



ARMSTRONG FENTON

ASSOCIATES

PROJECT:

**Proposed Large Scale Residential development at Boherboy,
Saggart, Co. Dublin**

APPLICANTS:

Kelland Homes Ltd & Evara Developments Ltd

REPORT:

Statement of Consistency

DATE:

December 2025.

**Planning &
Development
Consultants**



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1.0. Introduction

Purpose of Report

- 1.1. This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning & Development Consultants of 13 The Seapoint Building, 44/45 Clontarf Road, Clontarf, Dublin 3, D03 A0H3, on behalf of Kelland Homes Ltd. and Evara Developments Ltd (the Applicants) to accompany a planning application for a Large-scale residential Development, in respect of a site measuring c. 18.7 hectares located at Boherboy, Saggart, Co. Dublin (the subject site).
- 1.2. Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 (hereafter "Act of 2021") defines "LRD" as a large-scale residential development, which means a development that includes, *inter alia*:

(a) *the development of 100 or more houses.*
- 1.3. Our clients (the Applicants) wish to apply for permission for a LRD on the subject site, and this Statement of Consistency (hereafter 'statement') sets out how the proposed LRD has had regard to the relevant objectives of the development plan or local area plan in whose area or areas the proposed LRD would be situated which is a requirements of Planning and Development (Large-scale Residential Development) Regulations 2021. This is put forward to demonstrate that the proposed development is consistent with the relevant national, regional, and local planning policy.
- 1.4. This application for a LRD is also accompanied by a comprehensive range of documentation, including for, *inter alia*: Planning Statement, Social Infrastructure Assessment, Environmental Impact Assessment Report (EIAR) etc. These documents are enclosed as part of this LRD planning application as separate standalone documents and should be read in conjunction with this statement, together with the drawings and technical reports listed in the cover letter which accompanies the request.

Structure of Report

- 1.5. The remainder of this Statement is structured as follows:
 - **Section 2** provides an overview of the proposed development,
 - **Section 3** details the proposed development's consistency with national planning policy,
 - **Section 4** details the proposed development's consistency with Section 28 Ministerial Guidelines and other national guidance documents,
 - **Section 5** details the proposed development's consistency with regional planning policy,
 - **Section 6** details the proposed development's consistency with local planning policy,
 - **Section 7** provides for overall conclusions to this Statement.

2.0. Proposed Development Overview

Site Context

- 2.1** The site is located approx. 2km south-west of Tallaght town centre, approx.1.3km east of Saggart, approx. 700m south-west of Citywest Shopping Centre and 1.6km south of the N7. The site is a greenfield, outer suburban site. To the immediate north of the site is the Carrigmore residential estate, to the west are agricultural lands and a single dwelling, to the east is the Corbally / Verschoyle residential estate while to the south is the Boherboy Road. Refer to Figure 1 below for the site location.



Figure 1: Annotated Aerial Map

Site Description

- 2.2** The site is a greenfield site, having only ever been used for agricultural purposes. The site is steeply sloping, from south to north, with site levels ranging from 155mOD in the south-west corner to 117.5mOD in the north-west corner, which is a level difference of c. 37 metres across the entire site.
- 2.3** The Corbally Stream runs along the entire length of the eastern boundary of the site, turning west at the north-eastern corner of the site and flows along the northern boundary westwards where two streams within the site, the Cooldown and the Coldwater, flow into the Corbally. The Corbally then merges into the Camac River c. 2.5km away. A 10m riparian metre buffer setback from the top of the stream bank along the Corbally stream is provided for along the entire length as part of the proposed development, which will be maintained during the construction and operational phase of the proposed development, with the exception of the four no. stream crossings. Likewise on the western boundary, a 10m buffer is also proposed along the entire length of the site. The riparian buffer of the Cooldown stream (i.e. the central watercourse in the site) will be reduced in width limited to areas outside of the flood zones. There are various utilities traversing the site which includes water network pipes, and underground and over-ground electricity transmission lines.
- 2.4** Typical of a site such as this, the two fields comprising the site are divided from one another by a typical agricultural type hedgerow with similar type hedges extending around the perimeter of both fields. The hedgerows have been planted on hedgerow banks on the side of open wet drainage ditches which help to drain these lands. The hedgerows are predominantly Hawthorn, Blackthorn and Elder with some pockets of Holly, Privet and Hazel with a dense undergrowth of Bramble and Dogrose. Trees within this site area are growing out of the aforementioned hedgerows and mainly consist of Ash with some Sycamore and Beech. These range in age from young seedlings to mature trees that protrude above the hedge lines.
- 2.5** The subject site includes the aforementioned two fields, as well as an additional parcel of land in the south-east corner that abuts Corbally and is separated from the two main fields by the Corbally Stream. Kelland Homes lands have been zoned for residential land use since the adoption of 1998 South Dublin County Development Plan, with the adjoining Durkan Estates Ireland lands, zoned for residential lands use since the adoption of the 2004 South Dublin County Development Plan.

Planning Context

- 2.6** The entirety of the subject site is currently zoned objective "Res-N": *"To provide for new residential communities in accordance with approved area plans"* in the existing South Dublin County Development Plan 2022-2028 (hereafter "CDP"). The current proposal for the development of 611 no. residential dwellings and a childcare facility on the subject site is therefore considered appropriate and in compliance with the land-use zoning objective attached to the site.
- 2.7** It is noted that there is an objective for a school on the site (identified by "S" on Map no. 8 of the Development Plan land use zoning map).
- 2.8** There is also a medium to long term roads objective (i.e. six year Roads Objectives) travelling north-south through the middle of the site, and then east-west from the north-south route and connecting with Corbally Heath to the east.

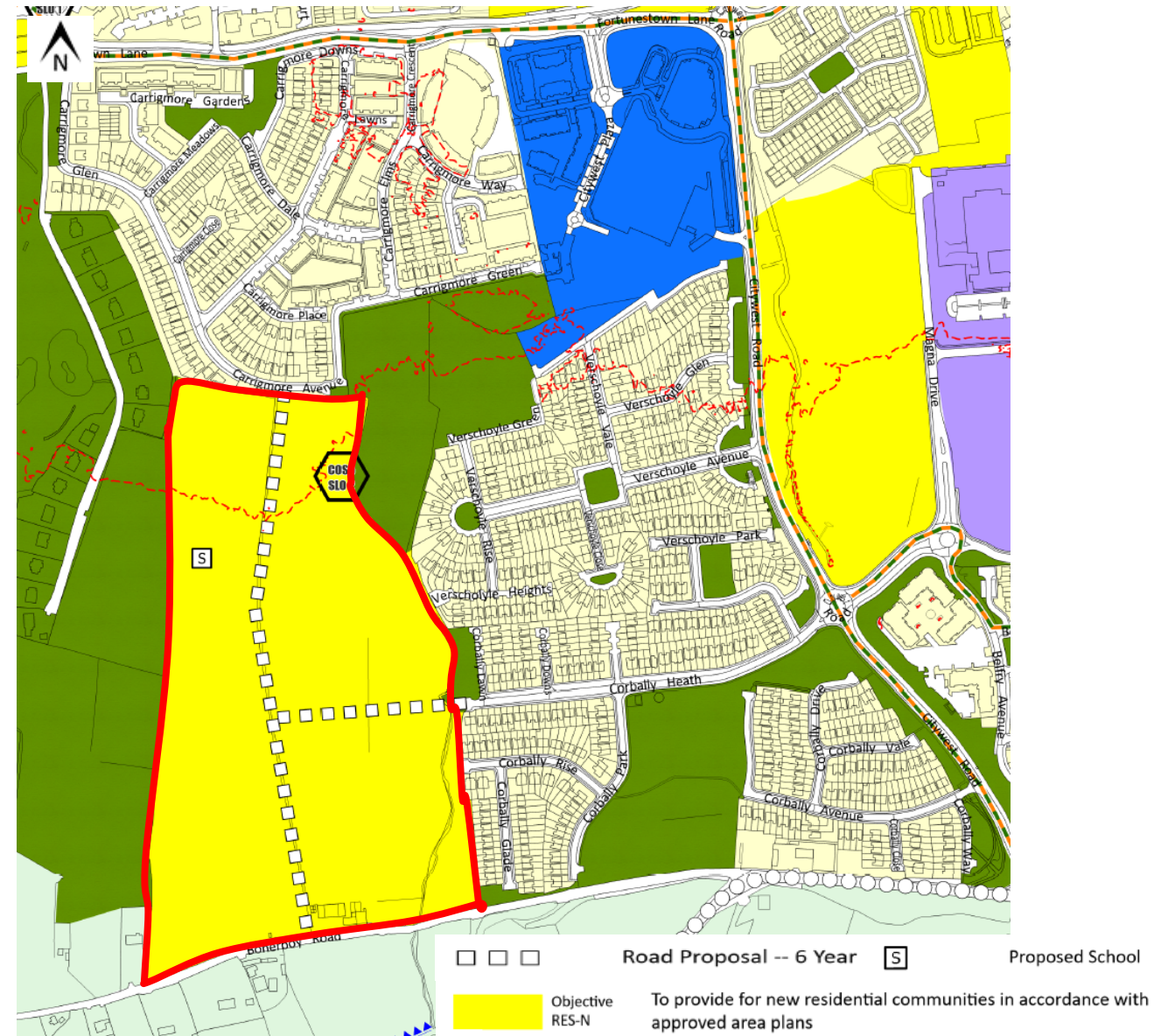


Figure 2: Extract from South Dublin County Development Plan, 2022-2028 (Map No. 8), with subject site indicatively outlined in red.

2.9 Finally, there is a Specific Local Objective (SLO) on the site, identified as COS5 SLO2, which is:

"To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands".

2.10 With regard to the above, SDCC approved a Part 8 scheme to satisfy this SLO on the 11th December 2023. The Part 8 approves extensive upgrades to the facilities at Carrigmore Park to fully satisfy the SLO. Refer to Figure 3 overleaf and schedule of approved works below under said approved Part 8 scheme:

- Provision of a pump track and calisthenics area.
- Provision of a boules court/active age area.

- Upgrading of existing footpaths, to involve the removal and realignment of existing paths.
- Installation of goal posts onto existing soccer pitch.
- The provision of a new sports pitch area (65m x 40m).
- Retaining existing entrances and upgrading where required.
- Provision of a new pedestrian entrance.
- Provision for new entrances to the development lands to the west.
- Renovation of existing hedgerows.
- Planting new trees, hedgerows, and other planting.
- Removal of 12 trees.
- Planting of trees along the verge outside of park.
- Provision of 2 wetland attenuation areas to provide drainage for pitch and enhance biodiversity.
- Planting of a mini woodland for enhanced biodiversity.
- Planting of pleached *Tilia* trees along existing basketball court.
- All associated landscape works including furniture and planting.
- All ancillary works.



Figure 3: Extract from Design Report from Part 8 Approval for Carrigmore Park Upgrades



Development Proposal

2.11 The current LRD proposal is described below; however, we also refer the reader to the following documents, which are submitted as a separate standalone documents, for full and further details of the development proposal:

- Planning Statement prepared by Armstrong Fenton Associates
- Architectural & Urban Design Statement prepared by MCORM & DSA Architects
- Landscape Design Rationale prepared by Gannon & Associates, Landscape Architects.

The proposed development that we are putting forward for consideration can be described as follows:

Kelland Homes Ltd. and Evara Developments Ltd. wish to apply for permission for a Large-scale Residential Development (LRD) on a site located at Boherboy, Saggart, County Dublin. To the immediate north of the site is the Carrigmore residential estate, to the west are agricultural lands and a single dwelling, to the east is the Corbally residential estate and Carrigmore Park, while to the south is the Boherboy Road.

The proposed development consists of 611 no. dwellings, comprised of 306 no. 2, 3, 4 & 4-5 bed, 2 & 3 storey, detached, semi-detached & terraced houses, 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys. The proposed development also includes a 2-storey crèche (c.630m²).

Access to the development will be via one no. new vehicular access point from the Boherboy Road, along with new vehicular connections to adjoining developments at Corbally Heath to the east and Carrigmore Green to the north. Ten no. houses in the south-eastern part of the site will be accessed from Corbally Glade to the east. The proposed development includes for pedestrian and cyclist connections throughout the proposed development and accesses into adjoining lands at Carrigmore Park, Corbally Heath and Corbally Glade to the east and Carrigmore Green to the north.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c.2.3Ha of public open space, and c.4,750sq.m of communal open space associated with proposed development.

The proposed development also provides for (i) all associated site development works above and below ground, including surface water attenuation & an underground foul sewerage pumping station at the northern end of the site, (ii) public open spaces (c.2.3Ha), (iii) communal open spaces (c.4,750sq.m), (iv) hard & soft landscaping and boundary treatments, (v) surface car parking (861 no. car parking spaces), (vi) bicycle parking (711 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) diversion of all existing overhead ESB lines underground, (ix) public lighting, and (x), plant / PV panels (M&E), utility services & 8 no. ESB sub-stations, all on an overall application site area of c.18.7Hha. In accordance with the South Dublin County Development Plan (2022-2028), an area of c.1.03Ha within the site is reserved as a future school site

3.0. Policy Documents Considered

3.1 The following policy documents have informed this Statement:

National Planning Context / Strategic Policy Documents

- Project Ireland 2040 - National Planning Framework, First Revision (2025),
- Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness (2025).

Section 28 Ministerial Guidelines

- Sustainable and Compact Settlements Guidelines for Planning Authorities, (2024),
- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).

Other National Guidance Documents

- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009),
- Climate Action Plan 2019,
- Smarter Travel – A New Transport Policy for Ireland (2009-2020),
- National Sustainable Mobility Policy, 2022.

Regional Planning Context

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019),
- The Transport Strategy for the Greater Dublin Area 2016-2035.

Local Planning Context / Statutory Policy Documents

- South Dublin County Development Plan 2022-2028.

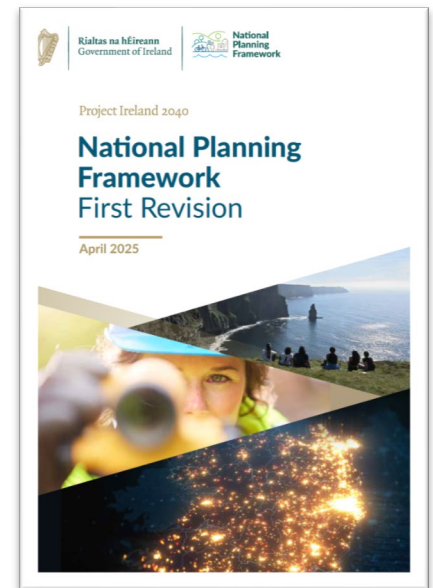
4.0. Statement of Consistency with National Planning Policy

4.1 This section of the Statement sets out the proposed development's compliance with a range of relevant national planning policy documents namely:

- Project Ireland 2040 - National Planning Framework, First Revision (2025),
- Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness (2025).

4.1. Project Ireland 2040 - National Planning Framework (2018)

4.1.1 The Project Ireland 2040 - National Planning Framework (hereafter "NPF") was published in 2018 as the Government's high-level strategic plan for shaping the future growth and development of the country to cater for a projected population increase of c. one million people to the year 2040. The NPF is accompanied by the National Development Plan, a 10 year capital investment strategy. Together they are known as Project Ireland 2040.



4.1.2 In April 2025, the Government approved the Revised National Planning Framework (NPF) and was based on a number of changes that have occurred since the original NPF was published in 2018, including *inter alia* the need to plan for a population of between 6.1 to 6.3 million people by 2040, and plan for approximately 50,000 units per annum over that period, to meet additional population and employment growth over and above the original 2018 NPF projections.

4.1.3 The revised NPF will provide the basis for the review and updating of regional strategies and local authority development plans to reflect matters such as updated housing figures, projected jobs growth and renewable energy capacity allocations, including through the zoning of land for residential, employment and a range of other purposes.

4.1.4 A core element of the NPF's strategy is to deliver compact growth with the key features being summarised as follows:

- To manage more balanced growth between the three regions, the Northern and Western, Southern, and Eastern and Midland Regional Assembly areas, and to manage more balanced growth between these three regions.
- To allow Dublin to grow at a sustainable pace and to ensure that the potential of all areas is realised, we cannot let this continue unchecked with the aim to see a roughly 50:50 distribution of future growth between the Eastern and Midland region, and the Southern and Northern and Western regions combined.
- The five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford – the NPF targets these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.
- Targeting at least (40%) of all new housing to be delivered within the existing built-up

areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.

- 4.1.5** The NPF provides a framework for future development expressed through 10 no. National Strategic Outcomes, as illustrated in Figure 3 overleaf. To achieve these National Strategic Outcomes each of the NPF's 10 no. chapters contain National Policy Objectives (108 no. National Policy Objectives in total) which promote coordinated spatial planning, sustainable use of resources and protection of the environment and the Natura 2000 network.
- 4.1.6** Section 6.6 of the NPF, states that one of its core principles is to: *"Allow for choice in housing location, type, tenure and accommodation in responding to need"*, in addition to tailoring *"the scale and nature of future housing provision to the size and type of settlement where it is planned to be located"*. Therefore, it is put forward that the provision of 611 no. high-quality residential units, comprising a mix of unit sizes and typologies at the subject site will contribute to achieving this core principle of the NPF.
- 4.1.7** The NPF projects a need for approximately 50,000 additional households per annum to 2040, with the Eastern and Midlands Region (including South Dublin County) expected by 2040, to be a Region of around 3 million people, at least half a million more than today. The provision of these new homes should be appropriately located in areas which can support sustainable development, and in cities and larger towns where large-scale housing exists.
- 4.1.8** The NPF also states that: *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*. Section 6.6 of the NPF also states one of its core principles is to: *"Allow for choice in housing location, type, tenure and accommodation in responding to need"*, in addition to tailoring *"the scale and nature of future housing provision to the size and type of settlement where it is planned to be located"*.
- 4.1.9** Based on all the foregoing, it is put forward the current proposal for the development of 611 no. high-quality residential units on the subject site, comprising a variety of unit sizes and typologies will contribute to achieving the above strategy of the NPF.
- 4.1.10.** Appendix 2 of the NPF states that the 2022 population of Dublin City and suburbs as being c. 1,263,219 persons. The average household occupancy rate in Dublin City was 2.48 persons per dwelling in 2022 which compares to a State average household size of 2.74 persons. The NPF refers to smaller household sizes in the future, which is considered may have impacts on the types of housing required to meet demand.

Statement of Consistency:

While the above is not a policy objective of the NPF, it is noted that the proposed development provides for a range of 1, 2, 3 & 4 bed dwellings which are considered to meet the housing demands in South Dublin County and cater for the projected household sizes in the future.



Figure 4: National Strategic Outcomes of the NPF.

▪ **National Policy Objective 7** of the NPF seeks to:

"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth"

▪ **National Policy Objective 8** of the NPF 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 and ensure compact and sequential patterns of growth."

Table 2.1. of the NPF sets out a summary of the key national targets for structuring overall national growth from 2022 to 2040 targeting approx. 470,000 people in the Eastern and Midland Regions with Dublin City and Suburbs to accommodate 295,000 people in that period, and that 50% of new city housing will be located within existing Dublin City and suburbs footprint.

Statement of Consistency:

In accordance with National Policy Objectives 7 and 8 of the NPF, the proposed development will deliver much needed new housing within the existing boundaries of Dublin which will greatly aid the achievement of the targeted population growth for Dublin City and Suburbs up to the year 2040 in accordance with Table 2.1 of the NPF.

Statement of Consistency:

In accordance with the above National Policy Objectives of the NPF, the proposed development will deliver a medium to high density development of modern new homes, within an existing suburban area in one of the five cities identified by the NPF (Dublin City) and thus aid the supply of housing for the targeted population of the Eastern and Midland Region. The proposed development also includes for non-residential uses (creche) capable of providing new employment opportunities. The application site is located proximate to existing public transport (Luas and bus services) which will allow for ease of movement from the development to existing employment centres e.g. Citywest Business Campus and Dublin City centre.

- **National Policy Objective 3 (part of)** - *“Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.”*
- **National Policy Objective 4** - *“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs”.*

Statement of Consistency:

In accordance with the above National Policy Objectives of the NPF, the proposed development will deliver a medium to high density development, i.e. 50 units per hectare net across the entire site. It is considered that the proposed development meets the objective of providing new homes at a location that can support sustainable development at a sufficient scale of provision relative to its location, in particular that the location of new housing be prioritised in existing settlements.

The proposed development caters for a contemporary development of high quality design and amenity, providing for a mix of dwelling typologies that can support the needs of a diverse range of people and living requirements, employment opportunities, and is designed to integrate with the surrounding environs and support / rejuvenate the wider community.

- **National Policy Objective 12** - *“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*

Statement of Consistency:

In accordance with the above National Policy Objective of the NPF, the proposed development provides for a medium to high density residential development located in the existing built-up environs of Dublin City and includes for uses (creche) capable of providing new employment opportunities, in close proximity to various non-residential uses such as Citywest Shopping Centre and Citywest Business Campus to the north-east.

The application site is located proximate to existing public transport (Luas and bus services) which will allow for ease of movement from the development to existing employment centres e.g. Citywest Business Campus and Dublin City centre.

All the proposed dwellings are compliant with the most up-to-date Building Regulations and design standards and the development caters for an ample provision of public and communal open space to ensure the creation of an attractive, liveable, well-designed, new neighbourhood

that will provide for a high-quality of life and well-being for future residents.

It is considered the proposed development of 611 no. dwellings on lands zoned for residential land use meets the objective of providing new homes at a location that can support sustainable development at a sufficient scale, relative to its location, that will drive growth and rejuvenate of the wider area.

Section 4.3 of the NPF states that “Dublin City and immediately adjoining suburban area should therefore plan to grow at a targeted rate of just above the projected national average to 2040, i.e. by around 20% to 25%”, and that “Given Dublin’s scale, this means planning for at least 296,000 more people in the City and suburbs by 2040, in addition to new sustainable communities at brownfield and greenfield locations along planned high capacity public transport corridors in the post- 2030 period”.

▪ **National Policy Objective 16** - “To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.”

City	Population 2022	2018 NPF % Range 2016-2040	Population Growth to 2040 ²⁰		Minimum Target Population 2040
			% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000
Cork - City and Suburbs	223,000	50-60%	40%	96,000	320,000
Limerick - City and Suburbs	102,000	50-60%	40%	44,000	150,000
Galway - City and Suburbs	86,000		40%	36,000	122,000
Waterford - City and Suburbs	60,000		40%	28,000	88,000

Figure 5 – Table 4.1 of the NPF – “Ireland 2040: Targeted Pattern of City Population Growth”

Statement of Consistency:

The proposed development will provide for 611 new dwellings within the built-up area of Dublin. Table 4.1. of the NPF details the 2022 population of “Dublin City and Suburbs” as being 1,263,000 persons, with a targeted population growth of 269,000 persons to the year 2040, giving a minimum population target of 1,560,000 within the life of the NPF. Therefore, in accordance with National Policy Objective 16, the proposed development will deliver much needed new housing within the existing boundaries of Dublin City and its suburbs which will greatly aid the achievement of the targeted population growth for Dublin City and its suburbs up to the year 2040

- **National Policy Objective 29** – *“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”*

Statement of Consistency:

In accordance with the above National Policy Objective, the proposed development provides for a medium to high density residential development located proximate to existing built-up residential areas and includes for non-residential use (childcare) capable of providing new employment opportunities. The subject site is also located proximate to existing public transport (Luas bus services), which will allow for ease of movement from the development to existing employment centres in the vicinity e.g. City West and Tallaght. All the proposed dwellings are compliant with the most up-to-date Building Regulations, design, and planning standards. The proposed development of 611 no. dwellings on lands zoned for residential land use complies with the Core Strategy of the existing South Dublin CDP and the targeted growth figures for the Eastern and Midland Region. The proposed development is therefore considered to be strengthening the vitality of the existing area, encouraging more people, jobs, and activity, and supporting National Policy Objective 29 of the NPF.

- **National Policy Objective 22** - *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.”*

Statement of Consistency

The proposed development puts forward a high-quality residential scheme through the design, layout, materials, and finishes proposed. All the proposed dwellings are compliant with the most up-to-date building regulation, design, and planning standards, in particular those applicable from the existing South Dublin CDP and both the Sustainable Urban Housing: Design Standards for New Apartments (2023) and Planning Design Standards for Apartments (2025).

The proposed development caters for a mix of two and three storey houses and duplex blocks and apartments buildings varying in height from 4-5 and 5 storeys, while also providing a level of density appropriate to the subject site's contextual location that will aid the achievement of targeted growth. The siting and design of individual buildings within the development ensures building heights allow for an appropriate level of sunlight/daylight and amenity. Further details of the proposed building heights and their compliance with relevant Section 28 Ministerial Guidelines can be found in Section 5 of this Statement.

Car parking for the proposed development is in form of on-street and on-curtilage parking, with the layout of parking designed to ensure the development is not visually dominated by parking. Notwithstanding same, the quantum of car parking provided ensures an ample provision of parking for both future residents and visitors – as detailed in Section 3.4 of the submitted Transport Statement (TTA) prepared by Pinnacle Consulting Engineers – please refer to same.

It is considered the proposed development strikes an appropriate balance of the relevant planning standards and achieves well-designed high-quality outcome which ensures public safety is not compromised and the environment is suitably protected

The density of the proposed development accords with the requirements set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as demonstrated in Section 5.5 of this Statement.

Chapter 6 of the NPF focuses on enhancing the quality of life in Ireland's cities, towns, and villages. The NPF acknowledges that it cannot effect change in all dimensions that contribute to quality of life; however, there are some key elements that it will directly impact on, most importantly 'the natural and living environment'. The following National Policy Objectives are considered relevant:

- **National Policy Objective 37** - *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages."*

Statement of Consistency

The proposed development seeks to deliver an appropriate form and scale of residential development proximate to an existing public transport routes, for Luas and bus.

The proposed development has sought to minimise car parking to ensure the development is not dominated by parking and that safety and enjoyment for pedestrians / cyclists is prioritised

The proposed development includes for pedestrian and cyclist connections/accesses to adjoining lands to the north and east, and includes for cycling and pedestrian routes throughout the development.

The proposed development also provides an ample provision of public and communal open spaces which will allow for a range of physical activities to take place within the development

- **National Policy Objective 38** - *"Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services."*

Statement of Consistency:

The proposed development will deliver a medium to high density development of modern new homes. All the proposed dwellings are compliant with the most up-to-date Building Regulations, design, and planning standards, in particular those applicable from the existing South Dublin CDP and both the Sustainable Urban Housing: Design Standards for New Apartments (2023), Planning Design Standards for Apartments (2025), thus providing well-orientated, spacious, units capable of adaptation by future residents should their needs require same over the course of their life.

The proposed development caters for an ample provision of public and communal open space to ensure the creation of an attractive, liveable, well-designed, new neighbourhood that will provide for a high-quality of life and well-being for future residents and provide opportunities for social mixing.

The proposed development includes for pedestrian and cyclist connections/accesses to adjoining lands to the north and east, and includes for cycling and pedestrian routes throughout the development, with the proposed layout designed to minimise car parking as much as feasibly possible to ensure safety and enjoyment for pedestrians / cyclists is prioritised.

The proposed dwellings, upon completion, will be available to purchasers and renters, and 20% of the proposed units are to be put forward for Social and Affordable Housing in accordance with the requirements of the Part V of the Planning and Development Act, 2000 (as amended).

- **National Policy Objective 42** - *"To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040."*

Statement of Consistency:

The proposed development seeks to deliver 611 no. dwellings which will greatly contribute to the existing housing stock.

- **National Policy Objective 43** - *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*
- **National Policy Objective 44** - *"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time."*
- **National Policy Objective 45** - *"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development."*

Statement of Consistency:

The proposed development will deliver a medium to high density development of modern new homes. All the proposed dwellings are compliant with the most up-to-date Building Regulations, design, and planning standards, in particular those applicable from the existing South Dublin CDP and both the Sustainable Urban Housing: Design Standards for New Apartments (2023), Planning Design Standards for Apartments (2025), thus providing well-orientated, spacious, units capable of adaptation by future residents should their needs require same over the course of their life.

The application site is located within the metropolitan area of Dublin City which is identified for significant residential growth over the next two decades. The proposed 611 no. units will provide new residential development on this zoned site, and a childcare facility, which when considered in tandem with the site's location and access to existing public transport infrastructure, ensures that the development is sustainable.

The proposed development will provide a medium to high density residential scheme located proximate to existing residential development on a site zoned for residential development. It is considered the proposed development will transform a zoned greenfield site into a modern high-quality residential area, with the proposed density appropriate to the site's locational context at the edge of the built up, suburban area and at the foothills of the Dublin Mountains.

Chapters 9 & 11 of the NPF focus on the need to provide for a sustainable environmental future and the requirement to assess the impact of new developments on the environment. The following National Policy Objectives are considered relevant:

- **National Policy Objective 66** - *"The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital."*
- **National Policy Objective 67** - *"Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures, while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development."*
- **National Policy Objective 69** - *"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets."*
- **National Policy Objective 76** - *"Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society."*
- **National Policy Objective 77** - *"Enhance water quality and resource management by:*
 - *Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process.*
 - *Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places"*.
- **National Policy Objective 79** - *"Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature based solutions"*.
- **National Policy Objective 89** - *"Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance."*
- **National Policy Objective 92** - *"Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment"*.
- **National Policy Objective 93** - *"Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions."*

- **National Policy Objective 94** - *"Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans."*

Statement of Consistency with the NPF

It is considered that the proposed development is wholly consistent with the above mentioned National Strategic Outcomes and National Policy Objectives of the NPF.

The proposed development is put forward with full consideration to the protection of the environment and with regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital. It is considered the proposed development, through its density, building heights and layout, provides for efficiency in land management and supports the objectives to reduce urban sprawl. The proposed development will be constructed to the most up-to-date Building Regulations and planning standards ensuring energy efficiency within the development. It is considered that the development ensures the protection of environmental features of note, with mitigation measures put in place where necessary, to ensure sustainable development.

This LRD planning application is accompanied by an Environmental Impact Assessment Report (EIAR), Screening for Appropriate Assessment (AA), a Natura Impact Statement and a Site Specific Flood Risk Assessment (SSFRA).

The development supports the population targets for both Dublin and the Eastern & Midland Region contained in the NPF. The development will deliver much needed housing on zoned lands at an appropriate scale and density in an existing built-up area. The NPF seeks to address existing shortages in housing in key urban areas by increasing the quantum of apartments in the State to be more in line with European averages. The NPF notes that in Dublin city, almost 60% of people live in one, two and three person households. The development, through its design, density, and proposed residential mix, supports the targets of the NPF to increase apartment supply in existing urban areas well served by public transport.

With specific regard to 'Dublin City and Metropolitan Area', the NPF states that Dublin needs to "accommodate a greater proportion of the growth it generates within its metropolitan boundaries while offering improved housing choice, transport mobility and quality of life" by requiring a "focus on a number of large regeneration and redevelopment projects within the existing built up footprint, and a more compact urban form, facilitated through well designed higher density development". The proposed development puts forward density and building heights which are appropriate to the site given the design and the contextual location of the development and surrounding environs.

Evaluation of Consistency with the NPF:

In accordance with the National Policy Objectives of the NPF, the proposed development will deliver a medium to high density development of modern and adaptable new homes adjacent to existing built-up residential areas and in close proximity to existing public transport (Luas and bus services) and local service provision.

The proposed development meets the objective of providing new homes at a location that can support sustainable development and is put forward at an appropriate scale of provision relative to its contextual location. Furthermore, the proposed development supports National Strategic

Outcome 1, 'Compact Growth'. The proposed development will provide a high-quality new residential neighbourhood at a sustainable location, on lands zoned for residential land use, and will help to achieve the NPF's overall aims and targeted growth figures for the Eastern and Midland Region. The proposed development will increase the local population and support existing / future public transport, services, and facilities in the area.

Based on all the foregoing, the development of the subject site is considered to be fully in accordance with the policies and objectives of the NPF and sustainable growth patterns.

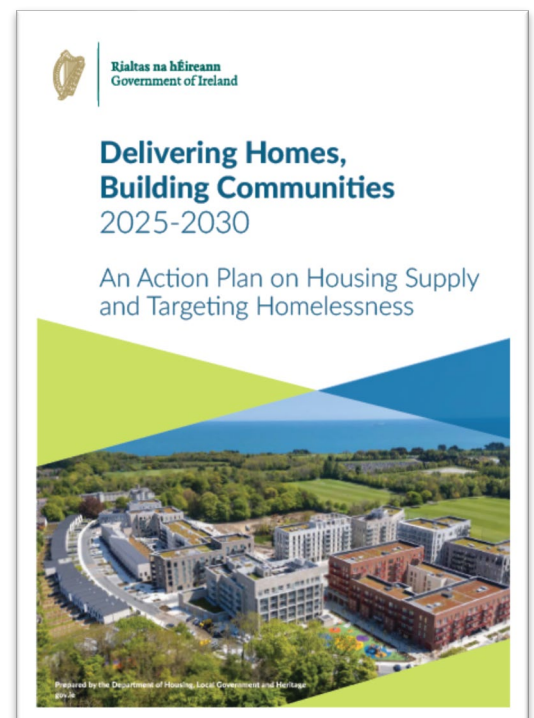
4.2. Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness (2025).

4.2.1 Recently published by the Government, and building upon the First Revision to the NPF, "Delivering Homes, Building Communities" accelerate the delivery of new homes, to deliver 300,000 by the end of 2030. This new plan seeks to significantly accelerate delivery by the private sector through regulatory reform, tax incentives and the largest ever capital investment in the history of the State - €275 billion in infrastructure over ten years through the National Development Plan. The Plan is backed by investment in water, energy and transport infrastructure, as well as regulatory reform, zoning and tax measures, along with state investment to deliver 90,000 affordable supports, 72,000 social homes, and target homelessness.

4.2.2 Delivering Homes, Building encompasses two pillars: "Activating Supply" and "Supporting People".

1. Pillar 1 focuses on activating the supply of 300,000 homes. This will be achieved through *inter alia* activating more land, providing more housing-related infrastructure, securing more development finance for home building, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy.
2. Pillar 2 details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life.

4.2.3 The Action Plan "affirms that housing is the number one priority for all arms of Government, including local government" and "commits to building unprecedented levels of social homes and prioritising those who need the most help". The Plan also "commits to the highest ever investment of the State's resources towards both building more homes and building more infrastructure to support the development of those homes" and "will work with Local Authorities, the Land Development Agency, Approved Housing Bodies and the private sector to drive delivery". One of its core principles is "Expects that all people and organisations, whether public or private, will play their part in tackling the housing crisis".



- 4.2.4** In order to meet current housing demand, the Plan states that *“there is no upper limit to the amount of housing that Government wants to see delivered over the lifetime of this Plan, but a realistic target has been set in the Programme for Government of a minimum of 300,000 new homes. This will have a meaningful impact on the housing market”*. The Plan also anticipates *“that the market will move to a rapid activity phase over the next two years”*.

Evaluation of Consistency with Delivering Homes, Building Communities:

- 4.2.5** The proposed development caters for 611 no. dwellings comprised of 1, 2, 3 and 4 bed houses, apartments and duplex units, with 123 no. of the total of dwellings proposed to be delivered to as Social & Affordable housing, representing 20% of the total dwellings, in compliance with the requirements of Part V of the Planning & Development Act 2000 (as amended). The proposed development is therefore considered to be fully supportive of Pillar 2 of the Plan.
- 4.2.6** The proposed development caters for 611 no. dwellings on a greenfield zoned “Res-N” for new residential development and is located within the existing built-up footprint of Dublin. The proposed development will contribute to the existing housing stock of South Dublin and the targeted growth figures for the County. The proposed development is put forward at a scale and density which is appropriate to the site's locational context and constraints. The proposed development is therefore considered to be fully supportive of the Plan.
- 4.2.7** All proposed dwellings are compliant with the most up-to-date Building Regulations, design, and planning standards, in particular those applicable from the existing South Dublin CDP and both the Sustainable Urban Housing: Design Standards for New Apartments (2023), Planning Design Standards for Apartments (2025), thus providing well-orientated, spacious, units capable of adaptation by future residents should their needs require same over the course of their life. An ample provision of public and communal open space is also catered for within the development, in addition to individual private amenity spaces, to ensure the creation of an attractive, liveable, well-designed, new neighbourhood that will provide for a high-quality of life and well-being for future residents and aid the fostering of a sense of community.

4.3. Housing Commission Report (2024)

- 4.3.1.** In December 2021, the Minister for Housing, Local Government and Heritage established the Housing Commission, as committed to in the 2020 Programme for Government Our Shared Future.
- 4.3.2.** The Commission was tasked with examining issues such as tenure, standards, sustainability and quality-of-life matters, considering long-term housing policy while building on the policy changes outlined in Housing for All.
- 4.3.3.** The report of the Housing Commission was published in May 2024. Whilst not a planning policy document, some of the recommendations of the Report are of note, including the following:

“1. Recognise and prioritise dealing with Ireland's housing deficit and address it through emergency action.



2. *Base housing policy on an assessment of the housing required for a well-functioning society. This should not be conflated with market demand or construction sector capacity.*
3. *Align housing provision and economic development in the National Planning Framework to ensure sufficient housing supply to meet the needs of the population in all parts of the country, including the Dublin region.*
4. *Account must be taken in housing policy of the full economic and social costs associated with not meeting Ireland's housing requirements.*
5. *Ensure that housing policy makes adequate provision for a range of housing and accommodation types to meet the specific needs of identifiable groups."*

Evaluation of Consistency with Housing Commission Report:

- 4.3.1** The Housing Commission Report is informative of the future direction of housing policy in Ireland. Notwithstanding this, the ongoing efficient delivery of housing pending the implementation of the recommendations of the Report is essential.
- 4.3.2** The proposed development will make an important contribution in this respect. The provision of 611 no. dwellings on the subject site will substantially add to the residential accommodation available in South Dublin thus increasing new housing supply.

5.0. Statement of Consistency with Section 28 Ministerial Guidelines and Other National Guidance Documents

5.1. Introduction

5.1.1 This section of the Statement sets out the proposed development's compliance with a range of relevant Section 28 Ministerial Guidelines and other national guidance documents, namely the following:

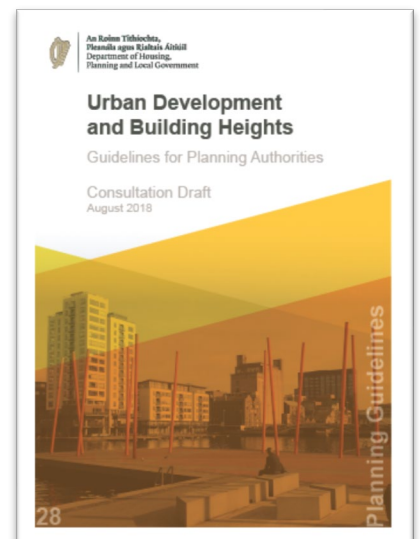
- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025),
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities, (2024),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018),
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009) ,
- Climate Action Plan 2019,
- Smarter Travel – A New Transport Policy for Ireland (2009-2020),
- National Sustainable Mobility Policy, 2022.

5.2. Urban Development and Building Heights Guidelines for Planning Authorities (2018)

5.2.1 The 2018 Urban Development and Building Heights Guidelines (hereafter 'UD&BHG') carry forward the National Policy Objectives of the NPF and the Regional Policy Objectives of the Eastern & Midland Regional Spatial and Economic Strategy (hereafter "E&MRSES"). In summary, the UD&BHG seek to reinforce the need to consolidate and strengthen existing built-up areas, move away from blanket limitations on building height, increase densities within existing urban areas, and promote increased building height in locations with good public transport services.

5.2.2 The UD&BHG clearly state, in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in **appropriate** urban locations. There is therefore a presumption in favour of buildings of increased height in city and town cores and in other urban locations with good public transport accessibility.

5.2.3 The UD&BHG also clearly state that Planning Authorities and An Bord Pleanála (now An Coimisiún Pleanála) are required to have regard to, and apply, any specific planning policy requirements (SPPRs) of the UD&BHG, in carrying out their functions, and that SPPRs



stated in the UD&BHG take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

- 5.2.4** The UD&BHG emphasise that the achievement of the NPF Objectives and Outcomes requires increased density, scale, and heights in town and city cores. Significant emphasis is also placed on promoting development within the existing urban footprints and utilising existing sustainable mobility corridors and networks: *"In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks"*.
- 5.2.5** Of particular relevance to the current development proposal, sections 3.4 to 3.6 of the UD&BHG have regard to "Building height in suburban/edge locations (City and Town)". It is noted in section 3.4 of the UD&BHG that newer housing developments at the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards), delivering medium densities in the range of 35-50 dwellings per hectare.
- 5.2.6** Section 3.7 of the UD&BHG goes on to state: *"such development patterns are generally appropriate outside city centres and inner suburbs, i.e. the suburban edges of towns and cities, for both infill and greenfield development and should not be subject to specific height restrictions"*.
- 5.2.7** To this end, SPPR 4 of the UD&BHG is of particular relevance with the proposed development's compliance with same discussed in Table 2 below.

Statement of Consistency with the UD&BHG:

- 5.2.8** The proposed development consistency with the 4 no. SPPRs of the UD&BHG is detailed in Table 2 below:

SPPR 1: *In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.*

Statement of Consistency:

The subject site is located in the outer suburbs of Dublin, directly adjoining long established existing suburban development to the north and east and therefore connected to the built environment at Citywest and Saggart. The site is not identified as an area where increased building height will be actively pursued.

The proposed development caters for an appropriate grading of building heights across the site, with house typologies of 2 and 3 storeys, duplex typologies of 2-3 storeys, and apartment buildings of 4-5 & 5 storeys, while also providing a level of density appropriate to the subject site's contextual location that will aid the achievement of targeted growth. The siting and

design of individual buildings within the development ensures building heights allow for an appropriate level of sunlight/daylight and amenity.

The proposed development does seek to put a limit on building height, rather the proposed development seeks to put forward a development which responds to the sloping topography of the area and the character of the surrounding area, whilst also seeking to provide a form and density of development which makes the best and most efficient use of this zoned site.

It is considered given the density proposed and the site's locational context, directly adjoining existing residential development and within the catchment of public transport, together with the need to protect both existing residential and natural amenity, that the proposed development is in accordance with SPPR 1 of the UD&BHG.

SPPR 2: *In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.*

Statement of Consistency:

The entirety of the subject site is currently zoned objective "Res-N": "To provide for new residential communities in accordance with approved area plans" in the existing South Dublin CDP. In accordance with the current "RES-N" land-use zoning objective, the current proposal for the development of 611 no. residential dwellings and a childcare facility on the subject site is considered appropriate mix of uses and in compliance with the land-use zoning objective attached to the site.

Given all the foregoing, it is considered the proposed development is in accordance with SPPR 2 of the UD&BHG.

SPPR 3: *It is a specific planning policy requirement that where;*

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

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

(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme

(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.

Statement of Consistency:

The criteria referenced in part (A) of SPPR 3 refers to assessment at 3 no. scales, being:

- At the scale of the relevant city/town;
- At the scale of district/ neighbourhood/ street;
- At the scale of the site/building.

It is noted that specific assessments may also be required at some or all of the above scales to support proposals at some or all of these scales.

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.”

There are numerous bus operators providing a bus services locally and within walking distance to the site, notably the following bus services: No. 65B Poolbeg Street – Citywest, No. 77A between Ringsend and Citywest, and S8 route from Kingswood Avenue to Dun Laoghaire. The proposed development provides pedestrian and cyclist linkages to existing footpath and cycle links to Citywest Road to the east, where there are 2 no. bus stops serving these routes. The walking distance to these bus stops from the site will be approximately 10 minutes.

Similarly, the proposed development will provide for connectivity to the Fortunestown Luas Stop via Carrigmore, which will be a circa 8 minute walk from the northern portion of the proposed development and approximately 10 minutes from the southern portion.

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.

Judicious consideration has been paid to the design and layout of the proposed development in terms of its assimilation into the receiving environs at the edge of the built-up suburban area of South Dublin County. The subject lands have been zoned for new residential land use for many years. The proposed development will make use of a large vacant landbank that is zoned for residential development in a suburban location that is well provided for in terms of social infrastructure and connectivity to public transport. The development of the subject site will present an opportunity to create a new community.

The subject site is ideally suited for development at suitable densities, with its suburban context at the edge of the built-up area, connectivity to public transport and availability of employment opportunities and local services and facilities in Citywest and Saggart. The proposed development includes significant areas of open space, along with considerable retention of existing hedgerows and biodiversity buffers, all free from development. The proposed layout also provides multiple pedestrian connections through the development.

The topography of the site is an important consideration, allowing the proposed taller buildings to be situated to the northern (lower) part of the site, with the lower height mostly in the form of traditional suburban housing occupying the higher parts of the site to the south. This approach ensures that the development and height strategy for the site appropriately

responds to the topography of the site, as well as adhering to the original development principles for the site as set out in the now expired Fortunestown Local Area Plan (LAP, 2012).

The site is not in an architecturally sensitive area. Nonetheless, the design approach takes cues from the existing character of the area whilst balancing this against the need to provide a high-quality modern housing environment for its new residents, delivered to modern day standards.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The layout of the proposed development and the distribution of varying building heights has taken into account the topography of the site, the need to create appropriate relationships to existing residential to the north and east. Verified views, CGIs and a landscape visual assessment are included in this LRD planning application to demonstrate that the proposed building heights will not impact on the receiving environment.

In consideration of the receiving environs, the submitted Architectural & Urban Design Statement demonstrates that various character areas are proposed throughout the development that responds to the locational context of the site – please refer to same.

At the scale of district / neighbourhood / street

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

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

“The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).”

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

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

The application site can be described as a greenfield, outer suburban site and the proposed development is comprised of housing of a scale and character that is in keeping with existing and permitted development in the surrounding environs, whilst also ensuring that the relatively significant scale of the site is utilised to provide appropriate scale and density of development in accordance with national and regional policy. Internally within the site, buildings address the streets creating good street frontage and new open spaces for use by the wider community are created that connect to adjoining lands thus creating and improving the local environment.

The design of the buildings is modern, which directly overlook the streets / spaces they address, with the facades well fenestrated. There are no large, blank walls / gables proposed. The distribution of materials across the entire development has been carefully considered in the creation of character areas within the scheme, details of which are set out in the submitted Architectural & Urban Design Statement.

This LRD planning application includes a Site-Specific Flood Risk Assessment (SSFRA) which confirms that the proposed development was subject to and passed the Development Management Justification Test. The enclosed SSFRA concludes that proposed development is not at risk of flooding, will not increase flood risk elsewhere, and is therefore appropriate from a flood risk perspective.

Furthermore, SUDs principles have been a key consideration in the scheme evolution. We refer to the Drainage and Water Infrastructure Engineering Report by Roger Mullarkey & Associates for further detail, however, in summary the following is noted:

- All surface water will drain to SuDS elements in accordance with the SDCC Sustainable Drainage Explanatory design & Evaluation Guide 2022.
- Only one underground attenuation tank is proposed with nine no. above ground, natural attenuation areas / detention basins proposed. The maximum top water levels in each of the 9 separate catchments is more than 500mm below the lowest floor level of any dwelling drained by that network. Full SuDS treatment train approach has been implemented. SUDs principles have been a key consideration in the scheme evolution.
- The appropriate SuDS features included in this proposal include the following;
 - Green Roofs for the flat roof areas of the apartment blocks and the roof of the creche
 - Rain Garden planters to the rear down pipes of the houses
 - Permeable paving to all private parking areas for drainage of roads and front roofs of the houses
 - Filter Swales adjacent to roadways where feasible
 - Tree pits where practically feasible
 - Use of the existing centrally located Cooldown watercourse and hedgerow as a conveyance swale
 - Bio-Retention areas draining roads/paths and roofs
 - Silt-trap/catchpit manholes
 - Hydrobrakes limiting flow to the total Qbar greenfield rate
 - 9 no. open detention basins and 1 no. below ground retention storage system
- The surface water runoff rate has been restricted to the greenfield runoff rate.

The taller buildings in the scheme, i.e. the duplexes and apartment buildings are all carefully positioned addressing streets and focused to the north of the site where site levels are lower, adjacent to and enclosing open spaces, all of which contributes to the legibility of the scheme and creates good urban street frontage and aids way finding through the development.

The proposed development caters for an appropriate grading of building heights across the site, with house typologies of 2 and 3 storeys, duplex typologies of 2-3 storeys, and apartment buildings of 4-5 & 5 storeys, while also providing a level of density appropriate to the subject site's contextual location that will aid the achievement of targeted growth. The siting and design of individual buildings within the development ensures building heights allow for an appropriate level of sunlight/daylight and amenity.

It is considered that the wide range of housing typologies proposed across the scheme in a variety of buildings and associated heights positively contributes to the mix dwelling typologies and uses available in the neighbourhood.

At the scale of the site/building

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

The proposed development caters for an appropriate grading of building heights across the site, with house typologies of 2 and 3 storeys, duplex typologies of 2-3 storeys, and apartment buildings of 4-5 & 5 storeys.

Given the nature and scale of the proposed development, it is not considered overshadowing and/or loss of light are issues of note. The proposed layout has been carefully designed to ensure all dwellings are orientated to maximise access to natural daylight to ensure all living spaces, private amenity spaces and public and communal open spaces received an appropriate amount of daylight/sunlight. Given the sensitive location of the subject site, its greenfield nature and relatively extensive size, the proposed building heights and typologies proposed can be delivered in a manner which ensures good internal daylight access, protection of daylight access to existing neighbouring properties, appropriate sunlight access to public, communal and private open spaces both internal and external to the site.

“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’.”

Digital Dimensions have prepared the enclosed Daylight/Sunlight Assessment of the proposed apartment units which confirms that all habitable rooms meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition). The enclosed assessment also states that the assessment of daylight is in accordance with IS EN 17037:2018, shown for supplementary information, the vast majority of habitable rooms achieve daylight provision as set out in IS EN 17037:2018. The assessment also states that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 (third edition) and no compensatory measures are required. We refer the reader to the enclosed Daylight/Sunlight Assessment for full details.

“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.”

Digital Dimensions have prepared the enclosed Daylight/Sunlight Assessment of the proposed apartment units which states that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to

in the BRE guidelines BR209:2022 (third edition) and no compensatory measures are required. We refer the reader to the enclosed Daylight/Sunlight Assessment for full details.

Specific Assessments

“Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.”

Given the nature and scale of the proposed development, which includes for maximum building heights of five storeys, this assessment is not considered to be required. Notwithstanding same, this LRD planning application is accompanied by a fully detailed Environmental Impact Assessment Report (EIAR) which considers factors such as noise, air and climate and we refer the reader to same for further details.

“In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.”

Given the nature and scale of the proposed development, which includes a maximum building height of five storeys, this assessment is not considered to be required. Notwithstanding same, this LRD planning application is accompanied by a fully detailed Environmental Impact Assessment Report (EIAR) which considers factors such as birds, bats and biodiversity and we refer the reader to same for further details.

“An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.”

Given the nature and scale of the proposed development, which includes for maximum building heights of five storeys, this assessment is not considered to be required.

“An assessment that the proposal maintains safe air navigation.”

Given the nature and scale of the proposed development, which includes for maximum building heights of five storeys, this assessment is not considered to be required.

We refer the reader to Section 12 of the accompanying Planning Statement which provides further assessment of the proposed development in the context of the policy in the County Development Plan relating to Casement Aerodrome.

“An urban design statement including, as appropriate, impact on the historic built environment.”

The site is not in a location which is constrained by historic built environment issues, with Citywest being a more recently developed settlement.

This LRD planning application is accompanied by an Architectural & Urban Design Statement prepared by MCORM & DSA Architects and a Landscape Design Rationale prepared by Gannon & Associates, Landscape Architects. In addition, a fully detailed Environmental Impact Assessment Report (EIAR) which considers factors such as archaeology and cultural

heritage is also enclosed and we refer the reader to each of the aforementioned documents for further details.

“Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.”

An Appropriate Assessment (AA) Screening Report has been prepared by Scott Cawley Consulting Ecologists for the proposed LRD on the subject site and is enclosed as a separate standalone document to which we refer the reader for full details. However, the enclosed AA Screening Report has assessed the impact of the proposed development on the following Qualifying Interest (QI) habitats and/or the QI/Special Conservation Interest (SCI) species of a European site(s):

- Glenasmole Valley SAC (001209),
- Wicklow Mountains SAC (002122),
- Wicklow Mountains SPA (004040),
- Rye Water Valley/Carton SAC (001398),
- Red Bog, Kildare SAC (000397),
- Poulaphouca Reservoir SPA (004063),
- South Dublin Bay SAC (000210),
- South Dublin Bay and River Tolka Estuary SPA (004024),
- North Bull Island SPA (004006),
- North Dublin Bay SAC (000206),
- North-west Irish Sea SPA (004236),
- Rockabill to Dalkey Islands SAC (003000),
- Baldoyle Bay SPA (004016),
- Malahide Estuary SPA (004025),
- Rogerstown Estuary SPA (004015).

The AA Screening Report concludes that *“Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded”* and that *“In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered. Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)”*.

The proposed development has also been subject to a comprehensive Environmental Impact Assessment Report (EIAR). The submitted EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment, where considered necessary. These mitigation measures have been incorporated into the design of the proposed development

to avoid or reduce the effects on the environment, as appropriate. For full details, please refer to the EIAR, prepared by DNV, which accompanies the application.

Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

SPPR 4: *It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

Statement of Consistency:

The proposed development caters for 611 no. dwellings on a gross site area of c.18.7 hectares and a net site area of c.12.2 hectares, therefore, equates to a proposed net density of c. 50 dwellings per hectare. As will be described further in relation to the Section 28 Guidelines for Planning Authorities on Sustainable Residential Development and Compact Settlements (2024), this density is considered to be fully in accordance with the Guidelines.

In the context of the aforementioned 2024 Guidelines, the subject site can be considered a "City – Suburban / Urban Extension" site. Table 3.1 of the Guidelines defines these areas as "Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) developments. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin...".

Appendix B of the Guidelines allows the following parameters to be excluded from the gross site area in order to calculate the net developable area and in turn the resultant net density of development:

- Major road/streets such as Arterial Streets and **Link Streets** as defined by Section 3.2.1 DMURS.
- **Lands for primary schools**, churches and other community services and facilities.
- Larger, Regional or District Parks, **Wayleaves** or rights of way.
- Other areas of land that cannot be developed due to **environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding** [our emphasis added].

Taking into account the above guidance, the area of land within the subject site that is covered / occupied by (a) the reserved school site, (b) the proposed north-south link street traversing the centre of the site, (c) two no. drainage wayleaves, as coloured yellow on the submitted site layout plan and (d) retention of hedgerows, creation of biodiversity buffers free from development and topography, have all been discounted from the gross site area of c.18.7Ha, resulting in a net developable area of c.12.2Ha. Therefore, the proposed

development has a net density of c. 50 dwellings per hectare and is therefore considered to secure the minimum density for such locations as set out in the Guidelines.

The proposed development is also considered to secure an appropriate mix of building heights and typologies relevant to the subject site's sensitive location at the foothills of the Dublin Mountains, with the southern part of site having semi-rural characteristics and avoids mono-type building typologies - as demonstrated in the submitted drawings and Architectural & urban Design Statement which accompany this LRD application – please refer to same for further details.

Given all the foregoing, it is considered the proposed development fully complies with SPPR 4 of the UD&BHG.

Table 1: Consistency with SPPRs of the UD&BHG.

5.2.9 Evaluation of Consistency with the UD&BHG

Given all the foregoing as set out in Section 5.2 of this Statement, it is respectfully submitted the proposed development is fully compliant with all the SPPRs and stated criteria of the UD&BHG and, as such, in light of any conflicting policies and objectives of the existing South Dublin CDP and having regard to the development's compliance with the SPPRs of the UD&BHG, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with national planning policy.

NOTE:

Re: The Sustainable Urban Housing: Design Standards for New Apartments (2023) and the Planning Design Standards for Apartments (2025).

In relation to the relevant guidelines for the design of apartments, we note the issuing of updated guidelines by the Minister i.e. the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025 which supersede Sustainable Urban Housing: Design Standards for New Apartments (2023). However, we understand that the most recent 2025 guidelines are now subject to a judicial review process and that the High Court is to hear a legal challenge in December on same. Taking this into consideration, the proposed apartments / duplex units have been designed in accordance with the preceding 2023 Apartment Guidelines which require larger units and more onerous standards than the 2025 guidelines.

Therefore, the following sections 5.3 and 5.4 provide details of the proposed development's compliance with **both** the Sustainable Urban Housing: Design Standards for New Apartments (2023) and the Planning Design Standards for Apartments (2025), respectively.

5.3. **Sustainable Urban Housing: Design Standards for New Apartments (2023)**

5.3.1 The Sustainable Urban Housing Design Standards for New Apartments (2023) guidelines were initially approved by the Government in 2015; however, they were subsequently updated / amended in July 2023.

5.3.2 The Sustainable Urban Housing: Design Standards for New Apartments guidelines (hereafter “the 2023 Apartment Guidelines”) apply to all housing developments that include apartments that may be made available for sale or rental purposes and, unless stated otherwise, apply to both private and public schemes.

5.3.3 The 2023 Apartment Guidelines aim to address the sustained and growing demand for this form of housing by ensuring a greater delivery of apartments in Ireland’s cities and towns. The 2023 Apartment Guidelines also aim to ensure all apartment developments cater for an attractive and desirable living environment for a range of household types and tenures.

5.3.4 The 2023 Apartment Guidelines are supported by legislation which introduces powers whereby the Minister may expressly state Specific Planning Policy Requirements (SPPRs) which must be applied by planning authorities, or An Bord Pleanála, in the exercise of their functions.

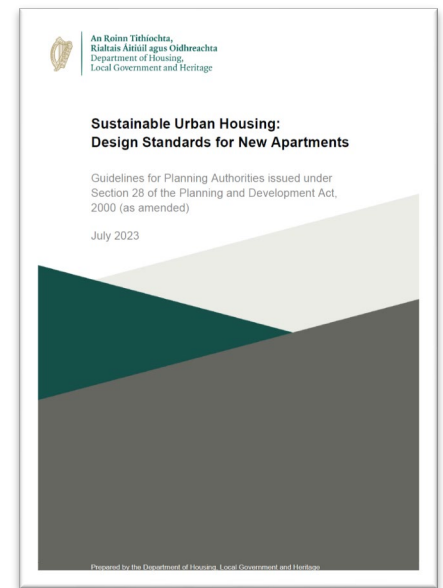
5.3.5 Where specific planning policy requirements are stated in the Guidelines, the Minister intends that such requirements must take precedence over policies and objectives of development plans, local area plans or SDZ planning schemes.

5.3.6 The 2023 Apartment Guidelines specify SPPRs for:

- Unit Mix
- Gross Floor Areas
- Dual Aspect Ratios
- Floor to Ceiling Heights
- Apartments to Stair/Lift Core Ratio
- Shared Accommodation / Co-Living Developments

5.3.7 The 2023 Apartment Guidelines also detail the requirements for the following:

- Internal Space/Room Standards
- Storage Spaces
- Private Amenity Spaces including Balconies / Terraces
- Communal Amenity Space
- Car & Bicycle Parking
- Children’s Play Areas



**Statement of Consistency with the 2023 Apartment Guidelines**

5.3.8 The proposed development consistency with the 7 no. SPPRs of the 2023 Apartment Guidelines is detailed as follows:

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. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

Statement of Consistency:

The proposed development consists of 611 no. residential dwellings, comprised of:

Proposed Development:		
Dwelling Type	No. of Units	% Mix
Apartments	172	28%
Duplexes	133	22%
Houses	306	50%
Total No. Units	611	100%
Unit Mix (Apartments)	No. of Units	% Mix
1 Bed (2 persons)	46	27%
2 Bed (3 person)	1	1.00%
2 Bed (4 Person)	123	72%
3 Bed (5 person)	2	1.00%
Total No. Apartments	172	100%
Unit Mix (Duplexes)	No. of Units	% Mix
1 bed (2 person)	11	8%
2 Bed (4 Person)	46	35%
3 Bed (5 person)	76	57%
Total Duplexes	133	100%
Unit Mix (Houses)	No. of Units	% Mix
2 bed	30	9.8%
3 Bed	243	79.4%
4 bed	26	8.50%
4 bed / 5 bed	7	2.29%
Total Houses	306	100%
Unit Mix (Total)	No. of Units	% Mix
1 bed	57	10
2 bed	194	32
3 bed	327	53
4 bed	26	4
4 bed / 5 bed	7	1
Total Units	611	100%

The number of proposed one-bed apartment and duplex units (57 no.) represents c. 9 % of the total mix. There are no studio units proposed. The proposed development is therefore compliant with SPPR 1 of the 2023 Apartment Guidelines.

SPPR 2: For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;
- Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;
- For schemes of 50 or more units, SPPR 1 shall apply to the entire development;

All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.

Statement of Consistency:

The proposed development does not cater for a building refurbishment scheme or urban infill scheme and therefore SPPR 2 of the 2023 Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 2 of the 2023 Apartment Guidelines.

SPPR 3: Minimum Apartment Floor Areas:

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

Statement of Consistency:

As detailed on the submitted floor plan drawings prepared by MCORM & DSA Architects, all the proposed apartment / duplex units meet with and/or exceed the minimum apartment floor areas stated in SPPR 3 of the 2023 Apartment Guidelines. The proposed development is therefore compliant with SPPR 3 of the 2023 Apartment Guidelines.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the 2023 Apartment Guidelines.

SPPR 4: In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- i. A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.
- ii. In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

iii For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

Statement of Consistency:

The subject site is in a suburban location and as such a dual aspect requirement of 50% applies. Of the proposed 305 no. apartment and duplex units, approximately 117 no. units (c. 38%) are single aspect, and these are identified in the submitted HQA – please refer to same. The remainder of the proposed apartments and duplex units are dual and triple aspect (c.62%). The table below provides a summary of the aspect of the proposed apartments and duplex units:

Block	Total No. of Units	No. of Single Aspect Units	No. of Dual Aspect Units	No. of Triple Aspect Units
Apartment A	40	20	20	0
Apartment A1	26	8	16	0
Apartment B	40	20	20	0
Apartment B1	33	12	21	0
Apartment C1	33	17	15	1
Duplex Block A	12	8	4	0
Duplex Block B1	12	8	4	0
Duplex Block B2	12	8	4	0
Duplex Block B3	12	8	4	0
Duplex Block D	12	8	4	0
Duplex Block D1	17	0	17	0
Duplex Block E1	4	0	0	4
Urban Block F1	12	0	8	4
Urban Block G1	16	0	12	4
Urban Block G2	4	0	4	0
Urban Block H1	20	0	20	0
Total	305	117 (c.38%)	173 (c.57%)	13 (c.4%)

The proposed development fully complies with this requirement and as such the proposed development is therefore compliant with SPPR 4 of the 2023 Apartment Guidelines.

SPPR 5: Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Statement of Consistency:

All the proposed ground level apartments achieve the minimum of 2.7m floor to ceiling height as required. Please refer to the submitted block plans prepared by MCORM & DSA Architects for full details.

The proposed development is therefore compliant with SPPR 5 of the 2023 Apartment Guidelines.

SPPR 6: A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

Statement of Consistency:

All the proposed apartment / duplex blocks are designed to ensure the stated units per floor per core is not exceeded.

The highest number of units accessed from a single core is 8 no. in Blocks A, B and B1. Please refer to the submitted block plans prepared by MCORM & Davey + Smith Architects for full details.

The proposed development is therefore compliant with SPPR 6 of the 2023 Apartment Guidelines.

SPPR 7: There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.

Statement of Consistency:

The proposed development does not cater for any shared accommodation/co-living units and, therefore, SPPR 7 of the 2023 Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 7 of the 2023 Apartment Guidelines.

Table 2: Consistency with SPPRs of the 2023 Apartment Guidelines.

5.3.9 In addition to the above SPPRs, the 2023 Apartment Guidelines also detail several other development factors which are considered in Table 4 below.

Section 2.4 of the Apartment Guidelines identifies the types of location that may be suitable for apartment development, with the guidelines outlining three types of locations:

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

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided.

Statement of Consistency:

In this context the subject site is considered a "Intermediate Urban Locations" having regard to the proximity to public transport. As described previously, the proposed development will provide for connectivity to the Fortunestown Luas Stop via Carrigmore, which will be a circa 8 minute walk from

the northern portion of the proposed development and approximately 10 minutes from the southern portion.

In respect of this type of location, the Guidelines state that:

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

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services. The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors".*

It is accepted however that the subject site also displays some characteristic of peripheral locations. In this respect, the density of the proposed development has taken into account the fact that the site could be considered to straddle these two location types as set out in the Guidelines.

The net density is calculated in accordance with the guidance set out in the Compact Settlement Guidelines for Planning Authorities (2024):

- Gross site area of c.18.7 hectares
- In accordance with Appendix B of the Compact Settlement Guidelines, the following areas are excluded from the gross site area in order to determine the net site area for density purposes:
 - Land reserved for a future school - c.1.03 Ha (10,311sq.m),
 - Designated flood zone - c.0.69Ha (6,892sq.m),
 - Two no. drainage wayleaves traversing the site - c.1.33Ha (13,312sq.m),
 - South-western portion above the 120m contour line / steeply sloped part of the site - c.0.49 Ha (4,972sq.m)
 - Hedgerow along the western boundary and its 10m buffer zone - c. 0.66Ha (6,581sq.m),
 - 10m buffer from the top of the stream bank along the eastern boundary - c. 1.24Ha (12,440sq.m)
 - Area occupied by central ditch - c.0.8Ha (8,044sq.m)
 - The centrally located north-south "Link Street" c. 0.4Ha (4,024sq.m).
 - Total = c.6.45Ha (64,455sq.m)
 - Resultant net developable area = c.12.2Ha (122,247sq.m)

Based upon the above, the delivery of 611 units on a net developable site area of c.12.2 hectares provides a net density of c.50 units per hectare.

The Compact Settlement Guidelines provide density ranges which is broken down into different areas. The subject site can be described as being located in: "City Suburban/Urban Extension". These areas are described as being: *"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the twentieth and early twenty first century, while urban extension refers to the greenfield lands at the edge of the built up area that are zoned for residential or mixed-use (including residential) development. It is a policy*

and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations, and that densities of up to 150 dph (net) shall be open for consideration at accessible urban locations (defined in Table 3.8)"

It is considered that given the location of the site in close proximity to a number of surrounding services, including existing public transport links, that the proposed density for the subject site is appropriate in this instance, and accords with the guidance set out in Table 3.1 of the Compact Settlement Guidelines. The proposed density is also put forward with consideration to the guidance of the NPF, the UD&BHG and the 2023 Apartment Guidelines.

In relation to the above exclusions from the gross site area for density purposes, the following is noted:

- The school reservation is clearly not developable area for residential purposes and is excluded in accordance with Appendix B of the Guidelines which explicitly states that lands for schools should be excluded.
- The link access road is considered to be a 'Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS' as set out at Table 1 of Appendix B of the Guidelines. The link road is a six year roads objective under Table 7.5 of the County Development Plan.
- The site layout plan provides for a 10m riparian exclusion zone for development along the eastern boundary of the site, from the top of the bank of the Corbally Stream as well as a 10m biodiversity buffer along the western boundary of the site, and in accordance with Table 1 of Appendix B is "Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding".
- The western, central and eastern hedgerows and the flood zone to the north also fall within the category in Table 1 of Appendix B of "Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding".

Sections 3.5 – 3.7 of the Apartment Guidelines make provision for a two-bedroom three person apartment typology with a minimum floor area of 63 sq.m, subject to any such dwelling typology not representing more than 10% of the total number of units in any private residential development.

Statement of Consistency:

There is only 1 no. 2 bed / 3 person unit proposed in the entire development and as such the proposed development is fully compliant.

Section 3.8 of the Apartment Guidelines requires the majority of all apartments in any scheme of 10 or more apartments exceed the stated minimum floor area standards by a minimum of 10%.

Statement of Consistency:

In compliance with the above requirement, the proposed apartments & duplex units should have a total minimum floor area of 21,985sq.m. An additional 10% of same would equate to 24,183.5sq.m. The 305 no. proposed apartment / duplex units, have a total floor area of 26,103.33sq.m thus exceeding the minimum floor area standard by more than 10%.

Section 3.30 of the Apartment Guidelines details all proposed units should provide for the general storage and utility in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:

- Studio Unit – 3 sq.m
- One bedroom unit – 3 sq.m
- Two bedroom (three person unit) – 5 sq.m
- Two bedroom (four person unit) – 6 sq.m
- Three person unit – 9 sq.m

Statement of Consistency:

As detailed on the submitted floor plans prepared by MCORM & DSA Architects, all proposed apartment / duplex units comply with this requirement for storage.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines.

Sections 3.35 – 3.36 of the Apartment Guidelines details all proposed units should be provided with private amenity space in the form of patios / terraces for ground floor units and balconies for upper floor units in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:

- Studio Unit – 4 sq.m
- One bedroom unit – 5 sq.m
- Two bedroom (three person unit) – 6 sq.m
- Two bedroom (four person unit) – 7 sq.m
- Three person unit – 9 sq.m

Statement of Consistency:

As detailed on the submitted floor plans prepared by MCORM & DSA Architects all proposed apartment / duplex units comply with this requirement for private amenity space.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the 2023 Apartment Guidelines.

Section 4.10 of the Apartment Guidelines seeks the provision of accessible, secure, and usable outdoor communal amenity space in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:

- Studio Unit – 4 sq.m
- One bedroom unit – 5 sq.m
- Two bedroom (three person unit) – 6 sq.m
- Two bedroom (four person unit) – 7 sq.m
- Three person unit – 9 sq.m

Statement of Consistency:

As detailed on the submitted plans prepared by MCORM & DSA Architects, an ample provision of communal space is provided for the proposed apartment / duplex units. Based on the mix of

apartments and duplex units proposed, the development has the following requirement for communal open space:

Apartment / Duplex Type	No. of Units Proposed	Required Communal Open Space Per Unit (sq.m)	Total Communal Open Space Required (sq.m)
One Bed Unit	57	5	285
Two Bed (Three Person) Unit	1	6	6
Two Bed (Four Person) Unit	169	7	1,183
Three Bed Unit	78	9	702
Total	305	-	2,176m²

As detailed in table above, the proposed development has a requirement for the provision of 2,176sq.m. of communal open space. The proposed development puts forward a total provision of 4,750sq.m. and, therefore, complies with the above requirement.

The location and orientation of each communal open space have been carefully considered to maximise use of space and receipt of sunlight and daylight throughout the day. We confirm, for clarity, the above stated communal open space provision is provided for in addition to the proposed private or public open space provisions. The locations of the proposed communal open spaces can be identified on the submitted Gannon & Associates landscape Architects drawing no. 24212_Boherboy_PA_H_OS "Open Space Landscape Plan".

Sections 4.13 – 4.14 of the Apartment Guidelines make provision for children's play areas, which the guidance stating such areas should be catered for:

- within the private open space associated with individual apartments,
- within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,
- within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.

Statement of Consistency:

The proposed development includes a children's play facilities as appropriate. The play strategy of the proposed development is detailed in the Landscape Design Rationale prepared by Gannon & Associates Landscape Architects which accompanies the application – please refer to same for further details. A variety of play equipment is proposed within public and communal open spaces integrated within the wider landscape and ideally located to allow for passive surveillance. Play equipment is detailed in the submitted Landscape Design Report (section 5.5) and drawing no. 24212_Boherboy_PA_B_PP "Play Provision" prepared by Gannon & Associates Landscape Architects which are enclosed with this application. Given all the foregoing, it is considered that the proposed development is compliant with the 2023 Apartment Guidelines in this regard.

Sections 4.15 – 4.19 of the Apartment Guidelines detail the need to make provision for secure bicycle parking facilities within apartment developments. It is stated that, in general, a standard of 1 no. cycle storage space per bedroom shall be provide, along with 1 no. visitor cycle parking per

every 2 no. residential units. It is noted that the planning authority has the discretion to deviate from these standards.

Statement of Consistency:

The proposed development caters for a total of 711 no. cycle spaces for the 305 no. proposed apartment / duplex units, which is considered appropriate and generally in compliance with the above stated standard.

Section 4.23 of the Apartment Guidelines states that *"In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard"*.

Section 4.23 states "As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required."

Statement of Consistency:

The proposed development consists of 611 no. dwellings, comprised of 306 no. houses and 305 no. duplex units and apartments. There are 155 no. car parking spaces for the proposed 133 no. duplex units (i.e. 1.1 spaces per unit). There are 115 no. car parking spaces for the proposed 172 no. apartments (i.e. 0.6 spaces per unit).

Section 6 of the Apartment Guidelines has regard to "Apartments and the Development Management Process". Within same, the following are noted:

- Section 6.1 states all applications for apartment schemes must submit a schedule detailing the number and type of apartments and associated individual unit floor areas.
- Section 6.12 of the Apartment Guidelines states planning applications for apartment development shall include a building lifecycle report, including for an assessment of long term running and maintenance costs and measures specifically considered to effectively manage and reduce costs for the benefit of residents.

Statement of Consistency.

Please refer to the submitted HQA and Building Life Cycle report, which are enclosed as separate documents for details, which comply with the requirements of the 2023 Apartment Guidelines.

Appendix 1 of the Apartment Guidelines details the minimum room widths / areas / aggregate areas for individual kitchen/living/dining and bedrooms for apartments.

Statement of Consistency:

As detailed on the submitted floor plans prepared by MCORM & DSA Architects all proposed apartment / duplex units comply with the stated requirements in this regard. This is reaffirmed in the details set out in the enclosed HQA – please refer to same.

Table 3: Consistency with the Apartment Guidelines.

Evaluation of Consistency with the 2023 Apartment Guidelines

- 5.3.10** Given all the foregoing as set out in Section 5.3 of this Statement, it is respectfully submitted the proposed development is fully compliant with all the SPPRs and stated criteria of the Apartment Guidelines. As such, in light of all of the foregoing and having regard to the development's compliance with the SPPRs of the 2023 Apartment Guidelines, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the national policy.

5.4. Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)

The Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) were issued in July 2025 and replace the previous Sustainable Urban Housing Design Standards for New Apartments were originally issued by the Minister for Housing, Planning and Local Government and published in 2018, and were subsequently updated in respect of Shared Accommodation and "Build-to-Rent" developments, in 2022 and 2023.

The Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) (hereafter "2025 Apartment Guidelines") set out revised standards for apartment development in relation to matters including apartment mix; internal space standards for different types of apartments; dual aspect ratios; floor to ceiling heights; stair/lift core ratios; storage spaces; and amenity spaces including balconies/patios.



The 2025 Apartment Guidelines constitute Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) and Planning Authorities and An Coimisiún Pleanála are required to have regard to the Guidelines and are also required to comply with any specific planning policy requirements (SPPRs) of the Guidelines. Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of statutory plans.

The 2025 Apartment Guidelines set out SPPRs in relation to the following:

- Unit Mix
- Minimum Floor Areas
- Dual Aspect Ratios
- Floor to Ceiling Heights
- Apartments to Stair/Lift Core Ratios
- Provision of Communal, Community and Cultural Facilities,
- Shared Accommodation / Co-Living Developments
- Purpose Built Student Accommodation,

The 2025 Apartment Guidelines also detail the requirements for the following:

- Minimum overall apartment floor areas,
- Internal space/room width standards
- Storage Spaces
- Private Amenity Spaces including Balconies / Terraces
- Communal Amenity Space

Section 6.2 of the 2025 Apartment Guidelines states that a Building Lifecycle Report shall be submitted with a planning application for apartment development.

5.4.1 Statement of Consistency with the Planning Design Standards for Apartments, Guidelines for Planning Authorities

In accordance with Section 6.2 of the 2025 Apartment Guidelines, a Building Lifecycle Report is submitted as a separate document and as part of this LRD planning application for the proposed development. In addition, a detailed Housing Quality Assessment ("HQA"), is also submitted as a separate standalone document - please refer to both documents. The HQA demonstrates the proposed development's compliance with relevant quantitative standards for new apartment developments as detailed in the 2025 Apartment Guidelines.

The 2025 Apartment Guidelines emphasise the importance of compact growth and state that it is *"necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city and town centres and close to public transport nodes and interchanges"* and that *"this will require a sustained increase in housing output, including apartment type development, in particular at central and accessible locations"*.

The Apartment Guidelines clearly state that the policy and guidance contained within same *"is to be implemented through statutory development plans and in the consideration of individual planning applications"* They also state that *"apartments are most appropriately located within urban areas"*, and as *"outlined in the Sustainable Residential Development and Compact Settlement Guidelines (SRDCSGs) densities should increase in relation to proximity to urban centres and public transport services. In this regard, city and town centres and public transport nodes where high-capacity public transport services are provided (or planned) are particularly suited to higher densities including apartment developments. Other locations close to public transport services, locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, may also be suitable locations for apartments"*.

Taking into account the foregoing, as well as the locational context of the subject site, where the "northern half" of the site is located within 1km walking distance of the existing Luas stop at Fortunestown Lane, and the "southern half" of the site being beyond that distance, as well as the overall site being located c. 0.67km from existing bus stops, the site can be described as both a "High Capacity Public Transport Node or Interchange" and an "Intermediate Location".

The site is therefore considered to be well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and compliant with the above criteria and it is clear that that the proposed development site is suitable for the type of development that includes a high density apartment scheme.

The proposed development consists of 611 no. dwellings, comprised of 306 no. houses and 305 no. duplex units and apartments. There are 155 no. car parking spaces for the proposed 133 no. duplex units (i.e. 1.1 spaces per unit). There are 115 no. car parking spaces for the proposed 172 no. apartments (i.e. 0.6 spaces per unit). Taking into account the foregoing, it is put forward that the proposed car parking for the apartments and duplex units is appropriate.

5.4.2 A summary of the proposed development's compliance with the specific planning policy requirements (SPPRs) of the Apartment Guidelines is detailed in the following sub-sections.

SPPR 1 of the 2025 Apartment Guidelines

SPPR 1 of the Apartment Guidelines states that:

(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.

The Apartment Guidelines note that in relation to housing mix that “unit mix requirements can impact on the viability of apartment schemes and may not support the best outcomes in terms of the number of units delivered, or the particular need within an area”.

Proposed Development's Consistency with SPPR 1 of the 2023 Apartment Guidelines

The overall proposed development of 611 no. dwellings includes a mix of houses, duplex units and apartments comprised of the following mix of dwellings:

- 57 no. 1 bed dwellings,
- 200 no. 2 bed dwellings,
- 321 no. 3 bed dwellings,
- 26 no. 4 bed dwellings
- 7 no. 4/5 bed dwellings.

Table 2 details a breakdown of the proposed residential mix:

Unit Type	1 bed	2 bed / 3 person	2 bed / 4 person	3 bed	4 bed	4 / 5 bed	Total No.	% Mix
Houses	0	0	30	243	26	7	306	50%
Duplexes	11	0	46	76	0	0	133	22%
Apartments	46	1	123	2	0	0	172	28%
Total No.	57	1	199	321	26	7	611	100%
% Mix	9%	1%	31%	54%	4%	1%	100%	

Table 4 – Proposed Dwelling Mix

Whilst SPPR1 provides no limitations on housing mix within a scheme, it is considered that the proposed development provides a good range of unit typologies, in a compact form of high density development that can cater for a range of household formations on the subject site.

SPPR 2 of the 2025 Apartment Guidelines

SPPR 2 of the Apartment Guidelines states that:

"The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- Studio apartment (1 person) 32sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2 bedroom apartment (3 persons) 63 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (4 persons) 76 sq. m
- 3-bedroom apartment (5 persons) 90 sq.m

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing".

Proposed Development's Consistency with SPPR 2 of the 2025 Apartment Guidelines

There are no studio apartment type units included as part of the proposed development.

Each of the proposed 1, 2 and 3 bedroom units either meet or exceed the minimum standards set out under SPPR 2 and this is demonstrated on the enclosed HQA and on the submitted drawings – please refer to same.

We also note that section 3.3 of the Apartment Guidelines requires at least 25% of units within a development shall exceed the minimum sizes set out in SPPR 2 by 10%. Accordingly 125 no. of the proposed 172 no. apartments units equating to c.73% of the proposed units exceed the minimum standard by 10% and this is confirmed in the enclosed HQA.

SPPR 3 of the 2025 Apartment Guidelines

SPPR 3 of the Apartment Guidelines states:

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

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.***
- (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”***

Proposed Development's Consistency with SPPR 3 of the 2025 Apartment Guidelines

Within the proposed apartment Blocks A, B, A1, B1 and C1, there are 172 no. apartments. 94 no. apartments are dual aspect and 1 no. apartment is triple aspect, thus equating to a total of 55% of the units being dual/triple aspect, thus complying with SPPR 3 of the Apartment Guidelines. There are no north facing single aspect units proposed, with all single aspect units being either east/west facing. Details of the aspect of each apartment is set out in the enclosed HQA – please refer to same.

The submitted HQA details which units are considered to be dual / triple aspect and which units are considered to be single aspect. The proposed development is therefore compliant with SPPR 3 of the Apartment Guidelines.

SPPR 4 of the 2023 Apartment Guidelines

SPPR 4 of the Apartment Guidelines states:

“Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

Proposed Development's Consistency with SPPR 4 of the 2025 Apartment Guidelines

As detailed on the relevant, submitted drawings for each individual block prepared by MCORM and Davey+Smith Architects, the proposed development complies with SPPR 4 of the Apartment Guidelines.

SPPR 5 of the 2025 Apartment Guidelines

SPPR 5 of the Apartment Guidelines states:

"There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core."

Proposed Development's Consistency with SPPR 5 of the 2025 Apartment Guidelines

Notwithstanding that there is no particular standard for the number of units proposed per core per block, the maximum number of units served by a single core is 8 no. in Blocks A, B and B1.

The proposed development is compliant with SPPR 5 of the Apartment Guidelines.

SPPR 6 of the 2025 Apartment Guidelines

SPPR 6 of the Apartment Guidelines states:

"The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes."

Proposed Development's Consistency with SPPR 6 of the 2025 Apartment Guidelines

The proposed development provides for a childcare facility and the Applicants have agreed, in principle, to pay a development contribution towards community infrastructure in the area – please refer to section 7.15 in the accompanying Planning Statement for more details. In addition, this application is accompanied by a Social Infrastructure Assessment (SIA) which confirms that there is ample community and social infrastructure in the locality to cater for the proposed development and we refer the reader to same.

SPPR 7 of the 2025 Apartment Guidelines

SPPR 7 of the Apartment Guidelines states:

"There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process."

Proposed Development's Consistency with SPPR 7 of the 2025 Apartment Guidelines

The subject development put forward for permission is a conventional apartment scheme i.e., **it does not propose shared accommodation/co-living**, therefore SPPR 7 of the Apartment Guidelines does not apply to the proposed development.

SPPR 8 of the 2025 Apartment Guidelines

SPPR 8 of the Apartment Guidelines states:

- “(A) (i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes.***
- (ii) The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.***
- (iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.***
- (B) Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme. ”***

Proposed Development's Consistency with SPPR 8 of the 2025 Apartment Guidelines

The subject development put forward for permission is a conventional apartment scheme i.e., **it is not a 'purpose-built student accommodation' scheme**, therefore SPPR 8 of the Apartment Guidelines does not apply to the proposed development.

In addition to the above SPPRs, the 2025 Apartment Guidelines also set out directives in relation various other design recommendations and standards. These are detailed in the following pages along with the proposed development's consistency with same.

Internal Storage:

The Apartment Guidelines set out guidance for internal storage, and standards for same in Appendix 1 of the Apartment Guidelines. i.e.:

- 3 sq.m for studio units;
- 3 sq.m for 1 bed dwellings;
- 5 sq.m for 2 bed / 3 person dwellings,
- 6 sq.m for 2 bed / 4 person dwellings;
- 6 sq.m for 3 bed / 4 person dwellings;
- 9 sq.m for 3 bed / 5 person dwellings.

Proposed Development's Consistency with Internal Storage

All of the residential units are provided with a quantum of internal storage in accordance with the required standards detailed in Appendix 1 of the Apartment Guidelines, as can be seen on the enclosed drawings. Details of same are also set out in the enclosed HQA - please refer to same.

Private Amenity Space

The Apartment Guidelines require private amenity space to be provided in the form of gardens or patios/terraces for ground floor apartments and balconies or terraces at upper levels. Where provided at ground level, private amenity space is to incorporate boundary treatment appropriate to ensure privacy and security. Private amenity space is required to be located to optimise solar orientation and designed to minimise overshadowing and overlooking. Balconies should adjoin and have a functional relationship with the main living areas of the apartment. A minimum depth of 1.5 metres is required for private amenity space, including balconies, in one useable length to meet the minimum floor area requirement under the Guidelines.

The Apartment Guidelines set out standards for private open space in Appendix 1 of the Apartment Guidelines. i.e.:

- 4 sq.m for studio units;
- 5 sq.m for 1 bed dwellings;
- 6 sq.m for 2 bed / 3 person dwellings,
- 7 sq.m for 2 bed / 4 person dwellings;
- 7 sq.m for 3 bed / 4 person dwellings;
- 9 sq.m for 3 bed / 5 person dwellings.

Proposed Development's Consistency with Private Amenity Space

All of the residential units are provided with a quantum of private amenity space in accordance with the required standards detailed in Appendix 1 of the Apartment Guidelines, as can be seen on the enclosed drawings. Details of same are also set out in the enclosed HQA - please refer to same.

Private amenity spaces are generally provided in the form of terraces on the ground floor and balconies/terraces on all the upper floors.

The proposed development has also been subject to a daylight/sunlight/shadow analysis thus ensuring that private amenity spaces are useable and functional and optimise solar gain – please refer to the enclosed assessment by Digital Dimensions for further details. The enclosed landscape plans ensure that appropriate boundary treatments and delineation of public and private open spaces is adhered to.

Communal Amenity Space

The Apartment Guidelines also set out standards for communal open space which is required as follows:

- 4 sq.m for studio units;
- 5 sq.m for 1 bed dwellings;
- 6 sq.m for 2 bed / 3 person dwellings,
- 7 sq.m for 2 bed / 4 person dwellings;
- 7 sq.m for 3 bed / 4 person dwellings;
- 9 sq.m for 3 bed / 5 person dwellings.

Based upon these standards, the communal open space requirement for the proposed development is:

Apartment / Duplex Type	No. of Units Proposed	Required Communal Open Space Per Unit (sq.m)	Total Communal Open Space Required (sq.m)
One Bed Unit	57	5	285
Two Bed (Three Person) Unit	1	6	6
Two Bed (Four Person) Unit	169	7	1,183
Three Bed Unit	78	9	702
Total	305	-	2,176m²

Table 5 – Required Communal Open Space Provision

As detailed in table 3 above, the proposed development has a requirement for the provision of 2,176sq.m. of communal open space. The proposed development puts forward a total provision of 4,750sq.m. and, therefore, complies with the above requirement.

The location and orientation of each communal open space have been carefully considered to maximise use of space and receipt of sunlight and daylight throughout the day. We confirm, for clarity, the above stated communal open space provision is provided for in addition to the proposed private or public open space provisions.

Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.

Children's Play

The Apartment Guidelines states the following in relation to children's play:

"Children's play needs around the apartment building should be catered for:

- Within the private open space associated with individual apartments (see chapter 3);*
- Within small play spaces (about 85-100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- Within play areas (200-400 sq. metres) for older children and young teenagers in a scheme that includes 100 or more apartments with two or more bedrooms."*

The proposed development includes children's play facilities as appropriate, as designed by Gannon & Associates, Landscape Architects. We refer the reader to their enclosed drawings and Landscape Design Rationale for details. There are equipped play areas in close proximity to the apartment buildings designed to encourage imaginative play and social interaction, promoting healthy development in young children. Seating areas, strategically positioned to maximise sunlight exposure, will provide comfortable spaces for relaxation and socialising, fostering a sense of community within the development.

Bicycle Parking and Storage

Section 4.5 of the Apartment Guidelines states that *“accessibility to, and secure storage of, bicycles is a key concern for apartment residents and apartment proposals must respond accordingly to the requirements below in their design and provision of cycle storage facilities. Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather”*. The Apartment Guidelines also states that requirements for the quantity and design of bicycle parking are set out in Section 5.25 (including SPPR 4) of the SRDCSG.

A total of 711 cycle parking spaces will be provided throughout the development, distributed between long-stay and short-stay facilities for residents, the crèche, and visitors.

The breakdown of bicycle parking provision is as follows:

- Residential Long-Stay: 544 spaces
- Residential Short-Stay: 40 spaces
- Crèche Long-Stay: 5 spaces
- Crèche Short-Stay: 15 spaces
- Visitor / General Short-Stay: 107 spaces

This provides a total of 167 short-stay and 544 long-stay spaces, giving a combined total of 711 cycle parking spaces (equivalent to approximately 1.16 spaces per residential unit). All long-stay spaces will be secure, covered, and conveniently located adjacent to residential blocks or within internal storage areas. Short-stay cycle parking will be provided near entrances, communal areas, and the crèche to ensure easy access for visitors and short-duration trips.

Car Parking

Section 4.6 of the Apartment Guidelines note that *“Having regard to the types of location in cities and towns that may be suitable for apartment development, car parking ratios should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.”*.

As previously outlined in this Statement, the “northern half” of the site is located within 1km walking distance of the existing Luas stop at Fortunestown Lane, and the “southern half” of the site being beyond that distance, as well as the overall site being located c. 0.67km from existing bus stops, the site can be described as both a “High Capacity Public Transport Node or Interchange” and an “Intermediate Location”.

The site is therefore considered to be well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and compliant with the above criteria and it is clear that that the proposed development site is suitable for the type of development that includes a high density apartment scheme.

The proposed development consists of 611 no. dwellings, comprised of 306 no. houses and 305 no. duplex units and apartments. There are 155 no. car parking spaces for the proposed 133 no. duplex units (i.e. 1.1 spaces per unit). There are 115 no. car parking spaces for the proposed 172 no. apartments (i.e. 0.6 spaces per unit). Taking into account the foregoing,

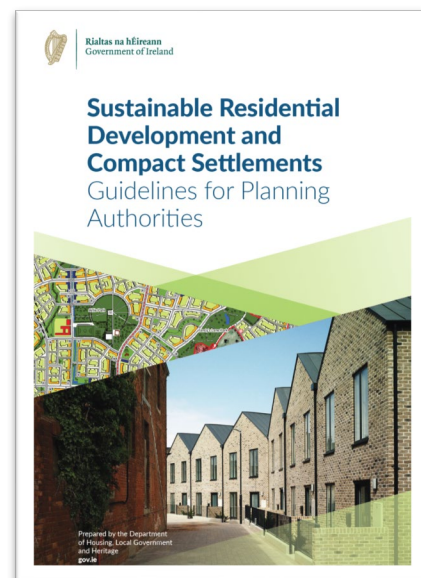
it is put forward that the proposed car parking for the apartments and duplex units is appropriate.

5.4.3 Evaluation of Consistency with the 2025 Apartment Guidelines

Given all the foregoing as set out in Section 5.3 of this Statement, it is respectfully submitted that the development is fully compliant with all the SPPRs and stated criteria of the 2025 Apartment Guidelines. As such, in light of all of the foregoing and having regard to the development's compliance with the SPPRs of the 2025 Apartment Guidelines, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the national policy.

5.5. Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)

5.5.1. Published in January 2024, the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (hereafter "SCS Guidelines") constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended), and to which Planning Authorities and An Bord Pleanála shall have regard to and shall apply any specific planning policy requirements (SPPRs) of the SCS Guidelines, in the performance of their functions. The SCS Guidelines replace the previous Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations.



5.5.2. The SCS Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. The SCS Guidelines are due to be accompanied by a non-statutory Design Manual that will illustrate best practice guidance on how the policies and objectives of the SCS Guidelines can be applied.

5.5.3. The SCS Guidelines are set out in five chapters as follows:

- **Chapter 1 – 'Introduction and Context'** describes the key characteristics of sustainable and compact growth and sets out a summary of Government policy in the areas of spatial planning and housing, climate and sustainable mobility that inform the policy approach.
- **Chapter 2 – 'Implementation'** addresses the interaction of these Guidelines with the plan making and development management processes and with other relevant Section 28 Guidelines.

- **Chapter 3 – ‘Settlement, Place and Density’** sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.
- **Chapter 4 – ‘Quality Design and Place Making’** sets out policy and guidance in relation to quality design and placemaking to be applied in the plan making process and in the assessment of individual planning applications.
- **Chapter 5 - ‘Development Standards’** sets out specific planning policy requirements (SPPRs) in relation to housing standards to be applied in support of greater innovation within the housing sector and to facilitate more compact forms of residential development.

- 5.5.4.** The SCS Guidelines sets out a methodology to assist planning authorities in appropriately integrating national planning policy in relation to residential density into statutory development plans and in the assessment of individual planning applications. The policies and objectives set out in section 3 of the SCS Guidelines are *“intended as a tool to guide the appropriate scale of development at different locations, rather than as a prescriptive methodology”*, with the SCS Guidelines stating that *“flexibility is offered so that planning authorities can operate a plan led approach and take the circumstances of a plan area or a site into account as part of the decision making process prescribed under the Planning and Development Act 2000 (as amended)”*.
- 5.5.5.** Section 2.1.2 of the SCS Guidelines state that *“In accordance with the provisions of Section 34 of the Act when making a decision in relation to an application that includes a residential element or other elements covered by these guidelines, the planning authority is required to have regard to the policies and objectives of the Guidelines and to apply the specific planning policy requirements (SPPRs)”*.
- 5.5.6.** For Dublin, the SCS Guidelines provide density ranges which is broken down into different areas that the subject site can be described as being located in: “City Suburban/Urban Extension”. These areas are described as being: *“Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the twentieth and early twenty first century, while urban extension refers to the greenfield lands at the edge of the built up area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations, and that densities of up to 150 dph (net) shall be open for consideration at accessible urban locations (defined in Table 3.8)”* [an extract of which is shown overleaf].
- 5.5.7.** The SCS Guidelines state (section 3.4.1) that *“While densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations”*. Again, the SCS Guidelines refer to Table 3.8 (see Figure 6 overleaf) which sets out definitions for terms used to define accessibility to allow for consistent application, with the SCS Guidelines noting that *“the characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required”*.

Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Figure 6: Table 3.8 of the SCS Guidelines

- 5.5.8.** Taking into account the locational context of the subject site, where the "northern half" of the site is located within 1km walking distance of the existing Luas stop at Fortunestown Lane, and the "southern half" of the site being beyond that distance, as well as the overall site being located c. 0.67km from existing bus stops, the site can be described as both a "High Capacity Public Transport Node or Interchange" and an "Intermediate Location".

5.5.9. Chapter 3 of the SCS Guidelines include the following policy and objective:

Policy and Objective 3.1

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

Figure 7: Policy and Objective 3.1 of the SCS Guidelines

5.5.10. Chapter 4 of the SCS Guidelines refers to "Quality Design and Quality Placemaking" and refers to the process of design and placemaking and of key indicators of quality design and placemaking. This chapter contains Policy and Objective 4.1 which provides for:

Policy and Objective 4.1

It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.

Figure 8: Policy and Objective 4.1 of the SCS Guidelines

5.5.11. Section 4.4 sets out a number of key indicators of quality design and placemaking, i.e.:

- Sustainable and Efficient Movement
- Mix and Distribution of Uses
- Green and Blue Infrastructure
- Responsive Built Form

5.5.12. The Guidelines promote a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of mixed-use neighbourhoods. The SCS Guidelines state that the following key principles *inter alia* should be applied in the consideration of individual planning applications:

- *In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8) development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility.*

- *It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport.*
- *The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible.*

5.5.13. The SCS Guidelines also state that: “Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces. This is a key element in ensuring the creation of attractive and well-designed settlements”. The Guidelines set out the following key principles that should be applied in the consideration of individual planning applications.

(a) *New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points.*

(b) *New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces).*

(c) *The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible.*

(d) *Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages.*

(e) *New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage.*

(f) *Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable.*

5.5.14. This chapter also contains Policy and Objective 4.2 which provides for:

Policy and Objective 4.2

It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.

Figure 9: Policy and Objective 4.2 of the SCS Guidelines

5.5.15. Statement of Consistency:

The proposed development is within the Metropolitan Area of Dublin City, albeit it on the edge of the urban built up area and, as per these Guidelines, i.e. Tables 3.1 and 3.8, the site can be described as both a "High Capacity Public Transport Node or Interchange" and an "Intermediate Location". The "northern half" of the subject site is currently within a 1km walking distance of existing public transport services, i.e. the Luas. The site is also located in an "Intermediate Location", i.e. the "southern half" as it is currently c.670m walking distance from the nearest bus stop on the N82 Citywest Road to the east.

As per these Guidelines i.e. Table 3.1 of same, the site is considered to be categorised as a "City – Suburban/Urban Extension" site, given its greenfield nature at the edge of the existing built-up area of South Dublin. In accordance with Table 3.1, densities in the range of 40 dph to 80 dph shall be generally be applied at suburban and urban extension locations in Dublin. This is affirmed by the Planning Authority in their previous LRD opinion issued under Ref. LRDOP00224 for the subject proposal which states: *"the Planning Authority agrees that the appropriate density range for this site is between 40 to 80 dwellings per hectare and welcomes the approach of introducing higher density in the northern section of the site outside of the Flood Zones, closet to the LUAS"*. We also note that under the LRD Opinion received by the Planning Authority for this site/proposed LRD (Ref. LRDOP00325) the Planning Authority *"agrees that the appropriate density range for this site is between 40 to 80 uph"*.

We note that the "northern half" of the subject site is located within a 1km walking distance of the nearest Luas passenger stop "Fortunestown" to the north. In light of this and in accordance with Table 3.8 of the Sustainable Residential Development and Compact Settlement Guidelines, 2024, which describes sites that are located close to "High Capacity Public Transport Node or Interchange" and that *"highest densities should be applied at the node or interchange and decrease with distance"*, the highest density of development is positioned in the northern part of the site.

Based on these parameters, the proposed development proposes a net density of 50 dwellings per hectare across the entire site. This aligns with the Sustainable Development and Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare. The southern section of the site (located south of the central wayleave) achieves a net density of 41 dwellings per hectare, offering a sensitive transition to the adjacent low-to-medium density, low-rise housing to the east, while also introducing a more compact residential form.

The northern section of the site (located north of the central wayleave) supports higher density living, delivering 62 dwellings per hectare. Here, apartments and duplexes are strategically placed at the site's northern edge, presenting a strong architectural frontage that capitalizes on proximity to the LUAS Red Line.

In addition, given the proposed street network, accessibility, permeability and connectivity proposed for all users (vehicular / pedestrian / cyclist) ensures good, proximate access to a wide range of services, facilities, employment and educational opportunities, and amenities, and therefore, it is considered that the scale and quantum of development proposed for the subject site achieves compact growth.

It is considered that given the location of the site in close proximity to a number of surrounding services, including existing public transport links, that the proposed density for the subject site is appropriate in this instance, and accords with the guidance set out in Table 3.1 of the Guidelines. The proposed density is also put forward with consideration to the guidance of the NPF, the UD&BHG and the Apartment Guidelines. As previously discussed, a key element of all these documents is to promote compact development in existing urban areas by increasing building heights and densities in order to accelerate housing supply.

The principles of DMURS are also provided for as part of the current proposal as we note that DMURS promotes and encourages four Key Design Principles which are:

1. **Connected networks:** *To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.*
2. **Multi-functions streets:** *The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.*
3. **Modal Hierarchy with Pedestrian focus:** *The quality of the street is measured by the quality of the pedestrian environment.*
4. **Multidisciplinary approach:** *Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.*

The proposed development, its residential and childcare uses, accord with the residential land use zoning objectives attached to it, while the scale of the overall proposed development will blend in seamlessly with its environs.

5.5.16. Chapter 5 of the Guidelines focuses on the design of housing units and the relationship with their immediate surroundings, and sets out four no. SPPRs, which are detailed as follows:

5.5.16.1 Separation Distances:

Section 5.3.1 of the SCS Guidelines states *"Through the careful massing and positioning of blocks, positioning of windows and the integration of open space at multiple levels it is possible to achieve a high standard of residential amenity and good placemaking with separation distances of less than 22 metres. Separation distances should, therefore, be determined based on considerations of privacy and amenity, informed by the layout, design and site characteristics of the specific proposed development"*.

SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms¹⁶ at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

Figure 10: SPPR 1 of the SCS Guidelines

Proposed Development's Consistency with SPPR 1 of the Guidelines:

As indicated on the submitted site layout plans, separation distances of 16m, at a minimum have been applied across the scheme.

5.5.16.2 Private Open Space

SPPR 2 of the Guidelines is:

SPPR 2 - Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

1 bed house	20 sq.m
2 bed house	30 sq.m
3 bed house	40 sq.m
4 bed + house	50 sq.m

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

Figure 11: SPPR 2 of the SCS Guidelines

Proposed Development's Consistency with SPPR 2 of the Guidelines:

The proposed development provides for private open space for the proposed houses in accordance with the standards set out in SPPR2 of the SCS Guidelines, the details of which are provided on the submitted site layout plans and in the HQA – please refer to same.

5.5.16.3 Public Open Space

Whilst not listed as a SPPR, the SCS Guidelines include the following policy and objective regarding Public Open Space:

Policy and Objective 5.1 - Public Open Space

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

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.

Figure 12: Public Open Space requirement of the Guidelines

Statement of Consistency:

The application site is located at the edge of the suburban / built up area of the County. The topography of the site, along with the proposed, extensive retention of existing vegetation of site, such as hedgerow and townland/barony boundaries, creation of necessary biodiversity/ecological buffers and the landscape character of the receiving environs has influenced the design and layout of the proposed development. The proposed landscape design has been successfully married with the surface water drainage proposals with a multilayered approach to the landscape design applied in terms of functionality/play/recreation. Taking all of the aforementioned into account, the proposed development provides for approximately 23,444sq.m (c.2.34 hectares) of open space which equates to c. 12.5% of the gross site area (18.7Ha) or 19% of the net developable area (12.2Ha), and is considered to comply with the policy and objective 5.1 where sites that contain significant heritage or landscape features, a higher proportion of open space may be required. Please also note that the proposed open space does not include areas of the site that are free from development due to environmental / ecological sensitivities. Such areas total c.3.15Ha of the site.

5.5.16.4 Car Parking

Section 5.3.4 of the SCS Guidelines states that in relation to car parking “Car parking ratios should be reduced at all urban locations; and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport”.

SPPR 3 - Car Parking

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

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

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

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

Figure 13 – SPPR 4 of the SCS Guidelines

Proposed Development's Consistency with SPPR 3 of the Guidelines:

Car parking for the proposed development will be provided in the form of surface car parking only. In total, the residential car parking provision is 861 no. spaces, which equates to a ratio of 1.4 spaces per unit, provided for in a mix of on-street and on-curtilage parking.

Further details of the proposed car parking and rationale for the proposed quantum are set out in the enclosed TTA (Section 3.4) prepared by Pinnacle Consulting Engineers – please refer to same.

5.5.16.5 Bicycle Parking and Storage

SPPR 4 of the Guidelines is:

SPPR 4 - Cycle Parking and Storage

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

The following requirements for cycle parking and storage are recommended:

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

Figure 14 - SPPR 5 of the SCS Guidelines

Proposed Development's Consistency with SPPR 4 of the Guidelines:

Regarding bicycle parking provisions for the development, it is considered the proposed 306 no. houses will be capable of accommodating bicycle parking within the curtilage of the property.

A total of 711 no. bicycle parking spaces will be provided for the proposed development will be provided as follows:

Type	No. of Spaces
Bicycle Parking (Resi Long Stay)	544
Bicycle Parking (Non-Resi / Creche Long Stay)	5
Bicycle Parking (Resi Short Stay)	40
Bicycle Parking (Non-Resi / Creche Short Stay)	15
Visitor / General (Short Stay)	107
Total Bicycle Parking	711

Table 6 – Proposed Bicycle Parking

Please refer to the submitted TTA for further details (section 3.5).

5.5.16.6 Operation and Management of the Development

Section 5.3.6 of the Guidelines state that for developments that *"include multi-unit and compact housing blocks, communal facilities such as refuse storage areas should be provided in open spaces that will not be taken in charge. Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required"*.

Statement of Compliance:

This LRD application is accompanied by an Operational Waste Management Plan and a Property Management Strategy Report – please refer to both standalone documents.

5.5.16.7 Daylight

Section 5.3.7 of the Guidelines states that *"the provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents"*.

Statement of Compliance:

Please refer to the enclosed daylight / sunlight assessment which has assessed the apartment units, and areas of open space in accordance with the appropriate BRE Guidance, prepared by Digital Dimensions.

5.5.17 Appendix B – Measuring Residential Density

In accordance with Appendix B of the Guidelines, the following sets out how the net density of the proposed development has been calculated and therefore put forward for permission. We note that Appendix B defines a net density measure as *"a more refined estimate than a gross site density measure and includes only those areas that will be developed for housing and directly associated uses as detailed in Table 1 below"*:

Table 1

Net Site Area Includes	Net Site Area Excludes
<ul style="list-style-type: none"> Local Streets as defined by Section 3.2.1 DMURS. Private and semi-private open space. Car parking, bicycle parking and other storage areas. Local parks such as neighbourhood and pocket parks or squares and plaza's All areas of incidental open space and landscaping. 	<ul style="list-style-type: none"> Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS. Lands used for commercial development (inc. retail, leisure and entertainment). Lands for primary schools, churches and other community services and facilities. Larger, Regional or District Parks, Wayleaves or rights of way. <p>Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

Figure 4 – Copy of Table 1 from Appendix B of the Guidelines

Taking into account the details set out in Table 1 above, in determining what areas of the gross site area of the subject site, i.e. 18.7Ha, can be discounted, in order to calculate both the net developable area and the corresponding net density of the proposed development, the following factors have been discounted:

- Land reserved for a future school - c.1.03 Ha (10,311sq.m),
- Designated flood zone - c.0.69Ha (6,892sq.m),
- Two no. drainage wayleaves traversing the site - c.1.33Ha (13,312sq.m),
- South-western portion above the 120m contour line / steeply sloped part of the site - c.0.49 Ha (4,972sq.m)
- Hedgerow along the western boundary and its 10m buffer zone - c. 0.66Ha (6,581sq.m),
- 10m buffer from the top of the stream bank along the eastern boundary - c. 1.24Ha (12,440sq.m)
- Area occupied by central ditch - c.0.8Ha (8,044sq.m)
- The centrally located north-south "Link Street" c. 0.4Ha (4,024sq.m).
- Total = c.6.45Ha (64,455sq.m)
- Resultant net developable area = c.12.2Ha (122,247sq.m)

The above provides a total of c.6.45 hectares that is undevelopable and can therefore be discounted to calculate the net developable area / net density of development. The net developable area of the subject site is therefore c.12.2 hectares upon which it is proposed to develop 611 no. dwellings, thus producing a net density of 50 units per hectare across the entire site. This aligns with the Sustainable Development and Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare on the subject site.

We note that under the LRD Opinion received by the Planning Authority for this site/proposed LRD (Ref. LRDOP00325) the Planning Authority "agrees that the appropriate density range for this site is between 40 to 80 uph".

5.5.18 Appendix D - Design Checklist - Key Indicators of Quality Urban Design and Placemaking

In accordance with Appendix D of the Guidelines, the following sets out the proposed development's compliance with the design checklist and its key indicators for quality urban design that have been applied to the proposed development. We note that the Guidelines state that some development proposals may perform better against some indicators than others, and "it will be a matter for the planning authority (or An Bord Pleanála in the case of an appeal or direct application) to determine whether the proposal overall is acceptable from a design perspective".

1. Sustainable and Efficient Movement

(i) Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)?

Response:

Yes, the proposed development opens up the subject site to permeability and connectivity, directly connecting the lands with Carrigmore to the north and Corbally to the east in accordance with the Development Plan roads objectives. Priority pedestrian and cyclist access is provided for throughout the development, also affording links to adjoining lands, residential developments and local amenities.

(ii) Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities?

Response:

Yes, in addition to the point above and the creation of new permeability and connections to surrounding lands, the proposed development opens up a significant zoned land bank to the local environs with direct connections available to a variety of local services, education, recreation and public transport etc. in walking distance of the subject site.

(iii) Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users?

Response:

Yes, the site layout plan has been designed in full accordance with the requirements of DMURS. The alignment of open spaces and creation of pedestrian linkages from the proposed development to e.g. Carrigmore and Corbally and beyond allows safe and comfortable pedestrian / cyclist movement through the development.

(iv) Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?

Response:

Yes, the quantum of proposed car parking complies with the CDP requirements for the proposed houses. Reduced car parking to an overall ratio of c.1.4 spaces per unit is afforded to all of the proposed dwellings to encourage more sustainable forms of transport being used. In addition, there is ample bicycle parking accommodated (711 no. spaces), which again promotes sustainable travel.

2. Mix of Land Uses (Vibrant Centres and Communities)

(i) Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling?

Response:

Yes, the land use zoning objective attached to the site allows for the proposed childcare facility. In addition, the scale of proposed non-residential uses will not detract from existing services/facilities in the area but will support the creation of a long-term sustainable community on the site. The site enjoys the benefit of good proximity to essential local services including public transport services.

(ii) Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice?

Response:

Yes, there is a mix of 1, 2 and 3 bedroom apartments and duplex units, along with 2, 3, 4 and 4-5 bedroom houses within the proposed development, comprised of:

Unit Type	1 bed	2 bed / 3 person	2 bed / 4 person	3 bed	4 bed	4 / 5 bed	Total No.	% Mix
Houses	0	0	30	243	26	7	306	c.50%
Duplexes	11	0	46	76	0	0	133	c.22%
Apartments	46	1	123	2	0	0	172	c.28%
Total No.	57	1	199	321	26	7	611	100%
% Mix	9%	1%	32%	53%	4%	1%	100%	-

Table 7: Summary of Proposed Schedule of Residential Accommodation

The proposed dwelling mix is also put forward in consideration of the following objectives of the CDP:

- H1 Objective 12 - *Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:*
 - *there are unique site constraints that would prevent such provision; or*
 - *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
 - *the scheme is a social and / or affordable housing scheme.*

The following should be noted:

The proposed development of 611 no. dwellings includes a total of 321 no. 3 bedroom units (78 no. 3 bed duplex units & apartments and 243 no. 3 bed houses) which equates to c.53% of the overall proposed housing mix. This complies with H1 Objective 12 of the CDP which requires a minimum provision of 30% 3 bedroom units in any new residential development.

We also consider that the proposed housing mix complies with the NPF, which recognises the increasing demand to cater for one and two person households, as a mix of 1 and 2 bed units are proposed i.e. 257 no. in total, equating to c.42% of the overall proposed unit types.

(iii) Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)?

Response:

Yes, the proposed development seeks to redevelop an underutilised, zoned greenfield site, located in close proximity to a wide range of local services and facilities, opening up a strategic landbank to more efficient land uses, that complies with national and local planning policy.

(iv) Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?

Response:

Yes, the subject site is currently in greenfield condition, being the last remaining, large, undeveloped landbank in the previous Fortunestown Local Area Plan area, and abutting long established suburban residential development. The proposed development will provide a significant contribution to the local housing stock, on lands that have been zoned for many years, by also providing significant infrastructure such as the realisation of roads objectives through the lands and completing the residential development of a site that has been identified in the CDP as a Housing Capacity Site.

3. Green and Blue Infrastructure (Open Space, Landscape and Heritage)

(i) Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes?

Response:

Yes. The vast majority of the existing condition of the site is greenfield; however, its land use zoning allows for housing to be developed on it. Cognisance has been paid to the existing hedgerows throughout, as well as topography and the overall landscape characteristics. The project engineers and landscape architects have prepared a comprehensive coordinated plan for the site with nature-based Suds and high quality landscaping incorporated. Considerable retention of existing hedgerows is also proposed as part of the development and has informed the overall site layout plan. A detailed landscape masterplan is submitted with this submission, along with a tree and hedgerow survey – please refer to both, which illustrate that existing trees and planting are to be retained as much as is possible.

(ii) Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles?

Response:

Yes, the site layout plan has been purposefully designed to accommodate an interconnected open space strategy, and this is evident in the landscape masterplan enclosed. The proposed development provides for a Green Spaces network which designed to promote connectivity and access to natural areas, providing recreational and leisure environments for residents. Preserving hedgerows in a landscape plan is crucial as they serve as essential wildlife habitats, provide aesthetic value, and offer practical benefits like windbreaks and erosion control. They contribute to biodiversity, enhance the landscape visual appeal, and ensure a sustainable and harmonious outdoor environment.

Paths and connections have been designed to be ecologically sustainable, incorporating permeable materials and considering the natural flow of the landscape. These elements not only serve functional purposes but also promote accessibility and harmonious integration with the surroundings.

(iii) Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)?

Response:

Yes, all open spaces will be universally accessible with the landscape design catering for a range of recreational activities, as well as play for various age groups. We refer the reader to the enclosed "Site Universal Access Statement" prepared by OHAC which confirms same.

Public open space is defined as areas designed for public use and enjoyment. These areas are intended for free access by the public, include the provision of public amenities such as seating and recreation etc.

(iv) Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?

Response:

Yes, the overall landscape design approach for the subject site aims to

- Prevent flooding by adopting measures tailored to address rainfall characteristics,
- Create an environment that is not only attractive but also serves multiple functions to enhance people's quality of life,
- Foster convenience and biodiversity benefits within the development through the creation of spaces that encourage interaction with nature, preserving local fauna and flora,
- Implementing measures to prevent and treat pollution, ensuring the availability of clean water and contributing to the overall protection of water resources,
- Achieving this through the proper design and management of Sustainable Urban Drainage Systems (SUDS), promoting an environment conducive to species diversity.

A variety of SuDS proposals are proposed as part of the overall drainage strategy, the details of which are set out in the enclosed engineering drawings / documentation.

4. Responsive Built Form

(i) Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?

Response:

Yes, the layout has been integrated with the established varied development patterns of the area and provides for numerous connections to the wider community, built form, density and green infrastructure. Within these parameters, the creation of active street frontages is achieved by designing a highly permeable layout which promotes passive surveillance and prioritises use by pedestrians and cyclists.

The use of different treatments and typologies proposed within each character area creates distinctive areas within the scheme adding vibrancy and strong visual interest to the proposed scheme creating a sense of place for this new neighbourhood.

An ordered series of urban residential cells is proposed across the scheme connected by a hierarchy of streets and related open spaces. The new street network is legible and easy to navigate. It promotes permeability throughout the scheme itself and also provides easy connections to the neighbouring housing development areas, parks and local services.

(ii) Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface?

Response:

Yes, the site layout plan and landscape design (both hard and soft landscaping) ensure there is a clear delineation of public, communal and private spaces. All public / communal spaces are overlooked, thus ensuring passive supervision.

(iii) Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent?

Response:

Yes. The receiving environs are categorized by semi-rural land, long established suburban housing and more modern development in the form of higher density housing to the north, on the Fortunestown LAP lands, as well as local non-residential uses/services in the form of schools, shopping centre and Luas being delivered over the last 15-20 years. The proposed development is considered to be on par with same, thus ensuring it will successfully assimilate into the receiving environs.

(iv) Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?

Response:

Yes. Five distinct character areas are proposed across the entire scheme. Each of the character areas has been designed to have their own identity and will be visually different to neighbouring areas in a number of aspects. Building typology, materials and finishes, individual unit design and proportion and open space design are all used to develop an individual sense of place for each separate character area that responds to the local site conditions and topography.

The proposed development is bisected by the proposed north-south link street and access to each of the character areas is provided off this main link street. As people walk through the residential streets, they will experience changes in the architectural environment, from one area to the next, providing a dynamic and engaging experience.

Along the main north-south link road, the building heights begin with 3 storey typologies. These mid-rise buildings create a strong, defined edge along the street, helping to establish a sense of enclosure and giving the area a prominent architectural presence. As one moves away from the link road, the building heights gradually decrease, transitioning to two-story semi-detached and terraced houses on the east and west sides of the site. These lower-density housing clusters are in keeping with the surrounding building typologies, ensuring a smooth transition from the higher-density core of the development to the more suburban and rural areas, particularly as the site

gradually merges with agricultural and amenity lands to the west.

In the northern part of the site, 4 to 5-storey apartment blocks are introduced, providing a higher density of living spaces. These taller buildings are strategically placed in the lowest part of the site, where their scale is better suited to the topography. These apartment blocks act as a clear urban edge to the LAP lands to the north, while their consistent architectural style and materials help maintain cohesion with the rest of the development. The design of these apartment blocks also incorporates features that enhance surveillance, allowing residents to overlook the western and eastern site boundaries, the future school site, and the northern public open space, fostering a sense of safety and community interaction.

The integration of traditional and contemporary architectural elements aims to create a cohesive streetscape that respects and follows the existing development pattern of the adjoining estates to the north while enhancing land-use efficiency and relationship with inner public open spaces and the wider community.

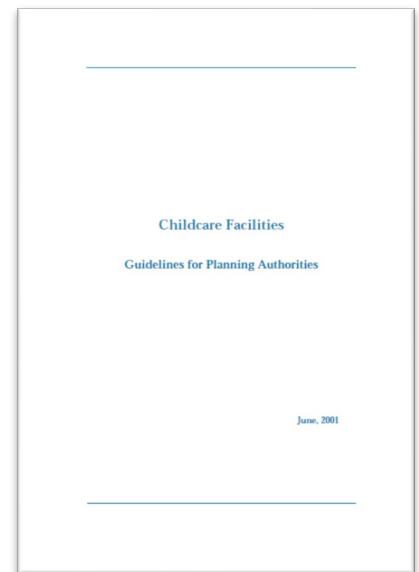
5.5.19 Evaluation of Consistency with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024

Given all the foregoing as set out in Section 5.5 of this Statement, it is respectfully submitted that the development is fully compliant with the stated criteria of the 2024 Guidelines. As such, in light of all of the foregoing, and having regard to the development's compliance with the SPPIRs and standards of the Guidelines, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended national policy.

5.6. **Childcare Facilities – Guidelines for Planning Authorities (2001)**

The Childcare Facilities Guidelines for Planning Authorities (2001) (hereafter “2001 Guidelines”) refer to a benchmark provision of one new childcare facility, catering for 20 no. childcare places, for every 75 no. new dwellings developed.

The 2001 Guidelines also provide broader guidance on internal space standards for childcare facilities, applying a minimum floor space per child of 2.32 sq.m, exclusive of kitchen, bathroom and hall, furniture, or permanent fixtures.



5.6.1 **Statement of Consistency with the 2001 Guidelines**

The proposed development consists of 611 no. dwellings, comprised of 306 no. houses and 305 duplexes and apartments. In total, the proposed development comprises of 57 one beds, 200 two beds, 321 three beds and 31 four/four-five bed dwellings, in a mix of houses, duplexes and apartments.

It is noted section 4.7 of the Apartment Guidelines states, in relation to childcare facilities: *“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”*.

Based on the proposed development of 611 no. residential dwellings and the requirements of the “Childcare Facilities Guidelines for Planning Authorities” (2001), which state provision should be made in new developments for 20 no. childcare places for every 75 no. dwellings, the proposed development would have a requirement to provide for a childcare facility catering for 163 no. childcare places. It is noted; however, that section 4.7 of the Apartment Guidelines states, in relation to childcare facilities: *“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”*. The proposed development includes 57 no. one bed units.

Discounting the 57 no. proposed one bed units, the proposed development caters for 554 no. dwellings for the purposes of assessing the childcare requirements and based on the provision of 20 no. childcare places for every 75 no. dwellings, the development therefore has a requirement to provide for a childcare facility catering for 148 no. childcare places.

The proposed childcare facility has been designed to be of a size capable of catering for 148 no. childcare places. The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard, a childcare facility to serve the proposed development and meeting the requirement for c. 148 childcare spaces would need to be a minimum of c. 343sq.m net floor area.

The location of the childcare facility within the layout has sought to ensure the facility is centrally located within the scheme and easily accessible to all residents. Two dedicated areas of associated outdoor play space for the have also been provided for totalling c.314.2sq.m.

The proposed floor area of the crèche i.e. 630sq.m therefore exceeds the minimum requirement as set out in the 2001 Childcare Facilities – Guidelines for Planning Authorities by c.286sq.m, and includes sufficient additional floorspace to accommodate toilets, sleep room, reception, staff area, circulation and escape route spaces, furniture and permanent fixtures as required, and can adequately cater for the required 148no. childcare spaces.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs (as identified in Section 4.2 of the submitted Social Infrastructure Assessment), it is put forward that the proposed creche is of an appropriate size and scale to cater for the proposed development.

Given all the foregoing, it is respectfully submitted the proposed development caters for the appropriate provision of childcare place and is compliant with the 2001 “Childcare Facilities Guidelines for Planning Authorities”.

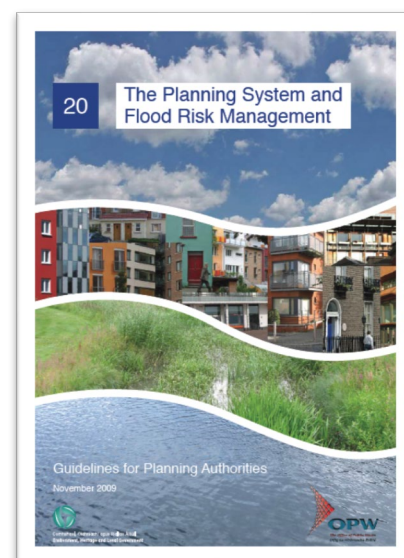
5.7. **The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).**

The Planning System and Flood Risk Management – Guidelines for Planning Authorities, 2009, (hereafter “the FRMG”) provide detailed guidance on the role that flood risk should play at different levels of the planning system. Planning authorities must implement the FRMG to ensure that, where relevant, flood risk is a key consideration in development plans and local area plans and in the assessment of planning applications. The FRMG should also be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

The FRMG introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process and set out the following core objectives:

- Avoid inappropriate development in areas at risk of flooding,
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off,
- Ensure effective management of residual risks for development permitted in floodplains,
- Avoid unnecessary restriction of national, regional, or local economic and social growth,
- Improve the understanding of flood risk among relevant stakeholders; and,
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

Chapter 2 of the FRMG identify types and causes of flooding, details on flood risk, the stages of flood risk assessment and flood zones, while chapter 3 sets out the principle actions when considering flood risk management, including the sequential approach, justification test, and



chapter 5 provides guidance on flooding and the development management process including the application of the justification test in assessing a planning application.

5.7.1 Statement of Consistency with the FRMG

A site specific flood risk assessment (hereafter SSFRA) has been undertaken by Kilgallen & Partners, as referred to above, and is enclosed – please refer to the SSFRA for specific details of the flood risk assessment undertaken. The following is a synopsis of same only – for full details please refer to the submitted SSFRA.

The SSFRA identified the various flood risk mechanisms that could affect the Site and searched for evidence of flood risk arising from each mechanism. This search was based on:

- interrogation of available datasets for evidence of flood risk arising;
- examination of relevant details of the proposed development;
- inspection of the site.

This process found evidence of flood risk at the Site from fluvial sources (i.e. from the overtopping of rivers and streams, in this case the Corbally Stream which flows along the eastern and northern perimeters of the Site). No evidence of flood risk at the Site was found for other flood risk mechanisms.

For a site affected by fluvial flood risk, there are the following concerns:

- development of that site might give rise to flood risk elsewhere.
- development of that site might be at risk of flooding;

Regarding the first concern, the proposed development was found to have the potential to displace fluvial floodplain storage, thereby increasing flood-risk elsewhere. To prevent this, the proposed development includes compensatory storage, designed in accordance with the Guidelines, to offset the displaced floodplain storage. Modelling of flood flows in the stream during extreme events found the proposed development will not increase peak water levels during extreme flood events and will not increase flood risk elsewhere.

Regarding the second concern, the finished levels of the proposed development that are considered to be water-vulnerable, i.e. buildings, roads, parking areas, footways cycleways and other paved areas were found to lie outside flood risk zones in the post-development scenario and so the proposed development is not considered to be at risk of flooding. The freeboard between the potential top water level of the 1% AEP flood event and the lowest proposed site road or floor level far exceeds the minimum recommended dimensions as set out in the Guidelines. Furthermore, the freeboard above the highest potential top water level and the vehicle/pedestrian access points into Carrigmore/Carrigmore Park is significantly greater than those recommended in the Guidelines and therefore there will be no impact on the ability to enter/leave the site during the extreme 1% AEP event (i.e. 1 in 100 p event).

The assessment carried out by Kilgallen and Partners informed the design of the proposed development so as to avoid any potential of flooding. In addition, the layout of the open space to the northern end of the development has been designed to cater for potential extreme rainfall events and then revert to usable open space during normal weather conditions. The SSFRA included appropriate factors to allow for the potential impact of climate change.



The Flood Risk Management Guidelines require the appropriateness of proposals to develop lands at risk of flooding to be assessed using the Development Management Justification Test. Accordingly, the proposed development was subject to and was found to satisfy the various criteria of this test.

The submitted SSFRA concludes (section 12) that the SSFRA was carried out in accordance with the document 'Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)'. It also confirms that "for an inland Site of this nature and for which there are no existing flood defence mechanisms that could affect flood risk at the Site, the potential flood risk mechanisms are Fluvial, Pluvial and Groundwater.

Initial assessment of existing flood risk indicators indicate the Site is not at risk from either Pluvial or Groundwater flooding.

Initial assessment of flood risk indicators suggest the Site could be at risk from Fluvial Flooding. Accordingly, a detailed assessment of fluvial flood risk was carried out. This detailed assessment confirmed that the Site is affected by flood risk zones A & B at its northern boundary.

The proposed development includes a basin at the northwest corner of the Site which is designed to provide direct compensatory storage. The inclusion of this basin means that while the proposed development will impact on existing flood risk zones at some locations (Section 5.1) and thus displace floodplain storage, it reduces the ground level at other locations, thereby providing compensatory storage. Cumulatively, more floodplain storage will be available upon completion of the proposed development than is currently available, leading to a slight reduction on flood risk elsewhere, in the areas immediately surrounding the Site.

The proposed development includes stream crossings at the locations shown on Figure 5.7. A preliminary design for each structure has been carried out in accordance with OPW requirements. Soffit levels are at least 500mm above the 1% AEP level at all crossings and so comfortably exceed OPW requirements. Two of the crossings are vehicular and crossing levels are constrained by the requirement to tie-in to existing road levels. OPW Section 50 consent have been obtained for these crossings; a copy of the consents is included in Appendix E.

The Flood Risk Management Guidelines recommend that floor levels be kept above the 1.0% AEP flood level with an appropriate allowance for freeboard, typically 0.5m. The maximum post-development 1% AEP water level in the basin at the north boundary is 118.10m. The minimum proposed floor level is 120.50m, 2.40m above the 1% AEP level and 1.90m above the recommended minimum. This SSFRA also recommends that road levels should be kept a minimum 250mm above the 100year flood level. The minimum proposed road level is 120.00m, 1.90m above the 1% AEP level and 1.65m above the recommended minimum.

As described in Section 5.4, the finished level of the open space adjacent to the Corbally stream has been raised where required to provide a minimum 750mm freeboard above the 1% AEP water level in the stream.

The proposed development was subject to and passed the Development Management Justification Test.

The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective".

It should also be noted that a similar SSFRA and compensatory measures were proposed in the SSFRA submitted with the previous SHD planning application on the subject site (Ref. ABP-313145-22), and we note that the Planning Authority indicated no objection in respect of surface water and flood risk, subject to conditions. In her assessment of that SHD, we note that the An Bord Pleanála Inspector stated that *"I am satisfied that the layout of the development is broadly cognisant of fluvial flood risk, however, elements of the proposed development at the northern boundary encroach on the flood risk zones, which creates the potential for the proposed development to displace floodplain storage and thereby increase flood risk elsewhere. In order to prevent this, the development includes compensatory storage within the site, which is in accordance with the Flood Risk Management Guidelines (FRMG). The SFRA considers that the compensatory storage exceeds the potential floodplain storage being displaced and so the proposed development will lead to a slight reduction in flood risk elsewhere".* She concluded: *"The report from the Environmental Services Department has no objection in respect of Flood Risk subject to conditions. I am generally satisfied that the with the details of the SFRA, and subject to condition the development will not result in a flood risk".*

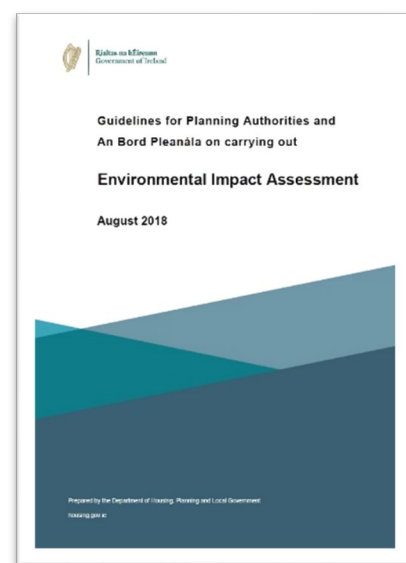
Taking all of the foregoing into consideration, it is respectfully put forward that the submitted SSFRA undertaken for the current development proposal confirms that the proposed development is appropriate from a flood risk perspective. The submitted SSFRA is similar to that accepted in the most recent SHD planning application and it is therefore put forward that this also addresses the previous concerns in relation to flooding on the subject site.

In accordance with the Flood Risk Management Guidelines, the proposed development is therefore appropriate from a flood risk perspective.

5.8. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)

These Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, (hereafter "the EIA Guidelines") were issued under Section 28 of the Planning and Development Act 2000, as amended ("Act of 2000").

The EIA Guidelines provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities. Both An Bord Pleanála and the relevant local authority are required to have regard to the EIA Guidelines in the performance of their functions under the Act of 2000.



5.8.1 Statement of Consistency with the EIA Guidelines

The proposed development is comprised of 611 no. dwellings, a childcare facility and all associated site development works etc. Therefore, an Environmental Impact Assessment Report (EIAR) is required under Part 2(10) (b) of the Planning and Development Regulations 2001 (as amended), as the development is above the threshold for the requirement of same. Accordingly, an Environmental Impact Assessment Report (EIAR), has been prepared and forms part of this application for permission for the proposed LRD. Please refer to the enclosed EIAR and Non-Technical Summary of same, which has been prepared by the relevant competent experts to ensure the protection of the environment and the provision of appropriate mitigation measures where necessary.

NOTE:

The following sections 5.9 to 5.14 provide details of other relevant planning guidance documents (that are not Section 28 Ministerial Guidelines) to which the development has had regard to / complies with).

5.9 Quality Housing for Sustainable Communities – Best Practice Guidelines (2007)

The Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007, (hereafter “the Guidelines”) are the Department's policy statement for delivering homes and sustaining communities.

The Guidelines provide the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.

The Guidelines promote quality sustainable residential development in urban areas having regard to the following:

- *promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes,*
- *encourage best use of building land and optimal of services and infrastructure in the provision of new housing,*
- *point the way to cost effective options for housing design that go beyond minimum codes and standards,*
- *promote higher standards of environmental performance and durability in housing construction,*
- *seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible, and visually attractive environment; and,*
- *provide homes and communities that may be easily managed and maintained.*



5.9.1 Statement of Consistency with Quality Housing for Sustainable Communities – Best Practice Guidelines

Table 8 below and overleaf details the 7 no. essential requirements for new residential developments detailed in the Guidelines, along with the development's consistency with same.

Requirement	Statement of Consistency
1. Socially & Environment Appropriate <i>"The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</i>	<p>The proposed development provides for a wide mix of one, two, three, four and four/five bedroom dwellings, in a range of houses and apartment / duplex unit typologies, thus catering for a variety of household formations and needs. All proposed dwellings are of an ample size to allow for ease of internal adaption should resident's requirements change over the course of their life cycle.</p> <p>The development will also include for the appropriate provision of social and affordable housing, "pepper-potted" throughout the development to support social sustainability.</p> <p>The development includes for a childcare facility to support the expected demand generated by future residents.</p> <p>The development caters for an ample provision of public open space which is central to the design of the proposed layout. The public open space provision for the development is useable and accessible and provides for a variety of landscaping treatments to promote a range of recreational uses. All dwellings are situated within a short walking distance of public open space, with the siting of dwellings within the development also ensuring areas of public open space are passively supervised for an enhanced sense of safety.</p> <p>Children's play facilities are proposed throughout the development in an appropriate manner.</p> <p>In addition, an ample provision of communal amenity space is provided, generally associated with the proposed apartment / duplex units, to further enhance recreational use within the development and promotes areas for social mixing.</p>

<p>2. Architecturally Appropriate</p> <p><i>"The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage."</i></p>	<p>The design and layout of the development is considered to create a liveable and visually pleasing residential environment. All proposed houses are two or three storeys in height, with duplex and apartment buildings ranging from 3 to 5 storeys, with areas of public open space appropriately varied and defined, to ensure the development is legible and human in scale for future residents. The design is appropriate and mindful of its locational context and site constraints. All proposed dwellings / buildings will be finished using high-quality materials and are designed to complement the existing architectural style and palette of materials in the vicinity.</p>
<p>3. Accessible & Adaptable</p> <p><i>"There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime."</i></p>	<p>The design of the proposed dwellings has been carried out in accordance with the requirements of the Building Regulations (including Part M re: accessibility). A Universal Design/Access Statement and a Site Universal Access Statement are included with this LRD planning application. Careful consideration has been paid to the topography of the site to ensure all dwellings/uses are directly accessible from the street.</p> <p>All proposed dwellings are of an ample size to allow for ease of internal adaption should resident's requirements change over the course of their life cycle.</p>
<p>4. Safe, Secure & Healthy</p> <p><i>"The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives."</i></p>	<p>It is considered the proposed development provides good segregation of vehicle and pedestrians/cyclists, with the latter users being given priority throughout the entire development, promoting a safe walking and cycling environment for future residents / visitors as well as existing residents in the area through the provision of strong linkages improving connections to the wider area.</p> <p>Road proposals for the development have been prepared by Pinnacle Consulting Engineers and are submitted as part of this planning application. As detailed within the road engineering drawings and the Traffic and Transport Assessment, the proposed road</p>

	<p>network has been designed with regard to the principles of DMURS, ensuring safe vehicular movement within the development.</p> <p>Public open space areas are passively surveyed/supervised by proposed dwellings/buildings for enhanced sense of safety and will be well-lit as far as practically possible.</p>
5. Affordable <p><i>"The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development."</i></p>	<p>The proposed development will be built, managed and maintained at reasonable cost. All areas within the development proposed to be taken-in-charge by the local authority are designed, and will be constructed, to South Dublin County Council's taking-in-charge standards. Areas within the development not proposed to be taken-in-charge will be managed by a future estate management company which will be established prior to occupation of the development. In relation to same, a Building Life Cycle Report, including for measures to reduce costs for future residents, is submitted as part of this application for permission. The final taking-in-charge plan will be agreed with the local authority upon receipt of a grant of permission and prior to commencement of future development works.</p>
6. Durable <p><i>"The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works".</i></p>	<p>The proposed development endeavours to use the best available high-quality materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the development.</p>
7. Resource Efficient <p><i>"Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction,</i></p>	<p>The proposed development is considered to accord with the aforementioned sustainable development principles.</p> <p>The proposed density is put forward with regard to: (a) the existing pattern of development in the area, (b) the characteristics of the site itself, including topography, (c) the guidance of the Sustainable Residential Development & Compact Settlements Guidelines (2024) in relation to density, and (d) access/proximity to existing public transport. It is considered</p>

<p><i>maintenance and management of the dwellings should be minimised."</i></p>	<p>proposed development achieves an appropriate level of density, taking into account the existing context and constraints of the site.</p> <p>The future population of the development will be supported through the provision of additional linkages and connectivity to public transportation routes.</p> <p>All proposed dwellings / buildings are designed and will be constructed to the most up-to-date Building Regulations standards, with proposed material finishes to be of a robust, durable, nature to ensure energy-efficiency, promote minimal maintenance and upkeep requirements, and mitigate against the effects of climate change. A Building Life Cycle Report is submitted as part of this application for permission and demonstrates how apartment / duplex units will adapt to changing life cycles and tenures.</p> <p>The proposed layout has carefully considered the topography and orientation of the site, with all proposed dwellings/ buildings designed and sited to ensure they, along with all public, communal and private amenity spaces, receive the benefit of maximum solar gain and natural light.</p>
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Table 8: Consistency with the Quality Housing for Sustainable Communities – Design Guidelines.

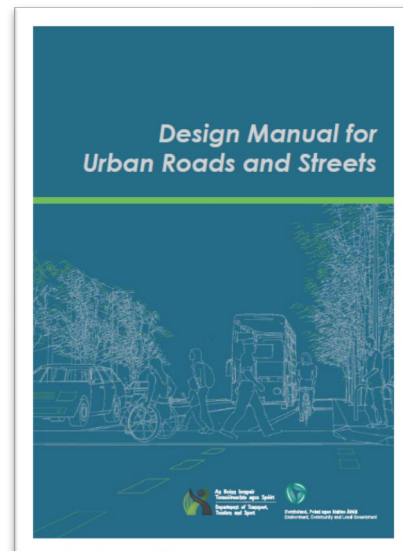
5.9.2 Evaluation of Consistency with the Quality Housing for Sustainable Communities – Best Practice Guidelines

Given all the foregoing as set out in this Statement, it is respectfully submitted the proposed development is fully compliant with the requirements of the Quality Housing for Sustainable Communities – Best Practice Guidelines, and as such, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended national policy.

5.10 Design Manual for Urban Roads and Streets (DMURS), (2019)

The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013, with an updated version released in May 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

DMURS outlines 4 no. design principles for new developments, which are addressed in Table 7 overleaf. Please also note that Pinnacle Consulting Engineers have prepared the submitted DMURS Statement of Compliance which confirms that the design process for the proposed development has been a collaborative and consultative process involving architects, engineers, and landscape architects. The outcome is a safer environment for pedestrians, cyclists and drivers alike. Added value and improvements in quality of life will be achieved through implementation of this integrated and progressive approach. The submitted DMURS Statement of Compliance concludes: *"It is, therefore, concluded that the proposed development is compliant with the design principles outlined in the Design Manual for Urban Roads and Streets"*.



5.10.1 Statement of Consistency with DMURS

Design Principle 1 - Connected Networks: *"To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport."*

Statement of Consistency:

The proposed road network has been designed with regard to the principles of DMURS, ensuring safe and easily navigable routes for vehicles within the development, with pedestrians / cyclists given priority. The proposed development caters for the delivery of the north-south and east-west roads objectives on the site as set out in the County Development Plan.

The future population of the development will be supported through the provision of additional linkages and connectivity to public transportation routes. It is fully considered the proposed layout and design ensure a permeable and legible development for all users.

Design Principle 2 – Multi-Functional Streets: *"The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment."*

Statement of Consistency:

As detailed in the submitted road drawings and Traffic and Transport Assessment prepared by Pinnacle Consulting Engineers, the proposed layout has taken care to provide for a definite hierarchy of streets, which prioritise pedestrian movement throughout the development. Given the scale of the development site, the proposed layout has also been carefully designed to

create a sense of place and definition in the various character areas. Furthermore, the proposed layout ensures all areas of open spaces and pedestrian routes are actively and passively overlooked to promote a strong sense of safety and creating a self-regulating environment.

Design Principle 3 – Pedestrian Priority: *“The quality of the street is measured by the quality of the pedestrian environment.”*

Statement of Consistency:

Pedestrian priority is of the utmost importance within the proposed development. The proposed development has been designed for ease of access throughout the scheme, in accordance with Part M of the Building Regulations, with new accesses / connections provided to existing development adjoining the site, where appropriate.

Public open space areas are passively surveyed by proposed dwellings/buildings for enhanced sense of safety for pedestrians. In addition, the proposed road network has been designed with regard to the principles of DMURS, ensuring safe vehicular movement within the development and thus safe movement of pedestrians / cyclists.

Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points and to access the existing network of pedestrian, cycle, and public transport facilities in the environs.

Design Principle 4 – Multi-Disciplinary Approach: *“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”*

Statement of Consistency:

The design of the proposed development results from a multi-disciplinary plan-led approach through the co-operation of planners, architects, engineers, landscape architects, ecologists etc.

Table 7: Consistency with DMURS

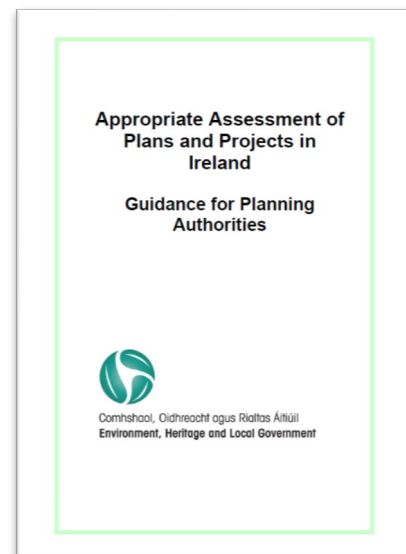
5.10.2 Evaluation of Consistency with DMURS

Given all the foregoing as set out in Section 5.10 of this Statement, it is respectfully submitted the proposed development is fully compliant with the design principles contained within the DMURS document. As such, in light of all of the foregoing, and having regard to the development's compliance with DMURS, as further reinforced in the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers and submitted as a separate document, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended national policy.

5.11 Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009).

The Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009, (hereafter “the AA Guidelines”) were prepared jointly by the NPWS and Planning Divisions of DECLG. The AA Guidelines set out the different steps and stages needed in establishing whether a plan or project can be implemented without damaging a Natura 2000 site.

The AA Guidelines indicate the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts. The AA Guidelines address issues of mitigation and avoidance of impacts, and also the Article 6.4 derogation provisions in circumstances in which there are no alternatives and there are imperative reasons of overriding public interest requiring a plan or project to proceed.



5.11.1 Statement of Consistency with the AA Guidelines

An Appropriate Assessment (AA) Screening Report has been prepared by Scott Cawley Consulting Ecologists for the proposed LRD on the subject site and is enclosed as a separate standalone document to which we refer the reader for full details.

The enclosed AA Screening Report has assessed the impact of the proposed development on the following Qualifying Interest (QI) habitats and/or the QI/Special Conservation Interest (SCI) species of a European site(s):

- Glenasmole Valley SAC (001209),
- Wicklow Mountains SAC (002122),
- Wicklow Mountains SPA (004040),
- Rye Water Valley/Carton SAC (001398),
- Red Bog, Kildare SAC (000397),
- Poulaphouca Reservoir SPA (004063),
- South Dublin Bay SAC (000210),
- South Dublin Bay and River Tolka Estuary SPA (004024),
- North Bull Island SPA (004006),
- North Dublin Bay SAC (000206),
- North-west Irish Sea SPA (004236),
- Rockabill to Dalkey Islands SAC (003000),

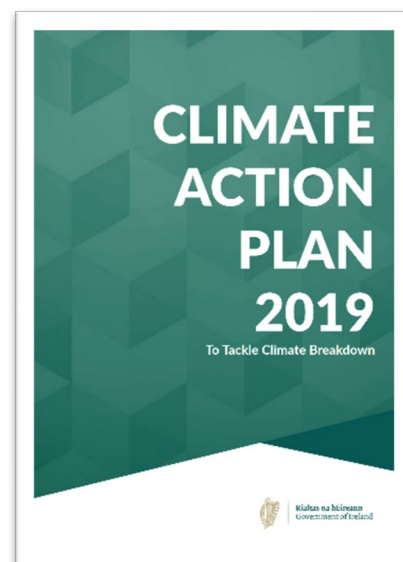
- Baldoyle Bay SPA (004016),
- Malahide Estuary SPA (004025),
- Rogerstown Estuary SPA (004015).

The submitted AA Screening Report concludes that *“Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded”* and that *“In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered. Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)”*.

5.12. Climate Action Plan 2019

The Climate Action Plan, 2019, seeks to make Ireland a leader in responding to climate change and disruption, in order to minimise the impact of climate change and build resilience in the face of the challenge. The Action Plan notes that the built environment accounted for 12.7% of Ireland's greenhouse gas emissions in 2017 and it is therefore important we improve the energy efficiency of our buildings. Ireland's dispersed settlement pattern and low population density are identified as challenges specific to Ireland that need to be addressed reduce transport emissions. The Action Plan includes the following objectives:

- Increase reliance on, and the capacity of, renewables energies,
- Increase attention to energy and carbon ratings in the construction and management of new development,
- Encourage modal shifts to sustainable transport forms and make growth less transport intensive through better planning to ensure new development is less dependent on road capacity nor car parking requirements,
- Increase densities in appropriate locations through the provision of more multi-storey and terraced buildings, which require less energy and ultimately reduce travel distances,
- A target of 55% renewable power and at least 500,000 electric vehicles on the road by 2030.



5.12.1 Evaluation of Consistency with the Climate Action Plan 2019

The proposed medium to high density residential development will provide housing adjacent to existing built-up residential areas in South Dublin and proximate to existing public transport services. The future population of the proposed development will support existing bus and Luas services and facilities in the vicinity, making them more viable and thus helping reduce greenhouse gas emissions from transport and help Ireland to achieve climate targets. The proposed development has been designed to retain existing trees and vegetation, as much

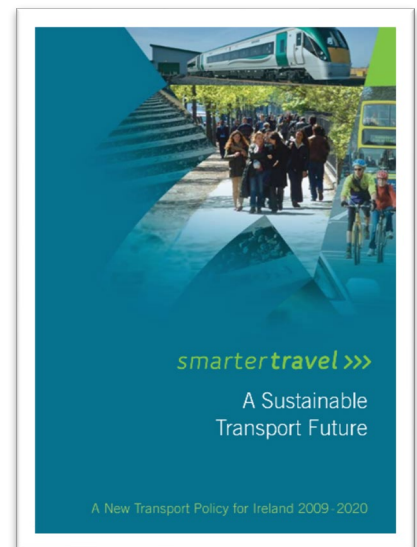
as feasibility possible, creation of biodiversity / ecological buffers free from development, and includes for new native planting to supplement any loss which will add biodiversity in the area and will help with the decarbonisation of the environment. An ample provision of public open space is also provided as part of the proposed development.

Car parking within the proposed development has been minimised to encourage modal shifts to more sustainable forms of transport, with pedestrian and cyclist permeability and an ample provision of bicycle parking promoted / provided throughout the development. This will encourage and enable the movement to a more sustainable mode of transport.

5.13. Smarter Travel – A New Transport Policy for Ireland (2009-2020)

The Smarter Travel – A New Transport Policy for Ireland document was published by the Government in 2009 to address, and reverse, unsustainable transport, and travel trends in the country. The document targets the following key areas:

- Encourage future growth in compact forms, to support sustainable travel and discourage dispersed development and long commutes.
- Reduce work-related commuting by car to under 50% modal share and encourage changes in personal travel behaviour.



5.13.1 Evaluation of Consistency with Smarter Travel – A New Transport Policy for Ireland

The proposed development accords with the overall vision for better integration between land-use and transport. The proposed residential development for a medium to high density residential development located proximate to existing local neighbourhood facilities and public transport routes/services. The proposed development will be well serviced by public transport and proposes to provide appropriate linkages and connectivity to existing bus and Luas stops.

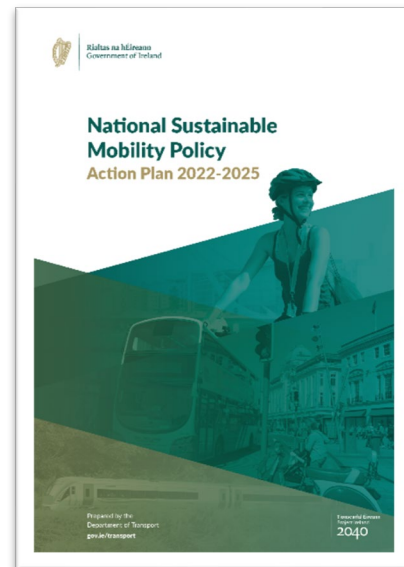
The proposed development has also been designed to provide pedestrian / cyclist permeability a priority, making walking / cycling a more attractive and viable form of transport. The provision of car parking within the proposed development has been kept to a minimum. The overall car parking ratio is c.1.4 spaces per residential unit. This will encourage both future residents and visitors to leave their cars behind and seek other, more sustainable, transport means.

The subject site is also readily accessible by public transport and cycling from a range of employment hubs in the area and, as such, the proposed development is considered to be situated in a sustainable location and in accordance with the compact development aims of this document.

5.14. National Sustainable Mobility Policy (2022 – 2025)

The National Sustainable Mobility Policy (hereafter “SMP”) was published in April 2022. The SMP sets out a strategic framework to the year 2030 for active travel and public transport to support Ireland's requirements to achieve a 51% reduction in carbon emissions by the end of this decade.

The SMP includes for three principles and ten goals to support behavioural change through a wide range of interventions including, inter alia: public transport infrastructure and services, active travel promotion and supports, road safety initiatives, legislative measures, research, and public engagement.



5.14.1 Evaluation of Consistency with the SMP

Table 8 details the principles and goals of the SMP along with the proposed development's consistency with same.

Principle / Goal	Statement of Consistency
Principle 1: Safe and Green Mobility Goal 1: Improve mobility safety. Goal 2: Decarbonise public transport. Goal 3: Expand availability of sustainable mobility in metropolitan areas. Goal 4: Expand availability of sustainable mobility in regional and rural areas. Goal 5: Encourage people to choose sustainable mobility over the private car.	<p>The proposed road network has been designed with regard to the principles of DMURS, ensuring safe and easily navigable routes for vehicles within the development, with pedestrians / cyclists given priority.</p> <p>Pedestrian / cyclist permeability has been a key consideration in the design of the proposed development. All pedestrian / cycle paths, both formal and informal, are designed to follow anticipated desire lines and allow for ease of movement and legibility. The siting of proposed dwellings / buildings within the development ensures these routes are passively overlooked to provide safe, attractive routes throughout the development.</p> <p>The future population of the development will be supported through the provision of additional linkages and connectivity to public transportation routes/services.</p> <p>The proposed development also provides for the appropriate provision of bicycle parking. Generally, bicycle parking for houses will be easily accommodated within the curtilage of the property. Bicycle parking for proposed apartment / duplex units is provided in secure communal storage areas at quantum which</p>

	meets the standards required by the Apartment Guidelines.
<p>Principle 2: People Focused Mobility</p> <p>Goal 6: Take a whole of journey approach to mobility, promoting inclusive access for all.</p> <p>Goal 7: Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.</p>	<p>The subject site is located proximate to existing public transport (Luas / bus services), which will allow for ease of movement from the development to existing employment centres in the vicinity e.g., Saggart, Tallaght and Citywest, as well as everyday services and facilities in those settlements.</p> <p>The future population of the development will be supported through the provision of additional linkages and connectivity to these settlements and to the services and facilities they provide.</p> <p>The proposed development also provides for the appropriate provision of bicycle parking. Generally, bicycle parking for houses will be easily accommodated within the curtilage of the property. Bicycle parking for proposed apartment / duplex units is provided in secure communal storage areas at quantum which meets the standards required by the Apartment Guidelines.</p> <p>As detailed in the submitted road drawings and Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers, the proposed layout has taken care to provide for a definite hierarchy of streets, which prioritise pedestrian movement throughout the development. The proposed development has been designed for ease of access throughout the scheme, in accordance with Part M of the Building Regulations, with new accesses / connections provided to existing development adjoining the site, where appropriate. The design of the proposed dwellings has been carried out in accordance with the requirements of the Building Regulations (including Part M re: accessibility). A Universal Design Statement and a Site Universal Access Statement are included with this LRD planning application. Careful consideration has been paid to the topography of the site to ensure all dwellings/uses/open spaces are directly accessible from the street.</p>

Goal 8: Promote sustainable mobility through research and citizen engagement.	The design of the proposed layout is put forward having had regard to the relevant policy documents detailed throughout this Statement and the detail set out in the received LRD Opinion (Ref. LRDOP00325) from the Planning Authority for the subject application, thus ensuring an appropriate level of research, based on citizen engagement, has been undertaken.
Principle 3: Better Integrated Mobility Goal 9: Better integrate land use and transport planning at all levels. Goal 10: Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.	The design of the proposed layout is put forward having had regard to the relevant policy documents detailed throughout this Statement and the detail set out in the received LRD Opinion (Ref. LRDOP00325) from the Planning Authority for the subject application to ensure land-use and transport infrastructure appropriately integrate. In addition, national transport bodies such as the National Transport Authority and Transport Infrastructure Ireland will have the opportunity to comment on this application for LRD permission.

Table 9: Consistency with the SMP.

5.14.1 Evaluation of Consistency with the SMP

Given all the foregoing as set out in Section 5.14 of this Statement, , it is respectfully submitted the proposed development is fully compliant with the principles and goals of the SMP, and, as such, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended national policy/guidance.

6.0. Consistency with Regional Planning Policy

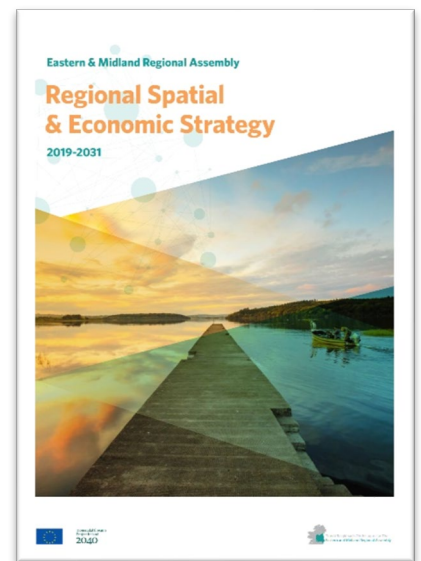
6.1 Introduction

6.1.1 This section of the Statement sets out the proposed development's compliance with a range of relevant regional planning policy documents namely:

- The Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031.
- The Transport Strategy for the Greater Dublin Area 2016 - 2035

6.2 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

6.2.1 The NPF has been supported by the establishment of statutory Regional Spatial & Economic Strategies for Ireland's three regional assemblies. The Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (hereafter "E&MRSES") is the relevant regional strategy for the proposed development.



6.2.2 The RSES is a strategic plan and investment framework which aims to shape the future development of the Eastern and Midland Region up to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the State. The strategy identifies that the Eastern and Midland Region: *"is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region."*

6.2.3 The E&MRSES seeks to achieve the 10 no. National Strategic Outcomes of the NPF through the implementation of 16 no. Regional Strategic Outcomes. To achieve these Regional Strategic Outcomes, each chapter of the RSES contains Regional Policy Objectives that promote coordinated spatial planning, sustainable use of resources and protection of the environment.

6.2.4 The 2016 Census Results states the population of Dublin City as being c. 554,554 persons with the E&MRSES outlining a projected population target of between 638,500 and 655,000 by the year 2031, increasing the city's population by 84,000-100,500 persons over the next 10 years (a 15% - 18% growth rate). This projected growth rate emphasises the need to efficiently develop lands available at higher densities and building heights. However, since the publication of the E&MRSES in 2019, both Census 2022 and the Revised NPF in 2025 have been issued. Census 2022 marked the first time in 171 years that the population of Ireland surpassed 5 million people. Census 2022 also showed that the population of Dublin grew by 8% to 1,458,154 which means the number of people in the county rose by 110,795 between April 2016 and April 2022. South Dublin County Council states on their website that

South Dublin has a population of 301,075 people living in 100,364 homes according to the 2022 census, an 8% population increase from the previous census in 2016. The Revised NPF states that “almost 50% of people in the State live in households of three people or fewer, with an average household size of 2.74 people”, and that “household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country”, which is considered may have impacts on the types of housing required to meet demand.

- 6.2.5** The E&MRSES details that the region has a young demographic profile with the overall working age population projected to rise in the next decade. Accordingly, this effects the demand for housing required to support the labour market with family homes and smaller and one-person households also needing to be addressed. The E&MRSES also details the prevailing state-wide trend of urbanisation, the region saw the continued increase in the share of population residing in urban areas alongside a strong growth in the peri-urban and rural areas surrounding Dublin. The region therefore has a challenge of counter-acting the severe slowdown in the development of new housing stock during the economic recession, which has resulted in supply and affordability pressures across housing tenures, particularly in Dublin.
- 6.2.6** The growth strategy for the region details the need to: “Support the continued growth of Dublin as our national economic engine”, and the need to: “Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP).” In order to achieve the objectives of both the NPF and the E&MRSES, the document reiterates the need to achieve sustainable compact growth through means such as urban regeneration and infill development to revitalise existing settlements.

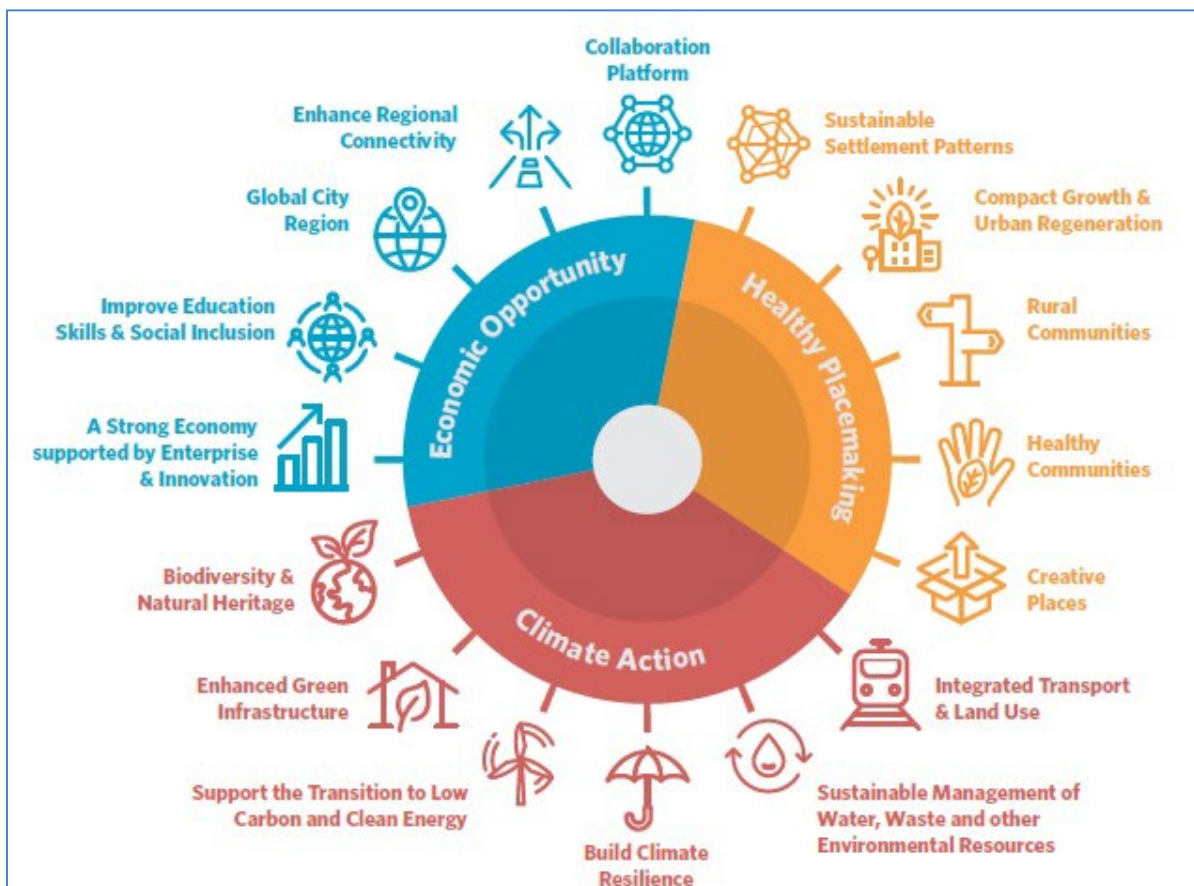


Figure 5: Regional Strategic Outcomes of the RSES.

6.2.7 Chapter 5 of the E&MRSES has regard to the Dublin Metropolitan Area Strategic Plan (MASP). The E&MRSES notes the challenges of housing supply and affordability in Dublin and states that it is imperative that Dublin builds on its existing strengths as a global metropolitan region to continue to attract and retain investment. The vision of the Dublin Metropolitan Area over the next 20 years emphasises the need to enable regeneration and employment opportunities in established communities where redevelopment and re-intensification occurs, especially in areas of on-going deprivation.

6.2.8 Section 5.3 of the E&MRSES details the guiding principles for the growth of the Dublin Metropolitan Area. Of relevance to the subject application are the following:

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

Integrated Transport and Land use - *“To focus 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.”*

Social Regeneration - *“To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.”*

6.2.9. Regional Policy Objectives of the E&MRSES considered most relevant to the proposed development are set out Table 9 below together with a statement of the proposed development's consistency with same.

Regional Policy Objective 3.2: *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.*

Statement of Consistency

The proposed development provides for the development of 611 no. new homes adjacent to the existing built-up suburban area of South Dublin and will see a residentially zoned site developed at an appropriate density. The proposed development supports the growth strategy of the E&MRSES by providing for a medium to high density residential development at an appropriate location, in compliance with the core strategy targets of the existing South Dublin County Development Plan. It is therefore considered the proposed development supports the continued growth of Dublin as our national economic engine and delivers sustainable growth of the Metropolitan Area.

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

Statement of Consistency

While not a 'brownfield' or traditional 'infill' site, the proposed development, on a greenfield site, provides for the appropriate development of a site which directly adjoins existing built up development and which is proximate to high quality public transport. The future population of the development will support existing public transport infrastructure in the area.

Consultation with Uisce Éireann ensures existing water infrastructure can support the proposed development's expected demand.

Regional Policy Objective 5.2: *Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, Bus Connects and the Greater Dublin Metropolitan cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.*

Statement of Consistency

There is a medium to long term roads objective travelling north-south through the middle of the site, and then east-west from the north-south route and connecting with Corbally Heath to the east. The proposed development will deliver both of these Development Plan roads objectives. Whilst not only improving vehicular links, these routes will also be important for pedestrian and cyclist movement.

In addition, the proposed development is designed to form part of the wider green infrastructure network in the vicinity, with routes for pedestrians / cyclists proposed throughout the development and accesses/connections provided to adjoining developments. An ample provision of bicycle parking is also proposed within the development.

Regional Policy Objective 5.3: *Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists*

Statement of Consistency

As stated above, there is a medium to long term roads objective travelling north-south through the middle of the site, and then east-west from the north south route and connecting with Corbally Heath to the east. The proposed development will deliver both of these roads objectives. Whilst not only improving vehicular links, these routes will also be important for pedestrian and cyclist movement.

In addition, the proposed development is designed to form part of the wider green infrastructure network in the vicinity, with routes for pedestrians / cyclists proposed throughout the development and accesses/connections provided to adjoining developments. An ample provision of bicycle parking is also proposed within the development.

Regional Policy Objective 5.4: *Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'[1], 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines[2], and 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

Statement of Consistency

The proposed development's consistency with the above-mentioned documents has been demonstrated throughout this Statement.

Regional Policy Objective 5.5: *Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin 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. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.*

Statement of Consistency

Regarding the sequential approaches to development, it is notable the subject site is a greenfield site, zoned "Res-N" for new residential development in the existing South Dublin County Development Plan and is located in adjacent to the built-up urban environs of South Dublin.

The proposed development is designed to integrate with existing surrounding residential development. The proposed development is therefore considered to be compliant with the sequential approach to development of land and makes efficient use of available lands by catering for a medium-density residential development in compliance with the land-use zoning objective attached to the site. The proposed development delivers the necessary linkages to existing pedestrian and cycle routes to public transport and services and facilities nearby.

The proposed development provides for a wide mix of one, two, three and four bedroom dwellings, in a range of houses and apartment / duplex unit typologies, thus catering for a variety of household formations and needs. All proposed dwellings are of an ample size to allow for ease of internal adaption should resident's requirements change over the course of their life cycle.

Regional Policy Objective 5.8: *Support the promotion and development of greenway infrastructure and facilities in the Dublin metropolitan area and to support the expansion and connections between key strategic cycle routes and greenways as set out in the NTA Greater Dublin Area Cycle Network Plan.*

Statement of Consistency

There is a medium to long term roads objective travelling north-south through the middle of the site, and then east-west from the north-south route and connecting with Corbally Heath to the east. The proposed development will deliver both of these roads objectives. Whilst not only improving vehicular links, these routes will also be important for pedestrian and cyclist movement.

In addition, the proposed development is designed to form part of the wider green infrastructure network in the vicinity, with routes for pedestrians / cyclists proposed throughout the development and accesses/connections provided to adjoining developments. An ample provision of bicycle parking is also proposed within the development.

Regional Policy Objective 8.1: *The integration of transport and land use planning in the Region shall be consistent with the guiding principles expressed in the transport strategy of the RSES.*

Statement of Consistency

The design of the proposed layout is put forward having had regard to the relevant policy documents detailed throughout this Statement and the previous pre-planning meetings for the subject application to ensure land-use and transport infrastructure appropriately integrate. In addition, national transport bodies such as the National Transport Authority and Transport Infrastructure Ireland will have the opportunity to comment on this LRD application for permission.

Regional Policy Objective 8.7: *To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.*

Statement of Consistency

Pinnacle Consulting Engineers have prepared the enclosed "Travel Plan" which promotes behaviour change and more sustainable transport use – please refer to this report for more details.

Regional Policy Objective 9.4: *Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.*

Statement of Consistency

The proposed development provides for a wide mix of one, two, three and four bedroom dwellings, including for a range of apartment / duplex unit typologies, thus catering for a variety of household formations and needs. All proposed dwellings are of an ample size to allow for ease of internal adaption should resident's requirements change over the course of their life cycle. As detailed elsewhere in this Statement, the proposed development complies with the requirements of both the 2023 and 2025 Apartment Guidelines.

Regional Policy Objective 9.10: *In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.*

Statement of Consistency

Pedestrian priority is of the utmost importance within the proposed development. The proposed development has been designed for ease of access throughout the scheme, in accordance

with Part M of the Building Regulations, with new accesses / connections provided to existing development adjoining the site, where appropriate.

Regional Policy Objective 9.21: *In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations.*

Statement of Consistency

Please refer to the enclosed Social Infrastructure Assessment which has examined the impacts of the proposed development on schools in the local area.

In accordance with the objective of the County Development Plan, a site has been reserved on the application site for a school, the details of which have been agreed in principle with the Department of Education (refer to the submitted Planning Statement for more details).

It is also noted that in March 2021, planning permission was granted to the Department of Education for a new educational campus of 2 new school buildings for a 1,000 pupil post primary school and a 16 classroom primary school to the north-west of the application site at Fortunestown Lane, Saggart

Regional Policy Objective 10.16: *Implement policies contained in the Greater Dublin Strategic Drainage Study (GDSDS), including SuDS.*

Statement of Consistency

As detailed in the documentation prepared by Roger Mullarkey & Associates Consulting Engineers and Gannon & Associates Landscape Architects, the proposed development includes for SuDS features, with the overall drainage proposals put forward in compliance with the GDSDS.

Table 10: Consistency with the E&MRSES.

6.2.10 Evaluation of Consistency with the E&MRSES

In accordance with the Regional Policy Objectives of the E&MRSES, the proposed development will deliver a medium to high density development of modern and adaptable new homes adjacent to existing built-up residential areas and in close proximity to existing public transport (Luas and bus services) and local service provision.

The proposed development will provide a high-quality, new, sustainable residential neighbourhood at a location that has been earmarked for new housing for many years, on lands zoned "Res-N", and will help to achieve the E&MRSES's overall aims and targeted growth figures for the Eastern and Midland Region. The proposed development will increase the local population and support existing / future public transport, services, and facilities in the area.

Based on all the foregoing, the development of the subject site is considered to be fully in accordance with the policies and objectives of the RSES and sustainable growth patterns.

6.3 **Transport Strategy for the Greater Dublin Area 2016 - 2035**

The Transport Strategy for the Greater Dublin Area 2016 - 2035 was prepared by the National Transport Authority to ensure that Dublin remains a competitive, sustainable city-region with a good quality of life for all. The strategy includes five overarching objectives to achieve the vision which are as follows:

- Build and strengthen communities.
- Improve economic competitiveness.
- Improve the built environment.
- Respect and sustain the natural environment.
- Reduce personal stress.

The strategy sets out measures to achieve the vision and objectives for the Greater Dublin Area. These include better integration of land use planning and transportation, consolidating growth, providing more intensive development at appropriate locations and better control of parking options. The strategy includes for several major infrastructure schemes which are part of the Government's Transport 21 investment framework.



6.3.1 Statement of Consistency with the Transport Strategy for the Greater Dublin Area 2016 – 2035:

The proposed development provides for a net density of 50 dwellings per hectare. The subject site is currently located c.670m walking distance from the nearest bus stop on the N82 Citywest Road to the east, while the “northern half” of the subject site is within 1km walking distance of the nearest Luas passenger stop to the north. It is therefore considered that the development is fully in compliance with vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.



7. Consistency with Local Planning Policy

7.1 Introduction

This section of the Statement sets out the proposed development's compliance with the South Dublin County Development Plan, 2022-2028.

7.2 South Dublin County Development Plan 2022-2028

The subject site is located within the administrative boundary of South Dublin County Council and is therefore covered by the existing South Dublin County Council Development Plan, 2022-2028 (hereafter "CDP").

This section of the Statement contains an assessment of the proposed development's consistency with the relevant policies and objectives of the CDP. The existing CDP was adopted on 22nd June 2022 and came into effect on 3rd August 2022.

7.2.1 Land Use Zoning

Under the existing CDP, the subject site is zoned "*RES-N: To provide for new residential communities in accordance with approved area plans*". Table 12.3 of Chapter 12 of the CDP lists both Residential and Childcare Facilities as uses that are "Permitted in Principle" under the "RES-N" land-use zoning objective.

Statement of Consistency Land-Use Zoning:

The proposed uses to be developed on the subject site include for residential and childcare facility use, both of which are listed as "Permitted in Principle" uses under the "RES-N" land-use zoning objective and, therefore, the proposed development is in compliance with the land-use zoning objectives for the site.

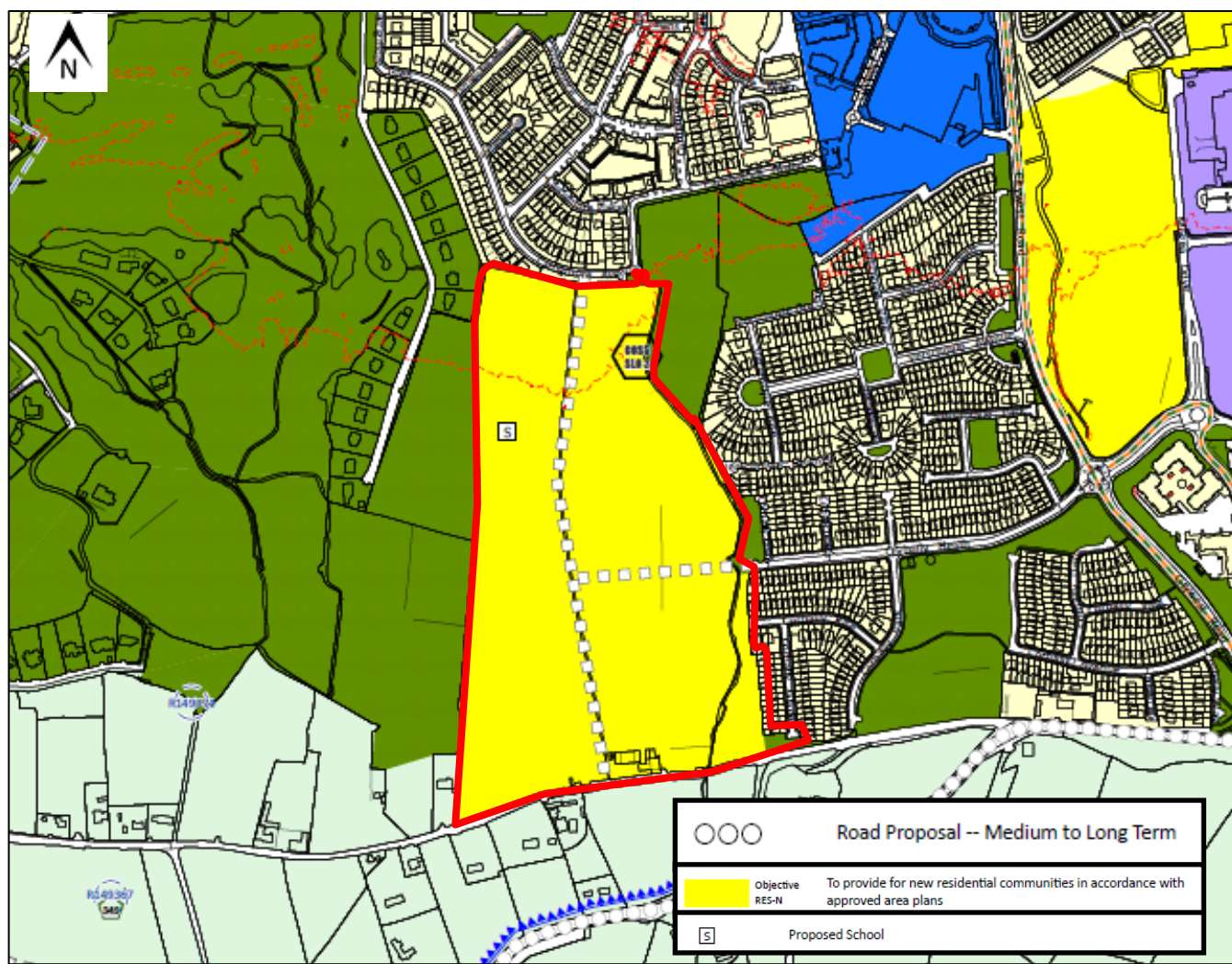


Figure 17: Copy of South Dublin County Development Plan Land Use Zoning Map 8 for Subject Site, with site indicatively outlined in red.

7.2.2 Core and Settlement Strategy

Chapter 2 of the existing CDP contains the Core Strategy and Settlement Strategy for the county during the life of the existing CDP, the purpose of which is to demonstrate that the quantum and location of development in the county aligns with national and regional planning policy.

The Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment needs of an additional c. 45,000 people up to the year 2028. The existing CDP states: *“To provide for this level of growth in line with National policy, a need for 23,730 new homes between the Census year 2016 to 2028 within the County has been identified”*.

Table 11 (Core Strategy Table 2022 – 2028) of the County Development Plan indicates the following key figures for Citywest:

- Total zoned land availability to 2028 – 64.1 hectares,
- Total housing units to 2028 – 2,113 units,
- Total population increase target to 2028 – 6,502 persons.

The County Development Plan acknowledges that Citywest sits with the 'Dublin City and Suburbs' category at Tier 1 of the Settlement Strategy as identified by the RSES (Table 14).

Figure 9 of the County Development Plan identifies 'Land Capacity Sites', which reflects the location of lands zoned for residential development to meet the population targets of the Core Strategy. As illustrated in the extract below, the application site is identified as a Land Capacity Site.

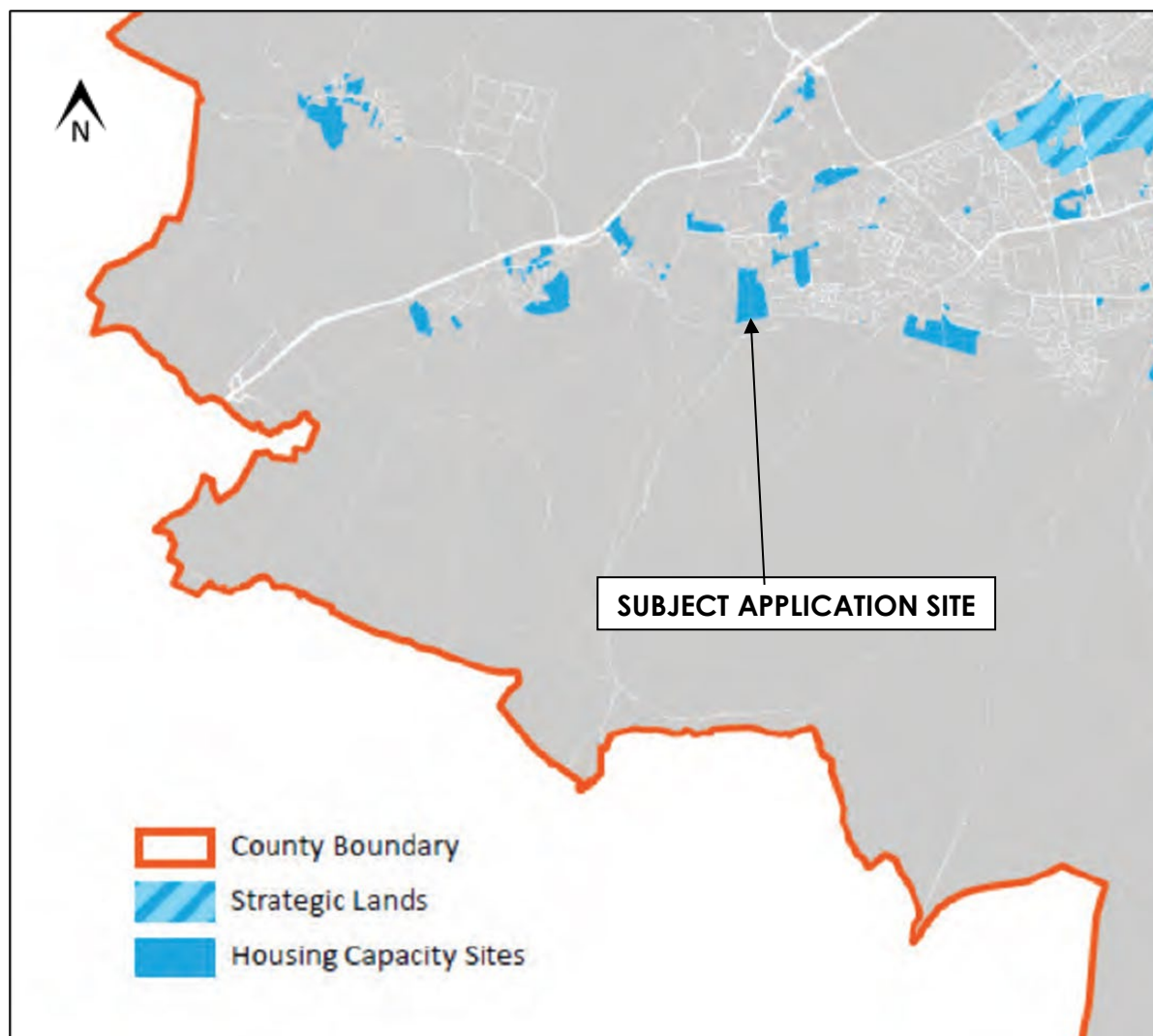


Figure 18: Copy of Figure 9 of the South Dublin County Development 2022 - 2028

Under "Key Urban Centres within Dublin City and Suburbs", the County Development Plan states the following:

"The relatively new district area, in Fortunestown/Citywest has been developing over the last number of years at a significant pace and is subject to a Local Area Plan. Its proximity to the Citywest Business Park has facilitated the delivery of housing and jobs beside each other which is supported by the Red Luas Line. The level 3 District Centre of Citywest shopping centre forms the centre of the new district area within and contiguous to the Dublin City and suburbs boundary. It has been one of the most active areas in terms of the delivery of housing for the County during the 2016 – 2022 Development Plan period. The delivery of commensurate levels of social and physical infrastructure to match recent and continued growth will be promoted in this area".

Figure 11 of the County Development Plan (see extract below) focuses on the neighbourhoods in South Dublin within the 'Dublin City and Suburbs' settlement. As can be seen below, Citywest is included and the area to the south and west of Citywest is identified as a 'MASP Residential Growth Area'.

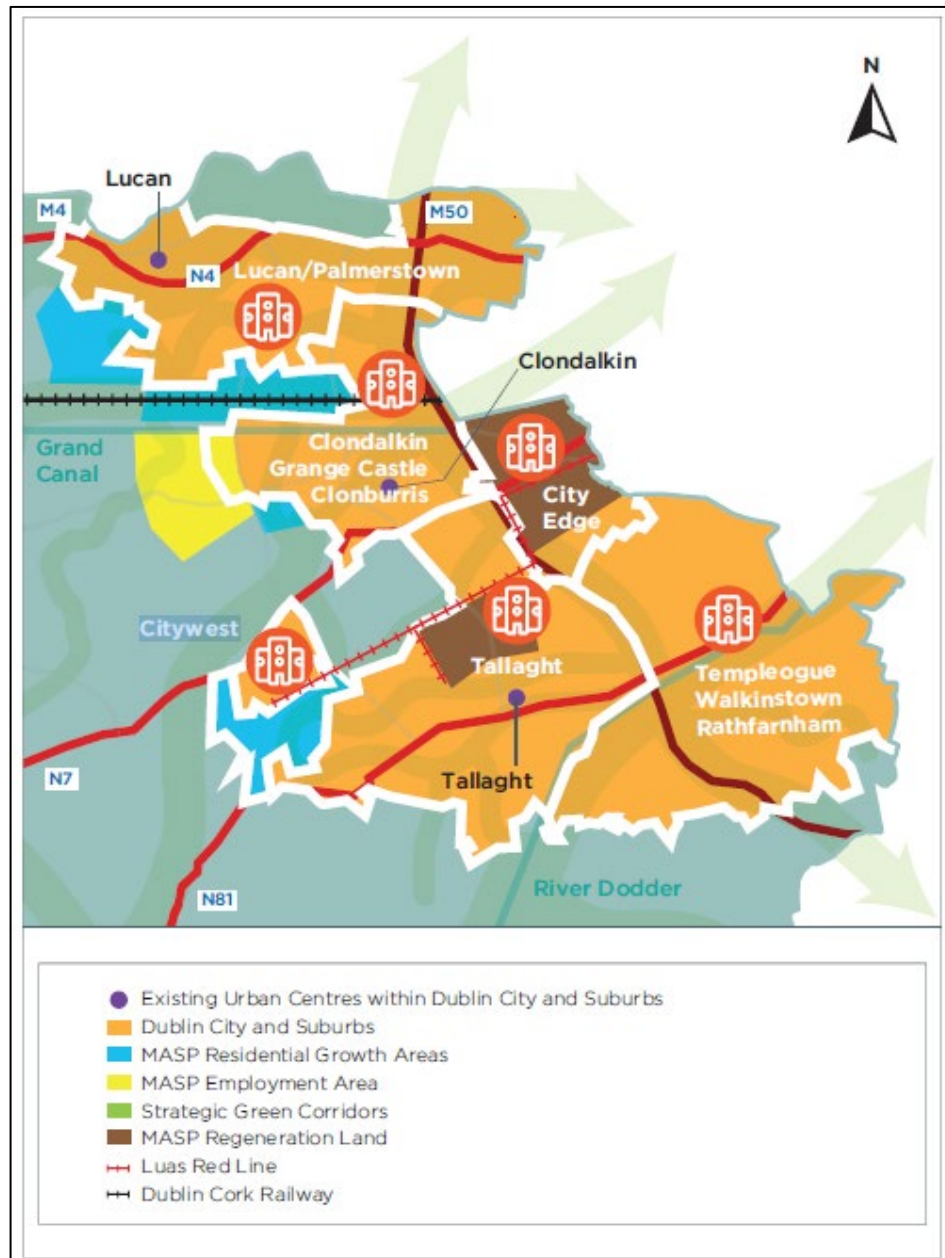


Figure 19: Copy of Figure 11 of the South Dublin County Development Plan 2022 – 2028

The following policies/objectives set out in the Core Strategy and Settlement Strategy of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/ Objective	Provision	Proposed Development's Consistency
Policy CS1: Strategic Development Areas	<i>Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.</i>	The Citywest area is identified as being within the Dublin City & Suburbs in the CDP (Figure 3). The proposal will contribute to the continued development of this outer suburban area.
CS1 Objective 1	<i>To ensure a sustainable and planned allocation of housing and employment growth within the strategic development areas of South Dublin County in line with the provisions of the MASP.</i>	
Policy CS3: Monitoring Population and Housing Growth	<i>Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County</i>	The subject site is zoned for residential development within the CDP, is identified as being within the Dublin City & Suburbs in the CDP (Figure 3) and is also identified as a "Housing Capacity Site" as per Figure 9 of the CDP. The proposal will contribute to the continued development of this outer suburban area.
CS3 Objective 6	<i>To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.</i>	
CS4 Objective 2	<i>To promote the delivery of residential development through active land management measures and a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites and under-utilised areas.</i>	The subject site is zoned for new residential development and is identified in the Core & Settlement Strategy of CDP as being a housing capacity site (Figure 9 of same).
Policy CS6: Settlement Strategy Strategic Planning Principles	<i>Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.</i>	The subject site is within 1km walking distance of existing public transport (bus and Luas) services, with the current proposal catering for clear and legible linkages along desire lines to bus and Luas stops.
CS6 Objective 2	<i>To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new</i>	The subject lands have been zoned for many years for new residential development. An overall net residential density of 50 units per hectare has been achieved in accordance with CS6 Objective 4 . The

	homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).	scheme is also located within 1km of Dublin Bus and Luas Stops to the north and east which provide high-quality public transport options to Dublin City and surrounding South Dublin County.
CS6 Objective 4	To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and / or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.	<p>The proposed development facilitates active, sustainable travel patterns, by placing a focus on walking and cycling.</p> <p>The proposed development is a medium to high density, residential development located close to existing Luas and bus services. It will provide an alternative to unsustainable patterns of car-dependent residential development.</p> <p>The residential units achieve frontage onto all public open spaces and street networks, which enhances passive surveillance and creates a sense of safety for users.</p>
CS6 Objective 5	To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and to existing developments which need them.	
Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement	Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary	The site also benefits from a high level of local amenities and services including employment centres, retail, education and healthcare facilities, as has been identified in the s Social Infrastructure Assessment (SIA) submitted with this application.
CS7 Objective 1	To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and	<p>The proposed development includes the construction of a childcare facility which will meet the needs of the future population within the scheme.</p> <p>The application site is zoned specifically for residential development and is located adjacent to existing services and facilities, with excellent public transport accessibility to</p>

	amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.	other centres. In this respect, a strong residential led scheme supported by an on-site creche provision is considered to be entirely appropriate.
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Table 11: Consistency with the South Dublin CDP Core Strategy and Settlement Strategy.

7.2.3 The CDP and the Fortunestown Local Area Plan, 2012.

The subject application site was previously subject to the Fortunestown Local Area Plan, May 2012 (Extended), however, this LAP has since lapsed and no alternative LAP has been prepared for the area, nor for the subject lands at Boherboy. The "Boherboy Neighbourhood" as previously identified in the Fortunestown LAP consisted entirely of the two fields that are now the subject of this application for permission. We note that the current land use zoning objective attached to the site under the CDP is "Res-N": *"To provide for new residential communities in accordance with approved area plans"*, however, whilst the 2012 LAP has since lapsed, several of the former LAP requirements have been carried through as Specific Local Objectives (SLOs) within the current CDP, all of which are detailed in this Statement of Consistency, and as follows:

- **COS5 SLO2:** *"To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands"*.
- Road Proposal – 6 Year – Various Streets within the Fortunestown LAP

It is acknowledged that the relevant land use zoning objective "RES-N" seeks: *"To provide for new residential communities in accordance with approved area plans"*, and that there is no current approved area plan in place applicable to the subject site. However, we refer to another approved LRD to the east in the townlands of Bohernabreena, Oldcourt and Killininny, under the same CDP, was subject to a similar issue. That LRD (under Ref.s LRD24A/0007 and ABP-321419-24, approved on 8th April 2025) was granted by An Bord Pleanála and at the time of granting permission, those lands were not subject to an approved area plan as the previous Ballycullen-Oldcourt Local Area Plan, 2014 had expired and similar to the subject site at Boherboy, no new / subsequent LAP had been prepared or was in place.

Subject to a third party appeal subsequent to the decision of SDCC to issue a notification of a decision to grant permission, the An Bord Pleanála Inspector recommended a decision to refuse permission for the aforementioned LRD (Ref. ABP-321419-24) for one reason only, as follows: *"The majority of the subject site is zoned 'RES-N – New Residential', the objective of which is to 'provide for new residential communities in accordance with approved area plans'. Having regard to the recent expiry of the Ballycullen - Oldcourt Local Area Plan 2014, in the context of the western LAP lands, the proposed development cannot comply with this zoning objective applying to the site. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area"*. However, in

deciding not to accept the Inspector's recommendation and to issue an Order to Grant Permission for the LRD, the Board addressed the issue of the previous LAP / "approved area plan" having expired as follows:

"The sole concern of the inspector related to the full wording of the RES-N zoning which relates to the majority of the subject site, which has the objective, to provide for new residential communities in accordance with approved area plans'. The Board considered the facts of the case, along with the detail of the overall statutory development plan. In this regard the Board noted that the development plan does not set out what approved area plans may mean in terms of precise procedural exercises, and whether for example, any such approved plan might relate to a specific application site and project, or to an overall identified zoned land area and what form approval of any such area plan should take (for example it may be a plan conceived by the applicant, perhaps with input from the planning authority and noted by the Council). Furthermore, and in any case the Board noted that the subject site and wider lands also zoned RES-N have previously been the subject of a formally adopted Local Area Plan (LAP), statutorily approved, which provides a fully usable base of detail for the rational layout and design of these subject lands. While this plan may have recently expired, it is evident from the detail within the application and appeal, that the proposed development has evolved in accordance with the principles set out therein. Indeed, it is noted that planning permissions have been granted both on the subject site and within the wider area for schemes which reflect the content of this LAP. It is also noted that the current county development plan incorporates a specific road objective across the subject site. This road objective reflects that set out in the LAP".

The Board went onto state: "In this regard the Board determined that it is reasonable to deduce that the LAP is in the manner of an approved area plan within the overall meaning of development plan zoning objective RES-N and on the facts of this case which propose a development which reflects the layout and design principles from that area plan, that a grant of permission in this instance is warranted and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N. This reasonable conclusion is affirmed by reference to case precedent on separate lands also zoned RES-N and as determined by the planning authority. Planning permission LRD23A/0001 was granted by South Dublin County Council in 2023. The planning officer's report in that case noted that a Local Area Plan that was approved for the area within which that application site was located had expired in 2022. The planning authority stated that 'a new plan has not yet been formulated for the area however, the scheme has evolved in accordance with the Fortunestown LAP, and it is considered that this satisfies the requirements of the RES-N zoning objective'. This is considered a reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the broad meaning of the full wording of RES-N. That LRD case as determined by the planning authority, offers an appropriate definition of approved area plan for the purposes of the RES-N zoning objective. The Board considered that the current case is comparable".

The Board also noted that the LRD, in the townlands of Bohernabreena, Oldcourt and Killininny, "the zoning of the site permits residential development; that the Core Strategy and Housing Capacity set out within the development plan includes reference to RES-N lands as part of the zoned land resource allocated for housing development. Furthermore, the Board noted that the Oldcourt-Ballycullen Local Area Plan, which was approved, while now expired, offers a key set of layout and design principles, from which the proposed development has evolved. It is also noted that any approved area plan in whatever

meaning, including an adopted LAP will always be subservient to the policies and objectives of the statutory development plan".

The Board concluded: "In conclusion the Board concluded, differently to the recommendation of the inspector, that the proposed development, on its facts and by reference to the overall meaning of the zoning objective and associated provisions of the statutory development plan, can be deemed to comply with the zoning objective in this instance. The proposed development is located on lands the zoning of which facilitates its use for housing, and having regard to the nature, scale, form and extent of development, it is considered to be in accordance with the proper planning and sustainable development of the area".

The context of the subject site and LRD application is similar to that outlined above under permitted Ref.s LRD24A/0007 and ABP-321419-24, whereby the previous LAP has expired and there is no current LAP in place. The subject site at Boherboy is the last significant, zoned, undeveloped land parcel under the old Fortunestown LAP. Many of the design / development parameters set out in that LAP have been (a) included in the current development proposal now put forward for permission and (b) have been carried forward into the current CDP – i.e. reserved school site, roads objectives to the north connecting into Carrigmore and east connecting into Corbally etc. It is evident in assessing all relevant factors in this LRD application for permission e.g. design, layout, green infrastructure, biodiversity, accessibility etc. that the site layout plan and design principles have all derived from the previous Fortunestown LAP.

Furthermore, it is put forward that the current land use zoning objective "RES-N" permits residential development. The current CDP and its Core Strategy, as well as its identification of the subject lands at Boherboy as being a "Housing Capacity Site", includes reference to RES-N lands as part of the zoned land resource allocated for housing development.

In addition to the above, we note that the Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) has had regard to this issue and acknowledges that it is "directly transferrable to this current LRD application", for the following reasons:

- **"Lack of Conflict with the County Development Plan:** The Board noted that the South Dublin County Development Plan 2022-2028 doesn't actually provide any direction on what is or is not meant by the term "Approved Area Plan" from a procedural perspective meaning that there was no conflict with same.
- **Continuation of the Previously Approved LAP Objectives:** Whilst the LAP for the application site had expired, the proposal continued many of the objectives (including those relating to design and layout) of the expired LAP, meaning that it was in accordance with a previously approved Local Area Plan for the area and therefore a grant was warranted "and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N".
- **Delivery of Roads Objectives within the Adopted County Development Plan:** The proposal delivered a new Road that was identified as an objective within the approved South Dublin County Development Plan 2022-2028.
- **Planning Precedence:** It noted that the Council had previously supported an LRD application on RES-N zoned lands in 2023 in which the former LAP for the application

site (i.e. the Fortunestown LAP) had expired (SDCC Ref: LRD23A/0001). It noted that in reaching its decision for LRD23A/0001, the Planning Authority had concluded that whilst the LAP had expired, the proposal was deemed to be in line with several of the objectives of the LAP and was therefore deemed to satisfy the RES-N zoning objective. The Board went on to conclude that such an approach to development on RES-N land was “a reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the board meaning of the full wording of RES-N” and offered the Board with an appropriate definition as to what was meant by an approved area plan for the purposes of the RES-N zoning objective”.

NOTE: the permitted development under Ref. LRD23A/0001 is on land that was also previously subject to the 2012 Fortunestown LAP, with the Planning Authority granting permission for 384 no. dwellings and a creche in March 2023, subsequent to the expiry of the LAP in May 2022.

In addition to the above, the Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) states: “The Planning Authority can now confirm that the purpose of including the term “approved area plan” within the RES-N zoning objective in the CDP was to avoid piecemeal development. It sought to avoid proposals which did not include the full ‘RES-N zoning parcel’ coming forward in isolation of any understanding of how it would later fit with the remainder of the ‘RES-N zoning parcel’ in terms of layout, access, permeability etc. The reference was designed to encourage such applicants in coming forward with additional masterplan/framework context. It was accepted that for those sites that brought forward a complete RES-N zoning parcel, that such an exercise was not necessary”.

The Planning Authority goes on to state that in relation to the current LRD proposal on the Boherboy site it “is satisfied, that notwithstanding the fact that the Fortunestown LAP has now expired, that the current proposal, subject to it meeting each of the other relevant objectives of the CDP, meets the intent of an “approved area plan” for the following reasons:

- **Extent of the RES-N Land Parcel:** The proposal relates to the full RES-N ‘Zoning Parcel’. Following earlier feedback from the Planning Authority on the need to bring this ‘zoning parcel’ forward in a joint and holistic manner, both applicants came together to prepare a combined proposal covering the full zoning parcel, other than for the reserved school site, which remains available for the Department of Education to bring forward as and when the need arises. Notwithstanding the fact that the school is not yet coming forward, the applicant has shown their own proposal in the context of the school site and has actively engaged with the Department of Education and Skills (DES) to ensure it has no objection to the proposal.
- **Relationship with the Surrounding Area:** The applicant has been working with the Planning Authority over the design of the proposed scheme for several years, taking on board design advice in relation to how the site should be accessed from a vehicular and pedestrian perspective, the locations of height across the site, the retention of key features etc.
- **Planning Precedence:** As noted above, An Bord Pleanála concluded as part of its assessment of SDCC Ref LRD24A/0007 / ABP Ref ABP-321419-24 that such an approach

to development on the RES-N sites was a “reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the board meaning of the full wording of RES-N”.

The Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) concludes: *“In summary, whilst additional refinement/clarity is still needed on some items (discussed in further detail below), the Planning Authority is satisfied that, the proposed land uses can be facilitated on the site, subject to them being in accordance with the relevant policies and objectives contained within the CDP and that sufficient detail has been provided by the applicant as part of the submitted documentation to satisfy the “approved area plan” requirements per the meaning of the RES-N Zoning objective”.*

As previously detailed, the subject site is located within the lands previously subject to the Fortunestown LAP, 2012, now expired. We note from their assessment that of the LRD to the east in the townlands of Bohernabreena, Oldcourt and Killininny this year, whereby the relevant LAP for that area had also expired, that An Bord Pleanála stated “any approved area plan in whatever meaning, including an adopted LAP will always be subservient to the policies and objectives of the statutory development plan”.

The current County Development Plan, 2022-2028, includes a number of references to the Fortunestown / Citywest area within which the subject site is located, as well as various objectives, such as *inter alia*:

- **QDP14 SLO1** - *To ensure the sustainable long-term growth of Citywest that promotes and facilitates the development of the Citywest/Fortunestown area in accordance with the Fortunestown Local Area Plan ensuring that phasing is not contravened and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.*
- **SM4 Objective 7** - *To implement the Six Year Roads Programme set out under Table 7.5 and to work towards the implementation of the Medium to Long Term Roads Objectives under Table 7.6 where feasible and subject to funding. (We note that the relevant CDP land use zoning map identifies a north south and east west link, both six-year road objectives. Table 7.5 of the County Development Plan refers to “Formation of a strategic street network providing access to the Fortunestown LAP lands”. The proposed development delivers these roads objectives on the subject site).*
- **COS5 SLO2** - *To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands. (With regard to the above, SDCC approved a Part 8 scheme to satisfy this SLO on the 11th December 2023. The Part 8 approves extensive upgrades to the facilities at Carrigmore Park to fully satisfy the SLO).*

The above objectives are in addition to the reservation of a school site on the Boherboy lands for future use by the Department of Education (upon confirmation of their need for same) which was originally an objective of the 2012 LAP but is now an objective of the CDP.

Whilst expired, the Fortunestown LAP also contained the following objectives that have been incorporated into the design of the LRD now put forward for permission, thus

demonstrating that the proposed development is in line with several of the objectives of the LAP and therefore satisfies the current RES-N zoning objective attached to the site:

- i. Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian access to community facilities, schools, open spaces, shopping facilities, local employment and public transport stops **(Objective AM15)**.
- ii. Create an integrated network of biodiversity strips through the Plan Lands by way of linking, preserving and incorporating existing hedgerows (especially those at Boherboy and Cheeverstown), wildlife corridors, green corridors and existing streams with a necklace of parks in a manner that forms a link between the Plan Lands and the Dublin Mountains. All developments relating to planting and water features should be cognisant of the potential for creating bird hazard to aviation. **(Objective G11)**
- iii. Ensure that each of the neighbourhoods throughout the Plan Lands will be provided with green spaces that each have a clear role or function and fits within the plan's hierarchy and network of linked spaces as outlined in Table 5.1. **(Objective G12)**
- iv. Ensure that all development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity. **(Objective G13)**
- v. A 10 metre (min) biodiversity strip (measured from the top of the bank) shall be maintained on both sides of the sections of watercourse that are designated for preservation under the Local Area Plan, for flood management, landscape and biodiversity reasons. These biodiversity strips shall protect, improve and enhance the natural character of the streams and accommodate pedestrian and cycle corridors where possible. Culverting of sections of watercourses that are designated for preservation will not be permitted. Limited sections of streams may be sensitively diverted where appropriate with the highest standards of engineering design and environmental mitigation to avoid significant negative environmental impact, taking full account of flood risk assessments etc. **(Objective G14)**
- vi. The use of SUDS is a requirement for all new developments in order to reduce surface water run-off and to minimise the risk of flooding of the Plan Lands and surrounding lands. Existing springs will be protected and maintained and incorporated into SUDS. **(Objective G15)**
- vii. All planning applications for residential and/or commercial floorspace on sites in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is carried out at the site-specific level in accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009). The scope of flood risk assessment shall depend on the type and scale of development and the sensitivity of the area. **(Objective G17)**
- viii. Development of the Boherboy, Fortunestown Centre and Saggart- Cooldown Commons neighbourhoods shall each include for the provision of a primary school site (three in total) that measures at least one hectare. **(Objective LUD3)**

- ix. Require planning applications for any building(s), street(s) or space(s) to be accompanied by a masterplan layout drawing that details how the proposed building(s), streets(s) or space(s) fits within the framework for the neighbourhood to which they relate in terms of accessibility and movement; integration of development; density and land use; green infrastructure and built form. These framework elements can be varied in terms of precise location and design provided that they conform to the principles and guidance set out in this Local Area Plan. Existing utilities should be accommodated between blocks and under streets. **(Objective F1).**
- x. Ensure that each neighbourhood is developed with open ended and integrated pedestrian and cycle routes that link with the Fortunestown Centre and adjacent neighbourhoods. **(Objective F2).**
- xi. The first phase of development in the Boherboy Neighbourhood shall include for through routes to the Carrigmore and Saggart Abbey estates in a manner that provides indirect access from the Boherboy Neighbourhood onto Fortunestown Lane, to the Fortunestown and Saggart Luas stops and onto Citywest Avenue. **(Objective BN1).**
- xii. A pedestrian and cyclist link shall be provided between the first phase of development in the Boherboy Neighbourhood and the district park to the rear (south-west) of the Citywest Shopping Centre. **(Objective BN2).**
- xiii. Development of the Boherboy Neighbourhood shall include for cyclist and pedestrian circuit routes that link the District Park with the Boherboy Road via a choice of routes. **(Objective BN3).**
- xiv. Densities at the upper end of the scale shall only be located in the northern areas of the Boherboy Neighbourhood subject to the achievement of vehicular access through the Carrigmore Estate and pedestrian access through the District Park and District Centre. The lower densities shall be implemented in the southern areas of the neighbourhood. **(Objective BN4).**
- xv. Development of the Boherboy Neighbourhood shall accord with the Local Area Plan's Phasing Strategy and shall include for the provision of a primary school site of not less than one hectare. **(Objective BN5).**
- xvi. A 10 metre (min) biodiversity strip (measured from the top of the bank) shall be reserved along both sides of the designated sections of the Corbally Stream for flood management, landscape and biodiversity reasons. This biodiversity strip shall cater for a pedestrian/cycle path from the Boherboy Road to the public open space to the north-east (District Park) as part of Phase 1 of development of the Boherboy lands. **(Objective BN5a).**
- xvii. Development across the Boherboy Neighbourhood shall protect and incorporate its existing rolling topography and its existing hedgerows and streams especially the watercourse and hedgerow that demarcates the old townland boundary between Boherboy and Gibbons. **(Objective BN6).**
- xviii. Development proposals on the south-west corner of the Boherboy lands shall either avoid the lands above the 150 metre contour through the provision of an appropriately landscaped buffer (see Section 7.2.15) or demonstrate design integration with the

landscape through measures that may include a combination of low density housing (i.e. bungalows or similar) and properly landscaped public open space that would be of benefit to the development of the site and lands as a whole. (Objective BN7a).

Taking into account all of the foregoing, it is respectfully put forward that whilst the Fortunestown LAP, 2012 has expired and has not been replaced an updated LAP, the subject site at Boherboy is currently zoned objective "RES-N" which permits residential development. The current CDP and its Core Strategy, as well as its identification of the subject lands at Boherboy as being a "Housing Capacity Site", includes reference to RES-N lands as part of the zoned land resource allocated for housing development.

The design and layout of the proposed LRD has evolved in accordance with the various design parameters and objectives that were previously set out in the LAP and that the majority of lands that were subject to the Fortunestown LAP have been granted permission and developed which reflect the content of this LAP, with the subject site being the final "neighborhood" within that LAP to be developed / secure planning permission. It is also noted that the current County Development Plan incorporates specific roads objective across the subject site, and that these roads objective reflect that set out in the LAP.

The proposed LRD reflects the layout and design principles from the now expired LAP and in line with An Bord Pleanála's determination (under Ref. ABP-32141924 at Bohernabreena, Oldcourt and Killinenny), it is put forward that granting the permission currently being sought on the Boherboy site *"is warranted and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N"*. This assertion is in keeping with the aforementioned LRD permission granted in April 2025 and the Planning Authority's decision to grant permission on another site previously subject to the Fortunestown LAP (Ref. LRD23A/0001) in April 2023, with both grants of permission issued after the expiry of the relevant LAPs and under the current CDP, 2022-2028.

In their LRD Opinion for the subject proposal, the Planning Authority has acknowledged that it *"is satisfied, that notwithstanding the fact that the Fortunestown LAP has now expired, that the current proposal, subject to it meeting each of the other relevant objectives of the CDP, meets the intent of an "approved area plan" for a variety of reasons as outlined above.*

7.2.4 The Delivery of Sustainable Neighbourhoods – 'The Plan Approach'.

It is noted the existing CDP (Section 5.2.1) promotes the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.

In accordance with **QDP2 Objective 1** of the existing CDP, which seeks: *"To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design"*, the following provides details as to how 'the Plan Approach' eight key design principles have been incorporated into the design of the proposed development.



Figure 19 - Extract from Figure 1 of the CDP "Eight Design Principles".

1. Context - Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area.

The subject site is a greenfield site, zoned for residential development, located adjacent to existing residential developments and open space, with the Dublin mountains to the south. As already detailed in this Planning Statement, the site is located within the Citywest / Fortunestown area of the County which is recognised in the CDP as a new district that is identified for residential growth and is a "MASP Residential Growth Area". The subject site is the last significant land bank that was formally identified as the "Boherboy Neighbourhood" in the now expired Fortunestown LAP, with all of the other neighbourhoods in that LAP now committed in terms of housing delivery and extant permissions. The proposed development seeks to continue the delivery of new housing in the area and significantly contribute to the completion of housing development the Citywest / Fortunestown area.

The proposed development has been designed to be complementary to and cognisant of its receiving environs, providing a scheme which:

- (i) is visually and physically connected with existing residential estates to the north and east,
- (ii) has a variety of neighbourhood zones / character areas and housing typologies which respect the existing character of the area and provides for an appropriate level of variety and visual interest,
- (iv) has an ample provision of public open space including connections to the adjoining Carrigmore Park,
- (v) takes into account the sloping nature of the site and appropriately responds to same in terms of housing typology, building height and stepped arrangement of buildings as necessary,
- (vi) provides for appropriate building heights (in the majority two & three storeys) with taller

buildings located in appropriate areas so as to lessen any visual impact,

- (vii) retains existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss,
- (viii) prioritises pedestrian and cyclist permeability and green infrastructure throughout, and
- (ix) provides for an efficient and viable level of density.

2. Healthy Placemaking – *Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.*

The proposed development provides for a quantum of public and communal open space which meets the requirements of the existing CDP and the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023).

The creation of active street frontages is achieved by designing a highly permeable layout which promotes passive surveillance and prioritises use by pedestrians and cyclists. The use of different treatments and typologies proposed within each character area creates distinctive areas within the scheme adding vibrancy and strong visual interest to the proposed scheme creating a sense of place for this new neighbourhood.

An ordered series of urban residential cells is proposed across the scheme connected by a hierarchy of streets and related open spaces. The new street network is legible and easy to navigate. It promotes permeability throughout the scheme itself and also provides easy connections to the neighbouring housing development areas, Carrigmore Park, the District Centre / Citywest Shopping Centre and Luas.

A series of secondary routes lead to quieter groupings of houses and homezones providing more pedestrian friendly streets. All housing cells are carefully considered and respond to their context and topography. The house facades overlook, supervise and define the edges of streets and public landscaped blocks.

The proposed development caters for an ample provision of public open space, while the proposed layout and the siting of buildings within the scheme has been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provide for supplementary planting to support loss.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as the large Carrigmore Park to the north-east with new pedestrian / cyclist connections into same proposed as part of this application for permission. Pedestrian and cyclist accessibility has been prioritised throughout to afford users ease of access to all open spaces within the development and to neighbouring developments / lands.

The proposed layout allows for full integration of the proposed development with adjoining residential

estates, with pedestrian and cyclist permeability / connections to these adjoining estates provided for thus creating a safe and accessible scheme for both future residents and visitors. The proposed road network has been subject to an independent road safety audit as part of this application for permission and is designed in compliance with DMURS principles to ensure safe movement for all users within the development.

3. Connected Neighbourhoods - Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods.

Regarding public transport, there are numerous bus operators providing a bus service locally and within walking distance to the site. Measured from the centre of the site, the nearest stop, located on the N82 Citywest Road, is

located approximately 670m away, with the following bus services being available: route no.s 65, 65b, 69, 77a, W62 and S8. Measured from the centre of the site, the Luas Red Line (Saggart/Tallaght to Conolly/The Point) calls at the Fortunestown Luas Stop which is located approximately 950m north of the subject site. The Luas has a major terminus at the Square, Tallaght which is also a major terminus for Dublin Bus. The Square is served by Dublin Bus with several local routes.

Regarding pedestrian and cyclist infrastructure, segregated pedestrian and cyclist infrastructure is proposed throughout the development, with ancillary off-road routes and connections also provided throughout, ensuring pedestrians and cyclists are prioritised within the development.

The proposed development also caters for an appropriate level of secure and covered communal bicycle storage areas for the proposed apartment and duplex units, with houses accommodating bicycle parking within their curtilage. It is fully considered the proposed development promotes a transition to more sustainable transport modes as a priority.

4. Thriving Economy - Ease of access to and availability of good jobs and a good quality of life for the community at large.

The subject site is located within the lands identified as the new district of Citywest / Fortunestown with the Citywest Shopping Centre being c.1km walking distance north-east of the subject site. The site is proximately situated close to major employment centres to the north-east and east including Citywest Business Campus, Magna Park. Dublin city centre is located approximately 12km to the north-east of the site and easily accessible via Citywest Road (N82) connecting with the M7 (Naas Road) to the north, and Tallaght Town Centre (County Town) is located c.3.5-4km to the north-east of the site. Given the locational context of the site, including proximity to key roads infrastructure in the vicinity and access to public transport services (existing bus and Luas services), the proposed car parking provision, the ample provision of proposed bicycle parking as well as the provision of dedicated pedestrian and cyclist routes and infrastructure throughout the development, it is considered evident that future residents will have ease of access to, and availability of, good jobs, services and facilities and thus a good quality of life.

5. **Inclusive and Accessible - High quality services, community infrastructure and open spaces accessible to all.**

Were the subject site to be left undeveloped, it will remain an underutilised, zoned, and serviceable site that is inaccessible to the public. The proposed development provides for an efficient use of this zoned site, catering for residential development that will contribute to the receiving environs and supports the continued sustainability of nearby employment centres.

The proposed development caters for an ample provision of public open space, while the proposed layout and the siting of buildings within the scheme have been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss. Overall, c.18% of the net development site area is provided as public open space, designed to a high quality and catering for varying forms of recreation.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other existing public open space areas adjoining the site.

The proposed site layout plan allows for full integration of the proposed development with adjoining residential estates, with pedestrian and cyclist permeability / connections to these adjoining estates creating a safe and accessible scheme for both future residents and visitors.

Set out in section 7.15 of the accompanying Planning Statement are details of the Applicants' proposal to pay a contribution in lieu of the provision of community facilities on the subject site, which has been agreed in principle with the Planning Authority, prior to the submission of this LRD planning application – please refer to same.

6. **Public Realm - A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play.**

The proposed layout and design ensure a strong urban streetscape is catered for along the length of the main link street traversing the development, with proposed dwelling typologies also considering the sloping nature of the site to ensure visual amenity and a sense of place is promoted.

The design of the proposed buildings and housing typologies are complimentary to the existing adjoining developments at Carrigmore and Corbally as well as the semi-rural nature of the site and character of the wider receiving environs. The submitted Architectural Design Statement prepared MCORM & Davey+Smith Architects illustrates how the proposed buildings will present to street frontages and adjoining developments, seamlessly fitting into the sloping topography of the site and creating passive surveillance throughout the development.

Landscaping plans for the proposed development, included as part of this application for permission,

ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other permitted and existing public open space areas adjoining the site.

Animated and active frontages are promoted throughout the development via own door access units and the location / siting of proposed communal and public open space areas. The proposed layout caters for direct vehicular and pedestrian / cyclist permeability from Boherboy Road through the entire site, connecting to Corbally to the east and Carrigmore to north in line with the CDPs roads objectives, with off-road permeable pedestrian and cyclist routes also catered for to ensure pedestrians and cyclists are a priority.

The proposal to develop the subject site for residential use, in compliance with the land-use zoning objective attached to the site, will cater for increased occupancy and breathe new life into the area, with the proposed development designed to cater for five character areas of differing character and styles, thus creating well-defined areas within the overall development which will ensure the feeling of a sense of place for future residents.

7. Built Form and Mix – Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure.

The layout of the proposed dwellings / buildings has been considered in terms of the contextual location of the site and the immediate surrounding context. The proposed development is designed to cater for varying character areas within the overall site of differing characters and styles, thus creating distinct areas within the overall development which will ensure the feeling of a sense of place for future residents.

The proposed development provides for suitable building heights (in the majority two / three storey), with taller buildings located in the northern yet lower part of the site, which is deemed appropriate, all of which creates a level of visual interest and act as nodal points / minor recognisable landmarks within the development. The proposed building heights and typologies also take into consideration the topography of the site, in particular the sloping nature of the site, views of the Dublin mountains to the south, and the residential amenity of existing residential developments which abut the site. This has been carefully considered as part of the submitted Landscape and Visual Impact Assessment carried out by DNV which is enclosed as Chapter 11 of the submitted EIAR and accompanying photomontages.

The architectural composition of the development takes cognisance of the locational context of this site to develop housing which is both compatible with this outer suburban area and complies with the objectives of the CDP, whilst continuing with the design parameters previously set out in the now expired Fortunestown LAP. The proposed houses, apartments and duplex blocks are contemporary in style and layout; however, they complement the style and character of the wider Citywest / Fortunestown area. There is variation in material finishes and building form, but with variations in each of these parameters to ensure this development will have distinctive character areas within the proposed development.

8. Design and Materials - *High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.*

MCORM and Davey+Smith Architects, along with Gannon & Associates Landscape Architects have prepared the submitted architectural and landscaping proposals which, based upon the principles of good urban design, are put forward for permission. The proposed houses / apartments and duplex blocks are traditional in their scale but contemporary in style and layout, which is respectful of the style and character of the wider Citywest / Fortunestown area. There is variation in material finishes and building form, but with variations in each of these parameters to ensure this development will have distinctive character areas within the proposed development.

The landscape proposals have been designed to complement the semi-rural setting of the site and neighbouring lands in terms of biodiversity and SUDs features and will create an amenable development that will successfully assimilate into its setting as it matures over time. Please refer to the submitted architectural design statement and landscaping design rationale documents prepared by MCORM and Davey+Smith Architects and Gannon & Associates Landscape Architects for further / full details.

7.2.5 Chapter Policies and Objectives of the South Dublin CDP

The remaining pages of this Statement detail the relevant policies and objectives of the various chapters of the existing South Dublin CDP together with the proposed development's consistency with same.

Natural, Cultural and Built Heritage

Chapter 3 of the existing CDP contains the policies/objectives for the Natural, Cultural and Built Heritage aspects of the county during the lifetime of the existing development plan. The following policies/objectives set out in Chapter 3 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy NCBH1: Overarching	<i>Protect, conserve and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.</i>	<p>The site has been assessed holistically from the outset, having regard to the site characteristics, relationship to existing development and to adjacent settlements, and applying a masterplan concept to the overall design in terms of the existing site features.</p> <p>The existing trees, drainage ditches, streams, surrounding lands and topographical aspects have all been considered. This process has been important in determining a landscape masterplan which is respectful of the key aspects of the landscape fabric.</p>
NCBH1 Objective 1	<i>To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development</i>	<p>The retention of hedgerows and trees, insofar as is practicable, and appropriate, creation of biodiversity/ecological buffers and careful consideration of interventions to Boherboy Road, together with ensuring that the massing, scale and design of the proposal integrates with the surrounding character will ensure that the proposed development appropriately assimilates into the receiving environment.</p> <p>The site layout plan and landscape design combine to ensure an inviting environment for residents and the wider community to enjoy a leisurely walk/jog/cycle throughout the development. The landscape design incorporates a variety of native vegetation species into the landscape project, promoting not only a pleasing aesthetic but also contributing to the preservation of local biodiversity and the integrity of the ecosystem.</p>

NCBH1 Objective 2	<p><i>To support the objectives and actions of the County Heritage Plan and the County Biodiversity Action Plan in the promotion and protection of natural, built and cultural heritage, and to take full cognisance of the County's Landscape Character Assessment and the County Geological Audit in the sustainable management of development</i></p>	<p>Where possible the scheme has adopted a collaborative approach to the protection and reinforcement of key green infrastructure elements existing on site, which is demonstrated by the quantum of tree/ hedgerow retention on the site.</p> <p>The site layout principles have also been significantly influenced by the natural heritage and landscape strategy, and based on the following principles:</p> <ul style="list-style-type: none"> ▪ Retaining the existing key landscape elements, principally the hedgerow planting and existing trees; ▪ Create a safe environment which people can enjoy at any time of day; ▪ Enhance wildlife and biodiversity. This ethos will be not only incorporated into the design process from day one but also become an integral part of the ongoing education for the residents and visitors; ▪ Creating opportunities for both formal and informal play, encouraging interaction with nature in the form of 'playful and inventive' landscape; ▪ Providing a co-ordinated approach to connectivity, open space provision, tree planting, bio-diversity, SUDS, lighting and underground utilities.
Policy NCBH2: Biodiversity	<p><i>Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</i></p>	<p>A variety of native vegetation species are incorporated into the landscape design, promoting not only a pleasing aesthetic but also contributing to the preservation of local biodiversity and the integrity of the ecosystem.</p> <p>Preserving hedgerows in their majority as part of the landscape plan is crucial as they serve as essential wildlife habitats, provide aesthetic value, and offer practical benefits like windbreaks and erosion control. They contribute to biodiversity, enhance</p>

		<p>the landscape's visual appeal, and ensure a sustainable and harmonious outdoor environment.</p> <p>The necessary 10m minimum buffers along the eastern and western boundaries have also been applied, which are free from development, (and are not included as part of the open space calculation) thus acting as ecological / biodiversity corridors.</p>
NCBH2 Objective 1	<i>To support the implementation of the National Biodiversity Action Plan (2017- 2021) and the All-Ireland Pollinator Plan (2021-2025) and to support the adoption and implementation of the South Dublin County Biodiversity Action Plan (2020-2026) and Pollinator Action Plan (2021-2025) and any superseding plans.</i>	<p>This LRD planning application is accompanied by an Appropriate Assessment (AA) Screening Report and an EIAR which address impacts on biodiversity. The enclosed AA Screening has identified 'Special Areas of Conservation' and 'Special Protection Areas' within 15km of the site.</p> <p>Having regard to the pattern of permitted development in the immediate vicinity, it is considered likely at this juncture that the proposed development will not will adversely affect the integrity of European sites.</p>
NCBH2 Objective 2	<i>To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation</i>	
NCBH2 Objective 3	<i>To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as 'stepping stones' for the purposes of green infrastructure and Article 10 of the Habitats Directive.</i>	
NCBH2 Objective 4	<i>To protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the river</i>	
Policy NCBH3: Natura 2000 Sites	<i>Conserve and protect Natura 2000 sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</i>	<p>This LRD planning application is accompanied by an Appropriate Assessment (AA) Screening Report and an EIAR which address impacts on biodiversity. The enclosed AA Screening has identified 'Special Areas of Conservation' and 'Special Protection Areas' within 15km of the site.</p>

NCBH3 Objective 1	<p><i>To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote the favourable conservation status of the habitats and species integral to these sites.</i></p>	<p>An Appropriate Assessment (AA) Screening Report has been prepared for the proposed LRD which assessed the impact of the proposed development on the following Qualifying Interest (QI) habitats and/or the QI/Special Conservation Interest (SCI) species of a European site(s):</p>
NCBH3 Objective 3	<p><i>To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and / or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92 / 43 / EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.</i></p>	<ul style="list-style-type: none"> ▪ Glenasmole Valley SAC (001209), ▪ Wicklow Mountains SAC (002122), ▪ Wicklow Mountains SPA (004040), ▪ Rye Water Valley/Carton SAC (001398), ▪ Red Bog, Kildare SAC (000397), ▪ Poulaphouca Reservoir SPA (004063), ▪ South Dublin Bay SAC (000210), ▪ South Dublin Bay and River Tolka Estuary SPA (004024), ▪ North Bull Island SPA (004006), ▪ North Dublin Bay SAC (000206), ▪ North-west Irish Sea SPA (004236), ▪ Rockabill to Dalkey Islands SAC (003000), ▪ Baldoyle Bay SPA (004016), ▪ Malahide Estuary SPA (004025), ▪ Rogerstown Estuary SPA (004015). <p>The submitted AA Screening Report concludes that “Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in</p>

		combination with other plans and projects, can be excluded" and that "In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered. Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)".
Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas	<i>Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</i>	This LRD planning application is accompanied by an EIAR (Chapter No. 5 - Biodiversity) which has considered the impact of the proposed development on local watercourses e.g. Corbally, Cooldown, and Coldwater Streams.
NCBH5 Objective 1	<i>To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.</i>	Chapter 5 Biodiversity of the enclosed EIAR includes an Ecological Impact Assessment of the proposed development. It also sets out a range of mitigation and monitoring measures – please refer to Chapter 5 of the EIAR for full details.
NCBH5 Objective 2	<i>To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals</i>	
Policy NCBH6: Dublin Mountains	<i>Protect and enhance the visual, environmental, ecological, geological, archaeological, recreational and amenity value of the Dublin Mountains, as a key element of the County's Green Infrastructure network</i>	This LRD planning application is accompanied by an EIAR (Chapter No. 5 – Biodiversity, Chapter 6 – Land & Soils, & Chapter 12 – Archaeology & Cultural Heritage) which has considered the impact of the proposed development on each of the aforementioned environmental factors. In addition, the proposed landscape design has considered the ecological

		<p>and cultural context of the subject site, with the landscape concept seeking to:</p> <ul style="list-style-type: none"> (i) develop a versatile green infrastructure corridor that seamlessly connects urban and rural while facilitating linkages with other regional corridors, (ii) protect and enhance the area's heritage, special amenity, and recreational value, (iii) improve ecological habitats facilitating movement for protected species and supporting various ecosystem services, (iv) preserve and enhance the landscape character and amenity of the area. <p>It is evident from the submitted site layout plan and landscape design strategy that the proposed development seeks to protect and enhance existing planting on site as well as facilitating visual and physical links to the mountains to the south.</p>
Policy NCBH10: Invasive Species	<i>Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species.</i>	<p>The subject site has been assessed and monitored from an ecological perspective over a long period of time, as confirmed by the enclosed details prepared by Scott Cawley, and there is no indication to date of invasive species on site. We refer the reader to Chapter No. 5 – Biodiversity of the enclosed EIAR for more details,</p>
NCBH10 Objective 1	<i>To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and / or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477 / 2011).</i>	

NCBH11 Objective 3	<i>To protect and retain existing trees, hedgerows, and woodlands which are of amenity and / or biodiversity and / or carbon sequestration value and / or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account Living with Trees: South Dublin County Council's Tree Management Policy (2015-2020) or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.</i>	<p>The trees and hedgerows on the subject site have been assessed by Arborist Associates and we refer the reader to the enclosed arboricultural assessment including a tree protection plan and tree constraints plan that accompany this LRD planning application.</p> <p>The arboricultural assessment and feedback have been essential in the development of the site layout proposals and the consideration of the location of built development on the site to ensure a sympathetic response to existing vegetation and to allow for retention of same insofar as possible.</p>
NCBH11 Objective 4	<i>To protect the hedgerows of the County, acknowledging their role as wildlife habitats, biodiversity corridors, links within the County's green infrastructure network, their visual amenity and landscape character value and their significance as demarcations of historic field patterns and townland boundaries.</i>	The proposed development includes significant retention of hedgerows. The integration and preservation of hedgerows are integral to the overall landscape strategy for the development. The overarching goal is to strike a balance between connectivity and environmental preservation, crafting an urban housing development that actively supports biodiversity and provides a serene experience.
Policy NCBH13: Archaeological Heritage	<i>Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</i>	This LRD planning application includes an EIAR, and Chapter 12 of same "Archaeology & Cultural Heritage" assesses the impacts of the proposed development on archaeology and cultural heritage of the site - please refer to same for details.
NCB13 Objective 2	<i>To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects.</i>	
Policy NCBH14: Landscapes	<i>Preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development</i>	It is evident from the submitted site layout plan and landscape design strategy that the proposed development responds to the site, surrounding and landscape character in the area. For example, the height strategy has been carefully cognisant of the site's topography, focusing taller buildings on the lower parts of the site. Lower height and density development has

NCBH14 Objective 1	<i>NCBH14 Objective 1 To protect and enhance the unique landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2021).</i>	been proposed in the southern part of the site, at higher topography and adjacent to the more semi-rural character of Boherboy Road.
NCBH14 Objective 4	<i>To require a Landscape / Visual Impact Assessment to accompany all planning applications for significant proposals, located within or adjacent to sensitive landscapes and to provide mitigation measures to address any likely negative impacts.</i>	This LRD planning application includes an EIAR, and Chapter 11 of same "Landscape and Visual Assessment" describes the landscape and visual context of the proposed development and outlines the landscape and visual effects of the development proposal.
Policy NCBH15: Views and Prospects	<i>Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.</i>	The LVIA concludes that "the Proposed development will not result in and significant landscape or visual impacts. Considering the zoning and emerging trends for such zonings, the construction stage landscape and visual impacts for the Proposed Development can be considered negative to neutral in quality, very low to very high in magnitude, negligible to moderate/major in significance and short term impacts (less than 7 years).
NCBH15 Objective 2	<i>To require a Landscape / Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.</i>	<p>The operational stage landscape and visual impacts can be considered to reduce to, negative to neutral in quality, very low to medium in magnitude and negligible to moderate in significance and long term impacts.</p> <p>There is an impact on landscape but it is consistent with the prevailing planning policy context and sustainable development objectives enunciated in international, national, regional and local policy and the impact can be considered neutral in quality, medium in magnitude, moderate in significance, and long term impacts".</p> <p>Please refer to Chapter 11 of the EIAR and submitted verified views / photomontages for more details.</p>

NCBH17 Objective 3	<i>To continue to promote use of the Irish language in the naming of new residential developments.</i>	Upon a grant of permission for the proposed development, an appropriate naming and numbering proposal shall be submitted for approval to the Planning Authority, in compliance with this objective.
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Table 12: Consistency with the South Dublin CDP Chapter 3.**Green Infrastructure**

7.2.1 Chapter 4 of the existing CDP contains the policies/objectives for Green Infrastructure. The following policies/objectives set out in Chapter 4 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy GI1: Overarching	<i>Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.</i>	<p>The proposed development provides large areas of public open space with green areas, new and existing trees / hedgerows and planting.</p> <p>The proposed development incorporates significant hedgerow retention which will enhance the biodiversity of the site, as well as the creation of a bio-retention park. Plans include improving habitats on site and the presence of flora and fauna and introducing native planting to create strong ecological corridors.</p>
GI1 Objective 1	<i>To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.</i>	The proposed open spaces will contribute to the green infrastructure network in the area. Gannon & Associates, Landscape Architects have prepared a comprehensive landscape design strategy to demonstrate useability and functionality that is married with biodiversity and SUDS requirements. The provision of buffers free from development separate to but alongside open spaces creates new biodiversity and amenity spaces.

		<p>The public open spaces will provide both recreational space for the residents and space for the local biodiversity to thrive.</p> <p>The open space landscape network has been designed to provide for ecological value in the area, and this function will be enhanced by incorporating SUDS features.</p>
GI1 Objective 3	<p><i>To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.</i></p>	<p>The proposed development occupies a large site, c. 18.7 Ha, with over 2.3 Ha dedicated to open spaces of varying size, form and function, in addition to over 3Ha of the site reserved for biodiversity/ecological protection.</p> <p>The open spaces are provided in larger and smaller spaces dispersed across the site, all providing their own character and useability. Refer to the Landscape Design Rationale by Gannon & Associates, Landscape Architects for more specific information in this respect. These open spaces ensure a chain of open space features on the site, many of them incorporating and maintaining existing natural features.</p> <p>Paths and connections are designed to be ecologically sustainable, incorporating permeable materials and considering the natural flow of the landscape. These elements not only served functional purposes but also promote accessibility and harmonious integration with the surroundings.</p> <p>Details of the integration of the proposed landscaping and SuDS strategy are set out in the submitted landscape design rationale.</p> <p>This LRD application is also accompanied by an Appropriate Assessment Screening Report.</p>

G11 Objective 4	<i>To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.</i>	Please refer to the submitted landscape design rationale prepared by Gannon & Associates, Landscape Architects for full details on the Green Infrastructure Strategy employed as part of the proposed development, which includes the use of native vegetation, selective tree and hedgerow removal, paths and connectivity, preservation of landscape views, plants for pollinators and preservation of hedgerows.
Policy GI2: Biodiversity	<i>Strengthen the existing Green Infrastructure (GI) network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the Eastern and Midlands Region Spatial and Economic Strategy (RSES)</i>	The site is located outside the green corridors defined in the CDP's Green Infrastructure Map. However, it is positioned close to important ecological features, including the Camac River corridors and the Citywest-Saggart Link. These features provide an opportunity to integrate green infrastructure and enhance the project's environmental quality.
GI2 Objective 1	<i>To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.</i>	The submitted landscape strategy seeks to create green continuity, connecting the site with the nearby parks and natural areas. By considering the transition zones and buffer zones, the project aims to strengthen the integration with the urban and natural environment, ensuring a continuous green network that promotes sustainability, leisure, and quality of life for users, while enhancing ecological connectivity between the various spaces around.
GI2 Objective 2	<i>To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect</i>	As above.

	<i>development sites post construction to ensure hedgerow coverage has been protected as per the plan</i>	
GI2 Objective 4	<i>To integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter</i>	
GI2 Objective 5	<i>To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.</i>	<p>The hedgerows on the western and central boundaries of the site are not thought to form townland, parish or barony boundaries, however, the eastern boundary of the site, along the Corbally Stream is a townland and barony boundary.</p> <p>The proposed development includes the retention of a considerable proportion of hedgerows. The integration and preservation of hedgerows are integral to the landscape concept, creating an environment where the sounds of birds, rustling leaves, and flowing water can be enjoyed. The overarching goal is to strike a balance between connectivity and environmental preservation, crafting a cityscape that actively supports biodiversity and provides a serene experience.</p> <p>Preserving hedgerows in a landscape plan is crucial as they preserve local heritage items, serve as essential wildlife habitats, provide aesthetic value. They contribute to biodiversity, enhance the landscape's visual appeal, and ensure a sustainable and harmonious outdoor environment. Refer to the submitted landscape design rationale which identifies the hedgerows to be retained.</p>
Policy GI3: Sustainable Water Management	<i>Protect and enhance the natural, historical, amenity and biodiversity value of the County's watercourses. Require the long-term management and protection of these watercourses as significant elements of the</i>	Roger Mullarkey & Associates Consulting Engineers have provided reports and information regarding water management on site. The proximity of the site to streams,

	<i>County's and Region's Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate. Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian corridors and the application of appropriate restrictions to development within these corridors.</i>	<p>aquifers and water abstractions; potential sources, pathways and impacts of pollution; and the historical uses of the site and nearby areas have been examined early in project planning and design, to ensure that suitable redesign and mitigation measures are undertaken as necessary.</p> <p>A Site Specific Flood Risk Assessment (SSFRA) of the proposed development has also been undertaken by Kilgallen & Partners, Consulting Engineers and is included in this LRD application as a separate standalone report – please refer to same. The SSFRA includes a Justification Test and concludes that <i>“The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective”</i>.</p>
GI3 Objective 1	<i>To ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan.</i>	In addition to the submitted EIAR, DNV has also prepared a hydrological impact assessment which is submitted as separate report – we refer the reader to both documents.
GI3 Objective 2	<i>To require development proposals that are within riparian corridors to demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.</i>	The integrity of the riparian strips is maintained through dedicated design. The design incorporates biodiversity buffers along the eastern and western boundaries, ensuring that these riparian strips are respected and maintained and not encroached upon by any built development. These buffers do not form part of the public open space provision. Specific details are included in the Landscape Design Rationale by Gannon & Associates, Landscape Architects – please refer to same.
GI3 Objective 3	<i>To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank</i>	As above, the integrity of the riparian strips is maintained through dedicated design. The design ensures that the riparian strips are respected and maintained and not encroached upon by any built development, nor are they proposed as part

	<i>is maintained / reinstated along all watercourses within any development site</i>	of the public open space provision on site. Specific details are included in the Landscape Design Rationale by Gannon & Associates, Landscape Architects.
Policy GI4: Sustainable Drainage Systems	<i>Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.</i>	Roger Mullarkey & Associates Consulting Engineers have proposed a series of SUDS measures as part of the water management system. These proposals have been carefully incorporated into the landscape design for the development, with the engineering and landscaping proposal fully coordinated, and also taking into account flood risk and ecological requirements. Please refer to the submitted engineering & landscaping drawings and reports for details.
GI4 Objective 1	<i>To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.</i>	SuDs are proposed as part of the drainage solution for the development and are detailed in the enclosed Engineering Planning Report prepared by Roger Mullarkey & Associates Consulting Engineers. All of the SuDs proposals are multifunctional and incorporate the provision of open spaces and biodiversity.
GI4 Objective 2	<i>To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.</i>	The SuDs features proposed aim to replicate the natural characteristics of rainfall runoff of any site by providing control of run-off at source and this has been achieved by the current proposal.
GI4 Objective 3	<i>To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.</i>	The proposed development includes proposals that are designed to mitigate against climate change through landscaped areas and SuDs.
GI4 Objective 4	<i>To require that all SuDS measures are completed to a taking in charge standard.</i>	
GI4 Objective 5	<i>To promote SuDS features as part of the greening of urban and rural streets to restrict or delay runoff from streets entering the storm drainage network.</i>	The surface water drainage infrastructure for the development will collect and treat the rainfall on the site and convey the runoff via roadside swales, tree pits, bio-retention areas, rain garden planters, open course conveyance swales, pipes,

		manholes, catchpit manholes and direct the flows via 9 no. open detention basins and 1 no. below ground attenuation system towards vortex flow restricting devices (Hydrobrake or similar) and petrol interceptors before outfalling to the existing on site open watercourses.
G14 Objective 6	<i>To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Drainage Systems (SuDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.</i>	Roger Mullarkey & Associates Consulting Engineers have proposed a series of SUDS measures as part of the water management system. These proposals have been carefully incorporated into the landscape design for the development, and also take into account flood risk and ecological requirements. Please refer to the submitted engineering & landscaping drawings and reports for details.
Policy GI5: Climate Resilience	<i>Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate</i>	The submitted landscape design proposals include a clear green infrastructure strategy which includes the planting of a variety of native vegetation, including carefully selected plants chosen to encourage pollination, preservation of hedgerows as they serve as essential wildlife habitats, provide aesthetic value, and they contribute to biodiversity, enhance the landscape's visual appeal, and ensure a sustainable and harmonious outdoor environment.
G15 Objective 1	<i>To protect and enhance the rich biodiversity and ecosystems in accordance with the ecosystem services approach to development enabling mitigation of climate change impacts, by absorbing excess flood water, providing a buffer against extreme weather events, absorbing carbon emissions and filtering pollution.</i>	
G15 Objective 4	<i>To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF)</i>	Refer to the submitted Green Infrastructure Report for details of the Green Space Factor that is achieved (0.60) by the proposed development (section 4).

	<i>Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).</i>	
GI5 Objective 7	<i>To require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council's ongoing SuDS strategy development.</i>	Green roofs are incorporated into the proposed design and details of same are provided in the submitted Engineering Planning Report – please refer to same.
Policy GI6: Human Health and Wellbeing	<i>Improve the accessibility and recreational amenity of the County's GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.</i>	The proposed development includes significant new landscaped open spaces and ecological buffers free from development in an interlinked format, particularly noting the linear connectivity provided along the eastern part of the site. These new spaces also incorporate, retain and protect existing natural assets such as hedgerows and trees, whilst the buffer / riparian strip follows the route of the stream on the site, making the stream an integral component of the proposed development.
GI6 Objective 1	<i>To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses (See Chapter 8: Community and Open Space).</i>	The proposed development provides a range of open spaces. The open spaces provided are capable of accommodating multiple uses, as detailed in the submitted landscape design rationale.
GI6 Objective 3	<i>To provide accessible, attractive and safe routes linking settlements to the GI network of the County.</i>	A variety of green links are proposed throughout the development that will connect to adjoining lands on all sides (refer to the submitted Landscape Design Report). Paths and connections are designed to be ecologically sustainable, incorporating permeable materials and considering the natural flow of the landscape. These elements not only serve functional purposes but also promote accessibility and harmonious integration with the surroundings.

GI6 Objective 4	<i>To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8: Community and Open Space of this Development Plan and South Dublin County's Parks and Open Space Strategy</i>	Over c.2.3 Ha of public open space is provided throughout the scheme with a hierarchy of open spaces provided for. Each space provides for meaningful recreation including playground / nature play, fitness activity, running racks, teen areas, nature walks – refer to the submitted landscape design rationale for details.
GI6 Objective 5	<i>To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</i>	Pedestrian and cyclist connectivity and permeability throughout the development is catered for and incorporated into the landscape design - refer to the submitted landscape design rationale for details. These proposed facilities will complement the ecological features on the site.
GI6 Objective 6	<i>To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3: Natural, Cultural and Built Heritage and Chapter 12: Implementation and Monitoring).</i>	A public lighting layout is enclosed, prepared in conjunction with the landscaping and ecological proposals for the development.
Policy GI7: Landscape, Natural, Cultural and Built Heritage	<i>Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the County Heritage Plan.</i>	In line with this policy the topography, views from the site and the existing biodiversity are all being respected, enhanced and incorporated into the site layout plan for the proposed development – as demonstrated in the submitted LVIA and photomontages.
GI7 Objective 1	<i>To protect, conserve and enhance natural, built and cultural heritage features and restrict development that would have a negative impact on these assets in accordance with the provisions of Chapter 3: Natural, Cultural and Built Heritage of this Development Plan.</i>	
GI7 Objective 2	<i>To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the</i>	The proposed development makes best use of land on this highly accessible site while also providing c.19% of the net

	<i>appearance and character of the landscape, in accordance with the provisions of South Dublin's Landscape Character Assessment and the provisions of Chapter 3: Natural, Cultural and Built Heritage of this Development Plan.</i>	developable area of the site as public open space and catering for a variety of recreational activities. Existing hedgerows and townland boundaries are being respected and incorporated into the overall design of the scheme. Over 3Ha of the site is reserved for the ecological and biodiversity protection separate to the public open space provision.
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Table 1: Consistency with the South Dublin CDP Chapter 4.

Quality Design and Healthy Placemaking

Chapter 5 of the existing CDP contains the policies/objectives for Quality Design and Healthy Placemaking within new developments. The following policies/objectives set out in Chapter 5 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy QDP1: Successful and Sustainable Neighbourhoods	<i>Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities</i>	The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to/from adjoining residential developments to the east and north.
QDP1 Objective 1	<i>To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</i>	The application is designed in accordance with these S.28 Ministerial Guidelines as detailed in the foregoing section 5 of this Statement.

QDP1 Objective 2	<i>To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated)</i>	The application is designed in accordance with these S.28 Ministerial Guidelines as assessed above and the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers confirms that the proposed development is fully compliant with DMURS – please refer to same.
QDP1 Objective 6	<i>To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy towards the delivery of long term sustainable communities</i>	The proposed development comprises a fully integrated mix of private and Part V dwellings, supported by residential amenities including new public parks and a childcare facility.
Policy QDP2: Overarching – Successful and Sustainable Neighbourhoods	<i>Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.</i>	The scheme has regard to the eight key design principles with details of same set out in section 7.2.4 of this Statement, and section 4.1.5.1 of the submitted Planning Statement.
QDP2 Objective 1	<i>To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.</i>	The scheme has regard to the eight key design principles with details of same set out in section 7.2.3 of this Statement, and section 4.1.5.1 of the submitted Planning Statement. This LRD planning application is also accompanied by an Architectural & Urban Design Statement which outlines the design rationale and urban design approach applied to the proposed development, including details of the five character areas within the proposed development – please refer to same.
QDP2 Objective 2	<i>To ensure that 'The Plan Approach' to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under section 247 of the Planning & Development Act, 2000, as amended).</i>	

Policy QDP3: Neighbourhood Context	<i>Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.</i>	The proposed development contributes positively to the character and uses within the surrounding area. It enhances public amenities through the provision of significant additional open space for use by new and existing residents, and a childcare facility.
QDP3 Objective 1	<i>To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 12: Implementation and Monitoring in relation to design statements.</i>	The proposed development contributes positively to the character and uses within the surrounding area. It is appropriate in size and scale to the location and the size of the site, and it offers an appropriate and high quality design response which will enhance the character of the area. The careful integration of the new development with the site's topography and the existing trees and hedgerows further assists in assimilating the development with the existing setting.
QDP14 SLO1	<i>To ensure the sustainable long-term growth of Citywest that promotes and facilitates the development of the Citywest/Fortunestown area in accordance with the Fortunestown Local Area Plan ensuring that phasing is not contravened and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.</i>	<p>It is noted that the Fortunestown LAP has now expired and as such the relevant local planning policy context is set by the County Development Plan.</p> <p>In terms of phasing, refer to the phasing layout submitted by MCORM Architects (drawing no. 0016) and section 11 of the enclosed Planning Statement for details. The proposed development is to be delivered in 3 phases, generally from south the north. Phase 1 comprises the southern portion of the site, Phase 2 comprises the central portion of the site, and Phase 3 the northern portion of the site. Open spaces, both communal and public, will be delivered concurrent with the phases.</p> <p>The site also benefits from a high level of access to local amenities and services including employment centres, retail, education and healthcare facilities, as has been identified in the enclosed Social Infrastructure Assessment (SIA).</p>

QDP3 Objective 9	<i>To preserve, incorporate, enhance and respond to the setting of existing archaeological and historic features including burgage plots and tower house sites where these arise.</i>	The proposed development has been assessed in terms of any archaeological impacts and the details of same are set out in Chapter 12 "Archaeology & Cultural Heritage" of the enclosed EIAR – please refer to same.
Policy QDP4: Healthy Placemaking	<i>Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.</i>	The layout of development has been designed around a number of public open spaces with a range of residential character areas provided.
QDP4 Objective 1	<i>To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and infrastructure in line with the provisions of NPO 4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES.</i>	The site is unique given its topography and site constraints and offers the opportunity to provide a residential development with a distinctive sense of place, that will successfully assimilate into its receiving environs.
QDP4 Objective 2	<i>To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.</i>	The proposal provides an attractive development which increases the legibility of the area, and the careful positioning of the proposed dwellings ensures all open spaces are overlooked guaranteeing safety and security as well as universal access to all.
Policy QDP5: Connected Neighbourhoods	<i>Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.</i>	<p>The scheme supports the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to services in surrounding larger settlements.</p> <p>New, dedicated pedestrian and cyclist links are created throughout the development providing ease of movement throughout the scheme and to adjoining lands / neighbourhoods, while new public open spaces and parks are provided. The layout is logical, and wayfinding is uncomplicated.</p>

QDP5 Objective 1	<i>To improve the accessibility of all identified centres (see Chapter 9 Table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure including cycling and walking, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7: Sustainable Movement and Appendix 12: Our Neighbourhoods for further details).</i>	Pinnacle Consulting Engineers have prepared a Traffic & Transport Assessment which outlines accessibility to the surrounding catchment area – please refer to same.
QDP5 Objective 2	<i>To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres</i>	The proposed design maximises accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to/from adjoining road network. These will provide more direct access to local services and public transport services.
Policy QDP6: Public Realm	<i>Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.</i>	The public realm within the proposed development has had regard to South Dublin County Council's taking in charge standards, to ensure appropriate ongoing maintenance and management. The full project team has contributed to the public realm proposals across a number of considerations, ranging from location, scale/extent, design, accessibility/legibility, materials, and consideration of future management/maintenance. This multi-disciplinary approach is in accordance with the policy.
QDP6 Objective 1	<i>To require that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 12: Implementation and Monitoring - Design Statements and Public Realm).</i>	The layout of development has been designed around public open spaces creating an enhanced public realm within this area. The hierarchy and distribution of open spaces throughout gives the development a parkland setting creating a distinctive sense of place.

QDP6 Objective 6	<i>To ensure that all new developments but particularly apartment developments where gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, both mentally and physically.</i>	<p>All apartments / duplex units have private balconies/terraces.</p> <p>The provision of communal open space is addressed in further detail in the Landscape Design Rationale by Gannon & Associates., and their enclosed landscape drawings.</p> <p>Communal open space for residents will predominantly be provided within the residential courtyards and within the blocks. The overall quantum of the Communal Open Space required is 2,176sq.m. Communal open space provision is 4,750sq.m. Ramps, private spaces, unusable incidental space have been omitted from the calculation.</p>
QDP6 Objective 7	<i>To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height and of a high quality where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge in order to leverage the opportunity to improve the quality of boundary treatments</i>	<p>Suitable boundary treatments are to be provided to the parkland/amenity spaces throughout the scheme. Please refer to the submitted boundary treatments prepared by Gannon & Associates Landscape Architects.</p> <p>The public open spaces will be publicly accessible and crossings to these spaces will be denoted by a change in the surface treatment – refer to the submitted landscape design rationale for details.</p>
QDP6 Objective 9	<i>To ensure, in cooperation with the NTA and relevant agencies, that projects which affect the public realm will consider fully the needs of pedestrian, cyclists and public transport users, and that transport schemes complement any public realm objectives.</i>	The proposed development caters for pedestrian and cyclist links throughout the scheme, including dedicated paths along the main routes. The proposed path network follows desire lines and affords ease of access to nearby public transport services.
Policy QDP7: High Quality Design – Development General	<i>Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.</i>	The application is designed in accordance with the relevant S.28 Ministerial Guidelines as assessed under the preceding section 5 of this Statement. The submitted Architectural & Urban Design Statement provides details of the design concept and principles of urban design applied to the overall proposed development.

QDP7 Objective 1	<i>To actively promote high quality design through the policies and objectives which form 'The Plan Approach' to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County's Building Height and Density Guide.</i>	The scheme has regard to the eight key design principles with details of same set out in section 7.2.3 of this Statement, and section 4.1.5.1 of the submitted Planning Statement.
QDP7 Objective 2	<i>To actively promote well-designed streets and public spaces that provide for active frontages and 'live' edges that feel safe, secure and attractive for all to use.</i>	Please refer to the submitted Architectural & Urban Design Statement for details. Streets areas are fronted by dwellings and the creche, creating safe, active streets.
QDP7 Objective 5	<i>To ensure that development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines on Quality Housing for Sustainable Communities, DEHLG (2007), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), or any superseding guidelines, including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009)</i>	Section 5 of this Statement demonstrates the proposed development's compliance with each of these documents – please refer to same. It is noted that the 2009 Sustainable Residential Development Guidelines are now replaced by the 2024 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, which are assessed previously in this report.
QDP7 Objective 6	<i>To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2019).</i>	The application is designed in accordance with DMURS, which is confirmed by Pinnacle Consulting Engineers in their submitted statement of compliance with DMURS – please refer to same.
QDP7 Objective 7	<i>To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County's Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).</i>	<p>The relatively low level heights of the proposed buildings and carefully consideration of appropriate height relative to site's topography take into account the locational context of the subject site on the edge of the built up area and its topography. The buildings provide an appropriate sense of enclosure to the streets while ensuring all open spaces are overlooked.</p> <p>The application is designed in accordance with DMURS, which is confirmed by Pinnacle Consulting Engineers in their submitted DMURS Statement of Compliance – please refer to same.</p>

		<p>Please also refer to the enclosed Daylight/Sunlight assessment prepared by Digital Dimensions</p> <p>As the buildings are only 5 storeys max and have been carefully considered on terms of positioning, separation distances and interrelationship, there will be limited, if any, impact on the micro climate within the area.</p>
QDP7 Objective 8	<i>To promote and support a Universal Design Approach to residential and non-residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES. (See also Chapter 8: Community Infrastructure and Open Space).</i>	Particular emphasis was placed in the detailed design stage on how walkable the scheme is for people of all abilities and ages. The set of guidance in 'Building for Everyone. A Universal Design Approach' is a design manual that the Design Team is fully familiar with and that have informed detailed design decisions based on the baseline set out in the planning design.
QDP7 Objective 9	<i>To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in South Dublin County's Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide (2009) and the guidance on Lifetime Homes as set out in the Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).</i>	<p>The proposed dwellings, particularly the proposed houses, in the proposed development, are adaptable. It is noted that the 2009 Sustainable Residential Development Guidelines, and its Urban Design Manual are now replaced by the 2024 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, which are assessed previously in this report.</p> <p>The sizes of the houses all meet or exceed the minimum standards of the Quality Housing and Sustainable Communities – Best Practice Guidelines, as demonstrated in the HQA submitted with this LRD planning application.</p>

QDP7 Objective 10	<i>To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i>	The proposed dwellings have been designed to accord with the principles of universal design. Refer to the Architectural & Urban Design Statement for further elaboration of this point.
QDP7 Objective 11	<i>To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county.</i>	A variety of apartments and duplexes are proposed with a broad range of unit sizes. The submitted Planning Statement provides details of the proposed housing mix with a separate HQA also enclosed as standalone document. Significant public open space is provided across the entire scheme incorporating SUDS, promoting biodiversity, and providing residential amenity.
QDP7 Objective 12	<i>To develop a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and / or mobility impairments and based on the principles of universal design.</i>	A series of footpaths are proposed throughout the proposed development which will be accessible to all and based on the principles of universal design and compliant with Part M of the Building Regulations. Please also refer to the submitted Site Access Universal Statement prepared by OHAC.
Policy QDP8: High Quality Design – Building Height and Density Guide (BHDG)	<i>Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County's Building Heights and Density Guide 2021.</i>	This is noted. The proposed buildings range in height from 2 to 5 storeys max and the development is in line with, and takes full account of, the topography of the site and reflecting urban design considerations for the development. Therefore, it is fully compliant with this policy. Adherence to the requirements set out in the Urban Development and Building Height Guidelines is set out under section 5.2 of this Statement.
QDP8 Objective 1	<i>To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000</i>	The proposed development has had regard to the planning policy framework as set out in the Building Height Guidelines and National Planning Framework. The provision of residential development at this location is supported by the Building Height Guidelines which encourages increased density and building heights at such locations, having regard in particular to the

	<p><i>sq.m or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 12: Implementation and Monitoring).</i></p>	<p>proximity of public transport. The proposed development complies with such objectives therefore is considered to be in accordance with the provisions of national policy guidelines.</p> <p>This LRD planning application is accompanied by an Architectural Design Statement which also sets out how the proposed development accords with the principles and performance-based design criteria set out in South Dublin County's Height and Density Guide – please refer to same.</p> <p>Section 5.5 of this Statement sets out the proposed development's compliance with the Sustainable Residential Development and Compact Settlements Guidelines (2024) with the proposed development achieving a net density of 50 units per hectare across the entire site.</p>
QDP8 Objective 2	<p><i>In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.</i></p>	<p>The max height of the proposed development is 5 storeys, however, the height within the wider area varies single and two storeys in the immediate area at the Carrigmore and Corbally and Verschoyle housing estates, to 6/7 storeys in the vicinity of the Luas stop a short distance away.</p> <p>The site has been assessed against the criteria in the 2024 Sustainable Residential Development and Compact Settlements Guidelines and the Building Height Guidelines and has been shown to be fully in accordance with same.</p> <p>All of the foregoing combines to enhance the legibility of the area in accordance with best practice guidelines.</p>

Policy QDP9: High Quality Design – Building Height and Density	<i>Apply a context driven approach to building heights in South Dublin, as supported by South Dublin's Building Heights and Density Guide.</i>	The proposed development's building height has been developed in a context driven approach, whereby judicious consideration has been paid to the character of the receiving environs, the location of the site at the edge of the built-up urban area, as well as the site topography. Based upon the forgoing, maximum heights of 5 storeys are proposed and considered appropriate at this location.
QDP9 Objective 1	<i>To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.</i>	Verified views and CGIs accompany this LRD planning application, as well as a Landscape and Visual Impact Assessment that is contained in the submitted EIAR (Chapter 11).
Policy QDP10: Mix of Dwelling Types	<i>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</i>	There is a mixture of units from 1 to 3 bed apartments and duplex units, and 2, 3, 4 and 4/5 bedroom houses, thus providing a variety of sizes and shapes for future homes.
QDP10 Objective 1	<i>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</i>	The proposed mix of dwelling types will cater for all household sizes and formations, from starter homes, family homes and catering for those who may wish to downsize. Refer to section 7.7 of the submitted Planning Statement for full details. A HQA is also enclosed with this LRD planning application.
QDP10 Objective 2	<i>To ensure that our ageing society is catered for in a choice of housing provision having regard to South Dublin Age Friendly County Strategy and Age Friendly Ireland's Principle and Guidelines for the Planning Authority (2021).</i>	
Policy QDP11: Materials, Colours and Textures	<i>Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency</i>	Refer to the submitted Architectural & Urban Design Statement for details on the design of the proposed dwellings and creation of distinct character areas within the overall development.
QDP11 Objective 1	<i>To require the use of high quality and durable materials and finishes that make a positive contribution to placemaking.</i>	The building materials proposed for use on external elevations and roofs have zero to low active maintenance requirements. Building materials proposed for use in the public realm achieve
QDP11 Objective 2	<i>To promote the use of structural materials that have low to zero embodied energy and CO2 emissions and</i>	

	<i>ensure a wood-first policy on public buildings funded or part-funded by the Council.</i>	a durable standard of quality that will not need regular fabric replacement or maintenance outside general day to day care. The buildings have been designed to nZEB (Near Zero Energy Building) standards and energy costs will be significantly lower than would have been the case in the past. Details of the proposed materiality are set out in the enclosed Architectural & Urban Design Statement.
QDP11 Objective 3	<i>To promote the reuse and recycling of materials to promote the circular economy and reduce construction and demolition waste</i>	The construction of the development will lead to the generation of waste. The key to minimising the production of waste is to implement the waste hierarchy of Prevent, Reuse, Recycle, Recover and Dispose. The Contractor(s) will apply the principles in "Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects" to reduce the number of materials used thereby minimising use of natural resources and reducing costs.
QDP14 Objective 1	<i>To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines.</i>	The Fortunestown Local Area Plan (LAP) has expired and is no longer operative. Whilst the proposed development will now be assessed against the terms of the County Development Plan only, in addition to relevant national and regional planning policy, the LAP has also been taken into account in the formulation of the development proposals, with some objectives from the previous LAP incorporated into the CDP, and compliance with same set out in preceding sections of this Statement, namely section 7.2.3.
Policy QDP14	Local Area Plans (LAP) (and its related objectives) – Prepare Local Area Plans as appropriate, prioritising areas that are likely to experience large scale residential or commercial development or regeneration.	It is evident that from the submitted drawings, sections, proposed site layout plan and building heights etc., that the proposed development has been judiciously considered in terms of its assimilation into the site and receiving environs.

Table 2 - Consistency with the South Dublin CDP Chapter 5.

Housing

Chapter 6 of the existing CDP contains the policies/objectives for new Housing within the county. The following policies/objectives set out in Chapter 6 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy H1: Housing Strategy and Interim Housing Need and Demand Assessment	<i>Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review.</i>	The proposed development is in line with the South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028.
H1 Objective 1	<i>To ensure adequate and appropriate land is zoned to facilitate and implement the aims of the Core Strategy, to deliver affordable sustainable development, and to meet forecast future housing need in the County over the life of the Plan as identified by the Housing Strategy and Interim HNDA</i>	<p>The CDP identifies that almost 15,500 new homes are required by the end of 2028, therefore the current proposal of 611 no. units will contribute to same, with the CDP's Core Strategy accommodating the proposed housing.</p> <p>In line with Part V of the Planning and Development Act, 2000 (as amended) the proposed development provides for 20% Social & Affordable housing units. Therefore, 123 no. units will be made available as social & affordable housing units.</p> <p>The proposed development aligns with the New Residential zoning status attributed to these lands and represents a sustainable and efficient use of zoned land at this strategic location.</p>
H1 Objective 2	<i>To require that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable</i>	<p>In line with Part V of the Planning and Development Act, 2000 (as amended) the proposed development includes 20% Social & Affordable housing units. Therefore, 123 no. units will be made available as social & affordable housing units.</p> <p>The proposed development aligns with the New Residential zoning status attributed to these lands and represents a</p>

	<i>Housing Act 2021 and the Planning and Development Act 2000 (as amended).</i>	sustainable and efficient use of zoned land at this strategic location.
H1 Objective 3	<i>To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.</i>	The proposed development will provide a mix of housing types suitable for a variety of people. The application comprises a sustainable mix apartments/duplex, ranging from 1-bed apartments up to 4/5 bedroom typologies.
H1 Objective 4	<i>To recognise the urgent need for the increased provision of social and affordable housing to ensure that all residents in South Dublin County have access to a home. Such provision shall be made through working with approved housing bodies and co-operatives to provide for social and genuinely affordable housing accommodation to meet housing needs. This shall be carried out through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, cost rental leasing, and housing supports including RAS and HAP or any other mechanism promoted under Government Housing Policy, with priority given to new builds and renovations whenever available.</i>	The scheme overall aims to provide a significant mix of tenures. A formal Part V agreement will be made with SDCC Housing post-planning.
H1 Objective 5	<i>To ensure the selection of land or housing units to purchase or lease by the Council, including Part V, promotes the development of sustainable and mixed income communities.</i>	The Applicants enclose a Part V proposal for consideration, and a formal Part V agreement will be made with SDCC Housing post-planning.
H1 Objective 6	<i>To provide social and affordable housing over the Plan period to meet forecast future housing need as identified in the Housing Strategy and interim HNDA</i>	

H1 Objective 7	<i>To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries suited to their strategic regional role, subject to good design and development management standards being met</i>	The subject site is located within the Dublin City and Suburbs as identified on the CDP's Core Strategy Map (Figure 10). As such, the proposed development will deliver 611 no. units at an appropriate density of c. 50 units per hectare which will ensure that the increase in population is met.
H1 Objective 12	<i>Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that: à there are unique site constraints that would prevent such provision; or à that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or à the scheme is a social and / or affordable housing scheme.</i>	53% (321 no.) of the units proposed within this development are attributed to 3-bedroom units consisting of houses, apartments and duplex units.
H1 Objective 13	<i>To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i>	The proposed development is a mixed tenure proposal which includes a Part V proposal, the details of which will be formally agreed with the SDCC Housing Department post planning.
H1 Objective 14	<i>To facilitate, as far as possible, the development of homes for owner-occupiers over institutional investors.</i>	This is noted.

Policy H2: Supply of Housing	<i>Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.</i>	The proposed development will provide residential units on a zoned, greenfield site that has been identified in the CDP as being a "Housing Capacity Site" (Figure 9 of the CDP).
H2 Objective 2	<i>To ensure that sufficient zoned land, integrating land use and transport and which can be serviced is available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing lands based on the Settlement Strategy outlined in Chapter 2: Core Strategy and Settlement Strategy.</i>	<p>The proposed residential scheme is on zoned land and is in line with the land use zoning objectives set out in the Development Plan.</p> <p>The proposed development is a high quality residential development located in close proximity to existing bus and Luas transport services and delivering a scale of density which reflects its location and character, in accordance with the approach to density advocated in national and regional policy. It will provide an alternative to unsustainable patterns of car-dependent residential development.</p> <p>The development will provide 611 no. units that will help in meeting growth targets for the Citywest area as set out in Table 11: Core Strategy.</p>
H2 Objective 4	<i>To promote lifetime housing standards in new homes built in the County in accordance with best practice.</i>	<p>The proposed housing has incorporated lifetime housing standards to ensure homes are more easily adaptable for lifetime.</p> <p>The proposed development is designed to the nearly zero energy building (NZEB) standard at a high level of energy efficiency minimising the use of natural resources (energy and water). NZEB compliant buildings generally achieve a BER of A2-A3.</p> <p>The design and layout of the proposed development will meet the requirements of all relevant documents, in particular Part M of the Technical Guidance Documents which deal with accessibility and inclusivity. In this regard, the design of the</p>

		<p>proposed development is also guided by the principles of universal design.</p> <p>The proposed scheme has been designed so that it can be accessed and used to the greatest extent possible by all people regardless of their age, size, ability, or desirability.</p>
H2 Objective 6	<i>To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</i>	A Part V proposal is submitted with this planning application and can be the subject of subsequent agreement on receipt of planning permission.
Policy H3: Housing for All	<i>Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.</i>	<p>The proposed development will provide for duplex and apartment units which will introduce a new type of development within a largely low density residential area. It will provide a new housing choice within this area. All of the units are designed in line with Part M and the Apartment Guidelines.</p> <p>It also includes a number of own door access one and two bedroom units, which can be used as step-down units for older persons.</p>
H3 Objective 1	<i>To support housing that is designed for older persons and persons with disabilities and / or mental health issues in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</i>	All of the apartment types are designed as suitable for older people, people with disabilities and/or mental health issues. The proposed housing development is in close proximity to existing services and amenities including pedestrian paths, local shops, parks and public transport.

H3 Objective 2	<i>To support housing options for older persons and persons with disabilities and / or mental health issues – consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES</i>	All of the apartment types are designed as suitable for older people, people with disabilities and/or mental health issues.
H3 Objective 7	<i>To ensure that those with specific housing needs, such as older persons, persons with disabilities, homeless persons, Travellers and people leaving Direct Provision, are accommodated in a manner appropriate to their specific needs and in a timely fashion.</i>	The application is designed in accordance with government policy, particularly the S.28 Ministerial Guidelines, as detailed / assessed in earlier in this Statement. Therefore, the scheme caters for various needs in order to develop and support a sustainable community for all residents.
H3 Objective 8	<i>To support and facilitate the implementation of the South Dublin Age Friendly Strategy 2020-2024, the National Age Friendly Programme, and Housing Options for Our Ageing Population 2019 and having regard to Age Friendly Ireland's guidelines for Planning Authorities (2021).</i>	All of the apartment types are designed as suitable for older people.
Policy Residential Design and Layout	H7: <i>Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.</i>	The layout, footprint of buildings and all amenity and landscaping proposed as part of the proposed development has been designed in compliance with the provisions of the relevant Section 28 guidance, as detailed in section 5 of this Statement and the submitted Architectural & Urban Design Statement.
H7 Objective 1	<i>To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), or</i>	The proposal has been designed in compliance with the provisions of: <ul style="list-style-type: none"> ▪ Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), ▪ Design Standards for New Apartments, Guidelines for Planning Authorities (2023), ▪ Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025), ▪ the Design Manual for Urban Roads and Streets as outlined in Section 5 of this Statement.

	<i>as may be updated and Chapter 12: Implementation and Monitoring.</i>	
H7 Objective 2	<i>To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.</i>	<p>The proposed development has been designed in accordance with Part L of the Building Regulations.</p> <p>The proposed development seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current Building Regulations.</p>
H7 Objective 3	<i>To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling, having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</i>	<p>The proposal includes a reduced car parking provision to support more sustainable transport modes and to encourage a transition away from car dependency.</p> <p>The proposed streets have been designed in accordance with DMURS as confirmed in the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers – please refer to same.</p>
H7 Objective 4	<i>To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013, updated 2019).</i>	<p>The proposal includes a reduced car parking provision to support more sustainable transport modes and to encourage a transition away from car dependency.</p> <p>The proposed streets have been designed in accordance with DMURS as confirmed in the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers – please refer to same.</p>
Policy H8: Public Open Space	<i>Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation</i>	The proposed open spaces will contribute to the green infrastructure network in the area, and the public open space provision is varied and based on a clear hierarchy of

	<i>and enhances the visual character, identity and amenity of the area.</i>	<p>connected spaces. Refer to the landscape design rationale by Gannon & Associates for further detail.</p> <p>The public open spaces will provide both recreational space for the residents and space for the local biodiversity to thrive.</p> <p>The communal, public, and private open spaces will all be clearly defined by hard and soft landscaping. All of these open spaces will be overlooked by the apartment / duplex blocks, providing passive surveillance, and creating a sense of safety.</p> <p>In addition, communal amenity space will be provided for the apartment buildings and duplex units.</p>
H8 Objective 1	<i>To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Open Space and Chapter 12: Implementation and Monitoring</i>	<p>The proposed open spaces will contribute to the green infrastructure network in the area.</p> <p>C. 2.3 Ha of public open space is provided for across the entire site which equates to c.19% of the net developable area overall site area.</p> <p>The public open spaces will provide both recreational space for the residents and space for the local biodiversity to thrive.</p> <p>The communal, public, and private open spaces will all be clearly defined by hard and soft landscaping. All of these open spaces will be overlooked by the apartment / duplex blocks, providing passive surveillance, and creating a sense of safety.</p>
H8 Objective 2	<i>To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.</i>	<p>The proposed open spaces will contribute to the green infrastructure network in the area and the public open space provision is varied and based on a clear hierarchy of connected spaces.</p>

		<p>The public open spaces will provide both recreational space for the residents and space for the local biodiversity to thrive.</p> <p>A clear distinction of open space is provided for.</p> <p>Refer to the landscape design rationale by Gannon & Associates for further detail.</p>
H8 Objective 3	<p><i>To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.</i></p>	<p>The proposed development fully meets the required public open space provision. It is therefore not necessary for the proposed development to contribute to the upgrade of other spaces outside the application site.</p> <p>It is further noted that SDCC have approved a Part 8 scheme on the 11th December 2023. The Part 8 approves extensive upgrades to the facilities at Carrigmore Park including the following:</p> <ul style="list-style-type: none"> ▪ Provision of a pump track and calisthenics area. ▪ Provision of a boules court/active age area. ▪ Upgrading of existing footpaths, to involve the removal and realignment of existing paths. ▪ Installation of goal posts onto existing soccer pitch. ▪ The provision of a new sports pitch area (65m x 40m). ▪ Planting of a mini woodland for enhanced biodiversity.
Policy H9: Private and Semi-Private Open Space	<p><i>Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.</i></p>	<p>All of the proposed dwellings have private open spaces. Houses have private rear gardens, while apartments and duplexes all have private balconies/terraces.</p>

H9 Objective 1	<i>To ensure that all private open spaces for houses and apartments / duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out in Chapter 12: Implementation and Monitoring.</i>	All dwellings either meet or exceed the minimum standards outlined in Section 28 Apartment Guidelines and chapter 12. The design, location and orientation of the rare gardens/balconies/terraces also ensures high qualitative standards are achieved.
H9 Objective 2	<i>To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.</i>	The apartment/duplex blocks have direct access to a dedicated communal open space area that exceeds the minimum size standards.
Policy Internal Residential Accommodation H10:	<i>Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.</i>	<p>The proposed development and all proposed residential units have been designed in accordance with both the 2023 and 2025 Apartment Guidelines and all relevant guidance. Regard has also been had to the standards for compact housing as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024.</p> <p>The residential units have been carefully located to provide both high-quality internal and external environments.</p> <p>The submitted Housing Quality Assessment (HQA) demonstrates the size and quality of the proposed dwellings.</p>
H10 Objective 1	<i>To promote the provision of high-quality houses and apartments / duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 12: Implementation and Monitoring</i>	The application is designed in accordance with these S.28 Ministerial Guidelines and chapter 12.
H10 Objective 2	<i>To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity</i>	The design approach routes, entrances and accommodation within the proposed units incorporate the provisions of Building Regulations Part M access and use.

H10 Objective 3	<i>To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.</i>	The proposed units all meet or exceed the standards as proposed under the County Development Plan/Apartment Guidelines and can be adapted to accommodate a home office.
Policy Privacy and Security	H11: <i>Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</i>	<p>All public and communal open spaces are overlooked by the apartment /duplex blocks, housing units, and duplexes. This will provide a high sense of security for both residents and visitors to the area.</p> <p>The private open spaces have all been carefully located to avoid possible overlooking. There is a clear definition between public and private open space which serve residents of the scheme.</p>
H11 Objective 1	<i>To ensure there is a clear definition and delineation between private, semiprivate (communal) and the public open spaces that serve residential development.</i>	A clear definition between public, semi-private and private open spaces is achieved – as illustrated in the submitted landscape design proposals.
H11 Objective 2	<i>To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.</i>	All residential streets will be fronted by residential development which will provide ample surveillance.
H11 Objective 3	<i>To ensure that private open spaces, where it consists of gardens, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</i>	This is achieved within the proposed development. Please refer to the enclosed architectural and landscape drawings and reports for further details.

H11 Objective 4	<i>To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity</i>	The large size of the site affords generous and sufficient distances between duplex and apartment blocks to be achieved. Refer to the submitted site layout plan for details.
Policy H12: Steep or Varying Topography Sites	<i>Ensure that development on lands with a steep and / or varying topography is designed and sited to minimise impacts on the natural slope of the site.</i>	<p>The proposed design and layout have been fully informed by the topography of the site, and judicious consideration has been paid to this, given the locational context of the subject site. This is demonstrated in the various site sections that are submitted.</p> <p>It is evident from the site sections, and the proposed building heights, that the proposed development can be successfully assimilated into the receiving environs. The design of the scheme is further elaborated in the enclosed Architectural & Urban Design Statement prepared by MCORM & DSA Architects and the Landscape Design Rationale prepared by Gannon & Associates – please refer to both documents.</p>
H12 Objective 1	<i>To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).</i>	<p>The proposed design and layout have been fully informed by the topography of the site. The site slopes up to the south.</p> <p>It is evident from the submitted site layout plan and landscape design strategy that the proposed development responds to the site, surrounding and landscape character in the area. For example, the height strategy has been carefully cognisant of the site topography, focusing taller buildings on the lower parts of the site. Lower height and density development has been proposed to the southern part of the site, at higher topography and adjacent to the more rural character of Boherboy Road.</p>
H12 Objective 2	<i>To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography.</i>	<p>The design of the scheme is further elaborated in the Architectural & Urban Design Statement prepared by MCORM & DSA Architects.</p>

		<p>Careful consideration has been given to the balancing of the cut and fill elements to reduce as much as is reasonably possible excavations necessary to create a useable and practical development on a steeply sloped site. The site road and block levels have been designed to follow as closely as reasonably possible the existing site levels and the housing layouts are placed parallel across the contours with stepped blocks following the downward slope of the site. The architectural drawings submitted include site sections illustrating how the housing cells are designed to accommodate the stepped levels where necessary. In addition, we refer the reader to the enclosed Site Universal Access Statement prepared by OHAC which ensures all of the site is accessible.</p> <p>A number of the housing cells on the steeper parts of the site have been designed as split-level units incorporating 3 storey on one elevation and 2 storey on the opposite as a solution to reduce the visual impact and improve access in locations where the drop in level across housing cells is unavoidable.</p> <p>Tiered back gardens further reduce the requirement for retaining elements but given the c.37-38m vertical drop along the site, garden boundary retaining walls are inevitable but are reduced to a minimum where feasible. Reference can be made to the Gannon & Associates Landscape drawings for further illustration of the proposed solutions considered</p>
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Table 3: Consistency with the South Dublin CDP Chapter 6.

Sustainable Movement

Chapter 7 of the existing CDP contains the policies/objectives for Sustainable Movement within the county. The following policies/objectives set out in Chapter 7 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy SM1: Overarching – Transport and Movement	<i>Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods</i>	The proposed site layout has been designed to promote active travel from this development including significant new linkages and connectivity with existing public transport, services and facilities, as well as internal pedestrian and cyclist prioritisation throughout the development. The site is also highly permeable allowing ease of access through the site to public transport services.
SM1 Objective 1	<i>To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car / Van / HGV / Motorcycle).</i>	
SM1 Objective 4	<i>To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP.</i>	The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the residential development and adjoining lands. These will provide more direct access to local services and public transport.
SM1 Objective 5	<i>To ensure that future development is planned and designed in a manner that maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned, and to protect and maintain regional accessibility, in accordance with RPO 8.3 of the RSES.</i>	
Policy SM2: Walking and Cycling	<i>Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift</i>	

	<i>to active travel for people of all ages and abilities, in line with the County targets</i>	The scheme incorporates multiple cycle and pedestrian provisions, prioritising this form of transports thus encouraging this more sustainable form of transport.
SM2 Objective 3	<i>To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.</i>	The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the residential development and adjoining lands. These will provide more direct access to local services and public transport.
SM2 Objective 4	<i>To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities through filtered permeability, while also taking account of existing patterns of anti-social behaviour in the removal of such barriers with due consideration of consultation with local residents where need is evident or expressed.</i>	<p>The routes are also overlooked by adjoining residential developments and a safe environment will be created.</p> <p>Please refer to the submitted architect's site layout plan, landscape plans and engineering layout plans to identify the proposed pedestrian and cycle paths/routes throughout the development.</p>
SM2 Objective 5	<i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets (2013; updated 2019) so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i>	The submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers confirms that the proposed development is DMURS compliant. Numerous pedestrian and cyclist paths throughout the entire development are proposed, in addition to dedicated paths along the proposed east-west link street, all of which prioritises cyclists and pedestrians around the development enabling them to travel safely.
SM2 Objective 6	<i>To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to</i>	The proposed development adheres to standards set out in the National Cycle Manual – refer also to the submitted DMURS

	<i>promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</i>	Statement of Compliance prepared by Pinnacle Consulting Engineers.
SM2 Objective 13	<i>To ensure that new walking and cycling routes are designed, insofar as possible, to function as links in the County's green infrastructure network and that adequate replacement and additional planting of native species and pollinators is provided, and that SuDS approaches are used to deal with surface water run-off.</i>	The green infrastructure within the site includes pedestrian and cyclist routes only through the site, walking tracks through the open spaces and paths that may connect to adjoining open spaces, particularly noting new linkages to the east/north-east into Carrigmore Park, thus reinforcing green infrastructure links.
SM2 Objective 14	<i>To ensure that all walking and cycling routes have regard to environmental conditions and sensitivities including biodiversity, protected species and designated sites and to incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</i>	Walking and cycle routes have been designed to seamlessly blend in with landscaping of the scheme – refer to the submitted landscaping drawings and design rationale prepared by Gannon & Associates Landscape Architects for more details. Significant public open space will be provided across the entire scheme incorporating SuDS, promoting biodiversity, and providing residential amenity.
SM2 Objective 16	<i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the National Disability Inclusion Strategy (NDIS) 2017-2022.</i>	The proposed streets have been designed in accordance with the principles, approaches and standards contained in the NDIS.
SM2 Objective 17	<i>To support bike parking provision at villages, centres, parks and any other areas of interest, as well as near public transport nodes to support multi-modal transport options</i>	Bicycle parking has been incorporated throughout the proposed scheme, in accordance with the relevant standards.
Policy SM3: Public Transport – General	<i>Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.</i>	The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to and through the development. These will provide more direct access to local services and public transport services.

		A car parking ratio of c. 1.45 is achieved for the scheme overall, with a total of 861 car parking spaces will be provided, comprising 854 no. residential spaces, 7 spaces for the crèche to serve the proposed development. Justification for the proposed parking standard is outlined in the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers – refer to same.
SM3 Objective 3	<i>To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.</i>	The development supports the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
SM3 Objective 4	<i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops</i>	The proposed design seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of multiple access points to the residential development and adjoining lands. These will provide more direct access to local services and public transport services.
SM3 Objective 5	<i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i>	The overall site layout plan, including pedestrian and cyclist paths provide an appropriate form of permeability and connectivity throughout the proposed development to the surrounding environs.
SM3 Objective 6	<i>To establish future public transport routes that will support the County's medium to long term development, including new and / or enhanced orbital routes to provide connectivity between outer suburban areas</i>	The proposed connectivity to adjacent existing pedestrian and cyclist routes will allow for desire lines from the proposed development to public transport and services and facilities to be achieved.

SM3 Objective 9	<i>To ensure that all new public transport corridors are designed to enhance the County's green infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</i>	The proposed development, including significant new internal routes and connectivity to existing external routes leading to public transport, incorporates appropriate SuDS measures.
SM3 Objective 10	<i>To work with the relevant transport agencies to ensure that all public transport proposals have regard to pertaining environmental conditions and sensitivities including biodiversity, protected species and designated sites and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</i>	This LRD planning application is accompanied by an EIAR which has assessed all relevant environmental impacts of the proposed development, including traffic impacts – please refer to same.
SM3 Objective 12	<i>To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle</i>	The proposed development includes significant pedestrian and cycle routes which connect through adjacent developments to the north and east to link with public transport services, both bus and Luas.
SM3 Objective 18	<i>To liaise with bus service providers where new bus stop infrastructure is proposed in order to ensure facilities such as shelters and bins are included, where appropriate.</i>	No new bus infrastructure is proposed but rather the proposed development will assist with providing a critical mass which will sustain and ensure viability of public transport services, and perhaps where required, allow for the expansion of such services.
Policy Strategic Network	SM4: Road <i>Improve and, where necessary, expand the County-wide strategic road network to support economic</i>	Pinnacle Consulting Engineers have conducted a traffic model of the existing network and proposed links were created. Please refer to their submitted Traffic & Transport Assessment for more details.

	<i>development and provide access to new communities and new development areas.</i>	
SM4 Objective 2	<i>To facilitate and secure the implementation of major road projects as identified within the relevant strategies and plans for the Greater Dublin Area.</i>	<p>The CDP zoning map identifies a north-south and an east-west link, both six-year road objectives on the site. Table 7.5 of the County Development Plan refers to “<i>Formation of a strategic street network providing access to the Fortunestown LAP lands</i>”.</p> <p>The proposed development delivers these roads objectives on the subject site.</p>
SM4 Objective 4	<i>To ensure that developing areas have sufficient access to the County's road network</i>	Please refer to the submitted Pinnacle Consulting Engineers documents for information on connectivity to the existing road network.
SM4 Objective 5	<i>To support the provision of junction upgrades, where necessary, at key locations on the strategic road network.</i>	Please refer to the submitted Pinnacle Consulting Engineers documents for details on junction connections etc.
SM4 Objective 7	<i>To implement the Six Year Roads Programme set out under Table 7.5 and to work towards the implementation of the Medium to Long Term Roads Objectives under Table 7.6 where feasible and subject to funding.</i>	<p>The CDP zoning map identifies a north-south and an east-west link, both six-year road objectives on the site. Table 7.5 of the County Development Plan refers to “<i>Formation of a strategic street network providing access to the Fortunestown LAP lands</i>”.</p> <p>The proposed development delivers these roads objectives on the subject site.</p>
SM4 Objective 8	<i>To work with the relevant transport agencies to ensure that all road and street network proposals have regard to pertaining environmental conditions and sensitivities including biodiversity, protected species and designated sites and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</i>	The submitted EIAR (Chapter 14 – Material Assets: Transportation) demonstrates that all traffic and transport specifications have been addressed.

SM4 Objective 9	<i>To ensure that all new roads and streets are designed to enhance insofar as feasible, the County's green infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</i>	The scheme presents an integrated design approach that seeks to deliver a sustainable residential community connected by well-designed streets and attractive open spaces which together deliver safe, secure, convenient, and attractive networks, in addition to promoting a real and viable alternative to car-based journeys.
Policy SM5: Street and Road Design	<i>Ensure that streets and roads within the County are designed to balance the needs of all road users and promote placemaking, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.</i>	The layout of the site is designed to promote place making and sustainable movement and road safety including the prioritisation of active travel.
SM5 Objective 1	<i>To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that promotes active travel modes and public transport.</i>	The submitted Traffic & Transport Assessment and Architectural & Urban Design Statement confirm that the design presented for the proposed development has maximised every opportunity to ensure consistency with both the principles and design guidance outlined within the Design Manual for Urban Roads and Streets.
SM5 Objective 2	<i>To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (2013; updated 2019).</i>	A slow speed residential street network is provided throughout where pedestrians and cyclists will be able to travel safely.
SM5 Objective 5	<i>To design new roads and streets to incorporate green infrastructure elements such as planting of native trees, hedgerows and pollinator species in medians and on roadside verges, as appropriate to the location.</i>	The design minimises the impact of highway features by avoiding excessive signing, road markings and street furniture. Significant levels of enclosure along each street type are achieved by the building orientation and tree planting contribute to providing a more intimate and supervised street environment.
Policy Traffic SM6: and	<i>Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.</i>	All forms of travel, vehicular, pedestrian and cyclist are catered for throughout the development. Refer to the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers.

Transport Management		
SM6 Objective 3	<i>To minimise the impact of new development on the County's road and street network through prioritising active travel and public transport and implementing appropriate traffic and transport management measures.</i>	Please refer to the submitted Pinnacle Consulting Engineers documents for information on traffic and transport management measures.
SM6 Objective 8	<i>To require all major traffic generating development to submit a Mobility Management Plan / Workforce Plan and / or Traffic and Transport Assessment.</i>	Please refer to both the submitted reports: Traffic & Transport Assessment and Travel Plan, prepared by Pinnacle Consulting Engineers.
SM6 Objective 9	<i>To ensure that appropriate design and mitigation measures are applied to all transport schemes to reduce the impact of noise and air pollution within residential communities in accordance with the EU directive on Assessment and Management of Environmental Noise.</i>	The submitted EIAR - Chapter 12 – “Material Assets: Transportation” provides a list of appropriate mitigation measures which will be implemented throughout the scheme upon a grant of permission
SM6 Objective 10	<i>To prioritise traffic calming measures, where appropriate, and works needed to improve safety at road crossings.</i>	Pinnacle Consulting Engineers have adopted DMURS standard design approaches throughout the proposed development to ensure safety for all road users, as confirmed in their enclosed DMURS Statement of Compliance.
Policy SM7: Car Parking and EV Charging	<i>Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities</i>	Pinnacle Consulting Engineers have assessed the car parking and management of same in full in their enclosed Traffic & Transport Assessment.
SM7 Objective 1	<i>To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility.</i>	

SM7 Objective 5	<i>To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</i>	The provision of car parking considers the requirements of CDP and Apartment Guidelines. In summary, a total of 861 car parking spaces will be provided, comprising 854 no. residential spaces, 7 spaces for the crèche, to serve the proposed development. Provision of Electric Vehicle Charing Points is incorporated into the subject development car parking area. Dedicated EV spaces will be provided with ESB ducting for future potential use by electric vehicles.
SM7 Objective 9	<p><i>To ensure that car parking is designed in such a manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements:</i></p> <ul style="list-style-type: none"> ▪ <i>Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species;</i> ▪ <i>Provision of not more than two parallel or five perpendicular spaces between trees / planting bays;</i> ▪ <i>Use of permeable paving, where appropriate.</i> 	Please refer to the Site Layout Plan by MCORM Architects, the landscape architecture pack by Gannon & Associates and the Transport information prepared by Pinnacle Consulting Engineers. The proposed car parking is all at surface level and has been integrated into the landscaping of the site.
SM7 Objective 10	<i>To ensure that parking provision, including the provision of EV charging facilities, does not detract from the comfort and safety of pedestrians and cyclists, visual amenity or the character of an area (refer also to Chapter 10: Energy).</i>	Dedicated EV spaces will be provided with ESB ducting for future potential use by electric vehicles.
SM7 Objective 11	<i>To review and seek to improve the issue of on-street car parking in housing estates to eliminate any road safety or social issues they present, where issues of safety are clearly identified.</i>	Parking is provided at surface level in a mixture of on-curtilage spaces and on-street / groped parking arrangements. Throughout, the surface parking design is cognisant of the needs of pedestrians and cyclists.

		The incorporation of a slow speed residential roads/streets is provided to ensure that pedestrians and cyclists will be able to travel safely.
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Table 46: Consistency with the South Dublin CDP Chapter 7.

Community Infrastructure and Open Space

Chapter 8 of the existing CDP contains the policies/objectives for Community Infrastructure and Open Space within the county. The following policies/objectives set out in Chapter 8 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy COS1: Social Inclusion and Community Development	<i>Promote social inclusion and community development and encourage active participation and social integration of minority and marginalised groups, consistent with RPO 9.1 and RPO 9.2 of the RSES.</i>	The proposed development aims to provide a mix of housing both in terms of dwelling size, typology and tenures. The protection and further establishment of natural amenities throughout the scheme enhances this vision of social integration further by creating areas for socialising for residents and visitors to interact with their surrounding environment, providing key open spaces for the resident community, as well as the wider community.
COS1 Objective 1	<i>To provide appropriate and accessible community facilities to meet the needs of all citizens of the County, comprising of a fast-growing young population and including an ageing population, consistent with NPOs 28 and 30 of the NPF.</i>	The proposed development will provide new public open spaces, routes, and a creche. These facilities will serve the needs of the residents and the wider community for a range of people of all ages.
Policy COS2: Social / Community Infrastructure	<i>Support the planned provision of a range of universally accessible and well connected social, community, cultural and recreational facilities, close to the communities they serve, consistent with RPO</i>	The design of the proposed development has taken into account universal design principles, with all areas of the development accessible and user friendly, and in accordance with the Building Regulations (Part M).

	9.14 of the RSES. (See also Chapter 5: Quality Design and Healthy Placemaking)	
COS2 Objective 1	<i>To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for a period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes</i>	<p>The site also benefits from a high level of access to local amenities and services including employment centres, retail, education and healthcare facilities, as has been identified in the submitted Social Infrastructure Assessment (SIA).</p> <p>As agreed with South Dublin County Council, the Applicants will pay a development / financial contribution in lieu, which is intended to be used towards the provision of a new community facility for the Citywest area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.15 of the submitted Planning Statement for details.</p>
COS2 Objective 2	<i>To continue to work closely with the Health Service Executive, Department of Education and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.</i>	<p>The proposed development includes a creche (c. 630 sq.m) which will be appropriately sized to facilitate the predicted childcare demand of the proposed development.</p> <p>The proposal includes the reservation of a c.1.3 hectare site for a future school, as agreed in principle with the Department of Education.</p> <p>The proposed development includes new public open spaces as well as communal open spaces distributed throughout the development. A well-defined hierarchy of open space is provided for.</p>
COS2 Objective 3	<i>To protect and enhance existing community facilities, and to support the development and expansion of new and existing facilities and services, in proximity to the populations they serve, where their need is identified.</i>	The proposed development of 611 no. residential units will provide an increased local demand on existing community facilities. As a result, the contribution towards a new community facility, provision of a dedicated childcare facility reservation of a site for a potential new school and creation of new public open spaces will facilitate and serve the population of this development and the wider area

		The site also benefits from a high level of local amenities and services including employment centres, retail, education and healthcare facilities, as identified in the submitted Social Infrastructure Assessment (SIA).
COS2 Objective 4	<i>To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community hubs without negatively restricting the range of services provided in any one centre.</i>	As agreed with South Dublin County Council, the Applicants will pay a development / financial contribution in lieu, which is intended to be used towards the provision of a new community facility for the Citywest area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.15 of the submitted Planning Statement for details.
COS2 Objective 5	<i>To promote accessible and inclusive social infrastructure for a range of users by adopting a universal design approach where feasible and to provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives, consistent with RPO 9.12 and RPO 9.13 of the RSES and having regard to Building for Everyone: A Universal Design Approach – Planning and Policy' (2012).</i>	The proposed development has been designed for inclusivity by all, in accordance with relevant standards. Creating strong welcoming linkages along desire lines from the proposed development to nearby services and facilities is in accordance with this objective. Particular emphasis has been placed in detailed design stage on how walkable the scheme is for people of all abilities and ages.
COS2 Objective 6	<p><i>To ensure that social, community, cultural and recreational facilities are provided in a manner which reduces climate impact by supporting and promoting the following measures:</i></p> <ul style="list-style-type: none"> ▪ <i>Provision of facilities within walkable distances of communities and on public transport routes; à Promotion of walking and cycling and use of public transport via permeability and mobility management measures;</i> ▪ <i>Co-location, clustering and sharing of community facilities to increase efficient use and reduce trips;</i> 	<p>The prospective application site is within minutes walk of Citywest Shopping Centre, which provides neighbourhood level facilities including a Dunnes Stores supermarket and a range of other services. The clustering of services and facilities at Citywest Shopping Centre and the provision of new residential services within walking distance of these services and public transport is fully in accordance with the planning policy context.</p> <p>The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current Buildings Regulations.</p>

	<ul style="list-style-type: none"> ▪ Location, siting and design to promote climate mitigation and adaptation for example, taking advantage of solar gain; ▪ Sourcing power from renewables such as wind and solar energy; ▪ Use of alternative energy technologies such as heat pumps; ▪ Energy-proofing of community buildings; ▪ Additional tree planting and adapting management regimes in parks and public open spaces to allow more wild areas in order to increase opportunities for carbon sequestration. 	<p>In terms of accessibility, a well-designed and safe footpath network will circulate the development, link open spaces and invite residents and the wider community for leisure walks, cycling and jogging.</p> <p>The interconnectivity of the scheme will ensure access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme.</p> <p>The new open spaces will support additional tree planting and encourage more wild areas.</p>
Policy COS3: Community Centres	Ensure that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities	<p>As agreed with South Dublin County Council, the Applicants will pay a development / financial contribution in lieu, which is intended to be used towards the provision of a new community facility for the Citywest area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.15 of the submitted Planning Statement for details.</p> <p>The site also benefits from a high level of local amenities and services including employment centres, retail, education and healthcare facilities, as identified in the submitted Social Infrastructure Assessment (SIA).</p> <p>It is further noted that SDCC have approved a Part 8 scheme on 11th December 2023. The Part 8 approves extensive upgrades to</p>
COS3 Objective 1	To investigate, where new provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.	
COS3 Objective 2	To ensure the provision of new community centres in new and existing development areas or where provision is the responsibility of the developer, the Council will ensure the developer provides, in proximity to the population they serve and in accordance with the standard of one centre per 8,000 population with a size of approximately 1,200-1,800 sq m, or dependent on specific local demographic or other needs, smaller centres at a more local level, generally between 350-650 sq m in size at the discretion of the Council, or as may be	

	<i>updated by any future community centre strategy carried out by the Council.</i>	the facilities at Carrigmore Park including the following the provision of a new sports pitch area (65m x 40m).
COS3 Objective 3	<i>To provide discretion to the Council to require residential or mixed used developments in new development areas to provide a pro rata contribution towards the provision of a community centre, in accordance with the standards set out in COS3 Objective 2 and in line with the Development Contribution Scheme</i>	
COS3 Objective 4	<i>To ensure that community buildings are multi-functional and adaptable, can be used by all age cohorts (intergenerational), providing for indoor and supporting outdoor use, for example, café seating areas, and are accessible to as many different users as possible including our teens and young people.</i>	
COS3 Objective 6	<i>To support and facilitate the provision of community resource centres</i>	
Policy COS4: Sports Facilities and Centres	<i>Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable</i>	
COS4 Objective 2	<i>To promote public health policies including the Healthy Ireland Framework and National Physical Activity Plan consistent with NPO 26 of the NPF and RPO 9.16 of the RSES.</i>	The proposed development encourages a modal shift from car-based travel to sustainable transport modes which in return promotes a healthy lifestyle. This is achieved through strong pedestrian and cyclist linkages along desire lines, an appropriate level of car parking such to encourage walking and cycling, and sufficient bicycle parking storage and bicycle facilities to encourage cycling.
COS4 Objective 4	<i>To support and encourage the co-location and sharing of community and sporting facilities within the County where feasible. (See also COS8 Objective 8).</i>	The dispersion of public open spaces throughout the site has been carefully selected so that adjoining communities can benefit.

COS4 Objective 5	<i>To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated</i>	<p>The proposed landscape design provides for formal and informal / nature play, to provide dedicated play areas.</p> <p>The play areas are located in areas overlooked and passively supervised by the adjacent residential development and the footpath network.</p> <p>There is a variety of play provision catered for as part of the overall landscape design which includes:</p> <ul style="list-style-type: none"> ▪ 16 no. equipped and natural play areas ▪ 10 no. picnic and relax areas ▪ 4 no. fitness play areas.
COS4 Objective 6	<i>To facilitate the provision of appropriately scaled children's play facilities and teen space facilities at suitable locations across the County within existing and new residential development.</i>	Play for younger children and teens is designed into the scheme as detailed in the submitted landscape proposals by Gannon & Associates – please refer to same.
Policy COS5: Parks and Public Open Space – Overarching	<i>Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County.</i>	<p>The open space recreational network of the proposed development is designed for optimal access for all and to be inclusive of those who may not be able to afford access to gyms or classes. The path network includes for strong pedestrian and cycle link provision for active and sustainable movement for commuter and recreational use. Walking and jogging are promoted throughout the site with appropriate rest stops.</p> <p>There are at least six different areas of open space that provide for varying forms of recreation throughout the entire development, that are outside of designated buffers for biodiversity which protect watercourses, hedgerow, trees, sensitive boundaries etc. with over 3Ha of the site dedicated to being free from development in order to protect and enhance biodiversity/ecology on the site.</p>
COS5 Objective 1	<i>To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha per 1,000 population.</i>	

		This site provides c.19% of the net developable site area as public open space (c.2.34Ha), in addition to communal open spaces throughout the development.																		
COS5 Objective 4	<i>To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type set out in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha per 1,000 population, subject to the Regional Park meeting the open space 'accessibility from homes' standard set out in Table 8.1</i>	<p>Based upon the proposed 611 no. dwellings which will produce c.1,668 persons based on the average household size of 2.73 persons as stated at Section 2.5.6 of the County Development Plan. A more site-specific assessment of the population capacity of the proposed development based on actual typologies is as below:</p> <table border="1"> <thead> <tr> <th>Units</th><th>Ratio as per Section 12.6.10 of the CDP</th><th>No. of Persons</th></tr> </thead> <tbody> <tr> <td>1 bed: 57</td><td>1.5</td><td>85.5</td></tr> <tr> <td>2 bed: 200</td><td>1.5</td><td>300</td></tr> <tr> <td>3 bed: 321</td><td>3.5</td><td>1,123.5</td></tr> <tr> <td>4 & 4/5bed: 33</td><td>3.5</td><td>115.5</td></tr> <tr> <td colspan="2">Total</td><td>1,624.5</td></tr> </tbody> </table> <p>The proposed development will provide c.2.34 Ha of public open space.</p> <p>It is considered that Table 8.2 of the County Development Plan requires two minimum requirements relevant to the proposed development:</p> <ol style="list-style-type: none"> the overall minimum of 2.4 hectares per 1,000 population, and the 15% minimum for lands zones RES-N. <p>The proposed development meets the minimum 15% requirement for lands zoned RES-N by providing for 19% public open space on the net developable area of 12.2Ha. We note the discretion to impose a financial contribution in lieu of any remaining open</p>	Units	Ratio as per Section 12.6.10 of the CDP	No. of Persons	1 bed: 57	1.5	85.5	2 bed: 200	1.5	300	3 bed: 321	3.5	1,123.5	4 & 4/5bed: 33	3.5	115.5	Total		1,624.5
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3 bed: 321	3.5	1,123.5																		
4 & 4/5bed: 33	3.5	115.5																		
Total		1,624.5																		
COS5 Objective 5	<i>To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2. The Council has the discretion to accept a financial contribution in lieu of any remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, such contribution being held solely for the purpose of the</i>																			

	<p>acquisition or upgrading of small parks, local parks and neighbourhood parks subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type specified in Table 8.1. In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion to accept a financial contribution in lieu of the remaining open space requirement to allow provision or upgrade of Regional Parks, subject to the Regional Park meeting the open space 'accessibility from homes' standard specified in Table 8.1. Where the Council accepts financial contributions in lieu of open space, the total contribution shall be calculated on the basis of the costs set out in the applicable Development Contribution Scheme, in addition to the development costs of the open space.</p>	<p>space requirement to be held by the council for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks, and in exceptional circumstances to allow provision or upgrade of Regional Parks.</p> <p>The application site is subject to a number of significant constraints (all of which are outlined in the submitted Planning Statement) which demonstrates that circa 6.45 Ha of the subject site is undevelopable.</p> <p>In addition to the 19% public open space provision on site, over 3Ha of the site is reserved for biodiversity / ecological protection / enhancement.</p> <p>Notwithstanding the constraints on site, as well as the planning history attached to the site to achieve an appropriate density of development, along with the topography of the site, it is considered that the provision of 19% of public open space is appropriate and complies with the County Development Plan.</p> <p>It is considered that the County Development Plan requires either the proposed development meets the overall target for public open space provision, or a financial contribution in lieu. Therefore, the proposed development meets the minimum standard</p>																		
COS5 Objective 6	<p>To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</p>	<p>We refer to the calculations in the table below:</p> <table border="1"> <thead> <tr> <th>Units</th><th>Ratio as per Section 12.6.10 of the CDP</th><th>No. of Persons</th></tr> </thead> <tbody> <tr> <td>1 bed: 55</td><td>1.5</td><td>85.5</td></tr> <tr> <td>2 bed: 216</td><td>1.5</td><td>300</td></tr> <tr> <td>3 bed: 307</td><td>3.5</td><td>1,123.5</td></tr> <tr> <td>4 bed: 31</td><td>3.5</td><td>115.5</td></tr> <tr> <td colspan="2">Total</td><td>1,624.5</td></tr> </tbody> </table>	Units	Ratio as per Section 12.6.10 of the CDP	No. of Persons	1 bed: 55	1.5	85.5	2 bed: 216	1.5	300	3 bed: 307	3.5	1,123.5	4 bed: 31	3.5	115.5	Total		1,624.5
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COS5 Objective 8	<i>To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers: à provision of an appropriate mix of hard and soft surfaced areas; à enhancement of biodiversity and existing trees and hedgerows; à incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate; à provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.</i>	<p>The open space recreational network is designed for optimal access for all and to be inclusive for all.</p> <p>It has been designed to include active and passive spaces as well as incorporating the enhancement of biodiversity and water courses within the development.</p> <p>The open space network within the development will accommodate a range of recreational activities across different age groups.</p>
COS5 Objective 9	<i>To ensure that parks and public open space are appropriately located within the County and within development sites, to facilitate and support its multifunctional role</i>	Same as COS5 Objective 8 above.
COS5 Objective 10	<i>To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.</i>	<p>A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation. Green roofs are proposed for areas which will be overlooked and an extensive landscaping plan incorporating hard and soft surfaces is proposed.</p> <p>The landscape design includes plans of maintaining existing trees and hedgerows in those locations and moulded ground planes to provide play areas and sustainable drainage features.</p>
COS5 Objective 11	<i>To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National</i>	

	<i>Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021- 2025), the Council's Biodiversity Action Plan (2020-2026) or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.</i>	<p>An objective of the overall development is to adopt compensatory measures for the scheme, including the use of pollinator plants.</p> <p>Where possible the development will conserve trees and hedgerows on site to support biodiversity on site.</p> <p>The proposed open spaces will contribute to the green infrastructure network in the area, particularly the designated buffers along the eastern and western boundaries of the site, which follow the routes of the watercourses, respecting the riparian strips.</p>
COS5 Objective 12	<i>To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.</i>	Proposed SuDS measures are incorporated seamlessly into the landscaping of the proposed development.
COS5 Objective 13	<i>To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability.</i>	Opportunities are provided in the proposed development for people of all ages with different levels of mobility to interact with their surroundings as they rest in or meander through the parks.
COS5 Objective 14	<i>To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations</i>	The open space recreational network is designed for optimal access for all.
COS5 Objective 15	<i>To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity / hobbies, and visual interest.</i>	
COS5 Objective 16	<i>To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing</i>	Public open space is overlooked as far as practicable to achieve maximum passive surveillance.

	<i>the following measures: à Providing active frontages and maximising passive surveillance from adjacent housing and / or public thoroughfares; à Eliminating buildings which back-on or gable-front public open spaces; à Designing corner units with active frontage; à Encouraging increased use through improved access and quality of facilities'; à Careful location, design and choice of surface materials and site furniture</i>	
COS5 Objective 17	<i>To ensure that incidental areas of open space which do not function as useable open space and / or are not clearly visible from the public realm, are designed out of a proposed scheme.</i>	Noted. Open space calculations exclude those listed.
COS5 Objective 18	<i>To ensure that incidental areas of open space and areas immediately underneath high voltage electricity lines are not included in open space calculations.</i>	
COS5 Objective 19	<i>To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure playspaces and play facilities comply with universal design principles.</i>	<p>The proposed development incorporates play areas for all ages throughout the scheme. Open green spaces provide multi-functional areas for kickabouts as well as formal and informal play areas.</p> <p>The proposed landscaping design offers various play equipment as well as grass mounding/nature play for the interest of people of all ages.</p> <p>A range of materials, trees and shrubbery of different colour, form and texture, are incorporated within the landscape design of open spaces, play areas and walkways to provide visual interest all year round.</p> <p>Please refer to Gannon & Associates landscape documents for more details.</p>
COS5 Objective 20	<i>To ensure that children's play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in</i>	

	<i>accordance with the requirements set out in Chapter 12: Implementation and Monitoring.</i>	
COS5 Objective 25	<i>To continue to provide innovative play spaces, including sensory play areas and play trails, in parks and open spaces throughout the County and to identify the quietest and busiest times at SDCC playgrounds and share this information so it may be useful to visitors so they can identify quiet times and quieter playgrounds and plan their visits accordingly.</i>	<p>The chosen play elements throughout the play areas of the development will enable all ages play, exploration of sensory input, individual play, group play, and social interaction, imaginative play, climbing, spinning, and sliding movement.</p> <p>A range of materials, trees and shrubbery of different colour, form and texture, are incorporated within the landscape design of open spaces, play areas and walkways to provide visual interest all year round.</p>
COS5 Objective 28	<i>To deliver better accessibility for wheelchair users in parks, across all features (pathways, furniture, sensory and recreational amenities, and so on), including a check of compliance with universal design principles as part of the design process.</i>	The landscaping proposals have been designed to be accessible to all users of varying mobility, in accordance with universal design principles. Please also refer to the enclosed Site Universal Access Statement.
Policy COS7: Childcare Facilities	<i>Support and facilitate the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee.</i>	
COS7 Objective 1	<i>To support and facilitate the provision of childcare facilities on well located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF.</i>	<p>The proposed development includes a c.630 sq.m creche which is sized to cater for the predicted demand of c. 148 children from the development itself as well as potentially providing spaces for the existing wider community.</p> <p>The creche has been purposely sited to allow ease of access from the wider community should they wish to use it.</p>
COS7 Objective 2	<i>To require provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities (2001) or any superseding guidelines, or as required by the</i>	

	<i>Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity</i>	
COS7 Objective 3	<i>To require childcare facilities to be provided in new communities in tandem with the delivery of residential development and, where a Local Area Plan or Planning Scheme applies, in accordance with the phasing requirements of that plan / scheme</i>	
COS7 Objective 4	<i>To support investment in the sustainable development of the County's childcare services as an integral part of social infrastructure provision, including support of the Affordable Childcare Scheme; ensuring quality and supply of sufficient childcare places; and support of initiatives under a cross-Government Early Years Strategy, consistent with RPO 9.20 of the RSES.</i>	

Table 56: Consistency with the South Dublin CDP Chapter 8.

Energy

Chapter 10 of the existing CDP contains the policies/objectives for Energy within the county. The following policies/objectives set out in Chapter 10 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy E1: Responding to European, National and Regional Policy and Legislation	<i>Respond to the European, National and Regional Climate Action Programme and UN Sustainable Goal 13 through the integration of climate action policies and objectives which promote renewable energy and energy conservation and an increase in energy efficiency; Promote an increase in energy efficiency</i>	The proposal seeks to import best practice construction/engineering techniques and use of energy efficient

	<i>and the growth of locally based energy alternatives in an environmentally acceptable and sustainable manner.</i>	materials to maximise energy capacity and minimise impacts of climate change in accordance with current Buildings Regulations.
E2 Objective 1	<i>To seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development</i>	<p>The proposed development is designed to NZEB and will achieve a high level of energy efficiency by minimising the use of fossil fuels and associated emissions to the air.</p> <p>All units have been designed and orientated to maximise daylight and passive solar energy gains.</p> <p>Solar PV panels are being considered for incorporation onto suitable house types and apartment blocks, which support the transition to cleaner energy generation any aeronautical activity.</p> <p>Car parking spaces within the scheme are to be ducted for future electrical parking along with dedicated spaces to cater for EV charging.</p> <p>Particular account has been taken of the objectives of government policy on sustainability, including issues such as energy efficiency.</p>
Policy E3: Energy Performance in Existing and New Buildings	<i>Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.</i>	
E3 Objective 1	<i>To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings, and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance</i>	
E3 Objective 3	<i>To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.</i>	
Policy E4: Electric Vehicles	<i>Promote the delivery of EV charging facilities in accordance with relevant regulations and national and regional policy and guidance. (see also Chapter 7: Sustainable Movement and Chapter 12: Implementation and Monitoring)</i>	

E4 Objective 1	<i>To support the implementation of the EV charging strategy for the Dublin Region</i>	A Building Life Cycle Report and Energy & Sustainability Report are submitted as part of this LRD planning application – please refer to these standalone reports.
E4 Objective 2	<i>To ensure that EV charging points are installed such that they do not cause significant obstruction to lower carbon forms of transportation (that is, footpaths, cycle lanes, access to DART or Luas stations, or bus lanes / stops).</i>	
E7 Objective 8	<i>To support the installation of solar panels on up to 100% of residential roof space</i>	

Table 17: Consistency with the South Dublin CDP Chapter 10.

Infrastructure and Environmental Services

Chapter 11 of the existing CDP contains the policies/objectives for Infrastructure and Environmental Services within the county. The following policies/objectives set out in Chapter 11 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Policy/Objective	Provision	Proposed Development Consistency
Policy IE1: Overarching Policy	<i>Ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.</i>	<p>Please refer to the submitted drawings and documents prepared by Roger Mullarkey & Associates Consulting Engineers, Pinnacle Consulting Engineers and Gannon & Associates for details on the servicing and landscaping for the proposed development.</p> <p>This LRD application is also be accompanied by an EIAR which has considered the impacts of the proposed development on the environment – please refer to same.</p>

Policy IE2: Water Supply and Wastewater	<i>Ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to support growth in jobs over the lifetime of the Development Plan facilitating environmental protection and sustainable growth.</i>	Refer to the submitted drawings and documents prepared by Roger Mullarkey & Associates Consulting Engineers, which includes details of liaison with Uisce Éireann.
IE2 Objective 1	<i>To work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region.</i>	
IE2 Objective 3	<i>To promote and support the implementation of the Greater Dublin Strategic Drainage Study, Dublin Region Local Authorities (2005) GDSDS.</i>	The submitted engineering details demonstrate the various forms of SuDS proposals incorporated into the design of the proposed development. These have been married into the proposed landscaping design also.
IE2 Objective 7	<i>To promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice.</i>	Bio-retention rain gardens shall be utilized in selected private areas as small containment private planters, receiving runoff from private roofs.
IE2 Objective 8	<i>To ensure on-going liaison and consultation with Irish Water to ensure that the water services infrastructure for the planned growth of the County, in line with the County's Core Strategy, is integrated into the relevant plans and capital programmes and to ensure that the design and layout of water services is fully considered to deliver sustainable growth.</i>	<p>Whilst it is noted that this objective has a wider reach than a specific planning application, we confirm that consultation has been undertaken with Uisce Éireann in relation to the proposed development.</p> <p>For both water and wastewater, a Confirmation of Feasibility (CoF) was received (Ref. CDS24005491) from Uisce Éireann noting that the wastewater connection was "feasible subject to upgrades". A copy of the UÉ confirmation letter can be viewed in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report - please refer to same.</p>

IE2 Objective 9	<i>To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system.</i>	The proposed development will connect into the public sewerage system, in agreement with Uisce Éireann.
IE2 Objective 10	<i>To require all development proposals to provide a separate foul and surface water drainage system – where practicable.</i>	Strict separation of surface water and foul sewerage will be imposed on the development.
Policy IE3: Surface Water and Groundwater	<i>Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.</i>	The proposed development employs SuDS proposals.
IE3 Objective 1	<i>To maintain, improve and enhance the environmental and ecological quality of our surface waters and groundwater by implementing the relevant programme of measures set out in the River Basin Management Plans.</i>	This LRD application is accompanied by an Appropriate Assessment Screening Report and an EIAR, both of which have considered the drainage proposals for the subject development.
IE3 Objective 2	<i>To maintain and enhance existing surface water drainage systems in the County and to require Sustainable Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.2.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.</i>	The submitted engineering details demonstrate the various forms of SuDS proposals incorporated into the design of the proposed development. These have been married into the proposed landscaping design also.
IE3 Objective 3	<i>To protect the regionally and locally important aquifers within the County from risk of pollution.</i>	The proposed development employs SuDS proposals. This LRD application is accompanied by an Appropriate Assessment Screening Report and an EIAR, both of which have considered the drainage proposals for the subject development.
IE3 Objective 8	<i>Integrate Surface Water and Groundwater systems as an essential component of all new developments, in accordance with the requirements set out in Chapter</i>	The submitted engineering details demonstrate the various forms of SuDS proposals incorporated into the design of the proposed development. These have been married into the proposed landscaping design also.

	<i>12: Implementation and Monitoring and the policies and objectives of this chapter.</i>	
Policy IE4: Flood Risk	<i>Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.</i>	<p>A Site-Specific Flood Risk Assessment (SSFRA) is included as part of this LRD planning application, prepared by Kilgallen & Partners, Consulting Engineers. The SSFRA concludes: “The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective”.</p> <p>In accordance with the Flood Risk Management Guidelines, the proposed development is therefore appropriate from a flood risk perspective.</p>
IE4 Objective 1	<i>To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12 / 2014 and the EU Floods Directive and Chapter 12: Implementation and Monitoring and the policies and objectives of this chapter</i>	
IE4 Objective 2	<i>To require all developments in the County to be designed and constructed in accordance with the “Precautionary Principle” detailed in the OPW Guidelines.</i>	
IE5 Objective 5	<i>To ensure that above ground utility boxes are sensitively located and finished to reduce their visual impact, designing out anti-social behaviour and promoting soft planting around existing and new ones where feasible.</i>	Above ground utility boxes will be sensitively designed into the development.
IE7 Objective 7	<i>To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.</i>	An Operational Waste Management Plan for the proposed development has been prepared and is submitted as part of this application – please refer to same.
Policy IE8: Environmental Quality	<i>Seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation.</i>	

IE8 Objective 1	<i>To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate, consistent with RPO 10.10 of the RSES.</i>	As part of this LRD planning application, an EIAR has been prepared which included assessments of the proposed development's impacts on air quality and noise (Chapters 8 & 10 respectively) and which have considered the traffic proposals associated with the development.
IE8 Objective 5	<i>To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013, updated 2019)</i>	
IE8 Objective 6	<i>To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas having regard to the Institute of Lighting Engineers' Guidance Notes for the Reduction of Light Pollution (UK). (see section 12.11.4 (iii))</i>	A public lighting scheme has been prepared and is submitted with this LRD planning application, which has taken into account landscaping and ecological proposals for the proposed development.
IE8 Objective 7	<i>To ensure that noise sensitive development in proximity to national and other roads provides a noise impact assessment and includes appropriate mitigation measures, such as noise barriers, set back landscaping and / or buffer zones between areas of land where development is proposed and existing and proposed national and other roads.</i>	The enclosed EIAR includes an assessment of the proposed development's impacts on noise (Chapter 10), which has considered the traffic proposals associated with the development.

Table 68: Consistency with the South Dublin CDP Chapter 11.

Implementation and Monitoring

Chapter 12 of the existing CDP contains the policies/objectives for Implementation and Monitoring within the county. The following policies/objectives set out in Chapter 12 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section and / or Policy/Objective	Provision	Proposed Development Consistency
Section 12.2. / Table 12.1 & Table 12.3 – Zoning.	<i>Land-Use Zoning Objectives</i>	Under the existing CDP, the subject site is zoned “RES-N: To provide for new residential communities in accordance with approved area plans”. Table 12.3 of Chapter 12 of the CDP lists both Residential and Childcare Facilities as being “Permitted in Principle” uses under the “RES-N” land-use zoning objective. The proposed uses to be developed on the subject site include residential and childcare facility use, both of which are listed as “Permitted in Principle” uses under the “RES-N” land-use zoning objective and, therefore, the proposed development is in compliance with the land-use zoning objectives for the site.
Section 12.3.1. – Appropriate Assessment.	<p><i>Planning permission will only be granted for a development proposal that:</i></p> <ul style="list-style-type: none"> ▪ <i>either individually or in combination with existing and / or proposed plans or projects, will not have a significant effect on a European Site; or</i> ▪ <i>where such a development proposal is likely or might have such a significant effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92 / 43 / EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation.</i> 	This LRD planning application is accompanied by Appropriate Assessment (AA) which asserts that the proposed development will not have a significant effect on a European Site and may be granted permission.
Section 12.3.2. – Ecological Protection.	<i>An Ecological Impact Assessment will be required for development proposals that have the potential to impact on environmentally sensitive sites. This</i>	This LRD planning application is accompanied by an EIAR which includes an Ecological Impact Assessment i.e. Chapter 5 -

	<i>includes sites that are protected under EU and National Legislation; sites that may be in use by or contain protected species or habitats; or sites that are in proximity to significant watercourses.</i>	Biodiversity, carried out by Scott Cawley who have been surveying the subject site over the past year.
Section 12.3.2. – Ecological Protection.	<i>All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.</i>	The site layout plan seeks to preserve as many existing natural features on the site as possible, as indicated on the submitted landscaping proposals.
Section 12.3.2. – Ecological Protection.	<i>Any proposals impacting on a known site, or likely to be a breeding or resting site, for a species listed in the EU Habitats Regulations, will require a derogation license to be issued (by NPWS), so as to adhere to Article 16 of the Habitats Directive.</i>	This is noted. For clarity, relevant ecological surveys have been undertaken and there is no evidence of any breeding bird, resting or nesting activity on the site. Refer to the enclosed EIAR i.e. Chapter 5 - Biodiversity, by Scott Cawley.
Section 12.3.2. – Ecological Protection.	<i>Any development proposals which may impact on European Sites should be screened for Appropriate Assessment and accompanied by a Natura Impact Statement (see section 12.3.3 below), if required, and will be referred to the NPWS.</i>	<p>This LRD planning application is accompanied by Appropriate Assessment (AA) which asserts that the proposed development will not have a significant effect on a European Site and may be granted permission.</p> <p>This LRD planning application is accompanied by an EIAR which includes an Ecological Impact Assessment i.e. Chapter 5 - Biodiversity, carried out by Scott Cawley who have been surveying the subject site over the past year.</p>
Section 12.3.2. – Ecological Protection.	<i>In relation to development proposals on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and / or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations, 2011 (S.I. 477 / 2011).</i>	This LRD planning application is accompanied by an EIAR which includes an Ecological Impact Assessment i.e. Chapter 5 - Biodiversity, carried out by Scott Cawley who have been surveying the subject site over the past year. Previous and ongoing surveys confirm that no invasive species have been identified.

Section 12.3.3. – Environmental Impact Assessment	<i>The Planning and Development Regulations, 2001 (as amended), specify mandatory thresholds above which EIAR are required in relation to types and scale of development proposals.</i>	This LRD planning application is accompanied by an EIAR, as mandatory.
Section 12.3.4. – Archaeological Heritage	<i>All development proposals which may have implications for archaeological heritage shall be accompanied by an Archaeological Impact Assessment and a Method Statement.</i>	This LRD planning application is accompanied by an EIAR which includes Chapter 14 - Archaeology & Cultural Heritage, prepared by IAC Archaeologists who have been surveying the subject site over the past number of months – please refer to same.
Section 12.3.5. – Landscape Character Assessment.	<i>Proposals (including wastewater treatment systems and other infrastructural items associated with residential and agricultural proposals) on sites with a steep and / or varying topography should be accompanied by a comprehensive site analysis (including character appraisal and movement analysis), concept proposal and design statement as described and illustrated within the Urban Design Manual – A Best Practice Guide, DEHLG (2009). Such analysis should be accompanied by comprehensive site sections and plans detailing any proposed changes in site level and demonstrating how the proposal incorporates the natural slope and drainage features of the site. Proposals should ascend the contours of the site with unique design solutions such as lower density split level housing and sloping gardens with planted boundary treatments. Where changes in ground level between buildings are unavoidable, planted banks may be utilised.</i>	<p>Please refer to the submitted Architectural & Urban Design Statement and the Landscape Design Rationale for details on how the existing topography of the site is been handled as part of the proposed design, as well as the incorporation of SuDS features throughout the proposed development.</p> <p>Both MCORM and Davey+Smith Architects have also prepared a series of contiguous elevations for the overall development illustrating how the topography of the site has been handled.</p> <p>We note that the Urban Design Manual (2009) has been superseded by the 2024 Sustainable Residential Development and Compact Settlements Guidelines and the preceding section 5.5.18 of this Statement sets out the proposed development's compliance with Appendix D of the aforementioned 2024 Guidelines, i.e. the design checklist and its key indicators for quality urban design that have been applied to the proposed development.</p>
Section 12.4.2. – Green Infrastructure	<i>All planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the</i>	Please refer to the submitted Landscape Design Rationale for details on how the proposed development has had regard to the

and Development Management	<i>provision of green infrastructure elements as part of the application submission. All planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission.</i>	protection and enhancement of Green Infrastructure throughout the proposed development, including the incorporation of SuDS features into the proposed design.
Section 12.4.2. – Green Space Factor	<i>Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Qualifying developments are required to reach the minimum Green Space Factor (GSF) score established by their land use zoning.</i>	The proposed development achieves a Green Space Factor of 0.60 – please refer to the submitted Green Infrastructure Report for details (section 4).
Section 12.4.3. – Riparian Corridors	<p><i>Development within or affecting riparian corridors will be required to:</i></p> <ul style="list-style-type: none"> ▪ <i>Ensure that hydromorphological assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan;</i> ▪ <i>Demonstrate how the integrity of the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology;</i> ▪ <i>Promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any</i> 	Along the entirety of the eastern and western boundaries a 10m buffer will be adhered to from the top of the bank of streams and watercourses on the site. The coordinated submitted engineering and landscaping proposals illustrate same.

	<p>development site. This is a minimum and should be considered in light of the bullet points above;</p> <ul style="list-style-type: none"> Uncover existing culverts where appropriate and in accordance with relevant river catchment proposals, restore the watercourse to acceptable ecological standards for biodiversity wherever possible, improving habitat connection and strengthening the County's GI network. 	
Section 12.5.1 – Universal Design	<p>Larger scale development proposals should include an Access Statement setting out how universal design approaches will be featured within the development. All development proposals should incorporate best practice design.</p>	<p>The principles of universal design have been applied to the proposed development and a Universal Design Statement demonstrating same is submitted as part of this LRD planning application. Furthermore, a separate Site Universal Access Statement is also enclosed and we refer the reader to both documents.</p>
Section 12.5.1 – Design Considerations and Statements	<p>Applications for new development shall be accompanied by a statement from a suitably qualified person detailing how 'the plan approach' has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed. All medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq m or as otherwise required by the Planning Authority) shall be accompanied by a Design Statement. The Design Statement. All planning applications for development must demonstrate how the proposal constitutes a positive urban design response to the local context</p>	<p>Please refer to section 7.2.3 of this Statement which sets out how the proposed development complies with "the Plan Approach". The preceding section 5 of this Statement sets out how the proposed development complies with the relevant design criteria.</p> <p>Furthermore, an Architectural & Urban Design Statement, prepared by MCORM & DSA Architects is enclosed – please refer to same.</p> <p>We note that the Urban Design Manual (2009) has been superseded by the 2024 Sustainable Residential Development and Compact Settlements Guidelines and the preceding section 5.5.18 of this Statement sets out the proposed development's compliance with Appendix D of the aforementioned 2024 Guidelines, i.e. the design checklist and its key indicators for quality urban design that have been applied to the proposed development – please refer to same</p>

	<i>and how it contributes to placemaking and the identity of an area.</i>	
Section 12.5.3 - Density and Building Heights	<i>Development proposals for increased building heights and densities shall be accompanied by a contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development.</i>	Given the contextual layout of the subject site, the proposed development has maximum building heights of 5 storeys. The proposed density adheres to national guidance for a site such as this. Please refer to the preceding sections 5.2 and 5.5 of this Statement for details of how the proposed development complies with national planning policy concerning building height and density respectively.
Section 12.5.4 - Public Realm: (At the Site Level)	<p><i>Developments that include public realm proposals should provide for the following:</i></p> <ul style="list-style-type: none"> ▪ <i>Accessible public open space that retains natural or artificial landscape features such as trees, hedges, rivers / streams using minimal visual or physical clutter;</i> ▪ <i>A landscape design that creates welcoming open spaces or a parkland setting, or a landscape to enhance an urban setting complementing the character of the area;</i> ▪ <i>A layout which allows the use of sustainable forms of transport such as walking, cycling and public transport, with clearly defined footpaths and cycleways linking all buildings and public areas. Parking areas should not be a dominant feature;</i> ▪ <i>The location of public space close to public transport connections and interchanges or other major linkages;</i> ▪ <i>Promote greater connectivity and permeability throughout the development through the provision of a network of well-connected public spaces and streets, with materials, and signage that is easily interpreted by all;</i> 	<p>The submitted landscaping proposals illustrate that large useable areas of public open spaces are provided for, in addition to smaller pockets parks and communal open spaces, all of which will cater for a variety of recreational forms that will serve the future resident population of the proposed development, as well as the wider local community. The spaces are accessible, connected and usable for all users of various ages and mobility.</p> <p>All open spaces are overlooked by the public realm and dwellings, creating a safe and useable environment.</p> <p>Please refer to the submitted landscaping proposals for details of proposed play equipment and materials.</p>

	<ul style="list-style-type: none"> ▪ Crossing points and routes should be clearly identifiable, appropriately located with respect to facilities and follow pedestrian desire lines; ▪ Quality of materials, especially at significant locations is important to sustainable placemaking. 	
Section 12.5.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)	Key Principles: Identity and Sense of Place; Moving Around; Safe, Inviting and Inclusive; Gateway Features and Signage.	

Table 79: Consistency with the South Dublin CDP Chapter 12.

Section 12.6 of Chapter 12 of the existing CDP has specific regard to "Housing - Residential Development". The following policies/objectives set out in Section 12.6 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section and / or Policy/Objective	Provision	Proposed Development Consistency
Section 12.6.1 – Mix of Dwelling Types	<i>The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. SPPR 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) states that residential development 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.</i>	<p>Please refer to the submitted Planning Statement (section 7.7) which provides a breakdown of the proposed dwelling mix and typology.</p> <p>In addition, the preceding section 5 of this Statement confirms that the proposed apartment mix complies with SPPR1 of the Apartment Guidelines.</p>

Section 12.6.1 – Unit Mix	<i>Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that: à there are unique site constraints that would mitigate against such provision; or à that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or à the scheme is a social and / or affordable housing scheme.</i>	The proposed development includes 321 no. three bed units which equates to c.53% of the overall dwelling mix.
Section 12.6.1 – Unit Mix	<i>As part of the Housing Quality Assessment defined under Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments (2020), a detailed breakdown of the quantum of proposed unit types including the split between 1-bed, 2-bed, and 3-bed plus and which is in accordance with the minimum 30% 3-bed units outlined above</i>	Please refer to the submitted HQA which demonstrates the breakdown in units, in accordance with the Apartment Guidelines. Please also refer to section 7.7 of the submitted Planning Statement which provides a breakdown of the proposed dwelling mix.
Section 12.6.1 – Unit Mix	<i>A statement demonstrating how the scheme has been designed for / and could be adapted in the future for older people / persons with a disability / or lifetime homes, on a site or floor plan that:</i> <ul style="list-style-type: none"> ▪ <i>Are designed and located having regard to the needs of older people and / or persons with a disability;</i> ▪ <i>Are designed having regard to the concept of lifetime adaptable and / or multi-generational homes. In new identified residential areas, it is appropriate that schemes include a mix of house type and where a scheme is solely houses, smaller units of less than 3-bed providing for multi-generational homes, must be provided, subject to urban design and ensuring efficient use of urban land.</i> 	The principles of universal design have applied the to the proposed development, and a Universal Design Statement confirming same is submitted with this LRD application.

Section 12.6.3 – Unit Tenure	<i>The Council will support the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i>	Please refer to the submitted Planning Statement (section 7.7) which provides a breakdown of the proposed dwelling mix, which provides for a mix of 1, 2, 3, 4 & 4-5 bedroom dwellings in the form of houses, duplex units and apartments.
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Table 20: Consistency with the South Dublin CDP Chapter 12.

Section 12.6.7 of Chapter 12 of the existing CDP has specific regard to “Residential Standards”. The following policies/objectives set out in Section 12.6.7 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section and / or Policy/Objective	Proposed Development Consistency
Residential Standards	
To demonstrate compliance with the housing and apartment standards set out below, all planning applications shall be accompanied by a Schedule of Accommodation and Housing Quality Assessment document in line with Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments, (2020).	Please refer to the submitted HQA which demonstrates the breakdown in units, in accordance with the Apartment Guidelines.
Housing	
All houses must comply with or exceed the minimum floor area standards contained in the Quality Housing for Sustainable Communities Guidelines, DEHLG (2007), or as may be superseded, as shown in the table below [i.e. Table 12.20 of the CDP]. Development	Please refer to the submitted Planning Statement (section 7.7) which provides a breakdown of the proposed dwelling mix and unit typologies.

proposals for housing must be required to accord with or exceed the minimum private open space standards set out in the table below i.e. Table 12.20 of the CDP]. Generally, Private Open Space for housing should be located behind the front building line of the house and be designed to provide for adequate private amenity.

Table 12.20: Minimum Standards for Housing

Type of Unit	House Size	Private Open Space
One bedroom	50 sq m	48 sq m
Two bedrooms	80 sq m	55 sq m
Three bedrooms	92 sq m	60 sq m
Four bedroom or more	110 sq m	70 sq m

Please also refer to the submitted HQA which details the units, room storage and private open space sizes for all of the proposed dwellings.

Apartments

All apartments shall comply with the Specific Planning Policy Requirements (SPRRs), the standards set out under Appendix 1, and general contents of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2020) (Apartment Guidelines). The contents of the Guidelines have been incorporated below and the minimum floor areas set out in Table 3.21 in line with SPPR 3 of the Apartment Guidelines. The requirements of other relevant development standards including, but not limited to: minimum floor areas and width for kitchens, floor to ceiling heights, bedrooms public open space, private and communal space, play space, safety and security, acoustic and privacy standards, which must also be complied with are set out below.

Please refer to the submitted HQA which details the units, room storage and private open space sizes for all of the proposed apartments, which provides details of compliance with both the 2023 and 2025 Apartment Guidelines.

Table 12.21: Minimum Standards for Apartments

Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage
Studio	37 sq m	4 sq m	4 sq m	3 sq m
One bedroom	45 sq m	5 sq m	5 sq m	3 sq m
Two bedrooms (3 person)	63 sq m	6 sq m	6 sq m	5 sq m
Two bedrooms (4 person)	73 sq m	7 sq m	7 sq m	6 sq m
Three bedrooms (5 person)	90 sq m	9 sq m	9 sq m	9 sq m

Apartments - Safeguards

In private residential developments, 2-bedroom (3 persons) units cannot exceed 10% of all proposed apartment units. The majority of apartments in any proposed scheme of 100 units or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units, by a minimum of 10%. Any studio apartments must be included in the total but are not calculable as units that exceed the minimum by at least 10%.

The quantum of 2 bed / 3 person units does not exceed 10% of the overall apartment provision, as only 1 such unit type is proposed in the overall development and this is demonstrated in the submitted HQA.

Apartments – Private Space

- The quantum of private open space for apartments shall accord with Table 3.21.
- This space shall be provided in the form of patios / terraces, and balconies or roof gardens at upper levels and should be located to optimise solar orientation and designed to minimise overshadowing and overlooking.
- Balconies shall not overhang onto the public path in the interest of safety and must be set back.

Each apartments / duplex unit is afforded the requisite private open space provision in the form of ground floor terraces or balconies at upper levels. The areas of same are scheduled in the submitted HQA – please refer to same.

No balconies overhang public paths, and all private open spaces are clearly demarcated to ensure privacy for residents.

<ul style="list-style-type: none"> ▪ Balconies should adjoin and have a functional relationship with the main living areas of the apartment. ▪ Where amenity space is proposed at ground level, it shall incorporate boundary treatments to ensure privacy. ▪ While private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and / or a 'privacy strip' between the two. 	
Apartments – Communal / Semi-Private Space	
<p>High quality communal open space should also be provided in schemes that include apartments.</p> <ul style="list-style-type: none"> ▪ Communal open spaces should form an integral part of scheme design, be screened from full public view and public access, and should be restricted through design and / or formal barriers. ▪ Communal amenity space within apartment and / or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. ▪ The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme. ▪ Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable 	<p>A variety of communal open spaces are provided for throughout the site and details of same are set out in the submitted Planning Statement (section 7.18.2).</p>
Apartments – Internal Storage Standards	
<ul style="list-style-type: none"> ▪ Storage should be additional to kitchen presses and bedroom furniture. ▪ Hot press / boiler space will not count as general storage. ▪ In providing the storage in accordance with Table 3.21, no individual storage room should exceed 3.5 sq m and storage shall be provided within the apartment unit. 	<p>Each apartment / duplex unit is afforded the requisite storage space provision and accord with the requirements of the CDP and Apartment Guidelines. The areas of same are scheduled in the submitted HQA – please refer to same.</p>

Apartments – Floor to Ceiling Height	
In line with SPPR 5 of the Apartment Guidelines, 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.	As per the submitted architect's drawings the internal floor to ceiling heights are a minimum of 2.7m.
Apartments – Lift and Stair Cores	
In line with SPPR 6 of the Apartment Guidelines, a maximum of 12 apartments per floor per core may be provided in apartment schemes.	All the proposed apartment / duplex blocks are designed to ensure the stated units per floor per core is not exceeded. The highest number of units (8 no.) accessed from a single core is in in Blocks A, B and B1. Please refer to the submitted block plans prepared by MCORM & Davey + Smith Architects for full details.
Apartments – Separation Distances and Block Layout	
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.	The maximum height proposed is 5 storeys. Separation distances have been carefully considered and are addressed further in the enclosed Architectural Design Statement.
Apartments – Privacy and Security Considerations	
<ul style="list-style-type: none"> ▪ Apartment blocks and buildings should overlook the public realm. ▪ Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. ▪ Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas. Dwellings with direct street frontage, or ground floor apartments should generally include a privacy strip of at least 1.5 metres in depth or a front garden. ▪ This should be influenced by the design, scale and orientation of the building and by the nature of the street or public area and if 	<p>Open spaces / public realm are all overlooked by the proposed dwellings.</p> <p>The entrances to the proposed apartment/duplex blocks are easily identifiable and well lit.</p> <p>Privacy areas associated with ground floor units are clearly demarcated to ensure resident privacy.</p>

provided, should be subject to appropriate landscape design and boundary treatment.	
Apartments – Dual Aspect	
<p>In line with SPPR 4 of the Apartment Guidelines:</p> <ul style="list-style-type: none"> ▪ There shall be a minimum of 33% dual aspect units required in more 'central and accessible urban locations', where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage, ▪ 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. Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable, ▪ North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature, ▪ Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings. 	<p>The proposed development provides 57% of apartments / duplex units with dual aspect, while 38% are single aspect and 13% are triple aspect.</p> <p>The proposed development therefore complies with SPPR4 of the Apartment Guidelines.</p> <p>Refer to the submitted HQA and section 7.11 of the enclosed Planning Statement for details of aspect.</p>
Apartments – Sunlight / Daylight	
<p>Residential Developments shall be guided by the quantitative performance approaches and recommendations under the 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guideline to Good Practice (BRE 2011) and BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting' or any updated guidance.</p> <ul style="list-style-type: none"> ▪ A daylight analysis will be required for all proposed developments of 30+ units or in any other case where the layout or design could unduly impact on residential amenity. ▪ The impact of any development on existing habitable rooms should also be considered. It is for the proposer of residential 	<p>This LRD planning application is accompanied by a daylight / sunlight analysis prepared by Digital Dimensions – please refer to same for full details.</p>

applications to demonstrate that the development can satisfy the standards set out above in relation to potential impacts on the quality and usability of spaces including public open spaces and communal spaces	
Apartments – Access Cores and Communal Areas	
<p>Apartment schemes should seek to minimise the use of shared entrances, where possible, in favour of own door access at street level.</p> <ul style="list-style-type: none"> ▪ Where shared access lobbies are proposed the number of units served by one entrance should be kept to a minimum. ▪ Projecting external staircases to access upper floors should be avoided as they can dominate the streetscape. ▪ 	All ground floor units have independent own door access.
Apartments - Clothes Drying Facilities	
Adequately ventilated clothes drying facilities should be provided for apartment developments in the form of suitably sized communal facilities or individual facilities within each unit.	All of the proposed apartments are adequately sized to accommodate areas for drying clothes and will be appropriately ventilated in accordance with Buildings Regulations requirements.
Apartments – Building Lifecycle Report and Management Companies	
Planning applications for apartment developments shall include a building lifecycle report.	Please refer to the enclosed Building Lifecycle Report.
Apartments – Building Design	
<p>All new buildings during the design process shall incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations, 2006, or as may be superseded.</p> <p>All new buildings will be required to incorporate water saving measures, which may include rainwater harvesting for internal service uses.</p> <p>In particular, all new dwellings with individual surface water collection systems will be required to be provided with water butts.</p>	Please refer to the submitted Drainage and Water Infrastructure Engineering Report for details on how the proposed apartment blocks will be serviced.

The design of new buildings shall make provision for green and or brown roofs or walls to aid in both water absorption but also to contribute positively to the environment and visual amenity.

Table 21: Consistency with the South Dublin CDP Chapter 12.

The remaining policies / objectives of Section 12.6 of Chapter 12 of the existing CDP are also considered relevant and the proposed development's compliance with same is as follows:

Section and / or Policy/Objective	Proposed Development Consistency																												
Section 12.6.10. Public Open Space																													
Public open space shall be provided at the rates specified in Table 12.22 below. The occupancy rate used for the purposes of public open space calculations is 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.	Based upon the proposed 6119 no. dwellings which will produce c.1,668 persons based on the average household size of 2.73 persons as stated at Section 2.5.6 of the County Development Plan. A more site specific assessment of the population capacity of the proposed development based on actual typologies is as below.																												
<div>Table 12.22: Minimum Public Open Space Standards</div> <table><tr><th>Land Use</th><th>Public Open Space Standards (Minimum)</th></tr><tr><td>Overall Standard</td><td>2.4 Ha per 1,000 Population</td></tr><tr><td>New Residential Development on Lands Zone RES-N</td><td>Minimum 15% of site area</td></tr><tr><td>New Residential Development on Lands in Other Zones including mixed use</td><td>Minimum 10% of site area</td></tr><tr><td>Institutional Lands / ‘Windfall’ Sites</td><td>Minimum 20% of site area</td></tr></table>	Land Use	Public Open Space Standards (Minimum)	Overall Standard	2.4 Ha per 1,000 Population	New Residential Development on Lands Zone RES-N	Minimum 15% of site area	New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area	Institutional Lands / ‘Windfall’ Sites	Minimum 20% of site area	<table><tr><th>Units</th><th>Ratio as per Section 12.6.10 of the CDP</th><th>No. of Persons</th></tr><tr><td>1 bed: 55</td><td>1.5</td><td>85.5</td></tr><tr><td>2 bed: 216</td><td>1.5</td><td>300</td></tr><tr><td>3 bed: 307</td><td>3.5</td><td>1,123.5</td></tr><tr><td>4 bed: 31</td><td>3.5</td><td>115.5</td></tr><tr><td colspan="2">Total</td><td>1,624.5</td></tr></table> <p>The proposed development will provide 2.3 Ha of public open space.</p>	Units	Ratio as per Section 12.6.10 of the CDP	No. of Persons	1 bed: 55	1.5	85.5	2 bed: 216	1.5	300	3 bed: 307	3.5	1,123.5	4 bed: 31	3.5	115.5	Total		1,624.5
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4 bed: 31	3.5	115.5																											
Total		1,624.5																											

	<p>It is considered that Table 8.2 of the County Development Plan requires two minimum requirements relevant to the proposed development:</p> <ul style="list-style-type: none"> i. the overall minimum of 2.4 hectares per 1,000 population, and ii. the 15% minimum for lands zones RES-N. <p>The proposed development exceeds the minimum 15% requirement for lands zoned RES-N by providing for 19% public open space on the net developable area of the subject site. We note the discretion to impose a financial contribution in lieu of any remaining open space requirement to be held by the council for the purpose of the acquisition or upgrading of small parks, local parks and neighbourhood parks, and in exceptional circumstances to allow provision or upgrade of Regional Parks.</p> <p>The application site is subject to a number of significant constraints (all of which are outlined in the submitted Planning Statement) which demonstrates that circa 6.45 Ha of the subject site is undevelopable.</p> <p>Notwithstanding the constraints on site, as well as the planning history attached to the site to achieve an appropriate density of development, along with the topography of the site, it is considered that the provision of 19% of public open space is appropriate and complies with the County Development Plan.</p> <p>In addition to the 19% public open space provision on site, over 3Ha of the site is reserved for biodiversity / ecological protection / enhancement.</p> <p>It is considered that the County Development Plan requires either the proposed development meets the overall target for public open</p>
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	space provision, or a financial contribution in lieu. Therefore, the proposed development meets the minimum standards.
Public Open Space - Access	
<ul style="list-style-type: none"> ▪ All neighbourhood areas should have access to a range of formal and informal public open spaces for amenity, recreation, sports and play; ▪ Open spaces should be designed and located to be publicly accessible by sustainable means such as walking, cycling and public transport depending on the type of open space, and should be usable by all residents of the County; ▪ Adequate access points should be provided to open spaces to minimise distances to the areas they serve; ▪ Insofar as possible, open spaces should be linked to one another to increase their amenity value, encourage active travel between them and to facilitate the green infrastructure network; ▪ Continuous walls and other barriers between open spaces should be avoided. 	Please refer to the submitted landscaping design drawings and rationale report. The open space provision is provided for as a hierarchy spaces across the site, all of which are highly accessible and connected, which also enhance the green infrastructure network.
Public Open Space – Recreation Facilities	
Open space should be designed to offer a variety of both active and passive recreation which is accessible to all regardless of age or ability; Children's play areas should be provided as an integral part of the design of new residential and mixed-use developments and addressed as part of a landscape plan. Refer to section below on Children's Play Areas.	A variety of recreational forms, including formal and natural play, are catered for as detailed on the submitted landscaping proposals.

Public Open Space – Green Infrastructure, Biodiversity and Sustainable Water Management	
<ul style="list-style-type: none"> ▪ Parks and open spaces should be located to connect with each other so as to create green corridors and optimise their green infrastructure function; ▪ Existing trees, hedgerows and watercourses should be retained to maximise the natural setting of parks and open spaces; ▪ Planting should comprise native and pollinator-friendly species; Sustainable water management in the form of features such as integrated constructed wetlands, ponds, swales and basins should be incorporated within public open spaces and add to the amenity and biodiversity value of the spaces (appropriate to level within the open space hierarchy). 	<p>It is clear from the submitted landscaping proposals that there is considerable retention of existing trees/hedgerows across the site, which have been incorporated into the design of the scheme. This will protect and enhance the green infrastructure network.</p> <p>We also refer the reader to the enclosed arboricultural report and drawings by Arborist & Associates.</p> <p>The landscape design has been carefully integrated with the engineering surface water proposals.</p> <p>The submitted Landscape Design Rationale includes a full planting schedule – please refer to same.</p>
Public Open Space - Accessibility	
<ul style="list-style-type: none"> ▪ Age friendly and disability friendly measures should be incorporated into the overall design and layout of public open spaces, such as the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops; ▪ Facilities, equipment and information materials should be accessible for all regardless of age or ability. 	<p>Please refer to the submitted Landscape Design Rationale for details on materiality and the function of the open spaces.</p>
Public Open Space - Safety	
<ul style="list-style-type: none"> ▪ Public open space should feel safe to the user and have adequate supervision by way of passive surveillance (for example, windows overlooking the space, footpaths, cycleways and streets running through or beside the space); ▪ Smaller parks and open spaces should be visible from and accessible to the maximum number of residential units; ▪ Boundary treatment, public lighting and planting should be designed carefully to create a sense of security and to avoid opportunities for anti-social behaviour; 	<p>All areas of public open space are passively supervised / overlooked by the proposed dwellings / public realm.</p> <p>Given the size of the site, as well as the clear hierarchy and type of open spaces proposed, it is clear from the site layout plan and landscape design that all of the spaces are accessible and interconnected to ensure safe and maximum useability by all users. This is affirmed by the enclosed Site Universal Access Statement.</p>

<ul style="list-style-type: none"> ▪ Access points to parks should be maximised to increase use and thereby improve safety; ▪ Inhospitable and inaccessible open space comprising narrow tracts, backlands, incidental or 'left-over' strips of land should be designed out of all schemes; ▪ Incidental areas of open space will not be accepted as part of functional open space for the purposes of calculations 	<p>Please refer to the boundary treatment plan by Gannon & Associates is submitted as part of this LRD planning application.</p>
<p>Public Open Space – Children's Play Facilities</p>	
<ul style="list-style-type: none"> ▪ The Council will require children's play areas to be provided as an integral part of the design of new residential and mixed-use developments, to be addressed as part of a landscape plan. ▪ All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play space; ▪ Residential developments of 30 units or over shall include provision for children's play in semi-private or public open spaces, at the discretion of the Planning Authority, through provision of a Young Children's Area for Play (YCAP), or a Local Equipped Area for Play (LEAP) or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority. Where developments are predominantly 3 beds or greater, provision will be required for 10 units or over; ▪ New play spaces should generally be based on the principles of natural play; ▪ More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities; ▪ Play spaces should be carefully sited within residential and built-up areas generally so that they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residents; ▪ Play spaces should be designed to enhance the visual appearance of an area; 	<p>Please refer to the submitted landscape design rationale for details of all of the proposed play areas / facilities / types of play catered for as part of the overall landscape design.</p>

- Robust natural materials that are less susceptible to vandalism should be used wherever possible;
- Play spaces should cater for a wide range of age groups and abilities and be universally accessible;
- Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), or any superseding document.

Table 22: Consistency with the South Dublin CDP Chapter 12.

Section 12.7 of Chapter 12 of the existing CDP has specific regard to “Sustainable Movement”. The following policies/objectives set out in Section 12.7 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section and / or Policy/Objective		Proposed Development Consistency	
Bicycle Parking Standards			
Table 12.23 sets out Minimum Bicycle Parking / Storage rates for all new development in the County.		Bicycle parking for the proposed houses will be catered for within the curtilage of the individual properties.	
Table 12.23: Minimum Bicycle Parking / Storage Rates			
Category	Land-Use	Long Term	Short Stay
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
		<p>A total of 711 cycle parking spaces will be provided throughout the development, distributed between long-stay and short-stay facilities for residents, the crèche, and visitors.</p> <p>The breakdown of provision is as follows:</p> <ul style="list-style-type: none"> ▪ Residential Long-Stay: 544 spaces ▪ Residential Short-Stay: 40 spaces ▪ Crèche Long-Stay: 5 spaces ▪ Crèche Short-Stay: 15 spaces ▪ Visitor / General Short-Stay: 107 spaces <p>This provides a total of 167 short-stay and 544 long-stay spaces, giving a combined total of 711 cycle parking spaces (equivalent to approximately 1.16 spaces per residential unit).</p>	

Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-
Bicycle Design / Provision			
<ul style="list-style-type: none">▪ Location: Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road;▪ Quantity: A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement / enlargement;▪ Design: Cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Refer to the Apartment Guidelines for further details on design requirements;			
In total, 711 no. bicycle parking spaces are provided for.			

- **Management:** An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking. Refer to the Apartment Guidelines for further details on management.

Section 12.7.2 – Traffic and Transport Assessments

Traffic Impact Statements will be required for all major traffic generating development as defined by the Traffic and Transport Assessment Guidelines (2014) published by the National Roads Authority (NRA) (now Transport Infrastructure Ireland (TII)). The Planning Authority may also require such assessments where a particular development may have a significant impact on the County road network. All such statements should also be prepared in accordance with the Guidelines.

Please refer to the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers.

In addition, Chapter 14 - Material Assets: Transportation of the submitted EIAR, provides a traffic impact assessment.

Car Parking Standards

Tables 12.25 and 12.26 set out the Maximum Parking rates for non-residential and residential development.

Table 12.26: Maximum Parking Rates (Residential Development)

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

A car parking ratio of c. 1.4 is achieved for the scheme overall, with a total of 861 car parking spaces will be provided, comprising 854 no. residential spaces and 7 no. spaces for the crèche to serve the proposed development. Justification for the proposed parking standard is outlined in the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers – refer to same.

Regard has also been had to Sustainable Residential Development & Compact Settlement Guidelines which require that 1.5 no. spaces per dwelling be provided in accessible locations.

The justification for a reduced car parking rate for the proposed development is based on the proximity of the proposed development to existing public transport services – bus & Luas.

Education	College of Higher Education	1 per staff plus 1 per 15 students	1 per 2 staff plus 1 per 30 students	
	Crèche School ⁹	1 per classroom	0.5 per classroom	
Section 12.7.5 Car Parking / Charging for Electric Vehicles (EVs)				
<ul style="list-style-type: none">▪ EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas.▪ The remainder of the parking spaces should be constructed to be capable of accommodating future charging points.▪ In residential and mixed-use schemes EV charging should be provided in blocks or pods unless it can be satisfactorily demonstrated that it can be provided in a more satisfactory and efficient manner.▪ It should be designed and located in such a way as to ensure passive surveillance and avoid anti-social behaviour.▪ The applicant should indicate the mechanism for EV charging and payment (for example, fob / credit card or other means) and should ensure that it is available to residents and visitors.▪ EV charging facilities should not impinge on shared parking allocation.▪ EV charging facilities should not obstruct or impinge on walking or cycling paths.▪ Charge points should avoid areas which are already restricted by existing street furniture for example, bollards, road signs, benches, bike racks.▪ Charge points should not impede lower carbon forms of passenger transport.				The proposed development provides for EV parking, either by way of ducting to serve the individual properties or by designated spaces at surface level.

<ul style="list-style-type: none"> ▪ Charge points should not be located at the back of the footpath (that is, the side furthest from the road) to avoid cables becoming a trip hazard. ▪ For residential multi-unit buildings, the necessary ducting for all car parking spaces should be installed, allowing provision for additional electrical infrastructure. ▪ For new dwellings with in-curtilage parking, appropriate infrastructure should be provided to allow for installation of a charging point at a later date. 	
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Table 23: Consistency with the South Dublin CDP Section 12.7.

Section 12.8 of Chapter 12 of the existing CDP has specific regard to "Community Infrastructure and Open Space". The following policies/objectives set out in Section 12.8 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section 12.8.1 Community Centres	
<p>In residential or mixed-use new development areas, the Council will apply a standard of 1 large district level, multi-functional community centre per 8,000 population or equivalent smaller centres at a more local level to address specific needs (or as may be updated by any future community centre strategy carried out by the Council).</p> <ul style="list-style-type: none"> ▪ A district level community centre should be approximately 1,200-1,800sq.m in size. ▪ Smaller centres at a more local level should generally be between 350-650sq m in size. ▪ In some circumstances, the Council may require residential or mixed used developments in new development areas to provide 	<p>As agreed with South Dublin County Council, the Applicants will pay a development / financial contribution in lieu, which is intended to be used towards the provision of a new community facility for the Citywest area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.15 of the submitted Planning Statement for details.</p>

a pro rata contribution towards the provision of a community centre, and in line with the Development Contribution Scheme (see Chapter 8, Policy COS3 Objective 3).	
Section 12.8.4 Early Childhood Care and Education Facilities	
<p>Applications for childcare facilities should be assessed with regard to the requirements of the 'Childcare Facilities: Guidelines for Planning Authorities', DEHLG (2001) and Circular Letter PL 3 / 2016 (DECLG)) and any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as:</p> <ul style="list-style-type: none"> ▪ Type of residential units (if mainly one-bedroom units, childcare need may be reduced); ▪ Emerging demographic profile; ▪ Availability of existing childcare services in the vicinity. In new developments, childcare facilities should be purpose built, at ground floor level or in a stand-alone building. 	The proposed development provides for a standalone childcare facility, occupying a floor area of c. 630sq.m and catering for c. 148 no. childcare places.

Table 24: Consistency with the South Dublin CDP Section 12.8.

Section 12.11 of Chapter 12 of the existing CDP has specific regard to "Infrastructure and Environmental Services". The following policies/objectives set out in Section 12.11 of the existing CDP are considered relevant and the proposed development's compliance with same is as follows:

Section 12.11.1 Water Management	
Development proposals on lands that may be at risk of flooding should be subject to a flood risk assessment, prepared by an appropriately qualified Chartered Engineer, in accordance with the Flood Risk Management Guidelines.	The proposed development provides for Sustainable Urban Drainage Systems (SuDS) measures, as detailed in the submitted Drainage & Water Infrastructure Engineering Report (sections 5-7).

Development proposals should provide suitable drainage measures in compliance with the South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide, 2022.

In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SuDS).

A site specific flood risk assessment (hereafter SSFRA) has been undertaken by Kilgallen & Partners, as referred to above, and is enclosed – please refer to the SSFRA for specific details of the flood risk assessment undertaken. The following is a synopsis of same only – for full details please refer to the submitted SSFRA.

In accordance with the Flood Risk Management Guidelines, the submitted SSFRA has carried out a Development Management Justification Test in respect of the proposed development, the details of which are set out in section 11 of the SSFRA, and Table 11.1 of same, presents the results of this test which conclude that the proposed development satisfies the criteria of the Justification test – please refer to same for further details.

The submitted SSFRA concludes that the SSFRA was carried out in accordance with the document 'Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)'. It also confirms that *“for an inland Site of this nature and for which there are no existing flood defence mechanisms that could affect flood risk at the Site, the potential flood risk mechanisms are Fluvial, Pluvial and Groundwater.*

Initial assessment of existing flood risk indicators indicate the Site is not at risk from either Pluvial or Groundwater flooding.

Initial assessment of flood risk indicators suggest the Site could be at risk from Fluvial Flooding. Accordingly, a detailed assessment of fluvial flood risk was carried out. This detailed assessment confirmed that the Site is affected by flood risk zones A & B at its northern boundary.

The proposed development includes a basin at the northwest corner of the Site which is designed to provide direct compensatory

storage. The inclusion of this basin means that while the proposed development will impact on existing flood risk zones at some locations (Section 5.1) and thus displace floodplain storage, it reduces the ground level at other locations, thereby providing compensatory storage. Cumulatively, more floodplain storage will be available upon completion of the proposed development than is currently available, leading to a slight reduction on flood risk elsewhere, in the areas immediately surrounding the Site.

The proposed development includes stream crossings at the locations shown on Figure 5.7. A preliminary design for each structure has been carried out in accordance with OPW requirements. Soffit levels are at least 500mm above the 1% AEP level at all crossings and so comfortably exceed OPW requirements. Two of the crossings are vehicular and crossing levels are constrained by the requirement to tie-in to existing road levels. OPW Section 50 consent have been obtained for these crossings; a copy of the consents is included in Appendix E.

The Flood Risk Management Guidelines recommend that floor levels be kept above the 1.0% AEP flood level with an appropriate allowance for freeboard, typically 0.5m. The maximum post-development 1% AEP water level in the basin at the north boundary is 118.10m. The minimum proposed floor level is 120.50m, 2.40m above the 1% AEP level and 1.90m above the recommended minimum. This SSFRA also recommends that road levels should be kept a minimum 250mm above the 100year flood level. The minimum proposed road level is 120.00m, 1.90m above the 1% AEP level and 1.65m above the recommended minimum.

As described in Section 5.4, the finished level of the open space adjacent to the Corbally stream has been raised where required to

	<p><i>provide a minimum 750mm freeboard above the 1% AEP water level in the stream.</i></p> <p><i>The proposed development was subject to and passed the Development Management Justification Test.</i></p> <p><i>The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective".</i></p> <p>The SSFRA included appropriate factors to allow for the potential impact of climate change.</p>
Section 12.11.3 Waste Management	
Construction and Demolition Waste Management Plans should be submitted as part of development proposals for projects in excess of any of the following thresholds: à New residential development of 10 units or more.	Please refer to the enclosed Resource and Waste Management Plan.
Section 12.11.4 Environmental Hazard Management	
<p>In considering development proposals for planning permission, the Planning Authority will have regard to the Air Quality Management Plan for the Dublin Region. Air quality standards are set by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011) which transposes the Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008 / 50 / EC) into Irish legislation.</p> <p>The Planning Authority will have regard to the Dublin Agglomeration Environmental Noise Action Plan (2018-2023), or superseding plan, when assessing development proposals along major road and rail transport corridors, with a view to reducing noise from new sources and to identify and protect areas of low sound levels.</p>	<p>This LRD planning application is accompanied by an EIAR.</p> <p>A public lighting layout plan is submitted as part of this LRD application which has had regard to the landscaping proposals, and the findings of the Ecological Impact Assessment (EclA) which is set out in Chapter 5 – Biodiversity of the submitted EIAR.</p>

<p>The co-ordination of proposed Landscape Plans and Public Lighting Plans (and other utilities) to include Environmental Zones, where applicable, will be required from the pre-planning stage all the way through the planning application process to compliance.</p> <p>All residential developments above 5 residential units and all other proposed developments shall submit a full lighting plan. This shall be a co-ordinated plan showing the proposed landscape plan, public lighting and other services and any environmental/ecological related requirements and that these are prepared in accordance with industry best practice and in compliance with: à The most up to date edition of EN13201 à Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020 à Relevant documents of the Society of Light and Lighting à South Dublin County Council's Public Lighting Specification, 2016, (as updated).</p>	
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Table 25: Consistency with the South Dublin CDP Section 12.11.

Appendix 4 of the South Dublin County Development Plan, 2022-2028 - "Green Infrastructure: Local Objectives and Case Studies"

This document refers to South Dublin's Green Infrastructure (GI) Strategy which provides an overarching vision and spatial framework for GI in the County which aims to protect, promote and enhance its GI assets. We note that this Appendix document builds on and further elaborates the Strategy presented in Chapter 4 of the Development Plan. Specifically, this Strategy seeks to support a network of Strategic County GI Corridors (described in Chapter 4) which are further supported by a number of Local GI Corridors.

Local GI Corridors provide additional interconnectivity for the county-wide GI network and contribute ecosystem services at the local scale. By linking communities, local parks and public and private open spaces into the wider GI network these corridors will enhance biodiversity, improve access and contribute to local benefits around placemaking, environmental quality, water management and climate change mitigation.

One such Local Corridor is "L7 – Citywest-Saggart Link -Rathcoole Park – Citywest Golf Club – Green space at Cooldown Commons – Coldwater Commons – Green space for development adjacent to Fortunestown Luas Stop – Citywest Village Green – Citywest Ave green space – Roadstone Quarry".

Corridor L7 draws a connection between green spaces at the edge of Citywest to South Dublin's urban-rural fringe at Saggart and Rathcoole. This area presents a difficult spatial situation as several green spaces (stepping stones) have been separated from each other by residential and industrial development.

These spaces include Fortunestown LAP which is noted to be currently under development providing for the retention of wetlands and hedgerows. One of the objectives relevant to the subject site at Boherboy is to *“engage with stakeholders in order to support the implementation of GI features within the Fortunestown LAP”*, and to *“undertake a study / planning for the development of a planting strategy to create a link between the Fortunestown Local Area Plan lands and the L7 Corridor”*.

In developing the Green Infrastructure Strategy for South Dublin, a Case Study Framework was developed which includes “Case Study 3: Citywest”, which is described as a “new urban” typology. Specific areas for policy focus include:

- GNU-1: To seek the creation of new wetlands and / or enhancement of existing wetlands through provision for Sustainable Drainage Systems (SuDS).
- GNU-2: To retain and, if relevant, restore connectivity between watercourses by opening up culverts, where possible
- GNU-3: To incorporate some GS (tall uncut) grassland and appropriate biodiverse planting in local parks north and southeast of Citywest Shopping Centre
- GNU-4: To ensure that all landscaping in publicly owned land is biodiversity friendly given Citywest's location in the foothills/rural Dublin
- GNU-5: To ensure that the natural and riparian features within the LAP lands are protected and used to enhance amenity and water quality and provide for connections to the open spaces within the Fortunestown lands
- GNU-6: To link new development areas to existing parklands and amenities, providing for active and passive recreation for growing communities
- GNU-7: To ensure that new development results in no net loss of existing trees and hedgerows
- GNU-8: To incorporate new pocket parks and green spaces to provide active and passive recreational amenities for new and growing communities
- GNU-9: To provide suitable new planting and landscape measures as part of all new developments
- GNU-10: To incorporate new multifunctional green play areas for new and existing schools
- GNU-10: To use existing natural landscape features such as ditches and hedgerow systems to guide the development and implementation of new nature-based SuDS systems in new developments.

Statement of Consistency:

The proposed development includes over 3Ha of land within the site that is to be kept free from development such that the necessary biodiversity / ecological buffers / corridors are created and maintained.

The proposed development includes various open spaces throughout, over 2.3Ha of land provided as meaningful and useable open spaces.

New pedestrian and cyclist connections are provided into the adjoining Carrigmore Park to the north-east.

Significant SuDS proposals are incorporated into the scheme, married with landscaping proposals and adhering to the requirements of both the ecological and flood risk assessments of the proposed development.

The majority of existing tree and hedgerows are being maintained with considerable planting proposed such that there is no net loss across the site.



Subject site at Boherboy is the only remaining undeveloped land in the previous LAP with all other lands committed in terms of planning, either built out or under construction.

**Fig. 21 – Extract of Case Study 3 Citywest with previous Fortunestown LAP lands outlined in orange.
Evaluation of Consistency with the South Dublin CDP**

- 7.2.2** Given all the foregoing as set out in Section 7.2 of this Statement, it is respectfully submitted the proposed development is fully compliant with the applicable policies and objectives the existing South Dublin CDP, and as such, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended local policy/guidance.

8.0 Conclusions of Statement of Consistency

8.1 This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning Consultants, on behalf of Kelland Homes Ltd and Evara Developments Ltd., (the Applicants), to accompany this planning application in respect of a proposed Large-Scale Residential Development (LRD) in respect of lands located in the townland of Boherboy, Saggart, Co. Dublin

8.2 This Statement of Consistency has detailed how the proposed development is consistent with the objectives of the relevant planning policies pertaining to the development site at local, regional, and national level. It is considered that the proposed development is consistent with national policy and with the policies and objectives of the current South Dublin County Development Plan, 2022-2028. The proposed development will result in a very attractive place to live on zoned serviced lands in close proximity to public transport and local services.

8.3 At a national and regional level, this statement has demonstrated the compliance of the development with the following:

- Project Ireland 2040 - National Planning Framework, First Revision (2025),
- Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness (2025),
- Sustainable and Compact Settlements Guidelines for Planning Authorities, (2024),
- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018),
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009),
- Climate Action Plan (2019),
- Smarter Travel – A New Transport Policy for Ireland 2009-2020,
- National Sustainable Mobility Policy, (2022),
- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031,
- The Transport Strategy for the Greater Dublin Area, 2016-2035.

8.4 At local level, this Statement has demonstrated the compliance of the proposed development with the following, statutorily adopted Plans for the administrative area within which the subject site is located:

- South Dublin County Development Plan, 2022-2028.

8.5 Having regard to all the foregoing contained in this Statement of Consistency, it is considered that the proposed development is appropriate for the subject site. The proposed development of the subject site at Boherboy represents an opportunity to deliver a residential development offering a quality living environment, respectful of its context, site topography and site character, while making efficient use of land which is in close proximity to / adjacent to existing high frequency public transport. It is considered that the proposed development is fully in accordance with Government guidance in relation to the delivery of new residential development, supports the objectives of the CDP, national and regional policy, and represents the proper planning and sustainable development of the area.

