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ASSOCIATES

PROJECT:

Proposed Large-scale Residential Development (LRD) in the townlands of Bohernabreena, Oldcourt & Killinenny, Dublin 24.

APPLICANT:

Capami Ltd.

REPORT:

LRD Statement of Consistency

DATE:

September 2024.

**Planning &
Development
Consultants**



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1.0. Introduction

1.1 Purpose of Report

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 Capami Ltd. (the applicant) to accompany a planning application for a Large-scale Residential Development (hereafter “LRD”) in respect of a site measuring c.20.4 hectares located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014 (as extended).

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.*

Under Section 32B of the Act of 2021, our client, the applicant, Capami Ltd. wishes to apply for permission for a LRD on the subject site. Section 32B(1)(ga) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 states that in requesting a LRD meeting, a prospective LRD applicant should include “*a statement setting 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*”. Furthermore, the Planning and Development (Large-scale Residential Development) Regulations 2021 require a LRD application to be accompanied by a statement of consistency with the Development Plan. In accordance with same, this Statement of Consistency (hereafter ‘statement’) is put forward to demonstrate that the proposed development is consistent with the relevant national, regional, and local planning policy.

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.

1.2 Structure of Report

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

2.1 Site Context

The subject site is situated in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014 (as extended).

More specifically, the subject site is located to the east of Bohernabreena Road (L7114) and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (the R113).

The aforementioned Dodderbrook and Ballycullen Gate developments have been / are being successfully delivered respectively by the applicant. In addition, the applicant has permission for the development of 21 no. residential units located to the west of Dodderbrook (granted permission under South Dublin County Council Ref. SD19A/0104 / An Bord Pleanála Ref. ABP-305800-19) which has recently commenced construction. Permission has also been granted for the development of 71 no. units to the immediate west of the subject site under Ref. SD23A/0083. Further east of the subject site is the Ballycullen Green residential estate and the Gunny Hill playing pitches, which have also been delivered by the applicant in recent years.

Figure 1 on the page over provides for an illustrative map of the subject site and the surrounding developments/permissions in the vicinity.

2.2 Site Description

The site is at the southern urban edge of the county, with residential development to the north and open field agricultural lands to the south. The site is irregular and elongated in shape, stretching east to west, in the townlands of Bohernabreena, Oldcourt and Killininny. The site is currently, predominantly greenfield agricultural lands, dissected with mature hedgerow boundaries. In the south-western part of the site, there are a number of buildings / sheds and two no. habitable dwellings, located to the north of the Bohernabreena Cemetery, all accessed directly from the Bohernabreena Road, all of which are proposed to be demolished as part of this proposed LRD.

The subject site is characterised by a sloped terrain, rising to the south, existing native hedgerows, and existing services infrastructure. There is an existing ESB pylon corridor with a wayleave running across the site, from west to east, and an existing Irish Water main with a wayleave also running across the site, from west to east, as coloured in yellow on the submitted site location map and site layout plans. The proposed site layout plan allows for the accommodation of these wayleaves on the site. The subject site generally falls from south to north, with a high point of the southern boundary of Approximately 119.78m OD Malin. The lowest point along the northern boundary is approximately 98.12m OD Malin where the site connects into an existing ditch. The ground level rises steeply from north to south - there is a difference of approximately 21.0m in elevation between the north and south. The ground level continues this steep gradient south of the Site. The ground level falls away north of the Site but at a shallower gradient.

The subject site has the presence of dense, well-established hedgerows, characterized by a thick growth of shrubs, bushes, and trees, which create natural boundaries. In addition, the site has the presence of small streams crossing through the dense hedgerows.

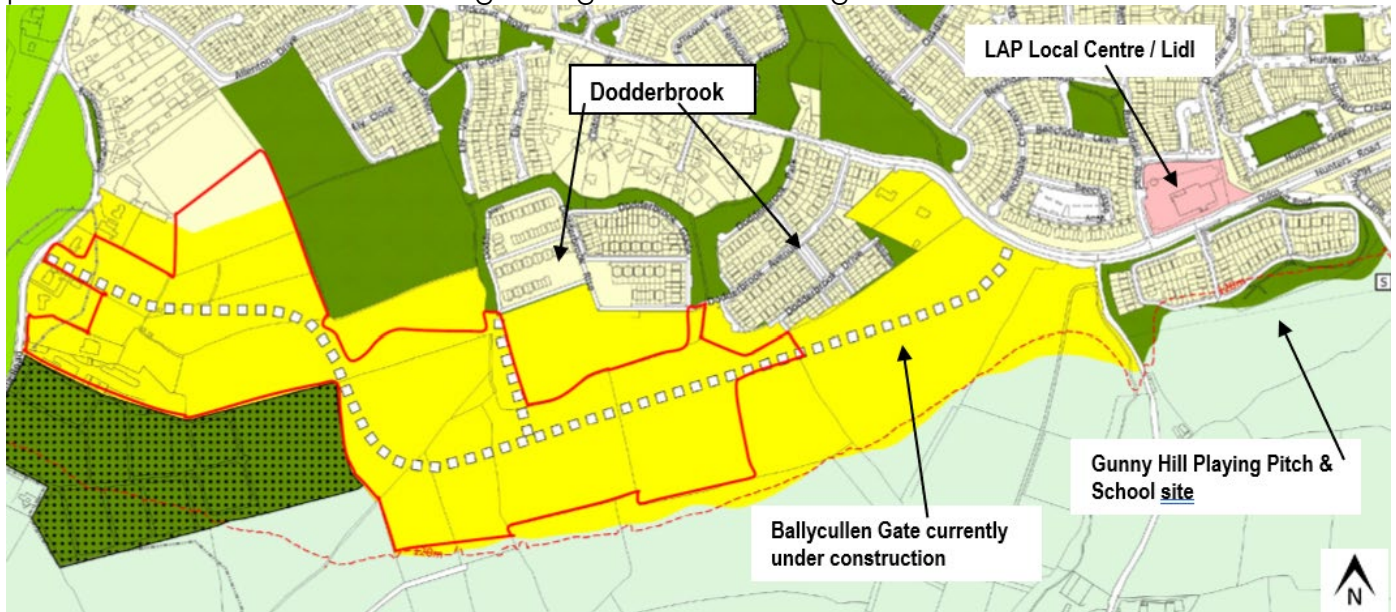


Figure 1: Extract from South Dublin County Development Plan, 2022-2028 (Map No. 9), with subject site indicatively outlined in red.

2.3 Planning Context

The majority 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 523 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.

A triangular portion of the site at the northwest (adjacent to St. Anne’s GAA club) is zoned objective “RES”: “*To protect and / or improve residential amenity*”. Under this land use zoning objective, residential development is permitted in principle, with childcare facility being a use that is open for consideration.

At the north of the site, a strip of land, currently zoned objective “OS”: “*To preserve and provide for open space and recreational amenities*” is included for infrastructural purposes i.e. to accommodate a proposed 225mm Ø Foul Sewer pipe. It is put forward that given the proposed sewer pipe will be located underground, the provision of a use compatible with the open space zoning above same will be possible and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including “*all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers...*” are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on “OS” land will not affect the future utility of the “OS” lands and no, permanent, above ground impacts will occur directly as a result of this development.

Letters of consent from South Dublin County Council and Dublin City Council to the inclusion of the land required to accommodate the proposed sewer are enclosed with this LRD application.

To the south, a small portion of land (within Neighbourhood Zone 1 & immediately south of proposed house no.s 154 - 156) is zoned "RU": "To protect and improve rural amenity and to provide for the development of agriculture". This parcel of land is proposed as open space, with no other development proposed on same. Under the "RU" land use zoning objective, open space is a use that is permitted in principle under this zoning objective.

Please refer to the submitted Davey+Smith drawing no. MP13 "Overall Lands – Land Use Zoning Map" which overlays the proposed development and red line of application over the CDP Zoning Map no. 9.

In accordance with the current "RES-N" land-use zoning objective, the subject site is also the subject of a Local Area Plan for the entire Ballycullen-Oldcourt area. The Ballycullen-Oldcourt Local Area Plan (as extended) (hereafter "LAP") was adopted in 2014 and was due to expire in 2020; however, South Dublin County Council extended the life of the Ballycullen-Oldcourt LAP, which we understand will expire in September 2024. While the LAP may have expired by the time a decision is being made on this proposed LRD, regard has been had to same in the preparation of this LRD planning application.

The Ballycullen-Oldcourt LAP forms the basis for the development of approximately 90 hectares (222 acres) along the Ballycullen-Oldcourt fringe, which are in the majority zoned objective "Res-N" for new residential development within the existing CDP. The overall objective of the Ballycullen-Oldcourt LAP is to provide a development framework with residential densities appropriate to the unique location of the lands on the suburban edge of Dublin and at the foothills of the Dublin Mountains. The Ballycullen-Oldcourt LAP provides for the construction of approximately 1,600 additional dwellings (catering for about 4,600 persons).

For the purposes of the Ballycullen-Oldcourt LAP's phasing strategy, the Plan lands are divided into "eastern" and "western" sides with Ballycullen Road being the point of division. The subject site is located on the western side of the Plan lands.

Figure 2 below illustrates the subject site in the context of the western side of the Ballycullen-Oldcourt LAP lands.

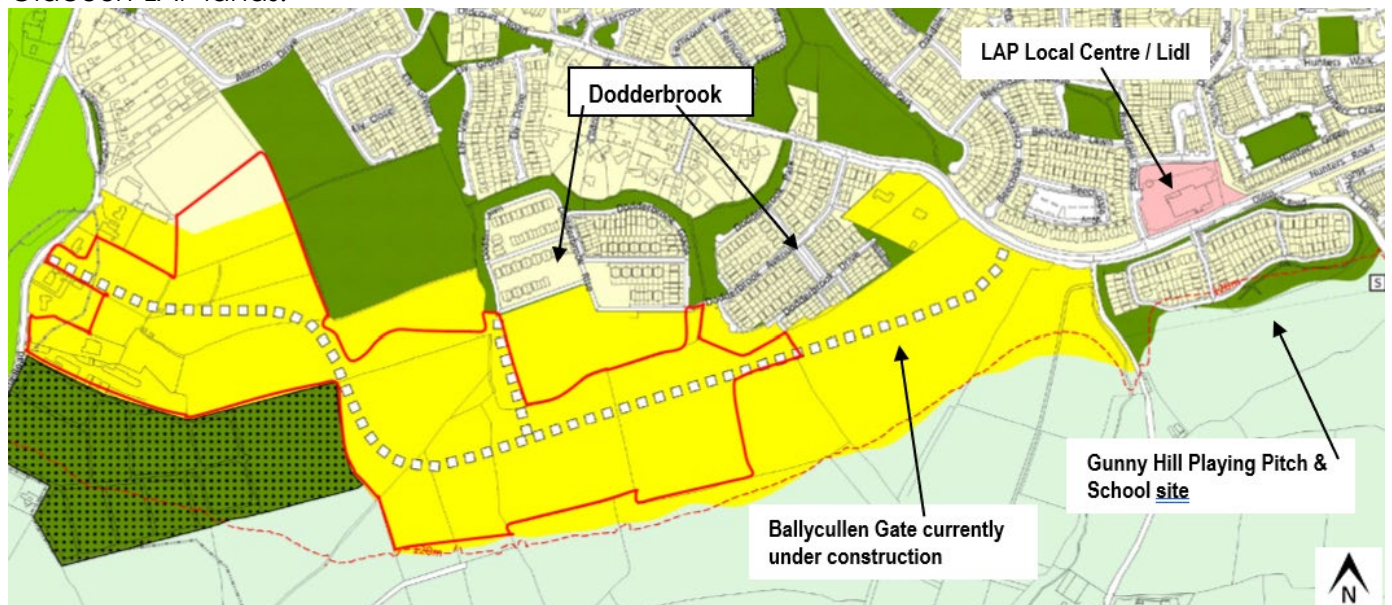


Figure 2: Extract from South Dublin County Development Plan, 2022-2028 (Map No. 9), with subject site indicatively outlined in red.



2.4 Development Proposal

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 and Social Infrastructure Assessment, both prepared by Armstrong Fenton Associates
- Architectural Design Statement prepared by Davey + Smith Architects
- Landscape Design Report prepared by Gannon + Associates

The development being put forward for consideration can be described as follows:

Capami Ltd. wishes to apply for a seven year planning permission for a Large-Scale Residential Development (LRD) on a site measuring c.20.4Ha, located in the townlands of Bohernabreena, Oldcourt, and Killininy, Dublin 24. The development site is located to the east of Bohernabreena Road, north and east of Bohernabreena cemetery, south and south-east of St. Anne's GAA club, south and south-west of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction) and west of Oldcourt Road (R113).

The proposed development consists of 523 no. residential units comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in PV & 3-4 storey blocks (i.e. Blocks A, B2 & D, and 2 no. Blocks B1 & 2 no. Blocks C), along with a 2 storey childcare facility of c. 457sq.m.

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. 7.3Ha of public open space, and c. 5,505sq.m of communal open space associated with proposed residential units.

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site, via 2 no. accesses, located off Bohernabreena Road, (ii) from the north of the site, via 1 no. access at Dodderbrook Place, and (iii) from the east of the site, via Oldcourt Road (R113) and via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06sq.m).

The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.3Ha), (iii) communal open spaces (c. 5,505sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (746 no. car parking spaces, including EV parking), (vi) bicycle parking (1,268 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.



3.0. Policy Documents Considered

The following policy documents have informed this Statement:

National Planning Context / Strategic Policy Documents

- Project Ireland 2040 - National Planning Framework (2018),
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016),
- Housing for All – a New Housing Plan for Ireland (2021).

Section 28 Ministerial Guidelines

- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- 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),

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,
- Ballycullen-Oldcourt Local Area Plan 2014.

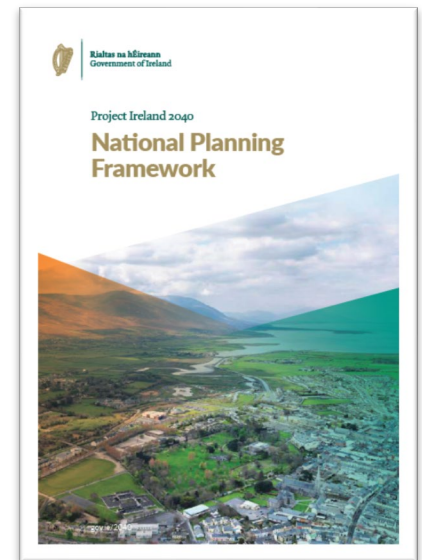
4.0. Statement of Consistency with National Planning Policy

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 (2018),
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016),
- Housing for All – a New Housing Plan for Ireland (2021).

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

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.



A core element of the NPF's strategy is to deliver compact growth in existing urban areas, with the key features being:

- *Targeting a greater proportion (40%) of future housing development to be within and close to the existing footprint of built-up areas.*
- *Making better use of under-utilised land and buildings, including "infill", "brownfield" and publicly owned sites, and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.*
- *Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management against overspill into surrounding counties.*
- *Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.*

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 11 no. chapters contain National Policy Objectives (75 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.

The NPF projects an additional 550,000 homes will be required to meet future demands by 2040, with the Eastern and Midland Region (including South Dublin County) projected to increase in population by at least half a million people by that time, to a population of approximately 2.85 million people (National Policy Objective 1b). 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.

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”.

Based on all the foregoing, it is put forward the current proposal for the development of 523 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.



Figure 3: National Strategic Outcomes of the NPF.

The 2016 Census states the population of South Dublin County as being c. 278,767 persons. The average household occupancy rate in South Dublin County was 2.99 persons per dwelling in 2016 which compares to a State average of 2.75 persons per dwelling. The NPF notes that the average household occupancy rate in the State is expected to decline to around 2.5 persons by 2040, which will have impacts on the types of housing required to meet demand.

NOTE: We note that since the publication of the NPF that Census 2022 was undertaken, which marked the first time in 171 years that the population of Ireland surpassed 5 million people. Census 2022 also showed that the population of South Dublin County was 299,793 which is an increase of c7.5% (21,026 persons) between April 2016 and April 2022. We also note that the average household size in South Dublin County is at 2.97 people in 2022. (Source: www.cso.ie).



National Policy Objectives of the NPF considered most relevant to the proposed development at Bohernabreena / Oldcourt are set out Table 1 below together with a statement of the proposed development's consistency with same.

National Policy Objective 1b (partial): *Eastern and Midland Region: 490,000 - 540,000 additional people i.e., a population of around 2.85 million.*

National Policy Objective 1c (partial): *Eastern and Midland Region: around 320,000 additional people in employment i.e., 1.34 million in total.*

National Policy Objective 2a: *A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.*

Statement of Consistency

In accordance with the above National Policy Objectives and having regard to the locational context of the subject site and its receiving environs, the proposed development will deliver a medium density development of modern and adaptable new homes, within an existing urban area in one of the five cities identified by the NPF (Dublin) 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 use (childcare) capable of providing new employment opportunities. In addition, the subject site is located proximate to existing public transport (bus services), which will allow for ease of movement from the development to existing employment centres in the vicinity e.g. Tallaght.

National Policy Objective 3a: *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

National Policy Objective 3b: *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*

National Policy Objective 4: *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.*

National Policy Objective 5: *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

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

Statement of Consistency

In accordance with the above National Policy Objectives, the proposed development will deliver a medium density development of modern new homes, proximate to existing built-up residential areas and existing public transport and local service provision in one of the five cities identified by the NPF (Dublin).



The proposed development caters for a contemporary residential 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, with the proposed layout designed to integrate with the surrounding environs and support / rejuvenate the wider community.

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 523 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.

National Policy Objective 8: *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.*

Statement of Consistency

Table 4.1. of the NPF details the 2016 population of "Dublin City and Suburbs" as being 1,173,179 persons, with a targeted population growth between 235,000-293,000 persons to the year 2040, giving a minimum population target of 1,408,000 within the life of the NPF. Therefore, in accordance with National Policy Objective 8, 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 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

Statement of Consistency

In accordance with the above National Policy Objective, the proposed development provides for a medium-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 (bus services), which will allow for ease of movement from the development to existing employment centres in the vicinity e.g. Tallaght. All the proposed dwellings are compliant with the most up-to-date Building Regulations, design, and planning standards. The proposed development of 523 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 11 of the NPF.

National Policy Objective 13: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

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

The proposed development caters for two and three storey buildings, 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 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.

National Policy Objective 27: *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. The proposed development includes for the provision of 2 no. bus stops along the proposed east-west road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes.

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, east and west, and includes for cycling and pedestrian routes throughout the development.

The proposed development also provides an ample provision of public and community open space, including for the delivery of "Oldcourt Park" as defined by the Ballycullen-Oldcourt LAP, which will allow for a range of physical activities to take place within the development.

National Policy Objective 28: *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-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 the Sustainable Urban Housing: Design Standards for New Apartments (2023), 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, east and west, 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 10-20% 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 31 (partial): *Prioritise the alignment of targeted and planned population and employment growth with investment in:*

.....

- *The provision of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations;*

.....

Statement of Consistency

The proposed development includes for a childcare facility capable of supporting the expected demand generated by the development of 523 no. new dwellings.

National Policy Objective 32: *To target the delivery of 550,000 additional households to 2040.*

National Policy Objective 33: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

National Policy Objective 34: *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*

National Policy Objective 35: *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

Statement of Consistency

The proposed development will deliver 523 no. new dwellings on lands zoned for residential land use and will therefore greatly contribute to the delivery of 550,000 additional households to 2040.

The subject site is located on lands zoned for residential land use situated within the metropolitan area of Dublin, which is identified for significant residential growth over the next two decades. It is considered the land-use zoning objectives attached to the subject site, in tandem with the site's location and existing public transport infrastructure in the area, will ensure the proposed development is sustainable.

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 the Sustainable Urban Housing: Design Standards for New Apartments (2023), 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 will provide a medium-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.

National Policy Objective 52: *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 53: *Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.*

National Policy Objective 56: *Sustainably manage waste generation, 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 57: *Enhance water quality and resource management by:*

- *Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;*
- *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), nonporous surfacing and green roofs, to create safe places."*

National Policy Objective 60: *Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.*

National Policy Objective 62: *Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.*

National Policy Objective 63: *Ensure 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 64: *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 65: *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.*

National Policy Objective 75: *Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.*

Statement of Consistency

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).

Table 1: Consistency with NPF objectives.

Evaluation of Consistency with the NPF

In accordance with the National Policy Objectives of the NPF, the proposed development will deliver a medium density development of modern and adaptable new homes adjacent to existing built-up residential areas and in close proximity to existing public transport (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', which seeks to make better use of: *"under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport."*

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. Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland was launched in 2016 and is the Government's Action Plan for Housing and Homelessness. The overarching aim of the Action Plan is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that:

"locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision."



The Action Plan is structured on five key pillars, with Pillars 2 and 3 considered most relevant:

- Pillar 2 – Accelerate Social Housing
- Pillar 3 – Build More Homes

Evaluation of Consistency with Rebuilding Ireland

The proposed development caters for 523 no. dwellings comprised of 1, 2, 3 & 4 bed houses, apartments and duplex units, with 95 no. of the total of dwellings proposed to be delivered to as Social & Affordable Housing, representing 10-20% 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 “Accelerate Social Housing” of the Rebuilding Ireland Action Plan.

The proposed development caters for 523 no. dwellings on a greenfield site, zoned for 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 County 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 Pillar 3 “Build More Homes” of the Rebuilding Ireland Action Plan.

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 the Sustainable Urban Housing: Design Standards for New Apartments (2023), 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 for All – A New Housing Plan for Ireland (2021)

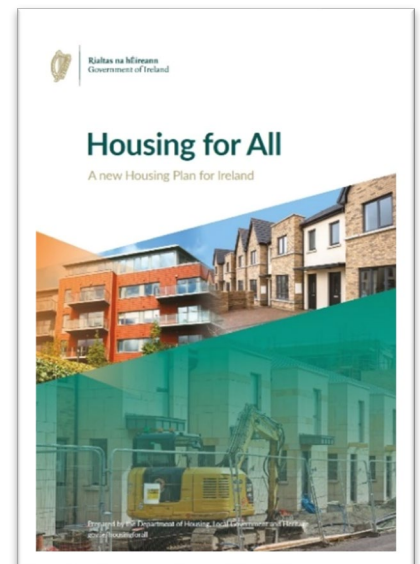
Housing for All - a New Housing Plan for Ireland was launched in 2021 and is the Government's housing plan to the year 2030. The Plan sets out how short, medium, and long-term challenges of housing system will be addressed.

The overall aim of the Plan is that everyone in the State has access to a home to purchase or rent at an affordable price, which is built to a high standard in the right place in support of climate action, offering a high quality of life.

The Plan is supported by additional funding and aims to work with all stakeholders, with a central element Plan being working with and enabling the private sector to deliver on housing.

The Plan estimates that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF. To achieve these targets the Plan is based upon four pathways as follows:

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





Evaluation of Consistency with Housing for All

The proposed development is considered to be consistent with objectives of Housing for All - a New Housing Plan for Ireland. The development provides for 523 no. new residential dwellings on a greenfield site zoned for residential development and is located within the existing urban footprint of Dublin.

The provision of 523 no. dwellings on the subject site will substantially add to the residential accommodation available in South Dublin thus increasing new housing supply, which will ultimately aid the objective to increase housing affordability. The proposed dwellings will be available to individual purchasers thus supporting homeownership.

The proposed development caters for 523 no. dwellings comprised of 1, 2, 3 & 4 bed houses, apartments and duplex units, with 95 no. of the total of dwellings proposed to be delivered to as Social & Affordable Housing, representing 10-20% 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 increasing social housing delivery in South Dublin and supportive of the objectives to increase social inclusion.

4.4. Housing Commission Report (2024)

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.

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.

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

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.

The proposed development will make an important contribution in this respect. The provision of 523 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

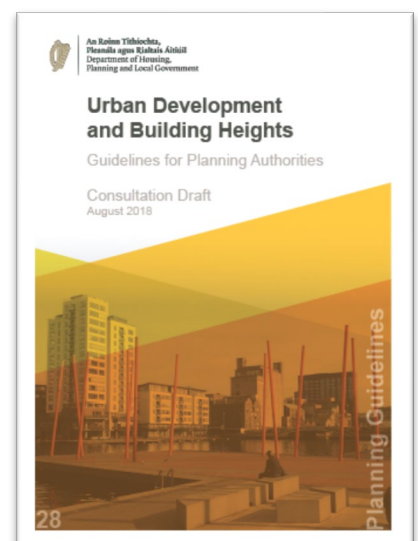
This section of the Statement sets out the proposed development's compliance with a range of relevant Section 28 Ministerial Guidelines and other national guidance documents, namely the following:

- Urban Development and Building Heights Guidelines for Planning Authorities (2018)
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023)
- 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

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

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.

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 (our emphasis added).





The UD&BHG also clearly state that Planning Authorities and An Bord 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.

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"*.

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. 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"*. 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:

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, on the fringes of existing suburban development at Ballycullen-Oldcourt and at the foothills of the Dublin Mountains and is not identified as an area where increased building height will be actively pursued.

The proposed development puts forward a mix of two and three storey dwellings (houses and apartments / duplexes) with 1 no. 3-4 storey building (i.e. Block C) proposed, all at a medium density appropriate to the locational context of the subject site.

The proposed development does seek to put a limit on building height, rather the proposed development seeks to put forward a development which appropriately responds to the sloping topography and characteristics of the area.



It is considered given the density proposed and the site's locational context, at the foothills of the Dublin mountains, 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 subject development is proposed on lands that are zoned for residential land use in the existing South Dublin CDP. In addition, the application site is also subject to the Ballycullen-Oldcourt Local Area Plan (LAP) which forms the basis for the development of approximately 90 hectares (222 acres) along the Ballycullen-Oldcourt fringe, which are in the majority zoned objective "Res-N" for new residential development within the existing CDP. The overall objective of the Ballycullen-Oldcourt LAP is to provide a development framework with residential densities appropriate to the unique location of the lands on the suburban edge of Dublin and at the foothills of the Dublin Mountains. The Ballycullen-Oldcourt LAP provides for the construction of approximately 1,600 additional dwellings (catering for about 4,600 persons). The current proposal for the development of 523 no. residential dwellings and a childcare facility on the subject site is therefore considered an appropriate mix of uses and in compliance with the land-use zoning objectives attached to the site.

For the purposes of the Ballycullen-Oldcourt LAP's phasing strategy, the Plan lands are divided into "eastern" and "western" sides with Ballycullen Road being the point of division. The subject site is located on the western side of the Plan lands. The proposed development is put forward with regard to the phasing strategy of the Ballycullen-Oldcourt LAP and provides for necessary social infrastructure, including for the delivery of: a childcare facility, an ample provision of public and community open space, including for the delivery of Oldcourt Park as defined by the Ballycullen-Oldcourt LAP, the main link street for the Plan lands, and pedestrian / cyclist accesses/infrastructure throughout the development.

The proposed development includes for the provision of 2 no. bus stops along the proposed east-west road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes and further aid a transition to more sustainable transport modes and ease of access to nearby employment and community infrastructure.

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. 175 Citywest-UCD, No. 15/15B Clongriffin – Ballycullen Road and No. 49 Pearse Street – Tallaght (The Square). The proposed development includes for the provision of 2 no. bus stops along the proposed east-west road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes.

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 residential land use for many years, with the CDP and LAP providing a framework for an appropriate form of development. 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. The development of the subject site will present an opportunity to create a new community.

The subject site is unique with its suburban context at the edge of the built-up area allowing views and pedestrian/cyclist links southwards to the mountains. The proposed development includes significant areas of open space, will create a new focal point for the area with a new public park i.e. the proposed "Oldcourt Park", along with considerable retention of existing hedgerows. The proposed layout also provides multiple pedestrian connections through the development.

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 good urban street frontage. Submitted as part of this LRD application, verified views and a landscape visual impact assessment are enclosed to demonstrate that the proposed building heights will not impact on the receiving environment.

In consideration of the receiving environs, the proposed building heights are predominantly 2 – 3 storeys, with one no. stepped 3-4 storey building (Block C) proposed, and the submitted Architectural 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 occupies 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. 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 Architect's Design Statement.

Also enclosed with this LRD planning application submission, a Site-Specific Flood Risk Assessment (SSFRA) is enclosed, which assert that *"the proposed development is not at risk of flooding and will not increase flood risk elsewhere"*. The current proposal has been carefully considered in terms of the treatment of surface water, with no underground tanks proposed and an integrated landscape design with surface water management proposed. Buildings are adequately set back from any flood zones, and address areas of open space. The topography of the site has guided the disposition of varying building height throughout allowing buildings to address new streets and enclose areas of open space, with housing of various typology and height addressing the main east-west link street and open spaces.

The taller buildings in the scheme, i.e. the duplexes and apartment buildings are all carefully positioned addressing streets, adjacent to and enclosing open spaces and at the lowest parts of the site, 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 accommodates 2 and 3 storey detached, semi-detached and terraced houses, duplex units and apartments (with 1 no. 3-4 storey apartment building i.e. Block C proposed), as well as a creche. 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 2, 3 and 3-4 storey houses and apartment / duplex apartment buildings. 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, at the foothills of the Dublin Mountains, the proposed building heights and typologies are put forward with cognisance to the need to maintain views and vistas in the vicinity.

"Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'."

&

“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

CS Consulting has prepared the submitted Daylight and Sunlight Assessment of the proposed development – please refer to same for full details. We note that the submitted assessment states the following:

- 94% of all Living rooms (97% if we include marginals) receive 1.5hrs of sunlight on the test day of the 21st March 87% of rooms are in the high-quality range. This is consistent with the BRE defined “careful layout design” 80% target.
- 75% (85% including marginal) of new provided communal and public amenity spaces pass the BRE requirement. There are compensatory factors relating to those that do not. The tested spaces generally comply with the requirements of the BRE guidelines.
- The site has specific constraints pertaining to its orientation and location which directly effects the daylight/sunlight opportunities within the proposed development. The architect has endeavoured to design apartment units with good access to light given that this is an urban infill site. Where site constraints have made attaining the relevant standards unachievable, compensatory measures have been made.
- The application (in terms of Development Performance) generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BR209 - 2022).

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 three storeys, with one no. stepped 3-4 storey building (Block C) proposed, this assessment is not considered to be required. Notwithstanding same, this LRD application is be accompanied by a fully detailed Environmental Impact Assessment Report (EIAR) which has considered factors such as noise, air and climate – please refer to same.

“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 for maximum building heights of three storeys, with one no. stepped 3-4 storey building (Block C) proposed, this assessment is not considered to be required. Notwithstanding same, this LRD application is be accompanied by a fully detailed Environmental Impact Assessment Report (EIAR) which has considered factors such as noise, air and climate – please refer to same.



“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 three storeys, with one no. stepped 3-4 storey building (Block C) proposed, 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 three storeys, with one no. stepped 3-4 storey building (Block C) proposed, this assessment is not considered to be required.

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

This LRD planning application is accompanied by an Architectural Design Statement prepared by Davey + Smith Architects and a Landscape Design Statement prepared by Gannon + Associates. This LRD application is accompanied by an Environmental Impact Assessment Report (EIAR) which has considered factors such as archaeology and cultural heritage – please refer to same.

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

An Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) has been prepared by Enviroguide Consulting for the proposed LRD on the subject site. These are enclosed as separate standalone documents – please refer to both for full details.

The AA Screening Report concludes that *“upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- North Dublin Bay SAC
- South Dublin Bay SAC
- South Dublin Bay and River Tolka Estuary SPA
- North Bull Island SPA
- Wicklow Mountains SPA

*However, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **cannot be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- Glensmole Valley SAC
- Wicklow Mountains SAC

Glensmole Valley SAC is located along the Ballinascorney Road, and as such the potential for significant impacts via inadvertent spread of invasive species by construction related traffic (commercial and private vehicles) could not be ruled out. In addition, it is considered that the likelihood for indirect impacts via potential water quality deterioration within the Dodder River on any otters associated with the Wicklow Mountains SAC that may inhabit the Dodder River



in proximity to the Site, cannot be excluded in the absence of site-specific detail on best practice surface water protection measures.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded. Thus, there is a requirement to proceed to Stage 2 of the AA process; and a NIS has been prepared and accompanies this submission under separate cover”.

A Natura Impact Statement (NIS) has been prepared and is included as a separate document – please refer to same. The enclosed NIS concludes that

“This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed LRD at Bohernabreena, Oldcourt, Ballycullen, Co. Dublin, on the following European Sites:

- *Glenasmole Valley SAC (001209)*
- *Wicklow Mountains SAC (002122)*

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction and operation, on the integrity and qualifying interests of the above European sites, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extent of Glenasmole Valley SAC or Wicklow Mountains SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site”.

The proposed development has also been subject to a comprehensive Environmental Impact Assessment Report (EIAR). The 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 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 523 no. dwellings on a gross site area of c. 20.4 hectares and, therefore, equates to a proposed gross density of c. 26 dwellings per hectare.

We note that the Sustainable Residential Development in Urban Areas Guidelines have been replaced / superseded by the 2024 Sustainable Residential Development and Compact Settlements Guidelines.

Based on the guidance of Appendix B "Measuring Residential Density" of the 2024 Sustainable Residential Development and Compact Settlements Guidelines (hereafter 'Guidelines'), it is considered that the proposed development puts forward a net density of c. 42 dwellings per hectare.

In the context of the 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.
- 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 proposed east-west main link street traversing the centre of the site, (b) wayleaves for pylon corridors and watermains, as coloured yellow on the submitted site layout plan and (c) retention of hedgerows and topography, have all been discounted from the gross site area of c.20.4Ha, resulting in a net developable area of c.12.5Ha. This is clearly illustrated on the submitted site layout plan (drawing no. MP09 Proposed Density Map).

The proposed development has a net density of c. 42 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 and avoids mono-type building typologies - as demonstrated in the submitted drawings and Architectural 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 2: Consistency with SPPRs of the UD&BHG.

Evaluation of Consistency with the UD&BHG

Given all the foregoing as set out in Section 5.1 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, 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.

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

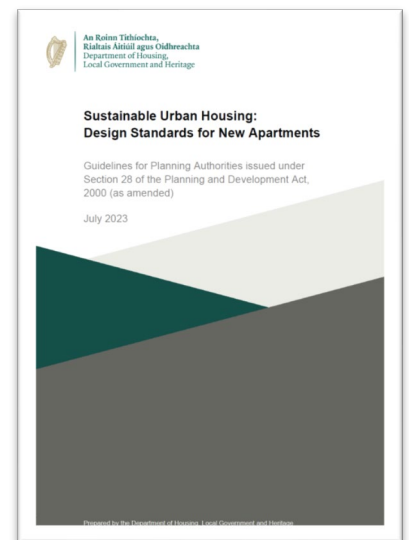
The Sustainable Urban Housing Design Standards for New Apartments (2023) guidelines were initially approved by the Government in 2015; however, they have been subsequently updated / amended, with the most up-to-date version of being the July 2023 version.

The Sustainable Urban Housing: Design Standards for New Apartments guidelines (hereafter “the 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.

The 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 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.

The 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.

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.





The 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

The 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 Apartment Guidelines

The proposed development consistency with the 7 no. SPPRs of the Apartment Guidelines is detailed in Table 3 below:

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 523 no. residential dwellings, comprised of 255 no. 2, 3 & 4 bed detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks.

The proposed 268 no. apartment / duplex units are further broken down into:

- 51 no. one-bed units,
- 107 no. two-bed units and
- 110 no. three-bed units.

The number of proposed one-bed apartment / duplex units represents c.19% of the total apartment / duplex mix, and c. 10% of the overall proposed quantum of housing within the development. There are no studio units proposed. The proposed development is therefore compliant with SPPR 1 of the 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 Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 2 of the 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 Davey + Smith Architects, all the proposed apartment / duplex units meet with and/or exceed the minimum apartment floor areas stated in SPPR 3 of the Apartment Guidelines. The proposed development is therefore compliant with SPPR 3 of the 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 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**

Of the proposed 268 no. apartment / duplex units, approximately 3 no. units (c. 1%) 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. Refer to both the submitted HQA and section 7.11 of the enclosed Planning Statement for details.

The proposed development is therefore compliant with SPPR 4 of the 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 Davey + Smith Architects for full details.

The proposed development is therefore compliant with SPPR 5 of the 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 (8 no.) accessed from a single core is in Block C. Please refer to the submitted block plans prepared by Davey + Smith Architects for full details.

The proposed development is therefore compliant with SPPR 6 of the 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 Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 7 of the Apartment Guidelines.

Table 3: Consistency with SPPRs of the Apartment Guidelines.



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

Section 2.4 of the Apartment Guidelines identifies of 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 “Peripheral and/or Less Accessible Urban Location” with the nearest existing bus stop being located over 1 km away from the eastern end of the site. Such locations are defined by the Apartment Guidelines as being “*generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including: Sites in suburban development areas that do not meet proximity or accessibility criteria*”.

The above consideration is considered applicable to the proposed development, notwithstanding the fact the proposed design accommodates 2 no. future/potential bus stops along the proposed main link street running through the development. It should also be noted the Apartment Guidelines state the range of locations outlined in the guidelines is not exhaustive and will require local assessment by the Planning Authority. We also note in their LRD Opinion (Ref. LRDOP001/24) that the Planning Authority confirms that the subject site is not located in an “accessible” location.

The proposed development puts forward an overall gross density of c.26 units per hectare, however, by applying guidance for calculating density, e.g. excluding the east-west link street, areas that cannot be developed e.g. due to hedgerow protection, wayleaves etc., the net density of the proposed development is c.42 units per hectare, with proposed apartment / duplex units representing c.51% of the overall dwelling mix and, therefore, the proposed development is considered to comply with the above stated guidance of the Apartment Guidelines and is an appropriate location for apartment development.

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

The quantum of 2 bed / 3 person units i.e. 11 no. such units proposed, does not exceed 10% of the overall apartment provision, equating to 4% of the overall apartment / duplex type units proposed (i.e. 268 no. units), and equating to 2% of the overall development of 523 no. units.



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 19,896sq.m. An additional 10% of same would equate to 21,885.6sq.m. The 268 no. proposed apartment / duplex units, has a total floor area of 23,449.47sq.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 Davey + Smith 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 Davey + Smith 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 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 Davey + Smith Architects, an ample provision of communal amenity 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	51	5	255
Two Bed (Three Person) Unit	11	6	66
Two Bed (Four Person) Unit	96	7	672
Three Bed Unit	110	9	990
Total	268	-	1,983m²

As detailed in table above, the proposed development has a requirement for the provision of 1,983sq.m of communal open space. The proposed development puts forward a total provision of 5,505sq.m of communal open space and, therefore, complies with the above requirement.

The communal open space provision for the development is provided in 18 no. individual communal open space areas located adjacent to each proposed apartment and duplex block, ranging in various sizes from c.404sq.m (in Neighbourhood Zone 2) to c.695sq.m (in Neighbourhood Zone 4), with the 18 no. spaces totalling 5,505sq.m. In addition, communal open space is also provided at roof level (1st floor) of Block D, providing a space of c.38.5sq.m for the use of the residents of that building.

The location and orientation of each communal open space has 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 Davey + Smith drawing no. MP07 – Proposed Open Space.



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 6.5) prepared by Gannon & Associates Landscape Architects and enclosed with in the application. Given all the foregoing, it is considered that the proposed development is compliant with the 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 730 no. cycle spaces for the 268 no. proposed apartment / duplex units, which is considered appropriate and generally in compliance with the above stated standard. Refer to section 3.4.2 & table 6 of the submitted TTA for details. The development designs allow for an increase in the number of cycle spaces. There will be a total of 1,268 no. cycle parking spaces provided for the entire development.

Section 4.24 of the Apartment Guidelines states for "Peripheral and/or Less Accessible Urban Locations" car parking shall be provided at a general benchmark guideline of 1 no. car parking space per unit, together with an element of visitor parking "*such as one space for every 3-4 Apartments*".

Statement of Consistency

The proposed development consists of 523 no. dwellings, comprised of 255 no. houses and 268 no. duplex units and apartments. The proposed development provides for a total of 746 no. car parking spaces, and includes 66 no. visitor car parking spaces, and 7 no. spaces for the creche. Overall, 673 no. long term the car parking spaces are afforded to the proposed 523 no. dwellings which equates to a ratio c.1.29 spaces per dwelling. Refer to section 3.4.1 of the submitted TTA for details.



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 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 Davey + Smith 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 4: Consistency with the Apartment Guidelines.

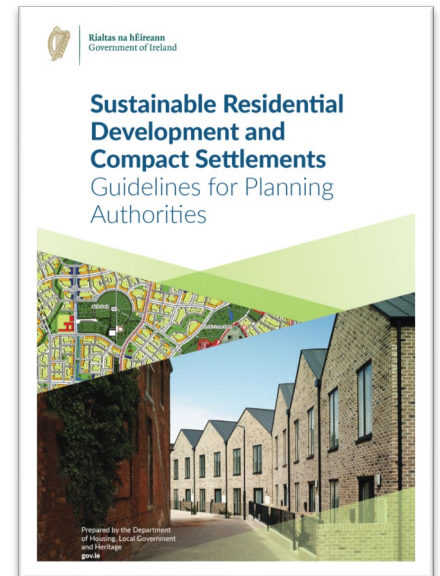
Evaluation of Consistency with the 2022 Apartment Guidelines

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 Apartment Guidelines As such, in light of all of the foregoing and having regard to the development's compliance with the SPPRs of the 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.

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

5.3.1. Published in January 2024, the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (hereafter “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 Guidelines, in the performance of their functions. The Guidelines replace the 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.

The 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 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 Guidelines can be applied. To date, this has not been published.



5.3.2. The 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.

5.3.2 The 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)”*.



5.3.3 Section 2.1.2 of the 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)”*.

5.3.4 For Dublin, the Guidelines provide density ranges which is broken down into different areas and the subject site can be described (as per Table 3.1 of the Guidelines) 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].

5.3.5 The 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 Guidelines refer to Table 3.8 (copy below & overleaf) which sets out definitions for terms used to define accessibility to allow for consistent application, with the Guidelines noting that *“the characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required”*.

Table 3.8: Accessibility

<p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> • 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.
<p>Accessible Location</p> <ul style="list-style-type: none"> • 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.
<p>Intermediate Location</p> <ul style="list-style-type: none"> • 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.
<p>Peripheral</p> <ul style="list-style-type: none"> • 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 5: Table 3.8 of the Guidelines

5.3.6 Taking into account the locational context of the subject site, as currently being located within 1-2km walking distance of existing public transport services, but also considering the proposed development may accommodate 2 no. future bus stops on the proposed east-west link street, it is put forward that the subject site is in an "Intermediate Location".

5.3.7 Chapter 3 of the 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 6: Policy and Objective 3.1 of the Guidelines

5.3.8 Chapter 4 of the 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 7: Policy and Objective 4.1 of the Guidelines

5.3.9 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

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 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.*

5.4.10 The 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.

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 8: Policy and Objective 4.2 of the Guidelines

5.3.11 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 a "City - Suburban/Urban Extension" and is located in an "Intermediate Location" respectively. The subject site is currently within a 1-2km walking distance of existing public transport services, with the proposed east-west link street accommodating 2 no. future bus stops that may provide future public transport (bus) services. 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.

The development provides for a net density of c. 42 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including existing and potential future 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, the Apartment Guidelines, and the Housing for All programme. 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 (with the proposed development deemed to be DMURS compliant by the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers) 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.

5.3.12 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:

5.3.12.1 Separation Distances:

Section 5.3.1 of the 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 9: SPPR 1 of the Guidelines

5.3.12.1 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.

5.3.12.2 Private Open Space:

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 10: SPPR 2 of the Guidelines

5.3.12.3 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 the HQA – please refer to same.

5.3.12.4 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 maximum 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 11 – SPPR 4 of the Guidelines

Statement of Consistency:

The application site is located at the edge of the suburban / built up area of the County, at the foothills of the Dublin Mountains. The topography of the site, along with the proposed, extensive retention of existing vegetation of site, such as hedgerow and townland boundaries, and landscape character of the receiving environs has influenced the design and layout of the proposed development. The LAP requires the delivery of “Oldcourt Park” as a phasing requirement for the western part of the Plan lands, with the landscape design incorporating SuDS proposals. Taking all of the aforementioned into account, the overall open space provision on site equates to c.7.4Ha, which represents c. 36% of the gross site area of site and is considered to comply with the policy and objective 5.1 where a higher proportion of open space may be required where significant landscape features are being retained.

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

Section 5.3.4 of the 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 12 – SPPR 4 of the 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 proposed development caters for 746 no. car parking spaces provided for in a mix of on-street and on-curtilage parking. The proposed car parking quantum equates to a ratio of c.1.29 spaces per dwelling, which accords with the maximum standard of 2 space per dwelling in an intermediate location.

Further details of the proposed car parking and rationale for the proposed quantum are set out in the enclosed TTA (Section 3.4.1) prepared by Pinnacle Consulting Engineers – please refer to same.

5.3.12.6 Bicycle Parking and Storage

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 4 - SPPR 5 of the Guidelines

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

Regarding bicycle parking provisions for the development, it is considered the proposed 255 no. houses will be capable of accommodating bicycle parking within the curtilage of the property, with mid-terrace units to be provided with secure bicycle stores on their driveways, this is illustrated on the enclosed Davey+Smith drawing no. MP22 "Proposed Bikes Location" – please refer to same.

Regarding the proposed duplex blocks (Duplex Block Types A, B, C, D, E & F) and the proposed "E" type "Urban Duplex / House", it is considered the nature / design of these building typologies will allow the proposed ground floor units to accommodate bicycle parking within the curtilage of the property i.e. within the unit itself or securely located within the ground floor terrace provided for each unit. The proposed apartments and duplex units are afforded 609 no. long term bicycle parking spaces and 140 no. short-term / visitor spaces.

In total, the proposed development will require 609 no. long-term parking spaces for the proposed apartments and duplex units and 140 no. short-term spaces i.e. a total provision of 749 no. parking spaces.

For the overall development, a total of 1,268 no. bicycle parking spaces are provided. Please refer to the submitted TTA for details (section 3.4.2).



5.3.12.6 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. Note the Operational Waste Management Plan is enclosed as an Appendix to Chapter 13 of the submitted Environmental Impact Assessment Report, while the Property Management Strategy Report is enclosed as a standalone document.

5.3.12.7 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 CS Consulting.

5.3.13 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 5 – 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. 20.4Ha, 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:

- Area occupied by the proposed east-west main link street that traverses the site and will connect Oldcourt Road to Bohernabreena Road, as identified in the CDP Six Year Road Programme and on zoning map no. 9 – this area equates to 8,214sq.m,
- Areas occupied by wayleaves accommodating ESB overhead wires/pylons and Irish Water/Uisce Éireann watermains – this area equates to 43,531.1sq.m,
- Areas of environmental sensitivities that cannot be developed, i.e. protection of hedgerows and ditches, buffers from the top of the bank of any streams and watercourses on the site, wetland areas etc. – this area equates to 27,664.5sq.m,
- Total area excluded from gross site area is 79,409.6sq.m / 7.94Ha,
- Net developable area is therefore 12.46Ha (i.e. 20.4Ha – 7.94Ha = 12.46Ha),
- Resultant net density = 523 no. units / 12.43Ha = 42 units per hectare net.

We note that in the LRD Opinion issued by the Planning Authority (under Ref. LRDOP001/24) the following is stated in relation to the calculation of net density: *“the Planning Authority accepts the exclusion of (i) high-voltage power lines and mandated no- build areas to same (ii) the link road, including street trees to verge and footpath as well as (iii) identified hedgerows of biodiversity importance that are to be retained for green infrastructure functions”*. Based upon this feedback, the above calculation has been prepared and represents the only factors that have been calculated to achieve the net density of development that is now put forward for permission. In addition, we submit drawing no. MP09 “Overall Lands – proposed Density Map”, prepared by Davey + Smith Architects, which identifies the areas within the red line boundary of the subject LRD planning application that have been discounted to calculate the net density of the proposed development – please refer to same.



5.3.14 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 Oldcourt Road to the east, Dodderbrook to the north and Bohernabreena Road to the west. 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, as affirmed by Pinnacle Consulting Engineers. The alignment of open spaces and creation of pedestrian linkages from the proposed development to e.g. Dodderbrook and Ballycullen Green 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.1.29 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 (1,268 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 objectives 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 and 4 bedroom houses within the proposed development, comprised of:

- 49 no. 1 bedroom apartments & duplex units (9%)
- 105 no. 2 bedroom apartments & duplex units (20%)
- 114 no. 3 bedroom apartments & duplex units (22%)
- 61 no. 2 bedroom houses (12%)
- 160 no. 3 bedroom houses (31%)
- 34 no. 4 bedroom houses (6%)

The proposed dwelling mix is 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: 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.*



The following should be noted:

The proposed development of 523 no. dwellings includes a total of 274 no. 3 bedroom units (114 no. 3 bed duplex units + 160 no. 3 bed houses) which equates to c.52% 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. 215 no. in total, equating to c.41% 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, abutting recently completed phases of residential development of the Ballycullen – Oldcourt LAP lands. 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 east-west link street and “Oldcourt Park”.

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 application, 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.

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

(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 and main public road connections.

(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) ensures 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 local area is undergoing transformation with the delivery of new housing taking place in recent 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. Four distinct character areas / "Neighbourhood Zones" are proposed across the entire scheme.



Each of the four character areas have 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 east-west link street and by the path of the existing pylon corridor that traverses the site. Access to each of the character areas is provided off the main link street.

Landscape design and a connected open space strategy connects each of the neighbourhood zones with a legible “sense of place” as one moves along the link street with strong building frontage or active community spaces on either side.

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.

The 2 and 3-storey houses provide a sense of continuity with the surrounding context, while prominent blocks at key locations and urban edges present the development when approaching from along the central, main link street. Efforts have been made to design the interface between buildings and the public realm to promote accessibility and usability while maximising passive surveillance and fronting of the same.

5.3.14 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 5.3 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 SPPRs 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.

5.4 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.

Statement of Consistency with the 2001 Guidelines

The proposed development consists of 523 no. dwellings, comprised of:

- 255 no. houses (61 no. two bed units, 160 no. three bed units and 34 no. four bed units),
- 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks,
- 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks.

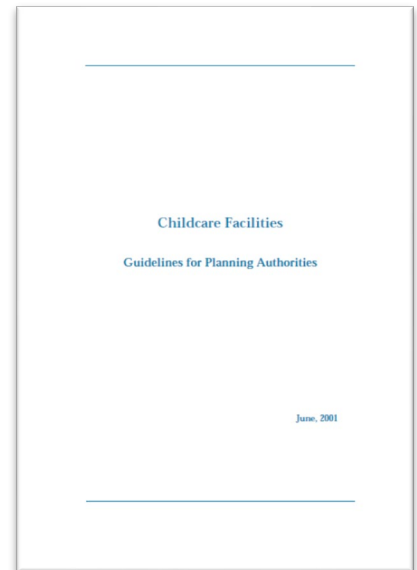
It is noted section 4.7 of the Apartment Guidelines states, in relation to childcare facilities: *“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with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

Based on the above, by discounting the 51 no. 1 bedroom apartments & duplex units contained in the overall proposed development, the proposed development caters for 472 no. dwellings for the purposes of assessing the childcare requirements. Based on the provision of 20 no. childcare places for every 75 no. new dwellings, the proposed development therefore has a requirement to provide for a childcare facility catering for 126 no. childcare places.

The proposed childcare facility has been designed to be of a size capable of catering for 126 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. 126 childcare spaces would need to be a minimum of c. 292sq.m net floor area. An area of associated outdoor play space, to the rear of the facility has also been provided for, of c.63sq.m.

The proposed floor area of the crèche i.e. 457sq.m therefore exceeds the minimum requirement as set out in the 2001 Childcare Facilities – Guidelines for Planning Authorities by c.165sq.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 126 no. childcare spaces.

Given all the foregoing as set out in Section 5.4 of this Statement, it is respectfully submitted the proposed development is compliant with the 2001 Guidelines for the provision of childcare facilities in new developments. As such, and having regard to the development’s compliance with the 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.

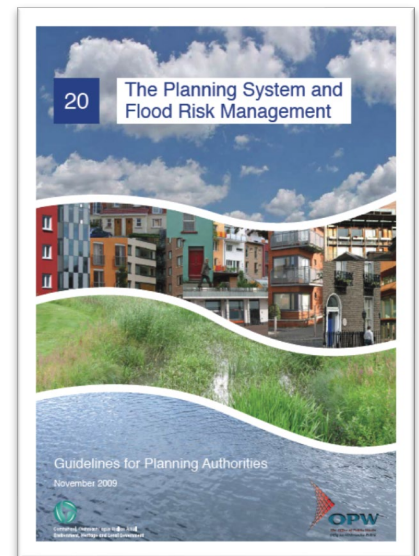


5.5 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).

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 principal 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.

Statement of Consistency with the FRMG

A Site-Specific Flood Risk Assessment (SSFRA) has been undertaken of the proposed development, prepared by Kilgallen and Partners Consulting Engineers, and is enclosed as part of this LRD planning application.

The submitted SSFRA confirms that a site walkover was carried out by the author of the SSFRA to allow a direct inspection of drainage features. Fluvial drainage features are consistent with those shown on OS mapping, suggesting there have be no significant changes to the drainage regime in recent times. The channels of both streams vary considerably as they flow through the site; being shallow and ill-defined at some locations and relatively deep and well-defined at others. Field culverts appear undersized and in many cases are in poor repair. Both streams include heavy vegetation. Flows were low in both streams. Many of the field boundaries have drainage ditches which connect to the streams.

The submitted SSFRA asserts that the condition of the streams observed during the site walkover suggest the channels might not have sufficient hydraulic capacity to convey larger flows that that would occur during extreme rainfall events, leading to overtopping at locations where the channels are poorly defined, inadequately culverted or heavily vegetated.

The steep gradient through the site eliminates the potential for floodplain storage within the site; instead, overtopping water will continue downstream as overland flow before merging into the



streams at a lower point. The result is that during extreme events, the lands adjoining the streams act as overflow channels. The risk from overtopping flow can be mitigated by maintaining the existing stream channels and, where these are of inadequate capacity, raising the ground adjoining the channel locally to provide the additional hydraulic capacity. Figures 4.4 and 4.5 of the enclosed SSFRA show the channel cross-sections required to convey these flows (based on the lowest bed-gradient in each stream), with calculations in this regard provided in Appendix C of the SSFRA.

The proposed development includes the installation of culverts on both streams and on several drainage ditches. The locations of these are shown in Figure 4.6 of the enclosed SSFRA. Each culvert has been assessed and is of sufficient hydraulic capacity to convey peak flows, with calculations in this regard are provided in Appendix D of the SSFRA.

The submitted SSFRA asserts that subject to the implementation of the mitigation measures described in sections 4.3 and 4.4 that the development will not be at risk from fluvial flooding and will not increase fluvial flood risk elsewhere. *“Accordingly, the proposed development is considered appropriate from the fluvial flood-risk perspective”*.

In terms of pluvial flood risk, the submitted SFRA asserts that from a site walkover that the site is on steeply sloping ground and is vulnerable to overland flow entering the Site from the higher ground to the south. No drainage pipes entering were observed. The SSFRA states that proposed mitigation measures to mitigate pluvial flood risk should be incorporated into the proposed development:

- *“where the proposed development intercepts drainage ditches, the drainage paths should be diverted to an appropriate outfall (it is noted that the SUDS regime referred to in Section 3.3 achieves this by incorporating intercepted drainage ditches into swales);*
- *where water-vulnerable elements of the development adjoin higher ground (for example, boundary walls), intercepting drains (such as filter drains or swales) should be installed to intercept overland flow from the higher ground;*
- *intercepting drains should be installed along all sections of the site boundary which adjoin higher ground (there are already drainage ditches along parts of the south boundary and the drainage paths these provide should be maintained)”*.

The SSFRA asserts that subject to the implementation of the mitigation measures described above, the development will not be at risk from pluvial flooding and will not increase pluvial flood risk elsewhere. Accordingly, detailed assessment is not required.

The SSFRA has also considered climate change and notes that the measures to ensure the stream channels are each of sufficient capacity to convey peak fluvial flows. The performances of these channels were analysed for peak flows in the 1% AEP scenario based on a 30% climate change factor. These analyses found that even in the High-End Future Scenario (HEFS) each channel has sufficient capacity to convey peak flows. In addition, the SSFRA describes the assessment of the various culverts proposed in the development. The performances of these culverts were also analysed for peak flows in the 1% AEP scenario based on a 30% climate change factor. These analyses found that even in the HEFS, each has sufficient capacity to convey peak flows.

In terms of existing drainage infrastructure, the SSFRA states that because of its steeply sloping terrain, the site will not be at risk of flooding even in the event of flow in the watercourse downstream becoming obstructed during a significant rainfall event (for example if a culvert downstream of the Site became blocked). In such a scenario, water would overtop the channel



and continue downstream and would not surcharge onto the proposed development.

The SSFRA also states that the surface water drainage system has been designed to capture, store and discharge surface water run-off from rainfall events for all return periods up to and including 100 years (with an allowance for climate change). Notwithstanding this, a blockage could occur in the surface water drainage system, leading to the risk of water rising in upstream manholes to the point where the manhole overtops and water overflows on to the surrounding ground. The proposed development provides routes for the conveyance of such overflows which ensure that buildings would not be at risk of flooding in this scenario.

Section 8 of the submitted SSFRA provides details of the Justification Management Test that was carried out in accordance with the FRMG, with the proposed development passing the required Development Management Justification Test.

As an inland site upstream of tidal influences and possible wave action, the Site is not subject to coastal flood risk and so this mechanism does not need to be considered further in this assessment. The assessment therefore considered flood-risk from the following mechanisms:

- Fluvial;
- Pluvial;
- Groundwater;
- Drainage Infrastructure

For Fluvial and Pluvial flood risk, mitigation measures are recommended, as outlined above, and Subject to the implementation of these measures, the development was considered to not be at risk from either fluvial flooding or pluvial flooding and to not give rise to an increase in fluvial and pluvial flood risk elsewhere.

In terms of groundwater, the SSFRA asserts that initial assessment of existing flood risk indicators indicates the site is not at risk from groundwater flooding.

Taking all of the forgoing into account, the submitted 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”*.

Please refer to submitted SSFRA by Kilgallen & Partners, Consulting Engineers for full details.

5.5 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”).

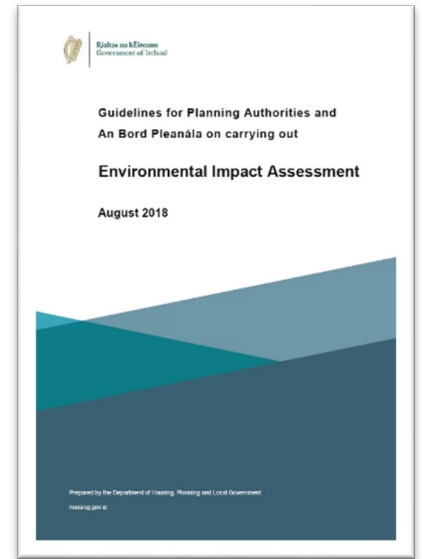
The EIA Guidelines provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities. Both An Bord Pleanála and the relevant local authority are required to have regard to the EIA Guidelines in the performance of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

Statement of Consistency with the EIA Guidelines

The proposed development is comprised of 523 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 5.7 to 5.12 provide details of other relevant planning guidance documents (that are not Section 28 Ministerial Guidelines but) to which the development has had regard to / complies with).



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

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

The Quality Housing 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 Quality Housing 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.

Table 6 below details the 7 no. essential requirements for new residential developments detailed in the Quality Housing Guidelines, along with the development’s consistency with same.

Requirement	Statement of Consistency
<p>1. Socially & Environment Appropriate</p> <p><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>	<p>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, particularly the proposed C type house which illustrate possible future attic conversion.</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 and communal open spaces which are 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 dwelling within the development also ensuring areas of public and communal 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 – refer to the submitted landscape design rationale for details of same.</p> <p>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 dwellings / buildings are two or three storeys in height (with 1 no. 3-4 storey building proposed), 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</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 is 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><i>meet changing needs of residents during the course of their lifetime."</i></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>Central to the proposed layout is the provision of a segregated pedestrian / cycle track running along the route of the main east-west link street running through the development. 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, e.g. Dodderbrook.</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, thus 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 with this LRD planning application. As detailed within the road engineering drawings and the Traffic and Transport Assessment, the proposed road 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 by proposed dwellings/buildings for enhanced sense of safety and will be well-lit as far as practically possible.</p>
<p>5. Affordable</p> <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. Please refer</p>



	<p>to the submitted Taking-in-Charge drawing no. MP08 prepared by Davey+Smith Architects.</p> <p>In addition, a Building Life Cycle Report, including for measures to reduce costs for future residents, has been prepared and is submitted as part of this LRD planning application. Upon a grant of 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 development.</p>
<p>6. Durable</p> <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>
<p>7. Resource Efficient</p> <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, maintenance and management of the dwellings should be minimised."</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:</p> <ul style="list-style-type: none">(a) the existing pattern of development in the area,(b) the objectives of both the South Dublin County Development Plan (2022-2028) & the Ballycullen-Oldcourt LAP (2014),(c) the guidance of the Sustainable Residential Development & Compact Settlements Guidelines (2024) in relation to density,(d) the sloping topography of the site, and(e) access to existing public transport. It is therefore considered that proposed development achieves an appropriate level of density, taking into account the existing context and constraints of the site. <p>The future population of the development will be supported through the provision of additional public transportation routes, with the proposed development accommodating the provision of 2 no. potential bus stops along the proposed main link street, supporting a transition to more sustainable transport means.</p> <p>All proposed dwellings / buildings are designed and will be constructed to the most up-to-date Building Regulations standards, with proposed</p>

	<p>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. The submitted Building Life Cycle Report 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 1: Consistency with the Quality Housing for Sustainable Communities – Design Guidelines.

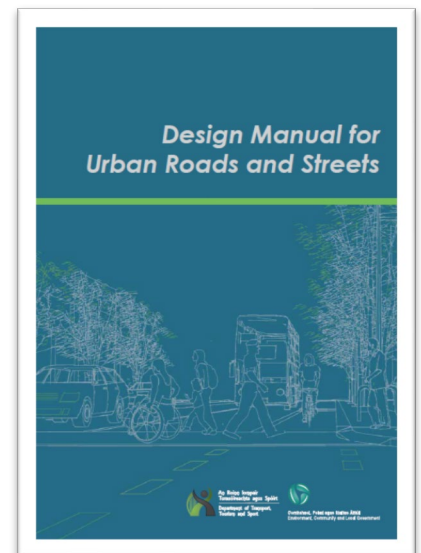
Evaluation of Consistency with the Quality Housing for Sustainable Communities – Best Practice Guidelines.

Given all the foregoing as set out in Section 5.7 of 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.

5.7 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”*.





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 proposal is for sustainable residential development with linkage to the adjacent urban areas and transport hubs to the north of the site.

The layout for the proposed housing scheme has been carefully developed to provide smaller residential clusters which centre on well landscaped public open spaces located throughout the development. There is pedestrian linkage to the open spaces and provides permeability through these spaces.

The proposed road layout provides for both road, cyclist and pedestrian connectivity with the proposed layout creating a clear system of roads and pavements which are easy to navigate for by drivers, cyclists and pedestrians. The design of the road and pavement alignment has been carefully designed to introduce curvature into the horizontal alignment which acts as a traffic calming measure throughout the scheme. The designers have avoided long straight sections of roadway. Access to and from the site is through a new DMURs compliant access junction located off the Oldcourt Road and Bohernabreena Road. The design of these junctions has been selected to ensure sight visibility both from the junction and for forward visibility from other road users on the Oldcourt Road and Bohernabreena Road.

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.

The proposed development caters for the completion of the main link street for the Ballycullen-Oldcourt LAP lands, connecting the existing Oldcourt (R113) and Bohernabreena Roads. The development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

Vehicular connections are proposed to the existing Dodderbrook estate to the north, at Dodderbrook Lawn and Dodderbrook Rise, as well as vehicular access points to the east and west of the development (linking to Bohernabreena Road and, via adjoining development, Oldcourt Road (R113)).

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 details 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 neighbourhood 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.

The roads alignment design throughout the proposed development consists of short, curved stretches of roadway in order to slow traffic down. These features create a passive method for controlling the speed of the vehicular movements throughout the development. The development has been designed to include car parking for the apartment development, crèche and housing units. The apartment car parking comprises on-street parking. However, parking for homeowners in the development shall be predominantly within their front of house areas within their site boundary with some on-street parking. This has been specifically designed to align with homeowners' preference to have their private vehicles positioned within the limitations of the individual site ownership and to avoid a feeling of over dominance associated with having the majority of parking located on-street.

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.

Raised tables located along the road alignment have been incorporated throughout the proposed development at specific locations to promote lower speed limits i.e. at junctions with the Link Street where pedestrians and cyclists cross. These raised tables also act as providing pedestrian crossing point's at-grade. These raised crossings shall provide the pedestrian and cyclists with a sense of priority over vehicular movements at these interfaces. While footways adjacent to the roads have been provided through the development, a further independent network of footways is included through the open spaces away from vehicular routes.

Pedestrian crossing points have been located along the entire road alignment throughout the development to allow the pedestrian to be afforded ease of movement through the proposed development and all desire lines have been carefully designed and incorporated into the scheme. Please refer to the submitted Pinnacle Engineering Drawing No. P211102-PIN-XX-DR-D-101-105-S1 for details of the Internal Road Network.

Public open space areas are passively surveyed by proposed dwellings/buildings for enhanced sense of safety for pedestrians.

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 housing development for 523 units has been designed using a coordinated design team inclusive approach between architect, engineers, planning consultants and landscape designers taking into account considerations from all disciplines and specialists. The design team has progressed through several iterations of the layout in line with comments received from each discipline while also taking into consideration feedback received from South Dublin County Council as part of the pre-planning process on this site to arrive at a solution which meets the guidance outlined in the DMURS. The resulting layout provides a high standard development which incorporates spatial requirements and takes into account relevant plans and policies. Therefore, the designers are satisfied that the now proposed design addresses all issues raised by the various disciplines and following integration of all authorities and design members meets the requirements / guidance of DMURS.

Table 5: Consistency with DMURS.

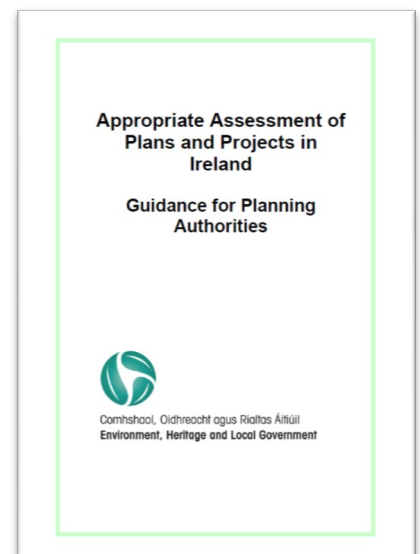
Evaluation of Consistency with DMURS

Given all the foregoing as set out in Section 5.8 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.

5.8 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.





Statement of Consistency with the AA Guidelines

An Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) for the development has been prepared by Enviroguide Consulting for the proposed LRD on the subject site.

The European sites relevant to the site are as follows:

- North Dublin Bay SAC No. 000206 – c.15km from subject site
- South Dublin Bay SAC No. 000210 – c.11km from subject site
- Glenasmole Valley SAC No. 001209 – c. 1.2km from subject site
- Wicklow Mountains SAC No. (002122) – c. 4km from subject site
- South Dublin Bay and River Tolka Estuary SPA No. 004024 – c. 11km from subject site
- North Bull Island SPA No. 004006 - c. 15km from subject site
- Wicklow Mountains SPA No. 004040 - c. 4km from subject site

In accordance with the Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Appropriate Assessment of the proposed development has been prepared by Enviroguide Consulting and is submitted as a separate document - please refer to same. The submitted AA Screening Report asserts that the proposed development has been assessed, taking into account:

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

The AA Screening Report concludes that *“upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- North Dublin Bay SAC
- South Dublin Bay SAC
- South Dublin Bay and River Tolka Estuary SPA
- North Bull Island SPA
- Wicklow Mountains SPA

*However, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **cannot be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- Glenasmole Valley SAC
- Wicklow Mountains SAC

Glenasmole Valley SAC is located along the Ballinasorney Road, and as such the potential for significant impacts via inadvertent spread of invasive species by construction related traffic (commercial and private vehicles) could not be ruled out. In addition, it is considered that the likelihood for indirect impacts via potential water quality deterioration within the Dodder River on any otters associated with the Wicklow Mountains SAC that may inhabit the Dodder River in proximity to the Site, cannot be excluded in the absence of site-specific detail on best practice surface water protection measures.



On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded. Thus, there is a requirement to proceed to Stage 2 of the AA process; and a NIS has been prepared and accompanies this submission under separate cover”.

A Natura Impact Statement (NIS) has been prepared and is included as a separate document – please refer to same. The enclosed NIS concludes that

“This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed LRD at Bohernabreena, Oldcourt, Ballycullen, Co. Dublin, on the following European Sites:

- *Glenasmole Valley SAC (001209)*
- *Wicklow Mountains SAC (002122)*

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction and operation, on the integrity and qualifying interests of the above European sites, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

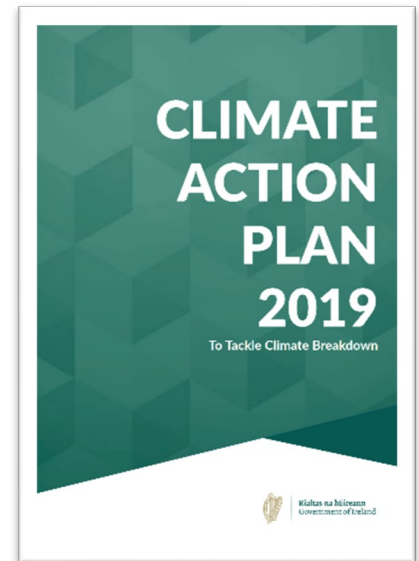
Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extent of Glenasmole Valley SAC or Wicklow Mountains SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site”.

5.9 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 that 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.



Evaluation of Consistency with the Climate Action Plan 2019

The proposed medium 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 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. Furthermore, the design of the development provides for future bus stops and therefore potential additional public transport services directly accessing and serving the proposed development.

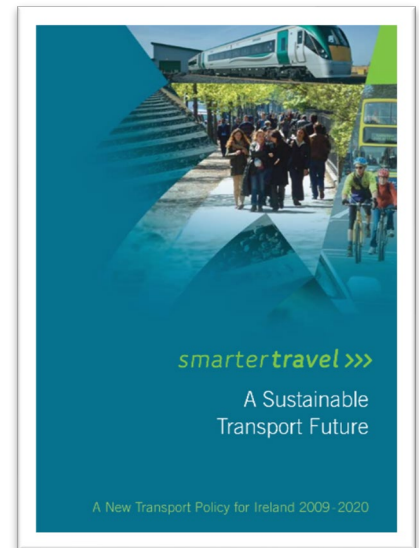
The proposed development has been designed to retain existing trees and vegetation, as much as feasibly possible, and includes for new native planting to supplement any loss which will add biodiversity in the area and will help with the decarbonisation of the environment. An ample provision of open space is also provided (c. 7.38Ha of public open space and c.5,505 sq.m of communal open space) as part of the proposed development, including the delivery of "Oldcourt Park".

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.

5.10 Smarter Travel – A Sustainable Transport Future (2009-2020)

The Smarter Travel – A Sustainable Transport Future / 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.



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 LRD, a medium density residential development, located proximate to existing local neighbourhood facilities and public transport routes. The proposed development will be well serviced by public transport and proposes to accommodate future provision of 2 no. new bus stops along the main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

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.1.29 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.

5.11 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.

Evaluation of Consistency with the SMP

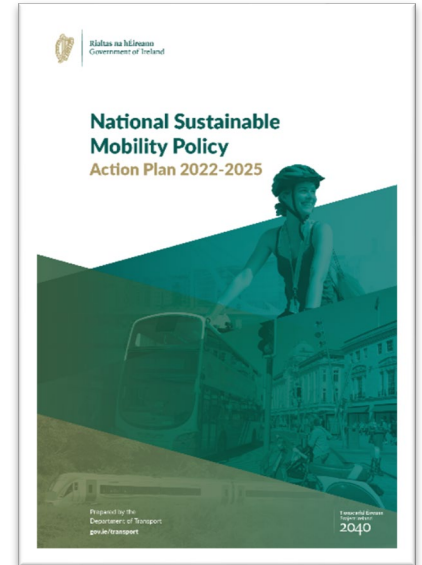


Table 8 below and overleaf details the principles and goals of the SMP along with the proposed development's consistency with same.

Principle / Goal	Statement of Consistency
<p>Principle 1: Safe and Green Mobility</p> <p>Goal 1: Improve mobility safety.</p> <p>Goal 2: Decarbonise public transport.</p> <p>Goal 3: Expand availability of sustainable mobility in metropolitan areas.</p> <p>Goal 4: Expand availability of sustainable mobility in regional and rural areas.</p> <p>Goal 5: Encourage people to choose sustainable mobility over the private car.</p>	<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>Central to the proposed layout is the provision of dedicated off road cycle infrastructure throughout the development. This infrastructure links the Oldcourt Road with the Bohernabreena Road. It provides, as much as possible, a direct route from the access point on the Oldcourt Road to the Bohernabreena Road. Cyclists are given priority at all Link Street road crossings.</p> <p>In addition, informal pedestrian / cycle routes/tracks are proposed throughout the development. 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 proposed development caters for the completion of the main east-west link street for the Ballycullen-Oldcourt LAP lands, connecting</p>



	<p>the existing Oldcourt (R113) and Bohernabreena Roads.</p> <p>The development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.</p> <p>The proposed development also provides for the appropriate provision of bicycle parking. Generally, bicycle parking for detached, semi-detached, and end of terrace houses will be easily accommodated within the curtilage of the property. Where necessary, dedicated bicycle stores are provided. Mid-terrace houses will be provided with secure bicycle storage units in their driveways. 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>Principle 2: People Focused Mobility</p> <p>Goal 6: Take a whole of journey approach to mobility, promoting inclusive access for all.</p>	<p>The subject site is located proximate to existing public transport (bus services) (c. 1-2km away), which will allow for ease of movement from the development to existing employment centres in the vicinity e.g. Tallaght. To the north-west, existing local retail facilities are available at Lidl (c. 600m from the eastern edge of the proposed scheme) and c.1.8km to the Woodstown Shopping Centre.</p> <p>In addition, the proposed development caters for the completion of the main east-west link street for the Ballycullen-Oldcourt LAP lands, connecting the existing Oldcourt (R113) and Bohernabreena (R114) roads. The development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in</p>



Goal 7: Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.

Goal 8: Promote sustainable mobility through research and citizen engagement.

this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

Vehicular connections are proposed to the existing Dodderbrook estate to the north, at Dodderbrook Place, while additional pedestrian and cyclist access only at Dodderbrook Avenue and to the north-west into St. Anne's GAA club are also provided for. The design and siting of public open space for the development has been a key consideration, with formal/informal routes for pedestrians / cyclists prioritised throughout the development and accesses/connections provided to adjoining developments.

The proposed development also provides for the appropriate provision of bicycle parking. Generally, bicycle parking for detached, semi-detached, and end of terrace houses will be easily accommodated within the curtilage of the property. Mid-terrace houses will be provided with secure bicycle storage units in their driveways. 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.

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. 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 is 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.

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. LRDOP001/24) 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. LRDOP001/24) 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 the final application for LRD permission.

Table 2: Consistency with the SMP.

Evaluation of Consistency with the SMP

Given all the foregoing as set out in Section 5.12 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

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

6.1. Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

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 "RSES") is the relevant regional strategy for the proposed development.

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."

The RSES 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.

The RSES 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 RSES 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.

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 RSES, the document reiterates the need to achieve sustainable compact growth through means such as urban regeneration and infill development to revitalise existing settlements.



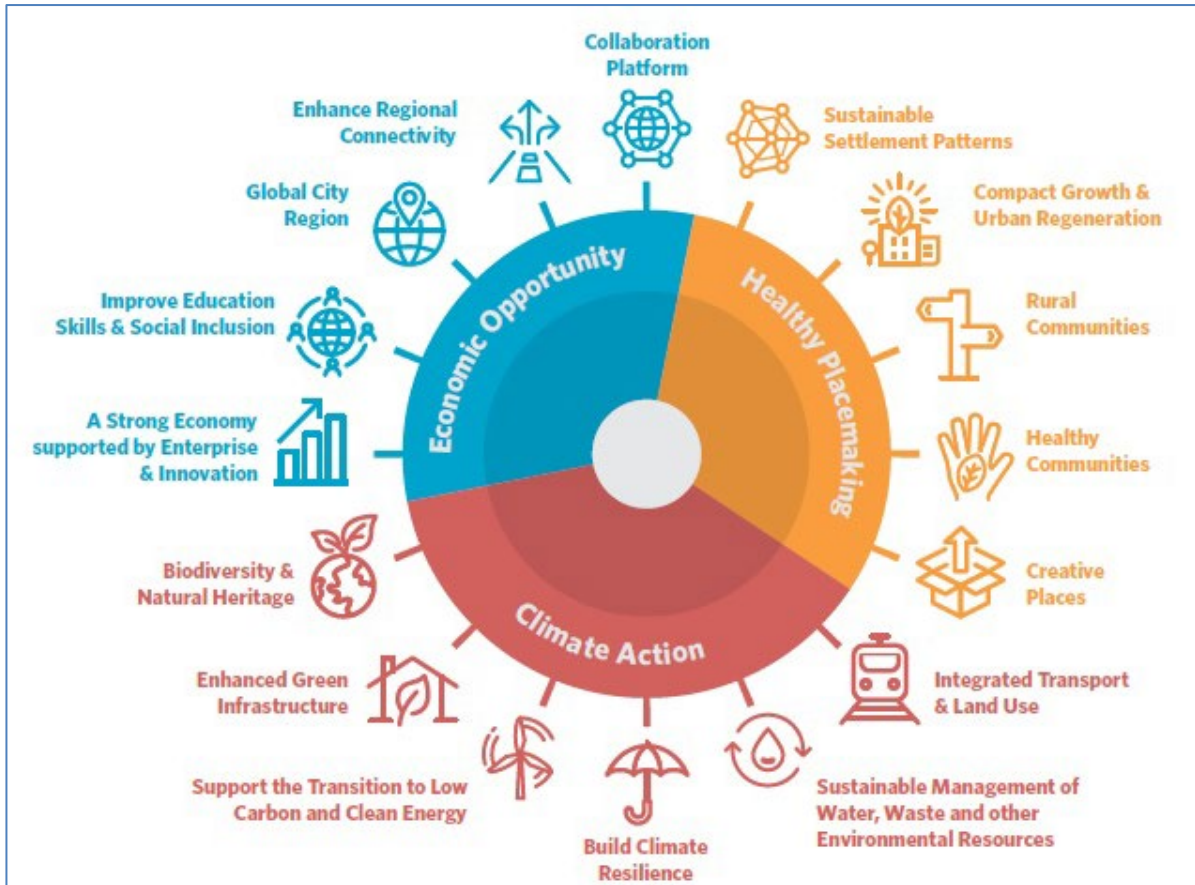


Figure 6: Regional Strategic Outcomes of the RSES.

Chapter 5 of the RSES 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.

Section 5.3 of the RSES 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.”*



Regional Policy Objectives of the RSES considered most relevant to the proposed development at Bohernabreena / Oldcourt 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 523 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 RSES by providing for a medium density residential development at an appropriate location, in compliance with the core strategy targets of the existing South Dublin CDP. 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

Whilst not a 'brownfield' or traditional 'infill' site, the proposed development provides for the consolidation and intensification of a site located adjacent to / between existing residential developments on lands zoned for residential land use. The future population of the development will support existing public transport infrastructure in the area, with the development also catering for infrastructure to support new bus routes. Pre-connection application enquires have been made to Irish Water to ensure existing water infrastructure can support 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

The proposed development caters for the completion of the main east-west link street for the Ballycullen-Oldcourt LAP lands, connecting the existing Oldcourt (R113) and Bohernabreena Roads. The development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

Central to the proposed layout is the provision of a dedicated pedestrian / cycle paths along the route of the main link street running through the development. 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

The proposed development caters for the completion of the main east – west link street for the Ballycullen-Oldcourt LAP lands, connecting the existing Oldcourt (R113) and Bohernabreena Roads. The development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.

Central to the proposed layout is the provision of a dedicated pedestrian / cycle paths along the route of the main link street running through the development. 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 for residential development in the existing South Dublin CDP, located in adjacent to the built-up urban environs of South Dublin. The proposed development is designed to integrate with existing surrounding residential development which has also been delivered by the applicant over the last decade. The proposed development is therefore considered to be compliant with the sequential approach to the 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 also provides for future public transportation facilities (bus stops) to cater for greater accessibility to existing local services.

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

Central to the proposed layout is the provision of a dedicated pedestrian / cycle paths along the route of the main link street running through the development. 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 pre-planning feedback received at the S.247 and Stage 2 "LRD" meetings for the proposed development, 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 the final application for LRD 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 the 2023 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. Central to the proposed layout is the provision of a dedicated pedestrian / cycle paths along the route of the main link street running through the development. In addition, informal pedestrian / cycle routes/tracks are proposed 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.

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.

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 Pinnacle 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 6: Consistency with the RSES.

Evaluation of Consistency with the RSES

In accordance with the Regional Policy Objectives of the RSES, the proposed development will deliver a medium density development of modern and adaptable new homes adjacent to existing built-up residential areas and in close proximity to existing public transport (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 for residential land use under the County Development Plan and will help to achieve the RSES'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.

6.2. 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 (NTA) 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.



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

The proposed development provides for a net density of c. 42 no. dwellings per hectare. The subject site is currently within a 1-2km walking distance of existing bus services to the north and east but the central link street, running east-west through the proposed development includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future. 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.



7.0 Consistency with Local Planning Policy

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

- The South Dublin County Development Plan, 2022-2028,
- The Ballycullen-Oldcourt Local Area Plan, 2014 (as extended).

7.1 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.

The subject site is also subject to the Ballycullen-Oldcourt Local Area Plan 2014, as extended until September 2024. Details of the proposed development's compliance with the Ballycullen-Oldcourt Local Area Plan 2014 is set out in section 7.2 of this Statement. We acknowledge that the LAP may have expired by the time a decision is due on this LRD planning application, however, the proposed development's compliance with same is set out under section 7.2 of this Statement.

Land Use Zoning

The majority 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 523 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.

A triangular portion of the site at the northwest (adjacent to St. Anne's GAA club) is zoned objective "RES": *"To protect and / or improve residential amenity"*. Under this land use zoning objective, residential development is permitted in principle, with childcare facility being a use that is open for consideration.

At the north of the site, a strip of land, currently zoned objective "OS": *"To preserve and provide for open space and recreational amenities"* is included for infrastructural purposes i.e. to accommodate a proposed 225mm Ø Foul Sewer pipe. It is put forward that given the proposed sewer pipe will be located underground, the provision of a use compatible with the open space zoning above same will be possible and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including *"all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers..."* are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on "OS" land will not affect the future utility of the "OS" lands and no, permanent, above ground impacts will occur directly as a result of this development.

Letters of consent from South Dublin County Council and Dublin City Council to the inclusion of the land required to accommodate the proposed sewer are enclosed with this LRD application.

To the south, a small portion of land (within Neighbourhood Zone 1 & immediately south of proposed house no.s 154 - 156) is zoned “RU”: “To protect and improve rural amenity and to provide for the development of agriculture”. This parcel of land is proposed as open space, with no other development proposed on same. Under the “RU” land use zoning objective, open space is a use that is permitted in principle under this zoning objective.

Please refer to the submitted Davey+Smith drawing no. MP13 “Overall Lands – Land Use Zoning Map” which overlays the proposed development and red line of application over the CDP Zoning Map no. 9.

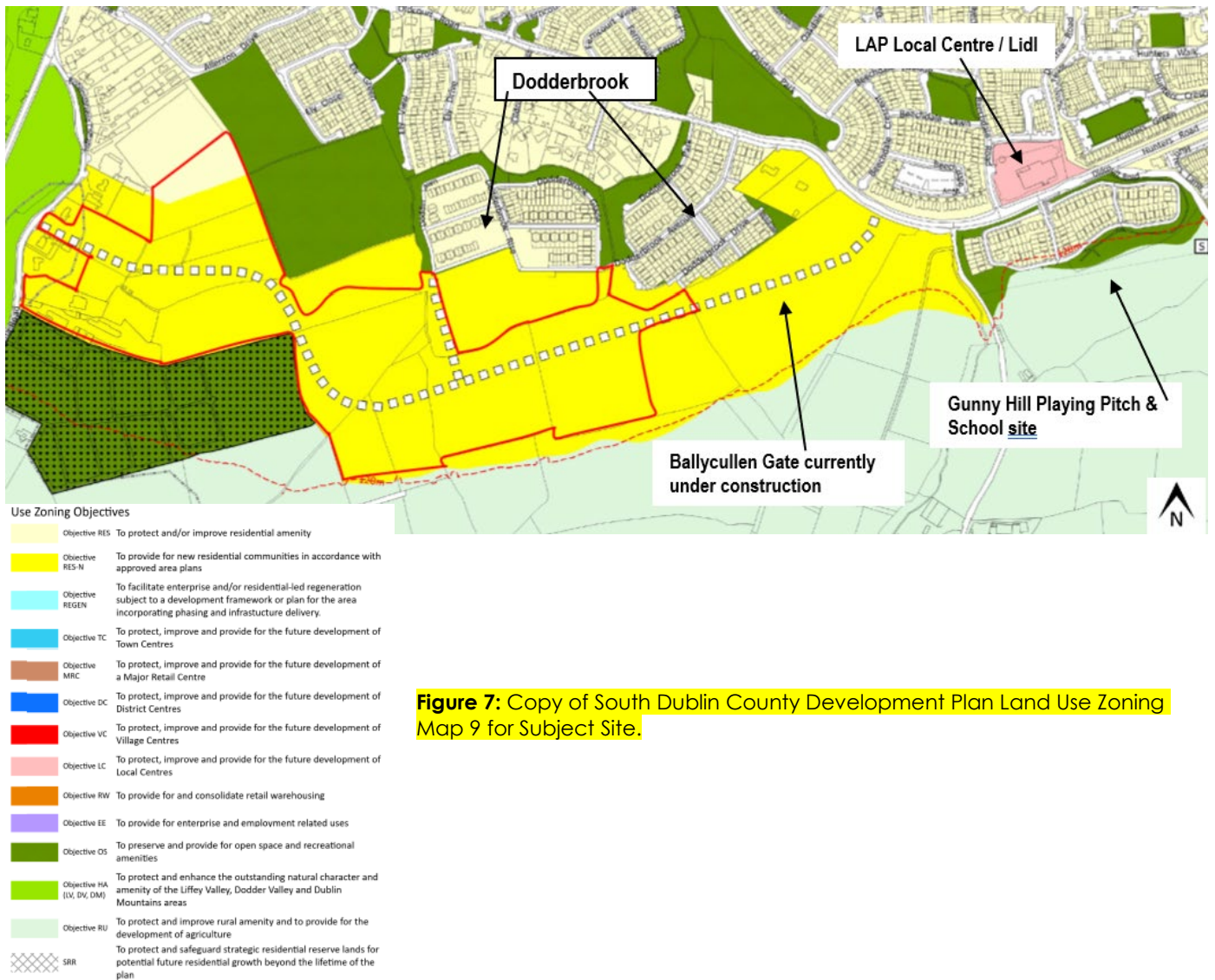


Figure 7: Copy of South Dublin County Development Plan Land Use Zoning Map 9 for Subject Site.

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 “Permitted in Principle” and “Open for Consideration” respectively under the “RES” land use zoning objective and, therefore, the proposed development is in compliance with the land-use zoning objectives for the site.

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”.

The Ballycullen area is identified as being part of “Dublin City and Suburbs” settlement typology in Table 14 of the existing CDP. “Dublin City and Suburbs” is defined as an: “International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.”

Figure 9 of the existing CDP identifies the Ballycullen-Oldcourt Local Area Plan lands are a “Housing Capacity Site” – extract of same show below with LAP lands circled in red.

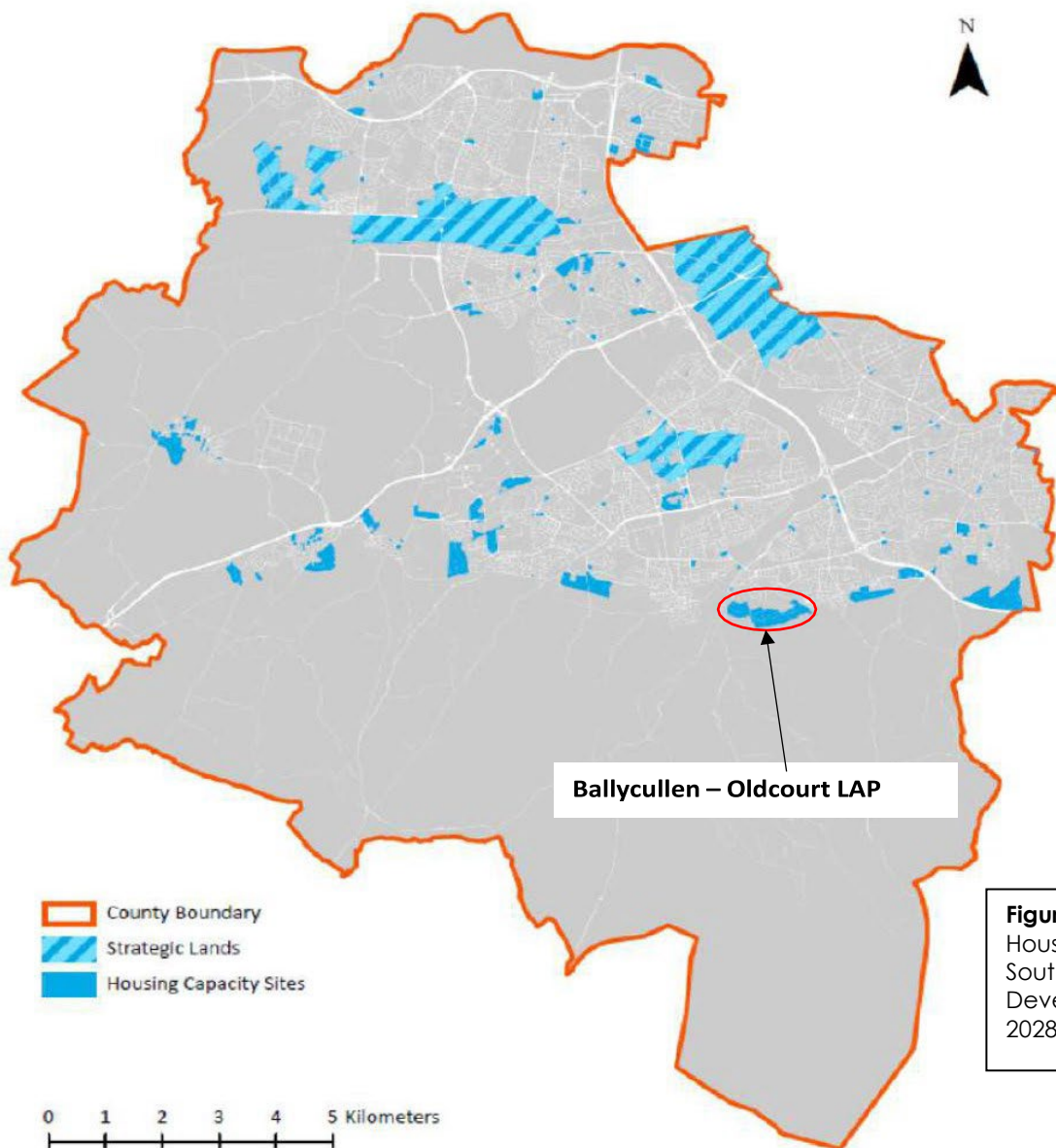


Figure 87: Extract of Figure 9: Housing Capacity Sites from South Dublin County Development Plan, 2022-2028.

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:

Table 3: Consistency with the South Dublin CDP Core Strategy and Settlement Strategy.

Policy/Objective	Provision	Proposed Development 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 Ballycullen – Oldcourt 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 plan led 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 land use 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. The proposed development is on lands that are subject to the approved Ballycullen – Oldcourt LAP, which contains a phasing strategy to which the proposed development complies. This LRD application also includes a Social Infrastructure Assessment (hereafter "SIA") – please refer to same for further details.
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 residential land use 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 1-2km walking distance of existing public transport (bus) services, with the current proposal catering for 2 no. future bus stops, thus making the site highly accessible for future bus services. The subject lands have been zoned for

<p>CS6 Objective 2</p>	<p><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 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).</i></p>	<p>many years for new residential development and form part of the overall LAP, with housing having been and currently under construction on other parts of the LAP lands, therefore the proposed development will consolidate the delivery of housing on the western part of the LAP lands.</p>
<p>CS6 Objective 5</p>	<p><i>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.</i></p>	<p>An overall net residential density of 42 units per hectare has been achieved in accordance with CS6 Objective 4. The scheme is also located within 1-2km of Dublin Bus Stops to the north and east which provide high-quality public transport options to Dublin City and surrounding South Dublin County.</p> <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 density, residential development located close to existing and planned 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>
<p>Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement</p>	<p><i>Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.</i></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 SIA.</p>
<p>CS7 Objective 1</p>	<p><i>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 amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.</i></p>	<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>A variety of community facilities are located within the local area which aim to provide a range of services for all ages to the area. Please refer to the submitted Social Infrastructure Assessment which finds that there are <i>inter alia</i> 7 no. community facilities, 20 no. sports and recreation facilities, and 11 no. retail facilities in the area</p>



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 polices/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 both the CDP and LAP, and applying a masterplan concept to the overall concept design in terms of the existing site features.</p> <p>The existing trees, drainage ditches, surrounding lands, archaeological and ecological aspects have all been considered. This process has been important in determining a landscape masterplan which is respectful of the key aspects of the of the landscape fabric which are incorporated into the layout of the proposed development.</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>	The retention of hedgerows, protection of views to the south and the overall landscape masterplan, which will see the delivery of the new "Oldcourt Park" all aid the protection, conservation and enhancement of natural, cultural and built heritage features. The site layout plan and landscape design combine to invite 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 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.
NCBH1 Objective 2	<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</i>	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

	<i>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>	by the quantum of hedgerow retention on the site and incorporation into the landscape design for the overall development.
Policy NCBH2: Biodiversity	<i>Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</i>	<p>A variety of native vegetation species are incorporated 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> <p>Preserving hedgerows in 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 the landscape's visual appeal, and ensure a sustainable and harmonious outdoor environment.</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>	This LRD planning application is accompanied by an Appropriate Assessment (AA) Screening Report, a Natura Impact Statement (NIS) 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.
NCBH2 Objective 2	<i>To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation</i>	Having regard to the pattern of permitted development in the immediate vicinity and the AA prepared for same, as well as the findings of the enclosed AA Screening and NIS for the subject proposal, it is considered at this juncture that the proposed development will not will adversely affect the integrity of European sites.
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>	This LRD planning application is accompanied by an AA Screening, NIS and an EIAR (Chapter No. 5 - Biodiversity) which

		have considered the impact of the proposed development on local watercourses e.g. Dodder River, Ballycullen Stream.
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>	This LRD planning application is accompanied by an AA Screening Report, NIS 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.
NCBH3 Objective 1	<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>	The submitted NIS states: "This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed LRD at Bohernabreena, Oldcourt, Ballycullen, Co. Dublin, on the following European Sites:
NCBH3 Objective 3	<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</i>	<ul style="list-style-type: none"> ▪ Glenasmole Valley SAC (001209) ▪ Wicklow Mountains SAC (002122) <p>The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction and operation, on the integrity and qualifying interests of the above European sites, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.</p> <p>Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the</p>

	<p><i>provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.</i></p>	<p><i>Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.</i></p> <p><i>As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extent of Glenasmole Valley SAC or Wicklow Mountains SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site”.</i></p> <p>Having regard to the pattern of permitted development in the immediate vicinity and the AA s prepared for same, as well as the findings of the enclosed NIS for the subject proposal, it is considered at this juncture that the proposed development will not will adversely affect the integrity of European sites.</p> <p>Please refer to the enclosed AA Screening Report and NIS for full details.</p>
<p>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas</p>	<p><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></p>	<p>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. Dodder River, Ballycullen Stream.</p>

<p>NCBH5 Objective 1</p>	<p><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></p>	<p>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.</p>
<p>NCBH5 Objective 2</p>	<p><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></p>	
<p>Policy NCBH6: Dublin Mountains</p>	<p><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></p>	<p>This LRD planning application is accompanied by an EIAR (Chapter No. 5 – Biodiversity, Chapter 6 – Land, Soil & Geology & Chapter 14 – Archaeological & 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 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, rural, and mountainous regions while facilitating linkages with other regional corridors, (ii) protect and enhance the area's heritage, geology, special amenity, and recreational value, (iii) improve ecological habitats facilitating movement for protected species and supporting various ecosystem services, (iv) preserve and enhance the outstanding landscape character and amenity of the area.

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>	The subject site has been assessed and surveyed over the past twelve months by the project ecologists – refer to Chapter 5 Biodiversity of the submitted EIAR for full details.
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>	A suitably qualified ECoW will be employed before commencement and for the duration of the Construction Phase; to provide ecological advice and input to the construction team. The ECoW will also prepare an Invasive Species Management Plan for the Site prior to commencement of works to remove and manage the existing Japanese knotweed and butterfly bush infestations at the Site.
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>	The trees and hedgerows on the subject site have been assessed by Arborist Associates, as detailed in their arboricultural assessment, tree protection plan and tree constraints plan enclosed with this LRD planning application, which details the significant quantum of trees / hedgerows that are being retained on site as part of the development proposal. The submitted landscape design by Gannon & Associates demonstrates how the retained planting on site is being incorporated into the overall landscape design proposal for the development.
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 the retention of 2,8870.9sq.m of hedgerows. The integration and preservation of hedgerows are integral to the soundscape 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.

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 14 of same "Archaeology & Cultural Heritage" assesses the impacts of the proposed development on archaeology and cultural heritage of the site, with geophysical surveys having been carried out. 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>	This LRD planning application includes an EIAR, and Chapter 15 of same "The Landscape" describes the landscape and visual context of the proposed development and outlines the landscape and visual effects of the development proposal.
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>	The LVIA asserts that "in arriving at the design for the proposed development, consideration has been given to the sloping nature of the site, the existing green infrastructure, and existing wayleaves, with the housing typology responding to elevation. The development is therefore considered to respond sensitively to the site's topography and location at the foothills of the Dublin Mountains, to the characteristics and qualities that underpin this landscape, and to visual receptors for which the proposed development would generate change in their visual environment".
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>	
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 notes that "wider urban edge has accommodated numerous housing projects, that have gradually expanded the wider townscape in line with the strategic direction for this part of the administrative area. The proposed development of this site is not considered to have the potential to generate any operational landscape or visual effects greater than Moderate, and no effects are considered to have the potential to be significant".
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 LVIA states that <i>“the most notable landscape and visual effects relate to a relatively geographically restricted area, with effects reducing significantly with distance and elevation, as the proposed development becomes a proportionately smaller component of the urban edge. The proposed development, together with any infill schemes that arise as a result of the realignment of the ESB Power cable, is considered to have the potential to form a positive addition to the urban edge in this direction”</i>.</p> <p>Please refer to Chapter 15 of the EIAR and submitted verified views / photomontages for more details.</p>
<p>NCBH17 Objective 3</p>	<p><i>To continue to promote use of the Irish language in the naming of new residential developments.</i></p>	<p>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.</p>

Table 7: Consistency with the South Dublin CDP Chapter 3.

Green Infrastructure

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>	<p>The proposed open spaces will contribute to the green infrastructure network in the area. The proposed open spaces have been located to connect with the ecological corridors abutting the site boundaries.</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 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	<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</i>	<p>The proposed development occupies a large site, c.20Ha, with over 7Ha dedicated to open spaces of varying size, form and function. One such element is the provision of a bio-retention park in the western part of the site, which acts as a sustainable stormwater management system, helping to mitigate the effects of water runoff. layout. It serves a crucial ecological role</p>

	<p><i>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>by acting as a sustainable stormwater management system, mitigating water runoff effects. Through its strategically designed depressions and vegetation, the park effectively absorbs, filters, and cleanses stormwater, removing pollutants and preventing them from contaminating local water bodies. This function not only protects the environment but also improves the quality of nearby water resources. The bio-retention park also contributes to the overall wellbeing of the community. Its winding pathways and lush greenery provide a tranquil space for recreation, relaxation, and connection with nature. The running track, intersecting the park's organic lines, encourages physical activity, promoting a healthy lifestyle for residents and visitors alike.</p> <p>There are linear parks, seamlessly connected through a shared surface to the main park, uphold the core concept of sinuous lines and ecological harmony. In keeping with the main park's design, the existing hedgerows have been carefully preserved, and thoughtfully designed activity zones, natural play spaces, and comfortable seating and resting areas have been integrated.</p> <p>Paths and connections were 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 (sections 5.3 & 6.4.1).</p>
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		As outlined above, this LRD application is accompanied by an Appropriate Assessment Screening Report and Natura impact Statement.
GI1 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 (section 6), 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>	Hedgerows will be retained to the greatest extent possible, with removal considered only when necessary for the implementation of larger connecting structures, such as distributor roads. The Green infrastructure strategy applied to the proposed development include: <ul style="list-style-type: none"> ▪ Use of Native Vegetation: A variety of native vegetation species were incorporated 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.
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>	<ul style="list-style-type: none"> ▪ Selective Hedgerow & Tree Removal: A tree removal strategy was implemented based on a detailed assessment, as indicated by a tree survey. The focus was on eliminating lower-quality trees, prioritizing the health of the ecosystem and adhering to the standards identified in the survey.
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</i>	<ul style="list-style-type: none"> ▪ Connectivity: Paths and connections were 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

	<p><i>watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan</i></p>	<p>promoted accessibility and harmonious integration with the surroundings.</p> <ul style="list-style-type: none"> ▪ Preservation of Landscape Views: Landscape design strategies were developed to respect and preserve panoramic views of the surrounding landscape, ensuring that the visual and natural integrity of the surroundings was maintained and valued.
<p>G12 Objective 4</p>	<p><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></p>	<ul style="list-style-type: none"> ▪ Plants for Pollinators: Carefully selected plants were chosen to encourage pollination, thus supporting the life and diversity of pollinating insects. This conscious choice contributed to the health of the local ecosystem and enhanced the natural beauty of the space. ▪ Preserving Hedgerows: 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's visual appeal, and ensure a sustainable and harmonious outdoor environment.
<p>G12 Objective 5</p>	<p><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>	<p>The subject site straddles the townlands of Bohernabreena and Oldcourt, with part of the proposed development also traversing the townland of Killinenny. The proposed development seeks to preserve existing biodiversity and hedgerows. 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. Section 5.2 of the enclosed landscape design rationale identifies the hedgerows to be retained including the north-south hedgerow that is the boundary between the two townlands of Bohernabreena and Oldcourt.</p>

<p>Policy G13: Sustainable Water Management</p>	<p><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 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>	<p>Pinnacle Consulting Engineers have provided reports and information regarding water management on site. The proximity of the site to streams, 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>
<p>G13 Objective 1</p>	<p><i>To ensure that hydromorphical 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></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>
<p>G13 Objective 2</p>	<p><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></p>	<p>A Hydrological & Hydrogeological Qualitative Risk Assessment, prepared by AWN Consulting has also been prepared and is enclosed a separate standalone report as part of this LRD application. It concludes: <i>“During the construction phase there is no direct source pathway linkage between the proposed development site and Dublin Bay coastal waterbody and the</i></p>

		<p><i>Natura sites located herein</i>" It also concludes that "there are no pollutant linkages as a result of the construction or operation of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites located within Dublin Bay or the other receptors included in this assessment".</p> <p>It also states that "in line with good practice, appropriate and effective mitigation measures will be included in the construction design, management of construction programme and during the operational phase of the proposed development. With regard the construction phase, adequate mitigation measures will be incorporated in the Construction Environmental Management Plan (CEMP). These specific measures will provide further protection to the receiving soil and water environments".</p> <p>There are several existing farm ditches across the site, conveying surface water runoff from south to north across the subject site.</p> <p>There are several existing farm ditches across the site, conveying surface water runoff from south to north across the subject site. In order to maintain the functioning of the existing agricultural ditches, several road-crossing culverts shall be designed in line with the Office of Public Works (OPW) requirements and the Arterial Drainage Act 1945. During detailed design, the necessary Section 50 application shall be made for each of the proposed culverts.</p> <p>The subject site, in its current condition, drains northwards via existing ditches which ultimately discharge into the nearby Dodder River. The attenuated post-development surface water runoff shall discharge into the existing ditches at a restricted</p>
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		rate equal to the Greenfields runoff rate. Where the subject site shall have multiple surface water outlets in the existing ditches, each sub-catchment shall discharge surface water at a restricted rate, proportional to the area of the contributing sub-catchment.
G13 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 is maintained / reinstated along all watercourses within any development site</i>	Where required, the necessary 10m buffer is provided.
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>	Pinnacle 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. Please refer to the submitted engineering & landscaping drawings and reports for details.
G14 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 Pinnacle Consulting Engineers. All of the SuDs proposals are multifunctional and incorporate the provision of open spaces and biodiversity.
G14 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.
G14 Objective 3	<i>To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.</i>	

G14 Objective 4	<i>To require that all SuDS measures are completed to a taking in charge standard.</i>	The proposed development includes proposals that are designed to mitigate against climate change through landscaped areas and SuDS.
G14 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>	<p>The surface water from the proposed development will be captured by various nature-based sustainable urban drainage systems (SuDS) interventions over the use of a conventional gully and piped surface water network, as guided by the SDCC Sustainable Drainage Explanatory Design & Evaluation Guide 2022.</p> <p>Due to the steep nature of the site, a piped surface water conveyance system has been added to the design as a redundancy and shall only be engaged by the overtopping or bypassing upstream SuDS features. The piped conveyance network will seek to capture any surface water that has potentially bypassed or exceeded the SuDS features capacity and discharge the surface water at a safe strategic outlet location, reducing the risk of overland flooding.</p> <p>The proposed SuDS interventions have been implemented to ensure runoff is treated to the standards outlined in the Greater Dublin Strategic Drainage Study and to add bio-diversity value, improving the aesthetic design of the development. All the proposed SuDS measures are subject to the findings from a ground investigation, including infiltration and observations of any potential water tables.</p>
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>	Pinnacle 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. Please refer to the submitted engineering & landscaping drawings and reports for details.

Policy G15: 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>	<p>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.</p> <p>Section 6.4 of the submitted Landscape Design Rationale provides details of SUDS stagy applied to the proposed development – please refer to same.</p>
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) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).</i>	<p>Section 7.3 of the submitted Landscape Design Rationale provides details of Green Space Factor that is achieved by the proposed development – i.e. 0.5.</p>
G15 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>	<p>Green / blue roofs are incorporated into the proposed design and details of same are provided in the submitted Engineering Planning Report – please refer to same.</p>

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>	<p>The proposed development includes the creation a new public park "Oldcourt Park" which includes a fitness area, as well as a series of running tracks through the development and its open spaces i.e. through the bio-retention park (as detailed in section 4 of the submitted landscape design rationale). The proposal enhances the existing natural features on site, creating an attractive environment for humans throughout.</p>
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>	<p>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 – sections 4 & 6.2.2.</p>
GI6 Objective 3	<i>To provide accessible, attractive and safe routes linking settlements to the GI network of the County.</i>	<p>A variety of green links are proposed throughout the development that will connect to adjoining lands on all sides (refer to section 6.3.1 of the submitted landscape design rationale). 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.</p>
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>	<p>Over 7Ha of 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.</p>
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>	<p>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.</p>

G16 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.
G17 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>	
G17 Objective 2	<i>To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the 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>	The proposed development makes best use of land on this highly accessible site while also providing c.36% of the site as public open space including a new public park 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.

Table 5: 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, as well as the delivery of the east-west link street that also incorporates dedicated pedestrian and cycle paths. The new link street also accommodates the future provision of 2 no. bus stops, all of which will provide more direct access to local services and public transport.
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 guidelines, as assessed above and in the submitted DMURS Statement of Compliance 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 will comprise a fully integrated mix of private and Part V dwellings, supported by residential amenities including new public parks and 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 the submitted Planning Statement (section 4.1.5) and the Architectural Design Statement – please refer to same.
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>	This LRD planning application is accompanied by an Architectural Design Statement prepared by Davey+Smith Architects which outlines the urban design principles applied to the scheme, as well as details on the four “Neighbourhood Zones” proposed within the overall development, and details of materiality and finishes – please refer to same. Details of how the 8 Design Principles underlining “The Plan Approach” policy of the Development Plan are provided for are set out in section 4.1.5 of the submitted Planning Statement – 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>	– please refer to same.
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, in accordance with the land use zoning objectives attached to the site, as well as being in keeping with the prevailing character of development in the immediate environs. There are four distinct “Neighbourhood Zones” proposed with the overall proposal along with proposed enhancements to public amenities

		through the provision of a significant new public park "Oldcourt Park" as well as a variety of public open spaces 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.
QDP3 Objective 7	<i>Any development on the RES-N lands (Killinarden and Ballycullen / Oldcourt) abutting the Rural Zone at Map 9 shall be designed, located, scaled and serviced in a manner that does not detract from the character and landscape of the receiving environment bearing in mind its proximity to the HA-DM zone</i>	The proposed development is within zoning Map 9 of the SDCC Development Plan. The majority of the application site is zoned RES-N. As part of this LRD application, a Landscape Visual Impact Assessment is submitted, prepared by Macroworks. No development occurs above the 120m contour line on the subject site. The low-level nature of the proposed buildings (max 3-4 storeys) as well as the site layout plan and landscape design ensures that the proposed development will blend in seamlessly with the surrounding character and landscape of the site and surrounding areas. Please refer to the submitted LVIA (Chapter 15 of the enclosed EIAR) and associates photomontages.
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 14 "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/zones 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</i>	The site is unique given its topography and site constraints offers the opportunity to provide a residential development with a distinctive sense of place, that will successfully assimilate into its

	<i>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>	receiving environs – this is reaffirmed by the creation of four distinct “Neighbourhood Zones” within the development.
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 ensuring 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>	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 public transport to services in surrounding larger settlements. 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.
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 the submitted Traffic & Transport Assessment which outlines all of the listed – please refer to same.
QDP5 Objective 2	<i>To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced</i>	The proposed design maximises accessibility and permeability for pedestrians and cyclists, with the provision of multiple access

	<i>permeability links within all areas and pedestrianisation within identified centres</i>	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>	All of the objectives including 2, 3, 4, 5, 8, and 9 have been considered in this assessment. The ones below are the most relevant ones to this 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>	All apartments / duplex units have private balconies/terraces of sufficient size, as detailed in the submitted HQA.
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>	Suitable boundary treatments will be provided to the parkland/amenity spaces throughout the scheme. Please refer to the submitted boundary treatments prepared by Gannon & Associates Landscape Architects.
		The proposed development caters for pedestrian and cyclist links throughout the scheme, including dedicated paths along

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 main east-west link street. Future bus stops along this street are also accommodated within the roads design. On the proposed east-west main link street, the future provision of 2 no. new bus stops is identified, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.
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 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>	Please refer to section 4.1.5 of the submitted Planning Statement which demonstrates the proposed development's compliance with "The Plan Approach".
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 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</i>	Section 5 of this Statement demonstrates the proposed development's compliance with each of these documents – please refer to same.

	<i>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>	
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 DMURS Statement of Compliance – 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 low-level heights of the proposed buildings take into account the locational context of the subject site on the edge of the built up area, its topography and views to the mountains to the south. 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 CS Consulting</p> <p>As the buildings are predominantly 2 and 3 storeys with 1 no. building (Block C) being 3-4 storeys, 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</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 familiar with and has informed detailed design decisions.

	<i>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>	
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, are adaptable, refer especially to house type C. 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 5.3.13 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> <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.
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>	<p>A variety of apartments and duplexes are proposed with a broad range of unit sizes. Section 7.7 of the submitted Planning Statement provides details of the proposed housing mix, with a separate HQA also enclosed as standalone document.</p> <p>Significant public open space is provided across the entire scheme incorporating SUDS, promoting biodiversity, and providing residential amenity.</p>

<p>QDP7 Objective 12</p>	<p><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></p>	<p>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.</p>
<p>Policy QDP8: High Quality Design – Building Height and Density Guide (BHDG)</p>	<p><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></p>	<p>This is noted. The majority of the proposed buildings are 2 and 3 storeys with 1 no. building (Block C) being 3-4 storeys. This has been carefully considered in terms of the locational context of the site on the edge of the built up area of South Dublin and in line with the topography of the site. 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 5.1 of this Statement.</p>
<p>QDP8 Objective 1</p>	<p><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 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>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. 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 5.3 of this Statement sets out the proposed development's compliance with the Sustainable Residential Development and Compact Settlements Guidelines (2024) with</p>

		the proposed development achieving a net density of 42 units per hectare.
QDP8 Objective 2	<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>	The max height of the proposed development is 3-4 storeys i.e. Block C is the tallest building within the overall development, with all other buildings being 2 or 3 storeys. The proposed development is on a site of sufficient size and distance from neighbouring developments that it can establish its own character, whilst also respecting its locational context and elevated position. The main link street is directly addressed by the taller elements of the development to create a strong urban street frontage, while the positioning of the main areas of public open space enables a parkland setting to be created adjacent to the main link street, which is considered to provide an appropriate street-scene to this main east-west access route. All of the foregoing combines to enhance the legibility of the area in accordance with best practice guidelines.
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 taking into account views southwards to the mountains. Based upon the forgoing, maximum heights of 3 storeys (with 1 no. building (Block C) being 3-4 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>	Photomontages accompany this LRD planning application, as well as a Landscape Visual Impact Assessment – refer to Chapter 15 of the enclosed EIAR.
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 2-, 3- and 4-bedroom houses, thus providing a variety of sizes and

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>	shapes for future homes. 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>	Please refer to the submitted Architectural Design Statement for details on the design of the proposed dwellings and creation of the four no. distinct neighbourhood zones within the overall development. Details of the proposed materiality are also set out in the submitted Architectural Design Statement.
QDP11 Objective 1	<i>To require the use of high quality and durable materials and finishes that make a positive contribution to placemaking.</i>	
QDP11 Objective 2	<i>To promote the use of structural materials that have low to zero embodied energy and CO2 emissions and ensure a wood-first policy on public buildings funded or part-funded by the Council.</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 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.
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 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. Chapter 13 – "Material Assets: Resource & Waste Management" of the enclosed EIAR contains a Resource & Waste

		Management Plan and an Operational Waster management Plan – please refer to same for details.
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 proposed development site is subject to the Ballycullen – Oldcourt Local Area Plan, 2014 (as extended), and full compliance with the requirements/policies/objectives of same are set out further on in this Statement. It is noted however that this LAP is due to expire in September 2024 and therefore by the time a decision is due on this LRD application the LAP may have expired. However, we note that the CDP has zoned the subject site for residential land use, has identified the subject site as a “Housing Capacity Site” and contains various policies and objectives pertaining to Ballycullen – Oldcourt lands.
QDP14 SLO 3	<i>That the provisions of the Ballycullen - Oldcourt Local Area Plan (2014) as extended, in respect of the steep topography in the lands zoned RES-N between Stocking Lane, Ballycullen Road and the M50 (Map 10) remain in force during the lifetime of this Plan having regard to ministerial guidelines.</i>	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 6: 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 polices/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.

<p>H1 Objective 1</p>	<p><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>	<p>The CDP identifies that almost 15,500 new homes are required by the end of 2028, therefore the current proposal of 523 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 includes a mixture of 10% - 20% Social & Affordable housing units. Therefore, 95 no. units will be made available as Social & Affordable Housing units.</p> <p>The proposed development aligns with the residential zoning objectives attached to these lands and represents a sustainable and efficient use of zoned land at this strategic location.</p>
<p>H1 Objective 2</p>	<p><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 Housing Act 2021 and the Planning and Development Act 2000 (as amended).</i></p>	<p>The CDP identifies that almost 15,500 new homes are required by the end of 2028, therefore the current proposal of 523 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 includes a mixture of 10% - 20% Social & Affordable Housing units. Therefore, 95 no. units will be made available as social & affordable housing units.</p> <p>The proposed development aligns with the residential land use zoning objectives attached to these lands and represents a sustainable and efficient use of zoned land at this strategic location.</p>
<p>H1 Objective 3</p>	<p><i>To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes</i></p>	

	<i>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-bedroom houses.
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. A Part V proposal is enclosed with this LRD planning application.
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 applicant encloses Part V proposals 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 523 no. units at an appropriate density of c.42 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>	c.52% (i.e. 270 no.) of the units proposed within this development are attributed to 3-bedroom dwellings / 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</i>	The proposed LRD is on zoned land zoned for residential land use and is in line with the land use zoning objectives set out in the CDP.

	<p><i>development of housing lands based on the Settlement Strategy outlined in Chapter 2: Core Strategy and Settlement Strategy.</i></p>	<p>The proposed development is a medium-density, residential development located in close proximity to existing and planned bus transport services. It will provide an alternative to unsustainable patterns of car-dependent residential development.</p> <p>The development will provide 523 no. units that will help in meeting growth targets for the Tallaght area as set out in Table 11: Core Strategy.</p>
<p>H2 Objective 4</p>	<p><i>To promote lifetime housing standards in new homes built in the County in accordance with best practice.</i></p>	<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 requirements typically equate to an A3 BER rating for commercial buildings and A2 for residential with a percentage of energy needs to be derived from on site or nearby renewables.</p> <p>The design and layout of the proposed development will meet the requirements of all relevant documents, in particular Part M of the Building Regulations Technical Guidance Documents which deal with accessibility and inclusivity. In this regard, the design of the proposed development is also guided by the principles of universal design. A Universal Design Statement is also submitted as part of this LRD application.</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>	The proposed development provided 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.
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 section 5 of 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</i>	All of the apartment types are designed as suitable for older people.

		<i>for Our Ageing Population 2019 and having regard to Age Friendly Ireland's guidelines for Planning Authorities (2021).</i>	
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 development has been designed in compliance with the provisions of the Sustainable Residential Development and Compact Settlements Guidelines, 2024, as detailed in section 5.3 of this Statement and the submitted Architectural 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 as may be updated and Chapter 12: Implementation and Monitoring.</i>	The proposal has been designed in compliance with the provisions of the Sustainable Residential Development and Compact Settlements, Guidelines, 2024, Design Standards for New Apartments, Guidelines for Planning Authorities (2023), and the Design Manual for Urban Roads and Streets as outlined in Section 5 of this Statement.
H7 Objective 2		<i>To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.</i>	The proposed development has been designed in accordance with Part L of the Building Regulations. 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.

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 DMURS Statement of Compliance 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 DMURS Statement of Compliance 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 and enhances the visual character, identity and amenity of the area.</i>	<p>The proposed open spaces will contribute to the green infrastructure network in the area. The proposal also includes the delivery of “Oldcourt Park” in its entirety which is a major neighbourhood park serving the LAP lands.</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 are clearly defined by hard and soft landscaping. All of these open spaces will be overlooked by dwellings, providing passive surveillance, and creating a sense of safety.</p> <p>In addition, sufficient 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. The proposal also includes the delivery of “Oldcourt Park” in its entirety which is a major neighbourhood park serving the LAP lands.</p> <p>C. 7.3Ha of public open space is provided for across the entire site which equates to c.36% of the overall application 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 dwellings, 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 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 development includes a new park “Oldcourt Park” as well as a series of residential pocket parks distributed throughout the development. A clear distinction of open space is provided for. Refer to the submitted Gannon & Associates drawing no. 23130_OLDCURT_LP_E-POS-Public Open Space OSP for details of the overall open space type and provision.</p>
H8 Objective 3	<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>	N/A

Policy H9: Private and Semi-Private Open Space	<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>	All of the proposed dwellings have private open spaces. Houses have private rear gardens, while apartments and duplexes all have private balconies/terraces. Areas of each individual private open space are set out in the enclosed HQA.
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 – as confirmed in the enclosed HQA. The design, location and orientation of the rear 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 H10: Internal Residential Accommodation	<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 the 2023 Apartment Guidelines and all relevant guidance. Regard has also been had to the standards for compact housing as set out in the recently published 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 proposed development 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 all be adapted to accommodate an at home office.
Policy Privacy and Security	H11: and <i>Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</i>	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. 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.
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</i>	This is achieved within the proposed development. Please refer to the enclosed architectural and landscape drawings and reports for further details.

	<i>provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</i>	
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>	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, prepared by both the architects and landscape architects. 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 Design Statement prepared by Davey+Smith Architects and the Landscape Design Rationale prepared by Gannon & Associates – please refer to both.
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>	The proposed design and layout have been fully informed by the topography of the site. The site slopes upwards, to the south. Because of this, lower level and split level housing is proposed, with the taller elements (max 3 storeys & Block C: 3-4 storeys) positioned in the northern part of the site, and along the east-west link street creating a strong urban street frontage in accordance with urban design principles. The proposed housing in the southern part of the site is set into the slope of the site creating a step in section. The design of the scheme is further elaborated in the Architectural Design Statement prepared by Davey+Smith Architects – please refer to same.
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>	

Table 7: 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 and 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 providing a new east-west link street that can accommodate future bus stops, as well as 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 proposed development and adjoining lands. These will provide more direct access to local services and public transport. Furthermore, the proposed east-west link street includes for the future provision of 2 no. new bus stops along this main link street, supporting a transition to more sustainable transport means with the street being of a size capable of supporting bus services in a safe manner. Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.
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 Walking and Cycling	SM2: and <i>Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift 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, catering for a largely car free environment.
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 proposed 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>	The routes are also overlooked by adjoining residential developments and a safe environment will be created. 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.
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.
	<i>To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles,</i>	

SM2 Objective 6	<i>approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</i>	The proposed development adheres to standards set out in the National Cycle Manual – refer also to the submitted DMURS 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 and running tracks through the open spaces and paths that may connect southwards to the mountains in the future, 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 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>	Bike parking has been incorporating throughout the proposed scheme, in accordance with the necessary 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</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.

	<i>delivering major improvements to the public transport network.</i>	A car parking ratio of c.1.29 is achieved for the scheme overall, with a total of 673 no. long term spaces proposed to serve the 523 no. dwellings. Justification for the proposed parking standard is outlined in the submitted Traffic & Transport Assessment (Section 3) 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 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 the new east-west link street, as well as numerous 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 submitted design illustrates that the proposed east-west link street accommodates the future provision of 2 no. bus stops to serve the western part of the LAP lands, which may, in the future, increase the availability of public transport services, based upon feedback received from the NTA.
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</i>	

	<i>species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</i>	The proposed development, including the new east-west link street incorporates appropriate SUDS measures, with no underground attention proposed.
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 east-west link street can accommodate 2 no. future bus stops to serve the western part of the LAP lands, which may, in the future, increase the availability of public transport services.
SM3 Objective 15	<i>To support the enhancement of the Local Link Rural Transport Programme in consultation with stakeholders in order to provide the rural communities of the County, such as Bohernabreena and Glenasmole, with access to improved bus services</i>	Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future
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>	
Policy Strategic Network SM4: Road Network	<i>Improve and, where necessary, expand the County-wide strategic road network to support economic development and provide access to new communities and new development areas.</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.
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>	The proposed development provides for the east-west link street as identified in the CDP to serve these lands, as identified on the Development Plan's land use zoning map (Map no. 9).

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/drawings 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/drawings 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>	The proposed development provides for the east-west link street as identified in Table 7.5 "Six Year Road Programme" of the Development Plan, and on the Development Plan land use zoning map (Map no. 9).
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 12 – 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</i>	The submitted Traffic & Transport Assessment, DMURS Statement of Compliance and Architectural Design Statement confirm that the design presented for the proposed development has maximised

	<i>creation of a self-regulating street environment that promotes active travel modes and public transport.</i>	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 SM6: Traffic and Transport Management	<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.
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 South Dublin County Council Development Plan (2022-2028) as well as the recommendations of Sustainable Urban Housing: Design Standards for New Apartments (2023). In summary, a total of 746 no. car parking spaces are proposed on-site within the 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	<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> <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> 	Please refer to the Site Layout Plan by Davey + Smith 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.

	<ul style="list-style-type: none"> ▪ Provision of not more than two parallel or five perpendicular spaces between trees / planting bays; ▪ Use of permeable paving, where appropriate. 	
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>	<p>Parking is provided at surface level in a mixture of on-curtilage spaces and on-street / grouped parking arrangements. Throughout, the surface parking design is cognisant of the needs of pedestrians and cyclists.</p> <p>The incorporation of a slow speed residential roads/streets is provided to ensure that pedestrians and cyclists will be able to travel safely.</p>

Table 8: 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>	This development aims to provides a mix of housing both in terms of dwelling size, typology and tenures. The 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 parks, tracks for walking and running, fitness and play areas, 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 Social Community Infrastructure / COS2:	<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 9.14 of the RSES. (See also Chapter 5: Quality Design and Healthy Placemaking)</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).
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>	As agreed with South Dublin County Council, the applicant will pay a development / financial contribution in lieu, which is intended to be used for the upgrade/extension of existing community facilities in the local area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.14.2 of the submitted Planning Statement for details.
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>	The proposed development includes a c.457sq.m creche which will be appropriately sized to facilitate the predicted childcare demand of the proposed development. As agreed with South Dublin County Council, the applicant will pay a development / financial contribution in lieu, which is intended to be used for the upgrade/extension of existing community facilities in the local area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.14.2 of the submitted Planning Statement for details.

		The proposed development includes new public open spaces as well as a series of communal pockets of open space distributed throughout the development. A well-defined hierarchy of open space is provided for.
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 523 no. residential units will provide an increased local demand on existing community facilities. As a result, the upgrade/extension of existing facilities, provision of a childcare facility and creation of new public open spaces will facilitate and serve the population of this development and the wider area.
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 applicant will pay a development / financial contribution in lieu, which is intended to be used for the upgrade/extension of existing community facilities in the local area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.14.2 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>	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	<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> <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</i> 	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. Refer to the following submitted reports as part of this LRD planning application: Building Life Cycle Report, Sustainability Statement,

	<p>public transport via permeability and mobility management measures;</p> <ul style="list-style-type: none"> ▪ Co-location, clustering and sharing of community facilities to increase efficient use and reduce trips; ▪ 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>Architectural Design Statement & Landscape Design Rationale for further details.</p> <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 and visitors to the scheme. The continuity of path networks will assist natural way-finding in the scheme – refer to section 6.3.1 of the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects.</p> <p>The new public parks will support additional tree planting and encourage more wild areas.</p>
Policy COS3: Community Centres	<p>Ensure that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities</p>	<p>There are a number of community centres already in the wider area, however, as agreed with South Dublin County Council, the applicant will pay a development / financial contribution in lieu, which is intended to be used for the upgrade/extension of existing community facilities in the local area, as opposed to providing a dedicated community facility as part of the proposed development. Refer to section 7.14.2 of the submitted Planning Statement for details.</p>
COS3 Objective 1	<p>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.</p>	<p>The nearest existing sporting facilities to the proposed development are St Anne's GAA Club to the north/north-west of the site, while to the east a new playing pitch between Gunny Hill and Oldcourt Lane (and to the immediate south of Ballycullen Green) has been delivered by the applicant already. To the west is the Bohernabreena Pith and Putt facility. There are also several gyms, basketball, golf clubs and other facilities within the wider</p>
COS3 Objective 2	<p>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-</p>	

	<i>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 updated by any future community centre strategy carried out by the Council.</i>	area, as detailed in section 4.7 of the submitted SIA – please refer to same.
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 layout and design of the proposed development encourages a modal shift from car-based travel to sustainable transport modes which in return promotes a healthy lifestyle.
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 have 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. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects (sections 5.4, 6.2.2 & 7.5).</p> <p>The play areas are located in areas overlooked and passively supervised by the adjacent residential development and the footpath network.</p>
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>	<p>Play for younger children and teens is designed into the scheme as detailed in the submitted Landscape Design Rationale by Gannon & Associates (sections 5.4, & 7.5). – please refer to same.</p>
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 is promoted throughout the site with appropriate rest stops.</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>	<p>The public park, “Oldcourt Park”, is considered a key part of the overall scheme, is located in the north-east of the site and will create a significant new neighbourhood park for the wider community on these lands that were previously private and not open to the public. The proposed “Oldcourt Park” will increase the residential amenity for the existing local population.</p> <p>Other features of open space include running and walking tracks alongside bioretention areas and additional spaces for recreational and wellness activities, which provide ecological corridors and allow high levels of connectivity through the site.</p>

		<p>This site provides c. 36% of the site area as public open space, in addition to communal open spaces (c.5,505sq.m) throughout the entire development.</p> <p>This area also has a wealth of large public open spaces within the immediate vicinity of the site, as such the 2.4ha per 1,000 population across this area which is considered to be achieved between Marley Park, Dodder Riverbank Park and Ballycragh Park to name a few large parks in the immediate area. The proposed new public "Oldcourt Park" will further contribute to this provision.</p>
COS5 Objective 4	<p><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>	<p>Based upon the proposed 523 no. dwellings which will produce c. 1,393 persons (i.e. 219 units x 1.5 persons and 304 units x 3.5 persons), the proposed development will require c. 3.34Ha of public open space. The proposed development provides for c. 7.3Ha of public open space, which equates to c.36% of the application site area.</p>
COS5 Objective 5	<p><i>To require the provision of public open space as part of a proposed development site area in accordance</i></p>	

	<p><i>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 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.</i></p>	
COS5 Objective 6	<p><i>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.</i></p>	<p>Based upon the proposed 523 no. dwellings which will produce c. 1,393 persons (i.e. 219 units x 1.5 persons and 304 units x 3.5 persons), the proposed development will require c. 3.34Ha of public open space. The proposed development provides for c. 7.3Ha of public open space, which equates to c.36% of the application site area.</p>
COS5 Objective 8	<p><i>To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting,</i></p>	

	<i>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>	
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 public park 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 Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021- 2025), the Council's Biodiversity Action Plan (2020-2026) or any</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, hedgerows and shrubs on site to support biodiversity on site.</p>

	<i>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>	The inclusion of a walkway, bio-retention areas and an environmental open space will maximise biodiversity potential of the site, providing for expansion of habitats whilst also providing attractive areas of green open space with high visual and recreational amenity value.
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, with the proposed landscaping and engineering details coordinated.
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>	Public open space is overlooked as far as practicable to achieve maximum passive surveillance.
COS5 Objective 16	<i>To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing 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;</i>	

	<i>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. Outdoor gym equipment is also provided to promote physical activity.</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>
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 accordance with the requirements set out in Chapter 12: Implementation and Monitoring.</i>	<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 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</i>	The chosen play elements throughout the play areas of the development will enable all ages play, exploration of sensory

	<i>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>	input, individual play, group play, and social interaction, imaginative play, climbing, spinning, and sliding movement. 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.
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.
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>	The proposed development includes a c.457sq.m creche which is sized to cater for the predicted demand of c. 126 children from the development itself as well as providing spaces for the existing wider community.
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>	The creche has been purposely sited to allow ease of access from the wider community should they wish to use it, with appropriate set down / drop off points and parking provided for.
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 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</i>	

	<i>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 9: 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 and the growth of locally based energy alternatives in an environmentally acceptable and sustainable manner.</i>	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.

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 to be incorporated onto apartment blocks, which support the transition to cleaner energy generation any aeronautical activity. House owners may apply PV panels in the future.</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>	

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>	A Building Life Cycle Report and Energy & Sustainability Report are submitted as part of this LRD planning application – please refer to these standalone reports.
E7 Objective 8	<i>To support the installation of solar panels on up to 100% of residential roof space</i>	

Table 9: 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 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>	Please refer to the submitted drawings and documents prepared by Pinnacle Consulting Engineers, which includes details of liaison with Irish Water / 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>	A Confirmation of Feasibility (Ref. CDS23009245) has been received from Uisce Éireann regarding the proposed development and is enclosed in Appendix A of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers.
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 – refer to section 6.4.1 of the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects.
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>	Pinnacle Consulting Engineers have liaised with Irish Water / Uisce Éireann and a Confirmation of Feasibility (Ref. CDS23009245) has been received from Uisce Éireann regarding the proposed development and is enclosed in Appendix A of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers.
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 (Irish Water)
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. This LRD application is accompanied by Appropriate Assessment and an

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>	EIAR, both of which will 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 Appropriate Assessment and an EIAR, both of which will 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 12: Implementation and Monitoring and the policies and objectives of this 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.
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>	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".
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</i>	

	<i>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 have been 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>	Please refer to Chapter 13 - Material Assets: Resource & Waste Management – of the submitted EIAR which includes an Operational Waste Management Plan in Appendix 13.2.
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>	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 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>	
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 10: 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 majority of the subject site is currently zoned objective "Res-N": <i>"To provide for new residential communities in accordance with approved area plans"</i> in the CDP. The current proposal for the development of 523 no. residential dwellings and a childcare facility on the subject site is therefore considered appropriate and in compliance with the "Res-N" land-use zoning objective attached to the site.

		<p>A triangular portion of the site at the northwest (adjacent to St. Anne's GAA club) is zoned objective 'RES' – <i>'To protect and / or improve residential amenity.'</i> Under this land use zoning objective, residential development is permitted in principle, with childcare facility being a use that is open for consideration.</p> <p>At the north of the site, a strip of land, currently zoned objective 'OS' – <i>'To preserve and provide for open space and recreational amenities'</i> is included for infrastructural purposes i.e. to accommodate a proposed 225mm Ø Foul Sewer pipe. It is put forward that given the proposed sewer pipe will be located underground, the provision of a use compatible with the open space zoning above same will be possible and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including <i>'all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers...'</i> are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on 'OS' land will not affect the future utility of the 'OS' lands and no, permanent, above ground impacts will occur directly as a result of this development.</p>
<p>Section 12.3.1. – Appropriate Assessment.</p>	<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</i> 	<p>This LRD planning application is accompanied by Appropriate Assessment (AA) and a Natura Impact Statement (NIS) which assert that the proposed development will not have a significant effect on a European Site and may be granted permission.</p>

	<i>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>	
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 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>	This LRD planning application is accompanied by an EIAR which includes an Ecological Impact Assessment i.e. Chapter 5 - Biodiversity, carried out by Enviroguide Consulting 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.
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>	This LRD planning application is accompanied by Appropriate Assessment (AA) and a Natura Impact Statement (NIS) which assert 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>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</i>	This LRD planning application is accompanied by an EIAR which includes an Ecological Impact Assessment i.e. Chapter 5 - Biodiversity, carried out by Enviroguide Consulting who have been surveying the subject site over the past year. Mitigation and monitoring measures are included for the small quantum of invasive

	<i>to comply with the provisions of the European Communities Birds and Habitats Regulations, 2011 (S.I. 477 / 2011).</i>	species found on the site. Please refer to chapter 5 of the EIAR for details.
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 Archaeology Plan 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 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>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 5.3.13 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 and Development Management	<p><i>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. 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></p>	<p>Please refer to the submitted Landscape Design Rationale for details on how the proposed development has had regard to the protection and enhancement of Green Infrastructure throughout the proposed development, including the incorporation of SuDS features into the proposed design.</p>
Section 12.4.2. – Green Space Factor	<p><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></p>	<p>The proposed development achieves a Green Space Factor of 0.5– please refer to section 7.3 (page 80) of the submitted Landscape Design Rationale for details.</p>
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</i> 	<p>Where necessary, a 10m buffer will be adhered to from the top of the bank of any streams and watercourses on the site. The coordinated submitted engineering and landscaping proposals illustrate same.</p>

	<p><i>the top of the riverbank is maintained / reinstated along all watercourses within any development site. This is a minimum and should be considered in light of the bullet points above;</i></p> <ul style="list-style-type: none"> ▪ <i>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.</i> 	
<p>Section 12.5.1 – Universal Design</p>	<p><i>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.</i></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.</p>
<p>Section 12.5.1 – Design Considerations and Statements</p>	<p><i>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</i></p>	<p>Please refer to section 4.1.5 of the submitted Planning Statement which sets out how the proposed development complies with “the Plan Approach”.</p> <p>Davey+Smith Architects have prepared the submitted Architectural Design Statement which sets out details of design concept for the scheme, details of the character areas/neighbourhood zones proposed and also includes details of finishes and materiality to be applied to the proposed development.</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 5.3.13 of this Statement sets out the proposed development's compliance with Appendix D of the aforementioned 2024 Guidelines, i.e. the design</p>

	<i>and how it contributes to placemaking and the identity of an area.</i>	checklist and its key indicators for quality urban design that have been applied to the proposed development – please refer to same.
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 3 storeys, with just one building i.e. Block C being a mix of 3-4 storeys. The proposed density adheres to national guidance for an outer suburban site such as this, with a net density of 42 units per hectare achieved. Please refer to the preceding sections 5.1 and 5.3 of this Statement for details of how the proposed development complies with national planning policy concerning building height and density.
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</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>The proposed development will deliver “Oldcourt Park” which will be a significant new neighbourhood park.</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 Landscape Design Rationale prepared by Gannon & Associates for details of the proposed play equipment and materials.</p>

	<p><i>provision of a network of well-connected public spaces and streets, with materials, and signage that is easily interpreted by all;</i></p> <ul style="list-style-type: none"> ▪ <i>Crossing points and routes should be clearly identifiable, appropriately located with respect to facilities and follow pedestrian desire lines;</i> ▪ <i>Quality of materials, especially at significant locations is important to sustainable placemaking.</i> 	<p>The submitted Architectural Design Statement & Landscape Design Rationale provide details on overall design concept for the proposed development, including details on <i>inter alia</i>:</p> <ul style="list-style-type: none"> ▪ the creation of four district Neighbourhood Zones, ▪ details on materials and finishes for buildings and landscaping, ▪ planting and play specifications, ▪ how the development is legible from a wayfinding perspective, ▪ creates strong permeability and connectivity linings which are prioritised for pedestrian and cyclists, ▪ details on how car parking is handled, ▪ universal accessibility. <p>Please refer to the above-mentioned standalone reports for further details.</p>
<p>Section 12.5.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)</p>	<p><i>Key Principles: Identity and Sense of Place; Moving Around; Safe, Inviting and Inclusive; Gateway Features and Signage.</i></p>	

Table 11: 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 polices/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
<p>Section 12.6.1 – Mix of Dwelling Types</p>	<p><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)</i></p>	<p>Please refer to section 7.7 of the submitted Planning Statement which provides a breakdown of the proposed dwelling mix.</p> <p>In addition, the preceding section 5.2 of this Statement confirms that the proposed apartment mix complies with SPPR1 of the Apartment Guidelines.</p>

	<i>and there shall be no minimum requirement for apartments with three or more bedrooms.</i>	
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 270 no. 3 bed apartment/duplex units and houses which equates to c.52% 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</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.

	<i>to urban design and ensuring efficient use of urban land.</i>	
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 section 7.7 of the submitted Planning Statement which provides a breakdown of the proposed dwelling mix, which provides for a mix of 1, 2, 3 & 4 bedroom dwellings in the form of houses, duplex units and apartments.

Table 12: 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 proposals for housing must be required to accord with or exceed the minimum private open space standards set out in Table 12.20 of the CDP. Generally, Private Open Space for housing should be located	Please refer to section 7.7 of the submitted Planning Statement which provides a breakdown of the proposed dwelling mix and unit sizes. Please refer to the submitted HQA which details the units, room storage and private open space sizes for all of the proposed dwellings.

behind the front building line of the house and be designed to provide for adequate private amenity.	Details of the proposed private open space for the houses are detailed on the submitted site layout plans.																														
<p>Apartments</p> <p>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.</p> <p>Table 12.21: Minimum Standards for Apartments</p> <table border="1" data-bbox="129 810 1099 1305"> <thead> <tr> <th>Type of Unit</th> <th>Apartment</th> <th>Private Open Space</th> <th>Communal Open Space</th> <th>Storage</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>37 sq m</td> <td>4 sq m</td> <td>4 sq m</td> <td>3 sq m</td> </tr> <tr> <td>One bedroom</td> <td>45 sq m</td> <td>5 sq m</td> <td>5 sq m</td> <td>3 sq m</td> </tr> <tr> <td>Two bedrooms (3 person)</td> <td>63 sq m</td> <td>6 sq m</td> <td>6 sq m</td> <td>5 sq m</td> </tr> <tr> <td>Two bedrooms (4 person)</td> <td>73 sq m</td> <td>7 sq m</td> <td>7 sq m</td> <td>6 sq m</td> </tr> <tr> <td>Three bedrooms (5 person)</td> <td>90 sq m</td> <td>9 sq m</td> <td>9 sq m</td> <td>9 sq m</td> </tr> </tbody> </table>	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	<p>Please refer to the submitted HQA which details the units, room, storage and private open space sizes for all of the proposed apartments.</p>
Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage																											
Studio	37 sq m	4 sq m	4 sq m	3 sq m																											
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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 6 no. such units (c.2%) in total are proposed and this is demonstrated in the submitted HQA.
Apartments – Private Space	
<ul style="list-style-type: none"> ▪ 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. ▪ 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. 	<p>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.</p> <p>No balconies overhang public paths, and all private open spaces are clearly demarcated to ensure privacy for residents.</p>
Apartments – Communal / Semi-Private Space	
High quality communal open space should also be provided in schemes that include apartments.	A variety of communal open spaces are provided for throughout the site and a schedule of same is set out under section 7.16 of the submitted Planning Statement.

<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 	
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	
<p>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.</p>	<p>As per the submitted architect's drawings the internal floor to ceiling heights are a minimum of 2.7m.</p>
Apartments – Lift and Stair Cores	
<p>In line with SPPR 6 of the Apartment Guidelines, a maximum of 12 apartments per floor per core may be provided in apartment schemes.</p>	<p>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 Block C. Please refer to the submitted block plans prepared by Davey + Smith Architects for full details.</p>

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 3-4 storeys in one location i.e. Block C, all other building heights are 2 and 3 storeys.
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 provided, should be subject to appropriate landscape design and boundary treatment. 	<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>
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 	<p>There are only 3 no. units in Block C that are single aspect.</p> <p>The remainder of the proposed apartments are dual and triple aspect.</p> <p>The proposed development therefore complies with SPPR4 of the Apartment Guidelines.</p>

<p>are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable,</p> <ul style="list-style-type: none"> ▪ 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>Refer to the submitted HQA and section 7.11 of the enclosed Planning Statement for details of aspect.</p>
<p>Apartments – Sunlight / Daylight</p>	
<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 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 	<p>This LRD planning application is accompanied by a daylight / sunlight analysis prepared by CS Consulting – please refer to same for full details.</p>
<p>Apartments – Access Cores and Communal Areas</p>	
<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. 	<p>All ground floor units have independent own door access.</p>

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> <p>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.</p>	<p>Please refer to the submitted Engineering Assessment Report for details on how the proposed apartment blocks will be serviced.</p> <p>Please also refer to the enclosed Energy & Sustainability Statement.</p>

Table 14: 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										
<p>Section 12.6.10. Public Open Space</p> <p>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.</p> <p>Table 12.22: Minimum Public Open Space Standards</p> <table border="1" data-bbox="136 632 1120 981"> <thead> <tr> <th data-bbox="136 632 687 708">Land Use</th> <th data-bbox="687 632 1120 708">Public Open Space Standards (Minimum)</th> </tr> </thead> <tbody> <tr> <td data-bbox="136 708 687 759">Overall Standard</td> <td data-bbox="687 708 1120 759">2.4 Ha per 1,000 Population</td> </tr> <tr> <td data-bbox="136 759 687 842">New Residential Development on Lands Zone RES-N</td> <td data-bbox="687 759 1120 842">Minimum 15% of site area</td> </tr> <tr> <td data-bbox="136 842 687 925">New Residential Development on Lands in Other Zones including mixed use</td> <td data-bbox="687 842 1120 925">Minimum 10% of site area</td> </tr> <tr> <td data-bbox="136 925 687 981">Institutional Lands / 'Windfall' Sites</td> <td data-bbox="687 925 1120 981">Minimum 20% of site area</td> </tr> </tbody> </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	<p>The proposed development caters for 219 no. dwellings with two or fewer bedrooms and 304 no. dwellings with three or more bedrooms. The occupancy rate for the proposed development is therefore as follows:</p> <ul style="list-style-type: none"> - 219 no. dwellings x 1.5 persons = 328.5 persons - 304 no. dwellings x 3.5 persons = 1,064 persons - Total occupancy = 1,392.5persons <p>Based on a provision of 2.4 hectares of public open space per 1,000 population, the proposed development therefore requires the following quantum of public open space:</p> <p>1,393 persons x 2.4 (hectares of open space) / 1000 (population) = 3.34 hectares (33,432 sq.m) of public open space.</p> <p>The proposed development caters for approximately 73754.8sq.m (7.37 hectares) of public open space and therefore complies with section 8.7.3. of the existing CDP.</p>
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										
<p>Public Open Space - Access</p> <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; 	<p>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.</p>										

<ul style="list-style-type: none"> ▪ 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. 	<p>A variety of recreational forms, including formal and natural play, are catered for as detailed in the submitted Landscape Design Rationale by Gannon & Associates – please refer to same.</p>
<p>Public Open Space – Recreation Facilities</p> <p>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.</p>	<p>Sections 6.2.2 and 7.5 of the enclosed Landscape Design Rationale provides details of the proposed recreational facilities and play specification respectively – please refer to same.</p>
<p>Public Open Space – Green Infrastructure, Biodiversity and Sustainable Water Management</p>	
<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>A full tree and hedgerow survey, prepared by Arborist Associates is submitted with this LRD planning application – please refer to same.</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 (section 7.1) – please refer to same.</p>
<p>Public Open Space - Accessibility</p>	
<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 	<p>Please refer to the submitted Landscape Design Rationale for details on materiality and the function of the open spaces.</p>

<p>the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops;</p> <ul style="list-style-type: none"> ▪ Facilities, equipment and information materials should be accessible for all regardless of age or ability. 	
<p>Public Open Space - Safety</p>	
<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; ▪ 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>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.</p> <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 	<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>

<p>predominantly 3 beds or greater, provision will be required for 10 units or over;</p> <ul style="list-style-type: none"> ▪ 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; ▪ 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. 	
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Table 15: 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.	<p>Bicycle parking for the proposed houses will be catered for within the curtilage of the individual properties.</p> <p>For the proposed duplex blocks (Duplex Block Types A, B, C, D, E & F) and the proposed "E" type "Urban House", it is considered the nature / design of these building typologies will allow the proposed</p>

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
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	-

ground floor units to accommodate bicycle parking within the curtilage of the property i.e. within the unit itself or securely located within the ground floor terrace provided for each unit.

The proposed development will require 595 no. long-term parking spaces for the proposed apartments and duplex units and 134 no. short-term spaces i.e. a total provision of 729 no. parking spaces.

In total, 1,268 no. bicycle parking spaces are provided for.

Bicycle Design / Provision

- **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;

Please refer to the submitted Davey+Smith drawing no. MP22 "Proposed Bikes Location" which identifies the type and location of proposed parking facilities across the entire development.

In total, 1,268 no. bicycle parking spaces are provided for.

<ul style="list-style-type: none"> ▪ 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; ▪ 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. 	
<p>Section 12.7.2 – Traffic and Transport Assessments</p>	
<p>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.</p>	<p>Please refer to the submitted Traffic & Transport Assessment prepared by Pinnacle Consulting Engineers.</p> <p>In addition, Chapter 12 - Material Assets: Transportation of the submitted EIAR, provides a traffic impact assessment.</p>
<p>Car Parking Standards</p>	
<p>Tables 12.25 and 12.26 set out the Maximum Parking rates for non-residential and residential development.</p>	<p>The proposed development provides for a total of 746 no. car parking spaces, which is less than the maximum standards of the CDP, and includes 66 no. visitor car parking spaces, and 7 no. spaces for the creche. Overall, 673 no. long term the car parking spaces are afforded to the proposed 523 no. dwellings which equates to a ratio c.1.29 spaces per dwelling.</p> <p>Regard has also been had to the 2024 Sustainable Residential Development & Compact Settlement Guidelines which require that 1.5 no. spaces per dwelling be provided in accessible locations, and the 2023 Apartment Guidelines.</p>

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
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

The justification for a reduced car parking rate for the proposed development is based on the fact the proposed development caters for the future provision of 2 no. new bus stops on the main link street traversing the development and thus, future residents will have easy access to planned high frequency urban bus services and nearby employment centres. Please refer to section 3 of the submitted TTA prepared by Pinnacle Consulting Engineers for more details.

Section 12.7.5 Car Parking / Charging for Electric Vehicles (EVs)

- 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.

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"> ▪ 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. ▪ 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. 	
<p>Section 12.8.4 Early Childhood Care and Education Facilities</p>	
<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>	<p>The proposed development includes for a childcare facility of c.457sq.m located in a dedicated 2 storey building, located in Neighbourhood Zone 3, in the north-western part of the development. The proposed childcare facility is of a size capable of catering for c.126 no. childcare places, based on the minimum stated floor space standards of the 2001 Childcare Facilities Guidelines.</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. 	
<p>Section 12.11.1 Water Management</p>	
<p>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.</p> <p>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.</p> <p>In general, all new developments will be required to incorporate Sustainable Urban Drainage Systems (SuDS).</p>	<p>The proposed development provides for Sustainable Urban Drainage Systems (SuDS) measures, as detailed in the submitted Engineering Planning Report (section 6). In addition, the submitted Landscape Design Rationale (sections 5.3 & 6.4.1) provide details of how SuDS measures have been incorporated into the overall landscape design of the proposed development.</p> <p>This LRD planning application is also accompanied by a Site-Specific Flood Risk Assessment (SSFRA), prepared by Kilgallen & Associates Consulting Engineers.</p> <p>Please refer to both of the above-mentioned documents for further details.</p>
<p>Section 12.11.3 Waste Management</p>	
<p>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.</p>	<p>Please refer to Chapter 13 - Material Assets: Resource & Waste Management of the submitted EIAR which includes a Resource & Waste Management Plan, in Appendix 13.1.</p>
<p>Section 12.11.4 Environmental Hazard Management</p>	
<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>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,</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>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>	<p>and the findings of the Ecological Impact Assessment (EclA) which is set out in Chapter 5 – Biodiversity of the submitted EIAR.</p>
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Table 16: Consistency with the South Dublin CDP Chapter 12.

Evaluation of Consistency with the South Dublin CDP

Given all the foregoing as set out in Section 7.1. 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 considered acceptable and granted permission.



7.2 Ballycullen-Oldcourt Local Area Plan 2014 (as extended)

This section contains an assessment of the proposed development's consistency with the Ballycullen-Oldcourt Local Area Plan 2014 (as extended).

The Ballycullen-Oldcourt Local Area Plan (hereafter "LAP") was adopted in June 2014 and extended until June 2024, which we understand is further extended until September 2024. It is likely that by the time a decision is due to be made of this proposed LRD planning application that the LAP may have fully expired. Notwithstanding same, this section of the Statement of Consistency sets out how the proposed development complies with the LAP.

The adoption of the LAP resulted from the need to develop approximately 90 hectares (222 acres) of undeveloped lands along the Ballycullen-Oldcourt fringe as a new residential community and, as such, the overall objective of the LAP is to provide a development framework for the construction of approximately 1,600 additional dwellings (approximately 4,600 persons) at a range of densities appropriate to the area and in tandem with the delivery of required social infrastructure.

Within the LAP, the entirety of the subject application site is zoned Objective A1 – *"To provide for new residential communities in accordance with approved Area Plans"*. This is also reflected in the existing South Dublin County Development Plan 2022-2028, whereby the subject application site is, in the majority, zoned Objective RES-N – *"To provide for new residential communities in accordance with approved area plans"*. The proposed development for 523 no. dwellings on a site of c. 20.4 hectares is therefore in compliance with the land-use zoning objective(s) attached to the subject application site.

Section 5 of the LAP details the development strategy for the Plan Lands and within same, two development options are presented. These options are based on the relocation (Option A) and retention (Option B) of the existing 220kV overhead electrical transmission lines that traverse the western side of the Plan Lands. At the time of submitting this LRD planning application the 220kV overhead electrical transmission lines remain in-situ and, therefore, Option B is the relevant development option with regard to the current development proposal. However, please note that included in this application are site layout plans (drawing no.s MP15, MP16 & MP17) illustrating how the remainder of the applicant's lands (outlined in blue) may be developed in the future if (a) the lines remain in-situ – Option B or (b) are relocated - Option A. Details regarding the overhead ESB wires are set out in section 7.5 of the submitted Planning Statement – please refer to same.

The LAP strategy divides land use and density into three distinct areas being: lower slope lands, mid slope lands and upper slope lands. Furthermore, to develop a sequenced rationale, these three areas generally correspond with the categorisation of the Plan Lands into three development areas being: highly constrained, partially constrained, or relatively unconstrained lands. Most of the subject application site is identified as being on the mid slope lands, with the southern parts of the site being on the upper slope lands. Most of the subject application site is identified as being within the partially constrained lands, with parts of the site being on the highly constrained and relatively unconstrained lands.

The LAP includes for four framework strategies (Accessibility and Movement Strategy, Green Infrastructure Strategy, Land Use and Density Strategy and Built Form & Design) and a Phasing Strategy. It is noted in section 5.1.1. of the LAP that the framework strategies are indicative and may be amended where there is a strong justification and planning gain demonstrated at application stage. Appendix 1 of the LAP details the Plan Objectives that accompany the four framework strategies. Table 24 overleaf details the objectives of the LAP in relation to the four framework strategies and the proposed development's compliance with same.



Accessibility and Movement Strategy Object	Proposed Development's Compliance
<p>Objective AM1: All development proposals that include routes for vehicular movement or sections of such routes for movement, regardless of extent, shall demonstrate compliance with the street network strategy illustrated in Figure 5.1. (Section 5.2). New streets shall follow the contours of the land in a concentric fashion in order to minimise the impact on the landscape and on natural drainage.</p>	<p>The design of the main east-west link street through the site has followed the guidance for a "link street", as set out in the LAP, with the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers confirming that the proposed development is DMURS compliant.</p>
<p>Objective AM2: Development shall help create and link with a curvilinear layout of streets. All development shall avail of every possibility to link and provide routes into the planned street network and provide a choice of multi-directional connections to existing and planned local facilities and services.</p>	<p>The site layout plan provides for a highly accessible and permeable layout, including the delivery of a major link street through the western part of the Plan lands. Connections to adjoining lands outside of the subject site are also provided for, with ample pedestrian and cyclist paths / connections also accommodated as part of the submitted site layout plan.</p>
<p>Objective AM3: All development proposals that include routes for vehicular movement or sections of such routes for movement, regardless of extent, shall implement and adhere to the street hierarchy and functions detailed in Table 5.1 (Section 5.2) and the requirements of the <i>Design Manual for Urban Roads and Streets (DMURS)</i>.</p>	<p>The design of the streets through the site has followed the guidance set out in the LAP, with the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers confirming that the proposed development is DMURS compliant.</p>
<p>Objective AM4: Development proposals shall identify the movement function of each street in accordance with its strategic importance within the Plan Lands. The movement function of each street shall be reflected by an appropriate design speed and series of design measure that promote a self regulating street environment.</p>	
<p>Objective AM5: All neighbourhoods shall be afforded direct and convenient vehicular, pedestrian and cyclist access to Main Link and Local Link Streets. Local Streets shall be safe, barrier free, overlooked by development and shall have a design speed of 30kph.</p>	
<p>Objective AM6: The street network shall be designed to maximise route choice for pedestrians and cyclists.</p>	
<p>Objective AM7: Streets shall be designed using a more integrated approach to pedestrian, cycle and vehicular movement in accordance with the requirements of the <i>DMURS</i> and the principles of universal design</p>	



<p>to include for people of all ages and abilities. Sufficient provision shall be provided for pedestrian and cyclist movement on both sides of each street (with the exception of shared surface streets) with reduced carriageway widths for vehicles.</p>	<p>The submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers confirming that the proposed development is DMURS compliant.</p>
<p>Objective AM8: Local Streets shall be designed for speeds conducive to shared pedestrian, cycle and vehicular movement.</p>	
<p>Objective AM9: Cycling and walking shall be encouraged within and through the Plan Lands by creating a connected network of safe and accessible pedestrian and cycle routes that serve all streets and spaces including existing streets. All neighbourhood blocks shall be afforded direct pedestrian and cyclist access to Main Link and Local Link Streets and direct or indirect routes to school and community facilities especially parks, open spaces, local shopping facilities and public transport. There shall be no barriers to pedestrian or cyclist movement between housing developments including between new and existing developments and no barriers shall be erected along streets with limited exceptions for garden boundaries.</p>	
<p>Objective AM10: Junctions shall be designed to provide for safe and convenient pedestrian and cyclist movement in accordance with the <i>DMURS</i>. Roundabout junctions are actively discouraged. Existing roundabout junctions along Stocking Avenue and Hunters Road shall be upgraded to signalised junctions that incorporate pedestrian and cyclist crossings. Some roundabouts may be upgraded for improved pedestrian and cycle crossing movement (see Fig 5.1 and Section 5.2). The upgraded junctions should be carried out as part of adjoining development and shall be designed in accordance with the <i>DMURS</i>.</p>	
<p>Objective AM11: All commercial, community and school development shall include for bicycle parking facilities designed in accordance with the recommendations set out in the <i>National Cycle Manual (2011)</i> and the Standards and Design Criteria section of this LAP.</p>	



<p>Objective AM12: Planning applications for residential, commercial and employment development shall provide for or integrate with direct, safe and attractive pedestrian and cycle routes to existing and planned public transport stops and termini.</p>	<p>The site layout plan provides for a highly accessible and permeable layout, including connections to adjoining lands outside of the subject site are also provided for, with ample pedestrian and cyclist paths / connections also accommodated as part of the submitted site layout plan.</p>
<p>Objective AM13: No barriers shall be erected along Main Link Streets and existing barriers adjacent to new development especially railings along Oldcourt Road and Stocking Avenue shall be removed for improved street frontage and access. This should be carried out as part of any development that bounds or is located adjacent to the aforementioned streets.</p>	<p>No barriers are proposed on the east-west main link street.</p>
<p>Objective AM14: Manage traffic and vehicle speed via the creation of a self regulating street network. The network shall be designed to attract larger volumes of traffic to the more strategic links by offering users a legible and direct route throughout the Plan Lands at more moderate speeds. Through traffic shall be discouraged from local streets via a range of design measures that passively calms traffic and/or filters permeability.</p>	<p>The submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers confirming that the proposed development is DMURS compliant.</p>
<p>Objective AM15: Design streets for slow vehicular speeds from the outset with designs that accord with the <i>DMURS</i> and incorporate a combination of measures including closer proximity of buildings, narrow carriageways, frequent crossing points, reduced visibility splays, on-street parking, tighter corner radii, shared surfaces and horizontal and vertical elements such as low traffic tables at junctions and pinch points. This will include a design speed of 30 – 40 kilometres per hour for Link Streets and 10 - 30 kilometres per hour for Local Streets.</p>	
<p>Objective AM16: Assess all interfaces between proposed developments, existing housing and undeveloped lands at planning application stage and ensure that all proposed development connects and integrates with the existing and planned network of streets and spaces. All developments shall seek to create permeable layouts and encourage surveillance of streets and spaces.</p>	<p>The proposed development provides for direct and accessible connections off the east-west main link street, while the site layout plan also considers future connections to remaining undeveloped lands. In addition, connections to adjoining lands/development is also catered for.</p>



<p>Objective AM17: Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian and cycle access to community facilities, schools, open spaces, local shopping, or public transport stops for future and existing residents.</p>	<p>The site layout plan provides for a highly accessible and permeable layout, including the delivery of a major link street through the western part of the Plan lands. Connections to adjoining lands outside of the subject site are also provided for, with ample pedestrian and cyclist paths / connections also accommodated as part of the submitted site layout plan.</p>
<p>Objective AM18: Upgrade existing cul-de-sacs to provide for, at a minimum, pedestrian and cyclist access. Temporary cul-de-sacs shall only be permissible between occupied housing and adjacent construction works and shall exclude turning circles, hammerhead junctions and masonry walls. The temporary nature of any such cul-de-sacs should be clearly annotated and illustrated on planning application drawings.</p>	<p>N/A</p>
<p>Objective AM19: Be subject to planning conditions that require the erection of signage on any temporary barriers or cul-de-sacs between proposed and existing or future streets that communicates the temporary nature of the cul-de-sacs/barriers and the planned provision of a through street.</p>	<p>This is noted.</p>
<p><u>Green Infrastructure Strategy Objectives</u></p>	<p><u>Proposed Development Compliance</u></p>
<p>Objective GI1: Promote the sustainable collection and on-site retention of surface water for delayed discharge to the local surface water sewerage system and for use as an on-site resource and means of creating a biodiversity network that will retain and develop existing flora and fauna.</p>	<p>The proposed development provides for Sustainable Urban Drainage Systems (SuDS) measures, as detailed in the submitted Engineering Planning Report (section 6), all of which have been carefully integrated into the proposed landscaping design of the scheme, thus enhancing the green infrastructure network, and biodiversity on site.</p>
<p>Objective GI2: Ensure that a linked SUDS network shall be implemented fully across the Plan Lands in accordance with the requirements of the <i>Greater Dublin Strategic Drainage Study</i> (2005). All proposed developments shall contribute to the achievement of this integrated network in order to reduce surface water run-off and to minimise the risk of flooding. This shall include for a series of attenuation areas (ponds, basins and reedbeds) set within parklands and wetland areas within linear green spaces. The size and depth of the proposed SUDS retention areas shall be designed in accordance with the policies of the Greater</p>	<p>In addition, the submitted Landscape Design Rationale (sections 5.3 & 6.4.1) provide details of how SuDS measures have been incorporated into the overall landscape design of the proposed development.</p> <p>Please refer to both of the above-mentioned documents for further details.</p>



<p>Dublin Drainage Study and the guidelines provided on the irishsuds.com website.</p>	<p>The proposed landscape design provides for bioretention parks – please refer to the submitted landscape design for details.</p>
<p>Objective G13: Ensure that existing natural streams and drainage ditches shall be retained and augmented with grassed swales within a series of green corridors, wetland areas and parks to form an integral conveyance and attenuation system as part of the overall SUDS network.</p>	
<p>Objective G14: Ensure that SUDS elements such as swales, ponds, basins and reedbeds and other major SUDS features are planted with suitable riparian vegetation and water tolerant planting that will clean and attenuate surface water flow.</p>	
<p>Objective G15: Ensure that all newly created swales utilised within the SUDS network shall be of an appropriate (shallow and wide) dimension to allow for ease of maintenance, including mowing, and in the interest of health and safety where practical.</p>	
<p>Objective G16: Ensure that all individual developments and associated infrastructure, including streets and spaces, shall incorporate on-site SUDS components such as those identified in the Standards Section (Appendix 2) of this Local Area Plan. Features such as porous paviers, green roofs, rainwater recycling systems and soakaways should be utilised to intercept surface water before reaching the overall SUDS network.</p>	
<p>Objective G17: Be subject to planning conditions that require all existing and proposed ditches, culverts and SUDS elements to be cleared (in a manner that is in accordance with best ecological practise to protecting Flora and Fauna) and kept free of debris, waste and building rubble before, during and after construction.</p>	<p>The developer will adhere to any conditions attached to a forthcoming grant of permission in compliance with this objective.</p>
<p>Objective G18: All planning applications for development in areas at risk of flooding shall be accompanied by a Flood Risk Assessment carried out at the site-specific level in accordance with <i>The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)</i>. The scope of flood risk assessment should depend on the type and scale of development and the sensitivity of the area. Site specific flood risk assessment of lands</p>	<p>This LRD planning application is also accompanied by a Site-Specific Flood Risk Assessment (SSFRA), prepared by Kilgallen & Associates Consulting Engineer – please refer to same for full details.</p> <p>The submitted SSFRA concludes “<i>The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is</i></p>



<p>identified as being at risk of flooding will entail Stage 3 Detailed Risk Assessment carried out by suitably qualified and independent hydrological consultants that are acceptable to the Council. Where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces.</p>	<p><i>therefore appropriate from a flood risk perspective”.</i></p>
<p>Objective GI9: All proposals, particularly those within the catchment of the Ballycullen Stream, shall demonstrate and ensure that they do not increase the risk/impact of flooding on downstream estates including Castlefield Manor, Glenvara, Glenlyon and Homeville.</p>	<p>This is noted and as outlined above, the submitted SSFRA concludes <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>Objective GI10: Development proposals in the vicinity of high and extreme groundwater vulnerability areas shall be accompanied by sufficient details to protect groundwater sources from pollution during construction and development phases. These details shall be in accordance with the requirements of the <i>South Dublin Groundwater Protective Scheme</i> (Geological Survey of Ireland, 2011).</p>	<p>Please refer to the submitted Engineering Planning Report by Pinnacle Consulting Engineers for details. In addition, the submitted EIAR assesses the impact of the proposed development on water / ground water – refer to Chapter 7.</p>
<p>Objective GI11: It is an objective of this LAP to ensure that all extensive development proposals maximise the opportunities for enhancement of existing biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance biodiversity and avoid or minimise loss of biodiversity.</p>	<p>The proposed layout has been designed to maintain and enhance existing features of biodiversity value as much as feasibly possible. The submitted EIAR (Chapter 5 – Biodiversity) and Appropriate Assessment, prepared by Enviroguide Consulting as suitably qualified professionals, ensure appropriate measures are in place to avoid and/or minimise loss of biodiversity. Please refer to both of the aforementioned assessment for full details.</p>
<p>Objective GI12: Ensure that developments incorporate biodiversity corridors and heritage features within their designs and layouts.</p>	<p>The enclosed landscaping proposals seek to protect and enhance the green infrastructure network and biodiversity on the site.</p> <p>Existing trees / hedgerows, including townland boundaries are protected, insofar as is possible, save for the delivery of the east-west link street.</p>
<p>Objective GI13: Create an integrated network of green corridors and wetland areas (a minimum of 15 metres wide) by way of linking, preserving and incorporating hedgerows (especially townland and parish boundaries), wildlife corridors, SUDS features and existing streams.</p>	



<p>Objective GI14: Protect and enhance historic field, townland and parish delineations including their associated hedgerows and ditches and require all relevant planning applications to detail how such delineations will be enhanced, reinstated or incorporated.</p>	<p>Where necessary, the required buffers / corridors are provided for.</p>
<p>Objective GI15: Require green corridors and wetland areas to be carefully designed to balance the protection of biodiversity together with the conveyance of water and accommodation of walking and cycling routes.</p>	<p>One of the proposed landscaped features includes a bio-retention park, which is designed to blend harmoniously with the natural environment and the main park's layout. It serves a crucial ecological role by acting as a sustainable stormwater management system, mitigating water runoff effects. Through its strategically designed depressions and vegetation, the park effectively absorbs, filters, and cleanses stormwater, removing pollutants and preventing them from contaminating local water bodies. This function not only protects the environment but also improves the quality of nearby water resources.</p> <p>Beyond its environmental benefits, the bio-retention park enhances community well-being with its winding pathways and lush greenery, creating a peaceful space for recreation, relaxation, and nature connection. The running track, which follows the park's organic lines, promotes physical activity, encouraging a healthy lifestyle for residents and visitors. In essence, the bio-retention park exemplifies sustainable urban planning by seamlessly integrating aesthetic appeal with ecological functionality, providing a natural oasis within the urban landscape.</p>
<p>Objective GI16: Allow for limited sections of field boundaries to be carefully altered where a need has been clearly demonstrated on the basis of accessibility in terms of pedestrian and cyclist movement and the creation of successful streets and spaces.</p>	
<p>Objective GI17: Prohibit the culverting of watercourses and require structures adjacent to watercourses to be set back a minimum distance of 10 metres from the top of the bank. These corridors shall be landscaped to aid in the absorption of storm water flows and should also accommodate tracks and trails where possible.</p>	<p>No watercourses are proposed to be culverted and the required 10m buffer strip from the top of the bank will be adhered to, as required.</p>
<p>Objective GI18: Buildings, streets and spaces should be designed and arranged to respond and flow with the area's contours and natural drainage features.</p>	<p>It is evident from the site layout plan and site sections submitted that great care has been taken to carefully position the proposed housing on the site so that it successfully assimilates into its setting.</p>
<p>Objective GI19: All development including streets, buildings and spaces shall be laid out to comply with South Dublin County Council Development Plan policy on Steep Sites and shall be designed to circumvent</p>	



<p>the need for intrusive engineered solutions such as cut and filled platforms, embankments or retaining walls.</p>	<p>The enclosed architects drawings and design statement clearly demonstrate how the topography of the site has been carefully handled by the stepping of buildings throughout in a considered manner.</p> <p>The submitted EIAR includes a landscape and visual impact assessment (Chapter 15 – The Landscape) and associated photomontages are also enclosed which illustrate how sensitively the proposed development has been designed to assimilate into its receiving environs.</p>
<p>Objective GI20: Proposals for development on steep sites shall gently ascend the contours of the Plan Lands with unique design solutions such as split-level housing where multiple storey housing is permissible.</p>	<p>Enviroguide Consulting have been appointed as the project ecologists and have undertaken a series of surveys on the site over the past twelve months. The enclosed EIAR includes an assessment of the proposed development on biodiversity (Chapter 5 – Biodiversity) – please refer to same.</p>
<p>Objective GI21: It is an objective of this LAP to require the submission of habitat assessments to include flora and fauna studies (to include large mammal and bat surveys) as part of each relevant planning application for development and require the implementation of appropriate measures that ensure the protection of Protected Species and their habitats.</p>	<p>The proposed layout has had regard to the existing biodiversity, trees and hedgerows on site, which are to be significantly retained as part of the proposed development. Having regard to same, the proposed movement strategy through the site provides for maximum pedestrian and cyclist permeability and connectivity throughout and to adjoining lands. A variety of walking and running tracks have also been designed into the layout.</p>
<p>Objective GI22: Habitats and species identified as having a high or moderate local value shall be protected, retained, incorporated and provided for within developments.</p>	<p>The proposed development includes for off street tracks and trails to ensure pedestrian / cyclist prioritisation and aids the overall links in the area to the Dublin Mountains.</p>
<p>Objective GI23: Applications for development shall identify historic paths and seek to upgrade and integrate such into a permeable network of tracks and trails for pedestrians and cyclists.</p>	
<p>Objective GI24: Upgraded and new tracks and trails should correspond with ditches, streams, surface water attenuation areas and aid in the creation of a permeable network of linked open spaces including green corridors, green buffers, neighbourhood parks, wetland areas and playing pitches. Tracks and Trails should incorporate mitigating measures that protect flora, fauna and habitats through sensitive design, lighting and construction.</p>	
<p>Objective GI25: The tracks and trails network shall be developed to link with the Dublin Mountains (especially Montpellier Hill) and existing routes towards local historic landmarks and structures including the Hell</p>	



<p>Fire Club, Saint Colmcille's Well and Carthy's Castle.</p>	
<p>Objective GI26: Applications for development should clearly annotate and mark proposed tracks and trails and links to adjacent and surrounding lands. Conditions shall be attached to planning applications to clearly state that links to surrounding and adjoining lands shall be kept open and free from development (including barriers) and shall form part of a strategic network of pedestrian and cycle routes.</p>	<p>The submitted architectural and landscaping drawings and details, prepared by Davey + Smith Architects and Gannon + Associates respectively, detail the proposed tracks and trails and permeable links to adjacent lands, and we refer the reader to same for details. The note on conditions attached to any forthcoming permission is acknowledged.</p>
<p>Objective GI27: Upstanding archaeologically remains and local historic features such as double ditch paths, gate pillars, stone walls and stone culverts shall be protected, preserved, or enhanced by development and incorporated into streets or open spaces.</p>	<p>The proposed development has been designed to incorporate existing features of the site, as feasible and as applicable. The enclosed EIAR includes an archaeological / culture heritage assessment of the subject site – refer to Chapter 14 – Archaeology & Cultural Heritage.</p>
<p>Objective GI28: Where significant archaeologically features/deposits are discovered during archaeological investigations, it shall be a priority to provide for in-situ preservation especially features/deposits discovered during construction or investigation on lands to be occupied by planned open space(s).</p>	<p>The enclosed EIAR includes an archaeological / culture heritage assessment of the subject site – refer to Chapter 14 – Archaeology & Cultural Heritage. Where significant archaeological features are discovered, appropriate mitigation and monitoring measure will be put in place for the construction stage to ensure an appropriate level of preservation.</p>
<p>Objective GI29: Development on lands that benefit from existing and potential views of local upstanding monuments and protected structures including the Hellfire Club, Carthy's Castle, Orlagh College and Woodtown Manor shall incorporate and enhance the views of such structures and Montpellier Hill in the form of street vistas and panoramic views across open spaces.</p>	<p>The submitted EIAR includes a landscape and visual impact assessment (Chapter 15 – The Landscape) and associated photomontages are also enclosed which illustrate how sensitively the proposed development has been designed to assimilate into its receiving environs, and which assesses the visual impacts of the proposed development on the relevant views.</p>
<p>Objective GI30: Development along and near the southern boundary of the Plan Lands shall include for a continuous and linked green buffer to the Dublin Mountains. This buffer shall include for the planting of woodlands where the buffer widens and the preservation and integration of existing hedgerows and streams. Narrowed areas of this buffer shall be no less than 15 metres in width.</p>	<p>It is evident from the proposed building height strategy and the protection of visual links to the south towards the mountains that careful consideration has been paid to the overall design of the scheme such that visual connections to the mountains is retained.</p> <p>No buildings above the 120m contour are proposed, with open space provided and</p>



	hedgerows retained along the southern boundary of the subject site.
<p>Objective GI31: Development along and near the boundary with the M50 motorway shall include a green corridor and wetland area that will mitigate against noise through the planting of semi-mature trees and incorporation of soft landscaped mounding/berms. Narrowed areas of this buffer shall be no less than 20 metres in width. All planning applications for development in close proximity to the M50 should be accompanied by a report, prepared by a qualified person, detailing noise levels and mitigating measures for noise.</p>	<p>The proposed development is located on the western side of the Plan Lands and is not considered to be located near the M50 boundary in the context of the designated Plan Lands. This objective is therefore not considered to be applicable to the proposed development.</p>
<p>Objective GI32: All residential development shall contribute to the creation of the planned network and hierarchy of open spaces.</p>	<p>The proposed development includes the appropriate provision of public open space, including the delivery of “Oldcourt Park”, which is dispersed throughout the proposed layout to ensure a connected, permeable, network of open spaces. Landscaping details for the proposed development and rationale for same have been prepared by Gannon + Associates and we refer the reader to same for details.</p>
<p>Objective GI33: Public open space shall be provided at a minimum rate of 20% of development sites on the Lower Slope and Mid Slope Lands and 30% on the Upper Slope Lands. With the exception of lands located within the wayleave of 110kV and 220 kV overhead transmission lines, only public open spaces that fall within the hierarchy of spaces and functions detailed in Table 5.3 (Section 5.2) shall be included in the calculation of public open space.</p>	<p>The proposed development caters for approximately 73,754.8sq.m (7.37 hectares) of public open space, which equates to c.36% of the application site area.</p>
<p>Objective GI34: Neighbourhood Parks shall be designed to operate as passive and active amenity spaces with extensive SUDS attenuating and storage features (ponds, basins, reed beds etc) that will act as landscape features and link with an overall SUDS network for the Plan Lands.</p>	<p>The proposed landscape design provides for the delivery of “Oldcourt Park” which will be the central neighbourhood park for the western part of the Plan lands. In addition, other parks of varying size and function are proposed, which incorporate the proposed SuDS features. Refer to the submitted landscaping drawings and landscape design rationale prepared by Gannon & Associates for details.</p>
<p>Objective GI35: Residual, narrow and incidental areas of open space with no role or function shall not be included in the calculation of open space provision.</p>	<p>The proposed development includes for a public open space provision which equates to c.36% of the overall site area. Incidental areas of public open space, with</p>



	no role or function, have been minimised in the proposed layout and are not included in the public open space calculations.
Objective GI36: Play facilities shall be provided at a rate of 3 sq.m per dwelling and in accordance with <i>Planning Guidance on Provision of Children's Play Facilities in New Developments</i> (2007) and the Standards section of this LAP (Appendix 2).	A total of 3,206sq.m of play space is provided which is excess of the minimum 3sq.m per dwelling required.
Land Use and Density Strategy Objectives	Proposed Development Compliance
Objective LUD1: The density of development shall accord with that indicated under Table 5.4 and Figure 5.3 of this Local Area Plan (Section 5.4). The extent and density of development indicated for Options A and B on Figure 5.3 shall only be permissible where development is generally carried out in accordance with this LAP and, in the case of Option A, existing 220kV overhead electrical transmission lines are rerouted to coincide with the wayleaves of existing watermains.	The proposed density has had regard to the recently published Sustainable Residential Development & Compact Settlement Guidelines, 2024, as well as the topography and locational context of the site. The overall net density of the development is c.42 units per hectare. The proposed site layout plan is not affected by the overhead electricity wires.
Objective LUD2: The density of development permissible on sites that are subject to extant permissions should be amended in accordance with this Local Area Plan. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this Local Area Plan's Density Strategy.	There is no extant permission attached to the subject application site and therefore this objective of the LAP does not apply to the proposed development.
Objective LUD3: The permissible dwelling mix shall yield a minimum of 90% or more houses. Apartment and duplex units are not permissible on the Upper Slopes of the Plan Lands. Extensions of duration of permission should only be granted where development granted prior to the adoption of this Plan accords with this objective.	The proposed development provides for 523 no. dwellings comprised of 255 no. houses (c.49%) and 270 no. apartment and duplex units (c.51%). Apartments and duplex units are situated within the proposed development so as to not be located on the upper slope lands.
Objective LUD4: A mix of house types and quality designs that will help aid legibility and way-finding is encouraged across the Plan Lands.	The proposed development provides for a wide variety of house types and neighbourhood character areas/zones, each designed to a high-quality standard. The proposed housing layout is centred upon the main east-west link street running through the Plan Lands and the proposed Green Infrastructure network, including Oldcourt Park, thereby ensuring a legible, permeable, layout for both future residents and visitors, whether travelling by foot, bicycle or vehicle.



<p>Objective LUD5: Residential development within the Lower Slope Lands shall consist of medium to low density (32 – 38 dwellings per Ha./13 – 15 per acre) terraced and semi-detached housing. New development adjacent to existing housing shall be designed sensitively to protect existing residential amenity.</p>	<p>The proposed development is primarily located on the mid slope lands, with southern parts located on the upper slope lands and a small portion of the development located on the lower slope lands. The proposed development has therefore sought to provide an appropriate density which balances the range of densities required on each land type i.e., upper, mid and lower slope lands. The proposed density is based upon the requirements of the 2024 Sustainable Residential Developments & Compact Settlements Guidelines which require net densities of 40 – 80 units per hectare to be provided on a site such as this. Furthermore, the SDCC LRD opinion (Ref. LRDOP001/24) states that “the applicant should revise the scheme to provide for a minimum density of 40 dph, in accordance with the Compact Settlement Guidelines. This will likely involve the reconsideration of block layouts and unit types proposed. The Planning Authority is open to proposals for new types of dwelling units provided for to the Compact Settlement Guidelines”.</p> <p>Taking the above into account, the proposed density has had regard to the recently published Sustainable Residential Development & Compact Settlement Guidelines, 2024, as well as the topography and locational context of the site. The overall net density of the development is c.42 units per hectare.</p>
<p>Objective LUD6: Residential development within the Mid Slope Lands shall consist of low density (22 – 28 dwellings per Ha./9 – 11 per acre) development comprising semi-detached and terraced housing of no more than 2 storeys. Additional split level floors may be acceptable where they are justified on the basis of topography, are sensitively incorporated into the slope of the lands and do not increase the height of dwellings from street level to more than 2 storeys.</p>	
<p>Objective LUD7: Residential development within the Upper Slope Lands shall consist of very low density (12 – 18 dwellings per Ha./5 – 7 per acre) development comprising single storey detached and semi-detached housing. Additional split level floors may be acceptable where they are justified on the basis of topography, are sensitively incorporated into the slope of the lands and do not increase the height of dwellings to more than 1 storey from street level and by no more than 2 storeys from the side and rear. Dormer window structures shall only be permissible for single storey dwellings and must be within the structure of the main roof, below its ridge level and above its eaves line (at least approx. 3 tile courses). Densities adjacent to the green buffer along the southern fringe should be provided at the lower end of the scale (approx. 12 dwellings per hectare).</p>	
<p>Objective LUD8: All residential development shall provide community floorspace at a rate of 3 sq.m per 10 dwellings (excluding childcare floorspace). Such floorspace shall be grouped in community facilities and shall be located close to or within local shopping facilities/centres within the Plan Lands.</p>	



	<p>"Floorspace on the western side shall be co-located with the permitted discount foodstore". The permitted discount foodstore is located outside of the subject application site. In consideration of the above it is the applicant's intention to agree a financial contribution with the Planning Authority in support of the development of off-site community floorspace at a rate which complies with Objective LUD8 of the LAP. Please refer to section 7.14.2 of the submitted Planning Statement for details regarding this matter.</p>
<p>Objective LUD9: The primary locations for community floorspace shall include the Discount Foodstore site zoned Objective 'LC' on the western side of the Plan Lands and the site of the previously permitted Neighbourhood/Community Centre (Reg. Ref. SD05A/1014) on the eastern side.</p>	<p>The noted locations in this objective are situated outside the application site area and, therefore, the proposed development is compliant with this objective.</p>
<p>Objective LUD10: All service and retail developments shall comply with the <i>Retail Planning Guidelines for Planning Authorities</i> (2012) and the accompanying <i>Retail Design Manual</i> (2012) particularly in terms of scale, location and design. Such development shall comply with the Design Manual's Key Principles on Urban Design and the standards set out in Appendix 2 of this LAP.</p>	<p>The proposed development does not include for any service or retail development and, therefore, this objective is not applicable to the proposed development.</p>
<p>Objective LUD11: Planning applications for 100 or more dwellings shall be accompanied by a report identifying the demand for school places likely to be generated by the proposal and the capacity of schools in the vicinity to cater for such demand.</p>	<p>This objective of the LAP is noted and a School Needs Assessment has been carried out as part of the submitted Social Infrastructure Assessment (SIA) - please refer to same.</p>
<p>Objective LUD12: Each of the two primary school sites designated under this LAP shall measure at least 1.8 hectares and shall each be set aside for the development of a primary school. The Post-Primary School, if provided, shall comply with the minimum space requirements of the Dept. of Education and Skills. Further to a Material Alteration of the Local Area Plan, the Oldcourt/Gunny Hill School Site designated under this Plan has been increased by 1.2 acres to allow for two primary schools (a third school on the Plan Lands) at this location. See Figure 5.3 (Land Use and</p>	<p>The primary school sites are located outside of the application site area and are being delivered/have been delivered by others and, therefore, this objective is not applicable to the proposed development. Details of same are set out in the enclosed SIA.</p>



Density Framework Strategy) for proposed additional school site.	
Objective LUD13: All school and childcare development on the Plan Lands shall include for safe queuing and drop-off facilities for vehicles, which should be located to the side of buildings to allow for good street frontage.	The proposed development does not include a school but does include a childcare facility. The proposed childcare facility has been located within the proposed layout to ensure for safe queuing and drop-off facilities for vehicles, and good street frontage.
<u>Built Form & Design Objectives</u>	<u>Proposed Development Compliance</u>
Objective BF1: Development shall be arranged into a series of perimeter blocks that present strong building frontages to surrounding streets especially at street corners with rear gardens enclosed within each residential block to the rear and parking/service areas enclosed to the side and/or rear of commercial, community and school developments. Rear gardens, blank facades and service areas shall not interface with any streets or spaces.	The proposed development provides for a wide variety of house types arranged into a number of perimeter blocks / neighbourhood zones / character areas, each designed to a high-quality standard. Details of same are set out in the enclosed Architectural Design Statement. Each neighbourhood area presents a strong frontage to surrounding streets, save for on the upper slope lands where set backs are incorporated via in-curtilage parking / front gardens. Proposed housing plots are designed to enclose rear gardens behind the building line to minimise blank facades/gable walls interfacing streets / open spaces.
Objective BF2: Block lengths within the Lower Slope Lands should be no more than 80 metres. Plot widths for dwellings in this area should vary between 5 metres and 9 metres and dwellings depths should be no more than 10 metres.	The proposed development has been designed to ensure block lengths comply with this objective, as appropriate.
Objective BF3: Block lengths within the Mid Slope Lands should be no more than 100 metres and no more than 120 metres within the Upper Slope Lands.	The proposed development has been designed to ensure block lengths comply with this objective, as applicable. each land type i.e., upper and mid slope lands.
Objective BF4: For commercial/local shopping developments, building depths should be no more than 20 metres and plots that are wider than 9 metres shall be vertically articulated with multiple entrances, good shopfront design and division. Perimeter shop units should be arranged to avoid long monotonous street frontages.	The proposed development does not include for commercial/local shopping development and, therefore, this objective is not applicable to the proposed development.
Objective BF5: All development including streets, buildings and spaces shall be laid out to comply with South Dublin County Council Development Plan policy on steep sites and shall be designed to circumvent	The proposed development has been designed with careful consideration of the undulating topography of the subject site to ensure the need for retaining walls and



<p>the need for retaining walls and significant alterations to topography such as the cutting and filling of platforms in the landscape.</p>	<p>significant alterations to topography is minimised, as much as feasibly possible.</p>
<p>Objective BF6: Residential development within the Lower Slope Lands and all community, retail and school development shall present strong building frontages located close to street edges with a fine urban grain and on-street parking. Dwellings within the Mid Slope lands shall have a mixture of strong and set-back built frontages with on-street and in-curtilage parking. Dwellings on the Upper Slopes shall have softer frontages set back from the street edge behind planted front gardens that incorporate in-curtilage parking.</p>	<p>The proposed development is primarily located on the mid slope lands, with southern parts located on the upper slope lands. The proposed layout has been designed to ensure dwellings on the upper slope lands have softer frontages set back from the street edge by in-curtilage parking and front gardens. Dwellings on the mid slope lands have been designed to utilise parallel and perpendicular on-street parking to provide a mixture of strong and set back built frontages, as appropriate.</p>
<p>Objective BF7: Views of the Dublin Mountains (including Montpelier Hill and the Bohernabreena Valley) and historic buildings and monuments (including the Hell Fire Club, Carthy's Castle, Orlagh College and Woodtown Manor) shall be enhanced and preserved by development as much as possible. This should be achieved through the carefully considered and sensitive arrangement of streets, spaces and buildings in a manner that preserves and creates vistas and views of these landmark and landscape elements.</p>	<p>The design and layout of the proposed development and the proposed building typologies have been carefully considered to ensure vistas and views of these landmark / landscape are preserved and created. CGI visuals have been prepared by Davey+Smith Architects and are submitted with this application.</p> <p>The enclosed EIAR contains Chapter 15 – The Landscape, which is a Landscape Visual Impact Assessment (LVIA) prepared by Macroworks, and accompanying photomontages / verified views are also enclosed – please refer to same.</p>
<p>Objective BF8: Development shall be no more than one storey at street level on the Upper Slope Lands, no more than two storeys at street level on the Mid Slope Lands and no more than three storeys on the Lower Slope Lands. New dwellings backing onto or adjacent to existing single storey dwellings should be no more than two storeys.</p>	<p>The proposed site layout plan and design of the various buildings / dwelling typologies have paid careful consideration to the topography of the site, and as set out in the preceding sections of this Statement, namely sections 5.1, 5.2 and 5.3, the proposed development accords with national planning policy regarding building height, apartments standards and density requirements respectively, all of which supersede the LAP, but accord with the County Development Plan.</p>
<p>Objective BF9: A variety of dwelling designs shall be incorporated throughout the Plan Lands and particularly within individual developments of more than 5 dwellings subject to the use of a limited palette of materials. Dwellings on corners shall be</p>	<p>The proposed development provides for a wide variety of housing typologies and neighbourhood zones / character areas, each designed to a high-quality standard. A complementary palette of material finishes are proposed, with further amendment possible by way of agreement</p>



<p>designed to overlook and address streets and spaces.</p>	<p>with the Planning Authority post receipt of a grant of permission. Corner dwellings have been designed to provide for dual frontage to ensure adjacent streets and spaces are appropriately addressed and overlooked.</p>
<p>Objective BF10: All streets are designed in accordance with the street hierarchy and design speeds set out in the Accessibility and Movement Strategy of this Plan (Section 5.2) together with the street design requirements set out in the <i>DMURS</i> including those that relate to movement, place and speed; streetscape; pedestrian and cyclist environment; and carriageway conditions.</p>	<p>The proposed street network has been designed in accordance with the principle of the Design Manual for Urban Roads and Streets, 2019, (<i>DMURS</i>) to ensure efficient and safe movement, together with appropriate place and speed; streetscape; pedestrian and cyclist environment; and carriageway conditions. This is affirmed by the enclosed <i>DMURS</i> Statement of Compliance prepared by Pinnacle Consulting Engineers – please refer to same.</p>
<p>Objective BF11: The width of vehicular carriageways and footpaths shall comply with Table 5.6 (Section 5.5) and shall relate to the appropriate design speed, user needs, context and function of each street.</p>	<p>The proposed street network has been designed in accordance with the principle of the Design Manual for Urban Roads and Streets, 2019, (<i>DMURS</i>) to ensure appropriate street / footpath widths, design speeds and function. This is affirmed by the enclosed <i>DMURS</i> Statement of Compliance prepared by Pinnacle Consulting Engineers – please refer to same.</p>
<p>Objective BF12: Wide pedestrian paths and crossings together with carefully considered cycle lanes/tracks shall be integrated into the design of all streets with the exception of fully integrated shared surface streets. Vehicular crossovers shall be designed to clearly indicate that pedestrians and cyclists have priority over vehicles.</p>	<p>The submitted traffic and transport details prepared by Pinnacle Consulting Engineers have been prepared/designed in accordance with the principles of the Design Manual for Urban Roads and Streets, 2019, (<i>DMURS</i>) to ensure that pedestrian / cyclist priority is given at vehicular crossing points through the use of signalised junctions, tactile paving and differing surface materials. The layout incorporates off street pedestrian paths and cycleways to further ensure prioritisation and safe movement of pedestrians / cyclists. Shared surface streets are proposed within the development where appropriate.</p>
<p>Objective BF13: Transition zones and gateways shall also be utilised to slow vehicles entering the Plan Lands from rural roads including at the western end of the planned Main Link Road with the Bohernabreena Road. These transition zones</p>	<p>Road construction details for the proposed development have been prepared by Pinnacle Consulting Engineers – please refer to their enclosed drawings and reports for details.</p>



<p>and gateways should include for narrowed carriageways, enclosure with street trees and changes to carriageway surface materials.</p>	
<p>Objective BF14: All development should comply with <i>Quality Housing for Sustainable Communities</i> (2007) and <i>Sustainable Residential Development in Urban Areas</i> (2009) with regards to sustainability, energy efficiency and orientation of development.</p>	<p>The proposed development has been designed with reference to principles stated in the named documents, and the relevant documents that now supersede them. The proposed dwellings will be constructed to the most up-to-date Building Regulations standards to ensure maximum energy efficiency and sustainability. A Building Life Cycle Report for the apartment and duplex units, detailing measures considered to effectively manage and reduce costs for the benefit of residents, is submitted as part of this LRD planning application. All dwellings and private amenity spaces have been orientated within the proposed layout to maximise receipt of sunlight/daylight.</p>
<p>Objective BF15: New housing schemes should be designed in accordance with passive solar design principles as set out under the <i>Urban Design Manual</i> (2009) and the Standards Section of this LAP (Appendix 2). The orientation of dwellings and internal layouts should therefore be arranged to maximise solar gain but in a balanced manner that does not significantly impact on the topography of the Plan Lands, conflict with Sustainable Urban Drainage Systems or significantly impinge on the successful creation of streetscapes in terms of good street frontage and passive surveillance.</p>	<p>All dwellings, including their internal layouts, and private amenity spaces have been designed and orientated to maximise receipt of sunlight/daylight in accordance with passive solar design principles. The proposed layout is designed to ensure passive surveillance from dwellings onto proposed streets and open spaces, provide for good street frontage, and take into consideration the topography of the Plan Lands and the location of proposed SUDS features.</p>

Table 17: Consistency with the Ballycullen-Oldcourt LAP Objectives.

In addition to all the foregoing, Appendix 1 of the LAP also details more site specific policies that relate to strategic sites within the Plan Lands. Table 25 below details the site specific objectives of the LAP which are considered relevant to the proposed development, along with the proposed development's compliance with same.



Oldcourt School Site & Replacement Playing Pitches – Gunny Hill	Proposed Development Compliance
<p>Objective SSP14: No residential development shall commence on the lands that accommodate the GAA playing pitches off the Oldcourt Road, until such time as a site for replacement playing pitches have been provided on the Plan Lands. The 'Objective B' zoned lands to the south-east (between Gunny Hill and Oldcourt Lane) are designated under this LAP for such a facility, which should be shared with the adjacent designated school site. Floodlighting may be permissible subject to submission of Bat Surveys, retention and augmentation of hedgerows and provision of specialist lighting limits any impacts on bat species. Mitigating measures shall be sufficiently demonstrated and detailed at planning application stage.</p>	<p>Permission for the playing pitch, located between Oldcourt Lane and Gunny Hill, including access, was granted under Planning Ref. SD16A/0059 / PL06S.247693. The playing pitch is located to the east of the subject lands (south of the Ballycullen Green development) and is currently in use having been delivered by the applicant and, therefore, the proposed development is compliant with this objective.</p>
<p>Objective SSP15: A primary school and/or post primary school site of at least 1.8 hectares shall also be reserved on the 'Objective B' zoned lands located within the Plan Lands between Gunny Hill and Oldcourt Lane. Further to a Material Alteration of the Local Area Plan, the site has been increased by 1.2 acres to allow for two primary schools at this location.</p>	<p>Permission for a temporary two storey post-primary school (Firhouse Educate Together Secondary School) was granted under Planning Ref. SD21A/0137 / ABP-311141-21. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref. SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School and is considered to be compliant with this objective of the LAP.</p>
<p>Objective SSP16: Playing pitches and any open green spaces developed as part of the primary school site and/or post-primary school site shall link with and integrate with the open space and sustainable urban drainage network detailed under the Green Infrastructure Strategy (Section 5.3).</p>	<p>This is noted and not relevant to the subject site.</p>
<p>Objective SSP17: Surface water on the primary school site and/or post-primary school site shall be intercepted by on-site SUDS features (i.e. green roofs, rainwater harvesters, soakaways and porous grass paviors for parking) and any run-off shall</p>	

<p>be discharged to the SUDS network envisaged for the Plan Lands.</p>	<p>These objectives (i.e. SSP17, SSP18 & SSP19) are noted and not relevant to the subject site.</p>
<p>Objective SSP18: Pedestrian and cyclist access to any primary and/or post-primary school development shall link with the pedestrian and cycle network detailed under the Accessibility & Movement Strategy (Section 5.2). Vehicular access shall be designed to include safe queuing and drop-off facilities.</p>	
<p>Objective SSP19: The triangular field and its hedgerow boundaries located at the south-west corner of the planned Gunny Hill playing pitches shall be retained as a buffer between the Oldcourt Lane and the planned sports pitches and school as a biodiversity feature.</p>	
<p><u>ESB Wayleave Wetland & Oldcourt Park</u></p>	
<p>Objective SSP24: Correspond with and follow the diverted (Option A) or existing (Option B) route of the overhead electrical 220kV transmission lines. This wetland area shall be designed to intercept and attenuate surface water emanating from the three drainage ditch systems to the south in addition to any surface water generated from new development for slow release to the surface water sewerage system downstream of the Plan Lands.</p>	<p>The proposed “Oldcourt Park” and open space network incorporates SuDS proposals, whereby the proposed landscape design and engineering proposals have been carefully integrated.</p>
<p>Objective SSP25: Retain the existing historic granite gate piers and granite culvert at its western end (eastern side of existing small triangular field – see Photo 3.1 in Section 3) as local features for incorporation into the network of spaces and tracks and trails for the Plan Lands.</p>	<p>This is noted and is being retained – please refer to section 6.2.3 (page 66) of the submitted Landscape Design Rationale prepared by Gannon & Associates, Landscape Architects for details of same.</p>
<p>Objective SSP26: Incorporate tracks and trails that will link the Wetland Area to other open spaces including the planned Oldcourt Park to the east, the Green Corridor and Dublin Mountains to the south and the Oldcourt Stream and tributaries to the north.</p>	<p>The proposed landscape design provides for a series of walking and running tracks throughout the development, which may also connect with adjoining lands.</p>

Table 18: Consistency with the Ballycullen-Oldcourt LAP Objectives.



Section 6 of the LAP details the Phasing Strategy for the Plan Lands. For the purposes of the Phasing Strategy, the Plan Lands are divided into the eastern and western sides using the Ballycullen Road as the point of division. The proposed development is located on the western side of the Plan Lands. The strategy for the western side of the Plan Lands is comprised of four phases which specify the quantum of residential development and key pieces of infrastructure that must be provided prior to the next phase of development. Tables 26 & 27 on the following pages detail the phasing requirements of the four phases of development for the western side of the Plan Lands i.e. the requirements of Table 6.3.2 "Western Side of Plan Lands" of the LAP. The proposed development's compliance with the phasing requirements is also detailed.

Phase 1 – 150 dwellings i.e., Option B (retention of existing 220 kV lines)	
Key Outcomes Required before Next Phase	Proposed Development Compliance
1. Commencement of works on Gunny Hill playing pitches including access.	Permission for the playing pitch, located between Oldcourt Lane and Gunny Hill, including access, was granted under Planning Ref. SD16A/0059 / PL06S.247693. The playing pitch is located to the east of the subject lands (south of the Ballycullen Green development), is currently in use having been delivered by the applicant and is therefore considered to be compliant with this Phase 1 requirement.
2. 1 x NEAP on western side of Plan Lands.	The proposed development includes for the delivery of Oldcourt Park and the delivery of the NEAP. Landscaping and play equipment details for the proposed development have been prepared by Gannon + Associates and we refer the reader to same for details. The proposed development is therefore considered to be compliant with this Phase 1 requirement.
3. Site made available for the construction of a Primary School on the eastern side of the Plan Lands or a Primary School and/or Post-Primary School on the western side of the Plan Lands.	Permission for a temporary two storey post-primary school (Firhouse Educate Together Secondary School) was granted under Planning Ref. SD21A/0137 / ABP-311141-21. In addition, permission for a new educational campus was granted on 29 th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref. SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School) and is considered to be compliant with this Phase 1 requirement.



<p>4.</p>	<p>Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.</p>	<p>The conditions attached to the various permissions granted to date on the Plan Lands are being adhered to and include for the appropriate road improvements and traffic requirements as per the LAP strategies for related plans, guidelines, and studies. The proposed development is also being delivered in accordance with the LAP Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies, as previously detailed in this Statement. The proposed development is therefore considered to be compliant with this Phase 1 requirement.</p>
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Table 19: Consistency with the Ballycullen-Oldcourt LAP Phasing Objectives.

<p>Phase 2 – 220 dwellings i.e., Option B (retention of existing 220 kV lines)</p>	
<p>Key Outcomes Required before Next Phas</p>	<p>Proposed Development Compliance</p>
<p>1. Completion of Gunny Hill playing pitches including access.</p>	<p>Permission for the playing pitch, located between Oldcourt Lane and Gunny Hill, including access, was granted under Planning Ref. SD16A/0059 / PL06S.247693. The playing pitch is located to the east of the subject lands (south of the Ballycullen Green development), is currently in use having been delivered by the applicant and is therefore considered to be compliant with this Phase 1 requirement.</p>
<p>2. Site made available for the construction of a Primary School on the eastern side of the Plan Lands or a Primary School and/or Post-Primary School on the western side of the Plan Lands.</p>	<p>Permission for a temporary two storey post-primary school (Firhouse Educate Together Secondary School) was granted under Planning Ref. SD21A/0137 / ABP-311141-21. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref. SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School) and is considered to be compliant with this Phase 2 requirement.</p>
<p>3. Commencement of landscaping of Oldcourt Park with access and 1 additional NEAP for western side of Plan Lands.</p>	<p>The proposed development includes for the delivery of Oldcourt Park and the delivery of the NEAP. Landscaping and play equipment details for the proposed development have been prepared by Gannon + Associates and</p>



		we refer the reader to same for details. The proposed development is therefore considered to be compliant with this Phase 2 requirement.
4.	The provision of a minimum of 300 sq.m of community floorspace.	It is noted this phasing requirement of the LAP contains a footnote in relation to community floorspace which states: “ <i>Floorspace on the western side shall be co-located with the permitted discount foodstore</i> ”. The permitted discount foodstore is located outside of the subject application site. Furthermore, based upon discussions between the design team and the Planning Authority, it is understood the preference of the Planning Authority is to provide an extension to existing local community centres thus negating the need to provide an additional facility on the western side of the Plan Lands. Further details regarding this matter are set out in section 7.14 of the submitted Planning Statement – please refer to same. The proposed development is therefore considered to be compliant with this Phase 2 requirement.
5.	Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.	The conditions attached to the various permissions granted to date on the Plan Lands are being adhered to and include for the appropriate road improvements and traffic requirements as per the LAP strategies for related plans, guidelines, and studies. The proposed development is also being delivered in accordance with the LAP Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies, as previously detailed in this Statement. The proposed development is therefore considered to be compliant with this Phase 2 requirement.



Phase 3 – 350 dwellings i.e., Option B (retention of existing 220 kV lines)	
Key Outcomes Required before Next Phase	Proposed Development Compliance
1. Completion of Oldcourt Park.	The proposed development includes for the delivery of Oldcourt Park, with the applicant proposing the construction of same as part of Phase 1 of the proposed development and completing it in Phase 2. Landscaping details for the proposed development have been prepared by Gannon + Associates and we refer the reader to same for details. The proposed development is therefore considered to be compliant with this Phase 3 requirement.
2. Commencement of planning process for the provision of a school on the designated Primary School site on the eastern side of the Plan Lands or on the designated Primary School site and/or Post-Primary School site on the western side of the Plan Lands.	Permission for a temporary two storey post-primary school (Firhouse Educate Together Secondary School) was granted under Planning Ref. SD21A/0137 / ABP-311141-21. In addition, permission for a new educational campus was granted on 29 th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref. SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School) and is considered to be compliant with this Phase 3 requirement.
3. Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.	The conditions attached to the various permissions granted to date on the Plan Lands are being adhered to and include for the appropriate road improvements and traffic requirements as per the LAP strategies for related plans, guidelines, and studies. The proposed development is also being delivered in accordance with the LAP Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies, as previously detailed in this Statement. The proposed development is therefore considered to be compliant with this Phase 3 requirement

Phase 4 – Completion of Balance – Approximately 110 dwellings i.e., Option B (retention of existing 220 kV lines)	
Key Outcomes Required before Next Ph	Proposed Development Compliance
<p>1. Commencement of construction of the designated Primary School on the eastern side of the Plan lands and the Primary School and/or Post- Primary School on the western side of the Plan Lands.</p>	<p>Permission for a temporary two storey post-primary school (Firhouse Educate Together Secondary School) was granted under Planning Ref. SD21A/0137 / ABP-311141-21. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref. SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School and is considered to be compliant with this Phase 4 requirement.</p>
<p>2. Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies.</p>	<p>The conditions attached to the various permissions granted to date on the Plan Lands are being adhered to and include for the appropriate road improvements and traffic requirements as per the LAP strategies for related plans, guidelines, and studies. The proposed development is also being delivered in accordance with the LAP Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies, as previously detailed in this Statement. The proposed development is therefore considered to be compliant with this Phase 4 requirement</p>

Table 13: Consistency with the Ballycullen-Oldcourt LAP Phasing Objectives.

Evaluation of Consistency with the Ballycullen-Oldcourt LAP

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 Ballycullen-Oldcourt LAP, 2014 (as extended), and as such, the proposed development ought to be granted permission.



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 Capami Ltd., (the applicant), to accompany this planning application in respect of a proposed Large-Scale Residential Development (LRD) in respect of lands located in the townlands of Bohernabreena, Oldcourt and Killininny, Dublin 24.

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 and Ballycullen – Oldcourt Local Area Plan, 2014 (as extended). The proposed development will result in a very attractive place to live on zoned serviced lands in close proximity to 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 (2018),
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016),
- Housing for All – a New Housing Plan for Ireland (2021),
- Housing Commission Report (2024)
- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Sustainable Residential Development & 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 Sustainability Mobility Policy (2022 – 2025)
- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019)
- The Transport Strategy for the Greater Dublin Area 2016-2035

8.4 At local level, this statement has demonstrated the compliance of the 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,
- Ballycullen – Oldcourt Local Area Plan, 2014.
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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 Bohernabreena and Oldcourt 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 and planned 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.

