

Proposed Part 8 Residential Development
Lambs Cross

Planning Statement

Dún Laoghaire-Rathdown County Council

June 2024



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1.0 INTRODUCTION

1.1 Legislative Background

The Social Housing Public Private Partnership (PPP) Programme represents one of the many strands of delivery to increase the quantity of social housing and is supported as a delivery mechanism in 'Housing for All'. The success of this model for social housing delivery is evident as it has already provided 1,000 high-quality new homes, with another 3,500 in the pipeline. The proposed development is part of the fifth bundle of sites to be developed under this programme.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership, with the Local Authority. Under Section 179 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out prescribed development or a class of development, subject to compliance with the provisions of that section.

1.2 Background to the Part 8 proposal

The Social Housing PPP programme consists of the design, construction, financing and maintenance of approximately 3,000 homes in five project bundles of social housing developments on sites around Ireland to be delivered by Public Private Partnership (PPP). The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

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 an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the Part 8 consent), builds, finances and maintains the social housing units on behalf of the local authority subject to a contract. The maintenance and upkeep services are provided for a period of 25 years after construction. After this the units are returned to the local authority in good, pre-defined, condition.

The sites for this project always remain in State ownership and are made available to the PPP Company by way of a license. As the model is 'availability-based', the private sector partner is responsible for ensuring that units are available for occupation. The local authority is the landlord and is responsible for nominating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme.

Bundle 5 includes ten sites, two of which are in the administrative area of Dún Laoghaire-Rathdown County Council. Each site includes a mixture of housing typology (for example apartment, duplex, detached or semi-detached house) and site development works. The subject site proposes the development of 37 no. one and two bedroom apartment units.

1.3 Structure of Planning Report

This planning report was prepared on behalf of the NDFA and Dún Laoghaire-Rathdown County Council to accompany a Part 8 proposal for the development of 37 no. residential units on a gross site of circa 0.35 hectares in area, located in the townland of Balally, at Lamb's Cross, Dublin 18 situated at the junction of Sandyford Road and Hillcrest Road . This report is structured to provide:

- A description of the site and surrounding area, and of the proposed development.
- An outline of how the development complies with national policy, regional policy and local policy.
- An outline of the traffic and transportation consideration, drainage and water supply; and
- Provides a review of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

2.0 SITE DESCRIPTION AND SURROUNDING AREA

2.1 Location & Surroundings

The subject site is located adjacent to Lamb's Cross junction in Sandyford, extending to 0.35 hectares in area. The site is located north west (across the road) of an existing busy Neighbourhood Centre at the junction of Sandyford Road and Blackglen Road. This Neighbourhood Centre currently provides a convenience retail store, a butchers, a vet and a hairdressers.

The site currently consists of a parcel of disused open space which was formerly part of the wider network of fields in the area. In recent times this was used as a site compound for the storage of building material and equipment associated with the adjacent road improvement works to Balckglen Road running from Lamb Doyles further east as far as the crossroads intersection with Sandyford/ Enniskerry Roads. Once these works were complete in 2024, the site was cleared and a layer of hardcore now covers much its surface near the corner. A pallisade fence has been installed in the interim pending development running along the back of the newly installed footpath.

The area generally comprises of relatively low density residential development. However, the area is undergoing a period of transition, with a number of high density residential development proposals currently under consideration including a planning application directly across the Sandyford Road from the subject site (planning ref D23A/0456), recently granted by the planning authority but appealed by a third party to An Bord Pleanála. That development comprises a new neighbourhood centre and residential development including a supermarket and associated off licence; a restaurant / bar and associated winter garden; 2 no. retail units (a pharmacy and a beauty/hair salon); an ATM area; a health centre; café; and 80 no. residential units.

The M50 is located approximately 150m north of the subject site. The site is well served by existing community infrastructure and amenity spaces and is proximate to key locations in the County, providing employment and services, including:

- 2.8km from Dundrum Town Centre
- 1.4km from Stepside Village
- 1.8km from Sandyford Business District

From a road's perspective, the site has excellent access to the national road network, situated just west of the Kilgobbin Road which connects to the M50 at Junction 14 to the north east. Hillcrest Road fronting the site is being upgraded as part of the Blackglen Road Improvement Scheme, with a new footpath being provided adjoining the site.

The site is located on a Proposed Quality Bus Corridor with a bus stop located across the Sandyford Road from the subject site (stop no. 3491). The 44B bus route serves the site running from Glencullen

to Dundrum Luas Station with the 114 bus route running from Simon's Ridge to Blackrock DART Station. Both Dundrum LUAS Station & Blackrock DART Station have numerous bus routes to neighbouring districts as well as to Dublin City Centre.

Both Dundrum LUAS Station & Blackrock DART Station have numerous bus routes to neighbouring districts as well as to Dublin City Centre. Glencairn is the closest LUAS stop to the development and is located within 3 minutes' cycle or 20 minutes' walk. A park and ride facility is also available at Glencairn LUAS Stop.

Transport infrastructure in the area has recently undergone upgrade works by way of the Blackglan Road Improvement Scheme. Upon completion, the upgrade works will facilitate a Quality Bus Corridor which will integrate the proposed development with a network of radial and orbital bus routes with established high quality and increased frequency bus and rail routes with connections across Dublin City. The scheme includes new bus stops and cycle lanes along Sandyford Road which will directly enhance the accessibility and connectivity of the subject site, thereby enabling the delivery of residential units in accordance with national planning policy.

The new network will allow for better integration between bus routes and other public transport networks. This will allow for residents of the proposed development to be able to change between modes of public transport with ease and be able to access all areas of the city.

2.2 Site Description

The 0.35 hectare site is bounded to the west by Sandyford Road, to the south by Hillcrest Road, to the west by neighbouring housing and a private garden and to the north by housing in Lamb's Brook. The site is brownfield in nature having recently comprised a construction compound for road works to the Lamb's Cross junction and Sandyford Road as part of the Blackglan Road Improvement Scheme.

A small stream, Brewery Stream, passes the eastern point of the site, with a slow rate of flow, with a course that leads north under Sandyford Business Park, passing through Stillorgan and Blackrock and reaching the coast in Dublin Bay. The site is not subject to flooding and a Desktop Flood Risk Assessment confirms that the development is not anticipated to negatively affect the existing hydrological regime of the area or increase flood risk in other locations. The site is largely flat in nature at a level of approximately 125.00, falling sharply (5m) at its northeast and eastern flank towards the stream on its eastern boundary.

There are no pNHAs within the subject site. *Fitzsimon's Wood* pNHA is located approximately 220 m north-west of the site. There are no direct linkages between this habitat and the proposed development including its woodlands, heath or wetlands. An Archaeological Impact Assessment, prepared by John Purcell Archaeological Consultancy indicates that the development site, having no historic structures or archaeological remains and being largely disturbed, has a low potential for historic remains, thus requiring no further input for cultural heritage.

The subject site is zoned for "mixed use neighbourhood centre facilities" where the objective is; "to protect, provide for and or improve mixed-use neighbourhood centre facilities". The proposed development, when considered in conjunction with the existing neighbourhood retail facilities located across the road to the south (convenience retail store, a butchers, a vet and a hairdressers) and the proposed mixed use development on the neighbouring site to the west (planning reference D23A/0456) with particular regard to the extent of existing and permitted services and facilities provided therein, the

proposed development seeks to compliment and diversify uses in the area by providing for a mix of community and residential uses on the subject site.

The site is located within the Transition Zone of the Dublin Bay UNESCO Biosphere where sustainable social economic and community development is promoted.



Figure 1.0 Site Context

2.3 Planning History

A previous Part 8 Scheme was consented on the site in 2006 for the construction of 25 no. dwellings. Because there is no time limit associated with a Part 8 consent, the development of 25 no. dwellings still continues to have effect.

A number of other significant planning permissions have been granted in the surrounding area, clearly demonstrating that the subject site is located in a developing urban area and is under transition. From an assessment of the planning history pertaining to the subject lands, it is apparent that the area is evolving from an urban form perspective and there is clear precedence in the area which support the form, function and approach of development on the subject site. The scale and form proposed echoes what has been permitted on neighbouring lands to the north west and on lands across the Sandyford Road to the west.

Planning reference no. D23A/0456 – Cromahurst Neighbourhood Centre

A significant Largescale Residential Development proposal was recently granted planning permission by the planning authority and on appeal to An Bord Pleanála on a neighbouring site immediately across the Sandyford Road to the west. The permission granted provides for demolition of an existing single storey dwelling together with associated outbuildings at 'Cromahurst' to open up the lands to provide a neighbourhood centre and residential development in three no. new build Blocks A, B and C ranging between 3-6 storeys in height over part 1 and part 2 storey basement level. The proposed neighbourhood centre and residential development consists of 80 No. apartments (comprising of a mix of 22 no. 1-bed; 41 no. 2-bed and 17 no. 3-bed apartments); a supermarket and associated off licence; a restaurant / bar (430 m²) and associated winter garden; 2 No. retail units (a pharmacy of approx. 75 m² and a beauty/hair salon of approx. 33m²); an ATM area; health centre (85m²); and café. The proposed density is c. 104 units per hectare.

This permission is significant as it provides for mixed uses in support of the Neighbourhood Centre zoning afforded to the landbank surrounding Lamb's Cross junction.

Planning reference no. D17A/iOQ3 The Whinsfield Apartment Development

Permission was granted by the Planning Authority and upheld by the An Bord Pleanála (by decision dated 27 March 2019) for a residential development consisting of the demolition of the existing dwelling house and sheds and the construction of 65 no. apartments in 2 no. 5 storey blocks containing in total 4 no. one bed units, 50 no. two bed units and 11 no. three bed units. The development will also include a basement, on surface car parking, the construction of a new site entrance from the public road and all associated site and landscaping works on a 1.09 hectare site. The density of the scheme is 60 units/hectare.

Blackglan Road SHD (1) - ABP Ref: 313321

A decision is pending (overdue August 2022) for the demolition of existing structures on site and the construction of 101 no. residential units, creche and associated site works on a site of 1.93 ha. The density of the proposal is 64 units/hectare with building heights ranging from 2-4 storeys.

The Pastures. Sandyford Road – D21A/0595

Permission was granted by the Planning Authority and on appeal from An Bord Pleanála for a development proposing the demolition of an existing dwelling on site and the construction of 27 no. apartments in 2 blocks ranging in height from 3-5 storeys. The density of the proposed scheme is 85.44 units per hectare.

3.0 SITE SELECTION & CONSIDERATION OF ALTERNATIVES

3.1 Site Selection

The subject land is in the ownership of Dún Laoghaire-Rathdown County Council and therefore can be efficiently utilised to meet some of the unmet demand for social housing arising in the area. Site selection was restricted to consideration of that land in the ownership of the County Council, zoned for a development purpose and which could be adequately serviced and integrated to provide much needed social housing. The land may be categorised as urban development land, well serviced by infrastructure, public transport and community services. The site is not subject to any beneficial use

and is brownfield in nature having regard to its previous uses as a construction compound enabling road works. The objective is to maximise the development potential of the land in the interests of sustainable development and compact growth.

Site selection has had regard to the provisions of the Dún Laoghaire-Rathdown Development Plan 2022 – 2028, which seeks to address many issues associated with housing in the county, including housing need, improving social mix and catering for those with particular needs. Development of the subject site for residential and community use is consistent with, and responsive to the statutory land use and spatial development objectives for the site and for the wider area as set out in the Development Plan.

The site is zoned for mixed use neighbourhood centre facilities zoning. The objective is *“to protect, provide for and or improve mixed use neighbourhood centre facilities”*. Residential use is permitted in principle and is generally acceptable, subject to compliance with those objectives as set out in other chapters of the Development Plan. Whilst a community use is provided, there is no proposed commercial uses having regard to the level of existing and proposed neighbourhood facilities at Lamb’s Cross. Sandyford is identified in Figure 2.9 of the Development Plan as a Mixed-Use District in the Core Strategy. The proposed development will deliver an appropriately scaled level of residential development in this location and will contribute towards the housing target for the overall County over the Development Plan period, while also complementing the existing retail and retail services located on the subject site, which will provide a mixed-use location, commensurate with the NC zoning of the subject site.

The proposal has adopted a plan led approach to development, consistent with development in the existing environment.

3.2 Consideration of Housing Tenure & Type

The provision of social housing units on this site will facilitate diversity in tenure and facilitate housing mix in the area all in accordance with Objective PHP27 in the Development Plan. Section 12.3.3.1 of the Development Plan recognises that for Council own Part 8 or Part 10 schemes, the planning authority shall have regard to the needs of the social housing list of the Council when assessing mix requirements.

In examination of the delivery of 37 no. social apartment units, it is pertinent to consider existing tenure types within the Electoral Division (ED) of Dundrum - Balally. The Census of Population 2022 confirmed that there were 3,570 houses in the ED with 137 no. of these vacant or almost 4 per cent. Of the total 3,306 households in the ED, 85 per cent of the total housing stock is privately owned or rented. Only 14 per cent comprise social housing, either rented from the local authority or a voluntary housing body. The proposed addition of 37 no. units increases the total provision of social housing in the area to 14.8 per cent and when considered in conjunction with the proposed Part 8 Scheme located adjoining Balally Neighbourhood Centre (62 no. apartment units), the cumulative increase is 17.4 per cent.

If one takes a wider view of the surrounding neighbourhood and examines the EDs within 1 kilometre of the site, the situation is not dissimilar. According to the Census of Population 2022, there are 4,284 no. households within the defined area comprising 89 per cent of units in private ownership and 11 per cent of units rented from the local authority and / or voluntary body or occupied free of rent. Including the proposed development within the overall housing statistics does not substantially alter the provision of social housing in the area, only increasing social housing provision from 11 per cent to 11.7 per cent or 12.9 per cent when considered cumulatively within the area.

This ratio of private to social housing mix is considered acceptable on the plausible assumption that dominance by any single tenure should not exceed 50 per cent. Accordingly, the proposed development must be considered appropriate to the area providing for balanced and integrated housing tenure.

3.3 Consideration of Design

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high quality residential development, creating a sense of place for future residents, whilst integrating into the existing built environment. A number of site specific characteristics have influenced the overall design approach, including:

- Retention of the trees on the northern boundary of the site and vegetation in proximity to the Brewery Stream
- Integrated provision of SUDs and adoption of a nature based approach to provision and management.
- Animation of the ground floor fronting onto the junction of Sandyford Road and Hillcrest Road with the provision of a community building and public realm;
- Provision of substantial private and communal amenity space at podium level for the apartments
- Pursuit of a balanced approach to scale and form of development cognisant of the established and prevailing character of development in the area and future anticipated development already granted planning permission in proximity to the site.

4.0 NEED FOR DEVELOPMENT

The Dún Laoghaire-Rathdown County Development Plan (Chapter 4 Neighbourhood – People, Homes and Places) intends to accommodate the full spectrum of current and future housing needs of all members of society throughout the county. It aims to provide clear guidance on making provision for specialised housing requirements and addressing the needs of communities, ultimately delivering sustainable residential communities across the county.

The pressing need for social housing in Dún Laoghaire-Rathdown is clearly articulated in Section 2.5.2 of the Development Plan. The Housing Progress Report Q1 2023 provides relevant statistics for Dún Laoghaire-Rathdown up to the end of March 2023. This report confirms that the Social Housing Target 2022-2026 for delivery by the Council is 1,994 homes and the subject site is included in this delivery number with confirmation that the scheme is at Design/Tender stage. This ambitious target not only acknowledges but also emphasises the significant demand for social housing in the area.

The Housing Agency Guide delineates various methods through which social housing support is dispensed, reinforcing the pivotal role of local authorities in fulfilling these demands. As of 2023¹, there were 3,652 households on the Dún Laoghaire-Rathdown housing waiting list, a figure that, despite showing a decreasing trend in recent years, still represents a substantial and ongoing need for social housing. Of this number, there was a demand for 2,102 no. one bed units, 950 no. two bed units, 568 no. three bed units and 32 no. 4 bed units, reflecting the nuanced and specific requirements of the community and the absolute need for one bed units as proposed.

¹ *Housing List and Offers of Accommodation December 2023*

The proposed development of 37 no. units on site will only accommodate 1.0 per cent of the overall social housing demand in Dún Laoghaire-Rathdown and only seeks to deliver 1.8 per cent of the target supply between 2022 – 2026.

5.0 PROPOSED DEVELOPMENT

5.1 Development Description

The project details are contained in the proposed development drawings and ‘Architectural Design Statement’ prepared by the project Architect (MCORM); the Engineering Report and associated engineering documents prepared by the project Engineer Malone O’Regan and all other associated environmental reports.

The proposed development includes:

- i. 7 no. apartment units in a 3 - 5 storey building over undercroft area, including 29 no. one bed units; and 8 no. two bed units;
- ii. 1 no. community facility at ground floor of 171sqm;
- iii. Energy Centre at first floor level and external plant area set back at third floor level;
- iv. Undercroft area at lower ground level comprising (a) 2 no. ESB substations (b) car, bicycle and motorcycle parking; (c) bin storage; (d) bulk storage area; and (e) supporting mechanical, electrical and water infrastructure.
- v. Landscaping works including provision of (a) communal open space; and (b) public realm area fronting onto Sandyford Road and Hillcrest Road
- vi. All associated site development works including (a) vehicular access off Hillcrest Road; (b) public lighting; (c) varied site boundary treatment comprising walls and fencing; and (e) temporary construction signage.

The proposed development satisfies current Department of Housing, Local Government and Heritage’s specifications and Dún Laoghaire-Rathdown County Council’s housing standards as expressed through the Dún Laoghaire-Rathdown Development Plan 2022 – 2028. The following tables set out the principal detail of the proposed development in terms of landuse, residential numbers, general sizes, tenure and typology.

Tenure Type	Total No.	beds	No.	% of tenure	Unit Size (GFA) m ²	Total (GFA) m ²
Apartment	37	1 Bed	29	78%	50.4sqm	3,476.96sqm
		2 Bed	8	22%	77.76sqm	
Community Facility	1				171.6sqm	

Table 2.0: Development Areas

Gross Site Area (total site defined in red outline)	0.35 hectares
Communal Open Space	410sqm
Public Open Space	202sqm 5.7%
Density	126 d/ha
Height	3 – 5 stories over undercroft
Plot Ratio	1.018
Site Coverage	44.63%
Dual Aspect	54.05%

5.2 Design Approach

The architect's design statement enclosed with the planning application (in accordance with the requirements of Section 12.1.1.2 of the Development Plan) reflects and states the intention of the local authority through the proposed design, to deliver a high quality residential development that responds to the existing context and site constraints and which seeks to create an integrated and sustainable mixed use development when considered in conjunction with existing neighbouring developments and the pivotal location of the site at a key junction, namely Lamb's Cross. The design and layout adheres to best practice design principles responding to the physical constraints presented by the site.

The design approach provides for a 3 – 5 storey apartment block which wraps around the site in an east west direction, creating a strong frontage to the road and defining the corner of the junction. The building can be described as having two wings, running north and east, each being five storeys (tallest) concentrated at its corner. This faces onto the newly widened traffic intersection at the meeting point of Sandyford Road, Hillcrest Road, Blackglen Road and Enniskerry Road. From here the height steps to three storeys along its flanks running east and north, providing appropriate transition to existing adjacent housing. At its eastern end along Hillcrest Road there is a break in the building line to allow for an access point and to allow the existing topography of the site to remain undisturbed where it crops down toward the existing stream. A proposed community facility anchors the south western corner of the site, with proposals to enhance the public realm addressing the corner. The ground floor community space forms a small hub at this location, spilling out to a small public space providing welcome to the community and passers by. The community facility and the three ground floor have own door access from Hillcrest Road. The remaining apartment units are accessed via two separate cores to the east and west, with access from Sandyford Road and Hillcrest Road.

The proposed building height has been designed to take cognisance of the neighbourhood centre zoning on the land; the relationship of the site with the recently upgraded road network, recent precedence set by permitted development in the area, including development across the Sandyford Road from the application site; the Development Plan Appendix 5 Building Strategy; and the Urban Development and Building Height Guidelines 2018. The design of the blocks is contemporary in nature with glazing and high quality materials proposed. The massing of the blocks has been broken up, reducing the appearance of the overall development.

Vehicular access is provided to the development off Hillcrest Road at the south west corner of the site with access to the undercroft (lower ground level) at grade. Pedestrian and bicycle access is provided off Sandyford Road to the west with dedicated access to bike storage at grade.

The proposed development has been designed by the scheme's architects to ensure the highest degree of residential amenity is afforded to the prospective residents of the development and that the residential amenities of neighbouring residents are not adversely impacted. Coupled with this the scale, massing, height and positioning of the blocks within the site have been developed as such so as to mitigate any undue impacts on neighbouring properties. Design tools such as appropriate separation distances (marked on relevant architectural drawings), building set-backs at upper storeys, and soft boundary treatments (refer to the Landscape Masterplan) have been applied to safeguard the amenities of adjoining land users. A Daylight and Sunlight Analysis has also been undertaken as part of the rigorous approach to development on the site.

Residential Units

The architectural design of the apartment units adopts a contemporary distinctive use of simple geometry, proportions and material finishes, with external balconies providing individual units with private open space. The design presents an aesthetic visual and functional relationship between the residential units, the communal open space provided above the undercroft and nestled within the built form and the street. The apartment block consists of two cores serving apartments, achieving 54 per cent dual aspect units. Bulk storage facilities are provided for the units at undercroft level in accordance with requirements as detailed in Section 12.3.5.2 of the Development Plan. Building design will achieve A2 BER rating.

Community Facility

A community facility is provided comprising 171sqm of floorspace. Whilst the use of the facility has not yet been defined, it will be managed by the local authority for the delivery / benefit of the wider community.

5.3 Open Space & Landscaping

Given the restricted nature of the site limited public open space (5.7%) has been accommodated at the eastern extremity and at the front of the site, with a combination of soft and hard landscaping. However, over double the required quantum of secure, communal open space has been provided. Communal open space of 410sqm is provided in excess of the 217sqm required in accordance with the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023). This area will accommodate a toddler and younger child playground area in accordance with the requirements of the Guidelines and notwithstanding that only 8 no. two bed units are provided.

In addition to this open space provision a comprehensive landscaping scheme has been prepared with extensive groundcover and shrub planting maintained and provided to the east of the building integrating the Brewery Stream into the development. The southern facade presents a more civic character to Hillcrest Road, addressing the proposed community space as this will mark the main point of arrival into the development. This area combines hard landscaping, planting bays and accommodates external cycle parking areas. The proposal includes for comfortable pedestrian footpath, cycle lane, and a small plaza at Lambs cross junction, while respecting the local character.

The proposed development will necessitate the removal of all the scrub vegetation on the northern boundary of the site. The Leyland cypress hedge / tree planting which overhangs the site from the Lambs Brook housing development will be cut back to facilitate works and allow light to the residents in this area of the development. The mature sycamore #1 on the eastern boundary with the stream, along with the scrub bramble and willow will be retained and protected for the duration of the works. Whilst it is proposed to remove 9 no. trees of assorted quality including scrub bramble and crack willow, it is proposed to plant 42 no. trees of different and more substantive varieties as part of the development.

5.4 Parking

A total of 36 no. car parking spaces are provided, with 24 no. spaces provided in the undercroft of the building; 11 no. spaces provided at surface level for residents and 1 no. space provided for visitors to the development. This provides a car parking ratio of 0.97 per residential unit. In accordance with the requirement in the Development Plan (Section 12.4.11) to provide 20 per cent of car parking spaces within one fully functional EV Charging points and ducting for every space, a total of 7 no. EV Charging points have been provided. Provision is included in the car parking spaces provided for 2 no. disabled space in accordance with the requirements of Section 12.4.5.3 of the Plan. Provision has also been made for 2 no. motorcycle spaces in the undercroft in accordance with Section 12.4.7 of the Plan which requires a minimum of four or more motorcycle parking spaces per 100 (4%) car parking spaces.

A total of 71 no. bicycle parking spaces have been provided with 49 no. secure spaces provided at ground floor level within the building on the western façade and 2 no. spaces at surface level for visitors.. A total of 20 no. visitor spaces are provided at surface level, in accordance with SPRR 4 - Cycle and Storage, Sustainable Residential Development and Compact Settlements Guidelines for Local Authorities 2024 and in excess of the standards provided in the Development Plan, 'Standards for Cycling Parking & Associated Cycling Facilities for new Developments' 2018. Each bedspace has been provided with one long stay bicycle space and the community space has been provided with 20 no. spaces, that is 1 space per 5 no. employees. These spaces can also be used by short stay visitors to the apartment units. A Cycle Audit has been prepared by Malone O'Regan Engineers to accompany the development proposal.

A number of reports accompany the proposed development from a traffic management perspective including a Traffic Mobility Management Plan which concludes that the proposed development will not have a negative impact on the surrounding road network. It proposes an action plan to encourage more sustainable mobility patterns amongst the prospective residents. A public transport capacity audit has also been provided within the Traffic Mobility Management Plan to support the reduction in car parking provision on site.

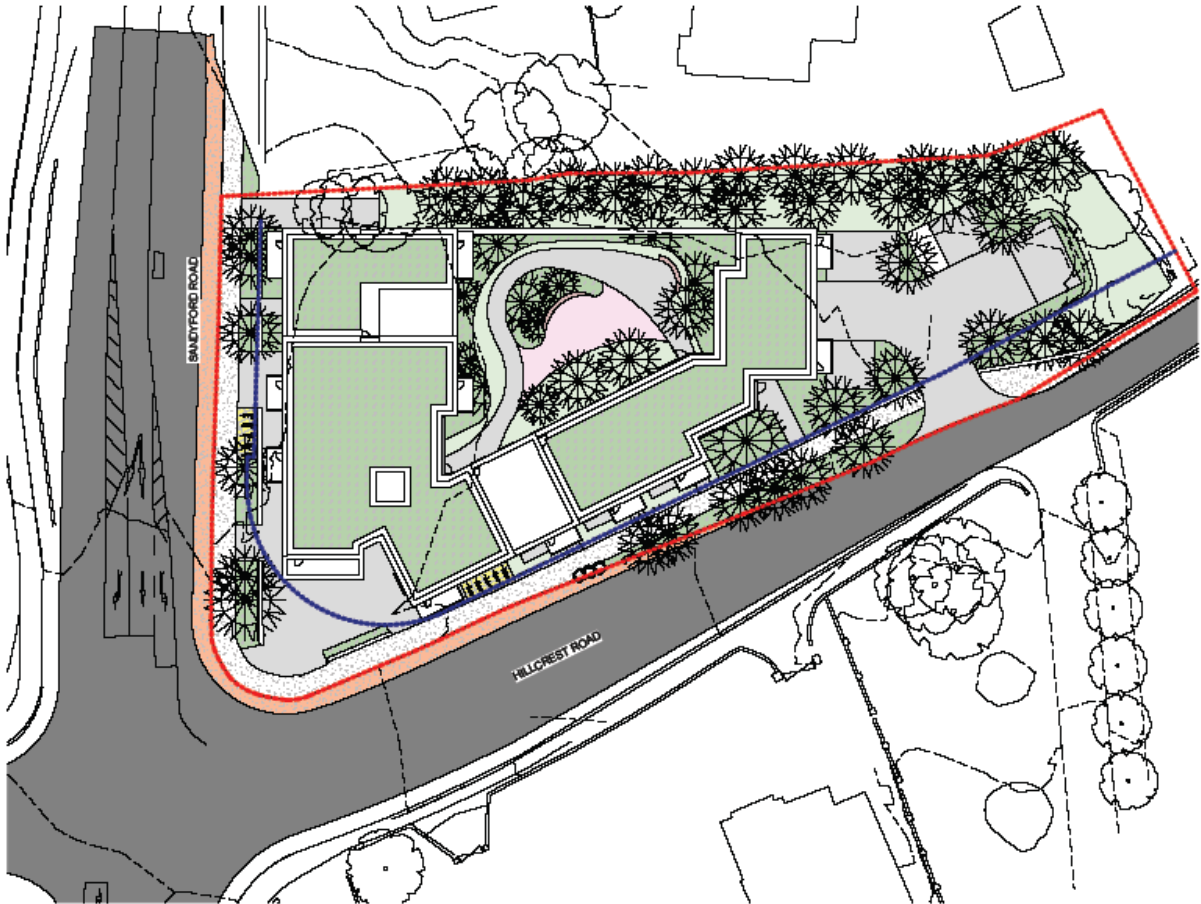


Figure 1.0 Proposed Site Layout

5.5 Water Services Infrastructure

An Engineering Services Report has been prepared by Malone O'Regan Engineers which details water service specifications. Uisce Eireann provided a Confirmation of Feasibility letter which stated that the proposed water connection was feasible without infrastructure upgrades and the wastewater connection was feasible subject to upgrades.

Foul Water

There is an existing 300mm diameter concrete sewer running parallel to the western boundary of the site, on the Sandyford Road (R117). These underground drains carry foul water towards existing treatment areas in the Dublin area. Due to the relative levels of the existing drainage within the road and the proposed site levels, it is possible to achieve a gravity connection to the foul water drainage pipework installed on the Sandyford Road. The average foul discharge rates for the proposed development is 0.225 l/s.

Potable Water

A 101.6mm diameter watermain is located running diagonally across the site. It is proposed to use this watermain and divert it around the new building as required. Total Daily Water Peak Demand is estimated to be 15,600 litres/day.

Surface Water

Due to the relative levels of the existing drainage within the road and the proposed site levels, it is not possible to achieve a gravity connection to the surface water drainage pipework installed at Sandyford Road and Blackglen Road. It is proposed to achieve a gravity connection toward the culvert at the northeast boundary of the site. Existing greenfield run-off of the development site will be calculated and used as the minimum benchmark for the SuDS design, thereby ensuring that the post development run-off will not exceed the greenfield run-off. The run-off calculation is based on the drained area of the new development. Surface water discharges will be retained within the various SuDS systems up to and including the 1 in 100-year event plus 20% for climate change. The proposed SuDS techniques are detailed on the planning drawings and include green and blue roofs, rain gardens and permeable paving. Attenuation storage is also provided on site using an attenuation tank located along the eastern boundary, under the site entrance road.

The SuDS measures not only replicate the pre-development surface water runoff systems and treatment for rainfall, but they also aim to replicate the existing habitats from the pre-development stage. The overflow from the attenuation tank is limited by a Hydrobrake flow control device which restricts the flow to 0.999 litres/s. The project is fully compliant with the Greater Dublin Drainage Study (GDDS), a policy document designed to provide for future drainage infrastructure in an integrated manner and to ensure long term improvement to the quality and quantity of storm water run-off in the capital.

5.6 Construction

Subject to securing consent, it is intended for the main works to commence in 2025. No 'out of the ordinary' construction processes have been identified or are expected. Shallow strip foundations are proposed to construct the units.

The timeline is indicative at this stage and is subject to change depending on consent approval, the tender process and other external factors including existing supply chain constraints at the time of going to market. It is assumed that all construction related activity will be undertaken in accordance with best practice / industry guidance and shall adhere to relevant emission, discharge and noise limit thresholds during construction. A Construction & Environmental Management Plan (CEMP) has been prepared in support of the development proposal and will be implemented by the appointed Contractors on site.

6.0 ENVIRONMENTAL CONSIDERATIONS

The development strategy and design approach has been influenced by a number of climatic and environmental variables and considerations on the site.

6.1 Sustainability & Climate Action

A Climate Action, Sustainability & Part L Compliance Report has been prepared by Semple McKillop Consulting Engineers. This report includes a Compliance Report on Part L & HC 12 Building Energy Rating Assignment and Compliance with TGD Part L of the Building Regulations. This report demonstrates compliance with a number of policy objectives in Chapter 3.0 of the Development Plan specifically relating to Climate Action.

The design team has adopted a top down pyramid approach to reduce the demand for energy by designing efficiency into the elements at design stage such as building fabric, glazing, air permeability, HVAC and lighting systems. Whilst the Energy Strategy for the site has yet to be finalised, as ultimately the PPP Company will develop their own proposals for the site, the report does provide output specification to set parameters to be achieved and details some systems that will not be allowed. In line with reducing fossil fuels there will be no fossil fuels (Gas or Oil) on the site in line with the Governments 'Climate Action Plan 2019'.

Maximum U-Values and an air tightness for the development are set out in the report which are higher than Part L but are seen as the first step in the Lean, Clean, Green approach implemented to use less energy. The report concludes that the development has the opportunity to deliver a low-cost solution for homeowners through a number of energy efficient, low emission sustainable solutions, in compliance with Policy Objective CA5, which supports high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing and new buildings, including retro fitting of energy efficiency measures in the existing building stock.

6.2 Ecology

There are no identified habitats or species of ecological note within the site. An Ecological Assessment of the site prepared by NM Ecology notes that the site has been used as a construction compound for the Blackglan Road Improvement Scheme. The majority of the site consists of compacted sediment, other than a treeline and patch of willow scrub along the northern boundary. Regular disturbance has prevented the establishment of vegetation in these areas. These areas are of negligible ecological importance.

Within a 15km radius of the site, there are no Natural Heritage Areas (NHAs) and 28 no. proposed Natural Heritage Areas (pNHAs). Fitzsimons Wood pNHA is the closest pNHA located 0.2km from the site. There are 2 no. Ramsar sites (Sandymount strand / Tolka Estuary 4.1km) and North Bull Island 8.5km). Additionally, the site is located within the Transition Zone of the Dublin Bay UNESCO Biosphere.

Given the distance of the subject site from the identified designated sites and the intervening urban development in the area, the EclA concludes that it is reasonable to conclude that no nationally designated sites will be affected by the proposed development.

Within the Transition zone of the Dublin Bay UNESCO Biosphere, development must take place in sustainable manner. The proposed development has adopted sustainability measures set out in the Development Plan and accordingly, the proposed development is not expected to have a significant impact on the Transition zone via direct pathways.

6.3 Landscape & Biodiversity

The Landscape & Biodiversity Design incorporates wildlife considerations in the retention/ protection/ management and reinforcement of existing hedgerows/treelines and undisturbed areas of grasslands. The approach to landscape design and management was informed by an Aboricultural Assessment undertaken by CMK Hort + Arb Ltd. to provide base-line data on the composition and condition of trees within the site. The report confirms that the longer-term management of trees on the northern boundaries would require thinning of poorer specimens and the retention of those trees with good long-term potential.

The proposed development will necessitate the removal of all the scrub vegetation on the northern boundary of the site. The Leyland cypress hedge / tree planting which overhangs the site from the Lambs Brook housing development will be cut back to facilitate works and allow light to the residents in this area of the development. The mature sycamore #1 on the eastern boundary with the stream, along with the scrub bramble and willow will be retained and protected for the duration of the works. Whilst it is proposed to remove 9 no. trees of assorted quality including scrub bramble and crack willow, it is proposed to plant 42 no. trees of different and more substantive varieties as part of the development.

Varied habitats are created for ecological connections and landscape visual amenity including:

- Bioretention tree planting pits;
- Rain Gardens
- New tree planting, and
- Flexible amenity lawn areas.

Planting and management of the landscape areas shall be undertaken in accordance with pollinator friendly management objectives as outlined in the “All Ireland Pollinator Plan 2021-2025. A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation.

6.4 Flood Risk Assessment

The purpose of the Flood Risk Assessment (FRA) prepared by Malone O’Regan Engineers is to assess the potential flood risk to the proposed development site and to assess the impact that the development as proposed may or may not have on the hydrological regime of the area in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). A small stream passes the eastern point of the site, with a slow rate of flow. The culvert under Hillcrest Road is small, measuring approx. 1m in width and 0.3 m in height. The watercourse is the Glasnalower / Brewery / Maretimo Stream, with a course that leads north under Sandyford Business Park, passing through Stillorgan and Blackrock and reaching the coast in Dublin Bay.

The Flood Study study was principally focused on examining flooding risks to the proposed site including fluvial and pluvial flood risk. According to the Desktop Flood Risk Assessment, the flood risk assessment mapping indicates that the proposed development site is not anticipated to negatively affect the existing hydrological regime of the area or increase flood risk in other locations.

6.5 Appropriate Assessment Screening

An Appropriate Assessment Screening Report prepared by NM Ecology has had regard to inter-alia; Part XAB of the Planning and Development Act 2000 (as amended) and appropriate best practice guidance including: ‘Assessment of Plans and Projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2001); and, Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government (DoEHLG, 2010).

The screening report concludes that the development site is not located within or directly adjacent to any Natura 2000 site. The nearest European site is the South Dublin Bay Special Area of Conservation (SAC), located 5.3 kilometers to the northeast and *outh Dublin Bay and River Tolka Estuary* SPA. The

Brewery Stream provides a potential surface water pathway between the site and the two European sites: the *South Dublin Bay SAC* and *South Dublin Bay and River Tolka Estuary SPA*.

The AA Screening Report, based on the basis of objective information, concluded that upon examination, analysis and evaluation of the relevant information and applying the precautionary principle, the possibility may be excluded that the proposed development could have a significant effect on any of the European sites. Considering the dilution capacity provided by 6 km of watercourse and the coastal waters of Dublin Bay, the AA Screening Report concludes that any pollutants generated at the site would be reduced to negligible concentrations before reaching the European sites. Therefore, there is no risk of significant effects and no European sites will be affected by the proposed development.

6.6 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening Report was prepared by HRA Planning to assess the proposed development and to undertake a determination as to the likelihood of significant effects on the environment, and the requirement or otherwise, for Environmental Impact Assessment (EIA). The proposed development of 37 no. dwelling units is below the 500-unit mandatory threshold and represents 7.4% of the threshold number of dwelling units.

The site area of the proposed development measuring circa 0.35 hectares in area is not situated within a business district and is significantly below the 10-hectare threshold for urban development³ in the case of; 'other parts of a built-up area'. The site, therefore, does not trigger mandatory EIA.

The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its 'nature and size' is likely to give rise to significant effects on the receiving environment, save for localised, short-term temporary impacts associated with the construction stage.

However, taking a precautionary approach and consistent with statutory provisions of Article 120 of the Planning Regulations, along with the published methodological guidance which this assessment is based; the information specified in Schedule 7A (of the aforementioned regulations) for the purposes of a screening determination was prepared.

The screening determination was therefore undertaken having regard to Schedule 7 criteria and Schedule 7A information. Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts;
- The potential impacts and proposed mitigation measures; and
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.

6.7 Acoustic Design Statement

An Acoustic Design Statement including an Inward Noise Impact, Construction Noise Assessment and Operational Noise Assessment was prepared by Wave Dynamics Acoustic Consultants for the proposed development.

In terms of Inward Noise, a Stage 1 and Stage 2 ProPG assessment were undertaken. Mitigation measures including sound insulation performance requirements for glazed elements and ventilation, are required to control the onset of noise levels. Break-in noise calculations to predict the internal noise levels from road traffic noise were conducted including future growth of the roads and the access ramp to the undercroft. Following the assessment, the building envelope performance requirements were determined to achieve adequate internal noise levels.

The external amenity spaces on the development include balconies and a communal amenity space at podium level were also assessed. The balconies on the southern, eastern, and western elevations of the development are predicted to be above the levels recommended in ProPG and BS 8233. However, alternative appropriate amenity has been provided within the development for these residents in the form of communal podium level amenity space, enclosed by the proposed building. This large open space is predicted to comply with the recommended external amenity noise criteria as outlined in ProPG and BS8233 as it benefits from screening of the apartment block itself.

Based on the recommendations in this report it is predicted that the internal and external noise levels will achieve the targeted noise levels in line with BS 82233:2014 and ProPG 2017 guidance.

The construction noise impact is predicted to exceed the BS 5228 requirements without any mitigation measures for the Site Set Up, Substructure and Superstructure stages of the project. General and site-specific mitigation measures are proposed to bring the construction noise levels down within the limits of BS 5228. Construction noise monitoring during the construction period is also recommended to manage construction noise. It is also recommended to erect vibration monitors during the substructure phase of the development.

With respect to operational noise, including noise generated in the communal amenity space and the traffic generated from the development and car parking, it is predicted that the development will not cause a negative noise impact on the nearby noise sensitive locations. The mechanical plant and equipment specification is not available at this stage of the project, as these projects will be design and build PPP projects. Specific noise limits have been provided for mechanical plant and equipment,

6.8 Daylight & Sunlight Analysis

A daylight/sunlight assessment by Digital Dimensions has been completed and their report is submitted in support of the proposed development. This includes assessing the daylight/sunlight levels received by neighbouring properties, the proposed residential units and the external amenity areas. It should be noted that there is dense tree growth along the southern boundary to No.12 Lamb's Brook which is not included in the assessment of sunlight to the existing windows as recommended in the BRE guidelines, due to the difficulty in accurately representing trees. The effect of the trees would result in lower levels of sunlight availability in the existing condition results and the effective reduction would be less. As noted in the Daylight & Sunlight Analysis report:

- There is a reduction to available daylight to some of the windows on the gable elevation of a neighbouring house No.12 Lamb's Brook. These windows are secondary to the room and they have other windows on a perpendicular wall. Taking the other windows serving the room into consideration, the area weighted average of the potential impact of these windows is not below 80% of the existing value. As a result any potential loss of light will be minor and minimal and meets the recommendations of the BRE guidelines BR209:2022 (third edition).

- One window serving No. 12 Lamb's Cross (window ID 1) has a reduction in winter sunlight hours below the recommended level, however, another window serving the same room achieves the target winter sunlight hours and meets the recommendations of the BRE guidelines. The remainder of the windows at ground and first floor level achieve the target APSH and WPSH.
- All the private amenity space to the surrounding properties will retain 2 hours sunlight over 50% of the area or will not be reduced below 80% of the existing levels. The proposed development meets the recommendations of the BRE guidelines.
- With respect to the proposed development, the results indicate that the Living, Dining, Kitchen and Bedroom spaces achieve high levels of daylight and they will be bright and pleasant.
- 35no. of the 37no. units (94.6%) have a living space that achieves the minimum recommended 1.5 direct sunlight hours. Additionally, units with dual aspect will receive sunlight to a bedroom space.
- The proposed private amenity space exceeds the BRE recommendation and the amenity space will exceed the minimum standard of sunlight required.

These favourable results suggest careful consideration to the design layout. The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development. The study shows very favourable levels of daylight in the vast majority of rooms indicating that they will have good access to daylight. These results can be attributed to the large windows and low surrounding context causing minor levels of obstructions.

In conclusion, it is the opinion of Digital Dimensions that the scheme is performing very well from an impact and scheme performance point of view.

7.0 NATIONAL POLICY & GUIDELINES

7.1 National Planning Framework – Project Ireland 2040

The National Planning Framework (NPF) published in February 2018 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. The emphasis within the NPF with respect to future development relates to managing the sustainable growth of compact cities, towns and villages to achieve effective density and consolidation supported by effective public transport infrastructure.

The NPF sets high level planning objectives (National Strategic Outcomes) in order to meet the national objectives, including:

- Compact Growth
- Enhanced Regional Accessibility
- Strengthened Rural Economies and Communities
- Sustainable Mobility
- A Strong Economy, supported by Enterprise, Innovation and Skills
- High-Quality International Connectivity
- Enhanced Amenities and Heritage
- Transition to a Low Carbon and Climate Resilient Society

- Sustainable Management of Water, Waste and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State. The NPF seeks to “*deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements*” (NPO 3a) and seeks to “*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*” (NPO 3b). It highlights the importance of development within existing urban areas by “*making better use of under-utilised land including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport*”.

The NPO’s promoting consolidation are further supported by NPO 11 which states that “*in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth*”.

The infill/brownfield targets set out in NPOs 3a, 3b and 3c of the NPF recognises the necessity for significant and sustained increase in urban housing output and in particular apartment type development. The NPF states that this is necessary, in order to avoid a continuation of the outward expansion of cities and larger urban areas. The NPF states that “*in many European countries, it is normal to see 40%-60% of households living in apartments*”.

NPO 33 seeks to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*”. NPO 4 seeks to “*ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*”. The proposed development provides for the creation of an attractive, high quality, sustainable new development within existing built-up urban area.

The proposed development complies with a number of the NPO’s within the NPF with particular regard to development within the existing built up footprint of a settlement. The proposed development is a strategically located underutilised site within the urban extent of Dublin city and suburbs and in proximity to Kilmacud Luas station and a significant employment centre, Sandyford Business Park.

7.2 Housing For All - A New Housing Plan for Ireland

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

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.

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

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

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croi Cdnaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will *"Introduce the Croi Conaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell."* In addition to this, the new fund will focus on *"activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers."* The fund will *"stimulate activation of existing planning permissions for build to-sell apartment developments of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes."*

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: *"Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.* Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: *"Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework."*

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

The subject proposal provides 37 new residential units which will contribute towards the government's target deliverance of 33,000 new residential units per year between 2021 and 2030.

7.3 Climate Action Plan 2024

On 20 December 2023, the Government launched its Climate Action Plan 2024 (CAP24) its third annual update to Ireland's Climate Action Plan 2019, the first CAP to be prepared under the Climate Action

and Low Carbon Development (Amendment) Act 2021 and following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings. The plan provides for the implementation of the carbon budgets and sectoral emissions ceilings and establishes a roadmap to halve national greenhouse gas emissions by 2030 and achieve net zero no later than 2050.

On the role of the public sector, CAP24 states the following:

“The public sector will play a leadership role in driving far-reaching climate action across its buildings, transport, waste, and energy usage, as well as wider society. This will include reducing emissions by 51% by 2030 and increasing the improvement in energy efficiency in the public sector from the 33% target in 2020 to 50% by 2030, as well as increasing climate literacy in the public sector, implementing green public procurement and retrofitting public sector buildings.”

CAP24 acknowledges the role of waste prevention and the circular economy in driving down greenhouse gas emissions *“through maximising the efficiency of our material use”*. It identifies key actions related to circular economy and waste, including the implementation of the WAPCE and Whole of Government Circular Economy Strategy, and the prevention of plastic, food, construction and commercial waste. It states that *“Avoiding waste in the first instance is a climate action we can take every day”*.

Chapter 14 of the CAP specifically addresses the role of built environment in decarbonisation. It notes that the sector accounted for 11.1% of Ireland’s greenhouse gases in 2022, down from 12.3% in 2021. The residential sector accounts for the majority of these – at 10.2% of total emissions. To play its part in achieving these targets, the residential sector will need to reduce its emissions by ~20% by 2025 relative to 2018 levels. CAP24 sets out key decarbonisation targets for the built environment sector as follows:

- All new dwellings designed and constructed to Nearly Zero Energy Building (NZEB) standard by 2025, and Zero Emission Building (ZEB) standard by 2030;
- Equivalent of 120,000 dwellings retrofitted to BER B2 or cost optimal equivalent by 2025, and 500,000 dwellings by 2030;
- Up to 0.8 TWh of district heating installed capacity by 2025, and up to 2.5 TWh by 2030;
- 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030
- 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030

This bundle of social housing is currently programmed to deliver homes to be occupied by 2026. Under the 25-year PPP Company maintenance agreement, this means that the homes will be returned to the State after 2050 which coincides with the target date for reaching carbon neutrality. The Climate Action, Sustainability & Part L Compliance Report, prepared by Semple McKillop Consulting Engineers as detailed in Section 6.1 of this report acknowledges that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions. The houses and apartments will be energy efficient and meet current Building Regs and NZEB requirements, achieving a BER A2 for dwellings.

7.4 Ministerial Guidelines

A number of national planning guidelines may be considered of relevance to the development proposal, including:

- Guidelines for Planning Authorities on Childcare Facilities (2001)

- Design Manual for Quality Housing (2022)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024
- Urban Design Manual - A Best Practice Guide (2009)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights- Guidelines for Planning Authorities (2018)

Those of particular relevance to the proposed development are detailed below.

Childcare Facilities – Guidelines for Planning Authorities 2001

Section 2.4 of the Guidelines details appropriate locations for childcare facilities and requires that one childcare facility is provided for every 75 units. A Social Infrastructure Audit has been undertaken by HRA Planning and accompanies the proposed development under separate cover. It deals with childcare provision in the area and the requirements generated by the proposed development.

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities nuances the childcare requirement by stating 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’*. One-bedroom units are excluded for the purposes of calculating requirements.

The provision of 37 no. units incorporating 29 no.1 bed units and 8 no. 2 bed units is well below the threshold for consideration of a requirement for a childcare facility under the Childcare Facilities Guidelines for Planning Authorities (2001). For the purposes of this assessment, the provisions of the Childcare Guidelines are adopted and effectively form the worst-case scenario. They indicate that 20 spaces are required for every 75 dwelling units, or a rate of 0.26 per unit. This would equate to 2 no. childcare spaces (excluding the 1 bedroom units). The development is not of such scale that it would require the construction of a childcare facility. Given the number of creche and Montessori facilities in the area and within a 1.5km catchment of the site, it is anticipated that 2 no. spaces could be accommodated in the future.

As detailed in the Social Infrastructure Audit (Table 5.0), a total of 14 no. childcare facilities are located within 1.5km of the site, providing a range of services from full day to sessional for a range of age profiles with a cumulative capacity for 758 no. children. In addition to existing childcare facilities, there are a number of applications in the pipeline and planned facilities, which are likely to generate an additional 207 childcare spaces in the community, all in proximity to the site. It is noted that there are also several large-scale residential developments in the area currently in the planning process and/or recently permitted, and as part of these development proposals there are childcare facilities proposed therein, that would also be open to the wider residential community in the area.

Design Manual for Quality Housing

This Manual seeks to provide guidance on the design of Social Housing developments in respect of site layouts and the internal layouts of individual dwellings, principally to local authorities and Approved Housing Bodies (AHBs), and their consultants. The sample site layouts included in the Manual set out the urban design and placemaking priorities, consistent with compact growth, to assist in the delivery of high-quality and sustainable housing developments. The Manual seeks to promote a consistent approach nationally by local authorities and AHBs in respect of design priorities and space standards.

The principles of the Design Manual have been incorporated into the proposed development, including the urban structure, permeability, density and diversity in design.

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009. The Guidelines build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

Density

To achieve compact growth, the Guidelines support medium-density housing models, alongside traditional housing and apartment developments, recognising the significant population growth forecast and changing demographics. The guidelines set out a methodology to assist planning authorities in appropriately integrating national planning policy in relation to settlement growth and residential density into statutory development plans and in the assessment of individual planning applications. The policies and objectives are intended as a tool to guide the appropriate scale of development at different locations, rather than as a prescriptive methodology (underline our emphasis).

It is considered that the subject site is located within a City and Metropolitan Area within an area that could be defined as being a 'Suburban / Urban Extension'. It is a policy and objective of the Guidelines that residential densities in the range 40 - 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. The Guidelines clarify that density ranges should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment. However, the Guidelines do clarify that the characteristics detailed are not exhaustive and a local assessment will be required.

With respect to a local assessment it is noted that Sandyford Business District (which includes the Beacon Hospital) is located c. 1.6km to the northeast of the site and the Dundrum Town Centre is c. 2.3km to the north. The site is zoned for Neighbourhood Centre Use and a significant mixed use neighbourhood centre development has been permitted on land across the road to the west. There is significant planning precedence in the area, granting permission for higher density and more compact development as already detailed in Section 2.3 of this report. Of note planning permission was granted on the opposite side of the Sandyford Road for a mixed use development with a net residential density

of c.104 units per hectare. The proposed development of 126.6 units per hectare is in general accordance with the density precedence in the area and which was supported on appeal by An Bord Pleanála.

With respect to accessibility, it is acknowledged that the site is 1.6km from the Glencairn LUAS stop, thus slightly exceeding the maximum distance (1,000 – 1500m) established by the Guidelines. Significantly, the site is located within the Section 49 Luas Line B1 Catchment Area which means it is subject to a Special Development Contribution towards the cost of upgrading the LUAS line, as it is considered that development within the catchment area would benefit from the upgrade. Therefore, the site does and will benefit from future Luas infrastructural upgrades in the area. The two Dublin Bus routes running along Blackglen Road (44B and D114) have servicing in excess of 40 minutes at peak times and thus do not provide the high frequency services required. The current Bus Connects Plan for the area provides for new bus routes in the area but these also will not provide the high frequency services required.

Although the subject site falls just short of being located within the defined accessible distances stated in the Guidelines and which permit higher densities of up to 150uph, it is considered that the site area; its otherwise close distance to Sandyford and Dundrum; the relatively short distance to the bus/Luas; as well as the Neighbourhood centre zoning of the site at the crossroads of an important and newly updated junction; balancing national and county level policy provisions, the characteristics of the immediate receiving environment; and the emerging pattern of development in the local area, the site has the potential of accommodating densities in excess of 40 – 80dph, all in accordance with the objective in the NPF to adopt a *'tailored approach'*.

Qualitative Standards

The Guidelines contain a number of Specific Planning Policy Requirements (SPPR's) which seek to reduce traditional development management standards relating to a minimum quantum of private and public open space, rear garden sizes and car parking. This is done in an effort to afford greater flexibility to development proposals and to facilitate increased densities and compact growth.

In the Guidelines Policy and Objective 5.1 – Public Open Space generally requires the provision of 10 – 15% net public open space provision but does acknowledge that in some circumstances a planning authority might decide to set aside in part or in whole the public open space requirement arising under the development plan. In this regard it is noted that Section 12.8.3 Table 12.8 of the Development Plan acknowledges that high density urban schemes and/or smaller urban infill schemes may provide adequate communal open space but no actual public open space. Notwithstanding this provision, the proposed development provides for 5.7 per cent of public open space in the form of a hard and soft landscaped plaza area. It should also be noted that the development is served with significant communal open space of 410sqm, well in excess of the 279sqm required.

Despite its predominately developed and urban character, there are a range of open space and recreation areas nearby. There are a number of larger key parks, in addition to other open spaces and sport facilities in the vicinity of the site. Whilst, Fitzsimons Park is located closest to the site, offering woodland walkways and recreational trails, there are a number of other larger key parks, in the vicinity including Fernhill House & Gardens; Ballawley Park & Playground (1.3km); and Ticknock Forest.

Of significance, Dún Laoghaire-Rathdown County Council completed a new public park on a former brownfield site along the Drummartin Link Road in 2021. Blackthorn Park, with an area of circa 8 hectares, includes pitch facilities, a playground and walkways, circa 1.5km north east of the site. Another significant open space, accessible by the public, is Ballawley Park, located circa 880m north west of the site on Sandyford Road, containing walkways, a playground and forested areas. The area of the park is significant at circa 8.5 hectares.

Having regard to the neighbourhood zoning afforded to the site, the high density urban nature of the scheme, the restricted site area and proximity of public open space to the site and the extensive communal open space provided to serve the development, it is considered that the limited public open space provided is adequate to serve the proposed development.

The development proposal is therefore considered to be in compliance with the recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 as detailed in Table 3.0.

Policy & Objective No.	Summary	Development Compliance
3.1	The recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level.	The Guidelines specify that residential densities in the range 40dph to 80dph (net) shall generally be applied at Suburban / Urban Extension sites. The proposed net density of 126.6 dwellings per hectare is deemed acceptable having regard to the local assessment undertaken and particularly having regard to the relatively short distance to the bus/Luas; as well as the Neighbourhood centre zoning of the site at the crossroads of an important and newly updated junction; and the emerging pattern of development in the local area,
4.1	The principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 shall be implemented.	The principles of the Design Manual have been incorporated into the proposed development. Compliance with the requirements of DMURS can be found in the report prepared by the project Engineers Malone O'Regan.
5.1	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.	As previously rationalised, the proposed development accommodates 5.7% of public open space. Public open space provision has been reduced having regard to the provisions of the development plan with communal open space in excess of the minimum requirements provided on site.
4.2	The key indicators of quality urban design and placemaking set out in Section 4.4 are to be applied within statutory development plans and in the consideration of individual planning applications.	The Key Indicators of quality and design as detailed in Appendix D of the Guidelines has been considered and are detailed in the Architectural Design Report prepared by MCORM Architects.

SPPR 1	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.	The closest point of the proposed building to a neighbouring house is the three storey element of the northern gable which faces House no. 12 Lambs Brook. This part of the proposed elevation is blank with no windows or balconies and is situated between 14.9 and 15.7m south of No.12. There are no other instances where opposing windows arise with neighbouring units. Internally within the scheme itself the proposed courtyard is well in excess of 16m thereby ensuring no overlooking occurs.
SPPR 2	Minimum private open space standards for houses: 1 bed house 20sqm 2 bed house 30sqm 3 bed house 40sqm 4 bed+ house 50sqm	Not applicable as this is an apartment development which has been designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities
SPPR 3	Car parking should be minimised and substantially reduced and applicants should provide a rationale and justification for the number of car parking spaces proposed.	The proposed car parking on site has been substantially reduced to 0.97 spaces per unit, having regard to the location of the site served by existing and proposed neighbourhood centre uses
SPPR 4	Cycle Parking and Storage to be provided. Minimum cycle parking of 1 space per bedroom to be applied with additional space for visitor parking.	A total of 71 no. bicycle parking spaces have been provided as detailed in Section 5.4 of this report.

Urban Design Manual - A Best Practice Guide (2009)

The core principles of design, including place-making, environmental responsibility, social equity and economic viability, that are required when creating places of high quality and distinct identity are detailed. There are 12 'Best Practice Design Manual' criteria which should be incorporated in new residential development. The 12 criteria are assessed in the Architectural Design Statement prepared by MCORM Architects, demonstrating how they have influenced the overall design approach on the site, including:

- *Context: How does the development respond to its surroundings?*
- *Connections: How well is the new development / site / neighbourhood connected?*
- *Inclusivity: How easily can people use and access the development?*
- *Variety: How does the development promote a good mix of activities?*
- *Efficiency: How does the development make appropriate use of resources, including land?*
- *Distinctiveness: How do the proposals create a sense of place?*
- *Layout: How does the proposal create people-friendly streets and spaces?*
- *Public realm: How safe, secure and enjoyable are the public areas?*
- *Adaptability: How will the buildings cope with change?*
- *Privacy / amenity: How do the buildings provide a high quality amenity?*
- *Parking: How will the parking be secure and attractive?*
- *Detailed design: How well thought through is the building and landscape design?*

Design Manual for Urban Roads and Streets

Section 1.2 of DMURS requires that street layouts be interconnected to encourage walking and cycling and offer easy access to public transport. Notwithstanding the limited area of the site, every effort has been made to facilitate pedestrian and cycling connectivity between the development and Hillcrest Road. Compliance with the requirements of DMURS can be found in the report prepared by the project Engineers Malone O'Regan.

Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities

The Guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland. A key inclusion in the guidelines is the acknowledgement of the importance of development on infill sites in proximity to services and facilities. The Guidelines identify the types of location in cities and towns that may be suitable for apartment development. However, they do clarify that the location will be subject to local determination by the planning authority, having regard to the broad description of proximity and accessibility considerations, detailed in the Guidelines.

Notwithstanding proximity of the site to excellent public transport, the subject site is not a clearly defined 'Intermediate Location' but rather appears to fall with the 'Peripheral/Less Accessible Urban Location' as defined in the Guidelines. As such these locations are "*generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net),*" Section 2.2 of the Guidelines clarify that locations close to centres of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are particularly suited to apartments. Section 2.5 of the goes on to state that "*While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density*".

With regard to inter alia, the pattern of development in the local area, and the location of the subject site on lands zoned neighbourhood centre at a significant road junction, associated with the existing neighbourhood services in the area, it is considered that the subject site is capable of being developed as a neighbourhood and residential centre and that the tenure form of apartments is in this instance acceptable.

With respect to density, whilst the existing context to the site is one of comparatively low residential density, the immediate area is deemed to be one in which the character is rapidly evolving, due particularly to the level of planning activity in recent years, where the emerging profile comprises mid-high density characterised by infill apartment developments, as referenced in Section 2.3 of this report under planning history. It is noted that it is a Policy Objective in the Development Plan (Objective PHP18, to "*increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12*".

Although the subject site, as noted previously in this report falls short of being located within circa 1km pedestrian catchment / 10 minute walking time of a rail station, Luas Line, Core/Quality Bus Corridor and /or 500m/5 minute walking time of a Bus Priority Route, an/or 1km/10 minute walking time of a

Town or District Centre, given the site area, its otherwise close distance to SANDYFORD AND Dundrum, the relative short distance to the bus/Luas, as well as the neighbourhood centre zoning on the site at the crossroads of an important and newly updated junction, balancing national and county level policy provisions, the characteristics of the immediate receiving environment and the emerging pattern of development in the local area, it is considered that the site has the potential of accommodating densities well in excess of 45 units per hectare.

The proposed development provides for an appropriate level of reduced car parking in accordance with the provision of SPPR8 of the Design Standards for New Apartments 2020, which is referred in the Development Plan as providing the relevant guidance on car parking provision. This is described and explained further in the Mobility Management Plan prepared by Malone O'Regan Engineers, supporting the proposed development.

Specific Planning Policy Requirements (SPPRs) are summarised in Table 4.0 and are applied to the development to demonstrate compliance.

Table 4.0 Specific Planning Policy Requirements Apartment Guidelines 2022		
SPPR Number	Summary	Development Compliance
SPPR 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	The proposed mix comprises 78% one bedroom units and 22% two bedroom units. In compliance with SPPR1 the provision of Policy Objective PHP27 in the Development Plan states that for Council own Part 8 or Part 10 schemes, the planning authority shall have regard to the needs of the social housing list of the Council when assessing mix requirements. As detailed in Section 4.0 of this report, of the 3,652 households on the social housing waiting list, the largest demand is for one bed units (2,102 no. one bed units), which accounts for 57.5% of total housing demand in the area.
SPPR 3	<p>Minimum Apartment Floor Areas apply including: 1-bedroom apartment – 45 sqm 2-bedroom apartment - 73 s</p> <p>The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%</p>	<p>The proposed apartments have been designed to exceed minimum floor areas including 1-bedroom apartment – 50.4sqm 2-bedroom apartment – 77.76sqm</p> <p>As per the minimum floor areas in the Guidelines the development must have a minimum floor area of 1,889sqm. Allocating the 10% additional floor area requirement and the proposed floor area of the development would be 2,078sqm. With a gross floor area of 2,083.68sqm the minimum floor area of the apartment units has been exceeded by 10.3%.</p> <p>Please refer to the schedule of accommodation prepared by MCROM Architects.</p>

SPPR 4	Dual Aspect - 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.'	Some 54.05% of units are dual aspect units.
SPPR 5	Floor to ceiling heights - Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use	Floor to ceiling height of ground floor units is 2.7m.
SPPR 6	Apartments per core - A maximum of 12 apartments per floor per core may be provided in apartment schemes.	There are two cores provided within the development serving a maximum of 6 no. apartments each per floor.

There are a number of non-specific policies in the Guidelines with which the proposed development has had regard to. Appendix 1 of the Guidelines contain minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Storage for bulky items outside individual units has been provided at ground floor level. The schedule of accommodation prepared by MCORM Architects details compliance with these standards.

In relation to the provision of communal amenity space for the development, a total of 410sqm has been provided centrally within the development at podium level serve the apartment units, inclusive of a dedicated play area for younger people (217sqm required).

Urban Development and Building Heights- Guidelines for Planning Authorities

Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to build up and consolidate the development of existing urban areas. There is therefore a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good public transport accessibility. There are a number of criteria in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines. It must be demonstrated that the proposed development satisfies these criteria, as detailed in Table 5.0 below.

Table 5.0 Specific Planning Policy Requirements Urban Development & Building Height Guidelines 2018		
Criteria	Requirement	Response
At the scale of the relevant city/town		
	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is located c. 1.6km / 22 min walk / 3 min cycle from the Glencairn Luas Stop, c. 2.3km / 28 min walk from the Kilmacud Luas Stop and c. 2.6km / 31 min walk from the Stillorgan Luas Stop. Significantly, the site is located within the Section 49 Luas Line B1 Catchment Area which means it is subject to a Special Development Contribution towards the cost of upgrading the LUAS line, as it is considered that development within the catchment area would benefit from the upgrade. Therefore the site does and will benefit from future Luas infrastructural upgrades in the area. The site is located on a Proposed Quality Bus Corridor with a bus stop located across the Sandyford Road

	<p>from the subject site (stop no. 3491). The 44B bus route serves the site running from Glencullen to Dundrum Luas Station with the 114 bus route running from Simon’s Ridge to Blackrock DART Station. Both Dundrum LUAS Station & Blackrock DART Station have numerous bus routes to neighbouring districts as well as to Dublin City Centre.</p> <p>Bus network proposals under the BusConnects scheme details how the bus network serving the site will be upgraded with a more frequent and efficient service. The proposed 86 and L33 bus services will provide a direct bus service to Sandyford Business Park and Stillorgan LUAS station from the site. Route No. 86 is a Radial Route linking Ticknock - Goatstown - Mountjoy Square, with a frequency every 30 mins Mon-Sat. Route No. 87 is a Radial Route linking Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route No.88 is a Radial Route linking Enniskerry - Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route L33 is a Local Route linking Glencullen – Dundrum, with a frequency every 60 mins Mon-Fri. It is noted that a Dublin Bus Orbital Route (S8) is proposed along the road adjoining the southern side of the M50. However, this road is segregated and not accessible to pedestrians.</p> <p>The new network will allow for better integration between bus routes and other public transport networks. This will allow residents of the proposed development to be able to change between modes of public transport with ease and be able to access all areas of the city.</p> <p>The capacity of public transport has been assessed by Malone O Regan Engineers within the enclosed Traffic Mobility Management Plan along with the overall strategy to reduce car dependency. This demonstrates there is existing capacity within nearby public transport facilities. The site is located close to the major employment centre of Sandyford Business District to the north east with transport links directly to Dublin City Centre, Dundrum Town Centre and the wider motorway network located nearby. The Drummartin Link Road connects the area to the M50 to the south and Dublin City Centre to the north.</p>
<p>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.</p>	<p>The wider area comprises a broad mix of uses including residential, commercial and education. Whilst the Hillcrest Road is largely dominated by very low density one off housing, the land to the rear (north) of the site is dominated by low density housing developments. Significant road works has been undertaken to the Lamb’s Cross junction and Sandyford Road as part of the Blackglen Road Improvement Scheme. Lambs Cross is dominated by an existing neighbourhood centre comprising a supermarket, pharmacy, veterinary practice and hairdressers. Another part of the crossroad junction has just recently been granted permission for a</p>

	<p>significant mixed use neighbourhood and residential development.</p> <p>MCORM has prepared a design statement setting out the architectural response to the site and how the proposed design is a suitable response to the design context. The layout, orientation and height of the block has been varied in order to respond appropriately to the site while also ensuring a high standard of amenity for residents.</p> <p>Sandyford Road and Hillcrest Road provide a buffer with the surrounding area. Lambs Cross and the Sandyford Road is a broad and busy thoroughfare with wide dimensions, grass verges, footpaths and landscaped areas presenting an opportunity for increased height and density. The building is pulled away from the northern site boundary where it neighbours residential development, whilst the building steps down to three storeys as it extends eastwards along Hillcrest Road.</p> <p>Key public realm and landscape interventions are proposed in order to enhance the development and facilitate integration into the surrounding environment. The proposed development provides for the creation of an attractive, high quality, sustainable development within the existing built-up urban area. The proposal will result in the creation of a strong urban edge at a prominent junction, at a significant intersection on Sandyford Road</p> <p>At 3 - 5 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located / recently permitted in the wider context and as such, it is considered that the height of the proposed development will not be incongruous in the area. Furthermore, the nature, use and scale of the proposed development is considered to be in accordance with national and local policy and good practice guidance, It is therefore considered that the development is consistent with existing and emerging trends for development of existing underutilised, suitably well-located serviced lands.</p> <p>Post construction, the proposed development will increasingly be viewed as part of the baseline environment with a corresponding acceptance of its presence and with an associated reduction of any adverse visual impact.</p>
<p>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.</p>	<p>The subject site is small in area with a gross site area of 0.35 hectares. The potential to incorporate new streets and public spaces is therefore limited. The building addresses the Lambs Cross junction by providing for an area of public realm in front of the proposed community space. The community building is also intended to provide for visual interest in the streetscape.</p>

At the scale of district/ neighbourhood/ street	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</p>	<p>The site is not subject to any beneficial use, having previously been used as a compound for the road improvement works. The site is zoned for mixed use neighbourhood centre facilities zoning. The objective is “to protect, provide for and or improve mixed use neighbourhood centre facilities”. Residential use is permitted in principle and is generally acceptable, subject to compliance with those objectives as set out in other chapters of the Development Plan. Sandyford is identified in Figure 2.9 of the Development Plan as a Mixed-Use District in the Core Strategy. The proposed development will deliver an appropriately scaled level of residential development in this location and will contribute towards the housing target for the overall County over the Development Plan period, while also complementing the existing retail and retail services located on other neighbourhood centre zoned land across the road to the south and that permitted mixed use development located across the road to the west.</p>
<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development provides for variety and interest in the block of development by providing a graduation in height and features to enhance the architectural quality of the building. The proposal provides a strong urban edge and response to the interface with Lambs Cross Junction. The materials and finishes of the proposed blocks will be designed to a high architectural standard. The façade has been animated and articulated by the introduction of balconies which are both extruded and recessed to give depth to the facades.</p>
<p>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)</p>	<p>The scheme is located on a key thoroughfare at an important and busy intersection / junction. Presently the junction arrangement lacks definition and scale. The proposed development provides for the creation of an attractive, high quality, sustainable development within the existing built-up urban area. The proposal will result in the creation of a strong urban edge at a prominent junction, at a significant intersection on Sandyford Road</p> <p>The SSFRA was prepared by Malone O’Regan Engineers in accordance with the recommendations of “The Planning System & Flood Risk Management - Guidelines for Planning Authorities”. The report concludes: “The proposed development is found to be located within Flood Zone C for fluvial, pluvial and coastal flooding and in accordance with The Planning System & Flood Risk Management Guidelines the proposed residential development is deemed appropriate for this flood zone designation”.</p>
<p>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.</p>	<p>At 3 – 5 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context and as such, it is considered that the height of the proposed development will contribute to the legibility of the wider area, particularly given its position at a significant</p>

	<p>nodal point at a significant junction on the Sandyford Road, namely Lamb's Cross.</p>
<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposal supports the '10-minute' neighbourhood concept as the location allows residents to walk or cycle to neighbourhood support facilities within a 10-minute timeframe. In addition to neighbourhood services located across the road from the subject site on neighbouring land to the south, there are a further range of services, employment areas within Sandyford and further access to high quality public transport within a short walk.</p> <p>As set out in the HRA Social Infrastructure Audit, there are a range of services within easy walking distance including significant employment areas within Sandyford Business District, healthcare, retail and ancillary community services. The addition of residential uses on land zoned neighbourhood centre around Lamb's Cross will support the viability of the existing retail and commercial uses on neighboring land. The vision behind the proposed development is to facilitate an overall mixed used neighbourhood centre to complement existing retail and commercial uses already established and permitted under recent planning permissions.</p>
<p>At the scale of the site/building</p>	
<p>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.</p>	<p>Good levels of daylight are achieved in the proposed development as set out in Digital Dimensions Daylight & Sunlight Assessment Report. There is dense tree growth along the southern boundary to No.12 Lamb's Brook which is not included in the assessment of sunlight to the existing windows as recommended in the BRE guidelines, due to the difficulty in accurately representing trees. The effect of the trees would result in lower levels of sunlight availability in the existing condition results and the effective reduction would be less. As noted in the Daylight & Sunlight Analysis report:</p> <ul style="list-style-type: none"> ▪ There is a reduction to available daylight to some of the windows on the gable elevation of a neighbouring house No.12 Lamb's Brook. These windows are secondary to the room and they have other windows on a perpendicular wall. Taking the other windows serving the room into consideration, the area weighted average of the potential impact of these windows is not below 80% of the existing value. As a result any potential loss of light will be minor and minimal and meets the recommendations of the BRE guidelines BR209:2022 (third edition). ▪ One window serving No. 12 Lamb's Cross (window ID 1) has a reduction in winter sunlight hours below the recommended level, however, another window serving the same

	<p>room achieves the target winter sunlight hours and meets the recommendations of the BRE guidelines. The remainder of the windows at ground and first floor level achieve the target APSH and WPSH.</p> <ul style="list-style-type: none"> ▪ All the private amenity space to the surrounding properties will retain 2 hours sunlight over 50% of the area or will not be reduced below 80% of the existing levels. The proposed development meets the recommendations of the BRE guidelines.
<p>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'.</p>	<p>The Daylight & Sunlight Assessment has demonstrated very favourable results with all windows and rooms assessed showing negligible levels of impact. This, as stated previously, is a result of good separation of the proposed scheme from the neighbouring properties.</p>
<p>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.</p>	<p>Not relevant</p>

8.0 REGIONAL POLICY

8.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) sets out a twelve year strategic development framework for development and transcribes the NPF objectives to the regional level. The RSES is a strategic document, which identifies high-level requirements and policies for the Eastern and Midland Region, setting out the high-level statutory framework to empower each local authority to develop County Development Plans (CDPs) and Local Area Plans (LAPs) that are coordinated with regional and national objectives.

The Regional Settlement Hierarchy provides for three distinct areas across the Eastern and Midland Region comprising of the Dublin Metropolitan Area, the Core Region and the Gateway Region. The subject site located within the Dublin Metropolitan Area and the strategy intends to support the continued growth of Dublin as our national economic engine and deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP). The RSES supports 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 in the key metropolitan

towns, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

It is a principle of the RSES to reduce transport demand and encourage low carbon transport modes and promote sustainable transport systems. A guiding principle for the Metropolitan Area is 'Integrated Transport and Land Use'. The RSES focuses growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks. Table 5.1 in the RSES identifies the Luas Greenline as a strategic development area further stating in regard to Sandyford: "Dún Laoghaire – Rathdown – New and emerging mixed-use districts of Cherrywood and Sandyford. New residential communities in Ballyogan and environs and Kiltiernan Glenamuck".

With respect to housing delivery, the RSES promotes the sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, there is a target to achieve 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. The RSES supports a steady supply of sites to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport. RPO 5.5 supports the right housing and tenure mix within the Dublin Metropolitan Area and promotes a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.

The RSES also points out that there is a need to incentivise mobility in the housing market, to address social isolation among older people and to offer more choice by way of an increased supply of accommodation for all life stages. The RSES highlights the importance of housing quality to secure positive health outcomes and that achieving compact growth targets will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential.

RPO 4.3 seeks to *“Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”* It is considered that the proposed development complies with the RSES as it will deliver the appropriate residential, density of 126.6 units per ha having regards to the '2009 Sustainable Residential Development in Urban Areas', '2020 Sustainable Urban Housing - Design Standards for New Apartments' and '2018 Urban Development and Building Heights Guidelines for Planning Authorities'. The proposal site is ideally placed to provide the consolidation of Dublin city and suburbs with adequate supporting infrastructure to support the intensification of this brownfield site.

The proposal seeks to provide for residential development on an underutilised site which seeks to provide appropriate densities, heights in response to both national policy, existing site characteristics and the surrounding context.

Whilst the vision and objectives in the RSES are strategic in context and nature, the wider objectives of the RSES have been complied with by reason of compliance with the national guidelines as detailed above. Further, relevant objectives in the RSES have been translated into local policy via the Dún Laoghaire-Rathdown Development Plan 2023 – 2029 as referenced in Policy Objectives RSES1 which

seeks to ensure consistency with and support the achievement of the Regional Spatial Objectives (RSOs) and Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy.

8.2 Transport Strategy for the Greater Dublin Area 2022-2042

This strategy has been prepared by the National Transport Authority and was adopted in January 2023. The overall aim for the Strategy is to provide sustainable, accessible and effective transport for the Greater Dublin Area (GDA) in response to the region's climate change requirements, need to serve urban and rural communities and support economic growth.

The overall aim of the strategy is: "to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy". The Strategy includes five overarching strategic objectives to achieve the vision which are as follows:

- An Enhanced Natural and Built Environment
- Connected Communities and Better Quality of Life
- A Strong Sustainable Economy
- An Inclusive Transport System

The Strategy sets out key challenges which have informed the Strategy which include climate change, the Covid-19 pandemic, rebalancing road spaces to favour sustainable modes of transport, ensuring access for all and serving more rural communities. Following updated assessment work and taking account of current transport policies, the strategy has identified that 'the Eastern Bypass scheme is no longer required to be developed'. Accordingly, it is not intended to progress this project as part of the Strategy', which is significant in the context of the development proposal.

It is also noted that objective 'Measure LRT7 – Post-2042 Luas Lines' intends to provide for the Green Line Reconfiguration including City Centre to Bray via UCD and Sandyford. Further the Strategy intends to continue improving the bus network following the first tranche of Bus Connects planning applications lodged with An Bord Pleanála and further applications will follow in 2023.

The proposed residential development is located close to an existing Luas station at Glencairn which is along the Luas Greenline. Further the development adjoins an existing Bus Connects route which provides for enhanced and increased bus services, linking the site with other transport modes for connection to the city centre. Whilst the frequency of buses in the immediate vicinity of the site is currently not high, it is anticipated that the delivery and construction of recently permitted developments in the area may create the demand for higher frequency trips in the future. The proposed development is therefore considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

9.0 LOCAL POLICY

It is proposed to evaluate the development against those specific objectives, including objectives relating to housing, supporting infrastructure, zoning, transport & mobility, landscape & biodiversity and water infrastructure as contained in the Dún Laoghaire-Rathdown Development Plan 2023 – 2029

9.1 Housing Supply

The Dún Laoghaire-Rathdown Development Plan 2022 – 2028 (Development Plan) confirms the location of the site in Tier 1 of the Settlement Hierarchy Dublin City & Suburbs. It identifies Sandyford as a Mixed-Use District in the Core Strategy. The Core Strategy of the Development Plan notes the requirement for 18,515 units as a target residential yield for the county over the duration of the new Plan, up to Q1 2028.

The proposed development will deliver an appropriately scaled level of residential development and will contribute towards the housing target for the overall County over the Development Plan period, while also complementing the existing retail and retail services located on other arms of the junction, also zoned for neighbourhood centre use. The proposed development seeks to support the transition to a low carbon and climate resilient agenda facilitating compact growth and increased integration between land-use and transportation. The subject site is serviced and accessible with no major infrastructure required to deliver housing. As such the proposed development can be considered to be entirely in accordance with the Core Strategy and Policy Objective CS2 in the development plan which seeks to support the delivery of the Core Strategy in accordance with the Core Strategy Map and the Core Strategy Table.

9.2 Zoning

The subject site is zoned for neighbourhood centre use. Table 13.1.12 of the Development details the zoning objective for Neighbourhood Centres and seeks *'to protect, provide for and/or improve mixed-use neighbourhood centre facilities'*. In advancing development on the subject site, regard is had to other neighbouring land also zoned for neighbourhood centre use, located at each of the junction intersections. The neighbouring uses already comprise retail, retail services and commercial development on the southern arm of the junction, whilst permission has also been recently granted for a significant mixed use neighbourhood centre and residential development on the western arm.

Existing retail development on the neighbourhood centre zoned land comprises a supermarket and pharmacy. Further, permission has been granted for a supermarket and associated off licence; a restaurant / bar (430 m²) and associated winter garden; 2 No. retail units (a pharmacy of approx. 75 m² and a beauty/hair salon of approx. 33m²); an ATM area; health centre (85m²); and café with 80 no. apartment units (planning reference no. D23A/0456).

Having regard to the existing and permitted retail and commercial uses at Lamb's Cross, it is considered that there is little capacity to accommodate further commercial uses at this time. Accordingly, it is proposed to accommodate a community use on the site to complement existing services in the area.

The proposed development will contribute to the vitality and viability of the existing area by delivering a residential development resulting in a mixed use neighbourhood centre at Lamb's Cross. Existing businesses will be retained, and the new residential community will underpin and support the vitality and viability of the existing services in the area.

9.3 Sustainable Neighbourhood

Policy Objective PHP4 'promotes and facilitates the provision of '10 minute' neighbourhoods whereby people should be able to access most of their daily living requirements within easy reach. A Social Infrastructure Audit prepared by HRA Planning accompanies the proposed development and demonstrates the range of services and facilities within proximity to the site. Providing residential use

within an existing neighbourhood centre zoning, adjoining existing commercial and community facilities reinforces and delivers on the 10 minute neighbourhood concept.

In accordance with Policy Objective PHP6, the proposed development provides for a community facility on site, which shall be managed by the local authority for the benefit of the community.

9.4 Density & Compact Growth

There are a number of policy objectives in the Development Plan promoting higher densities and compact growth, whilst protecting the residential amenities of adjoining neighbourhoods. Policy Objective PHP1 seeks to “*promote compact urban growth through the consolidation and re-intensification of infill / brownfield sites. Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development*”. The Development Plan references the recommendations in the ‘Sustainable Residential Development in Urban Areas’ Guidelines and the accompanying ‘Urban Design Manual’ regarding appropriate densities for various types of locations. These Guidelines have been superseded by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, which have already been evaluated against the proposed development in Table 3.0 of this report. Whilst the Guidelines specify that residential densities of 40 - 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, the local assessment undertaken in Section 7.4 of this report and detailed in Table 3.0 demonstrates why the proposed density of 126.6 units per hectare is deemed acceptable, having regard to the neighbourhood center zoning on the lands, proximity to existing services and facilities, planning precedence and the evolving character of the area undergoing a period of change and the location of the site just outside the accessible location criteria.

Notwithstanding the promotion of higher densities, Policy Objective PHP20 seeks 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*”, whilst Policy Objective PHP42 seeks to “*encourage high quality design of all new development and ensure that new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF)*”. An assessment of the development proposal has been undertaken in accordance with the Urban Development and Building Heights- Guidelines for Planning Authorities (Table 5.0 of this report) and in compliance with the Building Height Strategy for the County (Section 10 of this report). There are no protected views or prospects within the vicinity of the site. At 3 – 5 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of similar and greater height have already been permitted as detailed in Section 2.3 of this report, Planning History. Furthermore, the nature, use and scale of the proposed development is considered to be in accordance with national and local policy and good practice guidance, It is therefore considered that the development is consistent with existing and emerging trends for development of existing underutilised, suitably well-located serviced lands.

Policy Objective PHP44 requires that, all medium to-large scale and complex planning applications (30 + residential units) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.

A comprehensive Architectural Design Statement has been prepared by MCORM which addresses the design criteria.

9.5 Housing Mix

In accordance with Policy Objective PHP27 sustainable residential communities are encouraged by promoting a wide variety of apartment types and sizes. As already detailed in Section 3.2 and 4.0 of this report, there is a need for social housing units in Dún Laoghaire-Rathdown. Section 12.3.3.1 of the Development Plan recognises that for Council own Part 8 or Part 10 schemes, the planning authority shall have regard to the needs of the social housing list of the Council when assessing mix requirements. Accordingly, the development proposal provides for 78% one bedroom units and 22% two bedroom units. As detailed in Section 4.0 of this report, of the 3,652 households on the social housing waiting list, the largest demand is for one bed units (2,102 no. one bed units), which accounts for 57.5% of total housing demand in the area. The provision of 29 no. one bed units in a scheme comprising a total of 37 no. units is intended to accommodate the pressing need for one bed units, whilst providing for diverse and mixed tenure in the immediate surrounding area.

9.6 Open Space and Public Realm

Given the restricted nature of the site limited public open space (5.7%) has been accommodated at the eastern extremity and at the front of the site, with a combination of soft and hard landscaping. However, over double the required quantum of secure, communal open space has been provided. Communal open space of 410sqm is provided in excess of the 217sqm required in accordance with the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023). This area will accommodate a toddler and younger child playground area in accordance with the requirements of the Guidelines and notwithstanding that only 8 no. two bed units are provided.

In addition to this open space provision a comprehensive landscaping scheme has been prepared with extensive groundcover and shrub planting maintained and provided to the east of the building integrating the Brewery Stream into the development. The southern facade presents a more civic character to Hillcrest Road, addressing the proposed community space as this will mark the main point of arrival into the development. This area combines hard landscaping, planting bays and accommodates external cycle parking areas.

As set out in Section 12.8.3.1 of the Development Plan: *“It is acknowledged that in certain instances it may not be possible to provide the above standards of public open space. High density urban schemes and/or smaller urban infill schemes for example may provide adequate communal open space but no actual public open space. Where the required percentage of public open space is not provided the Council will seek a development contribution under Section 48 of the Planning and Development Act 2000, as amended. The contribution in lieu to be paid for any shortfall in the quantum of public open space to be provided will be used for the provision of improved community and civic infrastructure and/or parks and open spaces, in the vicinity of the proposed development for use of the intended occupiers of same.”*

Despite its predominately developed and urban character, there are a range of open space and recreation areas nearby. There are a number of larger key parks, in addition to other open spaces and sport facilities in the vicinity of the site. Whilst, Fitzsimons Park is located closest to the site, offering woodland walkways and recreational trails, there are a number of other larger key parks, in the vicinity including Fernhill House & Gardens; Ballawley Park & Playground (1.3km); and Ticknock Forest. Of

significance, Dún Laoghaire-Rathdown County Council completed a new public park on a former brownfield site along the Drummartin Link Road in 2021. Blackthorn Park, with an area of circa 8 hectares, includes pitch facilities, a playground and walkways, circa 1.5km north east of the site. Another significant open space, accessible by the public, is Ballawley Park, located circa 880m north west of the site on Sandyford Road, containing walkways, a playground and forested areas. The area of the park is significant at circa 8.5 hectares.

In accordance with Policy Objective PHP37 and the requirement for a positive contribution to public realm, the proposed development will deliver a series of public realm and landscape improvements to the area. The overall landscape strategy prepared by Mitchell & Associates and set out in their Landscape Design Statement confirms that the landscape design was developed to create a permeable public realm that connects to all relevant facilities. The public realm surrounds and connects the development, with a dedicated footpath and cycle path along the southern and western edges. At the southern façade, a small civic space is presented to Sandyford Road,.

Having regard to the neighbourhood zoning afforded to the site, the high density urban nature of the scheme, the restricted site area and proximity of public open space to the site and the extensive communal open space provided to serve the development, it is considered that the limited public open space provided is adequate to serve the proposed development.

9.7 Transportation & Mobility

By virtue of the site's location proximate to significant employment areas and high quality/frequency public transport at a suitable density, the proposal supports the achievement of Objective T1 in the Development Plan and the integration of land use zoning with transport. A Traffic & Mobility Management Plan has been prepared by Malone O'Regan Engineers in accordance with the requirements of Policy Objective T17 which requires the submission of Travel Plans on schemes generating significant trip demand. The Traffic & Mobility Management Plan introduces modal share targets which seeks to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development.

Car parking on site is managed as detailed in Section 5.4 of this report and Policy Objective T19. A total of 376no. car parking spaces are provided, equating to a car parking ratio of 0.9 per residential unit. In accordance with the requirement in the Development Plan (Section 12.4.11) to provide 20 per cent of car parking spaces within one fully functional EV Charging points and ducting for every space, a total of 7 no. EV Charging points have been provided. In accordance with Policy Objective T26, a Traffic and Transport Assessment and Road Safety Audit has been undertaken to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.

The Acoustic Design Assessment accompanying the proposed development has considered traffic noise levels as part of the proposed development in accordance with Policy Objective T27. The report recommends mitigation measures I façade treatment to ensure compliance with relevant noise levels.

9.8 Reduced Car Parking

The subject scheme proposes 36 no. car-parking spaces to serve 37 no. one and two bed apartment units and a small community unit. Allocating 1 no. car parking space to the community unit, the proposed car parking ratio is 0.9 per apartment unit. This is below the 'standard' Zone 3 car parking

requirement in the Dun Laoghaire Rathdown Development Plan 2022 – 2028 (Development Plan) which requires 1 car parking space per apartment unit plus 10% for visitor parking.

A reduction in car parking can be considered in certain instances having regard to the provisions of Section 12.4.5.1 in the Development Plan, dependent on the criteria set out in Section 12.4.5.2(i). Having regard to the Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5) of the Development Plan, it is proposed to validate a reduction in car parking having regard to the site, location and context of the development proposal.

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

The site is located c. 1.6km / 22 min walk / 3 min cycle from the Glencairn Luas Stop, c. 2.3km / 28 min walk from the Kilmacud Luas Stop and c. 2.6km / 31 min walk from the Stillorgan Luas Stop. Significantly, the site is located within the Section 49 Luas Line B1 Catchment Area which means it is subject to a Special Development Contribution towards the cost of upgrading the LUAS line, as it is considered that development within the catchment area would benefit from the upgrade. Therefore the site does and will benefit from future Luas infrastructural upgrades in the area.

The site is located on a Proposed Quality Bus Corridor with a bus stop located across the Sandyford Road from the subject site (stop no. 3491). The 44B bus route serves the site running from Glencullen to Dundrum Luas Station with the 114 bus route running from Simon's Ridge to Blackrock DART Station. Both Dundrum LUAS Station & Blackrock DART Station have numerous bus routes to neighbouring districts as well as to Dublin City Centre.

Bus network proposals under the BusConnects scheme details how the bus network serving the site will be upgraded with a more frequent and efficient service. The proposed 86 and L33 bus services will provide a direct bus service to Sandyford Business Park and Stillorgan LUAS station from the site. Route No. 86 is a Radial Route linking Ticknock - Goatstown - Mountjoy Square, with a frequency every 30 mins Mon-Sat. Route No. 87 is a Radial Route linking Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route No.88 is a Radial Route linking Enniskerry - Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route L33 is a Local Route linking Glencullen – Dundrum, with a frequency every 60 mins Mon-Fri. It is noted that a Dublin Bus Orbital Route (S8) is proposed along the road adjoining the southern side of the M50. However, this road is segregated and not accessible to pedestrians.

The new network will allow for better integration between bus routes and other public transport networks. This will allow residents of the proposed development to be able to change between modes of public transport with ease and be able to access all areas of the city.

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

The Development Plan details emerging transportation infrastructure including short (6 years) and long-term road network proposals for the wider area including along the Sandyford Road. The Blackglen Road Improvement Scheme is ongoing and includes proposed improvement works up to the south of Lamb's Brook / Sandyford Road access (phase 1) and improvement works to Sandyford Road to the north of Lamb's Brook, including works along the proposed development site frontage. This included cycle network proposals including a proposed cycle route along the R117 Sandyford Road, adjacent to the proposed development. Hillcrest Road fronting the site was upgraded as part of the Road Improvement Scheme, with a new footpath being provided adjoining the site.

The upgrade works will facilitate a Quality Bus Corridor which will integrate the proposed development with a network of radial and orbital bus routes with established high quality and increased frequency bus and rail routes with connections across Dublin City. The scheme includes new bus stops and cycle lanes along Sandymount Road which will directly enhance the accessibility and connectivity of the subject site, thereby enabling the delivery of residential units in accordance with national planning policy.

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

Significantly 13.6% of households in Dun Laoghaire do not own a car. All other households have access to at least one car. Yet a significant 56.1% travel to work, school, college or childcare either on foot, bicycle or on public transport. This figure is in contrast to the 26.6% national figure and demonstrates a willingness of residents in the Dun Laoghaire area to use a means of transport other than the private car. It further demonstrates that services and facilities are currently reachable by foot, bicycle and public transport within the area.

Chapter 5 in the Development Plan seeks to support the demand management approach which focuses on moving people from the private car to more sustainable modes. There are a number of policy objectives in the chapter which seek to promote modal change and active travel including cycling and walking.

The surrounding area is undergoing a period of transition and densification and a new, emerging population in the area provides an opportunity to safeguard ongoing investment in transport infrastructure in the area. A new population in the area also provides an opportunity to instil modal change from the outset rather than retrospectively trying to convert the existing population.

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

There are a number of e-bike operators in the Dun Laoghaire area including ESB ebikes, Zipp Mobility, and Bolt electric bikes and scooters, providing shared services to the local community.

Similarly there are opportunities to explore partnerships with car sharing operators such as GoCar. A number of recent permissions in the area commit to facilitating car sharing opportunities on site, including a recently permitted development on a neighbouring site to the north at The Pastures. Further there is an existing GoCar base at Glencairn Park n Ride 1.6km / 22 minute walk from the site.

Existing availability of parking and its potential for dual use.

There is no existing parking in the area which could accommodate potential dual use.

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

The subject site comprises a small, 'left-over', infill site, situated at a prominent location on the corner of Sandymount Road and Hillcrest Road. Significantly, the site

- comprises a net developable area of 0.35 hectares,
- is brownfield in nature; and
- is located on neighbourhood centre zoned land.

The location of the site on land zoned for neighbourhood centre use has the potential to create synergies with existing and planned development in the area including a significant proposed mixed use development on land located across the road to the west of the site, which proposes significant retail and community uses.

The range of services available within the area.

The site is well served by existing community infrastructure and amenity spaces and is proximate to key locations in the County, providing employment and services, including:

- 1.4km from Stepside Village
- 1.7km from Beacon Hospital and Beacon South Quarter
- 1.8km from Sandyford Business District
- 2.8km from Dundrum Town Centre

A Social Infrastructure Audit has been prepared in support of the development proposal, confirming the existing community infrastructure and amenity spaces available within a 1.5km radius of the site. The report has demonstrated that the subject site is located in proximity to a range of facilities that will benefit the future residents of the proposed scheme. The proposed development will generate an exceptionally small added demand on the existing services and facilities, including open space and leisure facilities.

There are a number of primary schools and secondary schools within 1.5km of the site, which can accommodate the low demand arising from the proposed development. This number is too low to justify the provision of new schools. The development is projected to only result in a demand for 2 no. childcare spaces and having regard to the number of facilities in the area, it is considered that such demand can be accommodated.

The subject site is well served by healthcare facilities within a short distance from the site. In addition, there are an extensive range of GP clinics and pharmacies located in the area which will serve the needs of future residents at the subject site.

There are several places of worship in the area covering a wide range of different Christian denominations and there is a range of community facilities, including one such facility adjoining the site. Local needs are adequately addressed with the provision of retail services on the neighbouring site at Lamb's Cross, with other significant supermarkets located within a 1.5km radius of the site.

Impact on traffic safety and the amenities of the area and capacity of the surrounding road network.

From a road's perspective, the site has excellent access to the national road network, situated just west of the Kilgobbin Road which connects to the M50 at Junction 14 to the north east. The development comprises only 37 no. one and two bed units and it is anticipated that traffic generation from the development will be low, thereby having negligible impact on the surrounding road network. The development will be subject to a Road Safety Audit, thereby ensuring no adverse impacts from a traffic safety perspective.

Urban design, regeneration and civic benefits including street vibrancy

The proposed development on a prominent corner, zoned for neighbourhood centre use, has the potential to define the built form, providing legibility and facilitating street vibrancy. Creating a streetscape to Hillcrest Road which wraps around onto the Sandyford Road has been a key objective of the overall design approach, which has resulted in the provision of car parking at undercroft level,

away from public view. Adopting this approach, means that there is no further capacity to accommodate car parking on site. Additional car parking can only be accommodated on site by removing part of the proposed streetscape (frontage) and replacing with car parking, which is not an acceptable urban design solution.

Robustness of Mobility Management Plan to support the development.

A comprehensive Mobility Management Plan has been prepared in support of the development proposal, with specific mobility targets, which will evolve and be reviewed over time.

9.9 Development Management Standards

Whilst the previous paragraphs evaluate the proposed development against a number of objectives in the Development Plan, there is also a need to consider a number of relevant development management standards provided in Chapter 12 of the Plan. The relevant standards have been extracted from the Development Plan as detailed in Table 6.0 and an evaluation of the development proposal provided.

Table 6.0 Development Management Standards Dún Laoghaire-Rathdown Development Plan 2022 – 2028	
Development Plan Standards	Development Evaluation
Section 12.1.1.2 - A Design Statement which is an outline of the proposal's context and aims, and how it responds to Development Plan objectives and surroundings, should be submitted for all applications of 1000+sq.m. commercial development or applications of 30+ residential units.	MCORM has prepared a design statement setting out the architectural response to the site and how the proposed design is a suitable response to the design context.
Section 12.1.1.3 - Planning applications for 1000+sq.m. commercial development, 10+ residential units, or smaller developments (as deemed appropriate by the Planning Department), should submit a landscape design rationale prepared by a qualified Landscape	A Landscape Design Statement has been prepared by Mitchell & Associates and is enclosed with the documentation.
Section 12.1.2.1 - All Planning applications undergo EIAR screening or preliminary assessment.	An EIA Screening Report has been prepared by HRA Planning and accompanies the development proposal, as detailed in Section 6.6 of this report.
Section 12.1.2.2 – Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to Plans and Projects, Appropriate Assessment (AA) is required..	An AA Screening has been prepared by NM Ecology and accompanies the development proposal as detailed in Section 6.5 of this report.
Section 12.1.2.3 – An Ecological Impact Assessment may be required to be submitted with any proposed development should the Planning Authority consider that there is potential to impact upon an environmentally sensitive area such as a wildlife corridor, a site adjoining or adjacent to a proposed National Heritage Area, along the coastline or a river. The requirement for an ecological impact assessment will be determined.	An Ecological Assessment has been prepared by NM Ecology and accompanies the development proposal as detailed in Section 6.2 of this report

<p>Section 12.2.1 - An Energy Statement should be included for all applications of 1000+ sq.m. commercial development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered</p>	<p>A Climate Action, Sustainability & Part L Compliance Report has been prepared by Semple McKillop Consulting Engineers as detailed in Section 6.1 of this report.</p>
<p>Section 12.3.3 - Housing Mix and compliance with Policy Objective PHP 20.</p>	<p>Table 1.0 in this report provides details on housing mix and this is further supplemented with information in the Architectural Design Statement. The rationale supporting the housing mix proposed is detailed in Section 9.5 of this report and is based on the Social Housing Need of the Council.</p>
<p>Section 12.3.3.2 - In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document: - 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' (2009). - Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020). As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport.</p>	<p>As detailed in Section 9.4 of this report, the Guidelines referenced have been superseded by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, which have already been evaluated against the proposed development in Table 3.0 of this report.</p>
<p>Section 12.3.4.2 – The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission. A daylight analysis will be required for all proposed developments of 50+ units,</p>	<p>The 37 no. apartment units have been designed in full compliance with the Apartment Guidelines as detailed in the Architectural Design Statement, Appendix A Housing Quality Assessment. A Daylight & Sunlight Analysis has been undertaken in respect of the development proposal as detailed in Section 6.9 of this report.</p>
<p>Section 12.3.4.4 - No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements are available to support development.</p>	<p>The development comprises 37no. units only. Notwithstanding, an Engineering Planning Report and Traffic Assessment prepared by Malone O'Regan accompanies the development proposal along with a Social Infrastructure Audit prepared by HRA Planning.</p>
<p>Section 12.3.4.7 - Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for.</p>	<p>Refuse, recycling and composting facilities are provided at ground floor level easily accessible at podium level or internally within the development by occupiers of the units.</p>
<p>Section 12.3.5.1 – 50% dual aspect requirement for apartments in a single scheme</p>	<p>54% of the proposed apartments are dual aspect. The proposed development provides a high standard of amenity as part of the development including private and communal amenity space as well as internal unit sizes.</p>

<p>Section 12.3.5.2 - All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed.</p>	<p>The closest point of the proposed building to a neighbouring house is the three storey element of the northern gable which faces House no. 12 Lambs Brook. This part of the elevation is blank with no windows or balconies and is situated between 14.9 and 15.7m south of No.12. There are no other instances where opposing windows arise with neighbouring units.</p>
<p>Section 12.3.5.3 – Minimum internal storage provisions are required per apartment size. Apartment schemes should provide external storage for bulky items outside individual units (i.e., at ground or basement level), in addition to the minimum apartment storage requirements.</p>	<p>Internal storage generally comply with the minimum thresholds with 1 bed units comprising 3sqm of storage and 2 bed units of 6sqm. Some 38.8sqm of bulk storage space has been provided at ground floor level for use by apartment owners / occupiers.</p>
<p>Section 12.3.5.5 – Minimum apartment floor areas as per the Guidelines.</p>	<p>The proposed apartments have been designed to exceed minimum floor areas including 1-bedroom apartment – 50.4sqm 2-bedroom apartment – 77.76sqm</p> <p>As per the minimum floor areas in the Guidelines the development must have a minimum floor area of 1,889sqm. Allocating the 10% additional floor area requirement and the proposed floor area of the development would be 2,078sqm. With a gross floor area of 2,083.68sqm the minimum floor area of the apartment units has been exceeded by 10.3%.</p> <p>Please refer to the schedule of accommodation prepared by MCROM Architects.</p>
<p>Section 12.4.1 - 12.4.3– Traffic Management and Road Safety</p>	<p>The proposed development provides a new access off Hillcrest Road. A Traffic & Mobility Management Plan has been prepared by Malone O'Regan Engineers to include a Mobility Plan which seeks to enhance modal split on the site away from use of the car.</p>
<p>Section 12.4.5 – Car Parking. Where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority having regard to a number of criteria.</p>	<p>Section 9.8 of this report considers a reduction in car parking having regard to the provisions of Section 12.4.5.1 in the Development Plan, dependent on the criteria set out in Section 12.4.5.2(i).</p>

<p>Section 12.4.6 – Cycle Parking</p>	<p>A total of 71 no. bicycle parking spaces have been provided with 49 no. secure spaces provided at ground floor level within the building on the western façade. A total of 20 no. visitor spaces are provided at surface level, in accordance with SPRR 4 - Cycle and Storage, Sustainable Residential Development and Compact Settlements Guidelines for Local Authorities 2024 and in excess of the standards provided in the Development Plan, 'Standards for Cycling Parking & Associated Cycling Facilities for new Developments' 2018. Each bedspace has been provided with one long stay bicycle space and the community space has been provided with 20 no. spaces, that is 1 space per 5 no. employees. These spaces can also be used by short stay visitors to the apartment units.</p>
<p>Section 12.8.1 – Planning applications for both residential (10+ units or as required by the Planning Authority) and commercial (1,000 sq.m. or as required by the Planning Authority), including leisure and recreational facilities, should submit a landscape design rationale prepared by a qualified Landscape Architect.</p>	<p>Mitchell & Associates has prepared a Landscape Design Report which is submitted with the development proposal.</p>
<p>Section 12.8.3.1 – 12.8.3.3 – Public, private and communal open space provision.</p>	<p>Section 9.6 of this report rationalises the provision of public and communal open space, whilst the HQA detailed in the Architectural Design Statement demonstrates how private open space in the form of balconies, is provide in accordance with the requirements of the Apartment Guidelines.</p>
<p>Section 12.8.6 Surface water requirement, biodiversity and required SUDs measures</p>	<p>A comprehensive SUDs strategy has been prepared for the site, with an emphasis on nature based solutions through the provision of bio retention swales, tree pits, green roofs, blue roofs and permeable paving.</p>
<p>Section 12.8.7.2 - Suitable boundary treatments both around the side and between proposed dwellings shall be provided.</p>	<p>Details of site boundary treatment are included within the Landscape Design Statement and associated drawings.</p>
<p>Section 12.9.2 - The Planning Authority will have regard to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023', when assessing planning applications along major road and rail transport corridors – the objective being to reduce noise from new sources and to identify and protect and create areas of low sound levels.</p>	<p>As detailed in Section 6.7 of this report an Acoustic Design Statement has been prepared in support of the development proposal.</p>

<p>Section 12.9.4 - Construction Management Plans (CMP) for developments generating construction activity— containing measures to mitigate against the effects of the construction— shall accompany planning applications for development of 3 residential units or more and for all other developments measuring more than 500 sq.m. gross floor area.</p>	<p>An Outline CEMP has been prepared by OCS and is enclosed with this application.</p>
<p>Section 12.9.6 - Applications for developments with a site area measuring 0.5ha, or greater and above 50+residential units shall include a Stormwater Audit.</p>	<p>A Stormwater Audit has been carried out and is enclosed within the Engineering Planning Report.</p>

10.0 HEIGHT ASSESSMENT AS PER DEVELOPMENT PLAN

Table 5.1 Appendix 5 of the Dun Laoghaire Rathdown County Council Development Plan 2022 - 2028 details a number of criteria for assessing height. Notwithstanding the assessment undertaken in Table 5.0 of this report, in respect of the Building Height Guidelines, an analysis of the development proposal as detailed in Table 6.0, further demonstrates compliance with the provisions of the Dún Laoghaire-Rathdown Development Plan 2022 – 2028

Table 6.0 Criteria for Assessing Height as per Dún Laoghaire-Rathdown Development Plan 2022 – 2028

Criteria for all such Proposals	Proposal Response
At County Level	
<p>Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.</p>	<p>This report confirms the proposed development addresses the key objectives of the NPF and National Policy for residential development</p>
<p>Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport.*</p>	<p>The site is located c. 1.6km / 22 min walk / 3 min cycle from the Glencairn Luas Stop, c. 2.3km / 28 min walk from the Kilmacud Luas Stop and c. 2.6km / 31 min walk from the Stillorgan Luas Stop. Significantly, the site is located within the Section 49 Luas Line B1 Catchment Area which means it is subject to a Special Development Contribution towards the cost of upgrading the LUAS line, as it is considered that development within the catchment area would benefit from the upgrade. Therefore the site does and will benefit from future Luas infrastructural upgrades in the area.</p> <p>The site is located on a Proposed Quality Bus Corridor with a bus stop located across the Sandyford Road from the subject site (stop no. 3491). The 44B bus route serves the site running from Glencullen to Dundrum Luas Station with the 114 bus route running from Simon’s Ridge to Blackrock DART</p>

	<p>Station. Both Dundrum LUAS Station & Blackrock DART Station have numerous bus routes to neighbouring districts as well as to Dublin City Centre.</p> <p>Bus network proposals under the BusConnects scheme details how the bus network serving the site will be upgraded with a more frequent and efficient service. The proposed 86 and L33 bus services will provide a direct bus service to Sandyford Business Park and Stillorgan LUAS station from the site. Route No. 86 is a Radial Route linking Ticknock - Goatstown - Mountjoy Square, with a frequency every 30 mins Mon-Sat. Route No. 87 is a Radial Route linking Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route No.88 is a Radial Route linking Enniskerry - Belarmine - Dundrum - Mountjoy Square, with a frequency every 60 mins Mon-Sat. Route L33 is a Local Route linking Glencullen – Dundrum, with a frequency every 60 mins Mon-Fri. It is noted that a Dublin Bus Orbital Route (S8) is proposed along the road adjoining the southern side of the M50. However, this road is segregated and not accessible to pedestrians.</p> <p>The new network will allow for better integration between bus routes and other public transport networks. This will allow residents of the proposed development to be able to change between modes of public transport with ease and be able to access all areas of the city.</p> <p>The capacity of public transport has been assessed by Malone O Regan Engineers within the enclosed Traffic Mobility Management Plan along with the overall strategy to reduce car dependency. This demonstrates there is existing capacity within nearby public transport facilities. The site is located close to the major employment centre of Sandyford Business District to the north east with transport links directly to Dublin City Centre, Dundrum Town Centre and the wider motorway network located nearby. The Drummartin Link Road connects the area to the M50 to the south and Dublin City Centre to the north.</p>
<p>Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</p>	<p>MCORM has prepared a design statement setting out the architectural response to the site and how the proposed design is a suitable response to the design context. The layout, orientation and height of the block has been varied in order to respond appropriately to the site while also ensuring a high standard of amenity for residents.</p>

	<p>The proposed development encloses a key intersection (crossroads) on the Sandyford Road to the benefit of the legibility, appearance and character of the area.</p> <p>The scheme is located on a key thoroughfare at an important and busy intersection / junction. Presently the junction arrangement lacks definition and scale. The proposed development provides for the creation of an attractive, high quality, sustainable development within the existing built-up urban area. The proposal will result in the creation of a strong urban edge at a prominent junction, at a significant intersection on Sandyford Road</p>
<p>Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.</p>	<p>At 3 – 5 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context and as such, it is considered that the height of the proposed development will contribute to the legibility of the wider area, particularly given its position at a significant nodal point at a significant junction on the Sandyford Road, namely Lamb’s Cross.</p>
<p>Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</p>	<p>There are no capacity constraints affecting the development proposal. A Social Infrastructure Audit has been undertaken in respect of the development proposal to assess existing services and facilities whilst a Services and Transport Infrastructure Report has been prepared by Malone O’Regan Engineers</p>
<p>At District/Neighbourhood/Street Level</p>	
<p>Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The Design Statement prepared by MCORM Architects sets out in detail how the proposed development complies with the 12 criteria as set out in “Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities” 2009 and the key indicators of quality urban design and placemaking set out in the new Compact Growth Guidelines.</p>
<p>Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</p>	<p>The Design Statement prepared by MCORM Architects articulates the design approach to massing, scale and materials. The proposed development provides for variety and interest in the block of development by providing a graduation in height and features to enhance the architectural quality of the building. The proposal provides a strong urban edge and</p>

	<p>response to the interface with the crossroads junction. The materials and finishes of the proposed blocks will be designed to a high architectural standard. The façade has been animated and articulated by the introduction of balconies which are both extruded and recessed to give depth to the facades.</p>
<p>Proposal must show use of high quality, well considered materials.</p>	<p>A detailed Building Life Cycle Report by MCORM Architects is submitted with the application.</p>
<p>Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</p>	<p>The planning application is accompanied by a Site Specific Flood Risk Assessment (SSFRA) report and Storm Water Audit. In terms of Urban Design, the proposed scheme is set back from the Sandyford Road junction with public realm fronting the road whilst the building contributes to the legibility of a key intersection with the Hillcrest Road.</p>
<p>Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.</p>	<p>At 3 – 5 storeys, the proposed development is notably higher than its immediate traditional suburban context. However, buildings of a similar and greater height are already located in the wider context and as such, it is considered that the height of the proposed development will contribute to the legibility of the wider area, particularly given its position at a significant nodal point at a significant junction on the Sandyford Road, namely Lamb”s Cross.</p> <p>A community facility is provided at ground floor level addressing Sandyford Road, providing for visual interest in the streetscape.</p>
<p>Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.</p>	<p>Section 3.0 & 40 of this report details how the development contributes to the dwelling mix and tenure in the area, whilst Section 9.1.2 details the positive contribution to the mix of uses in the existing Neighbourhood Centre.</p> <p>The proposal supports the ‘10-minute’ neighbourhood concept as the location allows residents to walk or cycle to neighbourhood support facilities within a 10-minute timeframe. In addition to neighbourhood services at the neighbouring site to the south there are a further range of services, employment areas within Sandyford and further access to high quality public transport within a short walk.</p>

<p>Proposal should provide an appropriate level of enclosure of streets or spaces.</p>	<p>The subject site is small in area with a gross site area of 0.37 hectares. The potential to incorporate new streets and public spaces is therefore limited.</p>
<p>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>	<p>MCORM has prepared a design statement setting out the architectural response to the site and how the proposed design is a suitable response to the design context. The layout, orientation and height of the block has been varied in order to respond appropriately to the site while also ensuring a high standard of amenity for residents.</p>
<p>Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>	<p>The site is not subject to any beneficial use, save for its previous use as a compound enabling road works in the area. The site is zoned for mixed use neighbourhood centre facilities zoning. The objective is “<i>to protect, provide for and or improve mixed use neighbourhood centre facilities</i>”. Residential use is permitted in principle and is generally acceptable, subject to compliance with those objectives as set out in other chapters of the Development Plan. Sandyford is identified in Figure 2.9 of the Development Plan as a Mixed-Use District in the Core Strategy. The proposed development will deliver an appropriately scaled level of residential development in this location and will contribute towards the housing target for the overall County over the Development Plan period, while also complementing the existing retail and retail services located on the subject site, which will provide a mixed-use location, commensurate with the NC zoning of the subject site.</p>
<p>Proposal must respect the form of buildings and landscape around the site’s edges and the amenity enjoyed by neighbouring properties.</p>	<p>Sandyford Road and Hillcrest Road provide a buffer with the surrounding area. Lambs Cross and the Sandyford Road is a broad and busy thoroughfare with wide dimensions, grass verges, footpaths and landscaped areas presenting an opportunity for increased height and density. The building is pulled away from the northern site boundary where it neighbours residential development, whilst the building steps down to three storeys as it extends eastwards along Hillcrest Road.</p>

At Site / Building Scale	
<p>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing</p>	<p>Good levels of daylight are achieved in the proposed development as set out in Digital Dimensions Daylight & Sunlight Assessment Report. There is dense tree growth along the southern boundary to No.12 Lamb's Brook which is not included in the assessment of sunlight to the existing windows as recommended in the BRE guidelines, due to the difficulty in accurately representing trees. The effect of the trees would result in lower levels of sunlight availability in the existing condition results and the effective reduction would be less. As noted in the Daylight & Sunlight Analysis report:</p> <ul style="list-style-type: none"> ▪ There is a reduction to available daylight to some of the windows on the gable elevation of a neighbouring house No.12 Lamb's Brook. These windows are secondary to the room and they have other windows on a perpendicular wall. Taking the other windows serving the room into consideration, the area weighted average of the potential impact of these windows is not below 80% of the existing value. As a result any potential loss of light will be minor and minimal and meets the recommendations of the BRE guidelines BR209:2022 (third edition). ▪ One window serving No. 12 Lamb's Cross (window ID 1) has a reduction in winter sunlight hours below the recommended level, however, another window serving the same room achieves the target winter sunlight hours and meets the recommendations of the BRE guidelines. The remainder of the windows at ground and first floor level achieve the target APSH and WPSH. ▪ All the private amenity space to the surrounding properties will retain 2 hours sunlight over 50% of the area or will not be reduced below 80% of the existing levels. The proposed development meets the recommendations of the BRE guidelines.
<p>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met</p>	<p>The Daylight & Sunlight Assessment has demonstrated very favourable results with all windows and rooms assessed showing negligible levels of impact. This, as stated previously, is a result of good separation of the proposed scheme from the neighbouring properties.</p>

<p>Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.</p>	<p>Sandyford Road and Hillcrest Road provide a buffer with the surrounding area. Lambs Cross and the Sandyford Road is a broad and busy thoroughfare with wide dimensions, grass verges, footpaths and landscaped areas presenting an opportunity for increased height and density. The building is pulled away from the northern site boundary where it neighbours residential development, whilst the building steps down to three storeys as it extends eastwards along Hillcrest Road. Retention of existing trees along the northern boundary prevents direct overlooking along with a separation distance of between 14.9 – 15.7m from the closest house No. 12 Lambs Brook. The Sunlight & Daylight assessment confirms that all areas assessed generally continue to meet or exceed the recommendations of the BRE guidelines (2022). One window serving No. 12 Lamb's Cross (window ID 1) has a reduction in winter sunlight hours below the recommended level, however, another window serving the same room achieves the target winter sunlight hours and meets the recommendations of the BRE guidelines. The remainder of the windows at ground and first floor level achieve the target APSH and WPSH.</p>
<p>Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</p>	<p>Not relevant as there are no protected structures or ACA's within the vicinity of the site.</p>
<p>Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development.</p>	<p>A Climate Action, Sustainability & Part L Compliance Report has been prepared by Semple McKillop Consulting Engineers demonstrating maximum energy efficiency to align with climate policy as detailed in Section 6.1 of this report.</p>
<p>Having regard to the County's outstanding architectural heritage, which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.</p>	<p>Not applicable to Sandyford area.</p>
<p>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.</p>	<p>Not applicable to Sandyford area.</p>

Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage).	Detailed consultation with the planning authority identified no additional issues.
Specific assessments such as assessment of microclimatic impacts such as down draft.	At 3 -5 storeys in height, impacts such as down draft are not considered relevant.
Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas	Not applicable in this location. An Ecological Impact Assessment accompanies the application.
Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.	Not applicable as building is maximum 5 storeys.
An assessment that the proposal maintains safe air navigation	Not applicable in this location
Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.	This application is accompanied by an EIAR Screening and AA Screening Report as detailed in Sections 6.5 & 6.6 of this report.
Additional criteria for larger redevelopment sites with taller buildings	Subject site is not considered a 'larger development site'.
Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing & height to achieve densities but with variety scale and form to respond scale of adjoining development	The Design Statement prepared by MCORM Architects and Landscape Masterplan prepared by Mitchells confirm positive contribution to place making of the proposed development.
For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/ any forthcoming EU standards on daylight sunlight should be met.	Addressed in detailed Daylight and Sunlight Analysis Report by Digital Dimensions. Refer to Section 6.9 of this report.

11.0 CONCLUSION

The proposed development has had regard to the provisions of the Dún Laoghaire-Rathdown Development Plan 2023 – 2029 (KDP), which seeks to address many issues associated with housing in the county, including housing need, improving social mix and catering for those with particular needs. The development also complies with the zoning objectives for the land as set out in the Development Plan providing for a residential development adjoining an established neighbourhood centre.

The proposed development accommodates a suitable mix of housing, separation distance and car parking together with the quantitative requirements for private and communal open space, all in accordance with the provisions of the statutory Development Plan. The overall building form and layout responds to its site and context, whilst facilitating higher density and compact growth all in accordance with the provisions of the Development Plan. Further the density proposed is appropriate for the site having regard to the pattern of both permitted and adjoining development and the provisions of the Core Strategy table in the Dún Laoghaire-Rathdown Development Plan 2023 – 2029.

There is adequate service infrastructure in the area to accommodate the development proposal including water and transport infrastructure. The proposed development seeks to address and meet

some of the critical need for housing within the area, providing much needed accommodation for those on the Housing Waiting List.

The proposed development is consistent with the provisions of the Dún Laoghaire-Rathdown Development Plan 2023 – 2029 and national guidelines, all in accordance with the proper planning and sustainable development of the area.