again through the provision of new pedestrian connections, a new residential amenity area (Block B), a new play area, and significantly improved frontage along Glenamuck Road. The main open space by virtue of its sense of enclosure and orientation creates a strong sense of place, security, and privacy for all residents of the development.</p>
<p>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties</p>	<p>The proposed scheme presents in a series of new residential blocks which are focused on placemaking and a central area of open space. There is sufficient variety in scale and form of the Blocks through the use in variety of building layouts, sizes, and heights.</p> <p>Care has been given at height sensitive areas to ensure there is no undue impact on established levels of residential amenity adjoining the site.</p>
<p style="text-align: center;">AT SITE/BUILDING SCALE</p>	
<p>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</p>	<p>A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Design Statement by OMP.</p>
<p>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set</p>	<p>The current proposal is accompanied by a Daylight and Sunlight Analysis, which includes a detailed assessment and review of the proposed development and the possible impacts of the proposal on existing and potential neighbouring development. The Board is directed to review this report as submitted with the application.</p> <p>In addition, it confirms that there are acceptable levels of access to natural daylight and that overshadowing is minimised. In this regard, appropriate consideration has</p>

out. On relatively unconstrained sites requirements should be met.	been given to the relevant guidance documents and specifically 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 - 'Lighting for Buildings - Part 2: Code of Practice for Daylighting', 'Site Layout Planning for Daylight and Sunlight (3rd Edition) 2022.
Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.	An analysis of the impact of building height and positioning of buildings has been carried out through specific assessment criteria including sunlight and daylight access analysis, visual impact assessment and wind analysis, of which demonstrate that the design proposals are appropriately considered which have confirmed that no adverse or negative impacts arise. These assessments are submitted as part of the application.
Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.	The site is not located in or adjacent to an Architectural Conservation Area, nor does the site contain a protected structure.
COUNTY SPECIFIC CRITERIA	
Having regard to the County's outstanding architectural heritage which is located along the coast , where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.	Not Applicable to the subject site or proposed development.
Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height, and massing so as to avoid being obtrusive.	The proposal responds to the surrounding context in the form of an appropriate transition in scale away from where the boundaries either adjoin or are adjacent to existing residential development. The proposed buildings will respond (in their setback from the boundaries, their height and steps in the massing) to the particular conditions and degree of sensitivity of the adjacent lands. At a maximum height of 6 storey's the proposal will not be obtrusive and of a scale that would negatively impact on the quality and amenity value of the County's 'high quality mountain foothill landscape'.
Additional specific requirements (Applications are advised that requirement for same should be teased out at preplanning's stage).	A formal pre-planning meeting was held to discuss the proposal in principle with DLRCC, furthermore a formal Strategic Housing Development pre-application meeting was held with An Bord Pleanála and any request following their opinion is included in the 'Response to Opinion' documents which accompanies this application.
Specific assessments such as assessment of microclimatic impacts such as down draft.	We refer An Bord Pleanála to the enclosed Wind Report prepared by OCSC which examines in detail the impacts of proposed development in terms of Wind and Microclimate.
Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.	This SHD application is accompanied by an AA Screening Report prepared by Enviroguide, which demonstrates that the proposed building height does not have any potential to adversely impact on the biodiversity of the area. As outlined in the AA Screening, the development is not located within any European Site and therefore there will be no loss or alteration of habitat as a result of the proposed development.

Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.	Given the height and scale of the development proposed, it is not anticipated that the proposal will interfere with important telecommunications channels such as microwave links. A Telecommunications Report prepared by ISM accompanies this application and their findings concluded that no Microwave Transmissions links would be impacted by the height and scale of the development. In addition, the assessment also did not identify any Radio Frequency links that would be impacted also.
An assessment that the proposal maintains safe air navigation.	In preparation of this planning application, the applicant has entered into discussions with the IAA who had no significant comment to make on the proposal. As identified in the appendix to the rear of this report, the IAA in their review dated 8 th August 22 concluded that: <i>“ I wish to advise that we have no observations on this application from the Safety Regulation Division Aerodromes”.</i>
Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.	An Appropriate Assessment Screening Report and an Ecological Impact Assessment Screening Report has been prepared and submitted by Enviroguide. They ultimately conclude that there is no reason for the development not to proceed on key ecological and environmental grounds.
Additional criteria for larger redevelopment sites with taller buildings	Not applicable
Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.	The proposed development is considered to make a positive contribution in terms of place-making again through the provision of new pedestrian connections, a new residential amenity area, and an improved frontage along Blackglen Road. The main open space by virtue of its sense of enclosure and orientation creates a strong sense of place, security and privacy for all residents of the development. The proposed scheme presents in a series of new residential blocks which are focused on placemaking and a central area of open space. There is sufficient variety in scale and form of the Blocks through the use in variety of building layouts, sizes and heights. Care has been given at height sensitive areas to ensure there is no undue impact on established levels of residential amenity adjoining the site
For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.	We refer the board to the accompanying Daylight and Sunlight assessment prepared by OCSC submitted with this application. The subject site is not considered to be unconstrained, therefore, this criterion does not apply to the development. However, An Bord Pleanála is redirected to the response in relation to daylight and sunlight above.

Informed by the responses provided to the criteria above (which are set out in Table 5.1 of the Development Plan’s Height Strategy), it is considered that the proposed development complies and is consistent with Policy Objective PHP42 (Building Design & Height) of the Development Plan:

“It is a Policy Objective to:

- Encourage high quality design of all new development.
- Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”

Given the proposed development's compliance with Policy Objective BHS 3 which allows an assessment of increased height to be provided, the height of up to just 6 No. storeys is considered to be appropriate and a progressive means through which to secure additional, sustainable housing delivery.

Furthermore, the design has sought to respect existing and proposed residences, preventing overlooking, overbearing and overshadowing. Therefore, permitting the proposed development will be in accordance with proper planning and sustainable development and a strong rationale for increased building height has been provided above in response to Table 5.1 of Appendix of the Development Plan. Therefore, we consider that the proposed heights are in accordance with Table 5.1 of the Development Plan however this has been included in the Material Contravention Statement on a precautionary basis, if An Bord Pleanála do not agree.

General Principles

In addition to the consideration given to upward and downward modifiers as they relate to the site, it is our submission the General Principles section contained in Section 5 of the Strategy also support increased height at this location.

The general principles, should be applied by the competent authority in assessing appropriate building heights throughout the County. The general principles referenced are set out below:

- To protect the residential amenities of the County.
- To protect the County's built heritage and natural areas of exceptional beauty.
- To promote high densities and allow for increased densities around public transport nodes and centres of activity.
- To encourage higher densities and also to allow for increased building heights at appropriate locations along public corridors.
- To promote high density through in-fill development.
- To allow for landmark buildings in the right places.

It is our submission that the current proposal:

- Will protect existing levels of residential amenity in the area, as demonstrated in the material enclosed herewith from OMP Architects and IAC's Architectural Consultants. Specifically, we note that the OMP ABP Design Statement has addressed in detail all residential amenity considerations associated with proposals for height. In addition, it is the finding of IAC's analysis that any impacts on daylight access to nearby existing buildings are likely to be minor and that the proposed development will have no undue adverse impact on daylight access within buildings in the wider area surrounding the application site.
- With the exception of the proposed site being located at the foothills of the Dublin Mountains, the development does not impact on the County's built heritage and natural areas of exception beauty, given the significant removal of the site from such locations. Notably, and more importantly, the site is not located in or adjacent to an Architectural Conservation Area, nor does the site contain a protected structure.
- Promotes an appropriate level of infill residential density to allow for increased densities along the Blackglen Road i.e., an overall masterplan residential density of 97.3 units per ha is proposed. This principle of development is supported in national policy and the site is considered a unique opportunity to deliver appropriate building heights and residential densities.

It is having considered the policy approach on height; the general principles that are applied when considering new proposals for development; and the existing permitted context along the Blackglen Road that we consider the proposal submitted herewith to be acceptable in terms of building height.

We note specifically that this combined Planning Report and Statement of Consistency has also set out the consistency of the development proposal with the performance criteria of the Building Height Guidelines, which is the prevailing context for height in this case. It is submitted that there is a sufficient policy context to grant permission for the proposed development in line with the compliance of the scheme vis a vis SPPR 3A.

10.15 Car Parking

A total of 419 car parking spaces, are proposed to serve the development.

Section 12.4.5 of the Dún Laoghaire-Rathdown County Development Plan, 2022-2028 prescribes minimum standards for the quantum of car-parking spaces that are to be provided in new developments. The principal objective of the application of car parking standards is to ensure that, in assessing development proposals, appropriate consideration is given to the accommodation of vehicles attracted to the site within the context of Smarter Travel, the Government policy aimed at promoting modal shift to more sustainable forms of transport.

The Council's car parking standards have also been informed by the National Planning Framework. The National Planning Framework requires a stronger focus by Planning Authorities on consolidating growth within existing built up areas, strengthening our urban centres and improving public transport, permeability, and accessibility.

Section 12.4.5.1 of the Development Plan has broken the County into four Parking Zones, reflecting the varying degrees to which these criteria are generally met. The four parking zones are defined as:

- Parking Zone 1: Comprises the Major Town Centre areas of Dún Laoghaire and Dundrum together with the Blackrock District Centre area;
- Parking Zone 2: This zone generally includes areas, which are within specified walking bands/catchments;
- Parking Zone 3: This zone generally comprises the remainder of the County, excluding rural areas;
- Parking Zone 4: This zone comprises the rural areas within the County.

In addition, as part of the development plan, a supplementary map is provided (Map T2) which shows the Parking Zones. From this map, it is shown that the development will be located within Zone 3.

Table 12.6 of the Development Plan sets out the following car parking standards for residential apartments for each zone.

Land Use	Zone 3 Remainder of County (non-rural)
Houses:	Standard
House 1 bed	1
House 2 bed	1
House 3 bed or more	2
Apartments and Sheltered Housing:	
Apt 1 bed	1*
Apt 2 bed	1*
Apt 3 bed +	2*
*plus 1 in 10 visitor parking for apartments in zone 3	
Childcare	1 per 40
Community facility, library, museum, art gallery	1 per 50

Extract from Table 12.6 Car Parking Zones and Standards from the DCP 2022-2028

When the above standards are applied to the proposed development, a total of 409 spaces are required for the residential proposal. It is noted that these parking standards represent a maximum. Please see car parking spaces calculations below which shows that the proposed development complies with the requirements of the current CDP.

Apartments:

- 1 space per 1 bed units (123 x 1 = 123)
- 1 space per 2 bed units (224 x 1 = 224)
- 2 spaces per 3-bed units (13 x 2 = 26)

Based on these requirements, a total of 373 spaces are required. In addition, a further 36 no. spaces are required for visitor parking bringing the total residential parking requirement to 409 no. spaces. Furthermore, there is a requirement of 1 parking space per 40sqm for the creche, which equates to a further 10 no. car parking spaces for this aspect. Thus to be in line with the current development plan standards a total of 419 no. car parking spaces would be required for the proposed development.

The Development Plan also gives guidance on the number of motorcycle parking spaces required. The document stipulates a minimum of four or more spaces per 100 car parking spaces. Since there is a requirement of 419 no. car parking spaces, this equates to a minimum requirement of **17 no. motorcycle parking spaces**, the proposal provides for 19 no. spaces.

Finally, there is also a requirement to provide one car parking space per five car parking spaces to be equipped with one fully functional EV Charing Point. The development will provide a total of 80 no. spaces with EV functionality to meet this requirement.

10.16 Cycle Parking

Section 12.4.6 of the Development Plan set out the standards for cycle parking and accords with the 'Standards for Cycle Parking and Associated Cycling Facilities for New Development' (2018). It is a requirement that, new residential developments of 5 residential units or more or non-residential type developments of 400 sq. m. or over, submit a Cycle Audit as part of the planning application. The Cycle Audit must be prepared by a suitably qualified person and shall clearly demonstrate, in plan format, how all the requirements of Council's Standards for Cycle Parking and Associated Cycling Facilities for New Developments, are met within the development.

These standards require the following provision for residential use:

- Long Stay: 1 space per unit ($360 * 1 \text{ space per unit} = 360$)
- Short Stay: 1 space per 5 units ($360 * 1.5 \text{ space per unit} = 72$)

According to the parking standards a total of 432 no. cycle spaces are required to comply with the Development Plan.

The Dun Laoghaire Rathdown Standards for 'Cycle Parking and associated Cycling Facilities for New Developments (January 2018)' require the following provision for residential use:

- Long Stay: 1 space per unit.
- Short Stay: 1 space per 5 units

As the proposal is for 360 units, therefore 432 no. spaces are required under the DLR standards.

The provision of bicycle parking spaces is set out in the below table.

Type	DLRCC Requirements	Apartment Guidelines	Parking Provided	Parking Ratio
Long Stay	1 long stay parking space per 1 unit	Min. of 1 parking space per bedroom	970	1: 2.69
Short Stay (Visitor)	1 short stay (visitor) parking space per 5 units	1 space per 2 residential units		

Table 24 - Bicycle Parking

The provided cycle parking exceeds the requirements of both the Apartment Guidelines and the latest DLR County Development Plan 2022 – 2028.

Safe and secure long-term parking will be provided for residents, while the short term parking will be provided in the form of Sheffield stands.

This Statement of Consistency and Planning Report has identified the compliance of the scheme with relevant strategic and statutory planning policy documentation, and we trust that the Board will now accept that the key objectives of each of the documents cited in this report have been met.

We direct the attention of the Board to other material submitted herewith for further detail on the context of the site and a clear and concise development description.

We invite the Board to consider the proposal now in front of them. We note the following key summary points:

- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g., NPF, Rebuilding Ireland and RSES) and we ask that An Bord Pleanála have regard to this in their consideration of the proposal.
- It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this under utilised, residential zoned site, while responding sensitively to the features and constraints associated with the subject site, including adjoining properties.
- The site is zoned Objective A *“To protect and/or improve residential amenity”* which explicitly provides for residential development. The proposed use ‘residential’ is acceptable in principle at this site and under this zoning.
- The site is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- This Planning Report and Statement of Consistency, accompanying this planning application demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and proper planning and sustainable development of the area.
- The current proposal maintains all established development parameters in terms of design layout and orientation of buildings and separation distances to adjoining development.

We ask that the Board consider these points in their review of proposals and we trust that they will view this planning application as a positive move towards delivery of sustainable development on zoned lands.

Irish Aviation Authority
The Times Building
11-12 D'Olier Street
Dublin 2, D02 T449,
Ireland

Údarás Eitíochta na hÉireann
Foirgneamh na hAmanna
11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449,
Éire

T: +353 1 671 8655
F: +353 1 679 2934
www.iaa.ie



8th August 2022

Attn: Ms Kathy McNally
Brock McClure
Planning & Development Consultants
63 York Road
Dun Laoghaire
Co Dublin

Ref: Proposed SHD Development at Blackglen Road Sandyford D18
Applicant: Zolbury Ltd

Description: The proposed development consists of 9 no. blocks (A1, A2, B1, B2, B3, B4, C1, C2 and C3) ranging in height from 2 and 6 storeys. Blackglen Road, Sandyford, Dublin 18.

Dear Sir / Madam

I refer to the request for planning permission for the above development, details of which were received by the Irish Aviation Authority by email dated 29th July 2022.

I wish to advise that we have no observations on this application from the Safety Regulation Division, Aerodromes.

Yours sincerely

Deirdre Forrest
Corporate Affairs

Bord Stiúrthóirí/Board of Directors
Peter Kearney (Príomhthéidhneannach/Chief Executive)
Cian Blackwell, Marie Bradley, Ernie Donnelly,
Gerry Lumsden, Joan McGrath, Diarmuid Ó Conghaile,
Eimer O'Rourke

Oifig Chláraithe:
Foirgneamh na hAmanna, 11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449, Éire
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire
Cuideachta Dlíteanais Theoranta

Registered Office:
The Times Building, 11-12 D'Olier Street
Dublin 2, D02 T449, Ireland
Registered No. 211082. Registered in Ireland
A Limited Liability Company