



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

PLANNING REPORT

PROPOSED PART 8 RESIDENTIAL DEVELOPMENT

Residential Development at Leopardstown Road, Dublin 18

FEBRUARY 2025

PREPARED ON BEHALF OF:
Dún Laoghaire-Rathdown Council

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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 80 no. residential units consisting of 31 no. one-bed, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-bed units in 2 no. blocks. The proposed development has been prepared and submitted in accordance with Section 179 of the Planning and Development Act 2000 (as amended) (herein referred to as 'the Act') and Part 8 of the Planning and Development Regulations 2001 (as amended), 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 |
| Wave Dynamics Acoustic Consultants | Acoustic Design Statement |

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 80 no. residential units on a gross site of circa 0.8861 hectares in area, located in Leopardstown Road, Dublin 18,

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 Design Team has advanced proposals on behalf of the National Development Finance Agency (NDFA) in consultation with Dún Laoghaire-Rathdown County Council. The units are to be delivered using in accordance with the Part 8 consent on behalf of the local authority.

The site for this project will always be owned by the state. The local authority is the landlord, and it is in charge of nominating tenants from the social housing waiting list in accordance with the allocation scheme.

The subject site proposes the development of 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds in 2 no. blocks.

2.0 Site Location and Description

The subject site comprises c. 0.8861 ha and is situated to the south of the M50 and Leopardstown Road to the south. The site currently comprises a one-off, single-storey dwelling with attic accommodation and associated garage called 'Residential Development at Leopardstown Road' and the open field lands to the east of this dwelling. The area is characterised by a variety of housing typologies, inclusive of one-off dwellings and planned residential developments of two-storey detached and semi-detached dwellings. In the wider surrounding area, recently approved developments comprising apartments can be seen. 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. Additionally, the site is situated c. 880 metres to the southwest of South County Business Park and Central Park Business Park, offering a range of employment opportunities from multinational corporations including Vodafone, Microsoft and Mastercard.

The site is considered to be well-served by public transport. Dublin Bus Route Nos. 44 and 47 provide a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Sandyford, Sandymount, Stepside and UCD. Additionally, the site is within a 10-minute walk of the Glencairn 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 dwelling and associated garage proposed for demolition.

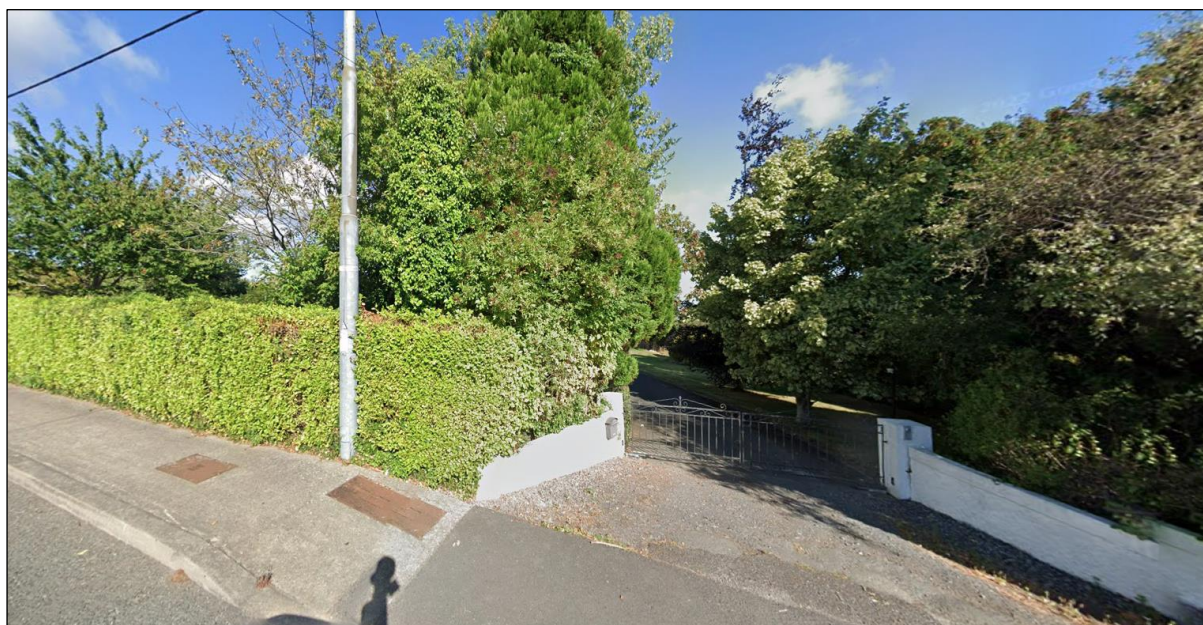


Figure 4.0 Streetview image of the entrance to Residential Development at Leopardstown Road.



Figure 5.0 Streetview image of the entrance to the open field to the east of Residential Development at Leopardstown Road.



Figure 6.0 Streetview image of the open field to the east of Residential Development at Leopardstown Road as viewed from the southeast.



Figure 7.0 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 no planning applications pertaining to the subject site.

3.2 Surrounding Area

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

1.19 Ha. At Lisieux Park, Murphystown Road, Leopardstown, Dublin 18 (720m southeast of the subject site)

ABP Ref. 307415

Planning permission granted by An Bord Pleanála on 6th October 2020 for the construction of a Strategic Housing Development (SHD) of 200 no. units in 4 no. blocks with heights between 4-7 no. storeys and a creche.

The development granted under ABP Ref. 307415 is situated in an area which is typically characterised by two-storey detached and semi-detached dwellings, as the majority of the surrounding area currently comprises. Despite this, however, planning permission was granted for the site with heights of up to 7-storeys. While this development introduces an increased height at the site than that as established in the surrounding area, we would note the following positive commentary included in the Inspector's Report regarding this:

*'While I note the character of the area is predominantly low rise two storey dwellings, **the area along the Luas line is evolving and comprises a mix of apartment developments** (existing and permitted) to the southeast and to the northeast of the site. I consider the site suitable for increased density and increased height and have considered this in the context of the existing environment and character of the area, as discussed further hereunder'.*

*'However, having viewed the dwellings from the site and visited the area and having regard to the separation distances involved, the width of Murphystown Way and Luas Line and additional open space at the junction between the site and the northeast of the roundabout, I consider the site can take additional proposed height at this corner and **the proposal while visible from the***

surrounding area, will not in my opinion, detract from the character of the area, but add to increased legibility’.

We note that while the area predominantly comprises low-rise two-storey dwellings, there is a clear emerging pattern of development in the area of increased heights and densities within the built-up footprint of Dublin, which are well-served by public transport, supporting a more consolidated and compact form of development. The area is considered to be well-served due to good transport connections and has resulted in additional residential development in recent years. The area also benefits from being within close proximity of Central Park Business Park and South County Business Park, providing employment opportunities within easy access of existing and new residential development.

The development granted under ABP Ref. 307415 provides a density of 168 no. units per hectare. While this was considered high for the site as the surrounding area comprises predominantly low-rise, low-density suburban development, the Board had considered this acceptable as this density is considered to be suitable for the site given the availability of public transport and services in the surrounding area, promoting compact development on underutilised sites. We refer to the following in this regard:

‘Given the site’s zoning, immediate context, and location proximate to a high capacity Luas line and to high employment areas, I am of the opinion that the delivery of residential development on this prime, underutilised, serviced site, in a compact form comprising higher density units would be consistent with policies and intended outcomes of current Government policy, specifically the NPF, which looks to secure more compact and sustainable urban development with at least half of new homes within Ireland’s cities to be provided within the existing urban envelope (Objective 3b)’.

‘The density proposed is within the range expected adjoining a high capacity public transport corridor within the Dublin metropolitan area, where no maximum density is set and is in my opinion acceptable, subject to an assessment of design and amenity standards, which are discussed further in detail hereunder. The proposal serves to widen the housing mix within the general area, and would in my opinion improve the extent to which it meets the various housing needs of the community’.

The development proposed at the subject site of 80 no. units provides for a density of 90.3 no. units per hectare. In this regard, we would highlight the proximity of the site to the Glencairn Luas Stop along Murphystown Way as well as the proximity to Dublin Bus services. As such, it is considered that the density of the proposal is appropriate for the site as it is in keeping with a consolidated and compact form of development on well-served lands within the built-up footprint of Dublin. Further to this, we would note the layout of the proposed development, which is considered to successfully integrate into the context of the subject site as it is proposed to provide three-storey duplex units to the west of the site, adjoining low-rise dwellings, and the taller part 5, part 6 storey element to the east. It is considered that this design consideration ensures a smooth visual transition in height while protecting the existing residential amenity of neighbouring properties regarding daylight access and privacy.



Figure 8.0 Site plan of the development granted under ABP Ref. 307415.



Figure 9.0 Northern elevation of the development granted under ABP Ref. 307415.



Figure 10.0 Eastern elevation of the development granted under ABP Ref. 307415.

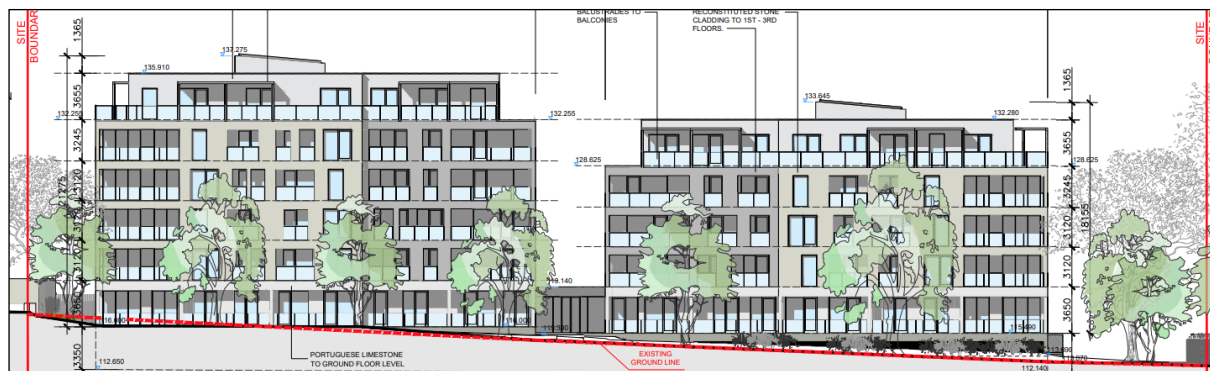


Figure 11.0 Western elevation of the development granted under ABP Ref. 307415.

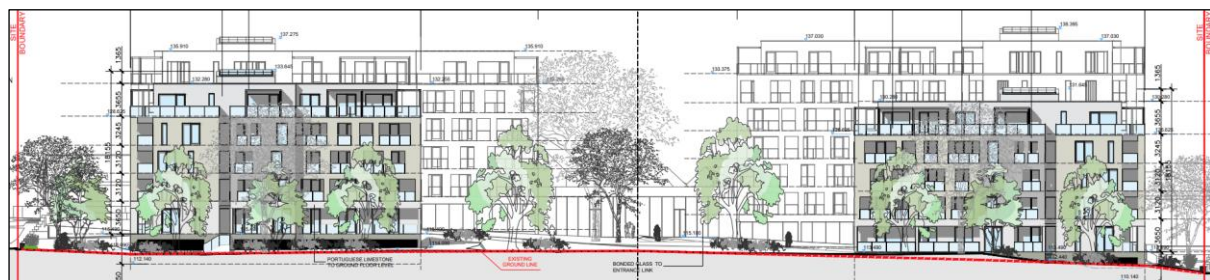


Figure 12.0 Southern elevation of the development granted under ABP Ref. 307415.

A number of alterations have been made to the parent permission which are summarised below:

- | | |
|------------------------------|--|
| Reg. Ref. LRD23A/0364 | Planning permission granted by Dún Laoghaire-Rathdown County Council on 31 st August 2023 for alterations to the SHD granted under ABP Ref. 307415 inclusive of reconfigurations to storage areas and basement level. |
| Reg. Ref. LRD23A/0363 | Planning permission granted by Dún Laoghaire-Rathdown County Council on 9 th November 2023 for alterations to the SHD granted under ABP Ref. 307415 inclusive of revision to substation and switchroom. |
| Reg. Ref. LRD23A/0718 | Planning permission granted by Dún Laoghaire-Rathdown County Council on 4 th April 2024 for alterations to the SHD granted under ABP Ref. 307415 inclusive of revisions to the layout, unit mix, increase in creche floor area and residential amenities and minor elevational changes. |

Reg. Ref. LRD24A/0304

Planning permission granted by Dún Laoghaire-Rathdown County Council on 25th July 2024 for alterations to the SHD granted under ABP Ref. 307415 inclusive of revisions to the layout of block 1 and unit mix to facilitate an additional 3 no. units to provide for 1 no. studio, 89 no. 1 bed units, 105 no. 2 bed units and 8 no. 3 bed units – a total of 203 no. units.

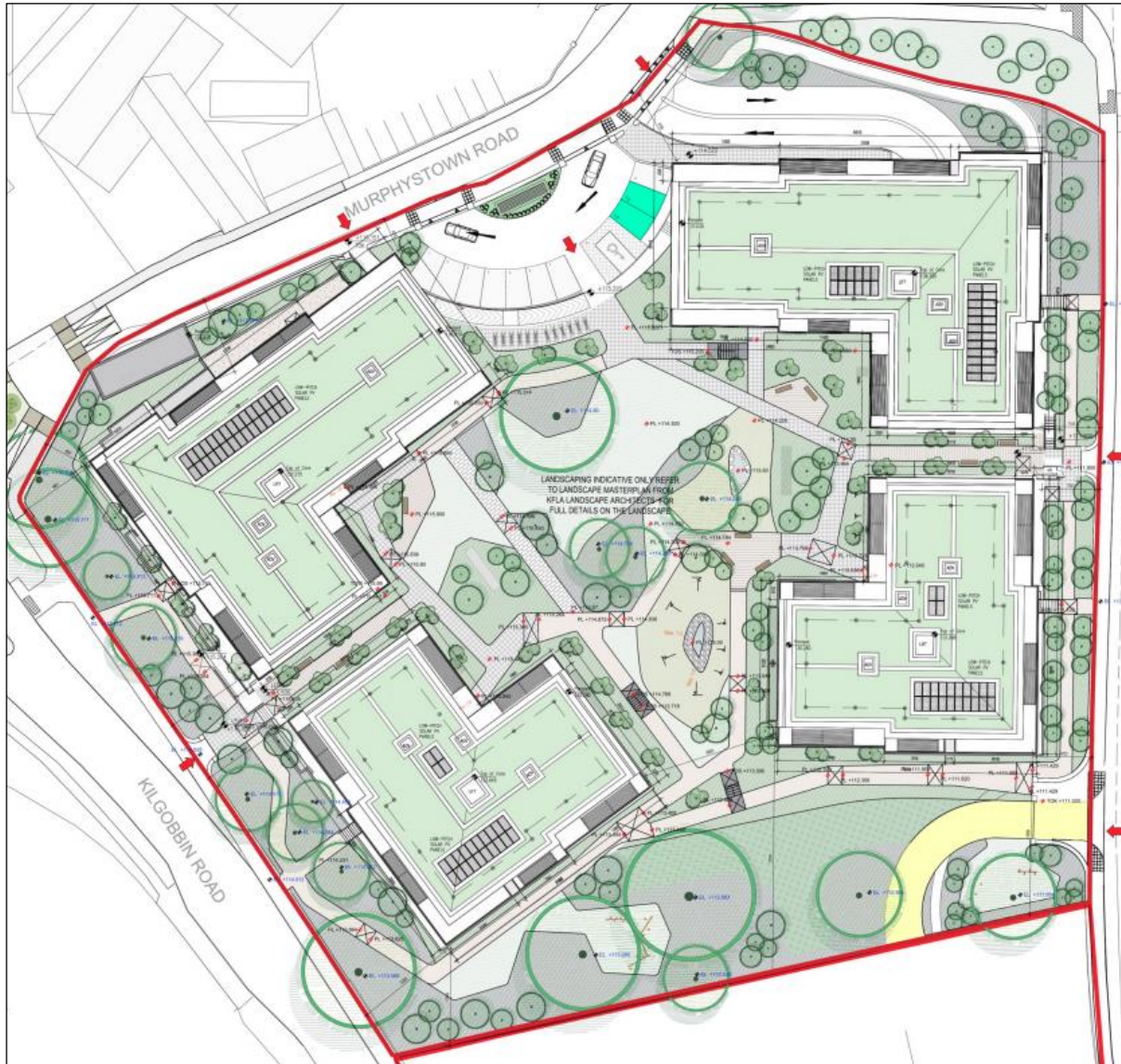


Figure 13.0 Site plan of the development as amended under Reg. Ref. LRD23A/0304.



Figure 14.0 Northern elevation of the development as amended under Reg. Ref. LRD23A/0304.



Figure 15.0 Western elevation of the development as amended under Reg. Ref. LRD23A/0304.

Murphystown Way, Dublin 18 (450m southeast of the subject site)

ABP Ref. 308227

Planning permission granted by An Bord Pleanála on 14th January 2021 for the construction of a Strategic Housing Development (SHD) of 249 no. units in 3 no. blocks with heights between 4-13 no. storeys and a creche.

The development granted under ABP Ref. 308227 is situated c. 450m to the southeast of the subject site. The development of 249 no. units results in a density of 250 no. units per hectare. As noted, the surrounding area typically comprises low-rise, low-density dwellings, however, recent changes in national planning guidance permits development at higher densities where it can be demonstrated that the lands are well-served by public transport, amenities and other services. With regard to the development granted under ABP Ref. 308227, and similarly with the subject site, the site is well-served by public transport which includes both Luas and Dublin Bus services, providing a frequent transport connection throughout the surrounding area and County. This connection provides future occupants with a high level of amenity and access to employment, education and other services to ensure a high quality of living. We refer to the following included in the Inspector's Report which notes this:

'The application site is a greenfield site within the Metropolitan area of Dublin and is located along the Luas Green Line, within c. 80m of the Glencairn Stop. There are also bus stops proximate to the site along Murphystown Way, serving the no. 46 and 118. Cycle lanes adjoin the site along Murphystown Way connecting the site to the north over the M50 to the Leopardstown/Central Park/Sandyford high employment and residential areas, with cycle lanes also travelling southeast along Murphystown Way alongside the Luas line, connecting the site to other residential developments, retail, commercial and community facilities. I am of the opinion that the delivery of residential development on this prime, underutilised, serviced site, in a compact form comprising higher density units would be consistent with policies and intended outcomes of current Government policy, specifically the NPF, which looks to secure more compact and sustainable urban development with at least half of new homes within Ireland's cities to be provided within the existing urban envelope (Objective 3b). I further consider the site to be well served by retail, commercial and community facilities, and will in turn support such services given the critical mass of population proposed'.

With regard to the subject site, it is noted that the site is served by Luas services c. 500 metres to the southeast as well as Dublin Bus services within 300 metres along Murphystown Way. As such, it is considered that the proposed density of 90.3 no. units per hectare is in keeping with the principles of proper planning and sustainable development as well as the merging pattern of development in the surrounding area.

While it is noted that the site adjoins lower-density residential units, the design and layout of the proposal has been developed to ensure the protection of existing residential amenities with regard to privacy and daylight access. As such, it is considered the proposal can be suitably accommodated at the subject site.



Figure 16.0 Site plan of the development granted under ABP Ref. 308227.



Figure 17.0 Northeastern elevation of the development granted under ABP Ref. 308227.

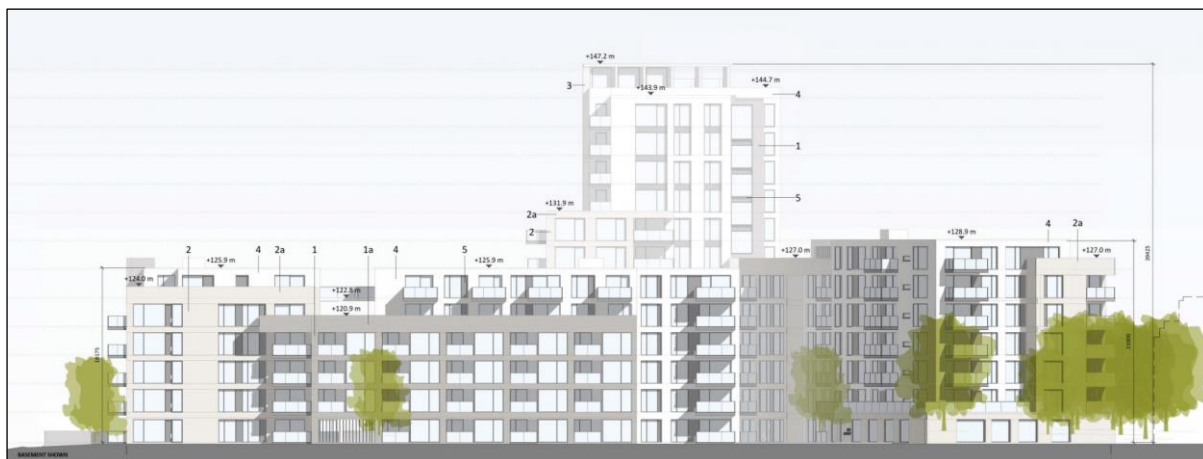


Figure 18.0 Southwestern elevation of the development granted under ABP Ref. 308227.

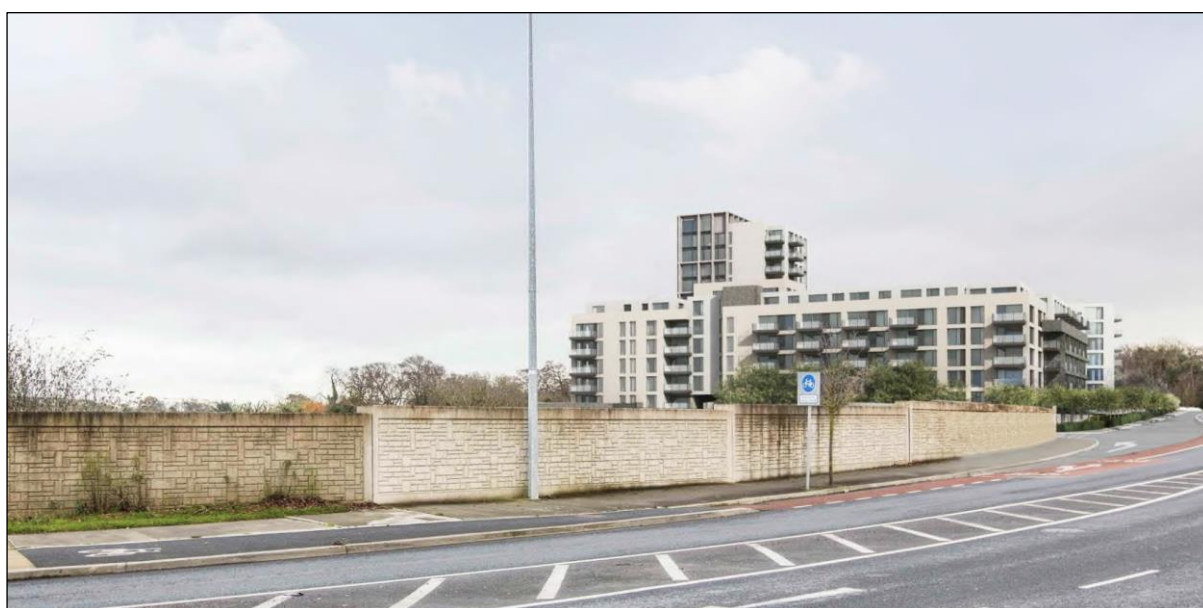


Figure 19.0 Photomontage of the development granted under ABP Ref. 308227.

Reg. Ref. LRD24A/0111

Planning permission granted by Dún Laoghaire-Rathdown County Council on 23rd May 2024 for alterations to the SHD granted under ABP Ref. 308227 inclusive of replacement of residential amenity space to provide 254 no. units.



Figure 20.0 Site plan of the development as amended under Reg. Ref. LRD24A/0111.

Crohamhurst, Sandyford Road, Dublin 18 (1km southwest of the subject site)

Reg. Ref. D23A/0456

Planning permission granted by Dún Laoghaire-Rathdown County Council for the demolition of the existing structures on site and the construction of a mixed-use neighbourhood centre and residential development in 3 no. blocks ranging in height from 3-6 storeys comprising 80 no. units.

With regard to the height of the development granted under Reg. Ref. D23A/0456 up to six storeys, the Council had considered the proposal with regard to the context of the site and emerging heights in the surrounding area. As such, the heights proposed were considered to be acceptable in the context of the site. As such, we would note the following commentary included in the Planner's Report:

'Other developments of c, 4-6 storeys in the vicinity of the subject site include those at, inter alia, Aikens Village and Belarmine to the south-east'.

'Accordingly, the proposed height for the subject apartment block is not deemed to comprise taller buildings as it will not exceed the prevailing permitted height of the area by more than 2 storeys set by BHS3 as a general height in residual suburban areas. Accordingly, it is not necessary to assess the scheme against Table 5.1 of the Development Plan's Height Strategy'.

'On foot of the above assessment, the Planning Authority does not consider that the proposed development gives rise to significant impacts related to the scale of development at the subject site. The scheme would not be fundamentally out of character with the surrounding area due by virtue of its height, bulk, massing and scale — nor by virtue of transition in height and scale'.

'Upon consideration of the application, the Planning Authority is generally satisfied that the proposed heights would accord with the proper planning and sustainable development of the area'.

With regard to the subject site, we would note that planning permission was granted by An Bord Pleanála under ABP Ref. 311669 for the construction of a residential development with heights of up to six storeys on a site which is situated to the southeast of the subject site. As such, it is considered that the proposed development is suitably scaled for the site, having regard to the context of the pattern of development in the surrounding area.

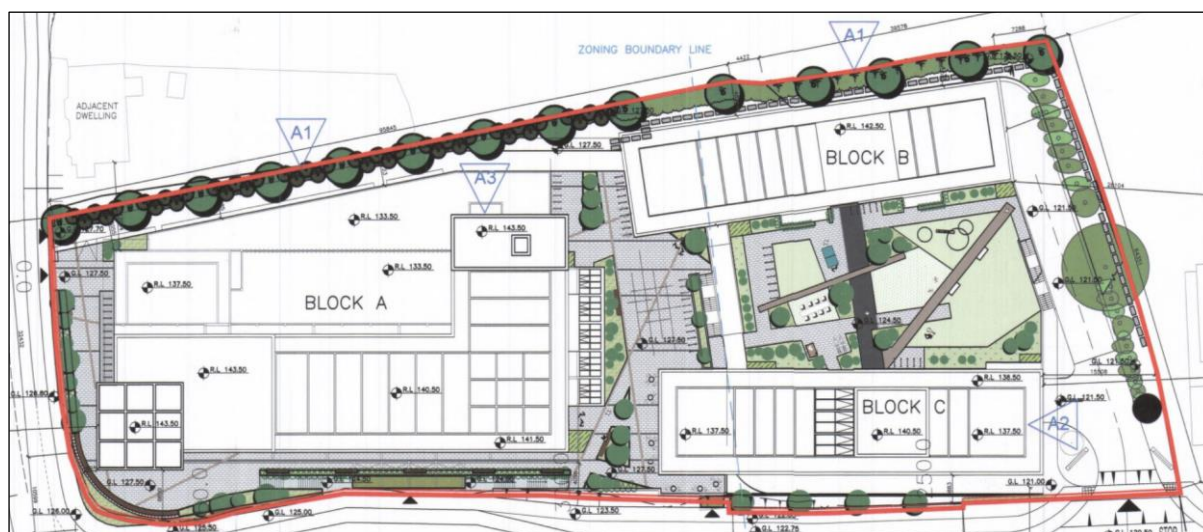


Figure 21.0 Site plan of the development granted under Reg. Ref. D23A/0456.



Figure 22.0 Eastern elevation of the development granted under Reg. Ref. D23A/0456.



Figure 23.0 Western elevation of the development granted under Reg. Ref. D23A/0456.

Site of c.0.84 ha at Rocklawn, Leopardstown Road, Dublin 18 (50m southeast of the subject site)

ABP Ref. 311669

Planning permission granted by An Bord Pleanála on 10th February 2022 for the construction of a Strategic Housing Development (SHD) of 112 no. units in 2 no. blocks with heights between 4-6 no. storeys.

The development granted under ABP Ref. 311669, with heights of up to six storeys, demonstrates the capacity of lands within the surrounding area of the subject site for additional development which increases building heights and densities from that which has traditionally been established as a low-rise low-density area. The development represents the capacity for lands to redevelop, utilising high-quality architecture and considered design to ensure the protection of existing residential and visual

amenities while providing additional accommodation on well-served, underutilised lands within the existing built-up footprint of Dublin.

With regard to density, we refer to the following commentary included in the Inspector's Report for that as granted under ABP Ref. 311669, which considers the development site's context regarding access to public transport and employment opportunities:

'The planning authority are not opposed to the residential density advanced by the applicant. In their view, the development plan supports residential density in excess of 50 units per hectare because the site is located closer than a kilometre from a Luas line, Policy RES3 of the development plan refers. The planning authority note that the site is around 550 metres from the Glencairn Luas stop and subject to appropriate design, a high residential density is supported at this location'.

'The application site is a greenfield infill site within the Metropolitan area of Dublin and is located close to the Luas Green Line, within 550m of a Luas Stop (Glencairn). A bus route (number 47) is close to the site, with cycle lanes adjoining the site along Leopardstown Road and on to Murphystown Way. There are existing commercial and community facilities within walking distance of the site and the site is also close to significant employment generators at Sandyford. Given the site's zoning, immediate context, and location proximate to a high capacity Luas line and to high density employment areas, I am of the opinion that the delivery of residential development on this prime, underutilised, serviced site, in a compact form comprising higher density units would be consistent with policies and intended outcomes of current Government policy'.

With regard to the subject site to which this report pertains, we would note the proximity to that as granted under ABP Ref. 311669. In this regard, it is considered that the proposed density of 90.3 no. units per hectare is acceptable due to the proximity to public transport and employment opportunities. It is, therefore, considered that the proposal is in keeping with the proper planning and sustainable development of the area as it promotes residential development on lands which are well-served and within the built-up footprint of Dublin.

Furthermore, we would note the height of the granted development at 4-6 storeys. Additional height is considered acceptable in an instance where due regard has been had for the context of the site which includes considering the potential impacts that development can have on existing visual and residential amenities. Well-considered design can provide additional development which protects existing amenities while increasing the County's housing stock, addressing an existing shortfall in housing.

With regard to the height of the granted development, the Inspector's Report acknowledged that the development would establish a new form of development for the site and immediate surrounds, however, considering the wider context of the site:

'I acknowledge that this will be a new form of development for the immediate area, but not uncommon to what has recently been permitted and is under construction in the wider area'.

As noted throughout the precedent section of this Planning Report, there is a clear emerging pattern of development in the area which has established increased heights and densities supported by the proximity to high-quality, frequent public transport and employment opportunities. With regard to the subject proposal, which is situated less than 50 metres from that as granted under ABP Ref. 311669, it is considered that the immediate area has established increased heights and densities in keeping with that as proposed. In this regard, it is considered that the proposal has been suitably design and scaled for this well-served and underutilised site.

In addition to the proposal being in keeping with the principle of development in the area, we would note that development must also ensure the protection of existing residential amenities. With regard to this in the context of that as granted under ABP ref. 311669, we would note the following included in the Inspector's Report:

‘The form, massing and height of the taller elements have been designed to provide adequate levels of daylight and sunlight for future occupants and the design has been sensitively arranged to provide adequate levels of sunlight/daylight to existing neighbouring properties’.

Regarding the subject proposal, we would refer to the daylight/sunlight analysis prepared by 3D Design Bureau demonstrating the protection of daylight access for neighbouring properties. We would also highlight the layout of the proposal which has considered the context of the site and surrounding area to ensure a proposal which provides a considered and coherent visual transition in height. Towards the west of the site, the proposal includes three-storey duplex units which adjoin the site of neighbouring properties which are of a low height and density. In addition to the protection of privacy and daylight access to existing properties, the proposal successfully integrates into the established streetscape, improving visual amenities and the interaction between the site and the public realm. The proposal is therefore considered to be suitably designed and scaled to protect existing amenities and to provide a high quality of living for future occupants.

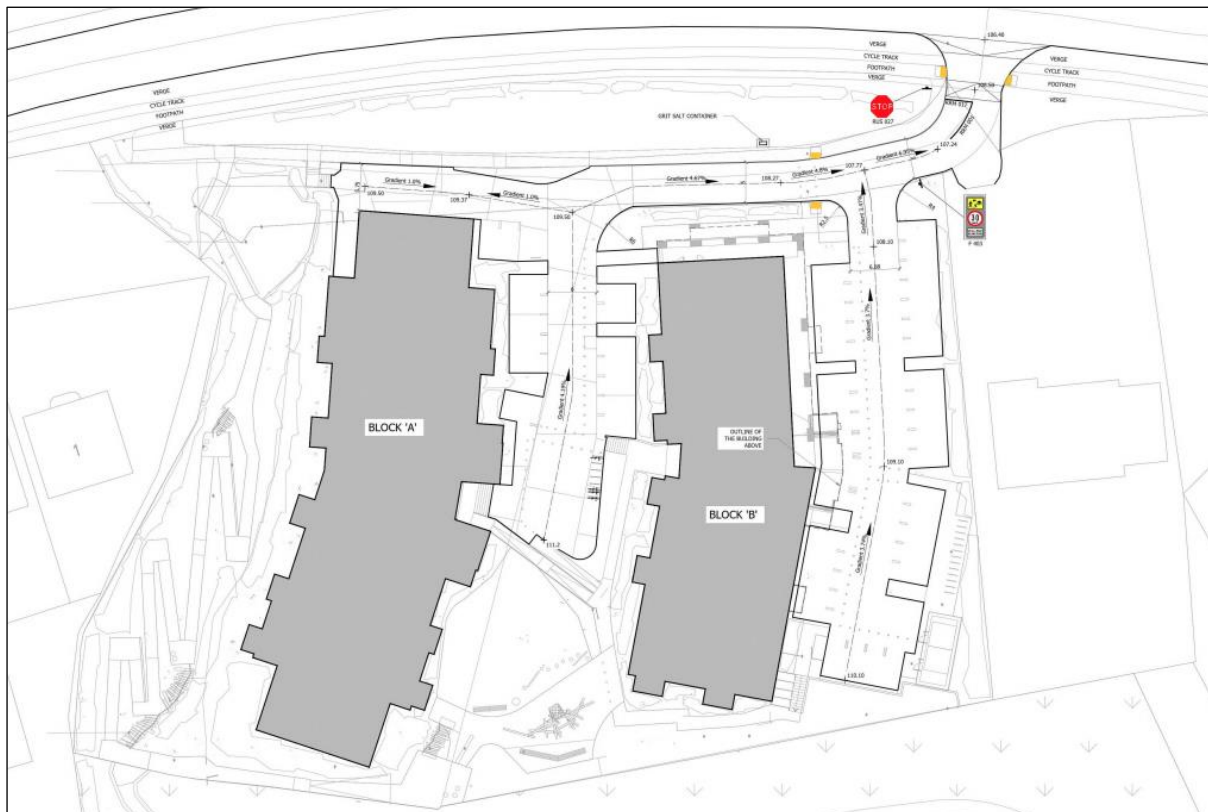


Figure 24.0 Site plan of the development granted under ABP Ref. 311669.



Figure 25.0 Northern elevation of the development granted under ABP Ref. 311669.



Figure 26.0 Southern elevation of the development granted under ABP Ref. 311669.



Figure 27.0 Eastern elevation of the development granted under ABP Ref. 311669.



Figure 28.0 Western elevation of the development granted under ABP Ref. 311669.

From a review of planning applications in the surrounding area, there is a clear precedent for development with heights and densities increasing from that as traditionally found in the area. Recent changes to planning guidance supports development within proximity to high-quality and frequent public transport and access to employment centres. Furthermore, in order to support a pattern of compact and consolidated development, utilising lands within the built-up footprint is prioritised as these areas are more likely to have existing infrastructure to support development. Additionally, this compact form of development alleviates urban sprawl, protecting undeveloped land.

This emerging pattern of development ensures that future occupants are provided with a high level of service and amenity due to existing and proposed infrastructure. Additionally, this additional housing improves housing choice in the County, providing new residents with better choices to meet varying needs and supporting vitality in communities.

Overall, it is considered that the proposal, which includes the construction of 80 no. units in 2 no. blocks of 3-6 no. storeys, is 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 demolition of the existing single-storey dwelling on site known as Residential Development at Leopardstown Road and the construction of 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and

10 no. three-beds in 2 no. blocks. The breakdown of the proposed development with regard to each block is detailed below.

Block 1

Block 1 of the proposed development is situated to the west of the site and is a 3-storey duplex block of 20 no. units comprising 10 no. two-bed/four-person and 10 no. three-bed/five-person units. Each unit at first floor level is provided with private amenity space in the form of a balcony and ground floor units are provided with a terrace to the front.



Figure 29.0 Front elevation of Block 1 of the proposed development.



Figure 30.0 Rear elevation of Block 1 of the proposed development.



Figure 31.0 Eastern (l) and western (r) elevations of Block 1 of the proposed development.

Block 2

Block 2 of the proposed development is situated in the centre of the site and is a part 5, part 6-storey block of 60 no. units comprising 31 no. one-beds, 18 no. two-bed/three-person and 11 no. two-bed/four-person units. Each unit is provided with private amenity space in the form of a balcony.



Figure 32.0 Northern elevation of Block 2 of the proposed development.



Figure 33.0 Southern elevation of Block 2 of the proposed development.



Figure 34.0 Eastern elevation of Block 2 of the proposed development.



Figure 35.0 Western elevation of Block 2 of the proposed development.

Overall, the site will be served by 64 no. car parking spaces, which includes 3 no. accessible parking spaces, 96 no. cycle parking spaces, 1769 sq.m public open space and 867 sq.m communal open space which includes 390 sq.m of play space situated to the northeast of the site. The proposal is considered compliant with local and national planning policy for residential development, 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 and the emerging pattern of development in the area, as established in Section 3.0 of this report. The proposed development with a density of 90.3 no. units per hectare is in keeping with other apartment developments in the surrounding area and is therefore considered suitable regarding the emerging pattern of development.

The suitability of the development for the site is evident through the layout of the proposal as we note that the lower, three-storey duplex units situated to the west of the site (Block 1) adjoin the site of a single-storey dwelling called Parc Clies. With the separation distance proposed from the site boundary, this design 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 ensures a high level of residential amenity to future occupants, inclusive of the provision of a high quantum of usable public and communal open spaces which have been designed to facilitate a variety of uses. Additionally, the landscape plan ensures a proposal which visually integrates into the surrounding area while enhancing the streetscape.

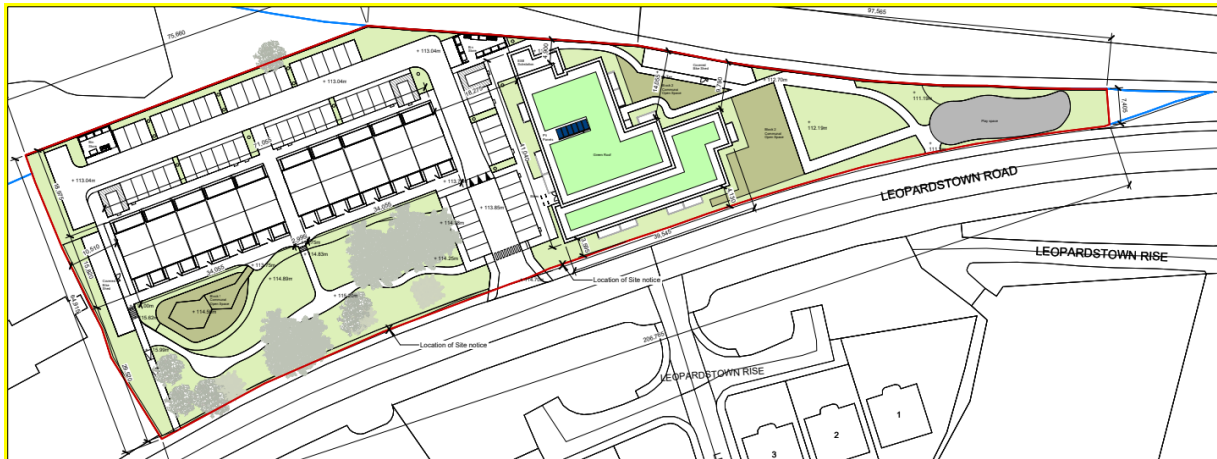


Figure 36.0 Site plan of the proposed development.



Figure 37.0 Northern contextual elevation of the proposed development.



Figure 38.0 Southern contextual elevation of the proposed development.

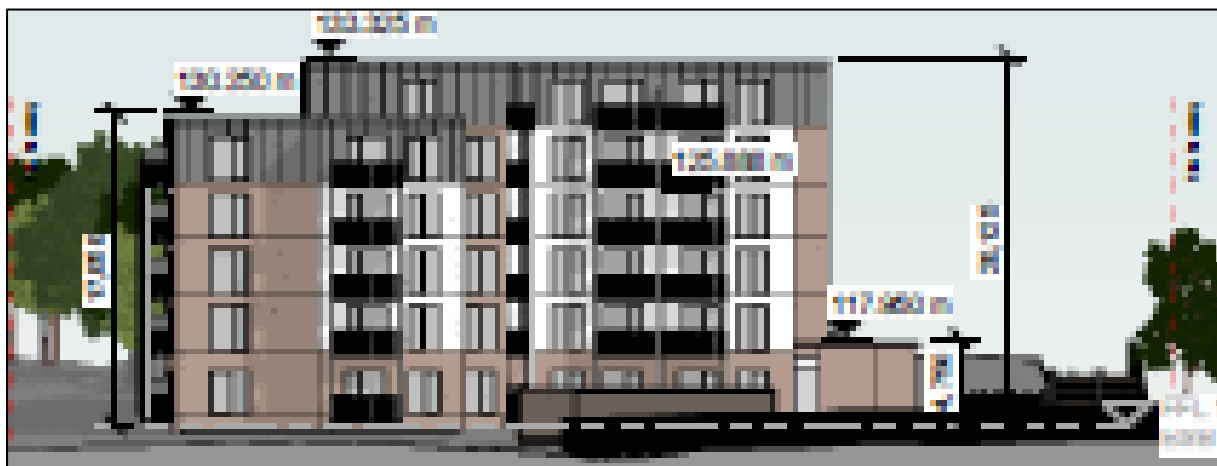


Figure 39.0 Eastern contextual elevation of the proposed development.

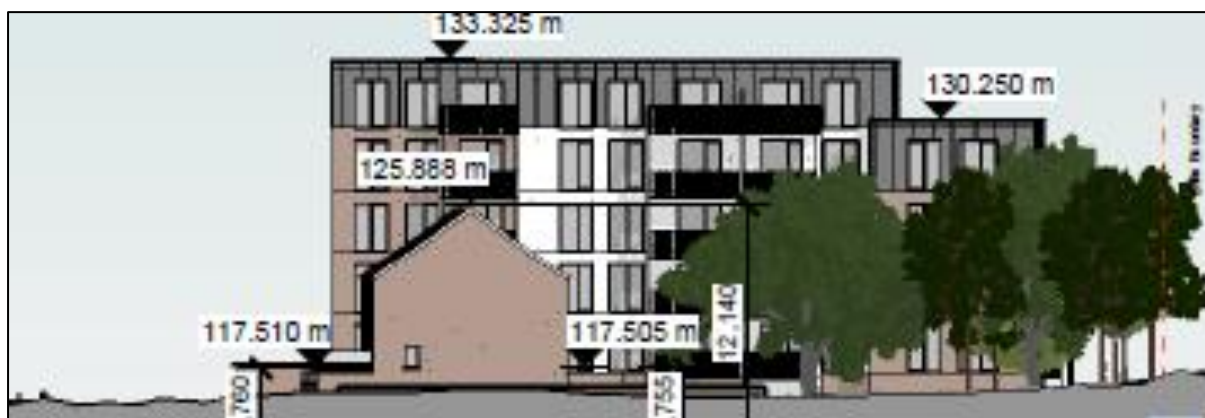


Figure 40.0 Western contextual elevation of the proposed development as viewed from Dundrum Road.

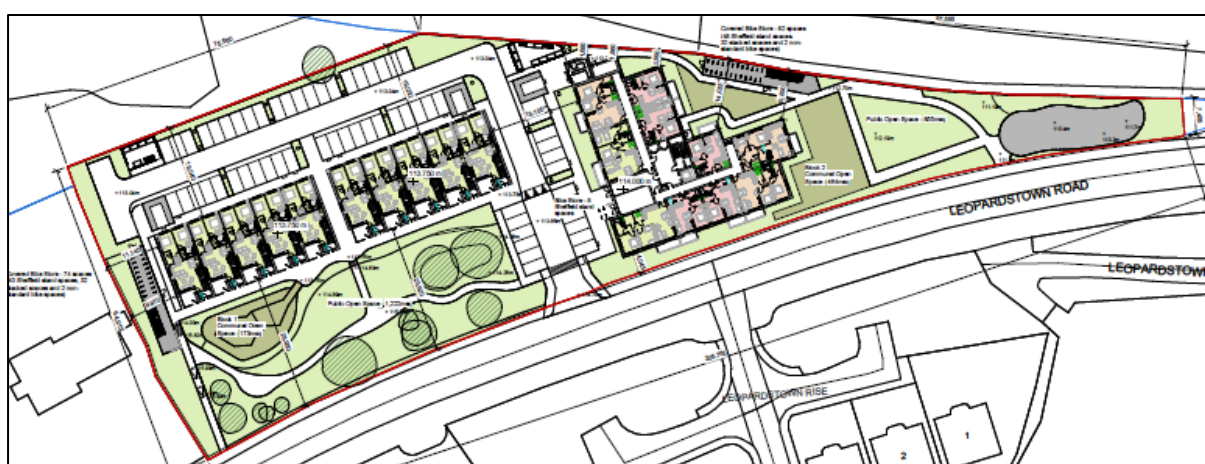


Figure 41.0 Ground floor plan of the proposed development.

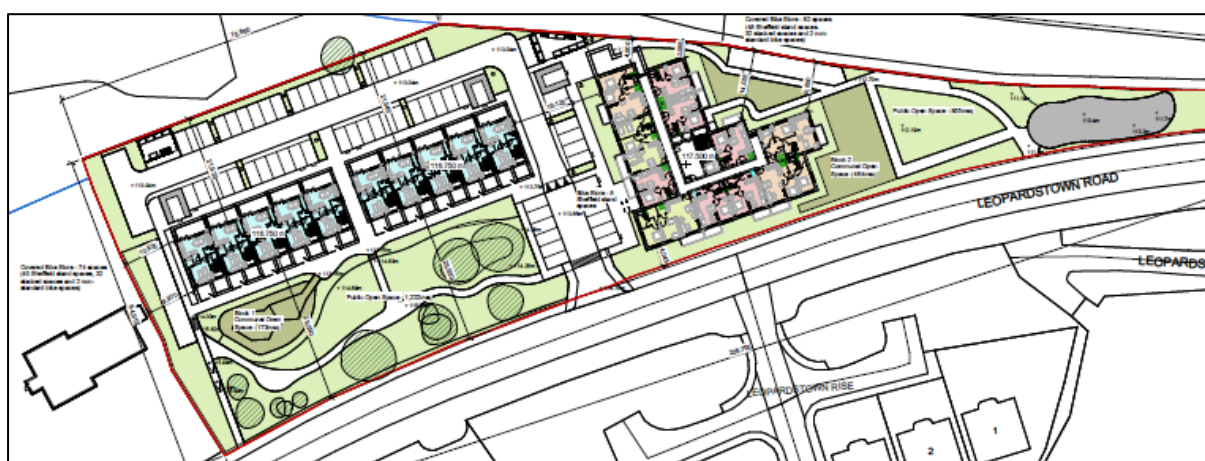


Figure 42.0 First floor plan of the proposed development.

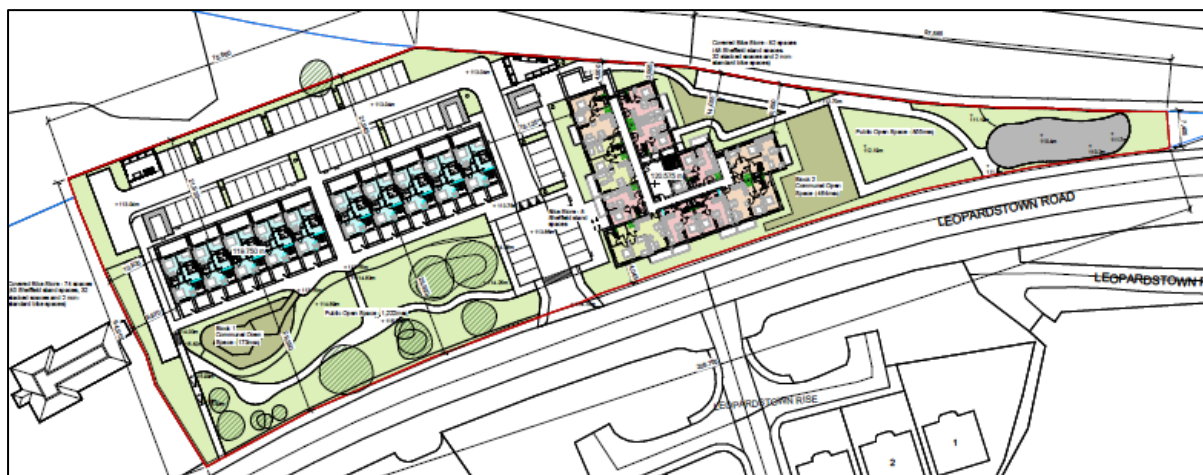


Figure 43.0 Second floor plan of the proposed development.

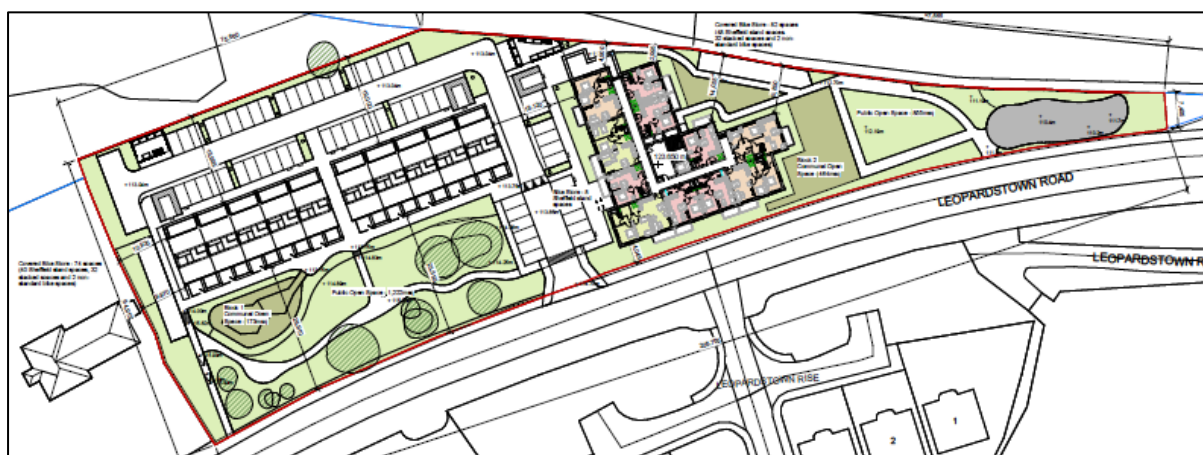


Figure 44.0 Third floor plan of the proposed development.

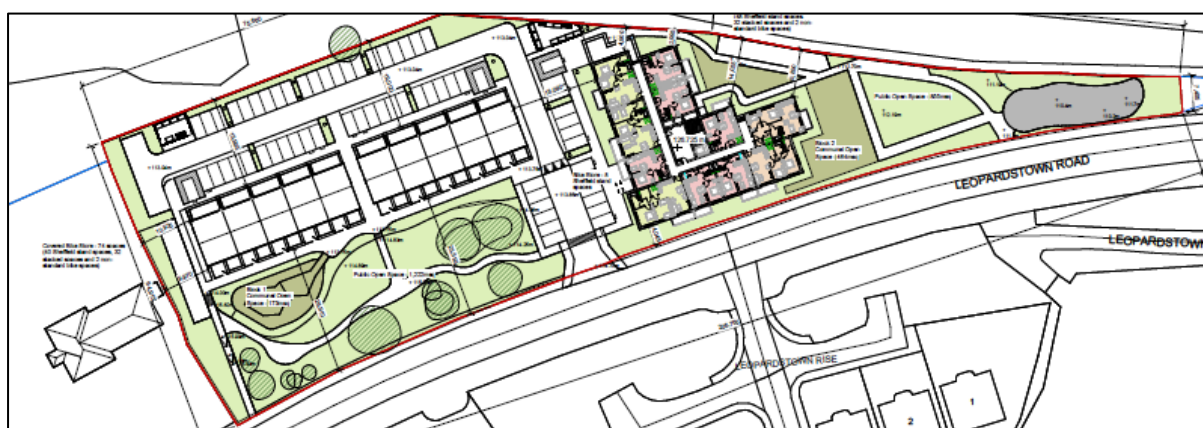


Figure 45.0 Fourth floor plan of the proposed development.



Figure 46.0 Fifth floor plan of the proposed development.

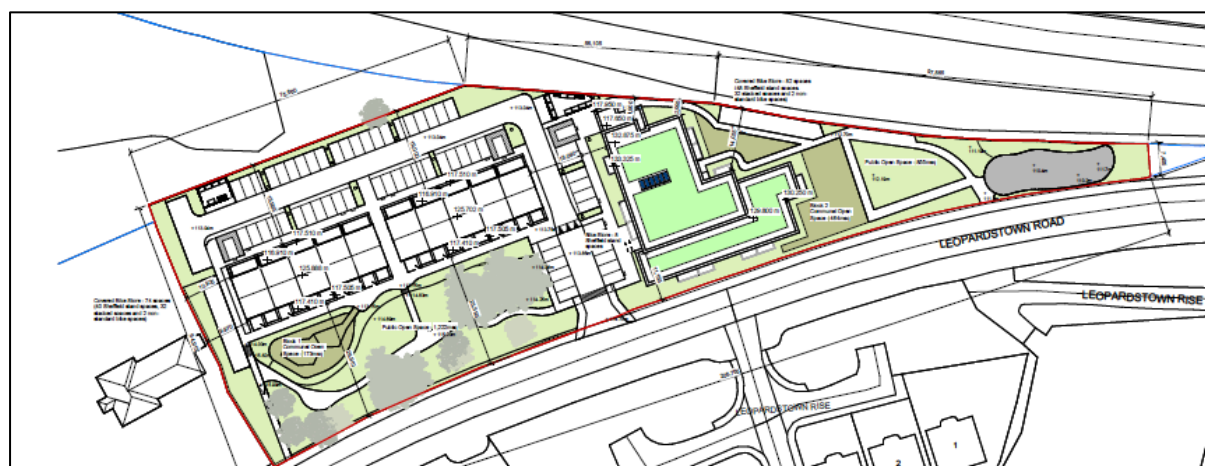


Figure 47.0 Roof plan of the proposed development.



Figure 48.0 Photomontage of the proposed development as viewed from the southwest of the site along Leopardstown Road.



Figure 49.0 Photomontage of the proposed development as viewed from the southeast of the site along Leopardstown Road.

5.0 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.

5.1 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 to provide additional residential accommodation. 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 the proposed blocks, which has considered the surrounding area. Block 1, which is situated to the west of the site and comprises 20 no. units in a three-storey duplex form, adjoins the site of a single-storey dwelling to the west. In addition to a c. 12m separation distance from the boundary of the site, the placement and massing of this block ensure the protection of existing amenities and allows for the successful integration of the proposed development into the context of the site by providing an appropriate buffer between the existing low-rise character of the surrounding area and increased density of the proposed development.

The taller element of the proposal is situated to the east of the site, where the site is provided with significant separation distances from existing dwellings, providing a sufficient transition space between the site's existing context and the proposed part 5, part 6-storey residential block (Blocks 2). The proposal comprises a varied housing typologies, supporting vitality in the community and addressing a variety of housing needs. There is an emerging pattern of development in the area for taller buildings and it is considered that the proposal is in keeping with this. We would particularly note the proximity of the SHD situated c. 50 metres to the southeast of the site granted under ABP Ref. 311669.

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.

5.2 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 80 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.

5.3 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 site in close proximity to amenities, services and employment centres. The provision of residential units on site, in the manner proposed under this Part 8 submission, results in increased housing units in the area 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.

5.4 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 Glencairn 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.

5.5 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).'*

The subject lands are considered to have 'High Capacity Public Transport Node or Interchange Accessibility' as defined by Table 2.8 of the Guidelines which states 'lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop'. As the site is within a 1km walking distance of the Glencairn Luas Stop, the site is considered to be at a suitable location for densities of up to 150 units per hectare.

The proposal, which intends to provide 80 no. units on a 0.8861 ha site, results in a density of 90.3 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 amenity. The proposal is considered to represent a compact and consolidated form of development as set out in the Guidelines, while protecting existing amenities.

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 site, 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 1769 sq.m of public open space throughout 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, Blocks 1 and 2 have a separation distance of 18.465m, exceeding the requirements of the Guidelines. Additionally, a separation distance of 12.110m has been provided between the western elevation of Block 1 and the site boundary. We would note that fenestration along the western elevation of Block 1 is kept minimal to protect the privacy of neighbouring properties. Additionally, it is noted that the dwelling which adjoins the site to the west does not comprise fenestration along the eastern elevation, which would oppose the proposed development. In this regard, it is noted that these considerations are sufficient to protect the existing residential amenities of neighbouring properties with regard to daylight access and privacy and demonstrate compliance with SPPR 1 of the Guidelines.



Figure 50.0 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 64 no. car parking spaces, which includes 3 no. accessible 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 80 no. units proposed, this results in a maximum car parking provision of 120 no. spaces. While the proposal results in a car parking provision of 0.8 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 bus and Luas services. Additionally, we would note that the car parking guidance set out in the Guidelines is maximum in nature, and therefore, it is suitable for the proposed development to provide a car parking quantum below this.

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 alternative means of 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 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds consists of 139 no. bedrooms, which would result in a cycle parking requirement of 139 no. spaces as per the Guidelines. The proposed development seeks to provide 156 no. bicycle parking spaces on site, which includes 4 no. non-standard bicycle parking spaces. The proposed development complies with the Guidelines in this regard.

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 1,769 sq.m of public open space, which includes 390 sq.m of play area to the northeast of the site. This represents c. 20% of the site area. Therefore, the proposal exceeds the required 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.



Figure 51.0 Public open space designation (green fill).

5.6 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 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds. One-bed units represent 39% of the total units. In this regard, the proposed development is 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 overleaf.

| Minimum Overall Required Floor Areas | | |
|--------------------------------------|-------------|------------------------|
| Unit Type | Requirement | Area of Proposed Units |
| One Bedroom | 45 sq.m | 48-49.7 sq.m |
| Two Bedroom (3 person) | 63 sq.m | 67.9-70 sq.m |
| Two Bedroom (4 person) | 73 sq.m | 73.2-81 sq.m |
| Three Bedroom (5 person) | 90 sq.m | 105.8 sq.m |

Table 1.0 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%)'.

The proposed development provides for 41 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 | 23 sq.m | 23-23.9 sq.m |
| Two Bedroom (3 person) | 28 sq.m | 28-29 sq.m |
| Two Bedroom (4 person) | 30 sq.m | 31.1-35.4 sq.m |
| Three Bedroom (5 person) | 34 sq.m | 34.4 sq.m |

Table 2.0 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 | 11.4-12.1 sq.m |
| Two Bedroom (3 person) | 20.1 sq.m | 20.1-22.5 sq.m |
| Two Bedroom (4 person) | 24.4 sq.m | 25.4-27 sq.m |
| Three Bedroom (5 person) | 31.5 sq.m | 32.4 sq.m |

Table 3.0 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 exceeds the requirement for 50% dual aspect with 66.25% 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 | 5 sq.m | 5.5 sq.m |
| Two Bedroom (3 person) | 6 sq.m | 6.1-6.2 sq.m |
| Two Bedroom (4 person) | 7 sq.m | 7.5-7.6 sq.m |
| Three Bedroom (5 person) | 9 sq.m | 16.1 sq.m |

Table 4.0 Table showing the provided private amenity space per apartment type.

Communal Amenity Space

| Minimum Floor Areas – Communal Amenity Space | | | |
|--|-------------------|----------------|----------------|
| Unit Type | Requirement | Total Required | Total Provided |
| One Bedroom | 5 sq.m x 31 = 155 | 500sq.m | 867sq.m |
| Two Bedroom (3 person) | 6 sq.m x 18 = 108 | | |
| Two Bedroom (4 person) | 7 sq.m x 21 = 147 | | |
| Three Bedroom | 9 sq.m x 10 = 90 | | |

Table 3.0 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 80 no. residential units are proposed to be provided with 64 no. car parking spaces at surface level. As the site is situated in an accessible urban location, it is considered that a reduced car parking provision 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 and 47 providing a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Sandycroft, Sandymount, Stepside and UCD. Additionally, the site is within a 10-minute walk of the Glencairn 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 suitable.

5.7 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 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 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 amenities 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 1 to the west of the site, which is a block of three-storey duplex units adjoining the site of a single-storey dwelling. In addition to separation distances from the site boundary, it is considered that the placement of this block to the west ensures a smooth visual transition from the typical low-rise character traditionally established in the surrounding area and the taller element of the proposed development. In addition to providing for a considered and coherent streetscape, this ensures the protection of existing residential amenities inclusive of privacy and daylight access. 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.





Figure 52.0 Photomontages of the proposed development as viewed from the southwest of the site along Leopardstown Road.

5.7.1 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.

5.7.1.1 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. The site is served by Dublin Bus Route Nos. 44 and 47 providing a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Sandymount, Stepside and UCD. Additionally, the site is within a 10-minute walk of the Glencairn Luas Stop, providing a frequent light rail connection to the city centre, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge.

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.

5.7.1.2 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 80 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.

5.7.1.3 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 1, situated to the west of the site, is three-storeys in height, where the subject site adjoins the site of a single-storey dwelling. Further to this, Block 2, situated to the east of the site which is part 5, part 6 storeys in height, has been scaled and situated on the site to ensure appropriate separation distances from neighbouring properties,

protecting daylight and visual amenities. Additionally, the height of the proposal is in keeping with a recently granted SHD of up to 6-storeys in height under ABP Ref. 311669. 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.

XX% 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.

5.8 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.

5.9 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, 1 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 80 no. units comprising a mix of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds is considered to have 49 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. We note the following from Section 2.4 of the Guidelines regarding 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.

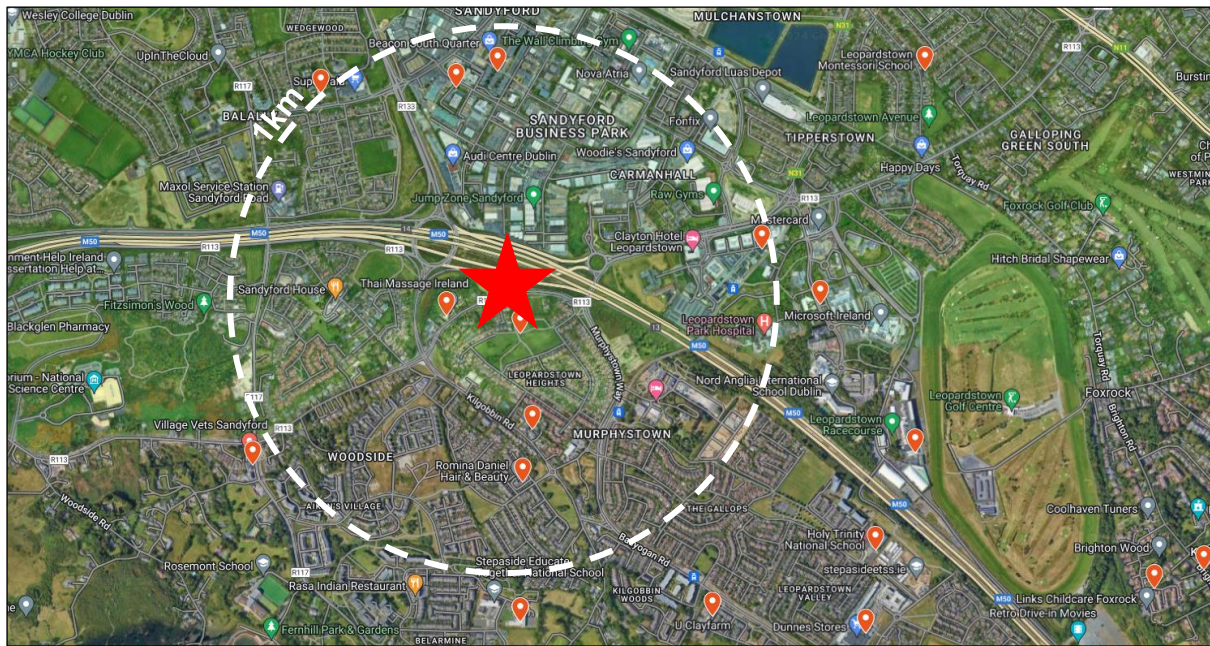


Figure 53.0 Aerial image of Tusla Early Years Services (orange markers) in proximity to the subject site (red star).

| Tusla Number | Service Name | Age Profile | Service Type | No. Of Children Service Can Accommodate |
|--------------|---------------------------------------|-------------|----------------------|---|
| TU2015DR030 | HandPrints Montessori PreSchool | 2 - 6 Years | Part Time, Sessional | 54 |
| TU2015DR079 | The Park Academy Beacon Court | 0 - 6 Years | Full Day | 143 |
| TU2015DR078 | The Park Academy Beacon South Quarter | 0 - 6 Years | Full Day | 115 |
| TU2015FL012 | Appleseeds Pre school | 2 - 6 Years | Sessional | 33 |
| TU2016DR016 | Park Montessori School | 2 - 6 Years | Sessional | 12 |
| TU2015DR154 | Giraffe Childcare Central Park | 0 - 6 Years | Full Day, Part Time | 84 |

Table 4.0 Details of Tusla Early Years Services within 1km of the subject site.

6.0 Local Planning Policy Context

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

6.1 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, 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.

6.1.1 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.

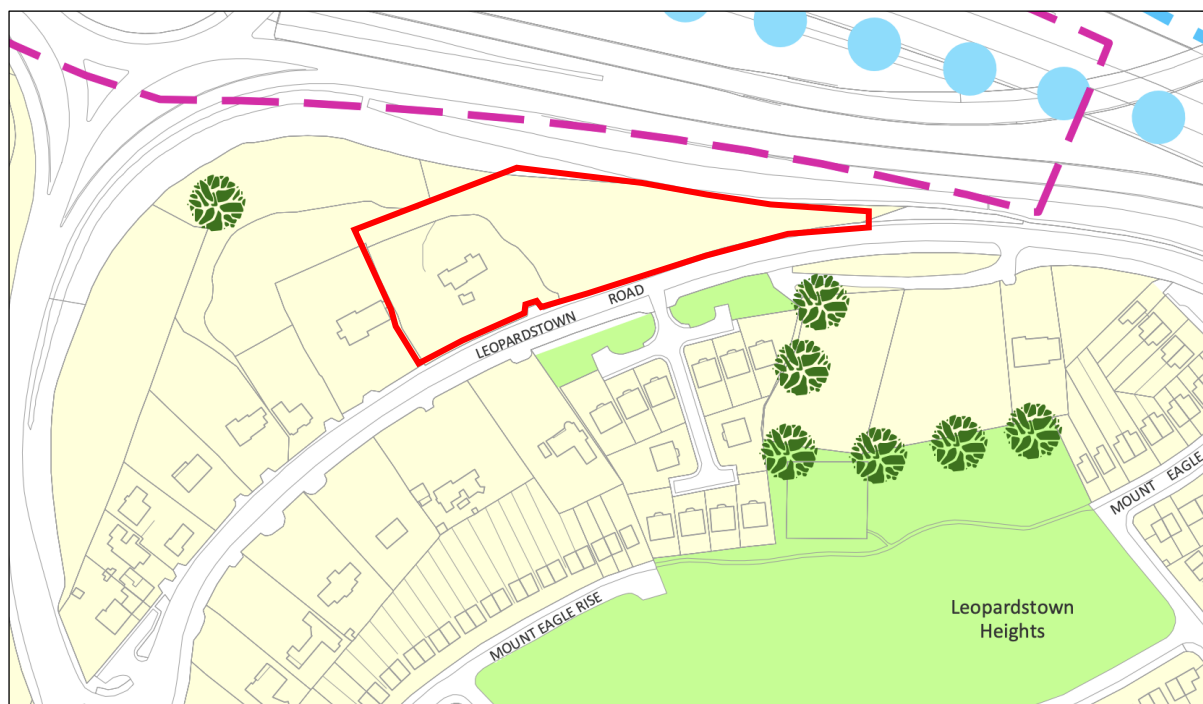


Figure 54.0 Extract from Zoning Map showing the subject site (outlined in red) zoned objective 'A' in the Dún Laoghaire-Rathdown County Development Plan 2022- 2028

As confirmed by the map included in Figure 54.0, 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).

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.

6.1.2 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 600 metres of the Glencairn Luas stop, a c. 10-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 90.3 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 90.3 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 90.3 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 three storeys to the west of the site where the site adjoins that of a single-storey dwelling and provides heights of part 5, part 6 storeys towards the east of the site, in keeping with an emerging pattern of development in the surrounding area. The design considerations with regard to massing to provide for a development with density above that as traditionally established in the surrounding area protect existing amenities of neighbouring properties will allow for additional development on a well-served site, in keeping with a compact development pattern.

Distances Block 1, to the west of the site, and neighbouring residential properties are provided to ensure a buffer/transition zone which avoids 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.

6.1.3 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 a developed area. 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.

6.1.4 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. We would note a number of recently permitted residential developments, as outlined in Section 3.0 of this report, which provide precedent for taller buildings in the subject area. These highlight how development of a larger scale than that traditionally found in the area surrounding the site can be facilitated, protecting existing amenities and the character of the area while improving housing options for the County. 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. It is submitted, therefore, that the proposed development represents the orderly planning and sustainable development of the area.



Figure 55.0 Photomontage of the proposed development as viewed from the southwest of the site along Leopardstown Road.



Figure 56.0 Photomontage of the proposed development as viewed from the southeast of the site along Leopardstown Road.

6.1.5 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 this application 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. In the instance where this has not been complied with, additional internal floor space has been provided to ensure high levels of residential amenity.

| 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 57.0 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 | 5 sq.m | 5.5 sq.m |
| Two Bedroom (3 person) | 6 sq.m | 6.1-6.2 sq.m |
| Two Bedroom (4 person) | 7 sq.m | 7.5-7.6 sq.m |
| Three Bedroom (5 person) | 9 sq.m | 16.1 sq.m |

Table 5.0 Table showing the provided private amenity space per apartment type.

6.1.6 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 80 no. units comprising a mix of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-bed units generate a communal open space requirement of 500 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 6.0.

| Minimum Floor Areas – Communal Amenity Space | | | |
|--|-------------------|----------------|----------------|
| Unit Type | Requirement | Total Required | Total Provided |
| One Bedroom | 5 sq.m x 31 = 155 | 500sq.m | 867sq.m |
| Two Bedroom (3 person) | 6 sq.m x 18 = 108 | | |
| Two Bedroom (4 person) | 7 sq.m x 21 = 147 | | |
| Three Bedroom | 9 sq.m x 10 = 90 | | |

Table 6.0 Table showing compliance with communal open space.

| 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 58.0 Table 12.9 – Communal Open Space Standards of the Development Plan.

6.1.7 Public Open Space

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 15% of the site area should be provided as communal open space. In this regard, we would note that c. 20% 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 59.0 Table 12.8 – Public Open Space Standards of the Development Plan.

6.1.8 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 7.0 Table showing Car Parking Zones and Standards as per Dún Laoghaire-Rathdown County Development Plan 2022- 2028.

The proposed residential development provides for 64 no. car parking spaces, 3 no. of which are provided as accessible parking spaces in compliance with Section 12.4.5.3 of the Development Plan which states that *'for both residential and non-residential car parking, 4% of car parking provision shall be suitable for use by disabled persons'*. 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 within 450 metres of the subject site along Sandyford Road and Murphystown Way. Additionally, the site is a 10-minute walk from the Glencairn Luas Stop. This public transport access provides a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Sandyford, Sandymount, Stepside and UCD, Cherrywood, Ranelagh, TUD Grangegorman and Broombridge. Due to the availability of public transport and proximity to employment centres, 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.

- *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 and 47 providing a frequent connection between the site and Ballyfermot, Crumlin, the city centre, DCU, Drumcondra, Dundrum, Enniskerry, Kiltiernan, Sandyford, Sandymount, Stepside and UCD. Additionally, the site is within a 10-minute walk of the Glencairn 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.*

The site is served by a footpath along Leopardstown Road, which provides a walking connection to bus and Luas services. Additionally, the site is situated opposite a two-way cycle lane, providing a connection throughout the surrounding area. As such, it is considered that the site has sufficient walking and cycling accessibility to justify a reduced car parking provision.

- *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.*

4 no. non-standard bicycle parking spaces are provided as part of the proposed development with the capacity to accommodate cargo bikes and e-bikes.

- *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 Leopardstown 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 60.0 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 1 is located to the west of the site. This

three-storey block adjoins the site of a single-storey dwelling and has been setback from the site boundary to ensure no impacts to existing amenities. The use of setbacks and suitable massing protect the existing property with regard to privacy and daylight access.

Block 2 is proposed to the east of the site. This block at part 5, part 6 storeys in height is L-shaped and ensures sufficient separation distances to protect the amenities of future occupants. As such, we would note a distance between Block 1 and 2 of 18.465 m which is considered appropriate to protect the amenities of future occupants of these blocks.

We would also note that, at present, the site does not facilitate overlooking Leopardstown Road. As overlooking is only provided on the southern side, at present, this can reduce feelings of comfort and safety. As such, it is considered that the passive surveillance provided by the development will increase feelings of safety and comfort, representing a positive interaction with the public realm. Additionally, a visually appealing palette of materials and an interesting façade have formed part of the design process to ensure a proposal that enhances the streetscape while providing additional residential development on this underutilised site.

- *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 80 no. units will be served by 64 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.*

On street parking is not provided in the immediate vicinity of the site.

- *Any specific sustainability measures being implemented*

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



Figure 61.0 SuDS Strategy.

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 non-standard bicycle parking spaces which can accommodate cargo bikes and e-bikes, 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 80 no. units generates a requirement of 96 no. cycle parking spaces comprising 80 no. long-stay spaces and 16 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 62.0 Extract from Table 4.1 – Cycle Parking for Residential Development of the Standards for Cycle Parking and Associated Cycling Facilities for New Developments (2018).

6.1.9 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 63.0 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 of 80 no. units comprises a mix of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds, we would note that three-bedroom units make up 12.5% of all 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 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, 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 64.0 which includes a map of the area within a 10-minute walking distance of the subject site and refer to Table 8.0 which includes the details of existing unit types.



Figure 64.0 10-minute walking distance from the subject site (red star).

| Existing | | |
|-------------------|--------------------------------------|--------------------------|
| Residential Ares | General Housing Type | General Housing Mix |
| Bearna Park | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Belmont | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Ferncarrig | Semi-detached dwellings | 3-bedroom dwellings |
| Hillcrest Road | Detached dwellings | 3/4-bedroom dwellings |
| Kilgobbin Road | Detached dwellings and apartments | 1/2/3-bedroom apartments |
| Leopardstown Rise | Detached dwellings | 5-bedroom dwellings |

| | | |
|--------------------|--|--|
| Leopardstown Road | Detached and terraced dwellings | 3/4-bedroom dwellings |
| Mount Eagle | Detached and semi-detached dwellings and apartments | 3-bedroom dwellings and 1/2/3-bedroom apartments |
| Old Kilgobbin Road | Apartments | N/A |
| Sandyford Road | Detached dwellings | 3/4-bedroom dwellings |
| Thornberry | Apartments, detached, semi-detached and terraced dwellings | 3/4-bedroom dwellings and 2-bedroom apartments |
| Woodward | Detached and semi-detached dwellings and apartments | 3/4/5-bedroom dwellings and 1/2/3 bedroom apartments |
| Bearna Park | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Belmont | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Ferncarrig | Semi-detached dwellings | 3-bedroom dwellings |
| Hillcrest Road | Detached dwellings | 3/4-bedroom dwellings |
| Kilgobbin Road | Detached dwellings and apartments | 1/2/3-bedroom apartments |
| Leopardstown Rise | Detached dwellings | 5-bedroom dwellings |
| Leopardstown Road | Detached and terraced dwellings | 3/4-bedroom dwellings |
| Mount Eagle | Detached and semi-detached dwellings and apartments | 3-bedroom dwellings and 1/2/3-bedroom apartments |
| Old Kilgobbin Road | Apartments | N/A |
| Sandyford Road | Detached dwellings | 3/4-bedroom dwellings |
| Thornberry | Apartments, detached, semi-detached and terraced dwellings | 3/4-bedroom dwellings and 2-bedroom apartments |
| Woodward | Detached and semi-detached dwellings and apartments | 3/4/5-bedroom dwellings and 1/2/3 bedroom apartments |
| Bearna Park | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Belmont | Detached and semi-detached dwellings | 3/4-bedroom dwellings |
| Ferncarrig | Semi-detached dwellings | 3-bedroom dwellings |
| Hillcrest Road | Detached dwellings | 3/4-bedroom dwellings |
| Kilgobbin Road | Detached dwellings and apartments | 1/2/3-bedroom apartments |
| Leopardstown Rise | Detached dwellings | 5-bedroom dwellings |

Table 8.0 Analysis of existing unit types within a 10-minute walk of the subject site.

| Permitted | | |
|------------------|----------------------|--------------------------|
| Residential Ares | General Housing Type | General Housing Mix |
| Murphystown Way | Apartments | 1/2/3-bedroom apartments |

| | | |
|----------|------------|------------------------|
| Rocklawn | Apartments | 1/2-bedroom apartments |
|----------|------------|------------------------|

Table 9.0 Analysis of permitted unit types within a 10-minute walk of the subject site.

The proposed development provides for 80 no. units comprising a mix of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds. We note that three-bedroom units make up 12.5% of all 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 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-beds. One-bed units represent 39% of the total units. In this regard, the proposed development is compliant 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 22.5% 2-person, 3 bed 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.

6.1.10 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, we refer to a number of planning applications recently granted planning permission in the area which demonstrate the capacity for taller buildings in the area. These are outlined in Section 3.0 of this report. With regard to the subject site, it is also considered that additional height can be provided in an instance 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 10.0.

| 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 80 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 a 10-minute walking distance of the Glencairn Luas Stop, providing a frequent high-capacity connection between the site, the city centre and surrounding areas. Additionally, the site is served by Dublin Bus Routes, providing additional connections to the surrounding area and throughout the County. |
| <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 Leopardstown Road and, in addition to the high-quality architecture proposed, will significantly enhance the public realm. The site adjoins a single-storey dwelling to the west, which has been considered throughout the design process and separation distances are provided to ensure the protection of existing amenities. We would also note that the subject site is opposite the site of a recently granted SHD under ABP Ref. 311669, which includes heights of up to 6 stories and, therefore, will appear visually compatible with the context of the surrounding area. |
| <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> | The site is not subject to any protected views. It is considered, however, that due to the design of the proposal, visual amenities will be enhanced and the streetscape improved. |
| <i>e. Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</i> | 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. |
| 2. At District/Neighbourhood/Street Level | |
| <i>a. Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</i> | 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 1 to the west of the site, which comprises three-storey duplex units, where the site adjoins a single-storey dwelling to the west. Additionally, Block 2, with heights of part 5, part 6-storeys, is situated to the east of the site and has been setback from the site boundaries to ensure the proposal integrates into the built environment. Furthermore, we note the placement of Block 1 to the east of the site, which overlooks Leopardstown Road, providing passive surveillance. In addition to this, we note an emerging pattern of development of increased |

| | |
|---|---|
| | heights in the immediate area with a recent grant of permission for an SHD under ABP Ref. 311669 with heights up to 6 storeys. As such, it is considered that the proposal will successfully integrate into the context of the site. |
| <i>b. Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</i> | 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. |
| <i>c. Proposal must show use of high quality, well considered materials.</i> | 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. |
| <i>d. Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</i> | The subject site does not comprise a thoroughfare. The proposal has been designed to ensure that the proposed pathways throughout the site 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 the urban design context for public spaces. |
| <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> | The proposed development interacts with Leopardstown Road, with Block 2 situated at the closest proximity. The design of the proposal is considered to be at a human scale, avoiding a proposal which appears overbearing. Due to the massing, façade considerations and palette of materials, it is considered that the proposal ensures a positive interaction with the street, improving the public realm. |
| <i>f. Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.</i> | 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 1769 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 80 no. residential units consisting of 31 no. one-beds, 18 no. two-bed (three-person), 21 no. two-bed (four-person) and 10 no. three-bed units addressing a variety |

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| | of housing needs and supporting a mixed community. |
| <i>g. Proposal should provide an appropriate level of enclosure of streets or spaces.</i> | As evidenced by the architectural drawings prepared for the development, the proposal ensures an appropriate level of enclosure of the internal street network as well as the provided communal amenity and public amenity spaces. Additionally, we would note that Block 2, situated to the east of the site, interacts with Leopardstown Road. This Block, which is set back 4.21 metres from the southern site boundary, is considered to enhance enclosure along Leopardstown Road, contributing to the streetscape. |
| <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> | 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 80 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. |
| <i>i. Proposal must make a positive contribution to the character and identity of the neighbourhood.</i> | 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. |
| <i>j. Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</i> | 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 1 to the west of the site, which comprises three-storey duplex units, where the site adjoins the |

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| | site of a single-storey dwelling. Additionally, Block 2, with a height of part 5, part 6 storeys, is situated to the east of the site and is situated on the site to protect the existing residential amenities adjoined by existing occupants. |
| 3. At site/building Scale | |
| <i>a. Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</i> | 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. XX% 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. |
| <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 1 of the proposed development is situated to the west of the site, which adjoins the site of a single-storey dwelling. In addition to the separation distances provided, the placement of this three-storey block of duplex units avoids overlooking neighbouring properties. The layout of the proposed development ensures the protection of existing residential amenities, inclusive of 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 or in the vicinity of a 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</i> | This criterion is not relevant to the subject site. |

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| <i>coastal towns and villages as opposed to the coastal corridor.</i> | |
| <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. |
| <i>d. Specific assessments such as assessment of microclimatic impacts such as down draft.</i> | This criterion is not relevant to the subject site. |
| <i>e. Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</i> | Due to the locational context of the subject site and the scale of the proposed development, it is not considered that the proposal will have an impact on sensitive bird/bat areas. |
| <i>f. Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</i> | The proposed development is not considered to be of a scale which could impact this. |
| <i>g. An assessment that the proposal maintains safe air navigation.</i> | The proposed development is not considered to be of a scale which could impact this. |
| <i>h. Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</i> | 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. |
| <i>i. Additional criteria for larger redevelopment sites with taller buildings</i> | The site of 0.8861 ha, providing for 80 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. |
| <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> | The proposed development comprises 2 no. blocks of varying scales with heights between 3-6 storeys, and setbacks introduced at upper levels of Block 2 ensure an appropriate massing and scale of development 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, while in keeping with the emerging pattern of development for taller buildings. |
| <i>k. For larger unconstrained redevelopment sties BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.</i> | We refer to the Daylight/Sunlight Analysis prepared by 3D Design Bureau, which details compliance with BRE guidance. |

Table 10.0 Compliance with the criteria of Table 5.1 – *Criteria for assessing proposals for increased height* of the Building Height strategy.

6.1.11 Noise

The subject site is situated in close proximity to the M50, as such, in order to ensure future occupants are provided with a high level of amenity, Wave Dynamics Acoustic Consultants have prepared an Acoustic Design Statement with a set of recommendations to mitigate noise impacts. The recommendations made in this Design Statement will be enacted, providing future occupants with a high-level amenity and provide for a proposal in keeping with Development Plan guidance. In this regard, we would note the following policy objective:

Policy Objective T27: Traffic Noise

It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.

Furthermore, we would also note the following included in the Development Plan:

'Along major transport corridors, the effect of traffic noise on the development must be considered and appropriate measures undertaken to mitigate the effect of noise. This should be considered in the context of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'.

The Acoustic Design Statement recommendations will be enacted to provide future occupants with a high-level amenity, ensuring that appropriate noise levels are maintained within each unit as well as throughout the site within communal and public open spaces. It is therefore considered that the proposal is in keeping with Development Plan guidance in this regard.

7.0 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:

'In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures have not been taken into account where these are to be implemented for the purposes of mitigating any effects on the environment which could have a potential impact on any Natura 2000 sites.

On the basis of the screening exercise carried out above, it was concluded that the possibility of any significant impacts on any Natura 2000 site, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available. In reaching that conclusion, it was not necessary to consider any measures to avoid or reduce the impact of the proposed development'.

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 note 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.

8.0 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.

9.0 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.

9.1 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 southeast of the site along Leopardstown Road.

9.2 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 south of the site and this will be the point for the proposal to connect into. Additionally, 2 no. fire hydrants will be installed on-site to ensure adequate coverage in the event of an emergency.

9.3 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.

9.4 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.

10.0 Noise

The proposed development is situated to the south of the M50. In order to ensure a high level of residential amenity and to avoid negative noise impacts associated with the proximity of the site to the M50, an Acoustic Design Statement has been prepared by Wave Dynamics Acoustic Consultants. The Acoustic Design Statement outlines the details of the full acoustic design assessment in line with ProPG guidance, which includes details on a good acoustic design process, an assessment of internal noise levels and external amenity spaces. In order to ensure a high level of amenity for future occupants, we note the following recommendation:

'To reduce the noise levels in the open amenity spaces on ground level of the development, it is recommended that a 2m solid boundary wall is built to the northern boundary of the site. In addition to reducing the noise levels in open amenity spaces as far as practical, there is also a local park located at Mount Eagle Drive within a 5 minute walk of the proposed development which is expected to achieve the ProPG desirable external amenity noise levels.'

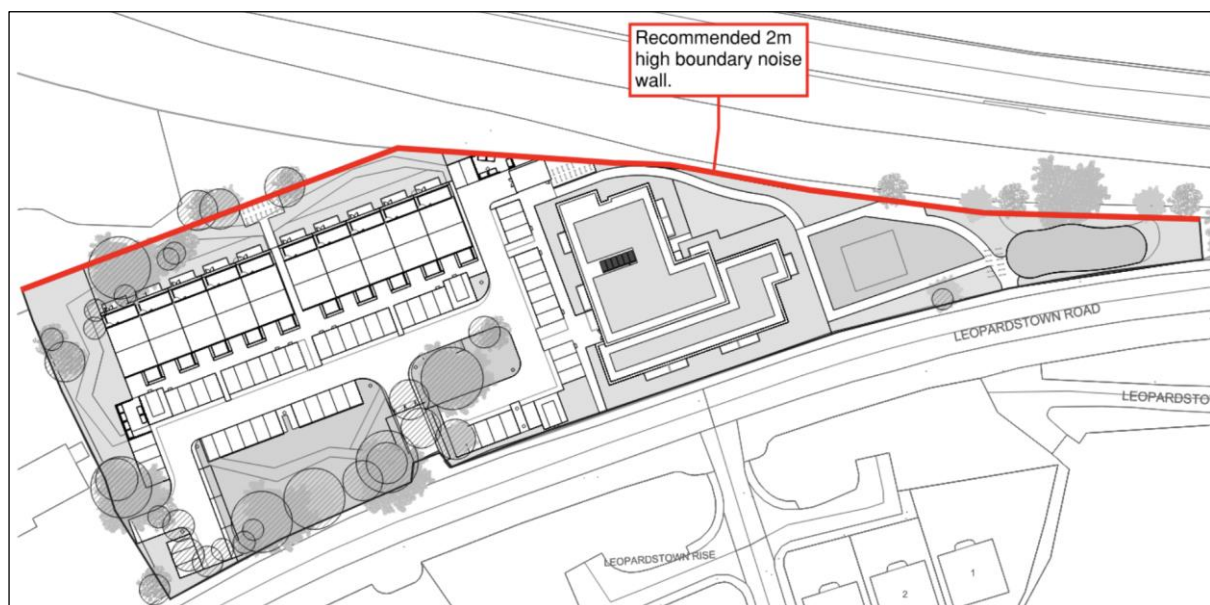


Figure 66.0 Extent of 2m high boundary noise wall.

Additionally, with regard to internal amenity, we refer to Figure 67.0, which includes an extract of Table 6 - *Sound Insulation performance requirements for glazed elements and ventilation* of the Acoustic Design Statement, detailing the glazed elements' sound insulation requirements of the proposed development to ensure high levels of amenity for future occupants.

| Façade | Glazed Elements (Frame & Glazing) Sound Insulation Requirements (Indicative requirements equal or approved) | | | | | | | Façade Ventilation Requirement ² |
|--------|---|--------|--------|---------|---------|---------|--|---|
| | Octave Band Frequency Requirements ¹ R dB | | | | | | Glazing Acoustic Performance dB R _w | |
| | 125 Hz | 250 Hz | 500 Hz | 1000 Hz | 2000 Hz | 4000 Hz | | |
| RED | 28 | 28 | 37 | 40 | 44 | 38 | 39dB R _w | Mechanical Ventilation |
| GREEN | 25 | 26 | 31 | 37 | 42 | 34 | 36dB R _w | Mechanical Ventilation |

Figure 67.0 Extract of Table 6 - *Sound Insulation performance requirements for glazed elements and ventilation* of the Acoustic Design Statement.

Due to the proximity of the site to the M50, the site has been identified as a medium to high risk for the daytime period and high risk for the nighttime period, and it is therefore recommended that mitigation measures are provided to control the onset noise levels. The proposal will ensure that all recommendations from the Acoustic Design Statement are enacted, providing future occupants with a high level of amenity and provide for a development which is in keeping with the proper planning and sustainable development of the area.

11.0 Conclusion

It is submitted that the proposed development, which comprises the construction of 80 no. residential units contained within two 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 these various levels, 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 Section 179 of the Planning and Development Act 2000 (as amended) and the Planning and Development (Part 8) 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,

A handwritten signature in blue ink, appearing to read 'KH', followed by a long horizontal flourish.

Kevin Hughes MIPI MRTPI
Director for HPDC