



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

PLANNING REPORT

PROPOSED PART 8 RESIDENTIAL DEVELOPMENT

Mount Saint Mary's, Dundrum Road, Dundrum, Dublin 14

MARCH 2025

PREPARED ON BEHALF OF:
Dún Laoghaire-Rathdown Council

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Table of Contents

1.0 Introduction..... 3

2.0 Site Location and Description..... 4

3.0 Planning History..... 5

 3.1 Subject Site 5

 3.2 Surrounding Area..... 15

4.0 Proposed Development..... 16

5.0 Response to Request for Information from Dún Laoghaire-Rathdown County Council 24

6.0 National and Regional Planning Policy Context 41

 6.1 Project Ireland 2040 – National Planning Framework (2018) 41

 6.2 Project Ireland 2040 - National Development Plan..... 42

 6.3 Housing For All – A New Housing Plan for Ireland..... 42

 6.4 Regional Spatial and Economic Strategy for the Eastern and Midland Region, June 2019..... 43

 6.5 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)..... 44

 6.6 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)..... 48

 6.7 Urban Development and Building Height Guidelines (December 2018)..... 51

 6.8 The Planning System and Flood Risk Management: Guidelines for Planning Authorities . 55

 6.9 Childcare Facilities: Guidelines for Planning Authorities..... 56

7.0 Local Planning Policy Context 58

 7.1 Dún Laoghaire County Development Plan 2022-2028 58

 7.1.1 Zoning Objective 58

 7.1.2 Density 62

 7.1.3 Infill Development..... 64

 7.1.4 Appearance and Character of the Area..... 64

 7.1.5 Private Open Space 65

 7.1.6 Communal Open Space 66

 7.1.7 Public Open Space..... 67

 7.1.8 Parking Standards..... 67

 7.1.9 Protected Structures..... 72

 7.1.10 Housing Needs Demand Assessment..... 73

8.0 Appropriate Assessment and Environmental Impact Assessment 82

9.0 Daylight and Sunlight 83

10.0 Engineering..... 84

 10.1 Foul Drainage..... 84

 10.2 Water Supply 84

 10.3 Surface Water Drainage..... 84

11.0 Conclusion..... 85

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Planning Report on behalf of Dún Laoghaire-Rathdown County Council for a proposed development comprising the construction of 129 no. residential units consisting of 72 no. one-beds, 23 no. two bed (3-person) and 34 no. two-bed (4-person) units in 3 no. blocks. The proposed development has been prepared and submitted in accordance with Part 8 of the Planning and Development Act 2000 (as amended) (herein referred to as ‘the Act’) which is a ‘temporary exemption for local authorities from the ‘Part 8’ approval process to construct housing developments on local authority and designated State owned lands zoned to include residential use... and specifies exempted development status for the provision of specified forms of housing development on designated State lands’.

The purpose of this report is to provide a comprehensive assessment of the development against all relevant documents which guide development, inclusive of local and national planning guidance which ensures proper planning and sustainable development. The wider design team has been appointed to prepare a variety of documents to ensure the preparation of a high-quality residential development on behalf of Dún Laoghaire-Rathdown County Council. Details of the design team are included below in Table 1.0 of this report.

Design Team Member	Documentation Provided
Reddy Architecture	Architecture Drawings, Schedule of Accommodation, Housing Quality Assessment, Architectural Design Statement, Universal Design Statement and Building Lifecycle Report
TENT Engineering	Engineering Drawings, Engineering Services Report, Flood Risk Assessment, Traffic and Transport Assessment, Mobility Management Plan, DMURS Compliance Statement, Road Safety Audit, Walking and Cycling Quality Audit, Cycle Parking Management Plan, Public Transport Capacity Assessment Report, Construction Management Plan, Construction Environmental Management Plan and Climate Action and Energy Statement
3D Design Bureau	CGIs, Photomontages and Daylight, Sunlight and Overshadowing Assessment
Ronan MacDiarmada Landscape Architects	Landscape Drawings and Landscape Design Report
CMK Hort and ARB	Tree Survey and Arboricultural Impact Assessment
Fallon Design Consulting Engineers	Public Lighting Layout and Plant Design Drawings and Report
Open Field	AA Screening Report and EclA
Altemar Environmental Consultants	Bat Fauna Impact Assessment
Chris Ryan	Architectural Heritage Impact Assessment
AWN	OWMP & EIA Screening

Table 1.0 Design team and associated documents provided.

This planning report was prepared on behalf of Dún Laoghaire-Rathdown County Council to accompany a Part 8 proposal for the development of 129 no. residential units on a gross site of circa c. 0.98263 hectares in area, located in Dundrum, Dublin 14.

In addition to describing the proposed development and the site and surrounding area, this report outlines how the development conforms with local, regional, and national policies.

1.1 Compliance with Part 8

Development by, on behalf of, or in collaboration with the Local Authority is covered under Part XI of the Planning and Development Act 2000 as amended and the procedures outlined in Part 8 of the Planning and Development Regulations 2001 as amended. A Local Authority may carry out specified development or a type of development under Section 179 of the Planning and Development Act 2000, as amended, subject to compliance with the requirements of that section of the act. The proposed development will increase the quantity of social housing and is supported as a delivery mechanism in 'Housing for All'.

The local authority may remain the landlord on commencement of construction and is responsible for nominating tenants or purchasers from the local authority social housing waiting list, based on the local authority's allocation scheme.

The subject site proposes the development of 129 no. residential units consisting of 72 no. one-beds, 23 no. two-bed (three-person) and 34 no. two-bed (four-person) units.

2.0 Site Location and Description

The subject site comprises c. 0.98263 ha and is situated to the east of Dundrum Road. The site is situated to the south of Mount St. Mary's, to the west of the Churchfields residential development and to the north of the CUS Rugby Grounds. The area is characterised by a variety of housing typologies inclusive of single, two and three-storey dwellings, apartments, semi-detached and terraced dwellings. The immediate area comprises largely residential, however, the wider surrounding area comprises a variety of amenities and services inclusive of education, sports facilities, playground, religious, retail, restaurants and cafés.

The site is considered to be well-served by public transport. Along Dundrum Road, Dublin Bus Route Nos. 44/D, 142 and Go Ahead Route No. S4 provides a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Liffey Valley, Malahide, Sandyford and UCD. Additionally, the site is within a 13-minute walk of the Milltown Luas Stop providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge.



Figure 1.0 Aerial image of the subject site (red outline).



Figure 2.0 Wider locational context of the subject site (red outline).

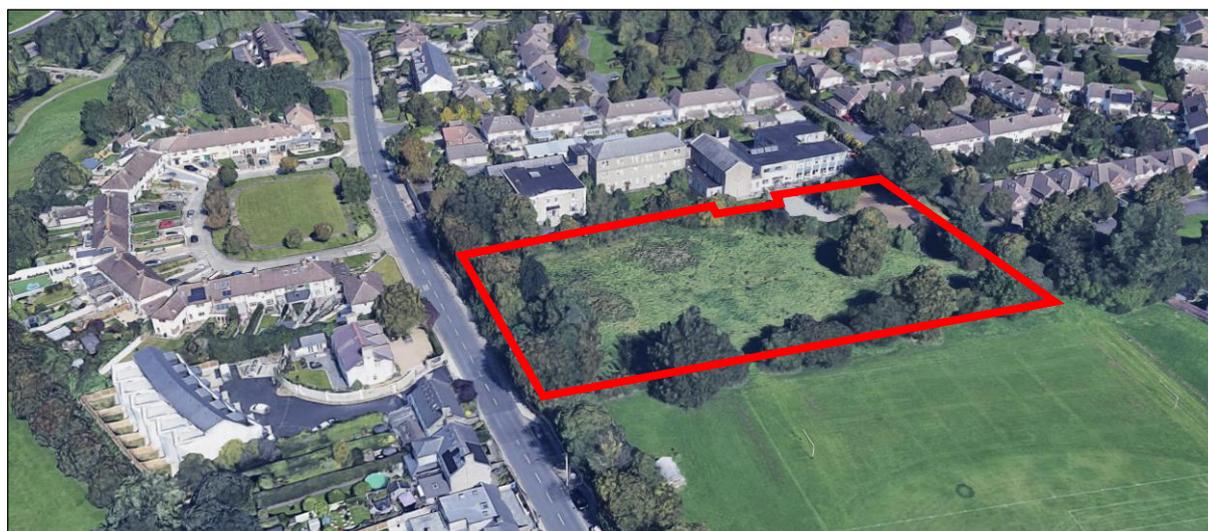


Figure 3.0 3D image of the subject site (red outline).

3.0 Planning History

3.1 Subject Site

A review of the Dún Laoghaire-Rathdown County Council and An Bord Pleanála online planning registers revealed the following planning applications pertaining to the subject site.

ABP Ref. 310138 Planning permission granted by An Bord Pleanála on 25th August 2021 for the construction of a Strategic Housing Development comprising 191 no. apartment units, childcare facility and café.

As per the grant of permission, we refer to the following conditions which alter the development from that as originally sought.

Condition No.2 *The proposed development shall be amended as follows:*
 a) *Block (Villa) A shall be omitted and the area shall be incorporated into public open space. Revised plans and particulars showing compliance with this requirement shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.*

- b) *Details of the pedestrian and cyclist access on the eastern boundary of the site with Churchfields shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. In default of agreement the matters) in dispute shall be referred to An Bord Pleanála for determination.*

Reason: *In the interests of visual and residential amenity and pedestrian and cyclist and traffic safety.*

Condition No.3 *The grant of planning permission permits 191 number apartment units.*

Reason: *In the interest of clarity.*

The development granted under ABP Ref. 310138 would have seen the construction of 191 no. units in 4 no. blocks ranging in heights from 4-10 storeys. The development would have resulted in a unit density of c. 119 no. units per hectare. With regard to density, we note the following included in the Inspector's Report:

*'The Sustainable Residential Development in Urban Areas Guidelines (2009) promote minimum net densities of 50 units per hectare within public transport corridors (500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station) with no upper limit. The Apartment Guidelines defines locations in cities and towns that are suitable for increased densities, with a focus on the accessibility of the site by public transport and proximity to city/town/local centres or employment locations. The guidelines state that 'central and / or accessible' urban locations are generally suitable for small to large scale and higher density development that may wholly comprise apartments. The guidelines note that the scale and extent of development should increase in relation to proximity to core urban centres and public transport as well as employment locations and urban amenities. **In my opinion national policy would support higher densities on this particular site.***

Further to this, we would also note the following:

*'The planning authority state in their CE Report that while they are not opposed to higher density in principle, they do have concerns regarding the current proposal given that the open character of the lands is not retained and the fact that the proposed density is on a site abutting 2-storey housing and in a transitional zoning area with an 'INST' designation. As a result, the proposed density is an indication of overdevelopment. These same concerns are also highlighted in several third-party submissions. Section 2.1.3.5 of the operative CDP and Policy RES5 Institutional Lands allows for densities higher than 35-50 units/ha in circumstances where the open character of the lands is being retained. As stated in Sections 11.5.7 to 11.5.18 above **I would consider the proposal has demonstrated compliance with the requirements outlined in the operative CDP in this regard, therefore I consider the density proposed on these lands with 'INST' designation appropriate both under the operative CDP and also national policy.***

A number of concerns regarding the density and height of the development were raised due to the proximity of the taller buildings with regard to the existing two-storey dwellings which adjoin the site. Despite this, however, we would note that An Bord Pleanála had considered the density suitable for the subject site, subject to the conditions attached to the order to grant permission which reduced the number of units to 191 no. units, resulting in a unit density of 119 no. units per hectare. The Inspector's Report makes reference to The Sustainable Residential Development in Urban Areas Guidelines (2009) as justification for increased densities at the site which would contravene guidance as set out in the Development Plan. We would note that this document has since been replaced by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) document. In this regard, a density of 131 no. units per hectare is considered appropriate for the site due to the locational context and availability of public transport.

Furthermore, while it is considered that the proposed development aligns with guidance set out in the Compact Settlements Guidelines, we also consider the proposal in the context of the Development Plan which provides guidance for the development of sites with an 'INST' objective. As such, the development of the design has considered this guidance and provides for a development which protects

the open space character of the site through the provision of an extensive quantum of public open space. This will be discussed in Section 4.0 of this report.

With regard to the receiving context of the site, with particular regard for the residents of the two-storey dwellings which adjoin the site to the east at Churchfields, the layout of the development has considered this, and it is noted that Block C is situated to the east of the site, with a height of two-storeys. As such, this provides for a significant increase in separation distances from the taller element of the site from the surrounding area, protecting existing residential and visual amenities, than that as previously granted on-site under ABP Ref. 310138.



Figure 4.0 Site plan of the development submitted under ABP Ref. 310138 with block A to be omitted as per condition no. 2 (a) outlined in blue.



Figure 5.0 Northern contextual elevation of the development submitted under ABP Ref. 310138 with block A to be omitted as per condition no. 2 (a) outlined in blue.



Figure 6.0 Eastern contextual elevation of the development submitted under ABP Ref. 310138.



Figure 7.0 Southern contextual elevation of the development submitted under ABP Ref. 310138.



Figure 8.0 Western contextual elevation of the development submitted under ABP Ref. 310138.

While the Board had considered the proposal acceptable for the subject site, the order to grant permission was challenged by way of Judicial Review under Sections 50, 50A and 50B of the Act of Record No. 2021/874JR. The Judicial Review proceedings set out 10 no. Core Legal Grounds, each of which will be summarised and a response provided below and overleaf:

Core Ground 1

The development had not demonstrated that there was no demand for an alternative use on site.

Response

The previously proposed development sought planning permission for the construction of a mixed-use development comprising residential, childcare and a café. The subject lands, while zoned objective ‘A’ which permits residential development have an INST designation with the objective ‘to protect and/or provide for Institutional Use in open lands’. In this regard, we refer to the following commentary included in the Inspector’s Report:

*'I note that the planning authority in their submission acknowledge that the CUS is under the Trusteeship of the Marist Fathers and one would defer therefore that **the CUS would have been aware of the sale of the lands and planning application on site and would have expressed an interest in same if one existed.** I also note that a submission on the application was received from the **Joint Managerial Body Secretariat of Secondary Schools, the occupiers of Robert Emmet House, who mentioned nothing in their submission about their desire to expand their services on the adjoining site in the future or indeed any demand for same.**'*

'The applicant states that the lands to the south of the subject site are used solely for sports facilities and that the CUS main buildings are located on Lower Lesson Street in Dublin 2. In addition, I note that the applicant has stated that CUS, has no legal interest in the subject lands. I believe that if either of these bodies had an interest in the lands that they would have raised this as a matter prior to this stage or at the very least in a submission on the planning application. Therefore, having taken account of all the above I see no obvious demand for an alternative institutional use on the subject site and in accordance with Section 8.2.3.4 (xi) consider that alternative uses subject to the area's zoning objective may be permitted.'

Further to this, the Inspector's Report notes the previous owners of the site sold the site to the previous applicants as a result of having no demand to continue using the site:

'The applicant in both their Statement of Consistency and Statement of Response to the ABP Opinion state that the subject site was formerly in the ownership of the Marist Fathers, who sold the site to the applicant as a result of having no demand to continue using the site.'

In this regard, it is considered that there is clear evidence there is no demand for an alternative use on the subject lands. We would also refer to Section 4.3.1.4 of the Development Plan which states '*where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the zoning objectives of the area being adhered to and the open character and recreational value of the lands being retained*'. In this regard, it is considered that the proposal to provide 129 no. dwellings on the subject site, and the associated high quantum of open space and consideration of the existing open character of the site represented in the proposed layout, demonstrates compliance with the site's zoning designation and guidance provided in the Development Plan as it is considered that there is no demand for an alternative institutional use.

The Development Plan sets out additional guidance for lands with an INST objective, these are outlined in Section 6.0 of this report and compliance with this is demonstrated.

Core Ground 2

The previously proposed development would contravene the Development Plan with regard to open space requirements on lands with an INST objective, particularly Section 8.2.3.4 (xi) of the 2016-2022 Development Plan. The development would also contravene Development Plan guidance as a masterplan prepared and submitted with the application did not consider the CUS lands to the south.

Response

We note that under the Dún Laoghaire-Rathdown County Development Plan 2016-2022, Section 8.2.3.4 (xi) notes that '*a minimum open space provision of 25% of the total site area **(or a population based provision in accordance with Section 8.2.8.2 whichever is the greater)** will be required on Institutional Lands*'. With regard to the current Development Plan, we would note the following guidance with regard to the provision of open space:

'at A minimum of 25% of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space.'

We would note that the element of this guidance with regard to the provision of open space based on population has been omitted from the guidance set out in the current Development Plan. As such, we would note that the proposed development which provides 2616 sq.m open space, equivalent to 26.6% of the site area is compliant with the Development Plan.



Figure 9.0 Open space designation.

Additionally, with regard to the preparation of a masterplan ensuring compliance with Development Plan guidance, we refer to the masterplan drawing prepared by Reddy Architecture and Urbanism submitted with this Planning Report which considers a masterplan for the site. With regard to lands to the south of the site, we would note that Objective F zoning with the objective *‘to preserve and provide for open space with ancillary active recreational amenities’*. As such, it is not considered that the lands to the south should be developed further at this time and we would note that the lands are currently used as the CUS Rugby Grounds and, therefore, have an existing land use which accurately reflects the site’s zoning. As such, it is not considered that a masterplan is required for these lands as the existing land use provides for open space with active recreational amenities in keeping with the zoning objective.

Additionally, we would refer to the following included in the Inspector’s Report for the previously approved SHD on the site with regard to the masterplan prepared which did not include the CUS lands to the south:

*‘The applicant in their Statement of Consistency outlines that they have no control over the adjoining lands, namely the sports fields at CUS and also that the ‘INST’ designation does not extend to this site to the south. They therefore did not consider it appropriate to include these lands as part of the masterplan. I note from an examination of the relevant zoning Map 1 of the operative CDP that the ‘INST’ Specific Local Objective ‘stamp’ is in fact completely located on the subject site which has a Use Zoning Objective “A” and does not extend onto the Use Zoning Objective “F” lands to the south. In addition, I note from an examination of other “INST” designations in the area that these too are located on Use Zoning Objective “A” lands, all of which relate to residential lands. **The planning authority does not explicitly state whether the CUS lands would be considered to be covered by the INST designation, but they do state that the exclusion of same lands from the masterplan would result in an uncomprehensive masterplan.***

*‘From an examination of Section 8.2.3.4 (xi) I note that a masterplan must adequately take account of the built heritage and natural assets of a site and established recreational use patterns. **I would consider the submitted masterplan has adequately addressed these matters** and is informed by the other documents and assessments which form part of the*

application which include the Architectural Heritage Impact Assessment, the Arboricultural Impact Assessment, the Landscape Masterplan and the three environmental assessments submitted, namely the EIA Screening Report, the AA Screening Report and the EclA. I therefore consider that the masterplan adequately addresses the built heritage and natural assets on site'.

'While I acknowledge the planning authority's concerns and the concerns raised by third parties in relation to the exclusion of the CUS grounds from the overall Masterplan, I believe that the applicant has provided sufficient provision for future links to these lands'.

'To conclude this point, I do not consider that the exclusion of the CUS lands to the south of the subject site from the masterplan would constitute a material contravention of the operative CDP. The submitted masterplan in my opinion has adequately taken account of the built heritage and the natural assets of the site, as well as any established recreational use patterns. Public access has also been taken into account'.

We would consider that the masterplan prepared for the proposed development which includes a potential layout for the lands to the north, demonstrates compliance with the Development Plan, having regard for the commentary included in the Inspector's Report of the previously proposed development at the site. We would highlight that the INST objective is situated on the subject lands which are zoned objective A and do not extend to the lands to the south with an objective F zoning objective. In this regard, it is considered that the omission of a masterplan of these lands is acceptable with regard to Development Plan guidance.

We would also note that similarly to the previously proposed development, an Architectural Heritage Impact Assessment, Arboricultural Reports, Landscape Masterplan and EIA Screening Report, AA Screening Report and EclA have been prepared. The information provided in these reports would not be available with a masterplan and it is therefore considered that these reports provide the level of detail to address the built heritage and natural assets on the site, providing more detail than a masterplan. In this instance, it is considered that the masterplan prepared for the proposed development which considers the lands to the north and excludes the CUS Rugby Grounds lands to the south, is suitable and does not constitute a material contravention of the Development Plan. The masterplan and associated documents prepared to support the proposed development adequately take account of the built heritage and natural assets of the site as well as public access, as we note that the layout of the site allows for future connections to neighbouring sites.



Figure 10.0 Masterplan of the proposed development and the site to the north.

Core Ground 3

The Board failed to have regard for the Sustainable Residential Development in Urban Areas Guidelines 2009 and the objectives of the Development Plan with regard to density on lands with an INST objective.

Response

Section 4.3.1.4 of the Development Plan notes that for lands with an INST objective, ‘average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands’. The proposed development provides for a density of 131 no. units per hectare. This is considered appropriate for the subject site, given the availability of transport connections and proximity to various amenities and services.

While we note that the Judicial Review proceedings refer to the Sustainable Residential Development in Urban Areas Guidelines 2009, these have since been replaced by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) which seeks to provide higher density development on well-served sites. Due to the locational context of the site, unit densities of up to 150 no. units per hectare are considered suitable. As the proposal results in a density of 131 units per hectare, it is considered that the proposal is compliant with this guidance. This is set out further in Section 5.0 of this report.

Regarding Development Plan guidance, it is considered that the proposed density has demonstrated a contribution towards the objective of retaining the open character of the lands. This is evidenced by the site layout plan prepared by Reddy Architecture and Urbanism, where it is proposed to retain a significant amount of open space on site. We would highlight the proposed open space situated to the north of the site which adjoins the site of Mount Saint Mary’s. It is considered that the setbacks from the neighbouring structure to the north and residential dwellings to the east and west of the site ensure the protection of the open character of the lands as massing and visual impacts on the surrounding area are minimised. This guidance also refers to the recreational amenities of lands which should be considered, however, as there are no recreational amenities of the subject lands, this is not considered to be applicable.

Core Ground 4

The previously proposed development was considered to represent a material contravention of the objective to preserve trees and woodlands on the site.

Response

Under the Dún Laoghaire-Rathdown County Development Plan 2016-2022, there was an objective to the east of the site to preserve trees and woodlands, however, under the current Development Plan, we would note that no such objective is present on site. While this protection is no longer present on site, efforts have been made throughout the design process of the development to ensure the protection of existing trees on site. We refer to the arborist documents prepared by CMK Hort & Arb Ltd. which detail the trees on site proposed for retention, and the landscape plans prepared by RMDA Landscape Architects + Consultants which provide details of the landscape strategy for the site which will ensure the proposal protects and contributes to the visual amenity of the area.



Figure 11.0 Extract of the Tree Impact Assessment drawing prepared by CMK Hort & Arb Ltd.

Core Ground 5

The previously proposed development was considered to contravene Article 297(2)(a) of the Planning and Development Regulations 2001 as no letter of consent had been provided for works to the mouth of the gateway which links into the Churchfields Estate to the east.

Response

For clarity, Article 297(2)(a) states *'where the applicant is not the owner of the land concerned, the written consent of the owner to make an application under section 4 of the Act of 2016 in respect of that land'*. The proposed development will provide a link from the subject site to Churchfields Estate, however, there are no works proposed to the mouth of the gateway. In this regard, there are no works proposed which would require a letter of consent as there are no works proposed outside the ownership of the site. Notwithstanding this, it has been clearly demonstrated that there is a clear right of way in place.

Core Ground 6

The previously proposed development was considered to contravene Article 299B(1)(b)(ii)(II)(c) of the Planning and Development Regulations 2001 as the Board had not been provided with the necessary documents to properly assess the development.

Response

For clarity, Article 299 (1) (b) states *'(i) The Board shall carry out a preliminary examination of, at the least, the nature, size or location of the development'* and Article 299 (1) (b) (ii)(II)(c) states *'(C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account'*. In this regard, an EIA Screening Report has been prepared by Altemar Environmental Consultants. The details of this report are set out further in Section 7.0 of this report.

Core Ground 7

The Board had not conducted the required preliminary EIA Screening exercise as required.

Response

With regard to the proposed development, we would highlight that it is the responsibility on Dún Laoghaire-Rathdown County Council to complete an EIA Screening exercise to identify where and Environmental Impact Assessment Report (EIAR) is required. We would refer to the EIA Screening report prepared by AWN Consulting Limited which considers that the preparation of an EIAR would not be required in this instance as there is no likelihood of significant effects on the environment from the proposed development.

Core Ground 8

The Board had granted the previously proposed development, however, the submitted statement of contravention had not considered the reduced separation distances proposed on site. This was a requirement of the SHD process.

Response

The proposed development is submitted under Section 179 of the Act and, therefore, does not require the preparation of a statement of contravention. With regard to separation distances, we refer to Section 4. 0 of this report which highlights how the layout and scale of the development has been designed to protect the residential and visual amenity of the surrounding area through sufficient separation distances and design considerations to protect existing amenities.

Core Ground 9

The material contravention proposed as part of the previous application is considered repugnant to the Constitution.

Response

The proposed development is submitted under Section 179 of the Act and, therefore, does not require the preparation of a statement of contravention.

Core Ground 10

The material contravention proposed as part of the previous application does not accord with the SEA Directive.

Response

The proposed development is submitted under Section 179 of the Act and, therefore, does not require the preparation of a statement of contravention.

It is considered that all matters highlighted in the Judicial Review have been addressed with the current proposal, as submitted under Section 179 of the Act, and ensure the proper planning and sustainable development of the area.

3.2 Surrounding Area

A review of planning applications in the surrounding area has been actioned, with the results of this included below and overleaf.

Hawthorn, Farranboley, Dublin 14 (c. 100m southeast of the subject site)

Reg Ref. D15A/0191 Planning permission granted by Dún Laoghaire-Rathdown County Council on 18th September 2015 for the construction of 53 no. dwellings.

The development was appealed under ABP Ref. 245621. The Board upheld the decision of the Council and on 26th February 2016, an order to grant permission was made.

Reg Ref. D16A/0611 Planning permission granted by Dún Laoghaire-Rathdown County Council on 16th February 2017 for amendments to the western boundary of the site.

Reg Ref. D17A/0189 Planning permission granted by Dún Laoghaire-Rathdown County Council on 1st June 2017 for alterations to the previously proposed development in compliance with condition no. 3 of the grant of permission under Reg. Ref. D15A/0191 inclusive of the omission of dwelling nos. 9 and 10 and replacement with a part-single, part-three storey detached dwelling.

Reg Ref. D17A/0223 Planning permission granted by Dún Laoghaire-Rathdown County Council on 29th August 2017 for alterations to previously approved development under Reg. Ref. D15A/0191 inclusive of a revisions layout in the northeast corner.

The development was appealed under ABP Ref. 249290. The Board upheld the decision of the Council and on 9th February 2018 an order to grant permission was made.



Figure 14.0 3D image of the development granted under Reg. Ref. D15A/0191 (amended under Reg. Ref. D16A/0611, D17A/0189 and D17A/0223).

As demonstrated by both the planning history associated with the subject site, which sets out a precedent for the development of the site and the surrounding areas which highlights the capacity for additional residential development which protects existing amenities while increasing height and density, there is clear capacity at the site for residential development. It is considered that the proposal that proposes the construction of 129 no. units in 3 no. blocks of 2-6 no. storeys is considered to be suitably designed and scaled for the site, having regard to the context of the surrounding area and the protection of residential and visual amenities.

Furthermore, the proposal demonstrates compliance with local and national planning policy, which will be discussed in detail in Sections 5.0 and 6.0 of this report.

4.0 Proposed Development

The proposed development comprises the construction of 129 no. residential units consisting of 72 no. one-beds, 23 no. two bed (3-person) and 34 no. two-bed (4-person) units in 3 no. blocks. The breakdown of the proposed development with regard to each block is detailed below and overleaf.

Block A

Block A of the proposed development is situated to the west of the site and is a part 5, part 6-storey block of 65 no. units comprising 33 no. one-beds, 17 no. two-bed/three-person and 15 no. two-bed/four-person units. Each unit is provided with private amenity space in the form of a balcony.



Figure 15.0 Northern elevation of Block A of the proposed development.



Figure 16.0 Southern elevation of Block A of the proposed development.



Figure 17.0 Eastern elevation of Block A of the proposed development.



Figure 18.0 Western elevation of Block A of the proposed development.

Block B

Block B of the proposed development is situated in the centre of the site and is a part 5, part 6-storey block of 56 no. units comprising 35 no. one-beds, 6 no. two-bed/three-person and 15 no. two-bed/four-person units. Each unit is provided with private amenity space in the form of a balcony.



Figure 19.0 Northern elevation of Block B of the proposed development.

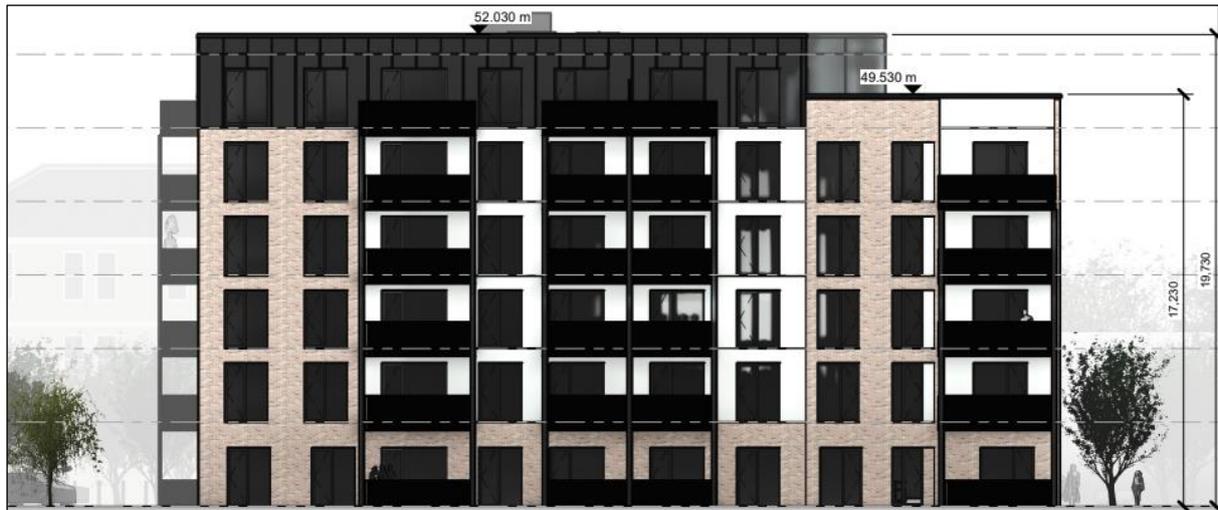


Figure 20.0 Southern elevation of Block B of the proposed development.



Figure 21.0 Eastern elevation of Block B of the proposed development.



Figure 22.0 Western elevation of Block B of the proposed development.

Block C

Block C of the proposed development is situated to the east of the site and is a two-storey block of 8 no. units of 4 no. two-bed/four-person units at ground floor level and 4 no. one-beds/two-person at first-floor level. The ground floor units are provided with private amenity space to the rear in the form of a terrace and are provided with bin stores to the front with additional space suitable for bike storage. The first-floor units are provided with private amenity space to the front in the form of a balcony and are provided with a bin store to the south.



Figure 23.0 Eastern elevation of Block C of the proposed development.



Figure 24.0 Western elevation of Block C of the proposed development.



Figure 25.0 Southern (l) and northern (r) elevations of Block C of the proposed development.

Overall, the site will be served by 65 no. car parking spaces, 180 no. cycle parking spaces, 2481 sq.m public open space (25.31% of the overall site area) and 889 sq.m communal open space. The proposal is considered compliant with local and national planning policy, which will be discussed further in Sections 5.0 and 6.0 of this report.

The proposed development has been designed to ensure a high-quality residential development which integrates into the site, having considered the site's context with regard to existing residential amenity. This is evident through the layout of the proposal as we note that the lower, two-storey element of the

development (Block C) is situated to the east of the site, which adjoins the established Churchfields residential development, which comprises two-storey detached and semi-detached dwellings. This consideration ensures a proposal which integrates into the context of the site and protects existing residential and visual amenity by protecting daylight access, providing for appropriate massing and ensuring separation distances which avoid overbearing impacts.

Additionally, a high-quality landscaping strategy has been prepared by RMDA Landscape Architects and Consultants and is submitted with this Planning Report. The landscape plan considers the previously proposed development on site along with guidance as set out in the Development Plan regarding the development of lands with an INST objective. As such, 26.6% of the overall site area is provided as public open space situated to the north of the site. In addition to this, a play area is situated to the northeast of the site. The landscape plan ensures that the amenity spaces are accessible and usable, promoting both active and passive uses.

Ensuring a high-quality landscape plan has been integral to the development of the proposal. We refer to Section 4.3.1.4 of the Development Plan, which provides guidance for densities on lands with an INST objective of 35-50 dwellings per hectare. The proposal of 129 no. units on a 0.98263 ha site results in a density of 131 no. units per hectare. While we note that this exceeds the standard Development Plan density guidance for lands with an INST objective, we would note that development proposals may exceed this where it can be demonstrated that the open space character of a site can be protected. In the instance of the proposed development, it is considered that the high-quality landscape proposal ensures the protection of this open space character and therefore, the proposed density is acceptable. Additionally, the proposed density is supported by local and national planning guidance, which is detailed further in Sections 5.0 and 6.0 of this report.

The proposed site coverage of 20.9% is considered suitable for the site in order to ensure the necessary provision of public and communal open space as part of the development, while protecting the open space character of the site, as required by sites with an INST objective. Additionally, the proposed plot ratio of 1.02 ensures a proposal with a suitable massing to avoid appearing overbearing in scale, protecting the existing residential and visual amenities of neighbouring properties.



Figure 26.0 Site plan of the proposed development.



Figure 27.0 Northern contextual elevation of the proposed development.



Figure 28.0 Southern contextual elevation of the proposed development.



Figure 29.0 Eastern contextual elevation of the proposed development.



Figure 30.0 Western contextual elevation of the proposed development as viewed from Dundrum Road.

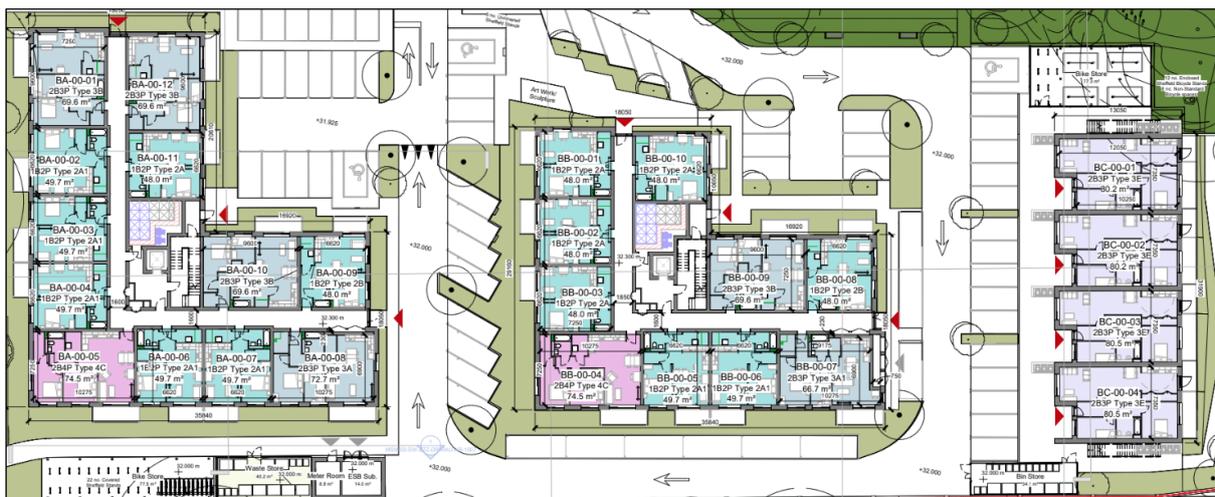


Figure 31.0 Ground floor plan of the proposed development.



Figure 32.0 First floor plan of the proposed development.



Figure 33.0 Second floor plan of the proposed development.



Figure 34.0 Third floor plan of the proposed development.



Figure 38.0 CGI of the proposed development as viewed from the south.



Figure 39.0 CGI of the proposed development as viewed from the north.

5.0 Response to Request for Information from Dún Laoghaire-Rathdown County Council

A request for information was received from Dún Laoghaire-Rathdown County Council dated 16th January 2025. This report sets out the responses in full. The following section of this report sets out the response in full to the requested information.

Item No. 1– Transitional Zonal Areas and the Curtilage of a Protected Structure

Having regard to the building being proposed adjacent to a site with a zoning objective F it is considered that the proposed development should also be assessed against section 13.1.2 Transitional Zonal Areas.

Having regard to the subject site being within the curtilage of a protected structure Emmet House, it is considered that the proposed development should also be assessed in terms of its impact on the character, context and setting of Emmet House.

Applicant's Response

While it is considered that the proposed development aligns with guidance set out in the Compact Settlements Guidelines, we also consider the proposal in the context of the Development Plan which provides guidance for the development of sites with an 'INST' objective. As such, the development of the design has considered this guidance and provides for a development which protects the open space character of the site through the provision of an extensive quantum of public open space. The proposed scale and height is appropriate and adequate for the transition to land within zoning objective 'F'. High density apartment units are often found directly adjacent to public parks and areas of open space, for example at Herbert Park in Ballsbridge and St. Anne's Park in Clontarf, in Dublin.

Additionally, with regard to the preparation of a masterplan ensuring compliance with Development Plan guidance, we refer to the masterplan drawing prepared by Reddy Architecture and Urbanism submitted with this Planning Report which considers a masterplan for the site. With regard to lands to the south of the site, we would note that Objective F zoning with the objective 'to preserve and provide for open space with ancillary active recreational amenities'. As such, it is not considered that the lands to the south should be developed further at this time and we would note that the lands are currently used as the CUS Rugby Grounds and, therefore, have an existing land use which accurately reflects the site's zoning. As such, it is not considered that a masterplan is required for these lands as the existing land use provides for open space with active recreational amenities in keeping with the zoning objective.

Additionally, we would refer to the following included in the Inspector's Report for the previously approved SHD on the site with regard to the masterplan prepared which did not include the CUS lands to the south:

'The applicant in their Statement of Consistency outlines that they have no control over the adjoining lands, namely the sports fields at CUS and also that the 'INST' designation does not extend to this site to the south. They therefore did not consider it appropriate to include these lands as part of the masterplan. I note from an examination of the relevant zoning Map 1 of the operative CDP that the 'INST' Specific Local Objective 'stamp' is in fact completely located on the subject site which has a Use Zoning Objective "A" and does not extend onto the Use Zoning Objective "F" lands to the south. In addition, I note from an examination of other "INST" designations in the area that these too are located on Use Zoning Objective "A" lands, all of which relate to residential lands. The planning authority does not explicitly state whether the CUS lands would be considered to be covered by the INST designation, but they do state that the exclusion of some lands from the masterplan would result in an uncomprehensive masterplan'.

'From an examination of Section 8.2.3.4 (xi) I note that a masterplan must adequately take account of the built heritage and natural assets of a site and established recreational use patterns. I would consider the submitted masterplan has adequately addressed these matters and is informed by the other documents and assessments which form part of the application which include the Architectural Heritage Impact Assessment, the Arboricultural Impact Assessment, the Landscape Masterplan and the three environmental assessments submitted, namely the EIA Screening Report, the AA Screening Report and the EclA. I therefore consider that the masterplan adequately addresses the built heritage and natural assets on site'.

'While I acknowledge the planning authority's concerns and the concerns raised by third parties in relation to the exclusion of the CUS grounds from the overall Masterplan, I believe that the applicant has provided sufficient provision for future links to these lands'.

'To conclude this point, I do not consider that the exclusion of the CUS lands to the south of the subject site from the masterplan would constitute a material contravention of the operative CDP. The submitted masterplan in my opinion has adequately taken account of the built heritage and the natural assets of the site, as well as any established recreational use patterns. Public access has also been taken into account'.

We would consider that the masterplan prepared for the proposed development which includes a potential layout for the lands to the north, demonstrates compliance with the Development Plan, having regard for the commentary included in the Inspector's Report of the previously proposed development at the site. We would highlight that the INST objective is situated on the subject lands which are zoned objective A and do not extend to the lands to the south with an objective F zoning objective. In this regard, it is considered that the omission of a masterplan of these lands is acceptable with regard to Development Plan guidance.

There are no protected structures on site, as such, the development does not propose work to a protected structure. We would note, however, that Emmet House (RPS No. 18) is situated to the north of the site. The Development Plan states the following with regard to the extent of a protected structure:

'A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure, any other structures lying within that curtilage and their interior and all fixtures and features which form part of the interior or exterior of that structure'.

We would note that Emmet House is set back from the boundary of the subject site by a paved area which is part of the internal road network of the neighbouring site. In this regard, it is considered that the proposal will not impact the curtilage of the protected structure, therefore protecting the architectural heritage, character and amenity of the structure.

The location of the protected structure with regard to the subject site has been considered throughout the design process. The proposal has been designed to protect the architectural heritage and character of Emmet House by providing significant setbacks to ensure that the proposal does not appear overbearing or overly dominant in scale, allowing Emmet House to be read in its own context. At its closest point, Block A is situated 29.5 metres from the façade of Emmet House. In this regard, it is considered that significant separation distances have been provided to ensure the protection of the Character of Emmet House. Additionally, the proposed public open space situated to the north of the site provides a buffer between the proposed development and Emmet House and retains the similar context of Emmet House at present. In this regard, it is considered that the proposal has sufficiently considered the context and character of Emmet House and has been designed to successfully ensure the protection of the architectural heritage and character.

To ensure clarity on the protection of the architectural heritage and character of Emmet House, we would refer to the Architectural Heritage Impact Assessment prepared by Chris Ryan. This assessment notes that the proposal has been designed to minimise any adverse effect on Emmet House and highlights that due to the development proposed and alterations to the subject site boundary along Dundrum Road, this will increase visibility of Emmet House to the public, allowing for the architectural heritage and contributions of this structure to be visible. In noting this, the assessment also states that the development has successfully ensure the retention of the character and significant of Emmet House.

Item No. 2 – Linkage to the Open Space Lands and Hawthorn Estate

The proposal has been revised to include a path that extends to the corner of the site which subject to 3rd party consent can be modified to link to the Hawthorne estate.

The proposed link is shown to be at the southern end of the eastern boundary of the site on the Proposed Site Layout Plan dated August 2024; Drawing No: 24093-X-L00-DR-TNT-CE-3000 Revision P03 (see below). The Planning Authority note that the proposed link has not been included on other submitted Site Wide Plans and therefore the Planning Authority recommends that all plans be amended to include the link.



In addition to the above proposed link, the design team are requested to consider including a second link on the southern boundary of the site (see red arrow above). It is the view of the Planning Authority that the addition of these linkages in the current design will facilitate their realisation in the future through securing 3rd party consents and in turn will add a quiet active travel route from the Dodder to Dundrum.

Applicant's Response

In response to the above, the proposed link at the southern end of the eastern boundary and the second link on the southern boundary, as depicted in the Council's comments, will be included in the Part 8 submission. All plans submitted as part of the formal application will include these links. However, it is noted that they will be subject to third party consent.



Amended Site Layout Plan incorporating linkages to neighbouring sites.

Item No. 3 – Passive Surveillance

Passive Surveillance

DLR Planning Department stage 3 comments relayed concerns about passive surveillance...

- ..to the southwestern corners Pedestrian Entrance and the bicycle Storage, with suggestions that the bicycle storage areas be located near the main entrances to each of the proposed blocks. The letter received from Hughes Planning, stated that

'more detail with regard to bin storage, cycle parking and passive surveillance will be submitted as part of the revised pack when it is published for Public Consultation in January 2025.'

- ..from Block A. With regards to Block A, DLR Planning Department suggested including balconies onto the north facing corner of the Block at the main entrance. The letter received from Hughes Planning, indicated an Architectural Justification Response Report in relation to the facade and building elevational treatment dealt with this matter. Review of referred to report does not provide any information in relation to the above. Furthermore, review of the submitted plans indicate that balconies are proposed on the northwestern parts of the western elevation of Block A to serve the respective corner apartments and large floor to ceiling windows are also proposed on the northern elevation of same. The Planning Authority consider this to be sufficient to ensure passive surveillance over the northern part of the site can be achieved.
- ..from Block C. With regards to block C the proposal has been amended to include a window on the upper floor of the northern elevation of the maisonettes and the Planning Authority considers this to be sufficient to ensure passive surveillance to the proposed park on the north.

Applicant's Response

In response to Item No. 3, the Architectural Justification Response Report has been updated to include references to the façade and building elevational treatment of the apartment blocks.

Item No. 4 – Storage

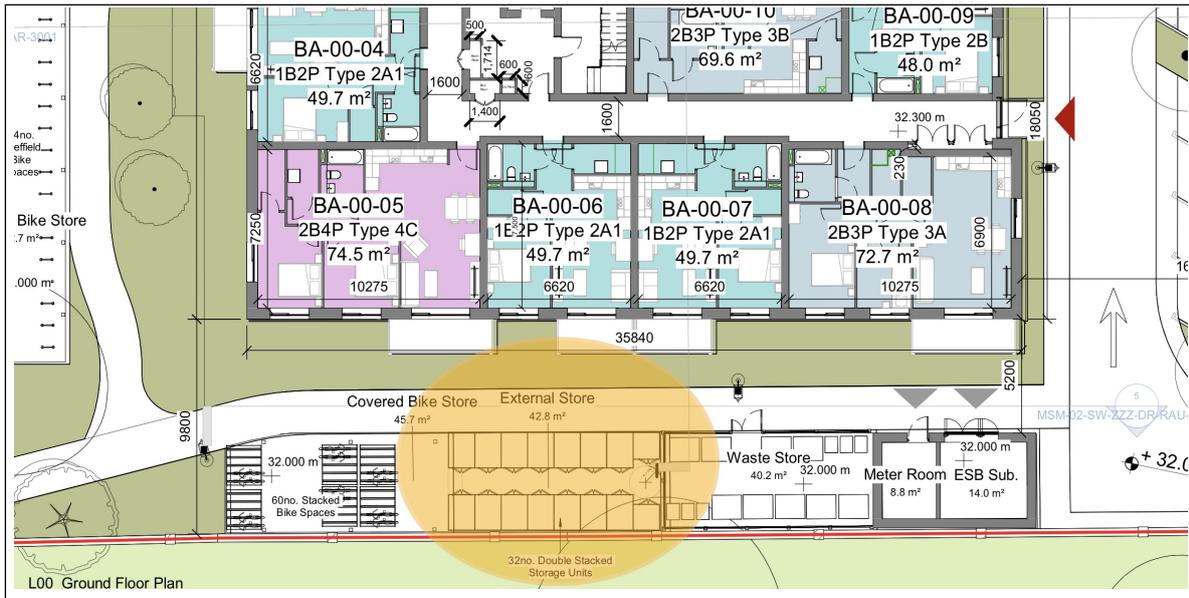
The proposed external storage provisioning of the proposed unit apartments and duplexes is assessed against section 12.3.5.3 *Internal Storage and External Storage* of the Dún Laoghaire Rathdown County Development Plan 2022-2028 which states:

'Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.'

The Planning Authority note that proposed apartment Blocks A & B do not provide External Storage spaces at ground floor to serve each of the apartment units. It is recommended that one of the ground floor apartments in both proposed apartment Blocks A & B is substituted as **External Storage** spaces to serve each of the apartments to accord with the anticipated outcomes under section 12.3.5.3 *Internal Storage and External Storage* of the County Development Plan 2022-2028.

Applicant's Response

In response to the above item, we have researched the suggestions of incorporating storage uses into two of the existing residential units. While we cannot justify a reduction in the proposed scheme to 127 no. residential units, we have looked into alternative locations for the provision of external storage units.



The prospect of losing 2 no. units to facilitate external storage has been discussed with the Dialogue Panel and deemed unviable. An alternative solution has been identified to place the storage area within the existing bicycle storage structure, as indicated outlined in blue above.



Images of the amended bicycle storage structure to include external storage space

Item No. 5 – Building Height

DLR Planning Department Stage 3 comments relayed concerns about the proposed building heights to which the developer stated that more justification for height is to be provided in the planning statement at the public consultation stage. This does not assuage the Planning Authority, and the concerns are reiterated regarding adherence to Table 5.1, and the Building Height Strategy (BHS) (Appendix 5) of the Dún Laoghaire-Rathdown County Development Plan, 2022-2028 and the potential for overbearing and overshadowing effects both internal and external to the subject site.

Therefore, it is recommended that this information be submitted to the Planning Authority for consideration prior to the public consultation stage.

Applicant's Response

The proposed development includes blocks with heights of part 5, part 6 storeys. From a review of the immediate surrounding area, there is an established pattern of development of two-storey, low-density

dwellings. Despite this, however, additional height can be provided in instances where consideration is made to the prevailing context of a site and a proposal is designed to ensure the protection of residential amenities while ensuring a high level of amenity for future occupants on a well-served and underutilised site. We would consider there to be an opportunity at the subject site for additional development and heights which exceed that as established.

The proposal has ensured significant setbacks from neighbouring properties and block layouts which avoid the proposal appearing overbearing in scale, protecting existing amenity while providing additional housing on this well-served site. The Development Plan makes reference to the Building Height Strategy and that proposals for increased heights should have due regard for this strategy. We would note the following policy objective in this instance:

Policy Objective PHP42: Building Design & Height

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).

Further to this, the site is situated in an area deemed to be a ‘residual suburban area’. In this regard, we would note the following policy objective included in the Building Height strategy:

Policy Objective BHS3: Building Height in Residual Suburban Areas

It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.

Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.

An assessment of the development against Table 5.1 of Section 5 of the Building Height Strategy has been undertaken and is outlined below.

Criteria for All Such Proposals	Demonstrated Compliance
1. At County Level	
a. 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.	The proposed development provides for 129 no. units on a well-served and underutilised site within the built-up footprint of Dublin, demonstrating compliance with National Policy Objectives 3a and b, specifically, of the NPF.
b. 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.	The subject site is within 500 metres of the Milltown Luas Stop. Additionally, the site is served by high-frequency public transport along Dundrum Road to the immediate west of the site, with services having a peak frequency of 10-minutes connecting the site to the city centre and surrounding areas as well as links with other modes of public transport.
c. Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural	The proposal has been designed to successfully integrate into the character and public realm of the area. Due to the layout of the proposal,

<p>context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</p>	<p>passive surveillance will be provided along Dundrum Road and, in addition to the high-quality architecture proposed, will significantly enhance the public realm. The site adjoins the site of a protected structure to the north. This has been considered throughout the design process, and significant separation distances are provided to ensure the protected structure can remain legible without impact from the proposed development.</p>
<p>d. 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>As noted, the proposed development has been designed with setbacks from the site of the protected structure to the north and, as such, protects the view of this structure. It is noted, however, that there are no protected views and prospects identified at the site.</p>
<p>e. Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</p>	<p>The subject site is situated on well-served and accessible lands. Infrastructure in the surrounding area includes frequent bus and Luas services as well as education, sports fields and public open space.</p>
<p>2. At District/Neighbourhood/Street Level</p>	
<p>a. Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The proposal has been designed to consider the context of the site and the predominantly low-rise nature of neighbouring residential properties. In this regard, we note the location of Block C to the east of the site, which comprises two-storey duplex units, where the site adjoins the Churchfields development. Additionally, blocks A and B, with heights of part 5, part 6-storeys are situated to the west and centre, respectively, of the site and have been setback from neighbouring properties to ensure these integrate into the built environment. Furthermore, we note the placement of Block A to the west of the site, which overlooks Dundrum Road, providing passive surveillance. In addition to this, the high-quality architectural design will ensure the enhancement of the built environment, making a positive contribution to the streetscape.</p>
<p>b. Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</p>	<p>As demonstrated within the architectural pack prepared by Reddy Architecture and Urbanism, the proposed development includes undulating facades and the use of a variety of materials which provide for interesting facades as well as reducing the perceived massing and avoiding a proposal which appears monolithic. Additionally, block lengths are not considered to be excessive and, therefore, avoid long uninterrupted walls of buildings.</p>
<p>c. Proposal must show use of high quality, well considered materials.</p>	<p>We would refer to the Design Statement prepared by Reddy Architecture and Urbanism, which highlights the varying materials used throughout the development which contribute to the overall appearance of the site and development. The materials have been selected to complement the existing palette of materials in the surrounding area while allowing for the site to create its own identity. The materials chosen provide visually interesting and appealing</p>

	<p>facades which contribute to the public realm and surrounding area.</p>
<p>d. Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</p>	<p>The subject site does not comprise a thoroughfare, however, we note that the site comprises an existing pedestrian entrance to the east of the site at the Churchfields residential development. The layout of the proposal has been designed to facilitate the potential future use of this entrance, enhancing connectivity and permeability in the surrounding area. The proposal has been designed to ensure that the proposed pathways connecting to the neighbouring areas are overlooked, ensuring feelings of safety and security. The proposed blocks also overlook the proposed communal and public open spaces, providing for passive surveillance. As such, it is considered that the proposal is in keeping with proper urban planning and design objectives, enhancing urban design context for public spaces.</p>
<p>e. 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>	<p>The proposed development does not adjoin Dundrum Road directly, as the proposal includes the retention of part of the existing boundary wall. Despite this, however, we would note that the proposal interacts positively with the internal street network of the development, providing for a high level of visual amenity through the use of a variety of high-quality and considered materials, ensuring future occupants are provided with a development which is visually pleasing. As the site is currently vacant and undeveloped, it is considered that the proposal enhances the legibility of the site and develops the site's character.</p>
<p>f. Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.</p>	<p>The subject site is zoned Objective A in the Development Plan, and therefore, the range of uses is restricted. Despite this, however, the proposal is considered to positively contribute to the available amenities in the surrounding area as it is proposed to provide 2,616 sq.m of public open space, which is available for future occupants of the development and existing occupants of the surrounding area. Additionally, the development provides for 129 no. units comprising 72 no. one-beds, 29 no. two bed (3-person) and 28 no. two-bed (4-person) units addressing a variety of housing needs and supporting a mixed community.</p>
<p>g. Proposal should provide an appropriate level of enclosure of streets or spaces.</p>	<p>As evident by the architectural drawings prepared for the development, the proposal ensures an appropriate level of enclosure of the internal street network. The proposed development does not interact directly with Dundrum Road, however, we would note the proximity of Block A to the western site boundary, which is considered to enhance the streetscape of Dundrum Road and create a sense of enclosure while ensuring avoiding overbearing and overlooking impacts of neighbouring properties.</p>

<p>h. Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>	<p>The proposed development is considered to be an appropriate urban grain for the site and nature of the proposal, which allows for the provision of 129 no. units on this well-served and underutilised site. The urban grain has been established to ensure that development does not appear overbearing on the site and avoids a massing which is not considered to be at a human scale. These considerations provide for a development with visually appealing facades and appropriate massing. Additionally, the spaces between buildings allow for social interactions, providing a means of social capital and supporting a healthy and connected community. These spaces can be seen throughout the site and are overlooked, providing a sense of comfort and security.</p>
<p>i. Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>	<p>The proposed development introduces heights which exceed that as typically established in the surrounding area. As such, due regard has been given to the potential impact taller buildings can have on existing residential properties. As such, appropriate setbacks have been provided from existing dwellings which neighbour the site, protecting residential amenities. The proposal is considered to establish a new character of development in the area. In noting this, the design and layout of the proposal ensure successful integration into the context of the site and, due to the use of materials and considerations to scale and the design of the facades of the development, is considered to make a positive contribution to the character and identity of the neighbourhood. The site, which is currently undeveloped, will have a high level of communal and public open space retained and will, therefore, enhance amenities in the area. Additionally, it is considered that the high levels of open space provided ensure the protection of the open space character of the site while allowing for residential development within the built-up footprint of Dublin.</p>
<p>j. Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</p>	<p>The proposal has been designed to consider the form of buildings and landscape around the site's edge. In this regard, we note the location of Block C to the east of the site, which comprises two-storey duplex units, where the site adjoins the Churchfields development, which also comprises two-storey dwellings. Additionally, Blocks A and B, with heights of part 5, part 6-storeys are situated to the west and centre, respectively, of the site and have been setback from neighbouring properties to ensure there are no negative impacts with regard to privacy and daylight access.</p>
<p>3. At site/building Scale</p>	
<p>a. Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</p>	<p>The proposal ensures a design which maximises access to natural daylight, ventilation and views while avoiding overshadowing neighbouring properties as well as those proposed within the</p>

	<p>site. 50.4% of units are dual aspect, ensuring that future occupants are provided with high levels of daylight access. We would also refer to the daylight/sunlight report prepared by 3D Design Bureau, which includes an assessment of daylight access for the proposed units and neighbouring dwellings where it is considered that the proposal will protect existing amenities with regard to daylight access and ensure that future occupants are provided with high levels of access in keeping with BRE regulations.</p>
<p>b. 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 out. On relatively unconstrained sites requirements should be met.</p>	<p>We refer to the Daylight/Sunlight Analysis prepared by 3D Design Bureau, which details compliance with BRE guidance.</p>
<p>c. Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.</p>	<p>As noted, block C of the proposed development is situated to the east of the site, which adjoins the Churchfields residential development. As such, this avoids overlooking these properties. Additionally, Dundrum Road separates the site from the dwellings to the west and affords high separation distances from Block A of the development and neighbouring properties, protecting privacy and daylight access.</p>
<p>d. Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</p>	<p>The site is not situated within an ACA, however, we would note that the site of a protected structure adjoins the subject site to the north. Block A of the proposed development is situated 29.490m at its closest point to the protected structure, which is considered to be significant and sufficient to ensure no impacts to the setting of the protected structure.</p>
<p>e. Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development</p>	<p>In this regard, we refer to the Climate Change and Energy Report prepared by TENT Engineering.</p>
<p>4. County Specific Criteria</p>	
<p>a. 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.</p>	<p>This criterion is not relevant to the subject site.</p>
<p>b. Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights</p>	<p>The proposed development will have no impact on the mountain landscape views from the County.</p>

and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.	
c. Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage).	A full planning pack has been compiled, which assesses each required item of the development to ensure a suitable proposal for the subject lands.
d. Specific assessments such as assessment of microclimatic impacts such as down draft.	This criterion is not relevant to the subject site.
e. Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.	Due to the locational context of the subject site, it is not considered that the proposal will have an impact on sensitive bird/bat areas.
f. Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.	The proposed development is not considered to be of a scale which could impact this.
g. An assessment that the proposal maintains safe air navigation.	The proposed development is not considered to be of a scale which could impact this.
h. Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.	AA Screening and EclA Reports have been prepared by Openfield Ecological Services. Additionally, an EIA Screening Report has been prepared by Altemar Environmental Consultants. The results of these reports show the proposed development is suitable for the subject and will not have significant impacts regarding these items.
i. Additional criteria for larger redevelopment sites with taller buildings	The site of 0.98263 ha providing for 129 no. units is considered to have the appropriate documents prepared to ensure a proposal which allows for an assessment of the development against all required elements.
j. 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 comprises 3 no. blocks of varying scales with heights between 2-6 storeys and setbacks introduced at upper levels of Blocks A and B to ensure an appropriate massing for the site. Undulating facades and the use of a variety of materials throughout the proposed development ensure visual interest and a high level of amenity. The subject site is situated in an area of traditionally low density, however, the proposal is considered to have been designed to integrate into the site, protecting amenities and using setbacks and design considerations to protect this character while providing for increased heights and densities.
k. For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.	We refer to the Daylight/Sunlight Analysis prepared by 3D Design Bureau, which details compliance with BRE guidance.

A review of precedent planning applications in the surrounding area has been actioned, with the results of this included below.

Marmalade Lane, Wyckham Avenue, Dundrum, Dublin 16 (c. 3km south of the subject site)

ABP Ref. 312170 Planning permission granted by An Bord Pleanála on 8th April 2022 for the construction of 531 no. Build to Rent apartments, creche and associated site works.

The development, granted on INST-zoned lands, was required to demonstrate compliance with local planning policy on how this would comply with the site's objective. We would refer to the following extract from the Inspector's Report:

'The proposed level of open space would ensure that the "open character" of the institutional lands would be maintained as required by the Development Plan along with the retention of a significant number of trees and natural boundaries.

Furthermore, the development would for the first time make the development lands and the new public spaces fully open to the public which is a significant planning gain given that the existing institutional lands are in private ownership and provide no direct recreational or amenity benefits to the wider area. It is considered that proposed development does not materially contravene the development plan in relation to the provision of open space on lands subject to 'INST' objective.'

The proposal, to which this report pertains, similarly seeks to develop the subject site which has an INST objective. Despite this, however, we would highlight the positive commentary included in the Planner's Report regarding the provision of open space on site which would result in a planning gain as the site was not considered to be contributing to the amenities of the area in its previous form. With regard to the subject site, it is noted that the lands are not considered to have recreational value and, similarly, also are not considered to contribute to the community amenities of the surrounding area. The proposal has been designed with 26.6% of the site area comprising public open space. This space, situated to the north of the site, includes a designated play area and, overall, supports both active and passive uses. In this regard, it is considered that similarly to that as granted under ABP Ref. 312170, the proposal will contribute a planning gain to the surrounding area, providing additional community infrastructure through high-quality public open space.

'Having regard to the quantity and quality of the open space proposed within the scheme and the overall institutional landholding, the sites use as an agricultural field and the lack of existing publicly available open space within the overall institutional landholding and within the subject site, I am satisfied that the open character of these institutional lands is being retained and expanded. In addition, it is noted that Policy RES5 states 'it is Council policy to retain the open character and/or recreational amenity of these lands wherever possible, subject to the context of the quantity of provision of existing open space in the general environs'. I note 'wherever possible' in the context of this policy. With regard to recreational amenity and uses on site, in this instance, the lands would appear to have historically offered very little in the way of recreational amenity, and were fenced off from the general public, which remains the case today. I am, therefore, satisfied that the development of these lands would not result in any net loss of recreational amenity for the wider area. Therefore, it is my view that the proposed development is in accordance with Section 8.2.8.2 of the development plan and Policy RES5. It should also be noted that the site is located within the existing urban area and the development of the site would significantly contribute to the consolidation of the urban environment.'

The development, as granted under ABP Ref. 312170, introduces heights of up to 10-storeys in the tallest blocks. We would highlight the context of the area immediately surrounding the site, which predominantly comprises one and two-storey detached and semi-detached dwellings. While the approved accommodation development was within a context of low-rise dwellings, the proposal was considered acceptable, with the Inspector's Report noting the following:

'It is noted that the existing adjacent residential properties (visual receptors) are more sensitive to change and that the value of that change is largely subjective. The site is locally elevated, and it is acknowledged that the blocks would be highly visible when viewed directly from the site boundaries and adjacent residential properties. It is also accepted that the proposed height is significantly taller than the existing adjacent buildings and would introduce new features in the skyline. However, I agree with the findings of the LVIA and consider that the proposed height would not significantly detract from the visual amenities of this urban area and would not be visually obtrusive. In my opinion the visual impact from short range views, would be generally positive due to the current vacant nature of the site, the high-quality contemporary design of the scheme and the transition in height with lower elements of the buildings located at the sites boundaries and the significant separation distances proposed.'



CGI's of the development granted under ABP Ref. 312170.

Hawthorn, Farranboley, Dublin 14 (c. 100m southeast of the subject site)

Reg Ref. D15A/0191 Planning permission granted by Dún Laoghaire-Rathdown County Council on 18th September 2015 for the construction of 53 no. dwellings.

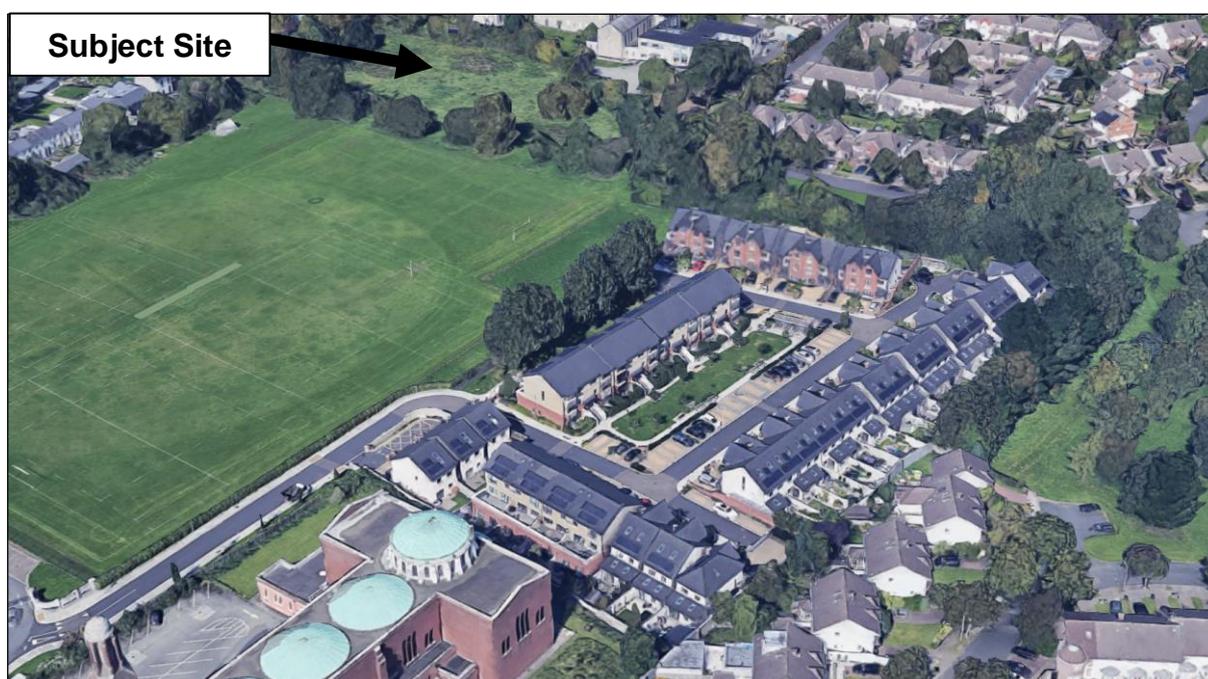
The development was appealed under ABP Ref. 245621. The Board upheld the decision of the Council and on 26th February 2016, an order to grant permission was made.

Reg Ref. D16A/0611 Planning permission granted by Dún Laoghaire-Rathdown County Council on 16th February 2017 for amendments to the western boundary of the site.

Reg Ref. D17A/0189 Planning permission granted by Dún Laoghaire-Rathdown County Council on 1st June 2017 for alterations to the previously proposed development in compliance with condition no. 3 of the grant of permission under Reg. Ref. D15A/0191 inclusive of the omission of dwelling nos. 9 and 10 and replacement with a part-single, part-three storey detached dwelling.

Reg Ref. D17A/0223 Planning permission granted by Dún Laoghaire-Rathdown County Council on 29th August 2017 for alterations to previously approved development under Reg. Ref. D15A/0191 inclusive of a revisions layout in the northeast corner.

The development was appealed under ABP Ref. 249290. The Board upheld the decision of the Council and on 9th February 2018 an order to grant permission was made.



3D image of the development granted under Reg. Ref. D15A/0191 (amended under Reg. Ref. D16A/0611, D17A/0189 and D17A/0223).

As demonstrated by the precedent for development of the surrounding areas which highlights the capacity for additional residential development which protects existing amenities while increasing height and density, there is clear capacity at the site for residential development. It is considered that the proposal that proposes the construction of 129 no. units in 3 no. blocks of 2-6 no. storeys is considered to be suitably designed and scaled for the site, having regard to the context of the surrounding area and the protection of residential and visual amenities. The consented scheme reaches up to 10 storeys and the proposed reduction from this height will be viewed more favourably by neighbouring residents.

Item No. 6 – Proximity to Trees

DLR Planning Department Stage 3 comments relayed concerns about the proposed close proximity of the building footprint of Block A to a number of the trees both proposed to be retained and proposed to be removed, which the developer indicated that construction detailing of root protection measures and replacement planting mitigation will be presented at consultation stage to ensure viability. The Planning Authority acknowledge that this matter will be reviewed by the DLR Parks and Landscape Services Department.

Therefore, the Planning Authority recommends that prior to commencement of works that a Landscaping Plan, along with details on Root Protection Measures to be implemented, and details of the Arboricultural Specialist to be engaged during the construction phase be submitted to DLR Parks and Landscape Services Department for their written approval.

Applicant's Response

Concerns in relation to the safeguarding of retained trees adjacent to Block A will be ensured and construction detailing on Root Protection Measures of same will be agreed to guarantee viability with Parks and Landscape Services.

Item No. 7 – Bulk and Mass Transition Between Block C and Block B

Bulk and Mass Transition Between Block C & Block B

DLR Planning Department Stage 3 comments suggested Block C could be marginally increased in height which would help to reduce any abrupt visual changes to the bulk and massing of Block B and Block C to which the developer responded that the positive feedback is noted and welcomed and will be considered as part of the revised proposal at the public consultation stage.

The Planning Authority do not consider this response to be satisfactory and recommend that this information be submitted to the Planning Authority for consideration prior to the public consultation stage.

With regards to the site being adjacent to zoning objective 'F' the Planning Authority have noted above concerns relating to the bulk and massing and it is recommended that that information be submitted to the Planning Authority for consideration prior to the public consultation stage.

Applicant's Response

It is considered that the massing and form of the proposed blocks have been appropriately organised to maximise access to natural daylight while protecting the existing residential amenities of neighbouring properties, ensuring retained daylight access.

It is our opinion that the proposed development on site that seeks to provide a maximum height of part 5, part 6 storeys, relative to the context of the site, is in line with national policy and allows for compact growth within the built-up area of Dublin as per the guidance. It is considered that the subject site is situated at a suitable location for development at a higher density and increased height than that as established in the area immediately surrounding the site. While this is the case, we would note that the development of the design of the proposal has considered the context of the site and ensures a proposal which protects residential and visual amenity while providing future occupants with a high level of amenity.

We would draw particular attention to the placement of blocks on the site, noting Block C to the east of the site which is a block of 2-storey duplex units adjoining the Churchfields residential development, protecting existing residential amenity. The taller blocks (Blocks A and B) are proposed to be situated towards the west and centre of the site, respectively. It is considered that the placement of these blocks

ensures the protection of amenity of dwellings surrounding the site. With particular regard to the dwellings to the west of the site, existing residents have been considered and will benefit from further separation distances provided by the Dundrum Road, providing transition space between the site and neighbouring sites. Photomontage images have been prepared by 3D Design Bureau which demonstrates the scheme's suitability for the site in the context of the surrounding area.

With a density figure of 131 no. units per hectare, it was integral throughout the design process to ensure that a proposal could be facilitated on site which considers the context of the surrounding area, protecting existing residential amenities. In this regard, the layout of the proposal provides for lower heights of two storeys to the east of the site where the site adjoins Churchfields and provides height of part 5, part 6 storeys towards the centre and west of the site. In this regard, it is considered that the distance between Block A, to the west of the site, and neighbouring residential properties are provided with ample separation distances and a buffer/transition zone to ensure that there are no negative impacts on residential amenity due to height. It is therefore considered that the proposed development includes heights and densities, which ensure the protection of residential amenities and are considered to be appropriate for the site.

6.0 National and Regional Planning Policy Context

The relevant planning framework comprises;

- Project Ireland 2040 - National Planning Framework;
- National Development Plan;
- Housing For All – A New Housing Plan for Ireland;
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024);
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and
- Dún Laoghaire – Rathdown County Development Plan 2022-2028

The following sections of this report assess the proposal against the relevant local and national planning guidance, demonstrating the development's compliance with additional development within the built-up footprint of Dublin.

6.1 Project Ireland 2040 – National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. A key element of national growth is the more efficient use of underutilised sites within existing built-up areas as per the following commentary from the Project Ireland 2040 document:

'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.

It is submitted that the proposed development has been suitably designed and scaled and provides high-quality residential accommodation while preserving existing residential amenities. Moreover, we would note the following National Policy Objectives as per Project Ireland 2040:

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 6 *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

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 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.*

The proposed development is consistent with the above as it involves the redevelopment of underutilised land for residential use. The site is in close proximity to existing facilities and public transport and can, therefore, support sustainable growth within the built-up footprint of Dublin. The development has been designed to integrate into the receiving environment, protecting visual and residential amenities of neighbouring properties. We would highlight the placement and layout of each block, which has considered the surrounding area. We would note Block C, which is situated to the east of the site and comprises 8 no. units in a two-storey duplex form, adjoins the Churchfield residential development, which comprises two-storey detached and semi-detached dwellings. In this regard, it is considered that the placement of Block C to the east ensures the protection of existing amenities and allows for the successful integration of the proposed development into the context of the site by ensuring an appropriate buffer between the existing low-rise character of the surrounding area and increased density of the proposed development.

The taller elements of the proposal are situated to the centre and west of the site, where the site is separated from the residential properties to the west by Dundrum Road, therefore providing a sufficient transition space between the existing two and three-storey dwellings and the proposed part 5, part 6-storey residential blocks (Blocks A and B). Furthermore, the proposal comprises a varied housing typology, supporting vitality in the community and addressing a variety of housing needs.

We would note that increased residential density through increased height is supported by policy set out in the Project Ireland 2040 – National Planning Framework document and, therefore, the proposal is considered to comply with these policies, providing for a development on a well-served and underutilised site within the built-up footprint of Dublin.

6.2 Project Ireland 2040 - National Development Plan

The National Development Plan 2018—2027, as updated, sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein.

‘By 2040 the population of Ireland is expected to reach almost 6 million with a need for 550,000 more homes and the creation of 660,000 additional jobs to achieve and maintain full employment. The need to provide in excess of half-a- million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year’.

The proposed development will contribute an additional 129 no. residential units to the national housing stock and is considered to reflect the type of compact, sustainable development that is sought throughout National Policy in regard to the appropriate development of under-utilised sites.

6.3 Housing For All – A New Housing Plan for Ireland

The 'Housing for All - A New Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme, which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the Plan is to ensure that everybody has

'access to sustainable, good quality housing to purchase or rent at an affordable price, built to high standard, and located close to essential services, offering high quality of life.'

The Plan seeks to increase new housing supply to an average of at least 33,000 new units per year with specific pathways outlined to achieve the four overarching objectives of the Plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

It is submitted that the proposal is consistent with the above policy as it provides an appropriate quantum of residential accommodation on a zoned and serviced suburban site. The provision of residential units on site, in the manner proposed under this Part 8 submission, results in increased social housing provision and provides for the efficient use of zoned and serviced land. The proposed development responds to a recognised need, at national level, for residential accommodation and is consistent with policy in this regard.

6.4 Regional Spatial and Economic Strategy for the Eastern and Midland Region, June 2019

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (DRSES), published in June 2019 is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

The RSES outlines the following objectives for Dublin City and Metropolitan Area:

- *To sustainably manage Dublin's growth as critical to Ireland's competitiveness, achieving growth to 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.*
- *To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within, or contiguous to, the existing built up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on health placemaking and improved quality of life.*

The RSES provides Key Regional Strategic Outcomes for the region, as well as Regional Policy Objectives, in alignment with the NPF's overarching focus on compact growth and sustainable development patterns. These include:

Regional Strategic Outcomes 1 Sustainable Settlement Patterns - Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth.

Regional Strategic Outcomes 2 Compact growth and Urban regeneration - Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens.

The RSES identifies a number of strategic development areas and corridors, of which the subject site is located along the Metrolink / LUAS Greenline Corridor with a total population capacity of 71,000. A

key aim is to unlock the development capacity of strategic development areas within the Dublin metropolitan area. The following Regional Policy Objective supports the proposed development:

'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.'

The proposed development is consistent with the above as it will provide housing to accommodate the population increase proposed in proximity to the Milltown Luas Stop. The proposed development contributes to the consolidation of land, as is sought within developed urban areas, and makes efficient use of land in close proximity to public transportation, supporting a consolidated and compact form of development within the existing built-up area of Dublin.

6.5 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009). With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policies and guidelines pertaining to the planning and development of urban and rural settlements.

Under the Compact Settlements Guidelines, the subject site is considered to be located in the City - Suburban/Urban Extension category of Table 3.1 – Areas and Density Ranges Dublin and Cork City and Suburbs. Under this category, we note the following with regard to density:

*'It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that **densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)**.'*

It is noted that *'lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services'* are considered to constitute an *'accessible suburban/urban extension location'*. In this regard, we would note that Go-Ahead Route No. S4 operates along Dundrum Road to the west of the site, with the site adjoining a stop which is served by this route. With a 10-minute peak frequency, the site can be categorised as an accessible suburban/urban location, and we would note that densities of up to 150 units per hectare are open for consideration at the subject site.

The proposal, which intends to provide 129 no. units on a 0.98263 ha site, results in a density of 131 no. units per hectare. Considering this proposed density with the design and layout of the proposal having due regard for existing residential amenities of neighbouring properties, it is considered that the site can suitably accommodate the proposal. This is evidenced further by the results of daylight/sunlight analysis prepared by 3D Design Bureau, highlighting how the proposal protects existing residential amenities. The proposal is considered to represent a compact and consolidated form of development as set out in the Guidelines.

The key priorities for compact growth in Cities and Metropolitan (MASP) Areas in order of priority are as follows:

- a) *strengthen city, town and village centres,*
- b) *protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- c) *realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development,*
- d) *deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,*

- e) *deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport, and*
- f) *deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the city and suburbs area or a metropolitan town.*

Due to the nature of the proposed development in the context of the site, it is considered that the proposal is representative of consolidated and compact development, which seeks to deliver brownfield and infill development at a scale which is at a suitable strategic and sustainable development location within the existing built-up footprint of Dublin. The site is well-served by public transport, which includes bus and Luas services, therefore presenting an ideal location for residential development. In this regard, future occupants will be provided with a high level of amenity at this accessible location, with access provided throughout the surrounding area, city centre and the wider County. This form of development on accessible and serviced lands ensures compliance with the proper planning and sustainable development of the area, avoiding sprawl by concentrating development within the built-up footprint of Dublin.

Further to the provision of high-quality residential units on a well-served site, the proposal also includes the provision of 2,616 sq.m of public open space situated to the north of the site. This space will be accessible to the future occupants of the development and existing residents in the area, making a positive contribution to the availability of amenities. Additionally, the proposal includes a play area to the northeast of the site for additional communal infrastructure. The proposed amenity spaces promote both active and passive uses and encourage social cohesion by providing spaces for natural social interactions to occur, promoting healthy communities.

At present, it is considered that the site is underutilised due to the proximity to existing services and public transport infrastructure. As such, the proposed development is considered suitable for the site and will support compact development in a considered and sequential manner.

Additionally, we would note that the Guidelines set out 4 no. Specific Planning Policy Requirements which include guidance on separation distances between units, private open space standards for dwellings, car parking provision and cycle parking and storage. These will be detailed below and overleaf, along with the proposal's demonstrated compliance.

SPPR 1 – Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

Within the proposed development, at the closest point, a separation distance of 15.93m has been provided between the eastern elevation of Block A and the western elevation of Block B. Additionally, separation distances of 17.215m have been provided between the eastern elevation of Block B and the western elevation of Block C which ensures the protection of privacy and amenity for the future occupants of the proposed development.

With regard to the surrounding area, Block C of the proposed development ensures a separation distance of 18.335m from the rear (eastern elevation) and the side (western elevation) of no. 68 Churchfields. We would also note that, to the west of the site, a separation distance of 28.120m has been provided between the western elevation of Block A and no. 1 Coolnahinch which is situated adjacent to the site across from Dundrum Road.

The proposed development is situated to the south of Emmett House, a protected structure. This has been a consideration throughout the design process. As such, a separation distance between the northern elevation of Block B and the protected structure of 29.490m has been provided. This allows for the protected structure to remain legible on its own and will, therefore, not be impacted by the proposed development.

Overall, the proposed development ensures adequate separation distances are provided within the site and with regard to the surrounding area, thus protecting existing residential amenity and amenities for future occupants. As such, the proposal has demonstrated compliance with SPPR 1 in this regard.



Figure 40.0 Proposed site layout plan demonstration separation distances between the subject proposal and the surrounding area.

SPPR 2 – Minimum Private Open Space Standards for Houses

The proposed development does not include the construction of houses so this SPPR is not considered relevant.

SPPR 3 – Car Parking

It is a specific planning policy requirement of these Guidelines that:

- (i) *In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) *In accessible locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) *In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

Overall, the development includes the provision of 65 no. car parking spaces. We would note that the Guidelines set out a maximum car parking provision of 1.5 no spaces per dwelling. As there are 129 no. units proposed, we would note that the maximum car parking provision is c. 195 no. spaces. While the proposal results in a car parking provision of 0.5 no. spaces per unit, this is considered acceptable due to the locational context of the subject in close proximity to a number of amenities and services as well as being in close proximity to frequent bus and Luas services. Additionally, we would note that the car parking guidance set out in the Guidelines is maximum in nature, and therefore, the proposal is not required to provide the maximum number of spaces.

As the site is highly accessible and well-served by frequent public transport, it is considered that a reduced car parking provision is acceptable. We would also refer to the Transport Statement prepared by TENT Engineering submitted with this Planning Report which provides further details on transportation to and from the site.

SPPR 4 – Cycle Parking and Storage

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

The following requirements for cycle parking and storage are recommended:

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.*

The proposed development of 129 no. units comprising 72 no. one-beds, 23 no. two bed (3-person) and 34 no. two-bed (4-person) consists of 186 no. bedrooms, which would result in a cycle parking requirement of 186 no. spaces as per the Guidelines. We would note, however, that the Guidelines state that bicycle parking spaces should be provided at a rate of 1 no. space per bedroom in instances of units with no ground-level open space. The proposed development includes 26 no. units with ground-level open space. As such, it is considered that the proposed 180 no. cycle parking spaces provided throughout the site demonstrated compliance with the Guidelines.

Bicycle parking spaces are placed close to the proposed apartment blocks, are overlooked and enclosed to ensure security and protection from weather, save for 6 no. uncovered spaces situated to the north of the site. The development is considered to provide bicycle parking which provides feelings of security for cyclists in keeping with requirements as set out in the Guidelines.

Public Open Space

The Compact Settlements Guidelines provide guidance with regard to public open space. As such, we

refer to Policy and Objective 5.1 – Public Open Space of the Guidelines:

‘It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations’.

The proposed development provides 2,616 sq.m of public open space, which includes 438 sq.m of play area to the northeast of the site. This represents 26.6% of the site area. It is therefore considered that the proposed development demonstrated compliance with regard to public open space. Additionally, we would note that the public open space has been designed and located to be overlooked by the proposed dwellings, promoting passive surveillance and improving security. Additionally, these spaces support both active and passive uses and include play provision for children and seating areas, improving the accessibility and usability of these spaces for a variety of needs. In this regard, it is considered that the proposed development is in keeping with the Guidelines.

6.6 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)

In respect of the apartment development, the proposal has been designed to comply with the standards set out in *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023*. An assessment against each of the applicable standards is provided overleaf:

Housing Mix

The following guidance is provided in relation to housing mix:

*Specific Planning Policy Requirement 1
Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).*

The proposed development provides for 129 no. units of 72 no. one-beds, 23 no. two bed (3-person) and 34 no. two-bed (4-person) units. One-bed units represent 55.81% of the total units and two-beds represent 44% of the total units. In this regard, we would refer to the following set out in the Guidelines:

‘The mix parameters set out above that generally apply to apartments, do not apply to purpose-built student accommodation or to certain social housing schemes, such as sheltered housing. Development Plans may specify appropriate standards for student accommodation’.

As the proposed development will be providing 100% of units for social housing, the proposed development is, therefore, compliant with this Specific Planning Policy Requirement.

Minimum overall apartment floor areas

The overall apartment floor area sizes required for apartment units are as follows:

- Studio apartment 37sq.m
- 1-bedroom apartment 45sq.m
- 2-bedroom apartment (4 persons) 73sq.m
- 3-bedroom apartment (5 persons) 90sq.m

All apartments in the proposed development comply with and exceed the required minimum standards, as shown in Table 1.0 below.

Minimum Overall Required Floor Areas		
Unit Type	Requirement	Area of Proposed Units
One Bedroom	45 sq.m	48-60.6 sq.m
Two Bedroom (3 person)	63 sq.m	66.7-81.1 sq.m
Two Bedroom (4 person)	73 sq.m	74.5 sq.m

Table 4.0 Table showing the required overall floor areas provided for each apartment type.

Section 3.8 of these guidelines set out guidance to achieve good quality development. In this regard, we would refer to the following.

'In the interests of sustainable and good quality urban development, these Guidelines should be applied in a way that ensures delivery of apartments not built down to a minimum standard, but that reflect a good mix of apartment sizes. Accordingly, it is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%)'.

Over 50 no. units which exceed the minimum floor area requirements by 10%. As such, it is considered that the proposal demonstrates compliance with the Guidelines in this regard, and will provide future occupants with a high level of amenity in keeping with the principles of proper planning and sustainable development.

Minimum Aggregate Floor Areas for Living/Dining/Kitchen

Minimum Aggregate Floor Areas - Living/Dining/Kitchen Areas		
Unit Type	Minimum Aggregate Floor Area Required	Floor Areas Proposed
One Bedroom	23sq.m	23-28.7 sq.m
Two Bedroom (3 person)	28 sq.m	28-35.2 sq.m
Two Bedroom (4 person)	30sq.m	30-32 sq.m

Table 5.0 Table showing the minimum aggregate floor areas for living/dining/kitchen areas.

Minimum Aggregate Floor Areas for Bedrooms

Minimum Aggregate Floor Areas - Bedrooms		
Unit Type	Requirement	Floor Area of Proposed Units
One Bedroom	11.4 sq.m	11.4-13.6 sq.m
Two Bedroom (3 person)	20.1 sq.m	20.5-22 sq.m
Two Bedroom (4 person)	24.4 sq.m	24.4 sq.m

Table 6.0 Table showing the minimum aggregate bedroom floor areas.

Dual Aspect Ratios

The 2023 Guidelines require the following in relation to dual aspect apartments as outlined in SPPR 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 in.*

(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.

The proposal accords with the requirement for 50% dual aspect with 50% of all units being dual aspect.

Private Amenity Space

Minimum Floor Area – Private Amenity Space		
Unit Type	Requirement	Floor Area of Amenity Space
One Bedroom	5sq.m	5 sq.m
Two Bedroom (3 person)	6 sq.m	7 sq.m
Two Bedroom (4 person)	7sq.m	7 sq.m

Table 7.0 Table showing the provided private amenity space per apartment type.

All units either achieve or exceed the required private amenity space, thus demonstrating compliance with the Guidelines.

Communal Amenity Space

Minimum Floor Areas – Communal Amenity Space			
Unit Type	Requirement	Total Required	Total Provided
One Bedroom	5 sq.mx72=360	730sq.m	801sq.m
Two Bedroom (3 person)	6 sq.mx29=174		
Two Bedroom (4 person)	7 sq.mx28=196		

Table 8.0 Table showing compliance with communal open space.

Car Parking

With regard to guidance on car parking, we note the following as outlined in the 2023 Guidelines:

‘In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.

*These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops **or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services**’.*

The 129 no. residential units are proposed to be provided with 65 no. car parking spaces at ground floor level. As the site is situated in an accessible urban location, it is considered that a reduced provision of car parking as a result of the site’s proximity to various amenities in the surrounding area and provision of high quality, frequent public transport is acceptable with the site served by Dublin Bus Route Nos. 44/D, 142 and Go Ahead Route No. S4 providing a connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Liffey Valley, Malahide, Sandyford and UCD. These bus routes serve the site from a stop adjacent to the site west along the Dundrum Road. Additionally, the site is within a 13-minute walk of the Milltown Luas Stop providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge. In this regard, it is considered that a reduced car parking provision is acceptable.

6.7 Urban Development and Building Height Guidelines (December 2018)

Under height and density guidelines issued by the Department for Housing, Planning and Local Government in December 2018, there is broad encouragement to increase building heights in urban cores across the country. These guidelines, as published by the Minister under Section 28 of the Planning and Development Act 2000 (as amended) on 7th December 2018, are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

These guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels.

Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns, through enhancing both the scale and density of development. In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. We note that the following commentary from these guidelines:

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

The principle aim of the Urban Development and Building Height Guidelines is to identify the scope for the appropriate increase in height of both existing and undeveloped sites within central urban areas to allow for the consolidation and sustainable development of existing urban spaces and prevent the need for further sprawl.

This document is designed to aid the implantation of the compact urban growth envisioned in Project Ireland 2040 and the National Planning Framework. The document further explains the need for a proposed development to fulfil the following criteria:

- *The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*
- *On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.*

Under this guidance, it is our opinion that the proposed development on site that seeks to provide a maximum height of part 5, part 6 storeys, relative to the context of the site, is in line with national policy and allows for compact growth within the built-up area of Dublin as per the guidance. It is considered

that the subject site is situated at a suitable location for development at a higher density and increased height than that as established in the area immediately surrounding the site. While this is the case, we would note that the development of the design of the proposal has considered the context of the site and ensures a proposal which protects residential and visual amenity while providing future occupants with a high level of amenity.

We would draw particular attention to the placement of blocks on the site, noting Block C to the east of the site which is a block of 2-storey duplex units adjoining the Churchfields residential development, protecting existing residential amenity. The taller blocks (Blocks A and B) are proposed to be situated towards the west and centre of the site, respectively. It is considered that the placement of these blocks ensures the protection of amenity of dwellings surrounding the site. With particular regard to the dwellings to the west of the site, existing residents have been considered and will benefit from further separation distances provided by the Dundrum Road, providing transition space between the site and neighbouring sites. Photomontage images have been prepared by 3D Design Bureau which demonstrates the scheme's suitability for the site in the context of the surrounding area.

6.7.1 Development Management Criteria

Section 3.2 'Development Management Criteria' of the guidelines states that applicants shall demonstrate, to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the criteria for development at a set of relevant scales.

6.7.1.1 At Scale of the Relevant City / Town

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

As stated previously, the site is well served by public transport with high capacity comprising of both bus and Luas services. Along Dundrum Road, Dublin Bus Route Nos. 44/D, 142 and Go Ahead Route No. S4 provide a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Liffey Valley, Malahide, Sandyford and UCD. Additionally, the site is within a 13-minute walk of the Milltown Luas Stop, providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge.

Additionally, as the site is served by the Green Line Luas, connections to the Red Line Luas are available in the city centre, providing further connections to Heuston and Connolly train stations, ensuring occupants have a good link to other modes of public transport.

6.7.1.2 At Scale of the District / Neighbourhood / Street

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

The high standard of architectural design achieved in the current proposal has had due regard to the guidance contained within national planning policy in relation to the densification of brownfield sites. The proposal has been designed so as to ensure no undue impacts on existing residential amenity will occur as a result of the development, having regard to the results of the various analysis documents prepared in respect of this application. Additionally, due to the locational context of the subject site and the proposed layout of the development, minimal impact on daylight access for existing residents in the area is anticipated. This is evidenced by the daylight and sunlight assessment prepared by 3D Design Bureau submitted with this Planning Report. In addition to this, it is considered that the proposed development would make a positive contribution to the urban neighbourhood and streetscape by adding visual interest through the high-quality design.

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

The facades of each block are varied and use a variety of materials to provide visual interest and to break up perceived massing. The development integrates well into the surrounding environment and

avoids a proposal which appears overbearing in scale. Additionally, massing has been considered to avoid long interrupted walls of building in the form of slab blocks, enhancing visual amenity.

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).

Communal and public spaces proposed will be overlooked by the blocks within the development which are considered to provide a sense of enclosure, comfort and safety. Additionally, the active frontage provided by the proposed blocks assists with passive surveillance and vitality, enhancing feelings of safety. The proposed development with heights up to part 5, part 6 storeys is considered to be in keeping with the principles of good urban design, integrating into the surrounding area through considering the context of the site and providing for overlooking of proposed communal and open spaces. Additionally, the Flood Risk Assessment of the site prepared by TENT Engineering revealed that the site is situated within Flood Zone C. Furthermore, SuDS infrastructure has been provided throughout the site, therefore mitigating potential pluvial flooding impacts.

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

The site is currently undeveloped and does not contribute to the legibility of the surrounding area. The proposed development, however, contributes to the legibility of the surrounding area by providing for the construction of 129 no. dwellings on an underutilised site, incorporating a built form and massing which considers the context of the site and neighbouring properties to ensure the protection of existing amenities and to provide future occupants with a high level of amenity. The layout ensures sufficient setbacks to avoid overlooking and overbearing impacts on neighbouring properties. Overall, the development will create an identity for the site and make a positive contribution to the area by providing public amenity spaces which can be used by residents of the surrounding areas.

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

The subject proposal is located on residentially zoned lands and, as such, is limited in the extent of land uses which may be provided. It is considered that the extent of residential accommodation achieved under the subject proposal allows for the efficient use of the site. With regards to dwelling typology, it is considered that the provision of a variety of units will positively contribute to the vitality and variety of unit types in the area.



Figure 41.0 Photomontages of the proposed development as viewed from Dundrum Road.

6.7.1.3 At Scale of the Site / Building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

It is considered that the massing and form of the proposed blocks have been appropriately organised to maximise access to natural daylight while protecting the existing residential amenities of neighbouring properties, ensuring retained daylight access. We would note that Block C, situated to the east of the site, is two-storeys in height, where the subject site adjoins the Churchfields residential development. Further to this, Blocks A and B, situated to the centre and west of the site, which are part 5, part 6 storeys in height, have been scaled and situated on the site to ensure appropriate separation distances from neighbouring properties, protecting daylight and visual amenities. In this regard, it is considered that the proposed development has been appropriately scaled to protect the amenities of existing properties in the surrounding area.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

50% of the units are dual aspect. Furthermore, due to the orientation of the proposed development, units which are not dual aspect will receive high levels of daylight access throughout the day, demonstrating compliance with the above requirements.

It is thus considered that appropriate and reasonable regard has been taken with regard to the quantitative performance approach to daylight provision within the proposed scheme. The proposal contributes to the comprehensive urban regeneration of the immediate area, allowing for the succinct and contemporary upgrade of a prominent yet underutilised site which commands a significant viewpoint.



Figure 42.0 Photomontage of the proposed development as viewed Churchfields.

6.8 The Planning System and Flood Risk Management: Guidelines for Planning Authorities

The purpose of the Planning System and Flood Risk Management: Guidelines for Planning Authorities is to ensure that flood risk is a key consideration in the preparation of Development Plans and Local Area Plans and when assessing planning applications. The Guidelines set out a number of core objectives as listed below:

- *Avoid inappropriate development in areas at risk of flooding;*
- *Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;*
- *Ensure effective management of residual risks for development permitted in floodplains;*
- *Avoid unnecessary restriction of national, regional or local economic and social growth;*
- *Improve the understanding of flood risk among relevant stakeholders; and*

- *Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.*

The proposed development has considered the guidance set out in these Guidelines to ensure a proposal which avoids flooding risk to ensure the protection and longevity of the proposed development. We would refer to the Flood Risk Assessment prepared by TENT Engineering submitted with this Planning Report which highlights the suitability of the site for the proposed development, ensuring that this site will not be impacted by flooding.

6.9 Childcare Facilities: Guidelines for Planning Authorities

Government policy relating to childcare aims to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community.

These Guidelines for Planning Authorities on Childcare Facilities 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 following definition of Childcare is included within the Guidelines:

'In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.'

Appendix 2 of the 'Childcare Guidelines for Planning Authorities' establishes an indicative standard of one childcare facility per 75 dwellings in new housing schemes. Based on this requirement, 2 no. childcare facilities would be required as part of the proposal to cater for the population arising from the proposed scheme. It also states that the threshold for provision should be established having regard to the existing location of facilities and the emerging demography of the area where new housing is proposed.

The recommendations provided within the Guidelines must be considered in the context of the Sustainable Urban Housing: Design Standards for New Apartments (2023), which state that:

*'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision** and subject to location, this may also apply in part or whole, to units with two or more bedrooms.'*

The proposed development of 129 no. units comprising a mix of 72 no. one-beds, 29 no. two-beds (three-person) and 28 no. two-beds (four-person) is considered to have 57 no. units which are suitable to account for childcare facility requirements as we refer to the Design Standards for New Apartment Guidelines which note that one-bedroom units should not generally be considered to contribute to a requirement for any childcare provision. In this regard, it is considered that the proposal which does not include childcare facilities is considered suitable.

In addition to the above, we would refer to Section 2.4 of the Guidelines set out the appropriate locations for childcare facilities, stating that: -

‘Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments.’

Sufficient flexibility exists under the Guidelines, to ensure that childcare facilities are not required in instances where they are not necessarily due to local circumstances. The current provision of childcare in the area, the nature of emerging new communities and current demographic trends are factors which must be considered when determining the appropriate level of childcare facilities required in an area. From a review of the surrounding area, it is considered that there is sufficient childcare to support new residential development.

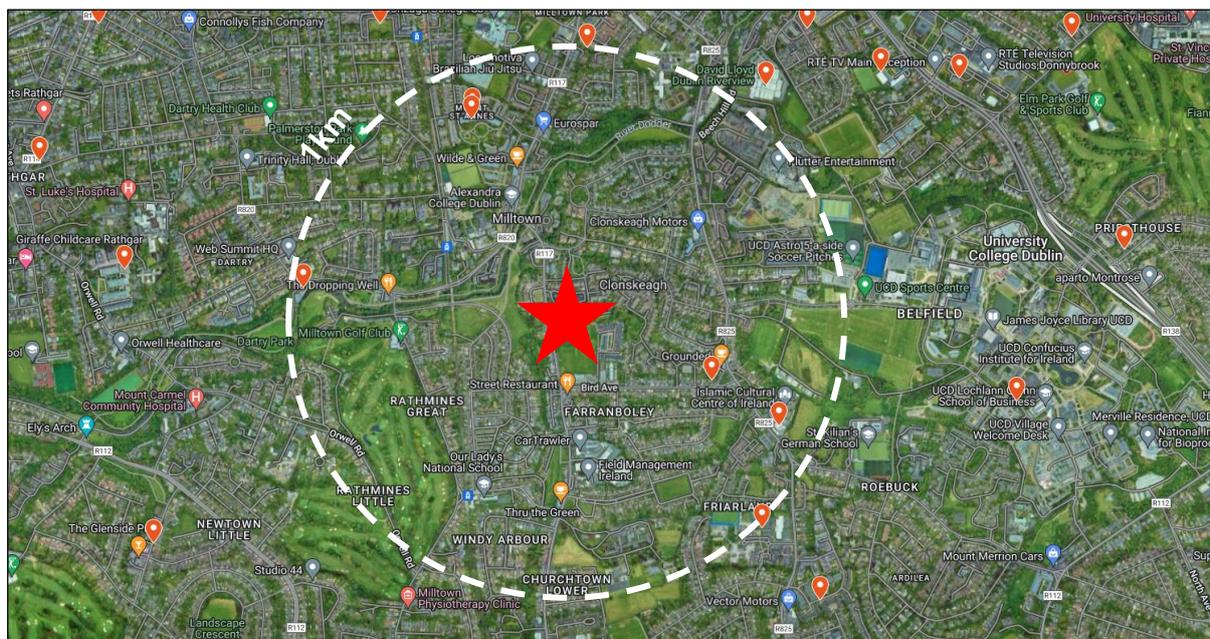


Figure 43.0 Aerial image of Tusla Early Years Services (orange markers) in proximity to the subject site (red star).

Tusla Number	Service Name	Age Profile	Service Type	No. Of Children Service Can Accommodate
TU2015DY324	Minerva Montessori	2 - 6 Years	Full Day	65
TU2015DY310	Daisychain Montessori & Childcare	0 - 6 Years	Full Day, Part Time, Sessional	73
TU2015DY313	Giraffe Childcare Milltown	0 - 6 Years	Full Day	116
TU2015DR136	Little Feat	0 - 6 Years	Full Day, Part Time, Sessional	52
TU2015DR145	Flower Childcare Clonskeagh	1 - 6 Years	Full Day	23
TU2015DR119	The Grove Pre School	2 - 6 Years	Full Day, Part Time, Sessional	44

Table 8.0 Details of Tusla Early Years Services within 1km of the subject site.

7.0 Local Planning Policy Context

The following section will review the local planning policy context, particularly the Dún Laoghaire-Rathdown County Development Plan 2022-2028.

7.1 Dún Laoghaire County Development Plan 2022-2028

Adopted on 21st April 2022, the Dún Laoghaire-Rathdown County Development Plan guides future growth and development in the County, setting out the policy objectives and the overall strategy for the proper planning and sustainable development of the County over the plan period from 2022-2028. The overarching vision for the Dun-Laoghaire-Rathdown administrative area as stated within the Plan is to:

‘embrace inclusiveness, champion quality of life through healthy placemaking, grow and attract a diverse innovative economy and deliver thus in a manner that enhances our environment for future generations’

Referring to the Core Strategy and, in particular, Section 2.3.3 of same, it is noted that in a healthily performing housing market, residential output and housing completions should be planned to increase in line with population growth. The Development Plan notes that in the census period between 2011-2016, the population of Dun Laoghaire-Rathdown increased by **11,757 no. persons** whilst housing stock only increased by **1,066 no. units**, representing a significant disparity. The Plan goes on to state that the evidence suggests a period of prolonged under-supply which has resulted in ‘pent-up’ housing demand. This under-supply is further evidenced by the increase in household size experienced in the area between 2011-2016.

Having regard to the above, it is noted that the proposed development provides for an overall increase in the number of units comprised within serviced and well-located lands that are within close proximity to a number of public transport services. It is therefore considered that the proposed intensification of the site will increase housing output in the area and will aid in meeting this unmet demand prevalent over the past years, providing a variety of housing options and opportunities for those with varying housing needs.

7.1.1 Zoning Objective

The site is zoned Objective ‘A’ in the Dún Laoghaire-Rathdown County Development Plan 2022- 2028 with the following objective:

‘to provide residential development and improve residential amenity while protecting the existing residential amenities’.

This zoning objective and the general provisions of the Development Plan permit residential development subject to suitable design proposals and the protection of adjacent residential amenity. In this regard, it is considered that the proposed development has achieved appropriate separation distances from existing dwellings within the immediate vicinity so as to not compromise residential amenity. Furthermore, it is considered that a high standard of accommodation will be provided as a result of the proposal, and as such, the development is appropriate in the context of the identified zoning objective. The proposed development has achieved appropriate separation distances from existing dwellings within the immediate vicinity of the site so as to not compromise residential amenity. Furthermore, it is considered that a high standard of accommodation will be provided as a result of the proposal, and, as such, the development is appropriate in the context of the identified zoning objective.



Figure 44.0 Extract from Zoning Map showing the subject site (outlined in red) zoned objective 'A' in the Dún Laoghaire-Rathdown County Development Plan 2022-2028

As confirmed by the map included in Figure 44.0, residential development is permitted in principle on the site. Furthermore, it is important to note that there are no protected structures on the site nor is the site located in an Architectural Conservation Area (ACA). It is noted that Emmet House situated to the north of the site is a protected structure. This has been considered throughout the design process and the architectural heritage and contributions of this structure will not be impacted by the proposed development.

The general objectives set out within the current Development Plan also aim to provide a measure of protection from unsuitable new development or certain 'bad neighbour' developments that would be incompatible with the overall residential function of the area. It is considered that in the context of the site, the proposed development is of an appropriate form, massing and design, consistent with Zoning Objective A.

We would also note that the site comprises an 'INST' objective. The proposal has been developed to consider the specific requirements set out in the Development Plan for lands with an INST objective. In this regard, we would note the following policy objective in the Development Plan:

Policy Objective PHP21: Development on Institutional Lands

It is the Policy Objective to retain the open character and/or recreational amenity of land parcels that are in institutional use (such as religious residential or other such uses) and are proposed for redevelopment.

Further to this, we would note the following for the development of these lands where no demand for an alternative institutional use is evident or foreseen:

'Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the zoning objectives of the area being adhered to and the open character and recreational value of the lands being retained'.

As noted, the layout of the development has been designed to ensure the protection of the open character and recreational value of the lands are protected. The proposed blocks are situated towards the periphery of the site and a high quantum of open space is provided to future occupants of the development and existing occupants of the surrounding area. In this regard, it is considered that the proposal has been suitably designed and scaled to be in keeping with Development Plan guidance for the zoning of the site and for lands with an INST objective.

We would also note the following criteria set out in the Development Plan with regard to the development of lands with an INST objective:

- *A minimum of 25% of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space. In determining the area to which the “INST” objective applies the planning authority shall have regard to the existing and historical land use and associations between land uses, and the extent to which any lands contribute to the open character and setting of the core institutional function.*

We refer to the landscape plans prepared by RMDA Landscape Architects submitted with this Planning Report which provides details on the designation of open space for the subject site. The overall site comprises 9,826.3 sq.m and public open space of 2,616 sq.m is provided, representing 26.6% of the total site area. This space, situated to the north of the site, is accessible and usable, supporting both active and passive uses. The space also includes a play area for children, improving the community infrastructure in the surrounding area.



Figure 45.0 Open space designation.

- *This provision must be sufficient to maintain the open character of the site with development proposals structured around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council (refer also to Section 12.3.7.10).*

The proposed development has been laid out to ensure the protection of the existing context of the area surrounding the site. The layout, massing and placement of blocks have considered the context of the site and the INST objective of the lands to ensure a layout which is considered to integrate into the site. Works to the boundary wall of the site include the provision of a pedestrian and vehicular entrance to the northwest of the site and a pedestrian entrance to the southwest, both from Dundrum Road. Additional works include the removal of part of the boundary wall and replacement with fencing to open up the site and allow for an interaction between the street and the proposed development. While largely retaining the existing features of the site, it is considered that these alterations allow for increased activity and overlooking which represent a positive interaction between the site and the public realm.

As noted, the public open space provision comprises 26.6% of the site area, situated to the north of the site which adjoins the site of Emmet House. In this regard, it is considered that the open character of the site will be maintained.

While it is noted that tree removal works are proposed to facilitate the proposed development, as outlined in the Arboricultural Documents prepared by CMK Hort & Arb Ltd. The trees impacted by the proposal are situated to the south of the site. In response to this, we would refer to the landscape masterplan prepared by RMDA Landscape Architects which highlights the extensive tree planting proposed with the subject development. In this regard, it is considered that the works proposed will ensure the protection of the character of the site and the surrounding area.

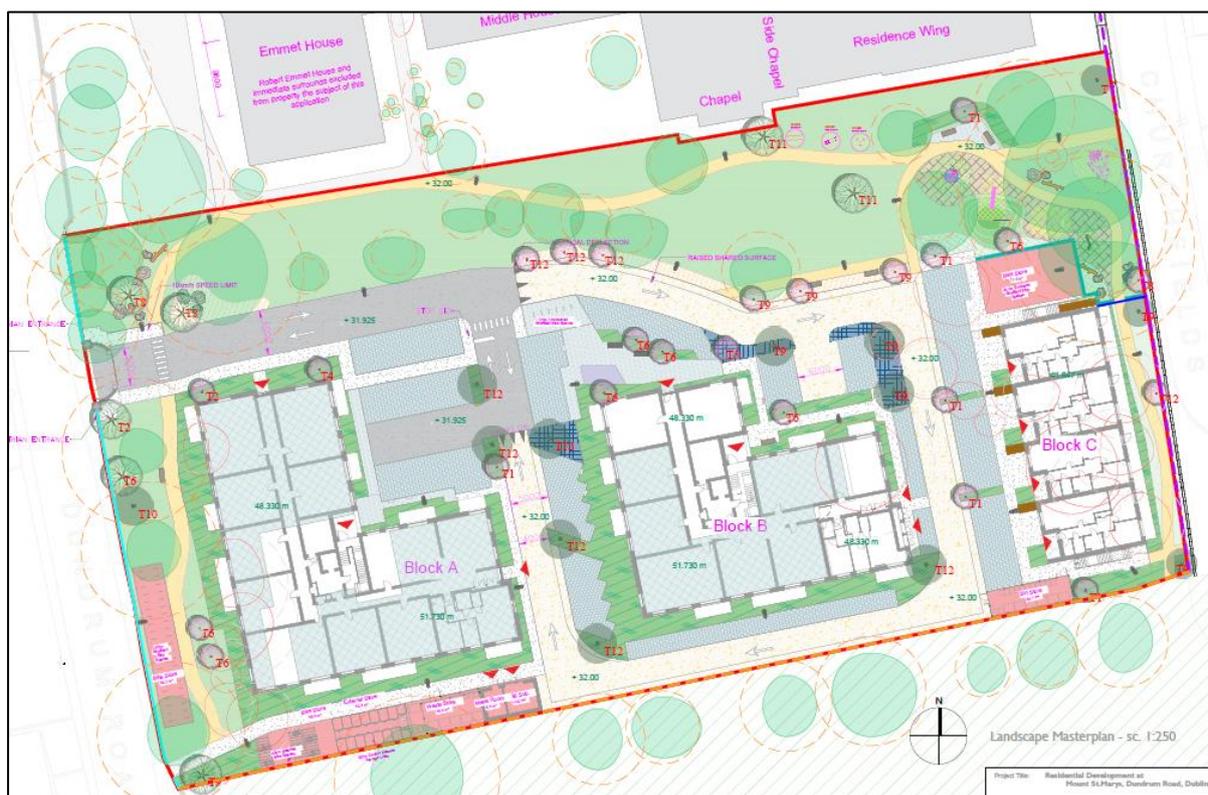


Figure 46.0 Proposed landscape masterplan.

- *The provision must be sufficient to maintain and/or improve the recreational value of the site particularly with regard to adding to the sustainable neighbourhood infrastructure of the area.*

It is not considered that the site has recreational value or provides neighbourhood infrastructure to the surrounding area. The site is situated to the north of the CUS Rugby Grounds, however, the subject site does not form part of these lands, is currently vacant and therefore underutilised. The proposal incorporates a significant quantum of public open space which includes play areas, and has been designed to promote active and passive uses, making the space usable and accessible for a variety of needs. In this regard, the proposed open space provision associated with the site will improve the recreational value of the site and add to the sustainable neighbourhood infrastructure of the area.

- *Any proposal for development other than that directly related to an existing social infrastructure and/or institutional uses, will require the preparation and submission of a masterplan.*

A masterplan has been prepared by Reddy Architecture and Urbanism and is submitted with the architecture pack. This masterplan highlights the development potential of the site to the north of the subject site which currently comprises Emmet House. With regard to the CUS Rugby Grounds lands to the south, it is considered that the lands are currently used as their intended purpose as rugby pitches and it is therefore not considered that additional development is viable on these lands at this time.

- *Average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.*

The proposed development of 129 no. units on a 0.98263 ha site results in a unit density of 131 no. units per hectare. While the Development Plan notes that lands with an INST objective should provide for densities in the region of 35-50 units per hectare, we would note that guidance also states that higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character of the site.

The proposal provides for a public open space quantum of 26.6% of the site area, therefore protecting the open space character of the site. In its current form, it is not considered that the site has recreational amenity and therefore, the proposal will provide this for future occupants of the development and existing residents in the surrounding area.

Regarding the proposed density, we would refer to the guidance set out in the Sustainable Residential Development and Compact Settlements Guidelines which aims to support the appropriate placement of increased densities on well-served sites. This represents a compact and consolidated form of development which supports the sustainable growth of Dublin, utilising land which is well-served and centrally located. Specifically, we would note that the site is considered to be within the City - Suburban/Urban Extension category of Table 3.1 – Areas and Density Ranges Dublin and Cork City and Suburbs. Under this category, we note the following with regard to density:

*'It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that **densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations** (as defined in Table 3.8).'*

It is noted that *'lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services'* are considered to constitute an *'accessible suburban/urban extension location'*. In this regard, we would note that Go-Ahead Route No. S4 operates along Dundrum Road to the west of the site, with the site adjoining a stop which is served by this route. With a 10-minute peak frequency, it is considered that the site can be categorised as an accessible suburban/urban location, and we would note that densities of up to 150 units per hectare are open for consideration at the subject site.

The proposal, which intends to provide 129 no. units on a 0.98263 ha site results in a density of 131 no. units per hectare. Considering this proposed density with the considered design and layout of the proposal having due regard for existing residential amenities of neighbouring properties, it is considered that the site can suitably accommodate the proposal and is therefore compliant with Development Plan guidance and that as set out in the Sustainable Residential Development and Compact Settlements Guidelines.

7.1.2 Density

One of the Five Strategic County Outcomes included in Table 1.4 of the Development highlights the benefit of locating higher-density development on serviced land within the built-up footprint of the County:

Creation of a Compact and Connected County

One of the best ways to transition to a climate resilient County is to consolidate development within the existing urban footprint thus making best use of land. Sustainable planning policy has long been underpinned by the matching of land use and transport policies so that denser development takes place close to good quality public transport options and supporting services. This will allow those living, working and visiting the County easy access to amenities and services by way of high-quality public transport and the softer modes of walking and cycling.

Further to this, we would note the following statements and policies related specifically to residential density and housing stock, as per Dún Laoghaire-Rathdown County Development Plan 2022-2028.

Policy Objective PHP18: Residential Density

Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.'

Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.

Further to this, we would note the following Development Plan guidance with regard to unit density:

'Where a site is located within circa 1 kilometre pedestrian catchment / 10 minute walking time of a rail station, Luas line, Core/Quality Bus Corridor and/or 500 metres / 5 minute walking time of a Bus Priority Route, and/or 1 kilometre / 10 minute walking time of a Town or District Centre, higher densities at a minimum of 50 units per hectare (net density) will be encouraged'.

The subject site is within 500 metres of the Milltown Luas stop which is a c. 13-minute walk from the site. In this regard, it is considered that a minimum density requirement of 50 units per hectare should apply. Due to the design and layout of the proposal which protects existing residential amenity while providing future occupants with high levels of amenity, it is considered that the proposed density of 131 no. units per hectare is appropriate.

Policy Objective PHP20: Protection of Existing Residential Amenity

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.

It is evident that Dún Laoghaire-Rathdown County Council supports developments which promote higher residential density in the existing built-up footprint as this form of development both improves, conserves and consolidates the housing stock within the County. It is submitted that the proposal achieves these objectives and that the site is of appropriate size to allow for an increased quantum of residential accommodation. Due to the locational context of the site, the availability of frequent public transport and proximity to amenities and services, it is considered that the proposed density of 131 no. units per hectare allows for a more compact urban form and represents a sustainable use of the site.

It is acknowledged that Section 4.3.1 of the Plan proceeds to state that 'as a general rule the minimum default density for new residential developments in the County (excluding lands in Zoning Objectives 'GB', 'G' and 'B' shall be 35 units per hectare (net density). It is also provided that *'where a site is located within circa 1 kilometre pedestrian catchment / 10 minute walking time of a rail station, Luas line, Core/Quality Bus Corridor and/or 500 metres / 5 minute walking time of a Bus Priority Route, and/or 1 kilometre / 10 minute walking time of a Town or District Centre, higher densities at a minimum of 50 units per hectare (net density) will be encouraged'*. In this context, it is considered that the subject site is well serviced by frequent public transport infrastructure along Dundrum Road and as such, increased residential densities, such as those proposed, are necessary in order to make the most efficient use of zoned and serviced lands.

With a density figure of 131 no. units per hectare, it was integral throughout the design process to ensure that a proposal could be facilitated on site which considers the context of the surrounding area, protecting existing residential amenities. In this regard, the layout of the proposal provides for lower heights of two storeys to the east of the site where the site adjoins Churchfields and provides height of part 5, part 6 storeys towards the centre and west of the site. In this regard, it is considered that the distance between Block A, to the west of the site, and neighbouring residential properties are provided with ample separation distances and a buffer/transition zone to ensure that there are no negative impacts on residential amenity due to height. It is therefore considered that the proposed development includes heights and densities, which ensure the protection of residential amenities and are considered to be appropriate for the site.

7.1.3 Infill Development

The proposed development is representative of infill development as it constitutes the process of developing an under-used parcel of land on a large site within an existing urban area that is already developed. We note the following guidance for infill development as per Section 12.3.7.7 of the Development Plan:

'New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings'

The proposed development has been specifically designed to protect residential amenity in the area and to make use of an underutilised site, providing much-needed housing in an accessible and well-served location. It is intended to retain existing boundary features, where possible, to limit the visual impact of the development save for the addition of the pedestrian and vehicular entrance to the northwest of the site and the pedestrian entrance to the southwest of the site from Dundrum Road. Additionally, we would note that as per the landscape proposal prepared by RMDA Landscape Architects and Consultants, an extensive tree planting proposal is provided to ensure that the character of the site is retained and visual amenity is protected. The site is considered suitable for development given the locational context and access to amenities and frequent public transport, as well as the design of the proposal, which has considered the context of the surrounding area. In this regard, the proposal is considered to represent a high-quality infill development, protecting existing amenities and providing much-needed housing.

Further to this, the proposal is considered to contribute to the surrounding area as the site does not currently have amenity value. The proposal includes a high quantum of public open space situated to the north of the site and includes dedicated play areas. The public open space supports both passive and active uses and is considered to enhance community amenities in the area, making the lands usable and accessible. As such, it is considered that the proposal makes a positive contribution to the surrounding area.

7.1.4 Appearance and Character of the Area

It is a vision of the Dún Laoghaire-Rathdown Development Plan 2022–2028. To ensure that all new development and redevelopment proposals in the County adhere to the principles of good urban design and contribute to the delivery of a sense of place, through the promotion of a high-quality built environment utilising considered design and development standards. Furthermore, it is Council policy to promote high-quality design and layout in new residential development.

Policy Objective PHP35: Healthy Placemaking

- *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.*

The proposed development will provide a high standard of living accommodation for future residents while ensuring the ongoing protection of the residential amenity of adjoining properties and not harming the character or appearance of the area. Due to the layout and massing of the proposed blocks and the palette of materials, we would highlight that the proposal will integrate into the surrounding area and align with the principles of healthy placemaking. We would refer to the photomontage images included in Figure 47.0 which highlight how the proposal will be screened along Dundrum Road, protecting the appearance and character of the area. It is submitted that the proposed development represents the orderly planning and sustainable development of the area.



Figure 47.0 Photomontages of the proposed development as viewed from Dundrum Road.

7.1.5 Private Open Space

The Development Plan requires that all apartment units shall have direct access to their own minimum area of private open space, either in the form of a balcony or a patio area. It is considered that private open space associated with apartments and duplexes is important to ensure a suitable level of amenity for occupiers. The proposed development is in accordance with Section 12.8.3.3 of the Dún Laoghaire-Rathdown Development Plan 2022 - 2028 which specifically relates to private open space.

Each of the residential units proposed as part of the proposed development are afforded sufficient areas of private open space which meet and/or exceed the minimum requirements as indicated in the Dún Laoghaire-Rathdown Development Plan 2022 – 2028.

Type/No. of bedrooms	Minimum square metres
Studio	4 sq. m.
One	5 sq. m.
Two (3 persons)	6 sq. m.
Two (4 persons)	7 sq. m.
Three	9 sq. m.
Four +	12 sq. m.

Figure 48.0 Table 12.11 – Private Open Space Standards of the Development Plan.

Minimum Floor Area – Private Amenity Space		
Unit Type	Requirement	Floor Area of Amenity Space
One Bedroom	5sq.m	5 sq.m
Two Bedroom (3 person)	6 sq.m	7 sq.m
Two Bedroom (4 person)	7sq.m	7 sq.m

Table 9.0 Table showing the provided private amenity space per apartment type.

7.1.6 Communal Open Space

Section 12.8.3.2 of the Development Plan outlines the quantum for the provision of communal open space within a development. The proposed development of 129 no. units comprising a mix of 72 no. one-beds, 29 no. two-beds (three-person) and 28 no. two-beds (four-person) generates a requirement of 730 sq.m. Communal open space is provided throughout the site however, for clarity, a breakdown of the space provided to each block is provided in Table XX.0.

Unit Type	Minimum Area per Unit
Studio	4 sq. m
One Bed	5 sq. m
Two bedrooms (3 bed)	6 sq. m
Two bedrooms (4 bed)	7 sq. m
Three bedrooms	9 sq. m
Four +	12 sq. m.

Figure 49.0 Table 12.9 – Communal Open Space Standards of the Development Plan.

Minimum Floor Areas – Communal Amenity Space			
Unit Type	Requirement	Total Required	Total Provided
One Bedroom	5 sq.m x 72 = 360	730sq.m	801sq.m
Two Bedroom (3 person)	6 sq.m x 29 = 174		
Two Bedroom (4 person)	7 sq.m x 28 = 196		

Table 10.0 Table showing compliance with communal open space.

7.1.7 Public Open Space

While the site is zoned objective ‘A’, we note that there is an INST objective on the lands. Section 12.8.3.1 of the Development Plan provides guidance on the quantum of communal open space to be provided for residential development and notes that 25% of the site area should be provided as communal open space. In this regard, we would note that 26.6% of the site area will be provided as public open space, in compliance with the requirements of the Development Plan with regard to public open space requirements.

Location:	Public Open Space Standards (minimum):
Residential Development in new residential communities as shown in the Core strategy – figure 2.9.	15% (of site area)
Residential Development in the existing built up area.	15% (of site area)
Institutional and Redevelopment of SNI use	25% (of site area)

Figure 50.0 Table 12.8 – Public Open Space Standards of the Development Plan.

7.1.8 Parking Standards

Car Parking

Car parking standards provide a guide on the number of required off-street parking spaces acceptable for new developments. In essence, the purpose of parking standards is to ensure that a considered and appropriate level of parking is provided to serve new development.

Land Use		Zone 1 MTC Areas and Blackrock	Zone 2 Near Public Transport	Zone 3 Remainder of County (non-rural)	Zone 4 Rural
Houses:	Criterion	Maximum	Standard	Standard	Standard
Apartments and Sheltered Housing:					
Apt 1 bed	unit	1	1	1*	Case by Case
Apt 2 bed	unit	1	1	1*	Case by Case
Apt 3 bed +	unit	1	2	2*	Case by Case

Figure 51.0 Table showing Car Parking Zones and Standards as per Dún Laoghaire-Rathdown County Development Plan 2022- 2028.

The proposed residential development provides for 65 no. car parking spaces. While the provided quantum falls short of the indicative standards as set out within the Dún Laoghaire-Rathdown Development Plan, it is considered to be an appropriate car parking provision, given the context of the site in close proximity to public transport services (bus and Luas). Additionally, we note the following with regard to a deviation from these standards:

'In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 or may consider that no parking spaces are required'.

The site is served by bus stops adjacent to the site along Dundrum Road. In this regard, frequent public transport with a peak capacity of 10 minutes will provide future occupants with high levels of accessibility as it is noted that Dublin Bus Route Nos. 44/D, 142 and Go Ahead Route No. S4 provides a connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Liffey Valley, Malahide, Sandyford and UCD. Additionally, the site is within a 10-minute walk of the Milltown Luas Stop providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge. The proposed car parking quantum is considered acceptable.

The Development Plan sets out a list of criteria for the assessment of proposals that include a deviation from the car parking standards set out in Table 12.5 of the Development Plan. These are listed below and overleaf with a response to each provided below this.

- *Proximity to public transport services and level of service and interchange available.*

As noted, the subject site is served by Dublin Bus Route Nos. 44/D, 142 and Go Ahead Route No. S4 providing a connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Liffey Valley, Malahide, Sandyford and UCD. Additionally, the site is within a 13-minute walk of the Milltown Luas Stop providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge. The site is considered to be well-served by frequent public transport to provide future occupants with a high level of amenity.

- *Walking and cycling accessibility/permeability and any improvement to same.*

There are 2 no. entrances proposed along Dundrum Road to the west of the site. The entrance to the northwest of the site supports vehicular, cyclist and pedestrian access and the entrance to the southwest supports pedestrian access. Furthermore, it is noted that there is a pedestrian entrance gate to the northeast of the site which connects the site to the Churchfields residential development to the east. This entrance is proposed to be as part of the development with paving provided throughout the site to allow access to this. In this regard, the entrances will enhance the permeability of the surrounding area while allowing for the subject site to have access to surrounding areas.

- *The need to safeguard investment in sustainable transport and encourage a modal shift.*

The proposed development is well-served by public transport. As such, this allows for public transport to be a viable option for movement and an alternative to private car use. Furthermore, we note that 180 no. cycle parking spaces are provided throughout the site. This provision of secure cycle parking is considered to encourage a modal shift which allows residents sufficient opportunity to keep bikes on site.

- *Availability of car sharing and bike / e-bike sharing facilities.*

Cargo bike and e-bike spaces are provided throughout the site.

- *Existing availability of parking and its potential for dual use.*

There is no existing car parking available on site.

- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*

Due to the accessibility of the site and availability of frequent public transport in close proximity to the residential development, it is considered that a reduction in car parking is appropriate.

- *The range of services available within the area.*

There are a variety of amenities and services in the surrounding area which includes education, sports, café, restaurants and religious institutions within walking distance of the site.

- *Impact on traffic safety and the amenities of the area.*

We refer to the Autotracking and Sightlines drawings prepared by TENT Engineering which accompany this Planning Report which provide details of the safe access and egress with regard to the site. In this regard, it is considered that there will be no impact on traffic safety. Sufficient visual distances are provided to protect pedestrians using the footpath along Dundrum Road and those accessing or exiting the subject site. The proposed development will have no impact on the amenities of the area. It is considered that the proposal enhances amenities due to the provision of high levels of public open space which includes a dedicated play area, providing the surrounding area with additional community infrastructure.



Figure 52.0 Sightlines achieved from the entrance to the proposed development.

- *Capacity of the surrounding road network.*

We refer to the Traffic and Transport Assessment prepared by TENT Engineering accompanying this Planning Report which details the capacity of the surrounding road network and notes that it is deemed to have sufficient capacity to facilitate the proposed development.

- *Urban design, regeneration and civic benefits including street vibrancy.*

The proposal incorporates proper urban design principles into the layout of the proposed blocks on site, with considerations made for how these interact with one another and the surrounding area. Considering the context of the site and surrounding area, Block C is located to the east of the site. This two-storey block is opposite the Churchfields residential development, comprising dwellings of two storeys in height. It is therefore considered that Block C will have no impact on the existing residential amenities.

Within the site, Blocks A and B are proposed to the west and centre of the site, respectively. These blocks at part 5, part 6 storeys in height are L-shaped and ensure sufficient separation distances to protect the amenities of future occupants. As such, we would note a distance between the 5-storey element of Block B and Block C of 18.195 m which is considered sufficient to protect the amenities of future occupants of these blocks. Additionally, we would note that no private amenity spaces are proposed along the façade of Block B closest to Block C which protects privacy.

Block A, situated to the west of the site, benefits from separation distances provided by the setback from the boundary of the site at 12.357 m and the Dundrum Road, ensuring significant separation distances from residential properties to the west of the site, avoiding impacts regarding overlooking, therefore protecting privacy. Furthermore, these separation distances protect daylight access, thus representing a proposal which has considered the context of the surrounding area and is considered to integrate into the context of the site.

We would also note that, at present, the site does not facilitate overlooking Dundrum Road. As overlooking is only provided on the western side, at present, this can reduce feelings of comfort and safety. As such, it is considered that the passive surveillance provided by Block A along Dundrum Road will increase feelings of safety and comfort, representing a positive interaction with the public realm.

- *Robustness of Mobility Management Plan to support the development.*

A Mobility Management Plan (MMP) has been prepared by TENT Engineering and is submitted with this Planning Report. This MMP sets out how the proposed development of 129 no. units will be served by 65 no. car parking spaces while setting out how residents will be encouraged to use alternative transport modes which include cycling, walking and public transport in an effort to reduce car use. Due to the availability of public transport and a high quantum of cycle parking provided, it is considered that there are suitable alternative transport options, which is outlined further in the MMP where it is evidenced that the proposed development can be supported.

- *The availability of on street parking controls in the immediate vicinity.*

Limited on-street parking is available along Millmount Terrace/Dundrum Road to the west of the site. Bollards are in place to prevent overspill.

- *Any specific sustainability measures being implemented*

Sustainable urban Drainage Systems (SuDS) have been incorporated into the development, which includes green-blue roofs, permeable surfaces, tree pits, soakaways and petrol interceptors, ensuring that surface water is managed accordingly, protecting the site and surrounding area from pluvial flooding as a result of the development.



Figure 53.0 Green/Blue Roof Layout of the proposed development.

As the proposal has demonstrated compliance with the aforementioned criteria as set out with regard to deviations from parking standards, the quantum of car parking proposed is considered acceptable

for the development and suitable for the area due to the availability of public transport in proximity of the subject site as well as the availability of amenities and services in the area.

Cycle Parking

Section 12.4.6 of the Development Plan provides guidance regarding cycle parking for new development within the County. This guidance is to be read in conjunction with the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018). The proposed cycle parking has demonstrated compliance with both guidance documents.

It is a vision of Dún Laoghaire-Rathdown County Council to ensure that the necessary cycling infrastructure is provided to encourage more people to use cycling for their everyday mobility needs. Additionally, the Development Plan acknowledged the growing options for cycle mobility, in this regard, we note the following:

‘With increasing numbers of people cycling and a growing number of options for cycle mobility, including cargo bikes, bike trailers and e-bikes, all of which increase the range of uses and needs, which cycling can respond to, it is essential that well integrated, accessible and secure cycle parking, to cater for all types of cycles, and for cyclists of all ages and abilities is provided within new developments. This will help to encourage the use of new mobility solutions for everyday mobility needs such as shopping, delivery and school drop off/collection’.

The proposed development incorporates standard cycle parking spaces as well as cargo bike and e-bike spaces, therefore accommodating a variety of cycle parking needs. With regard to the assessment of cycle parking in developments of over 5 units, we note the following provided in the Development Plan:

‘In general, new residential developments of 5 units or more or non-residential of 400 sq. m. or over will be assessed in accordance with the following criteria:

- *Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of outsized formats (cargo bikes etc)?*
- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?’*

It is proposed to provide 180 no. cycle spaces throughout the site, which comprises 8 no. non-standard bicycle parking spaces. The locations of the bike stores ensure that these spaces are accessible. Additionally, these spaces are overlooked by the proposed development, thus enhancing security. The internal cycle routes connect well with off-site cycle facilities which are accessed by the internal route network through the proposed entrances to the northwest and southwest of the site. As this is a residential development, the provision of designed and integrated cycling and pedestrian facilities, including showers, locker/changing rooms and drying areas, is not considered to be a relevant requirement.

The Development Plan notes *‘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’.* In this regard, we refer to the Sections 4.0 and 6.0 of the Transport Statement prepared by TENT Engineering which provides an assessment of the cycle connectivity of the site and proposed cycle parking to ensure a high-standard is provided in compliance with Dún Laoghaire-Rathdown County Council’s Cycle Parking and Associated Cycling Facilities for New Developments (2018).

As per Table 4.1 of the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018), the proposed development of 129 no. units generate a requirement of 156 no. cycle parking spaces comprising 129 no. long-stay spaces and 26 no. short stay/visitor parking spaces.

The proposal provides 180 no. cycle parking spaces, which is in excess of the required provision in the Development Plan and demonstrates compliance with guidance as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. As the Development Plan requires 156 no. spaces to be provided, these spaces are provided as Sheffield parking spaces in compliance with requirements as set out in the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018). Additional bicycle parking is provided as stacked cycle parking.

Overall, the proposed cycle parking has demonstrated compliance with guidance as set out in the Development Plan and the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018).

Table 4.1 Cycle parking for residential development		
Residential Development type	1 short stay (visitor) parking space per: (Minimum of 2 spaces)	1 long stay parking space per: (Minimum of 2 spaces)
Apartments, Flats, Sheltered housing	5 units	1 unit

Figure 54.0 Extract from Table 4.1 – Cycle Parking for Residential Development of the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018).

7.1.9 Protected Structures

As noted, there are no protected structures on site, as such, the development does not propose work to a protected structure. We would note, however, that Emmet House (RPS No. 18) is situated to the north of the site. The Development Plan states the following with regard to the extent of a protected structure:

‘A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure, any other structures lying within that curtilage and their interior and all fixtures and features which form part of the interior or exterior of that structure’.

As demonstrated by the aerial image included in Figure 55.0 of this report, we would note that Emmet House is set back from the boundary of the subject site by a paved area which is part of the internal road network of the neighbouring site. In this regard, it is considered that the proposal will not impact the curtilage of the protected structure, therefore protecting the architectural heritage, character and amenity of the structure.

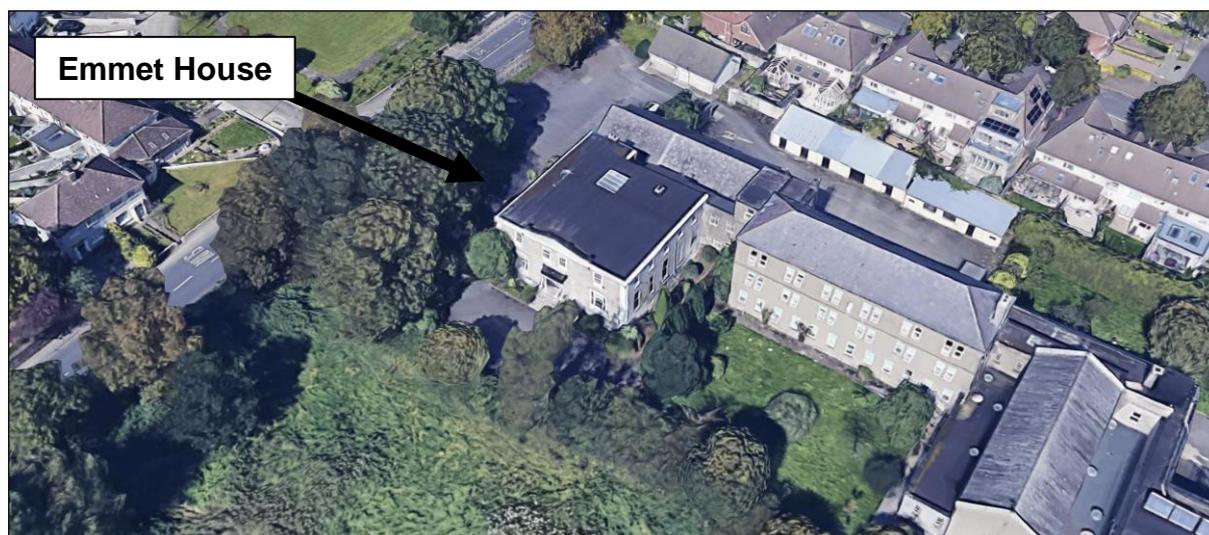


Figure 55.0 Aerial image of Emmet House.

The location of the protected structure with regard to the subject site has been considered throughout the design process. The proposal has been designed to protect the architectural heritage and character of Emmet House by providing significant setbacks to ensure that the proposal does not appear overbearing or overly dominant in scale, allowing Emmet House to be read in its own context. At its closest point, Block A is situated 29.5 metres from the façade of Emmet House. In this regard, it is considered that significant separation distances have been provided to ensure the protection of the Character of Emmet House. Additionally, the proposed public open space situated to the north of the site provides a buffer between the proposed development and Emmet House and retains the similar context of Emmet House at present. In this regard, it is considered that the proposal has sufficiently considered the context and character of Emmet House and has been designed to successfully ensure the protection of the architectural heritage and character.

To ensure clarity on the protection of the architectural heritage and character of Emmet House, we would refer to the Architectural Heritage Impact Assessment prepared by Chris Ryan. This assessment notes that the proposal has been designed to minimise any adverse effect on Emmet House and highlights that due to the development proposed and alterations to the subject site boundary along Dundrum Road, this will increase visibility of Emmet House to the public, allowing for the architectural heritage and contributions of this structure to be visible. In noting this, the assessment also states that the development has successfully ensure the retention of the character and significant of Emmet House.

7.1.10 Housing Needs Demand Assessment

The Development Plan highlights the importance of housing supply and housing choice to ensure that existing and future populations of the County are catered for. As demographics change, it is important to ensure that the changing population and associated housing needs can be met, allowing for existing residents to remain in the County while providing new residents with better housing options to choose from. In this regard, we would refer to the following policy objective:

Policy Objective PHP27: Housing Mix

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

Appendix 2: Housing Strategy and Housing Need Demand Assessment (HNDA) of the Development Plan addresses the issue of the provision of housing for the existing and future population of Dún Laoghaire-Rathdown. Table 2.9.1 of the strategy sets out the unit mix for residential development in the County.

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

Figure 56.0 Extract from Table 2.9.1 – Mix Requirements for Residential Schemes of Appendix 2 - Housing Strategy and Housing Need Demand Assessment (HNDA) of the Development Plan.

While the proposed development provides for 129 no. residential units consisting of 72 no. one-beds, 29 no. two bed (3-person) and 28 no. two-bed (4-person) units comprise 100% one and two-bed units. In this regard, we would refer to the following from Appendix 2, which states that ‘Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Council Housing Department’. The proposed development which is submitted under Part 8, and has been

designed to address the specific needs of the Council Housing Department and therefore, a deviation from Table 2.9.1 of Appendix 2 of the Development Plan is considered appropriate.

To further ensure an appropriate residential mix, we would refer to the following included in Section 12.3.3.1 of the Development Plan which states:

‘Applications received in both new residential communities and within the residual built up area shall include:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development’.*

We refer to Figure 57.0 which includes a map of the area within a 10-minute walking distance of the subject site and refer to Table 11.0 which includes the details of existing units types.



Figure 57.0 10-minute walking distance from the subject site (red star).

Residential Ares	General Housing Type	General Housing Mix
Bankside Cottages	Terraced dwellings	2/3-bedroom dwellings
Beechmount Dr and Roebuck Lawn	Detached, semi-detached and terraced dwellings and apartments	2/3/4-bedroom dwellings
Bird Avenue	Detached and semi-detached dwellings	3/4-bedroom dwellings
Churchfields	Detached and semi-detached dwellings	3/4-bedroom dwellings
Convent Avenue Apartments	Apartments	1/2-bedroom apartments
Dodderbank Apartments	Apartments	1/2-bedroom apartments
Dundrum Road	Detached, semi-detached and terraced dwellings	2/3/4-bedroom dwellings
Farrenboley Cottages	Detached and semi-detached dwellings	2/3/4-bedroom dwellings
Farrenboley Park	Detached and semi-detached dwellings	2/3/4-bedroom dwellings
Glasson Court	Terraced and some semi-detached dwellings	2-bedroom dwellings

Gledwoods Park and Ave	Terraced and semi-detached dwellings	3-bedroom dwellings
Hawthorn Meadows	Detached and semi-detached dwellings and apartments	3/4-bedroom dwellings and 2-bedroom apartments
Laburnum Road	Detached and semi-detached dwellings	3/4-bedroom dwellings
Maple Road	Large detached dwellings	4+-bedroom units
Millmount Grove	Terraced and some semi-detached dwellings	2/3-bedroom dwellings
Milltown Bridge Road	Detached, semi-detached and terraced dwellings	3/4-bedroom dwellings
Milltown Grove	Apartments	2/3-bedroom apartments
Milltown Hill & Court	Apartments	1/2-bedroom apartments
Milltown Road	Large detached dwellings	4+-bedroom units
Mount Saint Anne's	Apartments	1/2-bedroom apartments
Mulvey Park	Terraced and some detached and semi-detached dwellings	3-bedroom dwellings
Olivemount Grove	Terraced and some detached dwellings	2/3-bedroom dwellings
Shangarry	Apartments	1/2-bedroom apartments
St. Columbanus Place and St. Gall Gardens South	Terraced and some semi-detached dwellings	2/3-bedroom dwellings
St. Columbanus' Road	Terraced and some semi-detached dwellings	3-bedroom dwellings
St. Lukes Crescent	Terraced and some detached dwellings	3-bedroom dwellings
Thornclyff	Apartments	2-bedroom apartments
Whitebeam Road	Large detached, semi-detached and terraced dwellings	3/4+-bedroom dwellings
Whitethorn Road	Detached, semi-detached and terraced dwellings	3/4-bedroom dwellings
Woodhaven	Apartments	2-bedroom apartments

Table 11.0 Analysis of existing unit types within a 10-minute walk of the subject site.

The proposed development provides for 129 no. residential units consisting of 72 no. one-beds, 29 no. two bed (3-person) and 28 no. two-bed (4-person) units. We note that the proposal does not include any three-bedroom units and the development plan seeks a minimum of 20% three bed units for a standard residential application. However this is a Local Authority Development driven by the Housing Departments requirements and demands and in this regard the proposal fully accords with the Development Plan which states:

Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Council Housing Department'. The proposed development which is submitted under Part 8 of the Act which permits a temporary exemption from the Part 8 process, has been designed to address the specific needs of the Council Housing Department and therefore is considered appropriate.

We also note that the mix of unit types also accords the Apartment Guidelines which state

Specific Planning Policy Requirement 1

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

The proposed development provides for 129 no. residential units consisting of 72 no. one-beds, 23 no. two bed (3-person) and 34 no. two-bed (4-person) unit. One-bed units represent 55.81% of the total units. In this regard, the proposed development is slightly exceeding with this Specific Planning Policy Requirement.

We also note the guidelines state that:

*The mix parameters set out above that generally apply to apartments, **do not apply to purpose-built student accommodation or to certain social housing schemes**.*

Therefore, it must be noted that there is a certain flexibility applicable to social housing schemes within the apartment guidelines as well as the development plan.

With regard to apartments not complying with the Apartment Guidelines, we would note that the apartment guidelines specifically state that in relation to social housing it is considered necessary that the guidelines would also make provision for a two-bedroom apartment to accommodate 3 persons. This is in line with the Quality Housing for Sustainable Communities guidance published by the Department in 2007, for application to social housing schemes. Accordingly, **planning authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 square metres, in accordance with the standards set out in Quality Housing for Sustainable Communities (and reiterated here in Appendix 1). This type of unit may be particularly suited to certain social housing schemes such as sheltered housing.**

We also note that the Guidelines state:

*While providing necessary variation in dwelling size, it would not be desirable that, if more generally permissible, this type of two-bedroom unit would displace the current two-bedroom four-person apartment. Therefore, **no more than 10% of the total number of units in any private residential development** may comprise this category of two-bedroom three-person apartment. This is to allow for potential social housing provision further to Part V of the Planning and Development Act 2000 (as amended), or, if this type of unit is not required to meet social and affordable housing requirements, that it would allow for an acceptable level of variation in housing type.*

We are not providing a private residential development. We are proposing a social housing development driven by the requirements and demands of the Housing Department of Dun Laoghaire Rathdown. The apartment guidelines specifically state that 10% is applicable to private residential schemes and we are not falling within this category. There is provision provided in the guidelines for such apartment type to be provided for social housing schemes and there is no prohibition on the quantum of such unit types for social housing schemes set out in the Apartment Guidelines.

Therefore, noting the flexibility provided for social housing schemes within both the Apartment Guidelines and indeed the development plan for unit mix, and that the mix has been overseen by the Housing Department of DLRCC, the proposed housing mix and unit types are considered acceptable.

7.1.11 Building Height Strategy

The proposed development includes blocks with heights of part 5, part 6 storeys. From a review of the immediate surrounding area, there is an established pattern of development of two-storey, low-density dwellings. Despite this, however, additional height can be provided in instances where consideration is made to the prevailing context of a site and a proposal is designed to ensure the protection of residential amenities while ensuring a high level of amenity for future occupants on a well-served and underutilised site. We would consider there to be an opportunity at the subject site for additional development and heights which exceed that as established.

The proposal has ensured significant setbacks from neighbouring properties and block layouts which avoid the proposal appearing overbearing in scale, protecting existing amenity while providing additional housing on this well-served site. The Development Plan makes reference to the Building Height Strategy and that proposals for increased heights should have due regard for this strategy. We would note the following policy objective in this instance:

Policy Objective PHP42: Building Design & Height

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).

Further to this, the site is situated in an area deemed to be a 'residual suburban area'. In this regard, we would note the following policy objective included in the Building Height strategy:

Policy Objective BHS3: Building Height in Residual Suburban Areas

It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.

Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.

As highlighted in Section 5.7 of this report, the proposed development demonstrated compliance with the Development Management Criteria set out in Section 3.4 of the Building Height Guidelines, as required by SPPR 3 of these Guidelines. As required by Policy Objective BHS3 of the Building Height Strategy of the Development Plan, an assessment of the development against Table 5.1 of Section 5 of the Building Height Strategy has been undertaken and is outlined in Table XX.0.

Criteria for All Such Proposals	Demonstrated Compliance
1. At County Level	
<i>a. 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.</i>	The proposed development provides for 129 no. units on a well-served and underutilised site within the built-up footprint of Dublin, demonstrating compliance with National Policy Objectives 3a and b, specifically, of the NPF.
<i>b. 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.</i>	The subject site is within 500 metres of the Milltown Luas Stop. Additionally, the site is served by high-frequency public transport along Dundrum Road to the immediate west of the site, with services having a peak frequency of 10-minutes connecting the site to the city centre and surrounding areas as well as links with other modes of public transport.
<i>c. 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 cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</i>	The proposal has been designed to successfully integrate into the character and public realm of the area. Due to the layout of the proposal, passive surveillance will be provided along Dundrum Road and, in addition to the high-quality architecture proposed, will significantly enhance the public realm. The site adjoins the site of a protected structure to the north. This has been considered throughout the design process, and significant separation distances are provided to ensure the protected structure can remain legible without impact from the proposed development.

<p><i>d. 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.</i></p>	<p>As noted, the proposed development has been designed with setbacks from the site of the protected structure to the north and, as such, protects the view of this structure. It is noted, however, that there are no protected views and prospects identified at the site.</p>
<p><i>e. Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</i></p>	<p>The subject site is situated on well-served and accessible lands. Infrastructure in the surrounding area includes frequent bus and Luas services as well as education, sports fields and public open space.</p>
<p>2. At District/Neighbourhood/Street Level</p>	
<p><i>a. Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</i></p>	<p>The proposal has been designed to consider the context of the site and the predominantly low-rise nature of neighbouring residential properties. In this regard, we note the location of Block C to the east of the site, which comprises two-storey duplex units, where the site adjoins the Churchfields development. Additionally, blocks A and B, with heights of part 5, part 6-storeys are situated to the west and centre, respectively, of the site and have been setback from neighbouring properties to ensure these integrate into the built environment. Furthermore, we note the placement of Block A to the west of the site, which overlooks Dundrum Road, providing passive surveillance. In addition to this, the high-quality architectural design will ensure the enhancement of the built environment, making a positive contribution to the streetscape.</p>
<p><i>b. Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</i></p>	<p>As demonstrated within the architectural pack prepared by Reddy Architecture and Urbanism, the proposed development includes undulating facades and the use of a variety of materials which provide for interesting facades as well as reducing the perceived massing and avoiding a proposal which appears monolithic. Additionally, block lengths are not considered to be excessive and, therefore, avoid long uninterrupted walls of buildings.</p>
<p><i>c. Proposal must show use of high quality, well considered materials.</i></p>	<p>We would refer to the Design Statement prepared by Reddy Architecture and Urbanism, which highlights the varying materials used throughout the development which contribute to the overall appearance of the site and development. The materials have been selected to complement the existing palette of materials in the surrounding area while allowing for the site to create its own identity. The materials chosen provide visually interesting and appealing facades which contribute to the public realm and surrounding area.</p>
<p><i>d. Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</i></p>	<p>The subject site does not comprise a thoroughfare, however, we note that the site comprises an existing pedestrian entrance to the east of the site at the Churchfields residential development. The layout of the proposal has been designed to facilitate the potential future use of this entrance, enhancing connectivity and permeability in the surrounding area. The</p>

	<p>proposal has been designed to ensure that the proposed pathways connecting to the neighbouring areas are overlooked, ensuring feelings of safety and security. The proposed blocks also overlook the proposed communal and public open spaces, providing for passive surveillance. As such, it is considered that the proposal is in keeping with proper urban planning and design objectives, enhancing urban design context for public spaces.</p>
<p><i>e. 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.</i></p>	<p>The proposed development does not adjoin Dundrum Road directly, as the proposal includes the retention of part of the existing boundary wall. Despite this, however, we would note that the proposal interacts positively with the internal street network of the development, providing for a high level of visual amenity through the use of a variety of high-quality and considered materials, ensuring future occupants are provided with a development which is visually pleasing. As the site is currently vacant and undeveloped, it is considered that the proposal enhances the legibility of the site and develops the site's character.</p>
<p><i>f. Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.</i></p>	<p>The subject site is zoned Objective A in the Development Plan, and therefore, the range of uses is restricted. Despite this, however, the proposal is considered to positively contribute to the available amenities in the surrounding area as it is proposed to provide 2,616 sq.m of public open space, which is available for future occupants of the development and existing occupants of the surrounding area. Additionally, the development provides for 129 no. units comprising 72 no. one-beds, 29 no. two bed (3-person) and 28 no. two-bed (4-person) units addressing a variety of housing needs and supporting a mixed community.</p>
<p><i>g. Proposal should provide an appropriate level of enclosure of streets or spaces.</i></p>	<p>As evident by the architectural drawings prepared for the development, the proposal ensures an appropriate level of enclosure of the internal street network. The proposed development does not interact directly with Dundrum Road, however, we would note the proximity of Block A to the western site boundary, which is considered to enhance the streetscape of Dundrum Road and create a sense of enclosure while ensuring avoiding overbearing and overlooking impacts of neighbouring properties.</p>
<p><i>h. Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</i></p>	<p>The proposed development is considered to be an appropriate urban grain for the site and nature of the proposal, which allows for the provision of 129 no. units on this well-served and underutilised site. The urban grain has been established to ensure that development does not appear overbearing on the site and avoids a massing which is not considered to be at a human scale. These considerations provide for a development with visually appealing facades and</p>

	<p>appropriate massing. Additionally, the spaces between buildings allow for social interactions, providing a means of social capital and supporting a healthy and connected community. These spaces can be seen throughout the site and are overlooked, providing a sense of comfort and security.</p>
<p><i>i. Proposal must make a positive contribution to the character and identity of the neighbourhood.</i></p>	<p>The proposed development introduces heights which exceed that as typically established in the surrounding area. As such, due regard has been given to the potential impact taller buildings can have on existing residential properties. As such, appropriate setbacks have been provided from existing dwellings which neighbour the site, protecting residential amenities. The proposal is considered to establish a new character of development in the area. In noting this, the design and layout of the proposal ensure successful integration into the context of the site and, due to the use of materials and considerations to scale and the design of the facades of the development, is considered to make a positive contribution to the character and identity of the neighbourhood. The site, which is currently undeveloped, will have a high level of communal and public open space retained and will, therefore, enhance amenities in the area. Additionally, it is considered that the high levels of open space provided ensure the protection of the open space character of the site while allowing for residential development within the built-up footprint of Dublin.</p>
<p><i>j. Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</i></p>	<p>The proposal has been designed to consider the form of buildings and landscape around the site's edge. In this regard, we note the location of Block C to the east of the site, which comprises two-storey duplex units, where the site adjoins the Churchfields development, which also comprises two-storey dwellings. Additionally, Blocks A and B, with heights of part 5, part 6-storeys are situated to the west and centre, respectively, of the site and have been setback from neighbouring properties to ensure there are no negative impacts with regard to privacy and daylight access.</p>
<p>3. At site/building Scale</p>	
<p><i>a. Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</i></p>	<p>The proposal ensures a design which maximises access to natural daylight, ventilation and views while avoiding overshadowing neighbouring properties as well as those proposed within the site. 50.4% of units are dual aspect, ensuring that future occupants are provided with high levels of daylight access. We would also refer to the daylight/sunlight report prepared by 3D Design Bureau, which includes an assessment of daylight access for the proposed units and neighbouring dwellings where it is considered that the proposal will protect existing amenities with regard to daylight access and ensure that</p>

	future occupants are provided with high levels of access in keeping with BRE regulations.
<i>b. 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 out. On relatively unconstrained sites requirements should be met.</i>	We refer to the Daylight/Sunlight Analysis prepared by 3D Design Bureau, which details compliance with BRE guidance.
<i>c. Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.</i>	As noted, block C of the proposed development is situated to the east of the site, which adjoins the Churchfields residential development. As such, this avoids overlooking these properties. Additionally, Dundrum Road separates the site from the dwellings to the west and affords high separation distances from Block A of the development and neighbouring properties, protecting privacy and daylight access.
<i>d. Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</i>	The site is not situated within an ACA, however, we would note that the site of a protected structure adjoins the subject site to the north. Block A of the proposed development is situated 29.490m at its closest point to the protected structure, which is considered to be significant and sufficient to ensure no impacts to the setting of the protected structure.
<i>e. Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development</i>	In this regard, we refer to the Climate Change and Energy Report prepared by TENT Engineering.
4. County Specific Criteria	
<i>a. 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.</i>	This criterion is not relevant to the subject site.
<i>b. 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.</i>	The proposed development will have no impact on the mountain landscape views from the County.
<i>c. Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning’s stage).</i>	A full planning pack has been compiled, which assesses each required item of the development to ensure a suitable proposal for the subject lands.
	This criterion is not relevant to the subject site.

<p><i>e. Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</i></p>	<p>Due to the locational context of the subject site, it is not considered that the proposal will have an impact on sensitive bird/bat areas.</p>
<p><i>f. Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</i></p>	<p>The proposed development is not considered to be of a scale which could impact this.</p>
<p><i>g. An assessment that the proposal maintains safe air navigation.</i></p>	<p>The proposed development is not considered to be of a scale which could impact this.</p>
<p><i>h. Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</i></p>	<p>AA Screening and EclA Reports have been prepared by Openfield Ecological Services. Additionally, an EIA Screening Report has been prepared by Altermar Environmental Consultants. The results of these reports show the proposed development is suitable for the subject and will not have significant impacts regarding these items.</p>
<p><i>i. Additional criteria for larger redevelopment sites with taller buildings</i></p>	<p>The site of 0.98263 ha providing for 129 no. units is considered to have the appropriate documents prepared to ensure a proposal which allows for an assessment of the development against all required elements.</p>
<p><i>j. 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.</i></p>	<p>The proposed development comprises 3 no. blocks of varying scales with heights between 2-6 storeys and setbacks introduced at upper levels of Blocks A and B to ensure an appropriate massing for the site. Undulating facades and the use of a variety of materials throughout the proposed development ensure visual interest and a high level of amenity. The subject site is situated in an area of traditionally low density, however, the proposal is considered to have been designed to integrate into the site, protecting amenities and using setbacks and design considerations to protect this character while providing for increased heights and densities.</p>
<p><i>k. For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.</i></p>	<p>We refer to the Daylight/Sunlight Analysis prepared by 3D Design Bureau, which details compliance with BRE guidance.</p>

Table 12.0 Compliance with the criteria of Table 5.1 – *Criteria for assessing proposals for increased height* of the Building Height strategy.

8.0 Appropriate Assessment and Environmental Impact Assessment

The EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as ‘the Habitats Directive’, was adopted in 1992, came into force in 1994 and was transposed into Irish law in 1997.

The main aim of the Habitats Directive is to contribute towards the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory.

To assess the potential impact on protected Natura 2000 sites, Openfield Ecological Services have prepared an Appropriate Assessment Screening Report which is submitted with this Planning Report. This report assesses the impact on Natura 2000 sites with regard to habitat loss, habitat disturbance, hydrological pathways and abstractions. The assessment highlights that there are no significant effects

likely to arise from the proposed development. In this regard, we would note the following conclusion in the Appropriate Assessment Screening report:

'No significant effects are likely to arise from this project to any Natura 2000 site.

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded on the basis of the best scientific knowledge available'.

The proposed development is therefore considered to be suitable for the subject site, in this regard.

An Environmental Impact Assessment Screening exercise has been completed by AWN Consulting Limited. In summary, the screening report has concluded that an EIAR is not required for the proposed development as the characteristics of the proposal are not considered significant. As such, we would not the following included in the conclusion section of the EIA Screening Report:

'It is concluded, based on the evidence documented in Sections 3.0, 4.0 and 5.0, that having regard to the nature, scale and location of the subject site, there is no likelihood of significant effects on the environment arising from the Proposed Development on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an Environmental Impact Assessment Report (EIAR) is not required in this instance'.

The proposed development is therefore considered to be suitable for the subject site in this regard.

9.0 Daylight and Sunlight

A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau for the proposed development. The report shows how the proposal will integrate into the site and will have a negligible impact on the surrounding area with regard to overshadowing. The report also details how the proposed units will be provided with high levels of daylight access in keeping with proper planning and development guidelines.

The design and layout of the development has been prepared to ensure that existing residential amenities, inclusive of daylight access, have been considered and are protected. The BRE Guidelines state that the percentage of a garden or amenity space that can receive more than 2 hours of sunlight on March 21st should be 50%. The report highlights how all amenity spaces in the surrounding area achieve this. The proposal is therefore considered to be compliant with the BRE Guidelines in this regard.

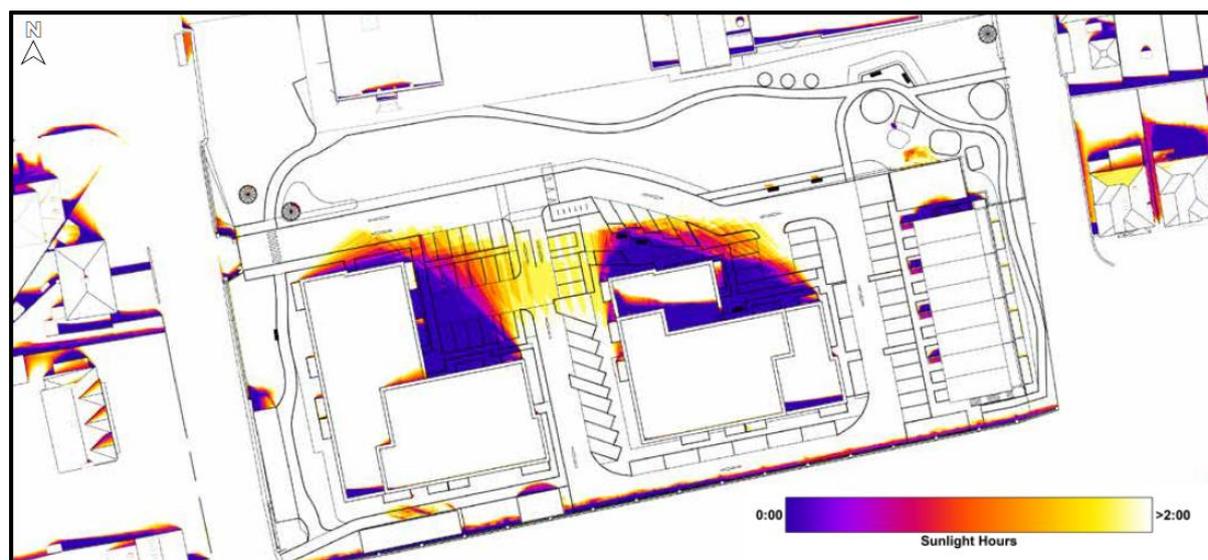


Figure 58.0 Extract from Figure A.19 of the Daylight and Sunlight Assessment Report which shows all areas capable of receiving 2 hours of sunlight on March 21st.

With regard to the proposed development, c. 97% of units assessed with trees achieve compliance with Spatial Daylight Autonomy which assesses where a space receives sufficient daylight on a working plane during standard operating hours on an annual basis.

10.0 Engineering

Water supply, wastewater and drainage proposals have been designed by TENT Engineering and ensure compliance with all relevant documentation to provide for a development which is in keeping with proper planning and sustainable development. A Flood Risk Assessment has also been prepared which highlights the suitability of the site for the proposed development, ensuring the longevity of the proposal protecting residential amenity. A summary of the proposals will be provided in the following section.

10.1 Foul Drainage

The foul water drainage system for the proposed development has been designed in accordance with the Irish Water 'Code of Practice for Wastewater Infrastructure'. An existing foul water network has been identified and is connected to the subject site. As such, foul water management will connect into the public sewer to the east of the site at Churchfields.

10.2 Water Supply

The water supply system for the proposed development has been designed in accordance with the Irish Water 'Code of Practice for Wastewater Infrastructure'. A water main network has been identified to the west of the site and this will be the point for the proposal to connect into. The proposed development will be served with a water pipe size of Ø100mm U.N.O., from Block A, B, and C, each of which connects into a single Ø150mm pipe, U.N.O., that directly ties into the public network. Additionally, 2 no. fire hydrants will be installed on-site to ensure adequate coverage in the event of an emergency.

10.3 Surface Water Drainage

The surface water drainage system proposed for this residential development involves the use of Sustainable Urban Drainage Systems (SUDS). This includes green roofs, blue roofs, permeable surfaces, tree pits, soakaways and petrol interceptors, ensuring that surface water is managed accordingly, protecting the site and surrounding area from pluvial flooding as a result of the development.

10.4 Flood Risk Assessment

The results of the Flood Risk Assessment prepared by TENT Engineering highlight that the site is not situated in an area with a documented potential flood risk, with the site being situated within Flood Zone C, which covers all areas of the Development Plan which are not in zones A and B. Therefore, there is a very low flood risk on site. Due to this low risk, it is considered that no flood mitigation efforts are required for fluvial and tidal floods, groundwater floods and surface water flooding to the site. In order to ensure the protection of neighbouring properties, we would note the following included in the Flood Risk Assessment with regard to surface water flooding from the site:

'A green-blue roof provides attenuation storage volume with a limited discharge velocity. Aco-drains or similar avoid storm water build-up at door openings. Soakaways reduce surface water buildup and prevent localized flooding. Tree pits use soil and root zones to absorb, store, and filter stormwater, reducing runoff and enhancing groundwater recharge'.

In this regard, it is submitted that the site is suitable for the proposed residential development and sufficient efforts have been made to ensure that the proposal does not represent a flood risk for the surrounding area.

11.0 Conclusion

It is submitted that the proposed development, which comprises the construction of 129 no. residential units contained within three blocks at the subject site, is considered to be acceptable and compliant with the relevant policies and objectives as set out in the applicable national, regional and local planning context. At a National, Regional and Local level, this statement has demonstrated consistency with the following:

- Project Ireland 2040 – National Planning Framework (2018)
- Project Ireland 2040 National Development Plan
- Housing For All – A New Housing Plan for Ireland
- Regional Spatial and Economic Strategy for the Eastern and Midland Region, June 2019
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)
- Urban Development and Building Height Guidelines (December 2018); and
- Dún Laoghaire-Rathdown County Development Plan 2022-2028.

The proposed development would provide additional living accommodation in close proximity to frequent public transport within the built-up area of the County whilst protecting the amenity and character of the surrounding area. In addition, the proposed development, in terms of scale, form and finishing materials, seeks to enhance the visual amenity of the area by ensuring the use of high-quality materials and undulations to the façade to provide visual interest.

The proposed development has been designed to a high standard to contribute to the surrounding form of the area and is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plan and other national guidance documents.

The proposed development has considered the requirements of Part 8 of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2023, and the proposed development is therefore considered to represent a proposal which complies with these requirements.

In this regard, it is considered that the proposed development is in keeping with the proper planning and sustainable development of the area.

Yours sincerely,



Kevin Hughes MIPI MRTPI
Director for HPDC