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Planning Report

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT FORTFIELD ROAD, TERENURE, DUBLIN 6W

PREPARED BY MCG PLANNING
ON BEHALF OF 1 CELBRIDGE WEST LAND LIMITED

DECEMBER 2024

Contents

1. Introduction

On behalf of the applicant 1 Celbridge West Land Limited, 27 Merrion Square, Dublin 2, this planning report accompanies an LRD application to Dublin City Council under Section 32D of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 for a proposed Large Scale Residential Development ("the Proposed Development") at the site of Fortfield Road, Terenure, Dublin 6W. This is in accordance with the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.

The application has been prepared by a multidisciplinary team on behalf of 1 Celbridge West Land Limited as set out in the table below:

Company Name	Documents/ Drawings Prepared
Urban Agency Architecture	Complete set of drawings
	Community Safety Strategy
	Housing Quality Assessment
	Universal Design Statement
	Architectural Design Statement
	Verified views and visualization
PUNCH Consulting Engineers	Complete set of civil and road drawings
	LRD Opinion Summary Response
	Engineering Planning Report
	Site Specific Flood Risk Assessment
	Residential Travel Plan
	Outline Resource and Waste Management Plan
	Outline Construction Management Plan
	Car and cycle Management Plan
	Traffic and Transport Assessment
	DMURS Compliance Statement
	Existing Pedestrian Bridge Inspection
	Basement Impact Assessment
	Uisce Eireann Confirmation of Feasibility
	Uisce Eireann Statement of Design Acceptance
Bruton Consulting Engineers	Quality Audit
NMP Landscape Architects	Full set of landscape drawings
	Landscape Design Statement
Altemar Ecologists	Appropriate Assessment
	Natura Impact Statement
	Ecological Impact Assessment
	Construction Environmental Management Plan
The Tree File	Complete set of survey and impact/ protection drawings
	Arboricultural Assessment
AWN	Noise Report
	Operational Waste Management Plan
GAA	Building Lifecycle Report
	Operational Management Plan
Moore Group	Cultural Heritage Assessment
	Geophysical Survey Report

OSCS	Climate Action and Energy Statement
	Public Lighting Report
	Site lighting layout
	Wind Microclimate Study
	Daylight, sunlight and overshadowing Assessment
Turleys	Childcare Assessment
	Cultural Infrastructure Impact Assessment
	Social Infrastructure Audit
John Olley	Architectural Heritage Impact Assessment

The report is divided into eight sections:

- Section 2 describes the site location and context.
- Section 3 details the planning history for the subject site
- Section 4 outlines details of the proposed development and rationale
- Section 5 sets out the details of the Pre-Planning meeting
- Section 6 set out of the response to the S32B Pre- Planning meeting and DCC LRD Opinion
- Section 7 assesses the proposed development against national, regional and local planning policy as per the list below:
    - Project Ireland 2040 - National Planning Framework (2018) (“NPF”);
    - Project Ireland 2040: National Development Plan (2018-2027) (“NDP”);
    - Regional Spatial and Economic Strategy 2019- 2031 (“RSES”);
    - Dublin City Development Plan 2022-2028 (“DCDP");
    - South Dublin County Council Development Plan 2022-2028 (“SDCCDP”);
    - Guidelines for Planning Authorities on Urban Development and Building Heights (2018) (“Building Height Guidelines 2018”);
    - Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023) (“Apartment Guidelines 2023”);
    - Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022) (“Apartment Guidelines 2022”);
    - Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2020) (“2020 Apartment Guidelines 2020”);
    - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) (“Sustainable Residential Development in Urban Areas 2009“) (revoked) and the accompanying Urban Design Manual: A Best Practice Guide (2009) (“Urban Design Manual”);
    - Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (“Compact Settlement Guidelines 2024”);
    - Delivering Homes, Sustaining Communities (2007) (“DHSC 2007”);
    - Quality Housing for Sustainable Communities (2007) (“QHSC 2007”);
    - Design Manual for Urban Roads and Streets (2013) (“DMURS”);
    - Guidelines for Planning Authorities on Childcare Facilities (2001) (“Childcare Guidelines 2001”);
    - The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (“Planning System and Flood Risk Guidelines 2009”);

- Site layout planning for daylight and sunlight: a guide to good practice (2022) ("BRE Guide 3rd Edition");
- Rebuilding Ireland – Action Plan For Housing And Homelessness 2016 ("Rebuilding Ireland Plan 2016");
- Transport Strategy for the Greater Dublin Area 2016-2035 ("Dublin Transport Strategy 2016-2035")
- Greater Dublin Area Transport Strategy 2022-2042 ("Dublin Transport Strategy 2022-2042");
- Housing for All – A New Housing Plan for Ireland (2021) ("Housing for All Plan");
- Climate Action Plan (2021) ("CAP 2021").

- Section 8 concludes the report

Development statistics

Development	Site Statistics
Site Area	Gross Site Area: 4.64ha Net Site Area: 2.64 ha (Excludes Z11 area (existing lake) and adjoining landscaped area around the lake (Z15) and small Z1 area at the eastern end of the lake. Net site area also excludes any works on Fortfield Road.)

Unit Mix	284 no. residential units
	• 265 Apartments comprising
	  • 10 (4%) no. studios;
	  • 117 (41%) no. 1 beds;
	  • 129 (45%) no. 2 beds;
	  • 9 (3%) no. 3 beds.
	• 19 Houses
	  • 19 (7%) no. 4 beds.

Residential Amenity Space	301.3sqm
Community/Culture/Arts Space	1,413.6sqm in totality of which 86% or 1,214.6sqm is Indoor Space and 199 sqm is External Space
Creche	100 sqm internal floor area 153 sqm external space Accommodates 17 child spaces
Aspect	63% of all units are at least dual aspect. Of which: 60% of apartment units are dual aspect and 100% of houses are dual aspect or more.
Density	Gross Site Area: 61.2 uph Net Site Area: 107.4 uph
Plot Ratio	Gross ratio: 0.6 Net ratio: 1.06
Site Coverage	Gross Site Area: 17% Net Site Area: 30%
Building Height	Housing: 2-3 storeys Apartments: 3-6 storeys
Public Open Space	Total Public Open Space – 26,131.75 sqm / 2.61 ha (Z15, Z11 and Z1 lands). (This equates to 56% of the Gross Site Area (2.61ha / 4.64 ha)). Public Open Space on Net Site Area (2.64 ha): 6,989.35sqm / 26.5% (6,600 sqm required at 25% for Z15)
Communal Open Space	4,492.22 sqm (1,609sqm required)

Car Parking	165 no. spaces
	- 138 no. apartment and visitor car parking spaces
	  ○ 10 no. of these are car club spaces
	  ○ 9 no. are visitor spaces
	  ○ 7 no. are accessible spaces (This equates to 5% of all spaces)
	- 19 no. housing car parking spaces
	- 4 no. cultural and arts space car parking spaces

	- 1 no. car parking spaces for the creche and - 2 no. creche drop off spaces - 1 Delivery/ service loading bay EV charging infrastructure will be provided for 100% of parking spaces allocated to houses (19 no. EV spaces) and car share (10 no. EV spaces) and for 50% of all spaces serving apartment units (69 no. EV spaces). 100% of spaces proposed will be future proofed for electrical charging.
Cycle Parking	611 no. residential spaces - 465 no. long term spaces - 146 no. short term spaces These include 35 no. cargo / non-standard bicycle parking spaces. All houses will accommodate cycle parking within their curtilage/ gardens. 22 no. non-residential spaces (creche + cultural/arts spaces)
Motorcycle Parking	14 no. spaces provided

2. Site Description and Context

Figure 1: Site Location (Source: Bing Maps 2024)

The proposed development site (c.4.64ha gross) is located to the northwest corner of the grounds of Terenure College Senior school. The main part of the site is an open field that was formerly used as playing pitches associated with the now closed junior school. At the eastern end, the site also includes a lake and woodlands that runs to the south of Terenure College Rugby Football Club grounds. On the south side of the lake is a large area of playing fields also in the ownership of the Terenure College. The subject site and the entire lands are under the Trusteeship of the Carmelite Provence Order and as such is privately owned at present. It is noted that there are no public rights of way across the land.

The site is free from any protected structures or monuments, and it's not located within a Conservation Area of an Architectural Conservation Area. The site is also not within or adjacent to a Special Area of Conservation (SAC) or a Special Protection Area (SPA). There is a recorded monument RMP DU022-095 classified as a castle which is no longer extant, identified in the heart of the existing educational buildings. The castle was replaced by a mansion in the late 17th century and rebuilt again in 1787 and is now the site of Terenure College. The location of the RMP is outside the site for the LRD planning application.

The site, as indicated by the images below, is located in an established residential area, characterised by low-medium density housing mainly two storey in height. There are some small apartment blocks within the vicinity but it is predominantly two storey housing in the area. To the north are the rear gardens of two storey housing on Gleenlea Road. To the east of the site is Lakelands Park, a residential housing estate. The western portion of the site has extensive frontage along the Fortfield Road to the west with the boundary marked by a rendered wall.

Figure 2 Closest residents to the north and east of the site indicating large gardens and predominantly two storey housing

Figure 3 Two storey houses along Greenlea Road

Figure 4 Two storey houses in Lakelands Park

Figure 5 Two storey houses in Greenlea Grove

Figure 6 Two storey houses along Fortfield Road

Figure 7 Two storey houses along College Drive

Figure 8 Low rise apartments at The Mews Fortfield

The site is within a ten-minute walking distance to Templeogue and Terenure Village which provides a range of a services, public transport options, local amenities and employment opportunities. Overall, it is considered that the site is well located, and a highly accessible location well served by public transport, bike and walking facilities providing connection to the employment, commercial, health and education services within the vicinity and wider City.

PUBLIC TRANSPORT

The subject site is highly accessible and is served by 5 bus routes. The bus routes connect the site with numerous places including the City Centre, the Docklands, Dundrum, Tallaght, Citywest.

Form of Transport	Destination	Distance from the Proposed Development & Walking Time.	Weekday Peak Frequency
Bus routes			
54A – Pearse St. towards Ellensborough/Kiltipper Way.		<40m (c. 1 minute)	30 minutes
15 – Clongriffin towards Ballycullen Road.		c.498m (6 minutes)	Every 8-10 minutes
49 – Pearse St. towards Tallaght (The Square)		c.498m (6 minutes)	Every 15 minutes
65 – Blessington/Ballymore towards Poolbeg St.		c.498m (6 minutes)	Every 60 minutes
65B – Poolbeg St. towards City West		c.498m (6 minutes)	Every 60 minutes
15A – Merrion Square towards Limekiln Ave.		1km (12 minutes)	Every 15-20 minutes
74 – Dundrum Luas Station towards Eden Quay		1km (12 minutes)	Every 30 minutes
Go-Ahead S4 bus – Liffey Valley Shopping Centre to UCD		1km (12 minutes)	Every 10 minutes
Proposed Bus Connects Route			
F1 Charlestown – City Centre – Tallaght		c.40m (less than 2 minutes)	Every 10 minutes
A1 Beaumount – City Centre – Knocklyon		c.500m	Every 12 minutes
A3 DCU- City Centre- Tallaght		c.500m	Every12 minutes
Luas			
Cowper Luas Stop – Broombridge to Bridesglen		3.3km (46 minutes)	Every 3 minutes

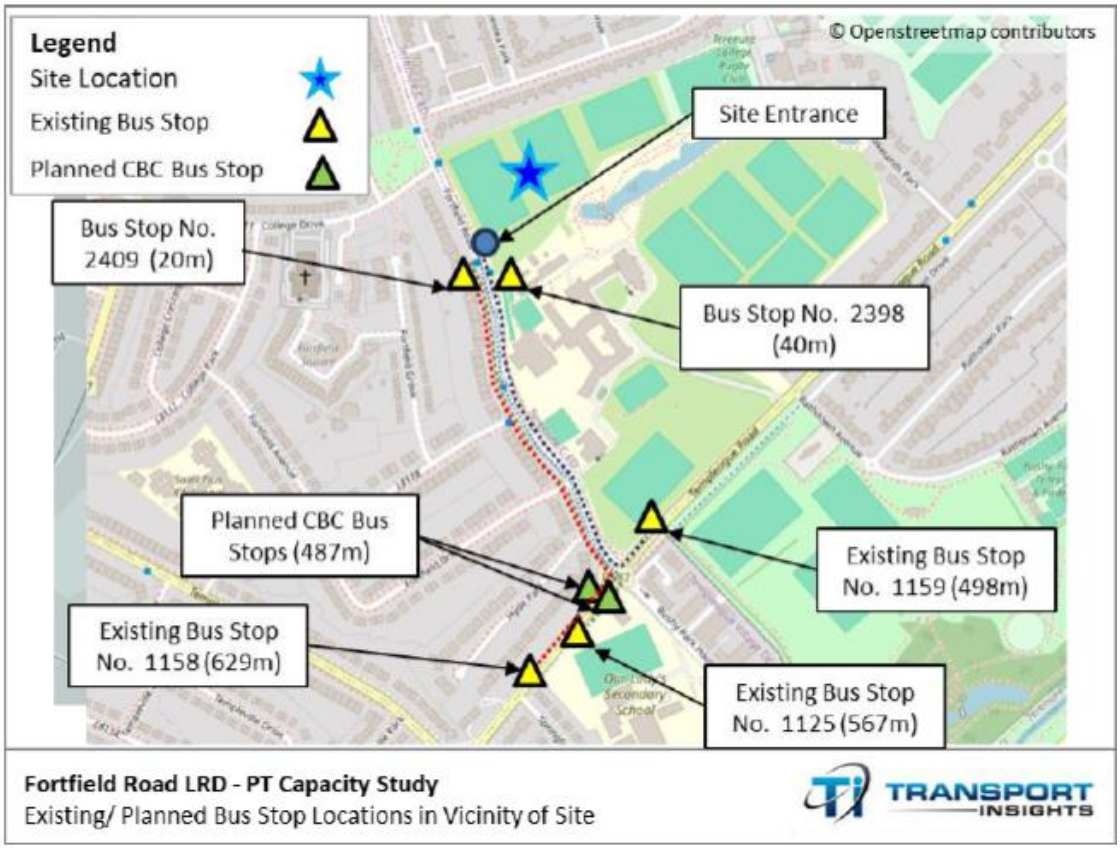
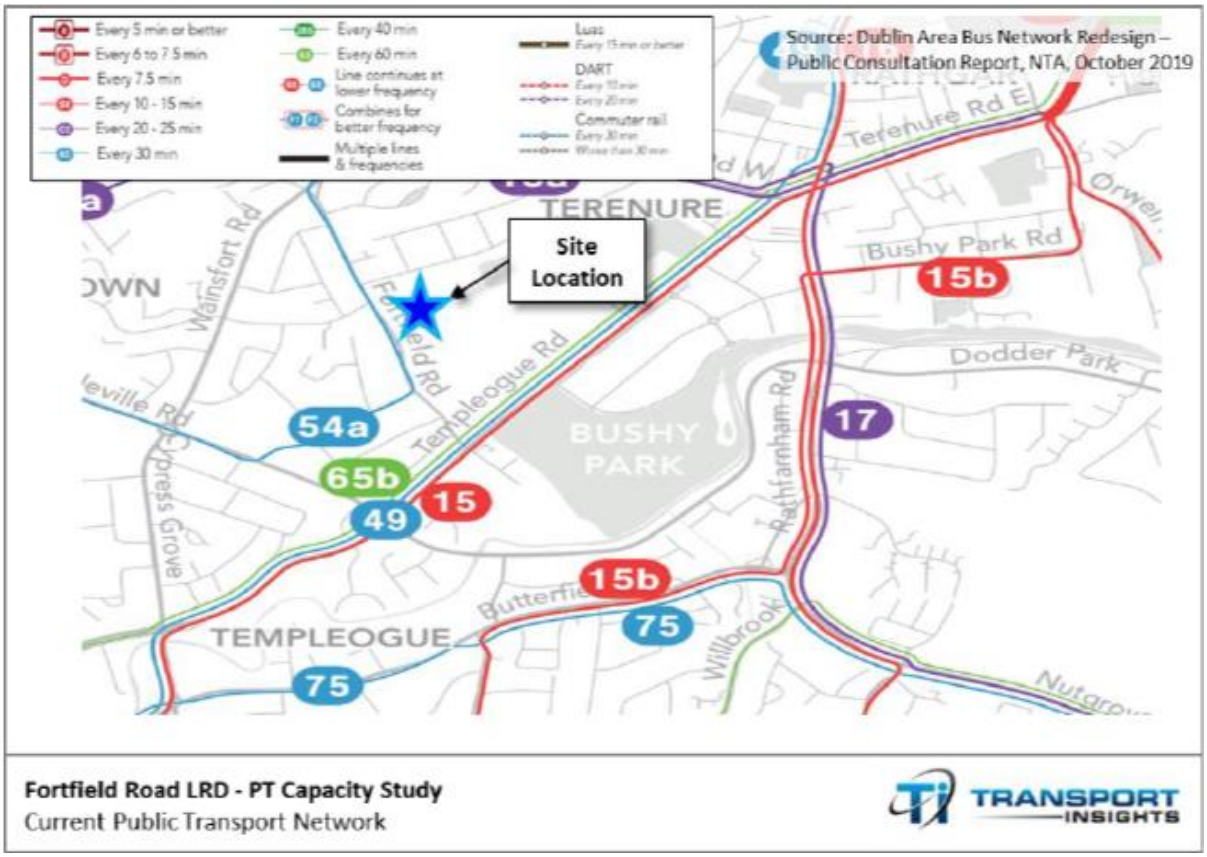
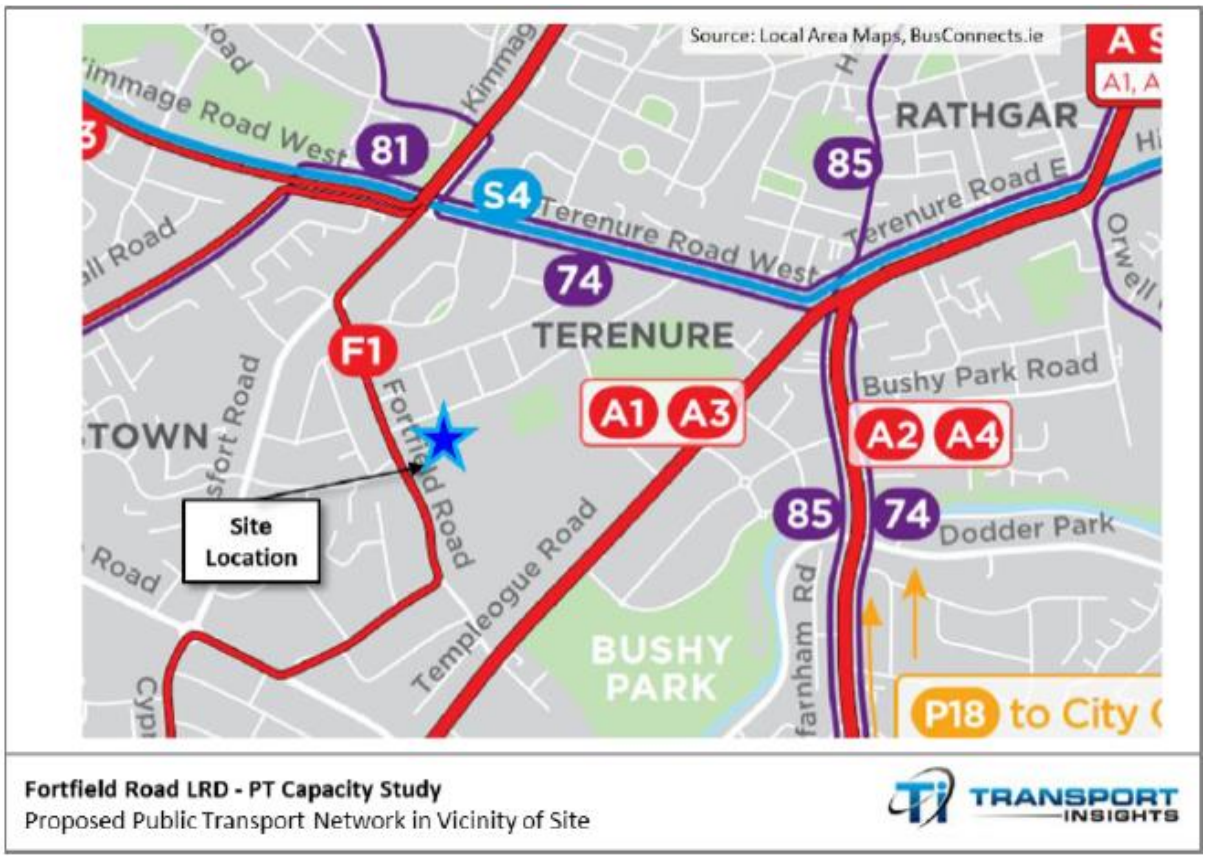


Figure 9: Site Location in relation to Bus Routes



The proposed site has a high frequency bus route, number 15, which runs every ten minutes within 500m of the site. The Public Transport Capacity Study indicates that when all the routes are taken into consideration there is a bus every 4 minutes at a stop within 500m of the site at peak times. The Residential Travel plan prepared by Punch as well as the Public Transport Capacity Study by Transport Insights also show the intention of upgrading the routes in the vicinity as a result of BusConnects. The proposed site is also located adjacent to one of Bus Connects Core Bus Corridor, F1 while the A1 and A3 routes run along Templeogue Road resulting in multiple high frequency bus connections within a short walking distance of the site.



The site is well connected in terms of cycle infrastructure. There are existing cycle lanes running along Templeogue Road to the south of the subject site, and a network of urban cycle routes surrounding the development, separated from the main vehicular lanes.

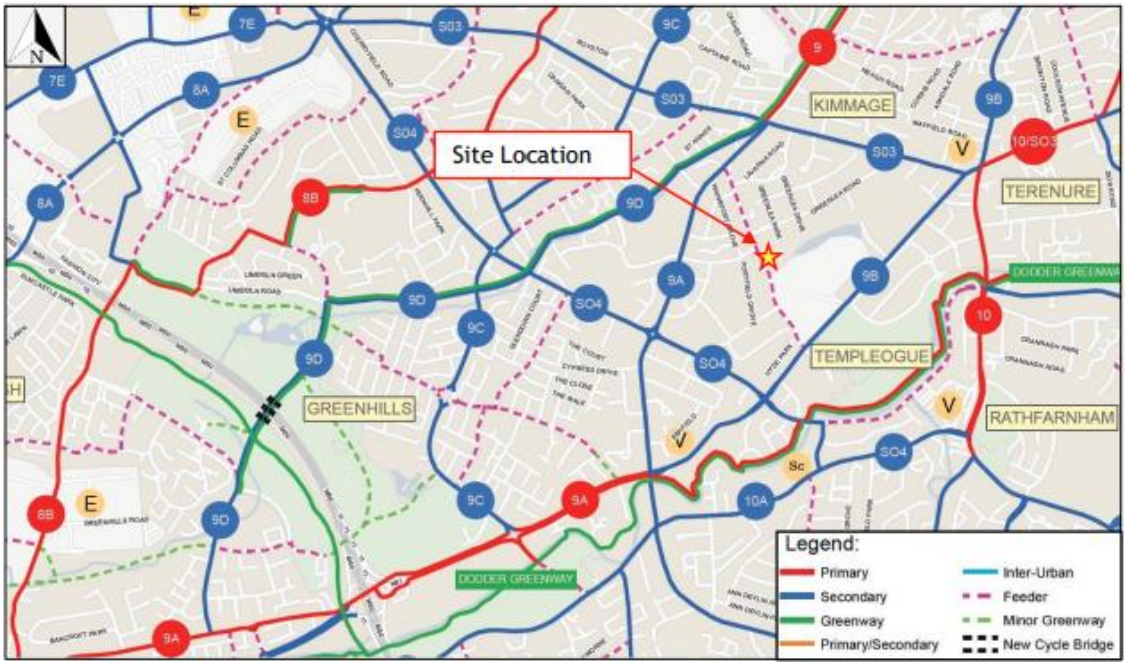


Figure 10 Cycle Paths in relation to the site

RETAIL AND EMPLOYMENT

The subject site is within walking distance of a multitude of services, local amenities and employment opportunities.

- Templeogue Village is c.12-minute walk from the subject site, allowing future residents to benefit from a range of additional services such as restaurants, pubs, take aways, grocery stores and smaller retail outlets.
- Terenure village is located c.13-minute walk from the subject site providing the site with access to commercial hubs with a variety of services including large supermarkets, clothing stores, shops, restaurants, take aways and pubs.
- Rathfarnham Shopping Centre is c.15-minute walk of the site and includes a Tesco Superstore, an EBS Bank, A Dry Cleaners, a Hairdressers, and some smaller retail outlets.
- The Ashleaf Shopping Centre is located to the northwest of the site and is the largest retail facility close to the site. It is a c. 7-minute cycle or 25-minute walk and has a range of shops, takeaways, restaurants, and entertainment services.
- Nutgrove Shopping Centre is located southeast of the site and is a c. 12-minute cycle from the subject site and contains a wider variety of larger supermarkets, clothing stores, pharmacies, restaurants, and entertainment facilities.
- Dundrum Shopping Centre is a 20-minute cycle from the subject site, providing a wide range of shops and is considered a major town centre.

In addition to these centres, which provide an array of employment for the area, there is a number of large employment centres easily accessible to the future residents of the proposed scheme:

Employment Centres	Approx. Cycling Time from Site
KCR Industrial Estate	c. 5 minute cycle
St Lukes Hospital	c.10 minute cycle
Ballymount Industrial Estate	c.15 minute cycle

John F Kennedy Industrial Estate	c.19 minute cycle
Dublin City Centre	c. 20 minute cycle
Trinity College Dublin	c.20 minute cycle
Dublin Docklands	c.24 minute cycle
University College Dublin	c.25 minute cycle
Sandyford Business Park	c.30 minute cycle

PUBLIC PARKS AND RECREATIONAL FACILITIES

A variety of existing leisure amenities exist within 2km of the local area:

Recreational Facilities	Walking distance from Site	Cycling Distance from Site
Terenure College Swimming Pool	6-minute walk	1 minute cycle
Walnut Taverners Cricket Club	8-minute walk	2-minute cycle
Fitsquad Bushy Park	10-minute walk	3-minute cycle
Bushy Park Sports Facilities	10-minute walk	3-minute cycle
Terenure College Rugby Football Club,	10-minute walk (the proposal seeks to reduce this travel time)	3-minute cycle
Sportsworld Terenure Running Club	15-minute walk	4-minute cycle
Templeogue Tennis Club	16-minute walk	4-minute cycle
The Movement Studio Terenure Health and Fitness	16-minute walk	4-minute cycle
Terenure Badminton Centre	20-minute walk	6-minute cycle
Mick Dowling Boxing Condition	20-minute walk	6-minute cycle
Terenure Sports Club	24-minute walk	7-minute cycle

In addition to the public space provided within the scheme, the site is located within 2 km of a range of public parks:

Public Parks	Walking distance from Site	Cycling Distance from Site
Bushy Park	10-minute walk	3-minute cycle
Rathfarnham Castle Playground	21-minute walk	10 minute cycle
Poddle Park	12-minute walk	4-minute cycle
Eaton Square Park	19-minute walk	7 minute cycle
Dodder Walkway Park	20-minute walk	6-minute cycle
Marian Park	23-minute walk	7 minute cycle
Herzog Park	25-minute walk	10 minute cycle
Glenbrook Park	25-minute walk	9 minute cycle
Sunshine Park	20-minute walk	6 minute cycle
Stannaway Park	25-minute walk	6 minute cycle

EDUCATION

There are 11 no. primary schools, 7 no. post-primary schools within 2.5km of the subject site.

Educational Facilities	Walking distance from Site	Cycling Distance from Site

Primary Schools		
St Pius X boys National School	11 minute walk	2 minute cycle
Presentation Primary School	15 minute walk	4 minute cycle
St Joseph's BNS	20 minute walk	6 minute cycle
Harolds Cross Primary School	22 minute walk	7 minute cycle
Bishop Shanahan National School	22 minute walk	8 minute cycle
St Agnes National School	22 minute walk	8 minute cycle
Scoil Una Naofa	22 minute walk	8 minute cycle
St Mary's Boys National School	25 minute walk	9 minute cycle
Rathgar National School	25 minute walk	8 minute cycle
Zion Parish Church	30 minute walk	11 minute cycle
The Good Shepherd National School	34 minute walk	12 minute cycle
Post Primary Schools		
Terenure College	10 minute walk	2 minute cycle
Our Lady's School	10 minute walk	3 minute cycle
Templeogue College	15 minute walk	4 minute cycle
Presentation Community College	15 minute walk	7 minute cycle
Stratford College	25 minute walk	11 minute cycle
The High school	26 minute walk	11 minute cycle
Loreto High School	28 minute walk	11 minute cycle

For more detail on the existing facilities within the surrounding area, please refer to the Social Infrastructure Audit prepared by Turley. The assessment has been carried out to ascertain whether a sufficient social infrastructure exists in the local area to cater for the demand arising from the proposed development. It does so by establishing a study area for the assessment; providing a demographic review of the population, mapping and listing social infrastructure facilities within this area, and providing an assessment of the capacity of social infrastructure to support the existing and future population of the area. The social infrastructure audit has identified a broad range of services and facilities to support the proposed development, including 47 no. social infrastructure facilities within 750m of the site. This provision is considered to be significant, and in line with the subject site's location within the Dublin City area.

3. Planning History

McGill Planning have carried out a desktop review of the planning history of the site. There has only been one relevant planning application on this site, which was for a Large-scale Residential Development, details of which are set out below.

DCC reg.ref.: LRD 6004/22-S3
Application date: 13/06/22
ABP reg.ref.: ABP-314390-22
Final decision date: 02/02/23

Planning permission was refused by Dublin City Council and An Bord Pleanála for the development of A Large-scale Residential Development (LRD) comprising the following:

- a "Build to Rent" (BTR) apartment development providing 364 no. apartments, with balconies or terraces, across 4 no. blocks ranging in height up to 7 storeys over basement, (15 x studios, 166 x 1bed/2p, 174 x 2bed/4p and 9 x 3bed/5p units), including underground parking, communal open space, resident support facilities and resident services & amenities; and (ii) a row of 21 no. 2-3 storey houses (1 x detached and 20 x semi-detached houses), (5 x 2bed/4p and 16 x 4bed/7p units).
- The provision of car, cycle and motorcycle parking spaces, bins storage and plant areas, together with proposed vehicular, pedestrian and cyclist access from Fortfield Road.
- The development also includes an upgrading of junction of Fortfield Road and College Drive to a 4-arm signalised junction; provision of pedestrian/cyclist connectivity to Lakelands Park; new vehicular access from Fortfield Road to a dedicated drop-off / set-down area for deliveries and taxis coinciding with the concierge location; relocation and upgrading of bus stop 2397 on Fortfield Road with the provision of a covered bus shelter, as well as all associated site development works, open spaces, landscaping, boundary treatments and service provisions (including ESB substations). A Natura Impact Statement has been prepared in respect of the application.

The development statistics for the previously refused LRD are as follows:

Development	Site Statistics
Site Area	Gross Site Area: 4.77 ha
Units	385 no. residential units • 364 Apartments • 21 Houses
Unit Mix	**Apartments** - 15 no. Studios - 166 no. 1 beds - 174 no. 2 beds - 9 no. 3 beds **Houses** - 5 no. 2 beds - 16 no. 4 beds
Community Facilities	Residential Support Facilities and Resident Services & Amenities associated with BTR
Aspect	61 % dual aspect
Density	Gross Site Area: 81 uph

	Net Site Area: 146 uph
Plot Ratio	1.3
Site Coverage	31% of developable site area
Building Height	7 Storeys at maximum height (23.7 maximum parapet level)
Public Open Space	8,828 sqm
Communal Open Space	3,419 sqm
Car Parking	160 no. space - 32 no. spaces for houses - 88 no. spaces for apartments at basement - 32 spaces at grade level (for apartments) - 6 no. disabled parking spaces
Cycle Parking	577 no. spaces - 407 long term spaces - 182 short term spaces - 40 bike rental spaces

Dublin City Council Reasons for Refusal

Dublin City Council refused the proposed development on two grounds. These are set out below along with a rational about how the current proposal overcomes them:

1. ***The proposed development by reason of its design and layout, with particular regard to the southern 'servicing' access arrangement, would endanger public safety by reason of traffic hazard due to the creation of vehicular/pedestrian conflict.***

<u>How this is addressed in this application</u>

The current proposal before Dublin City Council will also be assessed by reference to the DCC Development Plan. The proposed development has omitted this southern servicing access arrangement previously proposed. The alterations are indicated in the image below comparing the previously proposed southern access arrangements from Reg. Ref. LRD6004/22-S3 site layout plan to the currently proposed layout with this access omitted.

Figure 11 Site layout to the left as previous proposed, and site layout to the right is the current proposal with access to the south omitted.

All vehicular traffic is now proposed to transit through a single access point off Fortfield Road in this revised layout the subject of this application. The proposed development will include a new vehicular access and the upgrading of the surrounding road network, to create a 4-armed signalised junction. As indicated below, this proposed development includes College Drive, which falls within the South Dublin County Council area and as such is the subject of a separate, concurrent planning application. The proposed junction has been assessed in full and, as demonstrated by the PUNCH Consulting Engineers drawing 222102-PUNCH-XX-XX-DR-C-0460 Proposed Linemarkings – Northern Access and Traffic and Transport Assessment, will not result in a traffic hazard.

Figure 12 Previously proposed junction upgrades and new access to the left. Currently proposed vehicular access and upgrade works to College Drive on the right. The area hatched in green in the subject of a separate, concurrent application with SDCC

2. ***The proposed development by reason of inadequate provision for car parking and internal loading and servicing would result in substantial overspill parking and servicing activity onto the adjoining public road network. The development is considered contrary to the Dublin City Development Section 16.38 and with regard to 'Car Parking' section within the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) has not demonstrated that the location is appropriate for a significant reduction in car parking nor that adequate provision has been provided to support reduced car parking for residents, such as service, delivery, drop-off, and visitors.***

<u>How this is addressed in this application</u>

The current proposal before Dublin City Council is for 284 no. residential units made up of 19 no. houses, all of which have cars parked on their curtilage, and 265 no. apartments which have a combined 138 no. car parking spaces between basement and surface level parking. This equates to a ratio of 1:1 car spaces for houses and 1: 0.52 for apartments, an increase from 1:0.33 for apartments in the previously refused LRD.

Dublin City Development Plan, Appendix 5, Table 2 sets maximum standards for development within zone 2 as 1 space per dwelling. Therefore, this proposed parking is in accordance with the Development Plan. Furthermore, PUNCH Consulting Engineers have included a Residential Travel Plan and a Car and Cycle Parking Management Plan with this application demonstrating that the proposed quantum of parking is appropriate for this location. This Car and Cycle Parking Management Plan will be a live document which will continually manage and assign car parking spaces going forward.

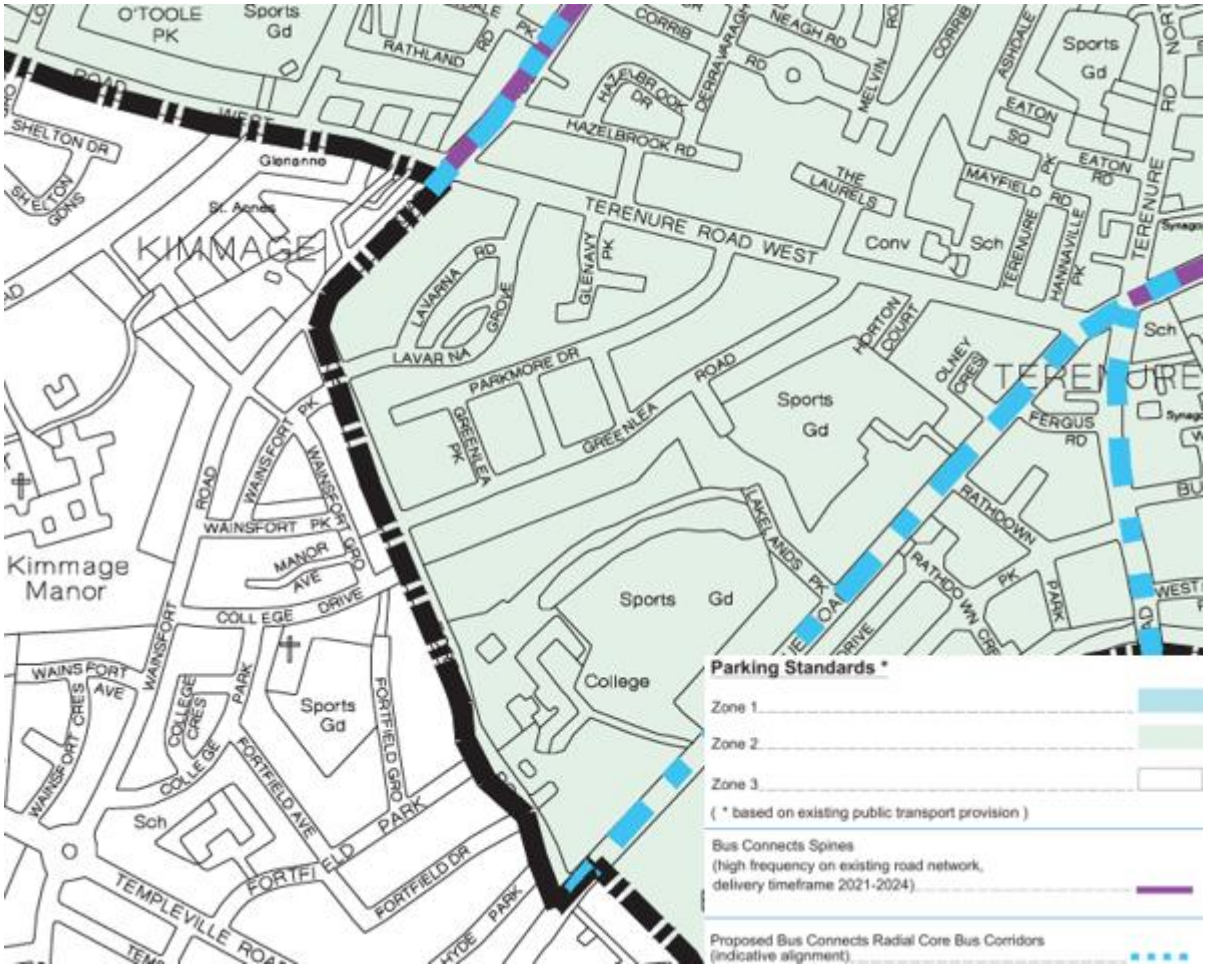


Figure 13 DCC Development Plan Map J indicating parking zones

Furthermore, the level of residential cycle parking proposed has increased to 611 no. cycle parking spaces resulting in an increase in the ratio of cycle parking per apartment (2.3 spaces per apartment) compared to the previous proposal. The 19 no. houses can provide cycle parking on curtilage.

This level of car and cycle parking provision is in line with the Compact Settlement Guidelines 2024. This site is considered to fall under the definition of *City – Urban Neighbourhood* due to its location in a residential area close to the city centre, Templeogue and Terenure, with easy access to high quality public transport and services. It is under 15 minutes' walk to both Terenure and Templeogue Villages which have a host of employment, education, retail and institutional land uses. This is discussed in further detail below within the Statement of Consistency with National Planning Policy.

Should the planning authority determine the site falls more appropriately in the category of *City-Suburban/Urban extension* , the site also comes within the definition of both a *High Capacity Public Transport Node or Interchange* and an *Accessible Location* due to the site's proximity to (within 500m from the site entrance) Bus Stop 1159 which serves bus routes 15, 49, 65 and 65B which all have frequent bus services, and with the 15 running every 10 minutes at peak times.

Please see the Traffic and Transport Assessment by PUNCH Consulting Engineers which confirms that "*The distance from the development's entrance on Fortfield to the planned BusConnects 'Core Bus Corridor' stop on Templeogue Road is <500m (**approx. 498m**) as illustrated by the travel distance measured along the Fortfield Road eastern footpath and pedestrian crossing point at the junction with Templeogue Road.*"

It is also noted that Templeogue Road is part of the BusConnects routes A1 and A3 connecting the site to Beaumount, the City Centre, Knocklyon, DCU and Tallaght and will be further improved. While along Fortfield Road the new route F1 will run every ten minutes and will connect the site to Charlestown, Finglas Bypass, the City Centre and Tallaght. Please see the Public Transport Capacity Study by Transport Insights for further details.

Figure 2.3 Proposed Public Transport Network in Vicinity of Site

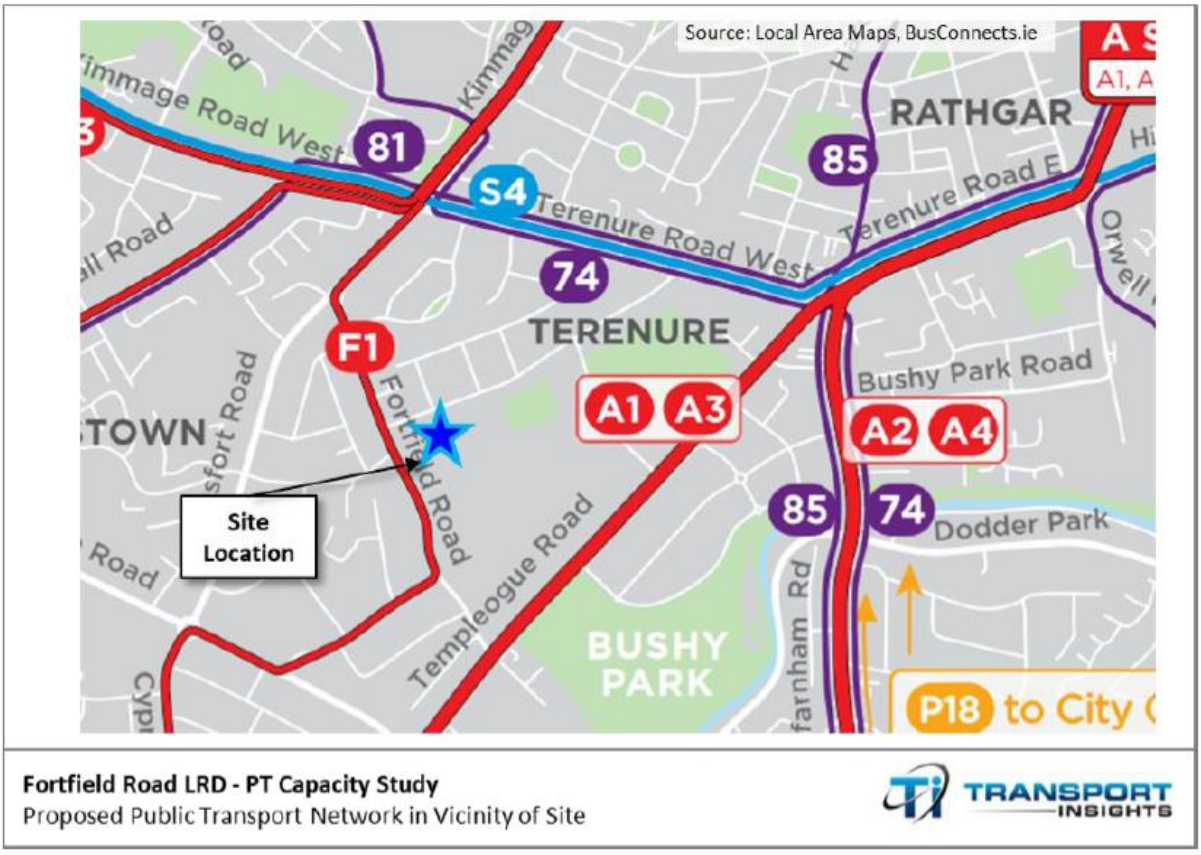


Figure 14 Extract from Transport Insights Report indicating the proposed Public Transport Network in the vicinity of the site

The Compact Settlement Guidelines 2024 notes that "*In areas where car-parking levels are reduced studies show that people are more likely to walk, cycle, or choose public transport for daily travel. In order to meet the targets, set out in the National Sustainable Mobility Policy 2022 and in the Climate Action Plan 2023 for reduced private car travel it will be necessary to apply a graduated approach to the management of car parking within new residential development."* Therefore, in line with SPPR 3 of the Compact Guidelines car parking has been "*substantially reduced.*"

It is on this basis, and in line with the Apartment Guidelines 2023 and the DCDP Appendix 5, Table 2, , that the proposed level of car parking at 0.52 parking space per apartment and 1 no. parking space per house is proposed.

An Bord Pleanála Reasons for Refusal

This decision to refuse was subsequently appealed to An Bord Pleanála by the applicant. This was subsequently refused on the 02/02/23 for three reasons. These reasons are set out below along with a rationale of how the current application overcomes them.

1. ***Having regard to the information submitted in the course of the application and appeal, the board do not consider that it has been demonstrated that the site is not needed for its established educational and recreational use. The site in relation to the proposal is not in accordance with the objectives and requirements set out in section 14.7.14 of the Dublin City Development Plan 2022-2028 for residential development on lands zoned for Community and Social Infrastructure under objective Z15 of the plan do not apply to the site. The proposed residential development would therefore materially contravene the zoning of the site.***

How this is addressed in this application

The provision of residential development on this site is Open for Consideration subject to compliance with section 14.7.14. Please see the Z15 Compliance Statement by McGill Planning Limited submitted with this application. This demonstrates that the proposed development is fully in accordance with the requirements set out in section 14.7.14 of the City Development Plan. Therefore, the proposal as now proposed and details is not considered to be a material contravention of the Z15 zoning and is compliance with the City Development Plan and the proper planning and sustainable development of the area.

2. ***The proposed development would involve the construction of housing on lands partially in Flood Risk Zone B, as set out in the Planning System and Flood Risk Management for Planning Authorities (including the associated Technical Appendices), issued by the Department of the Environment, Heritage and Local Government in 2009 and in the Dublin City Development Plan 2022-2028.The proposed location on residential development partially within this flood risk zone would be contrary to the advice at section 3.5 of the guidelines and section 4.5.2.1 of volume 7 of the city development plan 2022-2028, and would, therefore, be contrary to the proper planning and sustainable development of the area.***

How this is addressed in this application

The proposed site layout has been altered to accommodate on site mitigation measures to address pluvial flooding on Fortfield Road. A revised Site Specific Flood Risk Assessment, taking into account these revisions, has also been completed by PUNCH Consulting Engineers. As a result it is confirmed that the proposed development is wholly located in Flood Zone C and that it will remove pluvial flooding from a section of Fortfield Road.

Figure 15 Top: Proposed detention basin in current application; bottom left previous proposal; bottom right current proposal

As set out above, PUNCH Consulting Engineers Site Specific Flood Risk Assessment confirms in the Executive Summary that "*As pluvial flooding should not be used in the designation of flood zones, and in the absence of any identifiable fluvial or coastal flood risk to the site, it is concluded that the proposed development site is wholly located in Flood Zone C.*"

Furthermore, the SSFRA goes on to state that "A *proposal has been developed, in direct consultation with DCC, to address the pluvial flooding on Fortfield Road, which includes the provision of a detention*

basin within the proposed development site boundary. These flood alleviation measures will also remove pluvial flooding from a section of Fortfield Road for storm events up to and including the 1%AEP event, offering a significant reduction in pluvial flood risk to that area over existing conditions. A further exercise was carried out which confirmed that there is sufficient storage available within the site to ensure that the development will not flood even in the extreme 0.1%AEP pluvial event. The redevelopment of the site will not adversely affect pluvial flood levels or extents in the area."

Finally, the SSFRA states that "*It is asserted that the proposed development site is wholly located in Flood Zone C and therefore a Justification Test is not strictly required as part of this SSFRA report. However, given that the site is shown within Flood Zones A and B on the Dublin City DP SFRA mapping it was deemed prudent to complete the Justification Test.*

The mitigation measures proposed in this SSFRA will ensure that the development is in compliance with the relevant sections of the Dublin City DP as well as in full compliance with the Dublin City DP SFRA and OPW's The Planning System & Flood Risk Management Guidelines."

3. ***The density of the proposed development exceeds recommended for outer suburbs in Table 1 of Appendix 3 to the Dublin City Development Plan 2022- 2028. The site is considered to be in an intermediate urban location as set out in section 2.4 of the Guidelines on the Design of New Apartments issued by the Minister in 2022, and it is considered that the proposed density is not justified by the available capacity of current public transport facilities. The quantum of housing proposed, is therefore, excessive and would, therefore be contrary to the proper planning and sustainable development of the area.***

How this is addressed in this application

The Guidelines on the Design of New Apartments issued by the Minister in 2022 were amended in July 2023 and the density of the Proposed Development is assessed by reference to the amended Guidelines. In line with these Apartment Guidelines, and Appendix 3 Table 3, Item 8 of the Dublin City Development Plan, this current revised proposal is for 284 no. residential units. This is a reduction of 101 units and results in a reduced net density area of 107uph (previously it was 146uph). This density is in line with Appendix 3 of the Development Plan which provides a "*general rule*" for density ranges of 60-120uph for *Outer Suburbs*. The Development Plan also allows for increased height and density provided the development meets the performance criteria as identified in Appendix 3, Table 3 This site is considered an appropriate site for increased densities in line with the Compact Settlement Guidelines 2024 and the Apartment Guidelines 2023. This is discussed in further detail in the planning policy section below.

It is also noted that 'Intermediate Urban Locations' as defined in the Apartment Guidelines 2023 are suitable *to higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary but broadly >45 dwellings per hectare net).*

Under the Compact Settlement Guidelines 2024, this site falls under the definition of *City – Urban Neighbourhood* as it is a residential area close to the city centre which has excellent access to a range of land uses given its proximity to Templeogue and Terenure. It is within walking distance of employment, education, retail and recreational uses.

The site also falls within the definition of both a *High Capacity Public Transport Node or Interchange* and an *Accessible Location* due to the site's proximity to (within 500m) Bus Stop 1159 which serves

bus routes 15, 49, 65 and 65B and has a 10 minutes service at peak times as set out above and within both the Public Transport Capacity Assessment by Transport Insights and the Traffic and Transport Assessment by PUNCH Consulting Engineers. As set out in Table 3.1 of these guidelines "*it is a policy and objective of these Guidelines that residential densities in the range **50dph to 250dph** (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.*"

This proposal is therefore fully compliant in density terms with current National and Local Planning Policies.

4. Rationale For Development

The current proposed development will comprise the following:

- A Large-Scale Residential Development with 284 residential units (265 Apartments and 19 Houses) all have private gardens, terraces or balconies facing north, south, east or west.
- The buildings will range in height up to 6 storeys.
- Residential Amenities, Creche, Community/Cultural/Arts Space
- All associated site development works, vehicular access, landscaping (including public and communal open space), boundary treatments, car and cycle parking (at surface and basement), bin stores, substations and service provision.

This is a site formerly used by a previous primary school for recreation. The primary school is now closed. It is located within a long-established and well served residential area. The site has access from Fortfield Road with ease of access to frequent bus services, shops, employment and community facilities. It is an ideal site for higher density residential development at this serviced, accessible location.

It is worth noting that the key significant design changes of the current scheme, when compared to the previous application are as follows:

- Reduction quantum and density of development proposed. The number of residential units proposed has decreased from 385 no. units to 284 no. units (minus 101 units). Overall density has reduced by 27%.
- All residential units are now Build to Sell (previously the apartments were Build to Rent).
- Reduction in building height from 7 storeys to a maximum of 6 storeys.
- Increase in the apartment car parking ratio 0.4 from to 0.52 spaces per unit.
- Provision of Community, Culture and Arts Space and a creche on site.
- The provision of additional attenuation/ SuDS area.
- Access to the Lakelands Park is omitted and there is a single vehicular/ pedestrian/ cyclist access off Fortfield Road.

Development	Site Statistics	Refused LRD

Unit Mix	284 no. residential units
	• 265 Apartments comprising
	  • 10 no studios;
	  • 117 no 1 beds;
	  • 129 no. 2 beds;
	  • 9 no. 3 beds.
	• 19 Houses
	  • 19 no. 4 beds.
		385 no. residential units
		364 Apartments
		  ○ 15 no. Studios
		  ○ 166 no. 1 beds
		  ○ 174 no. 2 beds
		  ○ 9 no. 3 beds
		• 21 Houses
		  ○ 5 no. 2 beds
		  ○ 16 no. 4 beds

Community, Culture and Arts Space	1,413.6sqm of which 1,214.6sqm Indoor Space and 199 sqm External Space	0 sqm
Creche	100sqm creche providing space for 17 children with 153sqm external space	0sqm
Residential Amenities	301.3sqm of residential amenity and support facilities	Residential Support Facilities/ Amenities associated with BTR
Dual Aspect	63% dual aspect (60% apartments)	61%
Density	Gross Site Area: 61.2 uph Net Site Area: 107.4 uph	Gross is 81uph Net is 146
Net Plot Ratio	1.06	1.3

Net Site Coverage	30%	31%
Building Height	Housing: 2/3 storeys Apartments: 3-6 storeys	Housing: 2/3 Apartments: 7 storeys
Public Open Space	6,989.35sqm. A further 14,257.8sqm when the gross area in Z15 zoned land is considered. There is also 11,874sqm of Z11 zoned land which provides a visual amenity via the large pond.	8,828sqm
Communal Open Space	4,492.22 sqm	3,419sqm
Car Parking	165 no. space	160 no. space
Cycle Parking	611 no. spaces	577 no. spaces

This revised layout is therefore considered to be fully compliant with the Development Plan and takes into account the observations from the surrounding residents on the previous application.

Layout and Design

The proposed residential development sets out 4 no. apartment blocks ranging in height from 3-6 storeys along with a row of two – three storey housing along the northern portion of the site. These houses act back onto the existing houses along Greenlea Road to the north and provide an appropriate transition to the apartment blocks with the heart of the site The buildings have been designed to create a transition from west to east, gradually rising in height away from the existing 2 storey housing in the adjoining areas.

A generous setback is provided along Fortfield Road to offer an appealing landscaped open space while creating a green buffer area between the proposed housing and the road.

Public open space is provided to the southeastern portion of the site with communal open space being provided in between blocks. Car parking is primarily at basement level providing a largely car-free scheme, encouraging walking and cycling as forms of transport.

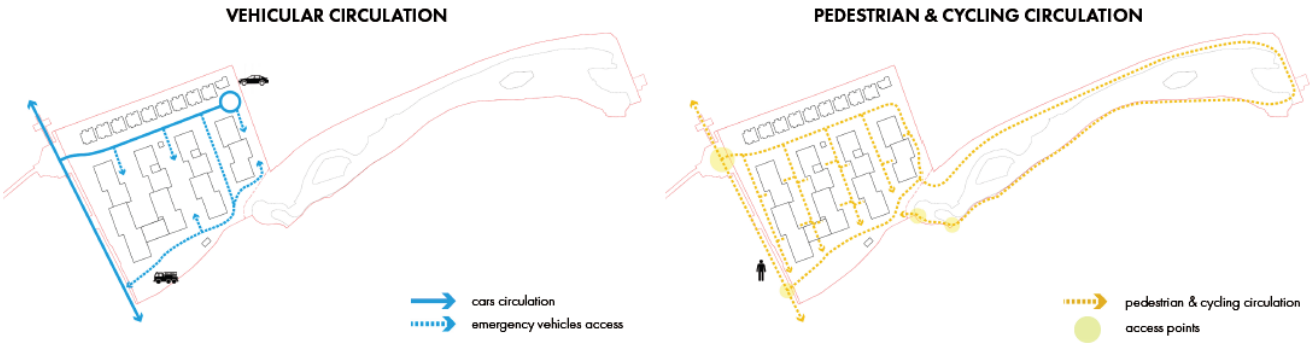


Figure 17 Site Layout Plan. Source: Urban Agency

Figure 16 Vehicular and Pedestrian Circulation. Source: Urban Agency DS

The proposal seeks to improve the dead frontage along Fortfield road which currently comprises a wall running along the site's western boundary. The proposal also seeks to open up the site creating a safer and more pleasurable environment for pedestrians and residents of the scheme. This will

include the reduction in height of the existing wall, placing railings on top of the wall, ensuring the original boundary line is maintained while providing visual links and physical links between the proposed development and Fortfield Road. New pedestrian gaps will be created in this wall. It is also noted that there is a small section which is being retained in full, this section has been assessed by John Olly and he has confirmed that this is the only section of original wall. Please see the Historical Landscape Assessment by John Olly.

Figure 18 Current frontage along Fortfield Road. Source: Urban Agency

Figure 19 Proposed Development, view from College Drive/Fortfield Road Junction. Source: Urban Agency Architects

Density

The proposed density of 107 uph is in line with the DCDP which seeks to achieve a density within the range of 60-120 uph in 'Outer Suburbs'. Please refer to the assessment of 'Appendix 3, Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density, and Scale' from the DCC Development Plan, included in the statement of consistency later in this document.

Furthermore, the density is in line with the Apartment Guidelines 2023 for Central and/ or Accessible Urban Locations due to its proximity, at 498m, from the 15 bus route which runs every ten minutes. These guidelines provide that *"Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus service"* are generally suited for "*small to large scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments.*"

It is also noted that Intermediate Urban Locations, as defined by the Apartment Guidelines, are also confirmed to be appropriate for "*higher density development that may wholly comprise apartments, or alternatively, medium- high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:*"

Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) , or principle town or suburban centres or employment locations, that may include hospitals and third level institutions;

Sites within walking distance (i.e. between 10-15 minutes or 1,000- 1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;".

The proposed development, made up of apartments and houses, has a density that is considered appropriate in line with the Apartment Guidelines 2023 and given the proximity of the site to public transport, as demonstrated by its location 0.5km from Bus Stop 1159 on Templeogue Road and the associated availability of high frequency bus routes. Furthermore, there will be increased accessibility as a result of the BusConnects project which will include the F1 route along Fortfield Road and the A1 and A3 routes along Templelogue Road. The site's proximity to shopping, community facilities and employment locations, as demonstrated in the Site Description and Context section of this report, further emphasise this and will ensure the delivery of the most sustainable form of development, making the best use of this scarce resource, zoned serviced land.

The density is also in accordance with the Compact Settlements Guidelines 2024, under these Guidelines, the site would be considered to be located in a City-Urban neighbourhood with ***residential densities in the range 50 dph to 250 dph (net).*** Please refer to the Statement of Consistency within this report for further detail.

Policy document		
Proposed Site Density	Urban Agency Schedule of Accommodation Gross Site Area: 59.5 uph Net Site Area: 107.4 uph	
Development Plan	Section 15.5.5 Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 Guidelines which seek to consolidate development within exiting urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for	It is noted that within the Development Plan itself no density is set. It is only within the appendices that appropriate density ranges are set. The layout of the site reflects the surrounding

<table>
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<td>the critical mass for successful functionality of public transport facilities.

New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods.

All proposals for higher densities must demonstrate how the proposal contributes to place making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods. Refer to Appendix 3 for further details.</td>
<td>character. It provides two and three storey housing along the northern boundary immediately adjacent to existing two storey housing. The buildings then rise to the south and as they journey to the east of the site. This provides an appropriate increase in height and density in a location where there are no immediately adjacent residential houses.

The increased density, and the high quality of the urban design within the scheme ensure appropriate, attractive place to live and visit while also supporting the vitality and viability of the area.

As demonstrated by the Public Transport Capacity Study there is sufficient capacity on the existing bus routes to accommodate these additional properties.</td>
</tr>
<tr>
<td>Appendix 3, section 3.2, Table 1 Density Ranges</td>
<td>
<table>
<tr><th>Location</th><th>Net Density Range (units per ha)</th></tr>
<tr><td>City Centre and Canal Belt</td><td>100-250</td></tr>
<tr><td>SDRA</td><td>100-250</td></tr>
<tr><td>SDZ/LAP</td><td>As per SDZ Planning Scheme/LAP</td></tr>
<tr><td>Key Urban Village</td><td>60-150</td></tr>
<tr><td>Former Z6</td><td>100-150</td></tr>
<tr><td>Outer Suburbs</td><td>60-120</td></tr>
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</td>
<td>This site is located in the Outer Suburbs. Therefore with a gross density of 59.5uph, and a net density of 107uph it is in accordance with the density range set in this table.</td>
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Apartment Guidelines 2023	1) Central and/ or Accessible Urban Locations Such locations are generally suitable for small to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including • Sites within walking distance (i.e. up to 15 minutes or 1,000-1,5000), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions • Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000) to /from high capacity urban public transport stops (such as DART/ LUAS); and • **Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services** **2)** Intermediate Urban Locations Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium – high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net), including - **Sites within or close to i.e. within reasonable walking distance (i.e up to 10 minutes or 800-1000m) of principle town or suburban centres or employment locations**, that may include hospitals and third level institutions; - Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,5000m) of high capacity urban public transport stops (such as DART, Commuter rail or Luas) **or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban services or where such services can be provided;** - **Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.**	This site is located c. 1km from both Templelogue Village and Terenure Village. It is immediately beside Terenure College and is adjacent to Our Lady's School. As set out above and within the PTCA and TTA the site is within 500m of a high frequency bus service. Given the frequency of the Bus Services and the high volume of bus routes within the vicinity this site is on the cusp between a Central and/ or Accessible Urban Location and an Intermediate Urban Location. In both instances, higher density development is considered appropriate, with the delivery of apartments as well as housing. This proposal's density is therefore in accordance with this guidance.
Compact Settlement Guidelines, 2024	Section 3.3 Settlements, Area Types and Density Ranges **Table 3.1 – Areas and Density Ranges Dublin and Cork City and Suburbs** **City- Urban Neighbourhoods** The city urban neighbourhood category includes: (**i) the compact medium density residential neighbourhoods around the city centre that have**	This site, as set out above, has excellent access to public transport. It is also a location proximate to employment and education uses. It is within a well-

	evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and **(iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are high accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.	established suburb close to Dublin City Centre. As such it is considered to accord with this category which promotes a density range of between 50 -250 dwellings per ha.
	Table 3.8 Accessibility **High Capacity Public Transport Node or Interchange** - Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or Metrolink services; **or locations within 500 metres walking distance of an existing or planned Bus Connects Core Bus Corridor 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.	As set out in the TTA and the PTCA this site is within 500m of an existing high frequency bus service. Fortfield Road has proposed bus route F1 which is part of the planned Bus Connect Corridor Bus stop. Therefore this site can be considered a site with High Capacity Public Transport Node or Interchange or as an Accessible location.
	Accessible Location - **Lands within 500 metres (i.e. up to 5-6 minutes' walk of existing or planned high frequency (i.e. 10 minutes peak hour frequency) urban bus services.**	

Unit Mix

The proposed unit type and mix breakdown is as follows:

Unit Type	Unit Size	No. of Units	Percentage
Apartment	Studio	10	4%
	1 Bed	117	41%
	2 Bed	129	45%
	3 Bed	9	3%
Total Apartment		**265**	**100%**
Houses	4 Bed	19	100%

Total Houses		**19**	**100%**

The total unit mix breakdown for the entire development is as follows:

Unit Size	No. of Units	Percentage
Studio	10	4%
1 Bed	117	41%
2 Bed	129	45%
3 Bed	9	3%
4 Bed	19	6%
Total	**284**	**100%**

The proposed housing mix is in accordance with the DCDP and the Apartment Guidelines SPPR1. The existing wider area is generally characterised by low density two storey suburban housing providing three and four bed housing. The provision of more apartments, which are smaller in size, is reflective of the current demographic change in Ireland towards smaller household sizes. This proposal will provide for a greater diversity and choice of housing in this area overall.

Dual Aspect

100% of the houses proposed are dual aspect. 60% of the apartment units are dual aspect, which is in compliance with the DCDP and the requirements set out in SPPR 4 of the Apartment Guidelines 2023 for dual aspect units. All these units are true dual aspect. There are no single aspect north facing units.

Housing Quality Assessment

A Housing Quality Audit prepared by Urban Agency Architecture is enclosed with the application. This sets out the housing and apartment mix throughout the proposed development, the size of all the units, the quantum of private open space, storage space, living/dining/kitchen areas, bedroom areas, and dual aspect. The Housing Quality Assessment demonstrates that the proposed development meets all the requirements of the DCDP and the Apartment Guidelines.

Daylight, Sunlight and Shadowing

A Daylight, Sunlight and Overshadowing Assessment has been carried out by OCSC and is submitted with this application. In terms of Internal Daylight as set out in the introduction, *"the results demonstrate a 98.7% compliance rate with Criterion I of the BRE Guide 3rd Edition daylight standard and a 98.3% compliance rate with Criterion II. Additionally, the second assessment, based on the DCDP standards in Appendix 16, achieved a 99.7% compliance rate. Units that do not fully meet the daylight recommendations have been supplemented with various compensatory measures*"

The Sunlight to Windows assessment has shown "*81% of windows to bedrooms and living areas are receiving the minimum recommended levels of sunlight, as tested against the BRE Guide 3rd Edition. The BRE Guide 3rd Edition states that compliance is to be calculated on a dwelling by dwellings basis. Using this methodology, the compliance rate is 97%, with 275 of the 284 units in the scheme achieving the BRE Guide 3rd Edition recommendations for sunlight*"

The Sunlight to Amenity Spaces assessment confirms that "*In relation to amenity space sunlight, all open amenity spaces in the development show compliance with BRE Guide 3rd Edition*

recommendations, with all amenity spaces receiving more than 2 hours of sunlight on March 21st test day – Achieving ranges of between 76% and 100%"

The Impact to surrounding properties assessment confirms that "*The proposed development will not impact surrounding properties, as careful consideration has been given to maintaining a reasonable distance to prevent any loss of light to existing windows. Only two properties were identified as potentially affected and, therefore, required a Vertical Sky Component (VSC) analysis, one has no windows facing the development and the other demonstrated 100% compliance with Section 2.2.7 of the BRE Guidelines:*

'If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing Building"

Finally, the report confirms with regard to Overshadowing Assessment that "*our overshadowing analysis that minimal impact can be perceived on the adjacent properties. This is further supported by the fact that the proposed development does not subtend more than 25 degree angle to the horizontal from the existing windows*".

Open Space

The proposed scheme provides 6,989.35 sqm of public open space within the net site area (2.64ha which excludes the existing lake and adjoining open space at the eastern side of the site, and also excludes any works on Fortfield Road). This equates to 26.5% of the net site area and is above the minimum requirement of 25% (or 6,600 sqm) public open space.

The open space that is being considered is as shown below. This open space calculation does not include the lands zoned Z15 surrounding the lake or the lake itself (Z11). The public open space also does not include the area allocated to Community, Culture and Arts.

The gross public open space provision within the gross site is 26,131.75 sq.m or 56% of the gross site area.

A further 4,492.22sqm of communal open space is also proposed which exceeds the requirements of the DCDP and the Apartment Guidelines standards which requires a minimum of 1,609sqm.

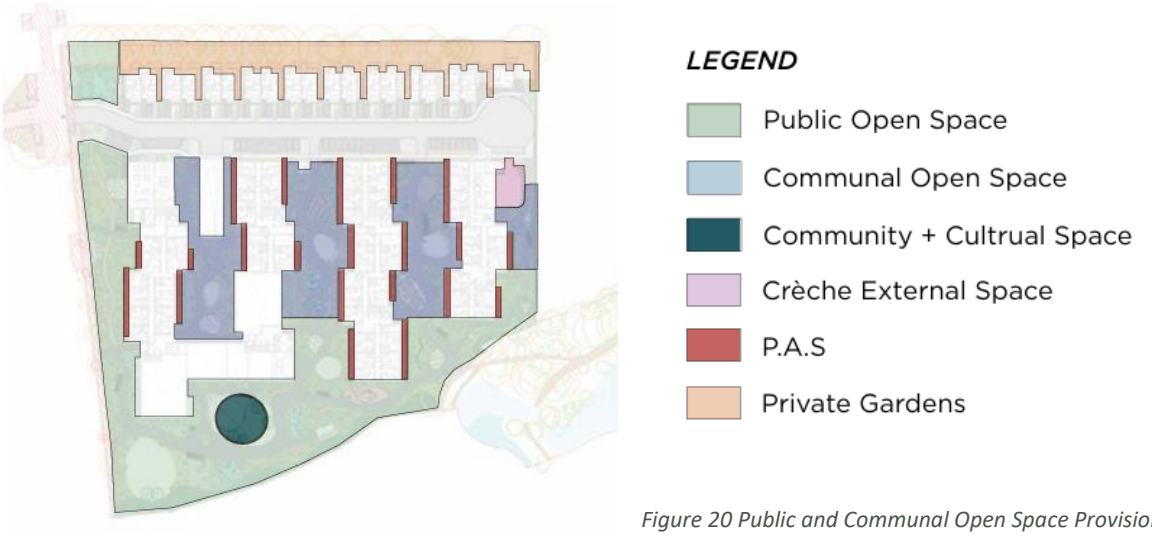

Figure 20 Public and Communal Open Space Provision

The proposed public open spaces contribute to the public domain and will be fully accessible to the public for the purposes of active and passive recreation. The open space will predominately comprise a single large area to the south of the site and including the existing lake and woodland. This entire area, including the lake and woodland as public open space could be taken in charge by DCC to provide a significant new park for the area. Currently, these lands are privately owned. As shown in the figure below, the proposed public open space, the lake and lakeside amenity area would amount to c.26,131.75 sqm of open space.

Figure 21 Total Open Space Provision

Figure 22 Accessible Public Open Space Provision

The communal open space will provide visual breaks between the residential blocks, also facilitating biodiversity and the maintenance of wildlife habitats. The communal open space is located at ground floor and roof terraces and will be secured where relevant with a low railing and gate to access but allow visual permeability.

All units are provided with private open space by way of balconies and terraces. The houses will be provided with rear gardens that all exceed 73. 6sqm.The open space standards of the DCC

Development Plan which states *"Generally, up to 60-70 sq. m. of rear garden area is considered sufficient for houses in the city."*

Internal Residential Amenity and Community, Culture and Arts Space

Residential amenity

The proposed development includes 301.3sqm of residential amenity space located on the ground floor of Block A, adjacent to the site's main access off Fortfield Road. The space proposed includes a co-working space designed so that this space is independent of resident's own apartments but is conveniently located within the overall development, offering an alternative workspace. This space also includes a meeting room and a multipurpose room which can be used for social gatherings or community events. This space has been designed to be flexible.

Community, Culture and Arts Space

The proposal also includes for 1,413.6sqm of space dedicated to Community, Culture and Arts. This equates to 5% of the total floor area. 1,214.6sqm of this space is located internally within the ground floor of blocks A and B, linked by a single storey link building. This space has been designed to a scale in which multiple uses can avail of including artist workshops, performances spaces, rehearsal studios etc.

A further 199sqm of Community, Culture and Arts space is located immediately adjacent to the proposed internal space and can be used for a variety of uses and has been designed as multifunctional flexible space to meet the needs of adjacent building uses and the wider community. The space is a sunken elliptical amphitheatre lawn with a central hard space and a sail covering allowing it to be utilized in any weather conditions. The space can be used as a performance space, to hold smaller market or gallery events for the artist community.

This space has been designed in accordance with Turley's Associates following their assessment of the Community, Culture and Art space needs for the area. This is considered to be an appropriate provision in line with their report which is enclosed with this application.

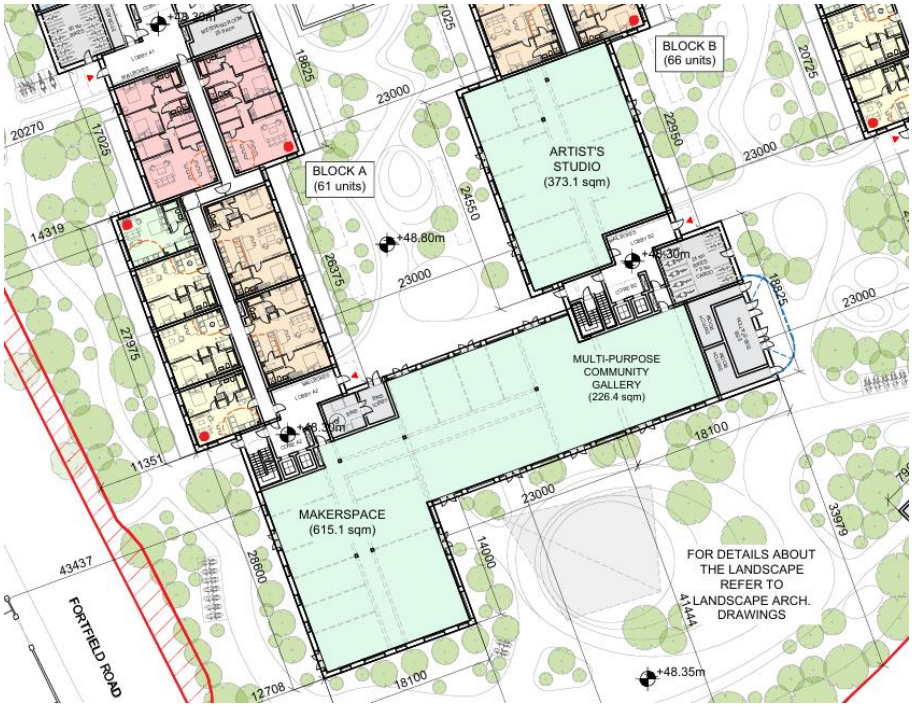

Figure 23 Community Cultural and Arts Floor Space. Source: Urban Agency Architects

Childcare

A Childcare Assessment Report has been carried out by Turley to determine the existing childcare provision in the study area and to ascertain the need, or likely demand, if any, for a childcare facility to be provided as part of the proposed development.

The report concluded that the demand for childcare arising from this development is very low, comprising a demand for 3 to 6 no. childcare spaces in accordance with the Childcare Guidelines 2001 and the Apartment Guidelines 2023. As required by the DCDP (2022-2028), childcare facilities within a 1km study area have been reviewed and confirmed by telephone survey at a robust response rate of 82%. This survey confirms that there are 11 no. childcare facilities operating within 1 km of the subject site providing 550 no. childcare spaces and a vacancy rate of 8 no. children. As a consequence, no childcare provision is required as part of the development via a standalone facility or otherwise. This approach reflects recent precedent accepted by ABP (DCC Ref: LRD6018/22-S3 and ABP Ref: 316176) in the area.

Notwithstanding this, a creche of c.100.0sqm to accommodate 17 no. children is proposed on the ground floor of Block D with an external play area of c.153sqm. The proposed creche is located to the north-east corner the of site which is considered to be the most optimal position due to its proximity in relation to the access road and drop off area, and to ensure privacy. This further contributes to the provision of community facilities to the area.

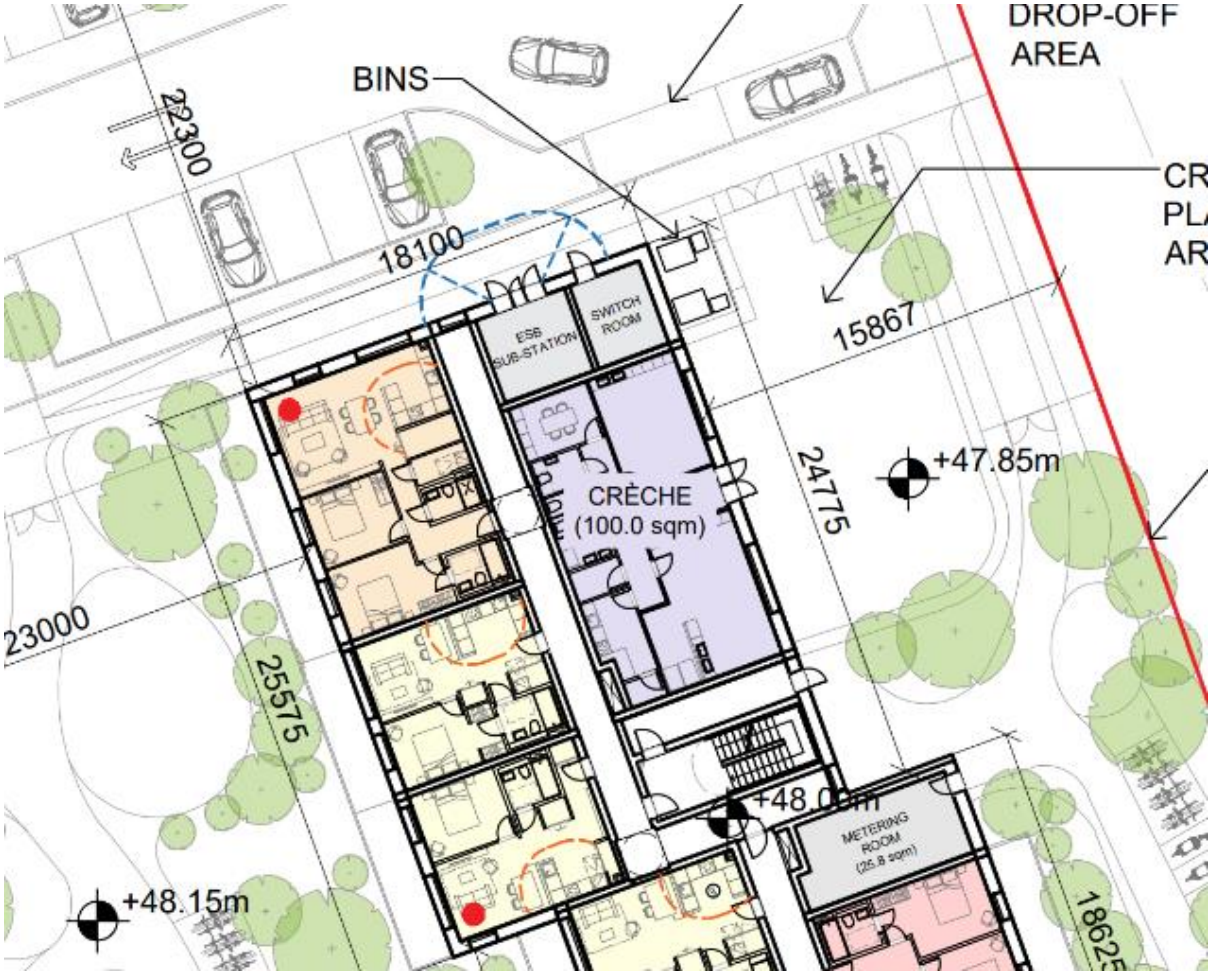

Figure 24 Block D with ground floor creche and associated outdoor space

Transport, Access and Parking

Proposed vehicular, pedestrian and cyclist access to the site is from Fortfield Road to the west via the proposed four arm junction. The design has been assessed against DMURS and an independent Quality Audit which are submitted as part of this planning application. PUNCH also have completed a DMURS Compliance Statement which concludes that the proposal is consistent with the key design principles and requirements as set out in DMURS.

PUNCH drawings provide details of upgrade works to the access road and junction. The proposals have been assessed by Bruton Consulting Engineers in their Quality Audit submitted with this application. This includes a Road Safety Audit, Access Audit, Cycle Audit and Walking Audit. Any issues identified in the Quality Audit have been addressed in the updated drawings provided by PUNCH ensuring that the development is compliant with the principles of DMURS and will accommodate safe pedestrian and cycle movements that will be generated as a result of this development.

There are 165 car parking spaces in total proposed as part of the development. 19 no. spaces are proposed to serve the houses to the north of the site. 138 no. spaces are proposed to serve the residential apartment component. This consists of 112 no. spaces at basement level and 26 no. spaces at grade (including Car Share, Visitor and Disabled Parking.). The overall provision of 138 no. spaces for the apartments provides a ratio of 0.52 per unit. In line with DCDP, 100% of parking spaces allocated to dwellings and car share will have EV charging infrastructure, and 50% of all spaces serving

the apartment units have EV charging infrastructure. 100% of the spaces proposed will be future proofed for electrical charging.

The Cultural, Community and Arts space is provided with 4 no. car parking spaces, the creche contains 1 parking space and the 2 no. drop off spaces. There is 1 no. delivery/service vehicle loading bay proposed.

All houses have cycle parking within their curtilage. In addition, the proposal provides for a total of 611 cycle parking spaces, comprising of 465 no. long term spaces, 146 no. short term spaces (including 35 cargo spaces.) This is higher than the Development Plan standard which sets out a requirement of 545 spaces in total. This provision equates to 2 spaces per unit and all these spaces are accessible secure cycle parking spaces.

PUNCH Engineering have completed a Traffic & Transport Assessment, Car and Cycle Parking Management Plan, a Residential Management Plan and a Public Transport Capacity analysis, all of which supports the inverse of the norm with low car parking provision and very high cycle parking.

The proposed parking provision of 165 Spaces is in accordance with the Development Plan's maximum standard policy. It is also in accordance with the Apartment Guidelines 2023 and the Compact Settlement Guidelines 2024 both of which seek reduced car parking in accessible locations such as these which have good, high frequency public transport within 500 metres of the site.

As set out in the Traffic and Transport Assessment prepared by PUNCH Consulting Engineers, a reduced provision of private vehicle car parking is consistent with National Policy and applicable to the development given the context of proposals, i.e. *"In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances"*, "*Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services."*. The proposed car parking provision is consistent with these policies and is further justified based on existing modal split patterns in the area, the availability of public transport (as detailed in the Residential Travel Plan), the provision of car sharing facilities and a generous provision of cycle parking facilities as outlined in detail above.

The Public Transport Capacity Study prepared by Transport Insights and submitted as part of this application has undertaken a baseline public transport capacity assessment of bus occupancy rates at 2 no. bus stops (no. 1125 and no. 1158 servicing routes 15,49,65B and 65) located along Templeogue Road. This study was conducted on a Tuesday during both the AM peak period (7:30-9:30hrs) and PM peak period (16:30-18:30hrs).

The study confirmed that during the AM peak period, the northbound bus stop no. 1158 (i.e. in direction of peak travel towards Dublin City Centre), had an average excess capacity of 54% across the two-hour survey period, and an average excess capacity of 42% during the absolute busiest peak hours of 7:30-8:30AM. This route has an average excess capacity of 79% during the PM peak hours as passengers travel towards Dublin City Centre.

The study also found that all buses travelling southbound during the AM peak survey period at bus stop no. 1125 were found to have capacity with an average excess capacity of 89%, and an excess capacity of 84% during absolute busiest peak hours. This route had an average of 51% excess capacity during the PM peak survey period, with a 43% excess capacity at the busiest peak hour.

Based on the survey results, during weekday AM and PM peak hours surveyed, buses have more than 42% excess capacity in the direction of peak demand (i.e. towards the city centre in the AM and from the city centre in the PM).

Utilising the modal splits and TRICS People Trip rates produced by PUNCH in the Residential; Travel Plan and Traffic & Transport Assessment , the Public Transport Capacity Study has concluded that future residents of the proposed development would utilise c. 2% and 1.7% of the total capacity of existing AM and PM peak hour bus services respectively. It is apparent that the current public transport capacity within the application site's vicinity is sufficient to accommodate additional demand generated by the proposed development.

Furthermore, this level of car parking will encourage a positive modal shift to sustainable modes of transport thereby:

- reducing dependence on private car as a means of travel
- increasing and facilitating the number of people choosing to walk, cycle or travel by public transport
- enabling a unified approach to traffic management for the site.

Given the site's location proposed cyclist facility and pedestrian facility, the site's ,proximity to high frequency public transport, the existing capacity available on the high frequency bus routes and within easy walking distances of community and retail facilities and the nature of the proposed development, it is considered that the proposed car and cycle parking standard are appropriate and will result in a highly sustainable development in line with National, Regional and Local Planning Policy.

Engineering Services and Flood Risk

The site has a gross site area of 4.64 ha and slopes gently in a north westerly direction. There is an existing stormwater sewer flowing south to north along Fortfield Road. There is also the existing lake located at the site's south-eastern boundary. Due to the topography of the site, it is not possible to discharge the surface water from the site to the existing lake and therefore it is proposed to discharge to the stormwater sewer on Fortfield Road. Interception, treatment and attenuation measures will be provided to reduce, treat and restrict outflow from the site.

It is proposed to connect the scheme to a watermain along College Drive. Uisce Eireann have provided both a Confirmation of Feasibility dated the 20th February 2024 and a Statement of Design Acceptance dated the 28th August 2024 from Uisce Eireann. The Statemend of Design Acceptance confirms that *"We have reviewed your proposal for the connection(s) at the Development. Based on the information provided, which included the documents outlined in Appendix A to this letter, Uisce Éireann has no objection to your proposals."* Please see the drawings and Infrastructure Report by PUNCH Consulting Engineers for further details.

The Site Specific Flood Risk Assessment undertaken by PUNCH Consulting Engineers conducted a hydraulic model of the pond and extreme event flood levels assessment to establish if the pond located within the site boundary would pose a flood risk to the proposed residential development. The results of the hydraulic modelling indicate that flood waters from the 1%AEP and 0.1%AEP events are retained within the contoured lands around the pond and do not pose a flood risk to the proposed development. The proposed development site is therefore deemed to be within Fluvial Flood Zone C. A minimum FFL of 48.0mOD is proposed.

Ecological Assessment

An Ecological Impact Assessment, Appropriate Assessment Screening and a Natura Impact Statement have been completed by Altemar Marine and Environmental Consultancy.

The Ecological Impact Assessment concludes that *"The construction and operational mitigation proposed for the development satisfactorily addresses the potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the ecology of the proposed development will result in a long term minor adverse not significant long term residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategy."*

The conclusion of the Natura Impact Statement is *"In a strict application of the precautionary principle, the AA Screening concluded that significant effects on South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA, North Bull Island SPA and North-West Irish Sea SPA cannot be ruled out from the proposed works in the absence of mitigation measures, primarily as a result of direct hydrological connection to the site via the direction of surface water to the River Dodder and into the River Liffey, with possible downstream impacts from the project during the construction, landscaping and drainage works.*

As a result, there is potential for downstream impacts on European Sites from the project during site clearance, enabling, construction, landscaping and drainage works. In the absence of mitigation measures, it is considered that significant effects on the qualifying interests of European sites are likely.

For this reason, this NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European Sites. All other European sites were screened out at initial screening.

Construction on this site will create localised light and noise disturbance that will not impact on Natura 2000 sites. Mitigation measures will be in place to ensure that there are no significant impacts on the surface water that leads to Dublin Bay. Surface water discharge from site will be developed in accordance with: The Greater Dublin Strategic Drainage Study Volume 2; The Greater Dublin Regional Code of Practice for Drainage Works; BS EN – 752:2008, Drains and Sewer Systems Outside Buildings; and, Part H, Building Drainage of the Building Regulation.

Following the implementation of the mitigation measures outlined, the construction and presence of this development would not be deemed to have a significant impact on the integrity of European sites. No significant impacts are likely on European sites, alone in combination with other plans and projects based on the implementation of standard construction phase mitigation measures.

This report presents an Appropriate Assessment Screening and NIS for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

No significant effects are likely on European sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites."

Part V

A Part V proposal is submitted with this Planning Application Please refer to the drawings and costings contained in the Part V Pack. The proposed Part V provision is in compliance with DCC DP Objective QHSN34 relating to Social, Affordable Purchase and Cost Rental Housing.

Universal Design

A Universal Design Statement has been provided by Urban Agency Architects which assesses the scheme against the seven principles of Universal Design and confirms access throughout the development for all people regardless of age, size, ability or disability.

5. Statement of Response to S247 Comments by Dublin City Council

The S247 Meetings took place between the applicant's design team and Dublin City Council on the 19th of December 2023 via MS Teams.

First S247 Meeting Details

Attendees

Kiaran O Neill (Dublin City Council)
Eileen Buck Hart (Dublin City Council)
Heidi Thorsdalen (Dublin City Council)
Trevor Sadler (MCG Planning)
John Cooney (Lioncor)
John Maxwell (Lioncor)
John O Donohoe (Lioncor)
Maxim Laroussi (Urban Agency)
Fabiana Suella (Urban Agency)
Paul Casey (PUNCH)

Issues raised by Dublin City Council (notes taken by applicant)

Z15 zoning and need for confirmation that lands not required for educational purposes.

- Please also refer to the Z15 Statement of Compliance prepared by McGill Planning Ltd which demonstrates that the development of this land is fully in accordance with the Z15 zoning for this land and will achieve the stated objective "*To protect and provide for institutional and community use*" while delivering much needed houses in this area. This is in line with the Development Plan within which Residential is 'Open for Consideration' upon compliance with the criteria outlined in section 14.7.14 of the development plan.
- The applicant has been in consultation with the Carmelite Order and both with the Department of Education. The Carmelite Order have confirmed that this land is not required for educational use as per their letter attached with this application. The Carmelite Letter and the Applicant Letter also confirm that, arising out of the positive discussions with the Department of Education, that the subject lands are not required by the Department and that future additional educational requirements will be located within the remaining, extensive Terenure College lands.

A single access into the development is preferrable over two. The second entrance for set down/deliveries and servicing of the apartments should be omitted and facilitated via the main entrance.

- The proposed scheme has removed the secondary access point along Fortfield Road. The scheme now only has one vehicular access point to the northwest of the site.

Layout of the concierge, amenity areas etc may need to be revised also as a result.

- This area has been revised please see the enclosed architects' drawings (GP-101- Proposed site plan - ground floor) for the ground floor.

DCC Water Services require more information on surface water solution for the development.

- Please refer to the surface water drainage drawings prepared by PUNCH engineers submitted as part of this application. A proposal to alleviate the pluvial flooding on Fortfield Road has been developed and includes the provision of perforated gullies located at the low point on the road which will collect overland flow and convey it via a piped network to a surface water detention basic within the north-western corner of the site.

Acknowledge that upgrade works at Fortfield Road/College Drive junction will require parallel application with South Dublin County Council.

- A pre application consultation request has been submitted to South Dublin County Council on the 5th of March 2024. A response was received on the 29th May 2024 from SDCC . In line with the comments received a planning application to SDCC has now been submitted for the upgrade works at Fortfield Road / College Drive, Reg. Ref. SD24A/0268W. This is due for determination on the 10th February 2025. .

Planning reference	SD24A/0268W
Application type	Permission
Proposal	We, 1 Celbridge West Land Limited, intend to apply for Permission for developmen
Location/Address	College Drive and Fortfield Road, Terenure, Dublin 6W
Applicant's name	1 Celbridge West Land Limited
Registration date	06 Dec 2024
Decision date	
Decision	
Final grant date	
Appeal lodged date	
Appeal decision date	
ABP Reference	
Appeal decision	
Status owner	Registered
Proposal description	We, 1 Celbridge West Land Limited, intend to apply for Permission for development on this site of c.0.8112ha along College Drive and Fortfield Road, Terenure, Dublin 6W. The development will consist of road and water services upgrade works on Fortfield Road and College Drive. The
Appeal type	
Agent name (company)	McGill Planning Limited
Final date for third party observations/submissions	20 Jan 2024
Application date	06 Dec 2024
Decision due date	10 Feb 2025

Note Policy CUO25 and the need for 5% Community, Arts and Culture space

- The proposed development includes for a provision of 1,413.6sqm of community, cultural and arts facilities for residents and potential visitors, along with a creche of 100sqm with an associated 153sqm of outdoor space and then a further 301.3sqm of communal amenity space for residents only. This is in excess of this 5% required. The community, cultural and arts provision includes indoor
- A Cultural Infrastructure Impact Assessment was completed by Turleys Planning Consultancy and the provision of this space is in line with this advice.

Parking standard -Additional justification required having regard to public transport provision.

- Please refer to the traffic and transport reports submitted with this application prepared by PUNCH Consulting Engineers and the Public Transport Capacity Study prepared by Transport Insights.

6. Statement of Response to S32B Pre-Planning Meeting and DCC LRD Opinion

An LRD Meeting, planning authority reference LRD6058/23-S2, was held on the 5th of June 2024 via Microsoft teams. Following this LRD Meeting under section 32 of the Act, the council were required to provide an Opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

Following consideration of the issues raised during the LRD meeting the Planning Authority issued its Opinion on the 25th June 2024. This confirmed that the proposal *"requires further consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development."*

The Opinion went on to state that in the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by the following:

Items	Applicant's Response
Statement of response to the issues set out in the LRD opinion.	This section of the planning report provides a response to all of the items raised in the Opinion.
Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.	Section 8 of this planning report (below) addresses in detail the Development Plan policies and objectives and confirms that the application is consistent with the Development Plan.

The Opinion also stated that: "*Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the applicant is hereby notified that the documents submitted in relation to the following issues did not constitute a reasonable basis on which to make an application. The applicant is advised that these issues or areas must be addressed in any documents submitted in a future planning application, in order to constitute a reasonable basis on which to make an application".* Please refer to the table below for the applicant's response to the items raised in the opinion:

Items	Applicant's Response
The proposed application shall be accompanied by the following:	
1.) The description of development should set out in full the details of the proposed development, including the overall floor area, including the number of residential units per block, with a breakdown of unit types, and the number of storeys in each block, the number of car and cycle parking spaces proposed, and such other information as would be required in the public notices.	The development description, as set out in the public notices sets out in full the details of the proposed development.

2.) *Further details should be submitted in relation to how the proposal would comply with Policy CUO25 of the current Dublin City Development Plan, which requires a minimum of 5% of the <u>total floor area</u> to comprise community, arts and culture spaces, to include exhibition, performance, and artist workspaces predominantly internal floorspace. The details should include details of consultation with Dublin City Council's Arts Officer.*	Please refer to Ground Floor Plan dwg. no PP-101 prepared by Urban Agency. The requirement for this site is to provide 1,408.5sqm of space (5%). This drawing, along with the schedule of accommodation summary demonstrates that the proposed development provides 1,413.6sqm of Community, Arts and Culture floor space has been provided not including the creche. This includes 1,214.6sqqm of internal space at ground floor of Block A and B, 199sqm of external floor space to the south of blocks A and B. In addition to this a creche is also proposed which measures 100sqm with a 153sqm external play space. This addresses Policy *CUO25* and is above 5% of the total floor area of the development. In addition to this space provided a further 4 no. car spaces are provided in addition to this.
3.) *The following should be clarified:* a) *The Housing Quality Assessment should include details of how the proposal complies with the requirement for the majority of units to have floor areas of more than 10% of the minimum requirement in accordance with Section 3.8 of the Sustainable Urban Housing: Design Standards for New Apartments (Department of Housing, Local Government and Heritage, 2023).* b) *It is stated that the proposal provides for no more than twelve residential units per core per floor; however, this does not appear to be the case on examination of the drawings. The applicant should clarify how it is proposed to meet this requirement.*	Please refer to the HQA prepared by Urban Agency and is submitted as part of this application. This demonstrates that the proposal complies with the requirement for the majority of units to have floor areas of more than 10% of the minimum requirement in accordance with Section 3.8 of the Apartment Guidelines 2023. Please refer to the floor plans prepared by Urban Agency. The proposal provides no more than twelve residential units per core per floor.
4.) *The proposed application should submit details of how it is proposed to delineate the areas of communal open space from the public open space, while allowing each block to have one publicly accessible frontage to ensure that access can be provided to residents and visitors without compromising*	Please refer to the Landscape Design Statement prepared by NMP. This confirms that communal open spaces will be defined with a low 1.1m railing with gated access for residents only. The railing will be set within 1.1m high hedge to screen its impact visually. The low railing provides delineation for residents but also

the quality of the private spaces. The applicant should also consider the provision of privacy screening to the ground floor apartments on the western side of Block A.	offers visual permeability. Each block has core access through these spaces which will be controlled by way of access code pad / intercom for visitors. Along the western boundary of block A there is proposed planting adjacent to all of these ground floor apartments providing appropriate privacy screening to these three apartments. This is indicated on drawing no. L1 104 General arrangement sheet 1 of 6.
5.) *The proposed application should include full details in relation to the future management and maintenance of the public open spaces on the site, including the area adjoining the lake which is within the site boundary.*	Please refer to Section 2 of the Operational Management Plan prepared by GAA which details the management and maintenance of the public open spaces of the site, including the lake.
Conservation and Archaeology	
6.) *Dublin City Council's Conservation Officer recommends that the following items are addressed prior to lodgement of the application:* a) *Justification for the extensive removal of the historic demesne wall as proposed.* b) *Consideration should be given to omitting the removal of the historic demesne wall as proposed and allowing for more of the historic wall to be retained in situ, submitting revised plans, sections and elevations showing the retention of the majority of the historic demesne wall, with new gateways or limited openings to provide access and egress from the site.* c) *The applicant should submit conservation methodologies for the repair of the historic demesne wall and making good of the limited new opening to best conservation practice.* d) *Additional verified views should be provided, including* • *Verified views from the playing pitches to the south east, within the grounds of Terenure College with the 18th, 19th and 20th century college in the left foreground and the proposed development in the background to the right to clarify the potential visual*	Please refer to Drawing no. PP-700 'Boundary Wall Along Fortfield Road' prepared by Urban Agency Architects. This wall has been assessed by John Olley, Historic Landscape and Architect Consultant. He has identified that much of the wall in question has been altered over the last century with only a small section of wall along the south western boundary which may be original. As a result of his review, the amended proposal, in response to the opinion seeks to retain the majority of the wall but at a reduced height , with railings above the wall. By lowering the wall and providing a railing, this will enable permeability into the new public open space, providing limited openings where necessary while still marking the demesne boundary. The proposed wall design will provide an attractive frontage along Fortfield Road introducing planting along with intervisibility between the development and the main road creating better surveillance and much-needed active frontage in this location. The small area of original wall is proposed to be retained in full. With respect to the justification for the removal of the Demesne wall, as well as conservation methodologies for the repair and maintenance of the retained portions of the wall, please also refer to addendum to the 'Historical Landscape Assessment' report prepared by John Olly (April 2024), dated November 2024, prepared in response to the

impact on the special architectural character and setting of the College. • *Additional verified views from Fortfield Road looking towards the proposed site and Terenure College to clarify the potential visual impact of the proposed residential development on the special architectural character of the buildings of Terenure College when viewed from the west.* • *Verified views of the proposal from the park (Fortfield Green) at the corner of Fortfield Road and College Drive to clarify the visual impact of the proposed development on the setting of the houses on Greenlea Road.*	queries posed by Dublin City Council's Conservation Officer on same Please refer to the additional verified views prepared by Modelworks. Additional views from the grounds of Terenure College, Fortfield Road and from Fortfield Green have been included as well as additional views clarifying the impact of the proposed development on the setting of the houses on Greenlea Road as part of the planning application to clarify the visual impact of the proposed development. These clearly demonstrate the impact of the development appropriate to its location and its setting within Terenure College and will add to the visual interest in the area.
7.) Dublin City Council's City Archaeologist recommends that the following items are addressed prior to lodgement of the application: *a) An archaeological assessment will be required to be prepared as defined in Section 3.6 of the Framework and Principles for the protection of the Archaeological Heritage(1999), including test excavation, as described in Section 3.6.5 (see https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf). A report providing the results of the test excavation containing a detailed construction impact statement should be submitted to the planning authority to inform the archaeological site strategy.*	Please refer to the Cultural Heritage Impact Assessment prepared by Moore Group which includes the results of the test excavation.
Traffic and Transport	
8.) Dublin City Council's Transportation Planning Division recommends that the following items are addressed prior to lodgement of the application: *a) The applicant is required to consult with the NTA and Dublin Bus regarding the capacity of the urban bus services serving the application site. Relevant information regarding service capacity, including existing and planned bus priority measures along the relevant bus routes within the network, should be included in the planning*	Please refer to the 'LRD Opinion Summary Response' prepared by PUNCH Engineering Consultants in response to item number 8. Both the NTA and Dublin Bus have provided feedback with regard to item 8A. The design solution provides legibility and safety for vulnerable road users along Fortfield Road. A Quality Audit, including a Road Safety Audit was completed by Bruton Consulting Engineers. This has been submitted with the application.

application to inform the applicant's justification for the scale and density of development.	
b) The applicant is required to consult with Dublin City Council's Environment and Transportation Department and the NTA regarding the design of the 4-arm signalised junction, the proposed relocation and design of the bus stop on Fortfield Road and the increased footpath provision along the eastern side of Fortfield Road, a continuous minimum width of at least 2 m should be achieved.	
c) A Road Safety Audit should be carried out and made available to Dublin City Council's Environment and Transportation Department as part of the review of works proposed within the public road.	
d) A Letter of Consent is required from Environment and Transportation Department for works within the public road.	Please see the Letter of Consent from Dublin City Council enclosed in the appendices with this application.
e) With regard to the proposed works to the west side of the Fortfield Road / College Drive junction, on lands within South Dublin County Council, evidence of agreement for these works or confirmation of the planning application strategy for the works should be provided.	A separate planning application has been submitted to South Dublin County Council reg. ref. SD24A/0268W. This application is works to Fortfield Road/ College Drive junction to support this application as well as providing connection to the Irish Water/ Uisce Eireann network. The information submitted for the South Dublin County Council application is also enclosed with this application.
f) Pedestrian connection to Lakelands Park should be reconsidered as this would improve the wider connectivity of the area.	This is noted. However, the residents in the area are strongly opposed this proposal. A walkway close to this boundary is provided and can be installed at a later date should it be required. alternatively, Dublin City Council could request its provision by way of condition.
g) A robust rationale should be provided for the proposed locational designation of the application site in accordance with Table 3.8 and SPPR 3 of the 'Sustainable Residential Development and Compact Settlements' guidelines (2024).	Please see the Statement of Consistency below. Under the Compact Settlement Guidelines 2024, this site falls under the definition of City – Urban Neighbourhood as it is a residential area close to the city centre which has excellent access to a range of land uses given its proximity to Templeogue and Terenure. It is within walking distance of employment, education, retail and recreational uses. The site also falls within the definition of both a *High Capacity Public Transport Node or Interchange* and an *Accessible Location* due to the site's proximity to (within 500m) Bus Stop 1159 which serves bus routes 15, 49, 65 and 65B and have a 10 minutes service at peak times. As set out in Table 3.1 of

	these guidelines "*it is a policy and objective of these Guidelines that residential densities in the range **50dph to 250dph** (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.*"
h) A taking-in-charge drawing addressing the proposed junction and footpath widening on Fortfield Road is required.	Please see drawing no PP-800 prepared by Urban Agency which indicates the areas to be Taken in Charge. The only new area proposed to be Taken in charge is to the north west corner of the site to provide pluvial flood mitigation measures.
i) All pedestrian and cycle paths should demonstrate compliance with the relevant design standards of DMURS. All internal pedestrian access routes to Blocks should achieve a continuous minimum width of at least 2m. Where shared cycle and pedestrian access routes are proposed, it should be demonstrated that the proposed width can safely and comfortably accommodate shared use.	As confirmed by the PUNCH Consulting Engineers DMURS statement the proposed development is fully compliant with DMURS. All pedestrian routes comply with the requirement for 2m. All shared routes are appropriately sized to ensure that they uses can be accommodated comfortably.
j) The following is required to further clarify and improve cycle parking proposals: *i. It should be demonstrated that access corridors, aisles and doors providing access to resident cycle parking achieve adequate widths, in compliance with the relevant design guidance of the NTA's 'Cycle Design Manual, 2023'.* *ii. The design of the visitor cycle parking provided at surface level and the quantity provided in each bank of standard should be specified.* *iii. The quantity of cycle parking spaces capable of accommodating non-standard cycle equipment (e.g. cargo bikes) should be increased. NTA's 'Cycle Design Manual, 2023' recommends 5%. The additional spaces should serve both residents and visitors and should be dispersed throughout the site.* *iv. Provision for e-bike charging facilities should be demonstrated.* *v. Staff cycle parking in a secure facility is required for the culture/arts space, in accordance with the relevant standards of Table 1 of Appendix 5 of the City Development Plan. This facility and the residential cycle parking facilities should be accessed separately.*	Please see the PUNCH Consulting Engineers Opinion Response. All cycle parking facilities are fully in accordance with the NTA's Cycle Design Manual 2023. All drawings clearly indicate the quantity of cycle parking in each bank. 5% of all bicycle spaces are provided as non-standards spaces to accommodate larger bicycles. E-bike charging facilities are provided. Staff parking for the creche and cultural and arts spaces are also provided.
k) Discrepancies in the submitted drawings and documentation are noted, in particular in respect of the quantitative figures for car parking	All figures have been updated and fully co-ordinated.

provision. The final application submission should be consistent.	
l) The following is required to further clarify and improve car parking proposals: *i. It should be demonstrated that sufficient clear space is provided to accommodate one in-curtilage car parking space per house only, with suitable design measures (e.g. landscaping) provided to prevent additional parking encroachment.* *ii. Review access to car share and consider relocating some spaces to surface level to benefit the dwelling units and public access.* *iii. Visitor allocation appears excessive and should be reviewed. Information on the management of visitor spaces are required.*	Please see the site layout drawings. This clearly indicates that there is only one car parking space for each house. Appropriate landscaping is also included to prevent additional parking. All car share spaces are now at surface level. Visitor parking has been reduced and additional parking has been provided for the newly included creche space and the cultural and arts space.
m) Proposed phasing of works within the public road is required due to proposals to use the new access point as the main site access during construction.	The proposed development will be in a single phase.
Drainage	
9.) Dublin City Council's Drainage Division recommends that the following items are addressed prior to lodgement of the application: *<u>Flood Risk</u>* • *Clarity needed around model; evidence that modelling carried out correctly. Pluvial risk has been identified and proposal aims to address risk from 1%AEP pluvial via storage pond – how was this sized/the volume derived for this event?* • *Protection to basement level – confirm and provide detail.* • *Provide map of development indicating pre- and post- development extents for 1%AEP and 0.1%AEP, including depths. Need to demonstrate that FFLs and access points are suitably protected. DCC need to be satisfied that pluvial risk has been sufficiently addressed.*	All items raised in item no. 9 are addressed within the Engineering reports prepared by PUNCH Consulting Engineers. Please see the Site Specific Flood Risk Assessment by Punch Consulting Engineers. This includes hydraulic testing. As a result of the pluvial flood risk on Fortfield Road a storage area has been provided on the application site. This addresses the risk of pluvial flooding and indeed improves the existing situation on Fortfield Road. The Site Specific Flood Risk Assessment confirms there is no risk to the basement level. A Basement Impact Assessment is also provided demonstrating that it will not have an impact on the wider area. This is included within the PUNCH Consulting Engineers documentation.
<u>Engineering Services Report</u> • *Clarity needed regarding design approach and calculations; inconsistencies within Report and some further detail/explanation is necessary.*	This has been addressed in full within the PUNCH Consulting Engineers reports. All calculations are consistent throughout. Please see the Taking in Charge map. This clearly indicates the area in the north west of the site to be taken in charge by DCC.

• *Query Taking in Charge proposals – confirm exact boundary between private and public. New infrastructure proposed to manage public road run-off however this would be draining to privately-maintained infrastructure (storage pond)? DCC would not generally accept such an arrangement. Further discussion and detail is necessary on this aspect. The use of SuDS should be explored for any carriageway junction works.*	
Basement Impact Assessment (BIA) • *A preliminary check suggests revisions are required, e.g. text missing/incorrect, no assessment has been carried out under the Land Stability and Ground Movement section – contains the construction plan from a later section.*	A revised Basement Impact Assessment has been completed. This has been reviewed with DCC prior to the submission of this application to ensure all aspects required are addressed in full.
Consultation with Drainage Planning is highly recommended to ensure all surface water management matters are addressed prior to lodgement of any planning application	PUNCH Consulting Engineers have consulted with the Drainage Planning Department. Please see the enclosed response from Punch.
AOB	
10.) The applicant should note that an updated Natura Impact Statement should be submitted for the proposed development.	An updated Natura Impact Statement by Altemar Marine and Environmental Consultancy has been submitted with this application for the proposed development.
11.) In order for the proposed development on Z15 lands to be considered, the applicant should submit a letter from the Department of Education confirming that the site is no longer required for educational purposes. The applicant should also submit a letter from the owners of the site stating that they no longer require the site for educational purposes	The applicant has been in ongoing positive discussions with the Department of Education, along with the Carmelites in relation to future educational requirements to be located on the remaining lands within Terenure College. Please refer to the letter from the Carmelites which confirm that they are *"in active dialogue with the Department of Education regarding accommodating their potential future educational requirement in the south Dublin City area within the significant landholding of Terenure College."* The applicant letter also submitted confirms the same. Therefore, the land, the subject of this application is not required for current or future educational purposes and is available to suitable residential development and associated uses as proposed.

7. Statement of Consistency (Planning Policy Review)

This section provides an overview of national, regional and local planning policy which are relevant to this development.

National and Regional Planning Policy

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *Project Ireland 2040 - National Planning Framework (2018) ("**NPF**");*
- *Project Ireland 2040: National Development Plan (2018-2027) ("**NDP**");*
- *Regional Spatial and Economic Strategy 2019- 2031 ("**RSES**");*
- *Dublin City Development Plan 2022-2028 ("**DCDP**");*
- *South Dublin County Council Development Plan 2022-2028 ("**SDCCDP**");*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018) ("**Building Height Guidelines 2018**");*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023) ("**Apartment Guidelines 2023**");*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022) ("**Apartment Guidelines 2022**");*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2020) ("**2020 Apartment Guidelines 2020**");Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) ("**Sustainable Residential Development in Urban Areas 2009**") (revoked) and the accompanying Urban Design Manual: A Best Practice Guide (2009) ("**Urban Design Manual**");*
- *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) ("**Compact Settlement Guidelines 2024**");*
- *Delivering Homes, Sustaining Communities (2007) ("**DHSC 2007**");*
- *Quality Housing for Sustainable Communities (2007) ("**QHSC 2007**");*
- *Design Manual for Urban Roads and Streets (2013) ("**DMURS**");*
- *Guidelines for Planning Authorities on Childcare Facilities (2001) ("**Childcare Guidelines 2001**");*
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) ("**Planning System and Flood Risk Guidelines 2009**");*
- *Site layout planning for daylight and sunlight: a guide to good practice (2022) ("**BRE Guide 3rd Edition**");*
- *Rebuilding Ireland – Action Plan For Housing And Homelessness 2016 ("**Rebuilding Ireland Plan 2016**");*
- *Transport Strategy for the Greater Dublin Area 2016-2035 ("**Dublin Transport Strategy 2016-2035**")*
- *Greater Dublin Area Transport Strategy 2022-2042 ("**Dublin Transport Strategy 2022-2042**");*
- *Housing for All – A New Housing Plan for Ireland (2021) ("**Housing for All Plan**");*
- *Climate Action Plan (2021) ("**CAP 2021**").*

Project Ireland 2040 Our Plan - National Planning Framework (2018)

The NPF is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland within the next 20 years. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following planning aims to guide the delivery of this growth:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- 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.

Overall, the NPF seeks to avoid continued, untrammelled urban sprawl of our cities into greenfield areas. Compact Urban Growth is the NPF mantra, "*making better use of under-utilised land and buildings, … with higher housing and jobs densities, better serviced by existing facilities and public transport."*

This approach not only makes better use of serviced zoned land, but it can also have a "*transformational difference*" to urban locations bringing new life and footfall to areas and contributing to the viability of services, shops and public transport, increasing the housing supply, and enabling more people "*to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less*" (section 2.6).

The NPF enables a flexible approach to planning policies and standards requiring developments to be "***focusing on design led and performance-based outcomes,*** *rather than specifying absolute requirements in all cases… planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes*."

In particular Section 4.5 highlights that "***general restrictions on building height or universal standards for car parking or garden size may not be applicable*** *in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.*" It highlights that there "***should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five."***

The NPF also states that 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"*. Key National Policy Objectives (NPOs) outlined in the NPF which are directly relevant to this site and development proposal are set out below:

> *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 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.

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 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.

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 35

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

EVALUATION OF CONSISTENCY WITH NPF

The subject site is located within a suburban location south of Dublin City, which is identified for significant residential growth over the next two decades.

The proposed development seeks to deliver a significant quantum of residential development at a site that is located within a well-established area, and which is within walking distance of a multitude of services, exceptional public transport options and very good local amenities. The proposed apartment development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced suburban area.

The site is well connected to excellent public transport services. The site is within 500m of multiple bus stops with several bus routes serving these stops. This includes high frequency bus routes. The site also benefits from the proposed F1 BusConnects route which will run along Fortfield Road and the proposed A1 and A3 BusConnects routes which will Templelogue Road which will further improve services in this location .

The subject site has excellent access to a range of retail facilities owing to its central location. Terenure village is located c.15-minute walk from the subject site providing the site with access to commercial hubs with a variety of services including large supermarkets, clothing stores, shops, restaurants, take aways and pubs. The subject site is also within 15-minute walk from Templeogue Village, allowing future residents to benefit from a range of additional services.

In addition to the public space provided within the scheme, the site is located within 10-minute walk of Bushy Park and within a 20-minute walk of Rathfarnham Castle Park, with additional parks and walks located in the wider area.

The proposed development will provide for a high-quality residential scheme through the design and the materials and finishes proposed. In addition, the proposed apartments meet and exceed the minimum apartment size requirement as stated in the Apartment Guidelines, as demonstrated below in the Statement of Consistency with Relevant Section 28 Guidelines. The proposed housing meet and exceed the QHSC 2007. The proposed development of houses and apartments in this location will provide greater variety in the type of house types in this location as well as providing an increased density, while enabling the delivery of the aims of the NPF to meet the demand for housing.

There is a strong emphasis towards increased building heights and densities in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height is in line with government guidance and emerging trends for sustainable residential developments.

Development of these lands is considered to be fully in accordance with the recommendations of the NPF.

Rebuilding Ireland – Action Plan For Housing And Homelessness 2016

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

EVALUATION OF CONSISTENCY with Rebuilding Ireland Plan 2016

The proposed development is consistent with Pillar 3 to build more homes at appropriate urban locations. The proposed development provides for 265 no. apartment units and 19 no. housing units. This will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, local retail, recreational and associated social infrastructure.

Regional Spatial And Economic Strategy 2019-2031

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES for the Eastern and Midland Region was adopted in 2019 and is a strategic plan and investment framework to shape the future development of this region to 2031. The vision for the region is to "*create a sustainable and competitive Region that supports the health and wellbeing of*

our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all."

The RSES will support the implementation of the NPF and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The RSES identifies that the Dublin Metropolitan Area is "*to realise ambitious compact development targets at least 50% of all new homes within or contiguous to the existing built-up area in Dublin and at least 30% in other metropolitan settlements.*" Dublin city and its suburbs are at the top of the settlement hierarchy for the region in terms of the need to ensure highly concentrated development in this highly accessible and serviced area.

Table 4.2 Settlement Hierarchy

Settlement Typology	Description	Areas		
		Metropolitan	Core Region	Gateway Region
Dublin City and suburbs	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.	Dublin City and suburbs		

Figure 25: 'Settlement Hierarchy' Table 4.2 of Chapter 4 of the RSES 2019

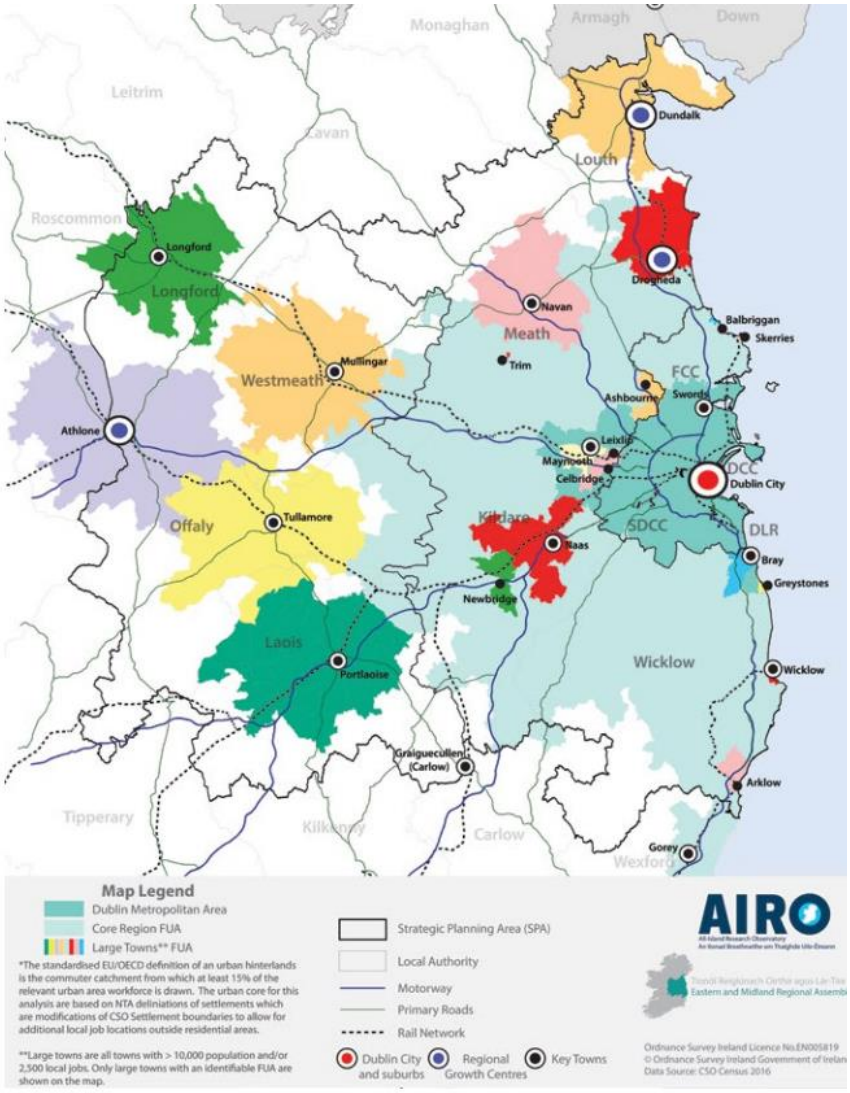

Figure 26: 'EMRA Functional Urban Areas, 2016' Figure 1.9 of Chapter 1 of the RSES 2019

Figure 27: 'Public Transport Network 2027', Figure 5.4 of Chapter 5 of the RSES

Section 4.4 of the RSES identifies that in order to achieve compact growth 50% of housing needs to be provided within or contiguous to the build-up area of Dublin City and suburbs. To achieve this the Metropolitan Area Strategic Plan identifies strategic residential and employment corridors along key public transport corridors, both existing and proposed.

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

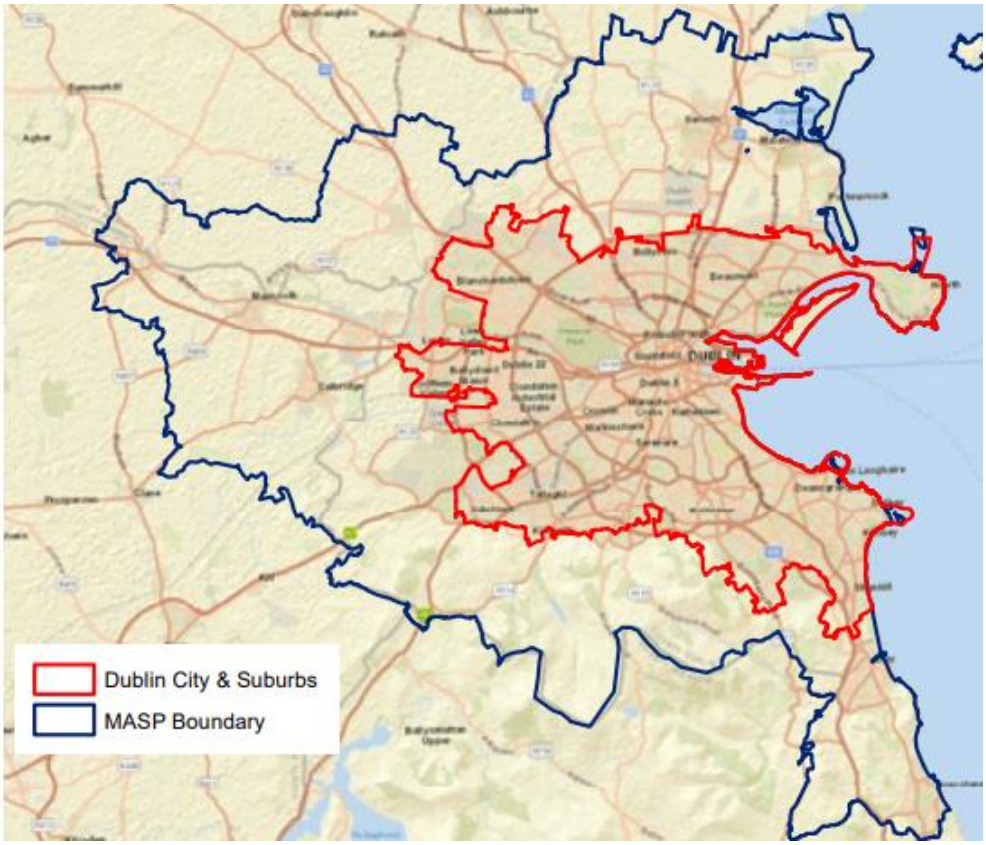

Figure 28: 'MASP Boundary Source', Figure 5.1 of Chapter 5 of the RSES 2019

The guiding principles for growth in the Dublin Metropolitan area are set out in section 5.3 RSES and include

- *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 to 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.*
- *Metropolitan Scale Amenities – To enhance provision of regional parks and strategic Green Infrastructure, to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast, as part of the implementation of the National Transport Authorities' Cycle Network Plan for the Greater Dublin Area.*
- Enhance co-ordination across local authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.

Figure 29:'Dublin Metropolitan Area Strategic Plan', Figure 5.2 of Chapter 5 of the RSES 2019

EVALUATION OF CONSISTENCY with RSES

The subject development seeks to provide for significant residential development on a suburban infill site within the highly accessible location of Terenure. The proposed development complies in principle with the locational and quantitative policies and objectives of the RSES.

Fortfield Road and Templeogue Road has access to high quality public transport including excellent high frequency bus services. It has excellent potential to promote sustainable mobility and achieve the vision of 'walkable' communities. The site is therefore considered appropriate for development to help with the consolidation of the area and to avoid further sprawl.

The proposed development will help to encourage a modal shift away from private car usage to more sustainable travel. The site is also in close proximity to a variety of public transport options which will help to encourage a modal shift away from car dependency and car ownership. The proposed development will benefit from its location close to significant social infrastructure and employment opportunities within walking/cycling distance or accessible by public transport. These existing destinations in the area will support the '10 minute' settlement concept promoted by RSES.

It is submitted that the proposed development is in line with the principles of the NPF and the RSES.

Urban Development & Building Heights: Guidelines For Planning Authorities, 2018

The Building Height Guidelines 2018 set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the NPF. There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.

SPPR 1 of the Guidelines state the following:

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.

The imposition of height or numerical restriction at the subject site would therefore be contrary to Specific Planning Policy Requirement 1 which notes that blanket numerical limitations on building height shall not be provided for through statutory plans.

Section 3.1 of the Guidelines go on to 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 our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Section	Evaluation of consistency
• *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*	The proposed development seeks to deliver a significant residential development at a site that is highly accessible in terms of public transport due to is relation to a high frequency Dublin Bus transport corridor and centrally located in relation a number of employment and retail centres. This development is considered to be in line with the Development Plan which encourages increased heights and density subject to meeting the criteria set out in Appendices. Please refer to the assessment of 'Appendix 3, Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density, and Scale' from the DCC Development Plan, included in the statement of consistency later in this document. These criteria reflect the Building Height Guidelines 2018.
• *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*	
• *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant*	

plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?	There is also excellent pedestrian and cyclist links with the adjoining urban areas. We note that the proposed development secures the NPF objectives as discussed in the section above under 'National Planning Framework' This proposal is fully in accordance with the Building Height Guidelines 2018 and the NPF.

SPPR 3 of the Guidelines state:

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.

The Development Management criteria are assessed in greater detail below:

Development Management Criteria	Evaluation of Consistency
At the Scale of the Town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	As set out above, the site is well connected with public transport services, with multiple bus stops within 500m of the site including high frequency bus routes which run every ten minutes. This connects the site to the wider Dublin area including Tallaght, and the city centre. This will also be further enhanced as a result of BusConnects. It is therefore in accordance with this objective.
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 and 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.	The proposed development seeks to deliver an appropriate form and scale of residential development at a site that is well connected to several different existing centres including Terenure, Templeogue and Rathfarnham Shopping centre. All of which provide a range of shopping, public houses, restaurants, shops and other facilities, services, and recreational uses. These are all within a kilometre of the site.
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 proposed development comprises 4 apartment blocks, which range in height from three to six storeys, ascending in a west to east transition. 19 no. houses are proposed ranging from two to three storeys in height and act as a buffer between the row of houses fronting Greenlea Road and the proposed apartments.

	Block A is located along the western boundary of the site. It is 3 storeys at the northern end rising to 4 storeys to the south, adjacent to Terenure College. The reduced building height at the northern boundary responds positively to the proposed 2-3 storey houses along the northern boundary. Block A is the longest building proposed on the site. Blocks B is located centre west of the site and is linked to Block A by a single storey community space. Block B is 4 storeys at the northern end rising to 5 storeys at the south of the site. Block C is located centre east of the site and is 4 storeys to the north of the site and 5 storeys to the south of the site. Block D is located along the eastern boundary of the site and is the tallest block. It is rising from 5 storeys at the northern end to 6 storeys to the southeastern corner of the site. The variation in the height, the use of materials and the stepping/ layout of the buildings, in particular the variegated roof profiles provides a visually interesting development which responds to the heights of the surrounding area. The development also introduces a new public open space to the southeast of the site to a unique mature woodland and lake which has been landlocked to date.
At the Scale of the Neighbourhood	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	The proposed development has been carefully designed to respond to the existing situation surrounding the site, as well as Terenure College to the south. It also aims to protect and enhance the existing mature woodland and lake. The stepping of the buildings from the north to south reflects a need to transition from the existing two storey residential development which surrounds the site to the north, east and west. The positioning of attractive 2 to 6 storey building along the boundary, interspersed with gaps between the buildings provides an attractive urban approach when viewed from Fortfield Road replacing a view which is currently dominated a 1.8m solid concrete blank wall. The balancing of these elements has created a development that is considered and is a positive contribution to the area and providing an attractive

	development that steps appropriate to meet the neighbouring properties.
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 proposed apartment blocks are broken into four buildings, which step in height to meet the neighbours. The size and shape of all of the blocks, along with the variation in height, and use of materials have been chosen to ensure an attractive interesting development. Block D have been shortened, and the building footprint has been stepped to provide a more visually interesting development when viewed from the west. As a result of this change there are not unduly long, monotonous building lines.
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 introduces a new public open space to the south of the site. Furthermore, the scheme allows access to a mature woodland and existing lake which has been landlocked up to now. This scheme has been carefully considered to be designed to provide the most accessible public open space that has a relationship with the surrounding residential areas.
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 proposed building height, which steps down to meet the neighbours, is designed to be slightly higher than the immediate surrounding area but not to be a dominant feature on the skyline. It will only be visible from the immediately surrounding road, and further afield it will blend in with the roof line of the surrounding area. This is not a highly visible site; it can only be seen from the access road from Fortfield Road and as such is considered a back land or infill development to the rear of Terenure College and is considered appropriate to maintain this approach and will not be readily visible from the wider area. It will integrate into the surrounding urban landscape in a seamless manner. The proposal provides a mix of communal and public open spaces throughout the scheme with ease of access for all residents.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The proposal will significantly improve the mix of residential types in the area which is dominated by two storey housing. The proposal comprises of a mix of unit types including 10 no. studios, 117 no. 1 beds, 129 no. 2 beds, 9 no. 3 beds, and 19 no. 4 beds. The provision of these units, in a largely two storey housing area will enhance the unit typologies currently available in the area.
At the scale of site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight,	The layout and design of the buildings and the gaps between them have been orientated and designed to ensure the maximum amount of natural daylight,

ventilation and views and minimise overshadowing and loss of light	ventilation and views within the development while also ensuring there is no loss of light or overshadowing to the existing neighbours.
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.	OCSC Engineering Consultants have completed a Sunlight Daylight Analysis. As discussed above in the report, this analysis demonstrates 100% compliance rate has been achieved in terms of internal daylight of the worst-case scenario spaces selected for analysis when compared with the BRE Guide 3rd Edition. The proposed open space is also entirely in compliance with BRE Guide 3rd Edition with all of the communal/public open space receiving more than 2 hours of sunlight or between 76% and 100% of their areas on March 21st.
Specific Assessments	
Specific impact assessment of the micro-climatic effects such as downdraft. 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.	OCSC have carried out a Wind/Microclimate study. This has found that the proposed development will have an acceptable microclimate.
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.	Please refer to the appendices of the EcIA prepared by Altemar which includes a Bat Fauna assessment, a Winter Birds Survey 2022-2023,2023-2024 and a Breeding Birds Survey 2023 & 2024.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The proposal will not alter the existing telecommunication channels in the area.
An assessment that the proposal maintains safe air navigation.	The subject site is not within a flight path and is therefore not expected to impact air navigation.
An urban design statement including, as appropriate, impact on the historic built environment	A detailed Design Statement prepared by Urban Agency Architects which demonstrates that this development is appropriate to its context and will not have a detrimental impact on the wider area or indeed the historic built environment.

	A Historic Landscape Assessment and a Cultural Heritage Impact Assessment has been submitted with this application that there is a limited potential the development will impact on subsurface archaeological monuments, and that the proposal will have localised impacts on setting. Furthermore, the historical landscape report concludes that the development of this site adds to the immediate surroundings with its intense landscaping proposals.
Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.	The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites. We refer to the AA Screening, NIS, EcIA and CEMP prepared by Altemar submitted with this application.

We note the following compliances with the SPPRs of the Guidelines:

Specific Planning Policy Requirement	Evaluation of Consistency
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.	The site is well connected to good public transport services. The site is served by 5 bus routes, many of which are high frequency connecting the site to Dublin City Centre, Trinity College, Grand Canal Dock, Citywest and Tallaght. It is also within walking and cycling distance of a range of amenities, universities, and employment areas. Therefore, the site represents an "Central and Accessible Urban Location" as defined in Section 2.4 of the DSNA and is suitable for higher density apartment development.
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	The proposed development provides for a housing scheme and apartment development along with a new public open space. It is located within 1km of a wide range of commercial, retail and education facilities.
SPPR 3 It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development	The proposal is in accordance with the Development Management Criteria as set out in the table above.

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.	This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.

Evaluation of Consistency

The proposed development is located on an infill site within Terenure, a suburban area of Dublin city, which is served by high quality bus transportation. In addition, there are several neighbourhood centres within a short walk of the site. Therefore, the subject site is considered an appropriate site for increased building heights in line with the Building Height Guidelines 2018.

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines 2018*. The application proposes a development principally ranging in height from 2 to 6 No. storeys.

The proposed development will integrate appropriately with the surroundings, having regard to the location of the subject site within an existing built-up area in Terenure, close to Terenure Village, Templeogue and Rathfarnham Shopping centre. It is well served by public transport and in proximity to employment locations, services and facilities. The set back of the building and the stepping height results in the buildings only be visible from the immediate area, but from further afield being lost within the roofscape.

It is our opinion that the subject site is capable of and appropriate for additional height and density having regard to the introduction of the NPF and the *Building Height Guidelines 2018* which encourages increased height and density in highly sustainable and underused sites such as these. The proposed development has been designed to ensure the protection and amenity not only of future occupants of this development but also those of the existing residents in the adjacent properties. To this end the highest elements have been located furthest away from existing residents at the least sensitive locations within the subject site.

Guidelines For Planning Authorities on Sustainable Residential Development In Urban Areas, 2009

The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas. It is noted that the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024 replaces this document. However, the companion non-statutory Design Manual has not yet been published, as a result as these guidelines for Sustainable Residential Development in Urban Areas is supported by the Urban Design Manual 2009, it was deemed appropriate to retain this guidance within this Statement of Consistency.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

	EVALUATION OF CONSISTENCY
Prioritise walking, cycling and public transport, and minimise the need to use cars;	Pedestrian and cyclist access to the site has been prioritised with minimal vehicular access to the site. Please see the Traffic Impact Assessment prepared by PUNCH enclosed with this application.
Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;	The scheme has been designed in accordance with all relevant quantitative and qualitative residential standards as set down in the Dublin City Development Plan. Future residents will live in a uniquely safe residential environment with outdoor space largely free of cars and a multitude of access options to social infrastructure, open spaces and public transport in the area.
Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;	The development will consist of housing and apartments with residential facilities. These units have a range of community facilities including a large community garden, roof gardens and also communal facilities within block A and B for the use of residents. It also provides a new public open space including a mature woodland and lake. The development is well located in relation to existing/planned social infrastructure in the area with schools, creches, and local retail within c. 10 minutes' walk.
Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;	The layout of development has been designed to enhance the accessibility of the site. All of the routes through the development will provide increased connectivity to the area which is well surveilled and overlooked. The public realm proposed is high quality with a range of different spaces meeting varying needs throughout the development.
Are easy to access for all and to find one's way around;	There is one vehicle access into the site off Fortfield Road to the west which also provides cyclist and pedestrian access. The layout is logical, interesting and wayfinding uncomplicated.
Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;	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.
Provide a mix of land uses to minimise transport demand;	The proposed development provides apartments and houses. Support services in terms of the residential facilities with high quality outdoor spaces are also provided. The scheme is within c. 10 minute walk of a wide range of high frequency bus services. It is accessible to a variety of existing facilities and employment opportunities in the area.
Promote social integration and provide accommodation for a diverse range of household types and age groups;	A range of unit sizes is proposed for the scheme including studios, 1 and 2, 3 and 4 bedroom apartments and 4 bedroom houses. This will improve the overall mix in the wider area which comprises a large proportion of 3+ bed houses at present.

Enhance and protect the green infrastructure and biodiversity; and	The site comprises an infill site including a mature woodland and lake which has been landlocked up until now. The proposal will open up this area as public open space to enhance the green infrastructure network in the wider area. The ecology reports and proposed landscaping plan sets to protect and enhance the biodiversity on the site.
Enhance and protect the built and natural heritage.	The proposed development does not have any protected structures on the site. A Historic Landscape Assessment and a Cultural Heritage Impact Assessment has been submitted with this application that there is a limited potential the development will impact on subsurface archaeological monuments, and that the proposal will have localised impacts on setting. Furthermore, the historical landscape report concludes that the development of this site adds to the immediate surroundings with its intense landscaping proposals.

Urban Design Manual – A Best Practice Guide, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
	EVALUATION OF CONSISTENCY
The development seems to have evolved naturally as part of its surroundings.	The proposed development accords with the zoning objectives of the DCC development plan to provide for residential development. This development naturally evolves with its residential surroundings as a result of its close proximity to public transport facilities. The proposed scale and layout of development now proposed seeks to further exploit these natural assets to create a highly attractive residential development that at the same time optimises the return on zoned and serviced land so close to high quality and highly efficient public transport and planned services. Please refer to the local planning policy assessment for more information on how the proposed development accords to the zoning.
Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.	The proposed density is in accordance with National Planning Policy which encourages the site to make the best use of zoned land. The context of the site makes it particularly suitable for higher density residential development given the proximity to the City Centre, frequent bus services, services and employment centres within Terenure and Templeogue Villages.
Form, architecture and landscaping have been informed by the development's place and time.	

	The site is unique in its context which has remained vacant despite the suburbanisation of the wider area. The proposed heights step up to six storeys to respect and integrate with the existing houses to the north, west and east of the site. The proposal reflects the significant increases in densities and scale achieved along high-quality public transport corridors such as Dublin Bus Routes. The proposed development also reflects national policy for consolidated urban development and higher densities and scale on accessible and well serviced urban sites throughout Dublin City as promoted in the NPF and the RSES. The current proposal is a residential development that is modern not just in terms of design and density but also in terms of promoting an attractive living environment with significant and safe open spaces for future residents.
The development positively contributes to the character and identity of the neighbourhood.	The proposal is a striking design and layout which optimise this large infill site and will enhance and develop the character of this residential area. It will remove a vacant, underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.
Appropriate responses are made to the nature of specific boundary conditions.	The development has been designed with regard to the existing boundary features, particularly the siting of the development to create a scenic public open space to include the existing lake and mature woods.

2. Connections – How well connected is the new development	
	EVALUATION OF CONSISTENCY
There are attractive routes in and out for pedestrians and cyclists.	The development is connected directly to Fortfield Road. The landscaping of the site provides for route which run between the proposed apartment blocks allowing for greater permeability for residents around the site within a car free environment.
The development is located in or close to a mixed-use centre.	The scheme will be located within a 10 minute walk of local services located in Templeogue Village, a 13 minute walk

	to Terenure Village and a 15 minute walk of Rathfarnham Shopping Centre.
The development's layout makes it easy for a bus to serve the scheme.	The site is less than 0.5km from multiple existing bus routes in the area. BusConnects is also proposed within the locality. The proposed development, with its pedestrian linkages enables easy access to these routes and for the development to avail of existing bus routes in the area.
The layout links to existing movement routes and the places people will want to get to.	Dedicated and safe pedestrian/cyclist permeability through and around the site is enshrined in the specific design and layout proposed.
Appropriate density, dependent on location, helps support efficient public transport.	The density accords with national guidelines which promote higher density development in established residential areas close to high quality public transport and local services. The lower levels of private car parking within this scheme also enables this development to support the efficient use and maximise the sustainable use of public transport.

3. Inclusivity – How easily can people use and access the development?	
	EVALUATION OF CONSISTENCY
New homes meet the aspirations of a range of people and households.	The existing residential units are predominantly large family houses. The proposed scheme will overall improve the mix of units on offer with 90% of the scheme being made up of studios, 1 beds and 2 beds. The remainder of the scheme is made up of 3 and 4 bed units. The improved housing mix will facilitate a wider range of homeowners including individuals, couples, small families and empty nesters.
Design and layout enable easy access by all.	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.	The scheme will provide a variety of open spaces, public, communal and private amenity spaces for a range of different ages including children, adults and the elderly.
Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.	The open spaces will be publicly accessible. Crossings to these spaces will be denoted by a change in the landscaping and also through the provision of boundary walls/ fences.

New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.	The layout presents attractive urban edges to the open spaces proposed that will be supervised and overlooked.

4. Variety – How does the development promote a good mix of activities?	
	EVALUATION OF CONSISTENCY
Activities generated by the development contribute to the quality of life in its locality.	The proposal will provide for a much more sustainable housing mix within the area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development.
Uses that attract the most people are in the most accessible places.	A variety of open spaces are provided throughout the scheme and will be easily accessible to residents and the public.
Neighbouring uses and activities are compatible with each other.	The area is characterised by residential uses; as such the proposed use is compatible with the surrounding area.
Housing types and tenure add to the choice available in the area.	A variety of apartments and housing typologies are provided which will further improve the range of unit types in the area available to various household types. Please refer to the accommodation schedule for more information.
Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.	The scheme provides 1413.6 sqm of community, culture and arts space which will contribute to services on offer in the local area. The scheme will be located within 15 mins walk of local services located in Terenure Village, Templeogue and Rathfarnham Shopping Centre.

5. Efficiency - How does the development make appropriate use of resources, including land?	
	EVALUATION OF CONSISTENCY
The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.	The overall density is considered appropriate for this site given the proximity to public transport and social infrastructure.
Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.	The restriction on parking enables more landscaping. As a result, significant public open space will be provided across the entire scheme incorporating SuDS, promoting biodiversity and providing residential amenity.

Buildings, gardens and public spaces are laid out to exploit the best solar orientation.	63% of the units across the scheme are dual aspect which is in excess of the minimum standard required for developments within Central and Accessible Urban Locations and also Intermediate locations which require 50% under the Apartment Guidelines which requires 33%. All units and open spaces will enjoy sufficient sunlight and daylight provision. This is further demonstrated by the Daylight Sunlight Report
The scheme brings a redundant building or derelict site back into productive use.	The site is an underused area formerly associated with the now closed primary school on site.
Appropriate recycling facilities are provided.	Communal recycling facilities are provided in the bin stores strategically located proximate to each apartment block. Each house has its own bin facilities.

6. Distinctiveness - How do the proposals create a sense of place?	
	EVALUATION OF CONSISTENCY
The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.	The new public park incorporating the existing lake and woodland area will provide a high quality open space where the wider community will congregate and recreate. The provision of community and cultural uses at the ground floor of block A and B will result in ownership of the area by the wider community rather than just the residents, creating an interesting and exciting place to visit.
The scheme is a positive addition to the identity of the locality.	The site is currently a vacant site. The proposal will provide an appropriate scale and quantum of residential development on a key site directly adjoining efficient public transport.
The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	The topography including the surrounding residential and institutional buildings have all been considered with the design of the proposed development and its response to the surrounding area in scale and height. The proposed layout adapts to the site boundaries and existing buildings surrounding the site. The proposed buildings have been strategically designed within the site in order to reduce their impact on the landscape and character of the area whilst placing a focus on enhancing the density of the site. The buildings vary in height between two and six storeys with lower heights in close proximity to existing buildings and increased heights to the south of the site. The apartment buildings are placed to enclose the public and

	community open spaces ensuring that these spaces are overlooked by the proposed dwellings. The buildings are laid out to allow optimum light penetration into the spaces whilst the blocks also have views onto open spaces throughout the development.
The proposal successfully exploits views into and out of the site.	The proposal will introduce new views into the site that is currently blocked off from public access by a 1.8m concrete wall. The spaces between the blocks create an open and visually permeable development. This maintains view to, though and from the site. The height and design of the buildings will result in an attractive, legible route though the site, making way finding easy.
There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.	The public open space upon entering the site will be the focal point to the overall development. It creates an amicable first impression to visitors upon arrival and opens the space to integrate with lands zoned as recreation and amenity in to the area.

7. Layout - How does the proposal create people friendly streets and spaces?	
	EVALUATION OF CONSISTENCY
Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.	Pedestrian permeability across the scheme and connecting the currently landlocked lake through to the public open space is a key outcome.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	The apartment and housing scheme provides frontages that contributes to passive surveillance of the public open spaces within and external to the scheme along pedestrian access paths. The design and shape of the apartment blocks also encourages multiple viewpoints of the open space to the rear, ensuring the passive surveillance is achieved. Car parking spaces are provided mainly at basement level. A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted to ensure a predominantly car free environment.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	
Traffic speeds are controlled by design and layout rather than by speed humps.	
Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.	The open space strategy for the scheme creates multiple open spaces of varying uses and sizes. This can be seen in the landscaping strategy by NMP Landscape Architects.

8. Public Realm - How safe, secure and enjoyable are the public areas?	
	EVALUATION OF CONSISTENCY
All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.	All spaces are well distributed and overlooked and surveilled by surrounding apartment blocks.
The public realm is considered as a usable integrated element in the design of the development.	Creation of a mainly car fee public realm for pedestrians and cyclists to traverse unhindered is a key design outcome and will create a unique residential development in this part of the city. The landscaping and design of the public realm can be solely dedicated to providing the optimum amenity for residents and visitors.
Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.	A play area is facilitated to the west of the development. In addition, there are existing play facilities in existing parks nearby.
There is a clear definition between public, semi-private, and private space.	Private open space is provided for each unit. Communal open spaces is provided through the large communal garden area and roof terraces.
Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	Within this unique scheme the private car is almost entirely restricted to the northern portion of the site allowing a car free open space realm elsewhere in the scheme.

9. Adaptability - How will the buildings cope with change?	
	EVALUATION OF CONSISTENCY
Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.	Yes, the proposed housing units can be adapted as per the needs of the future residents.
The homes are energy-efficient and equipped for challenges anticipates from a changing climate.	Yes, design practices and proposed materials will militate against the effects of climate change.
Homes can be extended without ruining the character of the types, layout and outdoor space.	This can be achieved in the proposed housing units.
The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.	This can be achieved in the proposed housing units.
Space in the roof or garage can be easily converted into living accommodation.	This can be achieved in the proposed housing units.

10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?	
	EVALUATION OF CONSISTENCY
Each home has access to an area of useable private outdoor space.	Yes, each unit has its own private open space in accordance with the minimum residential standards asper the national apartment guidelines.
The design maximises the number of homes enjoying dual aspect.	The majority have dual aspect which accords with national policy.
Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.	All units will be designed to prevent sound transmission in accordance with building regulations.
Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.	Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue of the development particularly in relation to adjoining existing buildings.
The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.	All apartments and houses are designed in accordance with national design standards on storage areas.

11. Parking – How will the parking be secure and attractive?	
	EVALUATION OF CONSISTENCY
Appropriate car parking is on-street or within easy reach of the home's front door.	Only a small portion of the car parking is provided at surface level with the remainder at basement. The parking is secure and readily accessible for all residents who choose to use this facility. This is in line with current NPF policy. Please see the Traffic and Transport Assessment for further details.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.	All of the parking is either visible from the apartments or is within a secure underground car park.
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	The majority of the car parking is in a communal underground car park.
Materials used for parking areas are of similar quality to the rest of the development.	Yes, the highest quality materials will be used throughout the scheme.

Adequate secure facilities are provided for bicycle storage.	Dedicated bicycle parking is provided throughout the scheme in line with the Apartment Guidelines and cycle standards.

12. Detailed Design – How well thought through is the building and landscape design?	
	EVALUATION OF CONSISTENCY
The materials and external design make a positive contribution to the locality.	The proposed development uses a controlled palette of materials please see the architect's drawings.
The landscape design facilitates the use of the public spaces from the outset.	The open spaces will be provided once all the apartments' blocks are completed.
Design of the buildings and public space will facilitate easy and regular maintenance.	This can be achieved and will be provided by the estate management company.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	Parking is predominantly at basement and is limited in favour of providing high quality landscaped open space.
Care has been taken over the siting of flues, vents and bin stores.	Bin stores are located discretely around the site. No other flues or vents are proposed.

Quality Housing For Sustainable Communities: Best Practice Guidelines For Sustainable Communities, 2007

The Department's policy statement DHSC 2007 provides 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 policy statement is accompanied by QHSC 2007 that promotes 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.*

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

	EVALUATION OF CONSISTENCY
Socially & Environmentally Appropriate *"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."*	The scheme will provide an appropriate mix of studio, 1 2,3 bedroom apartments and 4 bedroom houses. The proposal seeks to integrate usable open spaces distributed throughout a number of character areas and all interconnected. All open spaces will be overlooked by adjoining residential blocks.
Architecturally Appropriate *"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."*	The design and layout of the scheme creates a liveable and visually pleasing residential environment. The design is appropriate and mindful of the urban edge context, the site constraints, and architectural character of the adjoining residential areas.
Accessible & Adaptable *"There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime."*	The dwellings in this scheme are highly accessible to all due to the provision 19 no. ground floor own door units and by the provision of lifts within the scheme. The landscaping is clearly laid out and level ensuring people can navigate the area easily. A single vehicular access will be provided, and the majority of car parking is located at basement level. The scheme limits the access of vehicles in the development creating a safe, pedestrian dominated development. Pedestrian and cyclist connections are provided and there will be c.611 no. bicycle parking spaces within the development in total.
Safe, Secure & Healthy *"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."*	The scheme provides excellent segregation of vehicle and pedestrian/ cyclists with the majority of the site free of cars. A very safe walking and cycling environment is provided as a result. Public open spaces are all overlooked by apartments to ensure maximum surveillance.
Affordable	The mix of unit types and sizes will increase the variety of housing stock available in the area making the

"The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development."	scheme affordable to future homeowners and to the developer. A management company will be established to maintain and manage the areas of communal open space, parking and bin storage associated with the apartments.
Durable *"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.*	The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.
Resource Efficient "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."	The subject site is located in close proximity to public transport, education facilities, sports facilities, and retail services. The scheme will be located within 15 mins walk of local services located in Templeogue, Terenure and Rathfarnham Shopping Centre. The apartment blocks are oriented in such a way, so that they have maximum solar gain. This ensures that the units and their associated private open space benefit from sunlight throughout the day. Solar panels/photovoltaic panels will be fitted to roofs to enable solar gain.

Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities, 2024

The Compact Settlement Guidelines 2024 set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Compact Settlement Guidelines 2024 will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this Planning Application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Section 1.3.2 of the Guidelines relating to Compact Growth state that *"priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens".*

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Urban Neighbourhood given the sites location 0.5km from Bus Stop 1159 on Templeogue Road and the associated availability of high frequency bus routes, including the increased service capacity associated with the proposed Core Bus Corridor routes F1 along Fortfield Road, and A1 and A3 along Templelogue Road.

The 'City – Urban Neighbourhoods' category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that ***residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.***

Section 3.4 provides further advice on *Refining Density* and includes a two-step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies 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. Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3.*

Table 3.8 (below) sets out definitions for terms used in the Guidelines to define accessibility, to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

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

Intermediate Location

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

Peripheral

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

Policy and Objective	Response
3.1 and Table 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.	This site is within 500m of excellent existing bus services with further improvements to be delivered in the area via BusConnects (c. 498m from the pedestrian entrance) and therefore is considered to be a High Capacity Public Transport Node or Interchange within a City – Urban Neighbourhood. The density appropriate to this site is identified as being in the range of 50uph to 250uph. Therefore, the proposed density of 107 uph net is considered appropriate to this accessible, urban location.
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.	PUNCH have confirmed that the proposed development is in accordance with DMURS.

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.	Please see the assessment in the table directly below this which confirms the development is in accordance with Section 4.4
5.1 It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations. In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas. In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the	The Development Plan requires that Z15 zoned lands provide 25% of the lands to be allocated to public open space. In this regard, 6,600sqm would be required as a minimum on the net site area to accord with the Development Plan (please refer to OS Map prepared by Urban Agency which defines the development area). The proposal includes c.6989.35sqm of public open space on the net site area (2.64ha) which equates to 26.5% of net site. This figure does not include the lake (Z11) or the existing wooded area surrounding the lake which will also provide recreational and amenity and will form part of the overall Public Open Space provision proposed. Full details of the site's public open space and amenity strategies are detailed in the enclosed Landscape Masterplan and Design Report prepared by NMP.

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	

Section 4.4 Key Indicators of Quality Design and Placemaking Assessment

Key Indicators	Evaluation of consistency
Sustainable and Efficient Movement In order to meet the targets, set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport. Local authorities should plan for the development of well-connected neighbourhoods and a distribution of activities to ensure that day-to-day services and amenities are accessible within walking distance of homes and workplaces. In addition to sustainable travel objectives, this will ensure that settlements are vibrant, and when applied alongside the principles of Universal Design, will allow vulnerable users to move about and access services with ease. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.2 also refers): (a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate. (b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible. (c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists.	This proposed development provides new cycle and pedestrian routes within the development. The local region has many cycle lanes and designated paths for the use of cyclists along with the proposed developments plans to provide additional cycle infrastructure. The National Transport Authority in conjunction with DCC has proposals to upgrade the cycle network. Please refer to the Residential Travel Plan prepared by PUNCH for further information regarding existing and proposed cyclist infrastructure. It is a site that is well located close to existing public transport and facilities both within Terenure and Templeogue. This proposed development creates an attractive, highly permeable urban environment which provides new links through the development connecting to existing gateways.

(d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments. The Design Manual for Urban Roads and Streets (DMURS) sets out statutory guidance and standards in relation to the design of individual streets and the use of traffic management and placemaking measures to manage traffic and promote safer and more vibrant streets (Section 2.3 refers). The application of DMURS in all new developments will be key to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements. Local Authorities should also consider preparing active travel plans or sustainable mobility plans that focus on improving ease of movement in established areas to important destinations such as schools, parks, shops and public transport. This can be of particular benefit where a new transport service or new destination such as a school is proposed	The proposed development will enable people to travel through the site to the rugby club and school via existing gates. The proposal also has ease of access to existing local services. The provision of a high ratio of cycle parking and a lower ratio of car parking will encourage a modal shift to active travel. Use of Cars is minimised within the development in line with this policy. They are restricted to the access road only and do not have access to the south, east or west of the apartment blocks creating a largely car free development. The proposal has been designed in accordance with DMURS.
Mix and Distribution of Uses These 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. Ensuring that there is a good mix and distribution of activities around a hierarchy of centres has many benefits in terms of reducing the need to travel and creating active and vibrant places. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.3 also refers): (a) 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	The proposed development provides a mix of uses and is also in proximity to a range of land uses, reducing the need to travel and creating a sustainable neighbourhood.

(residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development.	This site will provide a very large new public park within the development, to the south of the apartments and around the lake. It will also establish a new use type on this educational site.
(b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved though the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres.	Finally, it will also provide cultural and arts space within the site. Noted. This development is not in a city centre location however, it will deliver a new public open space along with a new community, culture and arts space.
(c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout.	Noted. As state above this proposed development will provide a new community facilities within the development.
(d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access).	Noted. This proposal, for the re-use of underused former educational land for residential is wholly compliant with this policy.
(e) 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.	
(f) 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. Development plans may specify a mix for	This site is ideally located next to multiple bus routes. This is facilitated through the provision of residential amenity facilities such as the communal space, public open space, the lake amenity space and internal amenity spaces for the future occupants of the development. In addition to this the unit mix will provide a new smaller type of housing in an area which is

apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	predominately larger two storey, low density family homes.
Green and Blue Infrastructure Green and Blue Infrastructure (GBI) is a strategically planned network of natural and seminatural areas designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity. Ecosystem services include water purification, enhancing air quality, space for recreation and climate mitigation and adaption. In settlements, GBI includes features such as rivers and canals, coastline and coastal habitats, green spaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans. Development plans should include (or be informed by) a Green and Blue Infrastructure Strategy and include objectives for the conservation, restoration and enhancement of natural assets and GBI networks. These objectives can be refined further in local statutory plans and guidance documents in response to local circumstances. The following key principles should be applied in the preparation of local plans and in the preparation and consideration of individual planning applications, (Figure 4.4 also refers): (a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts. (b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below.	Noted. This proposal will enhance the area around the existing lake by providing additional planting enhancing the existing area, restoring and improving the ecology and biodiversity of this area through the provision of native planting Please refer to the Landscaping Design Report prepared by NMP and the EcIA for further information on how the proposal will enhance the ecology and biodiversity of the area. The proposed new public park also links into the existing open spaces, public and local amenities/ sports clubs surrounding the site by connecting to existing footpaths and creating new routes within the development. SuDS measures are included throughout the development as set out in the PUNCH Consulting Engineers documents as well as within NMP Landscape Rationale.

(c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. (d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.	
Public Open Space All statutory development plans should include a strategy for the provision of an integrated hierarchy of public open spaces and corridors across the plan area to meet the needs of the planned population. The availability of accessible and high quality public open spaces within all settlements that are part of a wider GBI network will be important in creating sustainable settlements. This should include a hierarchy of multifunctional public open spaces and corridors that are accessible and provide for the recreational needs of the planned population, while also creating space for nature and ecosystem services. The public open space strategy in the development plan should include objectives relating to the provision of: (a) Regional, district and local level public parks and greenways. These are generally publicly owned and managed parks e.g. by a local authority or public body such as the OPW or Waterways Ireland. (b) Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development. The objectives of the development plan public open space strategy should be informed by the	Please see the report by NMP Landscape Architects. This clearly demonstrates the integration of the proposed landscape with the existing area. It enhances the existing features on the site, while providing additional planting to create more attractive and diverse area to promote the biodiversity of the area. The proposal will result in the delivery of a new public park within this area. The proposed public open space is in full compliance with the requirements of the DP.

objectives of the RSESs and any regional GBI strategy. The form, size and distribution of new public open spaces should be plan led and take account of open space provision within the area and broader nature conservation and environmental considerations. While there is no set standard of open space provision per settlement in Ireland, it is recommended that opportunities to enhance the overall quantum of public open space and to restore and enhance nature and biodiversity within settlements is harnessed where opportunities arise, for example, through regeneration or urban enhancement projects and in new development areas. The level of provision should take account of the needs of the planned population, protected zones, landscape character and statutory obligations to protect certain habitats and biodiversity. Ideally, all residents within a settlement will have access to a multi-functional public open space within walking distance of their home. Public open spaces should be designed to cater for a range of active and passive recreational needs (including play, physical activity, active travel, cultural uses and community gardens and allotments, as appropriate to the context) and to conserve and restore nature and biodiversity. It will be necessary to balance improved access to natural assets with the need to protect the environment as increased levels of tourism, sports and leisure can impact negatively on nature and biodiversity. In addition, the provision of public open spaces should not result in any direct or indirect adverse effects on the integrity of European Sites. Chapter 5 includes minimum requirements for the provision of open space in new residential developments, based on the net site area	
Responsive Built Form 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 following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.5 also refers): (a) New development should support the formation of a legible and coherent urban	Noted. The proposed development, through the use of varied building heights and forms provides clear legibility to the development. It also reflects the established pattern of development and provides a transition from the existing lower density two storey housing, via the proposed 3 storey houses and stepping up to the apartments, reflecting the existing larger buildings to the south.

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	The proposed development will open up the site, replacing an existing blank wall with a new attractive urban apartment block. This will create a new, attractive urban feature along Fortfield Road. The buildings due to their design not only provide a well-defined edge to the new spaces, but also ensure that all open spaces are overlooked. This is considered to be an exemplar development showcasing contemporary architecture. A varied, high quality palette is proposed for the development which creates a distinctive attractive development within the area.

The Compact Settlement Guidelines 2024 outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing:

SPPR 1 – Separation Distances	**EVALUATION OF CONSISTENCY**
When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces. 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	The proposed development complies with this policy. The proposed blocks and housing units have separation distances greater than 16 metres between opposing windows. Please refer to the Site Layout Plan prepared by Urban Agency for further details.

planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.	
SPPR 2 – Private Open Spaces for Houses	**EVALUATION OF CONSISTENCY**
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.	The proposed houses all comply with the minimum private open space standards as set out in the HQA. Please refer to the Housing Quality Assessment prepared by Urban Agency for further details.
SPPR 3 – Car Parking	**EVALUATION OF CONSISTENCY**
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.	In line with this policy of no more than one space per dwelling , the proposed 19 no. houses have been provided with 1 space each and 138 no. Spaces are provided for the 284 no apartments,. As set out in the PUNCH engineering reports, this is considered acceptable due to the site's proximity to a high quality public transport corridor.

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.	
SPPR 4 – Cycle Parking and Storage	**EVALUATION OF CONSISTENCY**
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	The proposal provides 611 no. bike parking spaces comprising of 465 no. long term spaces and 146 no. short term spaces. The storage areas are safe, secure and overlooked. This is fully compliant with the policy.

cage/compound or preferably locker facilities are provided.	

Evaluation of Consistency
The proposed development is considered an Accessible Location as outlined in the table above, due to the site's proximity (0.5km) to a high quality public transport corridor along Templeogue Road and is considered in accordance with the criteria relating to car parking, separation distances, density, private open space and cycle storage for such locations.

Urban Agency Architects have prepared a Housing Quality Assessment which demonstrates how the proposal is in accordance with the space requirements.

Overall, it is considered that the proposed development will provide a high-quality apartment scheme that is in line with the Compact Guidelines.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2023

The Apartment Guidelines 2023 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the NPF and Rebuilding Ireland. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2020.

In relation to appropriate locations for apartment developments and increased density the Guidelines identify 3 urban location types. *"Central and/or Accessible Urban Locations"* are identified as those which can accommodate large scale, and higher density developments and wholly comprise apartments. Such locations are within 15 mins walk of significant employment locations (which include hospitals and third level institutions) and 10 mins walk of Luas, DART and 5 mins walk of high frequency bus services.

The subject site represents an "Central and /or Accessible Urban Location" in this regard due to its proximity to Bus Stop 1159 on Templeogue Road and the associated availability of high frequency bus routes, including the service capacity associated with the proposed 'Tallaght to Terenure' Core Bus Corridor Route.

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to.

SPPR 1	**EVALUATION OF CONSISTENCY**
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	The proposed development provides 265 no. apartments. Of which, 10 (4%) are studios, 117(41%) are 1 beds, 129 (45%) are 2 beds, and 9 are 3 beds. It is therefore compliant with the stated housing mix in the guidelines.

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).	
SPPR 2	**EVALUATION OF CONSISTENCY**
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 residential7 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	N/A. Please see SPPR1 and SPPR 7
SPPR 3	**EVALUATION OF CONSISTENCY**
Minimum apartment floor areas: studio apartments (1 person) 37sqm 1 bedroom apartment (2 persons) 45sqm 2 bedroom apartment (4 persons) 73sqm 3 bedroom apartment (5 persons) 90sqm	The current proposal achieves these standards as set out in the Housing Quality Assessment.
SPPR 4	**EVALUATION OF CONSISTENCY**
In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following apply i) a minimum of 33% of dual aspect units will be required in more	The current proposal proposes 63% dual aspect units which is higher than the minimum 33% required for Central Accessible Locations such as this.

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	
SPPR 5	**EVALUATION OF CONSISTENCY**
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	The proposed building achieves this standard within each block.
SPPR 6	**EVALUATION OF CONSISTENCY**
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.	Each apartment core has 12 or less than 12 apartment per core in accordance with SPPR6.

EVALUATION OF CONSISTENCY with Apartment Guidelines

While it is noted that ABP Inspector identified this site as an intermediate location, it is considered that due to the distance involved to existing bus stops which have a high frequency route, the proposed development is considered a Central and/ or Accessible Urban Location, as outlined in the table above. However, whether it is considered a Central and/ or Accessible Urban or an Intermediate location, the proposal is in accordance with criteria for both respectively relating to car parking, density, units mix, and dual aspect for such locations.

Urban Agency Architects have prepared a Housing Quality Assessment which demonstrates how the proposal is in accordance with the space requirements in Appendix 1.

Overall, it is considered that the proposed development will provide a high-quality apartment scheme that is in line with the Apartment Guidelines.

DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The DMURS was first published in 2013 and has since been updated in May 2019. This document 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.

EVALUATION OF CONSISTENCY

The proposed design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of a low parking and shared car provision actively promotes a modal shift to alternative forms of transport while also creating a high quality public open space in the area. This scheme prioritises pedestrians and cyclists through the development. Vehicles access into the heart of the scheme is limited to emergency, service vehicles and accessible spaces. Permeability for cyclists and pedestrians is therefore prioritised. A DMURS Statement prepared by PUNCH engineers is included with this submission.

GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Guidelines for Apartments*, 2022 states the following:

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

EVALUATION OF CONSISTENCY

A Childcare Assessment Report has been carried out by Turley to determine the existing childcare provision in the study area and to ascertain the need, or likely demand, if any, for a childcare facility to be provided as part of the proposed development.

The report concluded that 11 no. childcare facilities exist within 1km of the site, providing a total of 550 childcare spaces for the study area. The demand for childcare arising from this development has been determined by analysing CSO data and very low, comprising a demand for 3 to 6 no. childcare spaces in accordance with the Childcare Guidelines 2001 and the Apartment Guidelines 2022. Please refer to the Turley Childcare Assessment Report for further information.

As required by the DCDP (2022-2028), childcare facilities within a 1km study area have been reviewed and confirmed by telephone survey at a robust response rate of 82%. This survey confirms that there are 11 no. childcare facilities operating within 1 km of the subject site providing 550 no. childcare spaces and a vacancy rate of 8 no. children.

Notwithstanding this, a creche of c.100.0sqm to accommodate 17 no. children is proposed on the ground floor of Block D with an external play area of c.153sqm. The proposed creche is located to the

north-east corner the of site which is considered to be the most optimal position due to its proximity in relation to the access road and drop off area, and to ensure privacy.

TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035

The NTA Strategy promotes the consolidation of the Metropolitan Dublin area (where the application is located) allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike. This document identifies under its primary policy, in section 2.2 that "*the Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions.* ***This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available."***

EVALUATION OF CONSISTENCY

This proposed development with its reduced car parking ratio and location close to the city centre and several high frequency Dublin Bus routes is in line with the ambitions of this policy. The proposed development, by its promotion of reduced car parking, promotes the use of alternative modes of transport including cycling, walking and public transport.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

EVALUATION OF CONSISTENCY

A Site-Specific Flood Risk Assessment has been carried out by PUNCH Consulting Engineers.
Punch's report concluded that *For the purposes of carrying out this SSFRA a 1D hydraulic model of the adjacent drainage pond was developed and analysed. The results of the hydraulic modelling indicate that flood waters from the 1%AEP and 0.1%AEP events are retained within the contoured lands around the pond and do not pose a flood risk to the proposed development. The proposed development site is therefore deemed to be within Fluvial Flood Zone C. A minimum FFL of 48.0mOD is proposed.*

A review of available flood mapping and historic data, coupled with the development of the 1D hydraulic model of the pond, has shown that the development site is located within Flood Zone C for both Fluvial and Coastal Flooding.

To alleviate concerns relating to pluvial flooding at the site, the estimated 1%AEP and 0.1%AEP flood

volumes, within and around the site, were calculated. These volumes were used in the development of pluvial flood alleviation measures which are discussed more fully in the Engineering Planning Report (222102-PUNCH-XX-XX-RP-C-0002). These flood alleviation measures will remove pluvial flooding from a section of Fortfield Road for storm events up to and including the 1%AEP event, offering a significant reduction in pluvial flood risk to that area.

Given that the site is located in Flood Zone C, and the development is residential in nature, a Justification Test is not required as part of this SSFRA report. The mitigation measures proposed will ensure that the development is in compliance with the relevant sections of the Dublin City Council Development Plan as outlined in Section 2.2 as well as in full compliance with the Dublin City Council SFRA and The Planning System & Flood Risk Management Guidelines

Local Planning Policy

Dublin City Development Plan 2022-2028

The site is located within the administrative area of Dublin City Council and is therefore subject to the land use policies and objectives of the City Development Plan 2022-2028.

Zoning

The site is zoned Z15 'Community and Social Infrastructure within the DCDP. The objective of zoning Z15 is *"Community and Social Infrastructure".* The existing lake to the southeastern corner of the site is zoned Z11 with the objective to *"To protect and improve canal, coastal and river amenities".* A small portion of the site to the north east of the lake currently as open space is zoned Z1 *"Sustainable Residential Neighbourhoods".*

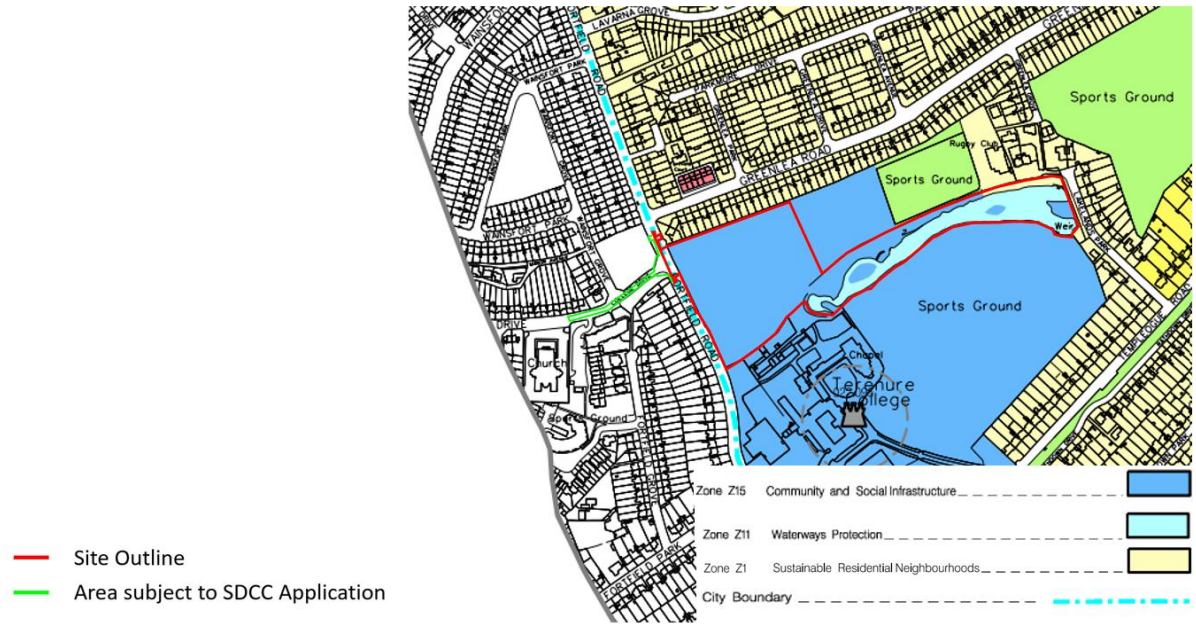

Figure 30 Zoning Map

Z11 Permitted in Principle
Open space, water-based recreational activities.
Z11 Open for Consideration
Café/tearoom, public service installation, restaurant.

Zoning Z11 allows for open space uses to be permitted in principle on this land use zoning. Section 14.7.11 of the DCDP states "*These areas generally include all the waterways and waterbodies in the Dublin City Council area. The purpose of the zoning is to protect the amenity and integrity of these areas, including views and prospects into/out of the areas (see Chapter 9, Section 9.5.2 Urban Watercourses and Water Quality, and also Chapter 10, Section 10.5.5 – Rivers and Canals). The coast, canals, and rivers play a role in contributing to the development of a strategic green and blue network and also provide for critical flood management and climate adaptation infrastructure. The chapters detailing the policies and objectives for landscape, biodiversity, open space/recreation and standards, respectively, should be consulted to inform any proposed development (see Chapters 10 and 15). The uses set out below will be considered on the basis that they would not be detrimental to Z11 zoned lands.*"

Z1 Permitted in Principle
Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, **open space**, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre.
Z1Open for Consideration
Allotments, beauty/ grooming services, bed and breakfast, betting office, Build to Rent residential, café/tearoom, car park, civic and amenity/recycling centre, garden centre/plant nursery, guesthouse, hostel (tourist), hotel, industry (light), laundromat, live/work units, media-associated uses, mobility hub, off-licence, off-licence (part), office, park and ride facility, petrol station, pigeon loft, postal hotel/motel, primary health care centre, public house, residential institution, restaurant, student accommodation, veterinary surgery.

As highlighted above, Zoning Z1 allows for open spaces uses to be permitted in principle on this land use zoning.

Z15 Permitted in Principle
Assisted living/retirement home, buildings for the health, safety and welfare of the public, café/ tearoom (associated with the primary use), cemetery, childcare facility, club house and associated sports facilities, community facility**, cultural/recreational building and uses**, education, medical and related consultants**, open space**, place of public worship, primary health care centre, public service installation, residential institution (and ancillary residential accommodation for staff), sports facility and recreational uses.
Z15 Open for Consideration
Allotments, car park ancillary to main use, civic and amenity/recycling centre, conference centre (associated with the primary use), crematorium, craft centre/ craft shop (associated with the primary use), municipal golf course, **residential (only in accordance with the highly exceptional circumstances set out above)*,** restaurant, shop (local), student accommodation (associated with the primary institutional use), training centre (associated with the primary use), veterinary surgery.
**see assessment against Z15 policy below*

Both open space and the provision of cultural/ recreational buildings/ uses are permitted in principle under this Z15 zoning, and therefore these elements of the proposal are fully compliant with the Development Plan.

Residential uses are 'Open for consideration' in areas zoned 'Z15' subject to being compatible with the overall policies and objectives for the zone. Section 14.7.14 of the Development Plan states that "*Limited residential/commercial development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the landowner/applicant that the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands."* This is discussed in detail below and in the Z15 Compliance Statement by McGill Planning Limited submitted with this application. A synopsis of same is discussed below.

Section 14.7.14 of the Development Plan states that the following criteria must also be adhered to:

Part A 'Development on Z15 Lands'	
Policy	**Evaluation of Consistency**
In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.	Please see the Z15 Statement of Compliance by McGill Planning. This confirms in detail compliance with these criteria. The Carmelite Order have confirmed that they *"are in active dialogue with the Department of Education regarding accommodating their potential future educational requirement in the south Dublin City area within the significant landholding of Terenure College."* Therefore, the land, the subject of this application is not required for current or future educational purposes. Please refer to the letter submitted as part of this application by the Carmelite Order and accompanying letter from the Applicant. In summary the future extension of Terenure College and/or the provision of a new school, to provide for the additional educational needs for the area, in the future can be readily accommodated within the remaining Terenure College lands as has been agreed in principle between the School and the Department.
Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.	The proposed development is to be provided on a net development site area of 2.64 ha and will also provide for over 6622.8sqm of public open space (26.5% of the net site area). The overall institutional lands total over 19.5ha (48 acres). The development site equates to only 13.5% of the overall landholding and is therefore subordinate to the primary education/institutional use.

	Furthermore, as set out in the Z15 compliance statement, the varying building heights ensure that the proposed development is visually subordinate to the existing primary institutional use on the site. This is demonstrated by the verified views submitted with the application.
Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.	Please refer to letter from the Carmelite Order which confirms that they *"are in active dialogue with the Department of Education regarding accommodating their potential future educational requirement in the south Dublin City area within the significant landholding of Terenure College."* Therefore, the land, the subject of this application is not required for educational purposes.
The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.	The development will not compromise the open character of the site itself by providing over 25% of the net site area as open space along with all of the Z11 and Z1 lands retained as Open space. The lake and its surroundings will be retained and enhanced as will much of the mature tree/vegetation and will be made publicly accessible as part of the development.
In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.	Please refer to the Z15 Compliance Statement submitted by McGill Planning Ltd which demonstrates that the lands are no longer required for an educational use. The sale of this land will enable additional funding for Terenure College to enhance the existing facilities on site.
In all cases the applicant shall be the landowner or have a letter of consent from the landowner.	Please refer to the letter of consent submitted by the Carmelite Order.
Part B Development Following Cessation of Z15 Use	
It is the objective of the Council that such lands should be retained for a use in accordance with the zoning objective unless exceptional circumstances prevail. In such circumstances, (i.e. cessation of use on a Z15 site or disposal of all or part of a Z15 site), a variation or material contravention to the development plan will be required to develop such lands for residential/commercial purposes. Any such variation/material contravention would need to be supported by a detailed community and social infrastructure audit which should clearly demonstrate why the land is not viable/ suitable for social and community use (defined as the physical infrastructure necessary for successful communities, i.e. community infrastructure such	Please refer to the Statement of Compliance submitted by McGill Planning Ltd.

as schools, libraries, community centres, cultural spaces, health centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity) in accordance with the zoning objective.	
Masterplan Requirement	
In either scenario A or B, it is a requirement that for sites larger than 1ha that a masterplan is provided. The masterplan must set out the vision for the lands and demonstrate that a minimum of 25% of the overall development site/lands is retained for open space and/or community and social facilities. This requirement need not apply if the footprint of existing buildings to be retained on the site exceeds 50% of the total site area. The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network. Development proposals must incorporate landscape features that contribute to the open character of the lands and ensure that public use, including the provision of sporting and recreational facilities which would be available predominantly for the community, are facilitated. Where there is an existing sports pitch or sports facility on the Z15 lands subject to redevelopment, commensurate sporting/recreational infrastructure will be required to be provided and retained for community use where appropriate as part of any new development	Please refer to the Campus Masterplan by Urban Agency within their Design Statement.

DEVELOPMENT STANDARDS

The following tables review Development Plan policies on urban design, residential, open space and landscaping and physical and social infrastructure as relevant to the proposed development.

Chapter 3: Climate Action

Policy	Evaluation of Consistency
CA3 Climate Resilient Settlement Patterns, Urban Forms and Mobility To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.	The proposed development is contributing towards climate resilient settlement patterns, urban forms and mobility. The subject site is within the well-established urban village of Terenure. The site is currently vacant. The development of this site is in line with climate resilience as it ensures development occurs to a serviced site rather than a greenfield site. Please

	refer to the Climate Action and Energy Statement Report prepared by OCSC. See also response at CA5 below.
CA4 Improving Mobility Links in Existing Areas To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.	The design of the proposed development will provide a new public park with walkways, around the existing lake and woodland park which is currently not open to the public.
CA5 Climate Mitigation and Adaptation in Strategic Growth Areas To ensure that all new development including in Strategic Development and Regeneration Areas integrate appropriate climate mitigation and adaptation measures. See also Section 15.4.3. Sustainability and Climate Action and Section 15.7.3 Climate Action and Energy Statement.	The proposed development incorporates appropriate climate mitigation and adaptation measures. An Energy and Sustainable Report has been prepared by OCSC is submitted with this pre planning meeting request.
CA8 Climate Mitigation Actions in the Built Environment To require low carbon development in the city which will seek to reduce carbon dioxide emissions, and which will meet the highest feasible environmental standards during construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for: a) building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b) sustainable building/services/site design to maximise energy efficiency; c) sensitive energy efficiency improvements to existing buildings; d) energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e) on-site renewable energy infrastructure and renewable energy; f) minimising the generation of site and construction waste and maximising reuse or recycling; g) the use of construction materials that have low to zero embodied energy and CO2 emissions; and h) connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.	The proposed layout will ensure that the proposed units and open spaces will all achieve good levels of daylight and sunlight. The proposed layout has been assessed by OCSC in their Daylight Sunlight & Overshadowing Assessment which confirms that the entire development achieves excellent levels of internal daylight. The results show a 98.7% compliance rate has been achieved when compared against Criterion I of the BRE Guide 3rd Edition standard for daylight. Against Criterion II, a 98.3% compliance rate has been achieved. A secondary daylight analysis was completed using the targets set out in Appendix 16 of the Dublin City Council (DCC) Development Plan, and a 99.7% compliance rate was achieved against this standard. The proposal includes reduced car parking predominantly at basement level and a high provision of cycle parking which will encourage a modal shift away from car dependency. The layout will also provide pedestrian permeability throughout. The building will be built to a high quality, ensuring maximum energy efficiency. Please see the Building Life Cycle Report prepared by GAA and the Energy and Sustainability Report prepared by OCSC for further detail. Standard construction waste practices will be used to minimise the waste generated during the construction phase.

CA9 Climate Adaptation Actions in the Built Environment Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The council will promote and support development which is resilient to climate change. This would include: a) measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; b) ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings; c) minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); d) reducing flood risk, damage to property from extreme events– residential, public and commercial; e) reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; f) promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure	The proposal includes SuDs components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving. In terms of flood risk, the Flood Risk Assessment prepared by PUNCH concludes that the proposed development is located within Flood Zone C and is not at risk of flooding nor will it result in increased risk to the existing neighbours. A Landscape plan is also submitted with this application in the interest of protecting and promoting biodiversity on this site.
CA10 Climate Action Energy Statements All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	An Energy and Sustainability Report prepared by OCSC has been submitted with this application. This report outlines how the proposed development will use low carbon energy and heating solutions.
CA15 Waste Heat, District Heating and Decentralised Energy To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.	OCSC's Energy and Sustainability Report provides further details on low carbon and highly efficient district heating and decentralised energy systems. The following solutions are envisaged for the proposed development: • High performance U-Values. In order to limit heat loss through the façade, the energy report sets out targeted medium average elemental U-Values for both the residential

	and non-residential aspects of the development. • Air tightness. It is intended that the residential and non-residential aspects of the development will both target an air permeability rate of ≤ 3 m³/hr/m² @50 Pa. • Thermal Transmittance. The energy statement sets out how the proposal will be designed to achieve low thermal bridging values throughout.
CA17 Supporting the Potential of District Heating in Dublin City To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition: • Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. • Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to the Dublin District Heating System.	Please refer to the Energy and Sustainability Report prepared by OCSC.
CA29 Climate Action and Green Infrastructure To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides.	The proposed development provides for a new public open space and also forms a new connection with the existing lake and woodland area. This area has been land locked up until now and will form part of the wider green infrastructure network.

Chapter 4: Shape and Structure of the City

Policy	Evaluation of Consistency
SC9 Key Urban Villages, Urban Villages and Neighbourhood Centres To develop and support the hierarchy of the suburban centres, including Key Urban Villages,	The proposed development is located within the established residential area of Terenure. The development of this vacant site through the provision of appropriately high density housing

Urban Villages and Neighbourhood Centres, in order to: • support the sustainable consolidation of the city and align with the principles of the 15 minute city; • provide for the essential economic and community support for local neighbourhoods; and • promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services.	is in line with the principles of the 15 minute city and the compact city. The site is close to an array of amenities and services such as employment, retail, medical, educational and recreation. As demonstrated by the Architects Design Statement it will improve the character of the area, particularly along Fortfield Road by removing a 1.8m high concrete wall which only provides dead frontage and replacing it with a high-quality residential building, improving the sense of place.
SC10 Urban Density To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.	As set out above the proposal and its density is considered appropriate for this site and in accordance with the principles set out in the Sustainable Residential Developments in Urban Areas - Guidelines for Planning Authorities and the Urban Design Manual and the updated Sustainable Residential and Compact Settlement Guidelines 2024.
SC11 Compact Growth In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will: • enhance the urban form and spatial structure of the city; • be appropriate to their context and respect the established character of the area; • include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; • be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; • and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.	The proposed development will provide a high-quality residential development on this site within the existing suburban environment. It is appropriate to the context and has been carefully designed to minimise any impact on the surrounding residential properties. There are a wide range of community facilities within a short distance of the subject site. The proposal has been designed in accordance with all relevant standards and guidance
SC12 Housing Mix To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix,	The scheme provides for a variety of housing and apartment sizes and types.

<table>
<tr>
<td>which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.</td>
<td>The unit mix breakdown of the scheme is as follows:
<table>
<tr><th>Unit Type</th><th>Number</th><th>Percentage</th></tr>
<tr><td>Studio</td><td>10</td><td>4%</td></tr>
<tr><td>1 bed</td><td>117</td><td>41%</td></tr>
<tr><td>2 bed</td><td>129</td><td>45%</td></tr>
<tr><td>3 bed</td><td>9</td><td>3%</td></tr>
<tr><td>4 bed</td><td>19</td><td>7%</td></tr>
</table>
</td>
</tr>
<tr>
<td>SC13 Green Infrastructure
To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.</td>
<td>The proposal includes green spaces which provide communal and public open spaces to serve the development and the wider area. These green spaces will contribute to mitigating and adapting to climate change by providing a cooling effect for the urban environment, a habitat for flora and fauna, and drainage for surface water.</td>
</tr>
<tr>
<td>4.5.4 Increased Height as Part of the Urban Form and Spatial Structure of Dublin
Appropriate heights should be based on an evaluation of the sites attributes and its function, its surrounding context and capacity for growth and the most appropriate development form. It is a requirement that a masterplan will be prepared for any site greater than 0.5ha to allow for the early testing of appropriate open space, sunlight, daylight, visual impacts wind effect etc. and that this is used to inform design development.

Proposals seeking to optimise height in achieving higher densities must demonstrate how they will assist in delivering vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced and that respond positively to the existing or emerging context. Appendix 3 also sets out a detailed set of performance based criteria for the assessment of proposals of enhanced scale and height so as to ensure the protection of the natural and heritage assets of the city.</td>
<td>As demonstrated by the Architects Design Statement, careful consideration has been given to the prevailing contexts of the site, including the existing residential areas surrounding the site, Terenure College, the existing lake, the play pitches of the Terenure Rugby Club, and what the impact of increased height on this site has for the surrounding area. The proposed height of 2 to 3 storey houses and 3-6 storeys for the apartment blocks is therefore considered suitable at this location.</td>
</tr>
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<td>SC14 Building Height Strategy
To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.</td>
<td rowspan="2">The proposed development includes heights up to 6 storeys. This height can be readily absorbed at this location without due impact on the character of the area or neighbouring properties.

The proposed development provides open spaces, landscaping and additional facilities in the form of community, culture and arts space.

As set out above under the National Policy section, the development is in line with guidelines SPPR 1-4.</td>
</tr>
<tr>
<td>SC15 Building Height Uses
To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.</td>
</tr>
</table>

SC16 Building Height Locations To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.	The proposed height of 3-6 storeys for the apartment blocks is considered suitable at this location. Situating the lowest typologies with a sufficient setback next to the existing row of two storey housing on Greenlea Road, the scheme sensitively increases in height as it moves to the south-east end of the site. This blends the development into the context while incorporating a high density of units. It will also provide new accessibility to the lake and surrounding areas, opening up this site and creating an attractive active location.
SC17 Building Height To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height: • follow a design led approach; • include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3); • make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context; • deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including cranage); and • have regard to the performance-based criteria set out in Appendix 3. All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.	
SC19 High Quality Architecture To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods	The proposed development will make a positive contribution to the built environment. It will provide a new public open space in the southern corner of the site and will provide strong frontages to the open spaces and public realm. It is considered to be a high-quality exemplar design that will improve the character and appearance of this key site along Fortfield Road.
SC20 Urban Design Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and	The proposal is in accordance with the Urban Design Manual and the DMURS. Please see the report submitted by PUNCH.

in the Design Manual for Urban Roads and Streets (2019).	
SC21 Architectural Design To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.	The proposal will provide a contemporary building on this vacant site which will make a positive contribution to the character of the area while also being resilient to climate change.
SC22 Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.	The subject site is not located within an Architectural Conservation Area or located close to any protected structures. The proposed development has been designed sensitively to respond to the existing character of the area and in particular to Terenure College, which has been demonstrated in the photomontages submitted as part of this assessment. Please also refer to the Historic Landscape Assessment Report prepared by John Olley.
SC23 Design Statements That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.	Urban Agency Architects have prepared a Design Statement which is submitted with this application. This statement is in accordance with the principles set out in Chapter 15.

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Policy	Evaluation of Consistency
QHSN1 National and Regional Policy To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.	The proposed development will provide additional housing on this site within the existing built-up area of Terenure in Dublin City. This is in line with all regional and national policies.
QHSN2 National Guidelines To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2022), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our	Compliance with QHSC 2007 is demonstrated under the heading National and Regional policy section. We refer to the Development Summary and Schedule prepared by Urban Agency Architects for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.

Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019), the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.	
QHSN5 Community Led Regeneration To ensure that regeneration of estates and communities will be planned with the needs of existing and future residents at the core.	The proposed development will provide new apartments and houses at this suburban vacant site in the established area of Terenure, in close proximity to existing services and public transport options. The site is considered surplus to the requirements of the Department of Education and therefore considered appropriate for development to help with the consolidation of the urban area and active land management policies.
QHSN6 Urban Consolidation To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.	
QHSN9 Active Land Management To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.	
QHSN10 Urban Density To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.	The proposed development will provide a high-density development which is cognisant of the character of the surrounding area.
QHSN11 15-Minute City To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.	There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools. The location of the site contributes to the accessibility of surrounding facilities for the daily needs of the residential development
QHSN12 Neighbourhood Development To encourage neighbourhood development which protects and enhances the quality of our built	The proposed development will have a positive impact on the existing suburban area of

environment and supports public health and community wellbeing. Promote developments which: • build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; • integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; • encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model. • promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance; • promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; • cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; • provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; • have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'; • are designed to promote safety and security and avoid anti-social behaviour	Terenure, it is in proximity to existing services and public transport options. The architectural design has taken the character of the surrounding area into consideration throughout its design. Green spaces which provide communal and public open spaces incorporated into the layout of the development to serve both the proposed development and the wider area.
QHSN13 Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long-term vision of improving the	The proposed development includes a range of facilities which will not only benefit the future residents of the development but also the wider community. These include a new area of public open space adjacent to the lake lands, providing access to this attractive feature Terenure.

physical and mental health and well-being of the population at all stages of life.	It is also proposed to include community and cultural facilities for the benefit of the wider community.
QHSN14 High Quality Living Environment To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.	The proposed development supports the provision of high-quality living environment to both its residents and for the wider area by providing accessible public open space and close to existing local facilities.
QHSN16 Accessible Built Environment To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.	The proposed development has been carefully designed to respond to the existing built-up area surrounding the site. The proposal includes both communal and public open spaces that are accessible and offer high quality amenity space. The space is designed to have appropriate level access, gentle gradients and lifts where appropriate. Some of the apartment are also designed to UD standards.
QHSN17 Sustainable Neighbourhoods To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.	This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.
QHSN18 Needs of an Ageing Population To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2019.	The units of proposed development are designed to be suitable for older people/mobility impaired people and people with disabilities.
QHSN19 Youth Friendly City To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC	The proposed development includes a public open space and is located in close proximity to numerous existing open spaces and sports facilities. These are outlined in detail in the Community and Social Infrastructure Audit.

Youth Friendly City Strategy including any future youth homeless strategy.	
QHSN21 Gated Residential Development It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.	The proposed development will not be a gated residential development and will include accessible and permeable open spaces.
QHSN22 Adaptable and Flexible Housing To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015	All units are sized to allow some minor internal reconfiguration and adaptation.
QHSN25 Housing for People with Disabilities To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/supported living units, lifetime housing, and adaptation of existing properties.	The units of proposed development are designed to be suitable for older people/mobility impaired people and people with disabilities. Please see the Universal Design Report by Urban Agency.
QHSNO11 Universal Design To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.	All of the apartments meet or exceed the minimum standards. The units are designed to be suitable for older people/mobility impaired people and people with disabilities. Please see the Universal Design Report by Urban Agency.
QHSN34 Social, Affordable Purchase and Cost Rental Housing To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH	Please see the Part V pack submitted with this application. This is in accordance with this policy.

'Social Housing Strategy 2020' and support the realisation of public housing.	
QHSN36 High Quality Apartment Development To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.	The proposed development will provide a high quality apartment development that includes quality private, communal and public amenity space and is located in close proximity to local facilities.
QHSN37 Houses and Apartments To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.	The proposed development will provide Part V social housing suitable serving family, individuals, couples and empty nesters.
QHSN38 Housing and Apartment Mix To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.	This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.
QHSN39 Management To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.	All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up keep. Please refer to the GAA operational management plan for further information on the management of the property.
QHSN47 High Quality Neighbourhood and Community Facilities To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.	A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site within the vicinity. The provision of additional population will support the vitality and vibrancy of these businesses. The proposed development will also provide additional facilities in the form of community, culture and arts space. Please see the Community Culture and Arts Assessment submitted with this application for further detail. It will also provide for a new attractive public realm and high quality communal and public amenity space.

QHSN48 Community and Social Audit To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.	A Community and Social Infrastructure Audit by Turley Associates has been completed and is submitted as part of this application.
QHSN49 Phasing To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	The Outline Construction, Demolition and Environmental Wate Management Plan prepared by PUNCH Consulting Engineers states that *"it is intended that the development will be constructed in a single phase."*
QHSN50 Inclusive Social and Community Infrastructure To support the development of social and community infrastructure that is inclusive and accessible in its design and provides for needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse.	The proposed development provides for a housing and apartment development along with a new public open space and cultural space. It is within 1km of a wide range of commercial, retail and education facilities. These facilities have been designed to be accessible for all.
QHSN51 Amenities and Retail To ensure all areas of the city, including those that have Local Area Plans, deliver social infrastructure, sports and recreational facilities, retail outlets, schools and infrastructure in accordance to an agreed phasing programme to ensure large neighbourhoods are not left isolated without essential services.	A Social & Community Infrastructure Audit is submitted as part of this planning application. This audit highlights existing social and community infrastructure provision in the area. The audit also determines if education and childcare facilities specifically have capacity to support the future population of the proposed development. Please refer to this audit for further information.
QHSNO15 Community Safety Strategy That all housing developments over 100 units shall include a community safety strategy for implementation	A Community Safety Strategy has been submitted as part of this application and demonstrates that the proposed development is in line with the key principles outlined in Section 15.4.5 of the DCDP. The proposed development: - provides passive surveillance of streets, open spaces and parking - avoids blank facades, dark or secluded areas - provides adequate lighting. Detail of this is also shown in the lighting plan submitted. - provides a distinction between public, communal, and private open space. This is also demonstrated in the landscape pack.

	- Provides clear routes for pedestrians and cyclists - Ensures vehicles entering the site maintain a suitably low speed. Further detail is also provided in the engineering reports.
QHSNO16 Culture Near You Tool To utilise the potential of the Council's Culture Near You tool over the lifetime of the Plan in the preparation of social and community audits	Turley Property Consultants consulted this tool when preparing the Social and Community Infrastructure Audit submitted with this application.
QHSN55 Childcare Facilities To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision and location is in keeping with areas of population and employment growth.	Turley Property Consultants consulted with Dublin City Childcare Committee to obtain raw data on childcare vacancies within the Terenure area. Results of this survey can be viewed within the Social and Community Infrastructure Audit. It is envisaged that the proposed development will not create an unprecedented demand for childcare services as a result of the unit mix provision. A Childcare Assessment Report has been carried out by Turley to determine the existing childcare provision in the study area and to ascertain the need, or likely demand, if any, for a childcare facility to be provided as part of the proposed development. The report concluded that the demand for childcare arising from this development is considered to be very low, comprising a demand for 3 to 6 no. childcare spaces in accordance with the Childcare Guidelines 2001 and the Apartment Guidelines 2022. As required by the DCDP (2022-2028), childcare facilities within a 1km study area have been reviewed and confirmed by telephone survey at a robust response rate of 82%. This survey confirms that there are 11 no. childcare facilities operating within 1 km of the subject site providing 550 no. childcare spaces and a vacancy rate of 8 no. children. Notwithstanding this, a creche of c.100.0sqm to accommodate 17 no. children is proposed on the ground floor of Block D with an external play area of c.153sqm. The proposed creche is located to the north-east corner the of site which is considered to be the most optimal position due to its proximity in relation to the access road and drop off area, and to ensure privacy.

Chapter 7: The City Centre Urban Villages and Retail

Policy	Evaluation of Consistency
CCUV20 Mixed Use Key Urban Villages/Urban Villages To support the development, regeneration and or consolidation of Key Urban Villages/urban villages as appropriate, to ensure these centres continue to develop their mixed used role and function adding vitality to these centres including through the provision of residential development.	The site is located within the Urban Village of Terenure, as defined by Figure 7-1 of Chapter 7 of the DCDP. The proposed development provides 284 residential units. These units will support the vitality and viability Terenure through increased population. The social and community infrastructure report provides details on the existing services and amenities throughout the Terenure area.
CCUV23 Active Uses To promote active uses at street level in Key Urban Villages and urban villages and neighbourhood centres.	The proposed residential scheme will provide for active street frontages along the public open space. The removal of the concrete wall and incorporation of houses / apartments will create active frontage along Fortfield Road.
CCUV37 Plan Active and Healthy Streets To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.	The scheme will provide accessible, permeable open space that will promote a safe walking, cycling environment and recreational space.
CCUV38 High Quality Streets and Spaces To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.	The proposed development has been designed to a high quality. The proposed blocks and houses will provide a strong frontage to the internal streets and open spaces while also respecting the existing developments adjacent to the site. The proposed public realm and open spaces will also be of high quality.
CCUV39 Permeable, Legible and Connected Public Realm To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.	The proposed layout and design ensure a permeable and legible development for all users. There are pedestrian pathways through the public realm which provide clear, accessible routes through the site. The layout and design of the scheme will provide a high-quality living environment where safety and convenience are of the utmost importance. Public open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.
CCUV40 Public Safety To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.	
CCUV44 New Development	The proposed development is accessible to all.

That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility.	The scheme creates linkages to the existing lake area and woodland which have been landlocked until now.

Chapter 8: Sustainable Movement and Transport

Policy	Evaluation of Consistency
SMT1 Modal Shift and Compact Growth To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.	165 no. car parking spaces are proposed to be provided, of which 138 are designated for the apartments equating to a ratio of 0.52 cars per unit. This is appropriate given its central and accessible location and the aim to create a modal shift to more sustainable modes of transport. Walking and cycling are prioritised throughout the scheme. The site's proximity to high quality public transport and the provision of bicycle spaces to ensure a modal shift to a more sustainable mode of transport is encouraged on this infill site. The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk from the site.
SMT2 Decarbonising Transport To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.	EV charging facilities are provided for within the scheme. EV charging infrastructure will be provided for 100% of parking spaces allocated to dwellings (19 no. EV spaces) and car share (10 no. EV spaces) and for 50% of all spaces serving apartment units (69 no. EV spaces). 100% of spaces proposed will be future proofed for electrical charging.
SMT4 Integration of Public Transport Services and Development To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places	The site is very well serviced in terms of public transport. There are numerous bus routes which serve the site including the 54a which serves along Fortfield Road, and routes 15, 49, 65 and 65B are a 10 minute walk from the subject site.
SMT5 Mobility Hubs To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.	This proposal includes Car sharing facilities as is demonstrated by the Letter of Intent from Go Car. In addition to this there are significant quantum of bike storage facilities across the site. These facilities can also store micro mobility forms of transport. It is given the sites location

	this is an ideal site to be car free and use alternative modes of transport.
SMT6 Mobility Management and Travel Planning To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.	The proposed development encourages a modal shift to sustainable transport methods. The scheme incorporates a reduced car parking provision. Please see the Traffic and Transportation & Residential Travel Plan prepared by PUNCH submitted as part of this application.
SMT7 Travel Plans for New and Existing Developments To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.	
SMT9 Public Realm in New Developments To encourage and facilitate the co-ordinated delivery of high-quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.	Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high-quality public realm. The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing developments adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company.
SMT12 Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.	The proposed development will result in a new public open space adjacent to the lake on site. It will enable the reallocation of private space to a public realm use while improving the safety of the lands. Within the development a new pedestrian route is provided along the southern eastern boundary connecting the blocks in an attractive, car free manner. Vehicles are directed to basement parking upon entering the proposed development.
SMT13 Urban Villages and the 15-Minute City To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.	There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools. As walking and cycling are prioritised throughout the scheme, the location of the site contributes to the aim of 15-minute city that encourages ease of accessibility to surrounding facilities for people of all ages and abilities by walking, cycling and public transport.
SMT16 Walking, Cycling and Active Travel To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all	

ages and abilities, in line with the city's mode share targets.	
SMT18 The Pedestrian Environment To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.	The proposed development will provide new access to the lake and woodland space. This will also be overlooked by the apartments making public open space a safe and attractive place to be.
SMTO10 Walking and Cycling Audits Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.	Refer to PUNCH documentation for a full breakdown of walking and cycling facilities within the environs of the proposed development.
SMT27 Car Parking in Residential and Mixed Use Developments (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed-use developments	Appendix 5 Table 2 requires a maximum of one per dwelling which equates to 284 no. car parking spaces for the proposal (1 per unit). The proposed 138 apartment car parking spaces equates to a ratio of 0.52 per unit in accordance with this policy. This is considered an appropriate quantum of parking given the site's central and accessible location, the variety of public transport options for the site, the facilities in the area and the provision of shared cars in the location.
SMT29 Expansion of the EV Charging Network To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy	EV Charging Infrastructure will be provided for 100% of parking spaces allocated to dwellings and car share and for 50% of all spaces serving apartment units.
SMT33 Design Manual for Urban Roads and Streets 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 (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.	A DMURS Statement prepared by the engineers is included with the planning application. The proposed development achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. Permeability for pedestrians and cyclists is prioritised throughout the scheme with pathways through the public open spaces.
SMT34 Street and Road Design To ensure that streets and roads within the city are designed to balance the needs and protect the	

safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.	A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted at the main entrance to ensure a predominantly car free environment.

Chapter 9: Sustainable Environmental Infrastructure and Flood Risk

Policy	Evaluation of Consistency
SI2 Integrating Water Services with Development To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.	Communication has taken place with Irish Water for the provision of drinking water, water conservation and drainage infrastructure. A Confirmation of Feasibility is submitted as part of this submission. Please refer to the Engineering Assessment Report for information on the proposed foul and surface water drainage systems.
SI3 Separation of Foul and Surface Water Drainage Systems To require all new development to provide separate foul and surface water drainage systems.	
SI4 Drainage Infrastructure Design Standards To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).	The proposed development complies with these standards Please see the PUNCH Consulting Engineers Engineering Planning Report.
SI6 Water Conservation To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.	Best practice water conservation and demand management measures are incorporated into the scheme.
SI14 Strategic Flood Risk Assessment To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.	The Flood Risk Assessment by PUNCH has carried out an SFRA. This addresses these items in detail and identifies that the development falls in Flood Zone C, therefore a Justification test or a Stage 3 Detailed Flood Risk Assessment is not required.
SI15 Site-Specific Flood Risk Assessment	

All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with: • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan. • The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change and those associated with existing flood defences. The SSFRA will include site specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA. • On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of	

flooding which do not have existing development on them.	
SI20 Basement Flood Risk Management That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).	Please refer to the Basement Impact Assessment prepared by PUNCH submitted with this submission.
SI21 Managing Surface Water Flood Risk To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.	Please see the Engineering Report by PUNCH which sets out the flood risk management and SuDS measures throughout the site. The proposed development includes SuDs components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving. It is noted that this proposal will improve the existing situation on this site.
SI22 Sustainable Drainage Systems To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.	
SI23 Green Blue Roofs To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green & Blue Roof Guide (2021) which is summarised in Appendix 11.	
SI25 Surface Water Management To require the preparation of a Surface Water Management Plan as part of all new	The proposal has been designed in accordance with the council's surface water management guidance.

developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.	
SI26 Taking in Charge of Private Drainage Infrastructure To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be designed to taking in charge standards).	The proposed drainage infrastructure will comply with standards set out in Greater Dublin Regional Code of Practice for Drainage Works. The proposed development does not include any lands to be taken in charge.
SI29 Segregated Storage and Collection of Waste Streams To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).	Please see Operational Waste and Recycling Management Plan was prepared by AWN.
SI30 Waste Management in Apartment Schemes To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or and any future updated versions of these guidelines produced during the lifetime of this plan).	
SI37 Noise Sensitive Development To give careful consideration to the location, design and construction of noise sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance.	A Noise Survey prepared by AWN is submitted. The report recommends mitigation measures which ensure that noise disturbance is minimised both during the operational and construction phases.
SI42 Light Pollution To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.	The lighting proposal as designed by OCSC will not result in unnecessary, inappropriate or excessive artificial lighting. This has been designed in accordance with the recommendations by Altemar. Please refer to the EcIA for further information.
SI43 Energy Efficient Lighting	As set out in the public lighting report by OSCS appropriate public light is provided to ensure

To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.	security and safety while also supporting the ecology in the area.

Chapter 10 – Green Infrastructure and Recreation

Policy	Evaluation of Consistency
GI6 New Development / New Growth Areas To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.	All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site. The proposal has been designed to incorporate SUDS features which naturally reduce pollutants and improve water quality.
GI14 Ecological / Wildlife Corridors To maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.	Please refer to the AA Screening, NIS, EcIA and CEMP prepared by Altemar and submitted as part of this application.
GI16 Habitat Creation and New Development That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.	Public and communal spaces will be landscaped and planted with native species of trees and shrubs to enhance biodiversity on site. The proposal has been designed to incorporate SUDS features which naturally reduce pollutants and improve water quality. Blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving. The Bat Assessment (included in the EcIA) recommends roost creation, restoration or enhancement to provide appropriate replacements for roots to be lost or damaged.
GI17 Habitat Restoration To increase the percentage of restored and naturalised areas on public land in the city. That	

new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.	
GI18 Minimise Impact – Light and Noise To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of sensitive species such as bats (see also Section 9.5.9 Public & External Lighting).	The lighting proposal will not result in unnecessary, inappropriate or excessive artificial lighting. The lighting proposal has been assessed as part of the Bat Assessment prepared by Altemar and is compliant.
GI28 New Residential Development To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.	The provision of a new public open space will further enhance and promote the public amenity space in the area and provides sufficient amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes. Please refer to the Rationale section of this report where the open space provision is discussed.
GI29 Protect Character of River Corridors To protect, maintain, and enhance the watercourses and their river corridors in the city and to ensure that development does not cover or encroach upon rivers and their banks. To maintain natural river banks and restore them as part of any new development. The creation and/or enhancement of river corridors will be required and river restoration opportunities where possible will be supported to help improve water quality, and ecology, provide natural flood relief as well as providing amenity and leisure benefits.	The existing lake will be protected and maintained. The proposed residential development will not encroach upon the lake.
GI30 Maintain and Improve Connectivity of Freshwater and Estuarine Habitats/EU Birds and Habitats To conserve, maintain and restore freshwater and estuarine habitats which are of importance for species listed in the annexes of the EU Birds and Habitats Directives and to ensure connectivity of these in accordance with Article 10 of the EU Habitats Directive.	Please refer to the AA Screening, NIS and EcIA prepared by Altemar who have included the lake in their study of the site and surveys.
GI40 Tree Planting - General To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in	All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site. Landscaped areas will be planted with native species of trees and shrubs to enhance biodiversity on site. The Landscape Report includes a planting schedule which outlines the species of trees and

the interests of natural heritage, amenity, environmental quality and climate resilience.	plants which will be part of the schemes landscaping.
GI41 Protect Existing Trees as Part of New Development To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.	The proposed development has been designed to protect and retain as much of the mature trees as possible. The Arborist report carried out by The Tree File states that the proposed development aspires to retain at least 192 of the 213 trees reviewed, accounting for the immediate loss of all category 'U' trees. This represents a retention rate of nearly 98% of the site's sustainable trees.
GI52 Children's Playing facilities in New Residential and Mixed Developments To seek the provision of children's playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.	The diverse range of open space provided within the scheme provide opportunities for informal recreation and play which will be overlooked by the proposed houses and adjacent blocks.

Chapter 12: Culture

Policy	Evaluation of Consistency
CUO25 SDRAs and large Scale Developments All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.	Urban Agency's Development Summary & Schedule provides a breakdown of the community, cultural and arts provision throughout the scheme. The proposed development includes for a provision of 1413.6 sqm of community, cultural and arts facilities for residents and potential visitors. This is in excess of this 5% required. The community, cultural and arts provision includes indoor (87%) and outdoor space (13%) and comprise the following amenities: Block A: 488.3sqm Block B: 389.6sqm Pavillion: 336.7sqm External: 199qm The design team held a workshop with Ray Yeats (Dublin City Council City Arts Officer) on the 16th of January 2023 who provided guidance on the approach.

	In line with this advice a Cultural Infrastructure Assessment has been completed and submitted with this Planning Application. This confirms that the proposed uses are appropriate for the area and meet an identified need for the area.
CUO30 Co-Design and Audits Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (CUO44 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.	A Cultural Infrastructure Assessment and a Social Infrastructure Audit have been completed by Turley and submitted with this planning application. This confirms that the proposed uses are appropriate for the area and meet an identified need for the area.
CUO32 Artist Live-Work Space To support the development of a feasibility model and pilot project for provision of artist live-work space during the lifetime of the Development Plan and to seek to provide a clear community benefit as part of the project.	The proposed development incorporates Cultural, community and arts spaces within Block A and B of the scheme. It is intended that these spaces will support local creative industries within the cultural and artistic sectors. Please refer to the Cultural Infrastructure Assessment prepared by Turley.

Chapter 15: Development Standards

Policy	Evaluation of Consistency
15.3 Environmental Assessment - EIA/AA/Ecological Impact Assessment	
15.3.1 Environmental Impact Assessment Environmental Impact Assessments (EIA) consider whether development projects either alone or in combination are likely to have significant effects on the environment.	The proposed development is below the thresholds of Schedule 5 of the Planning and Development Regulations. A preliminary examination for EIA and EIA Screening was conducted and confirms that an EIAR is not required.
15.3.2 Appropriate Assessment Appropriate Assessment (AA) under Article 6 of the Habitats Directive considers whether or not a proposed plan or project would adversely affect the integrity of a European Site.	Please refer to the AA Screening and NIS prepared by Altemar.
15.3.3 Ecological Impact Assessment An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	Please refer to the EcIA prepared by Altemar.

15.4 Key Design Principles	
15.4.1 Healthy Placemaking All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city	The proposed development is located in close proximity to a high-quality Dublin Bus public transport corridor. Terenure is a well-established urban village which consists of a mixed-use environment. The proposed development further enhances the urban village by offering a mix of studio, 1 bed, 2 bed and 3 bed apartments, and 4 bedroom houses. The provision of cycle parking within the scheme promotes a modal shift to active travel methods such as walking and cycling.
15.4.2 Architectural Design Quality Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.	The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm.
15.4.3 Sustainability and Climate Action Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.	Please refer to the Energy and Sustainability Report prepared by OCSC. We also refer you to the Operational and Resource Waste Management Plan which set out the approach to waste management once the site is operational.
15.4.4 Inclusivity and Accessibility Development proposals, including all new large scale developments…… must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.	The proposed development is designed to be accessible to all.
15.4.5 Safe and Secure Design All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).	The scheme is designed to ensure residents and visitors are interacting with a safe and secure environment. Public open space and communal areas are designed so that active passive surveillance is in operation
15.5.4 Height Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.	Please refer to the height strategy assessment located within the Urban Agency's design statement.
15.5.5 Density New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood.	The proposed development is achieving a density of 107 uph net. This density is in line with the site conditions, the need for compact growth and the policies of a 15-minute city. This density makes best use of this scarce resource land.

<table>
<tr><td></td><td>Please refer to the section above on the Apartment Guidelines 2023 and the Compact Guidelines 2024 where this is addressed.</td></tr>
<tr><td>15.5.6 Plot Ratio and Site Coverage
Appendix 3, Table 2 provides indicative plot ratio and site coverage standards.
<table><tr><th>Area</th><th>Indicative Plot Ratio</th><th>Indicative Site Coverage</th></tr><tr><td>Central Area</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration Area</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation Area</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential Area</td><td>1.0-2.5</td><td>45-60%</td></tr></table></td><td>Net plot ratio is 1.06

Net Site coverage is 30%

It is noted that these are indicative standards. The plot ratio is appropriate for this site however, the site coverage is lower than the standards, given the site’s institutional zoning and the provision of areas of open space along with the protection of the privacy of the neighbours to the north, and other contextual items it was considered a priority for this site.</td></tr>
<tr><td>15.5.7 Materials and Finishes
All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.</td><td>Please see the Architecture Design Statement and Building Life Cycle for further information.</td></tr>
<tr><td>15.5.8 Architectural Design Statements
Table 15-2: Information Requirements for Design Statements
<table><tr><th>Residential Developments</th></tr><tr><td>Site Location and Description</td></tr><tr><td>Context and Setting</td></tr><tr><td>Urban Design Rationale</td></tr><tr><td>Design Evolution / Alternatives Considered</td></tr><tr><td>Block Layout and Design</td></tr><tr><td>Site Connectivity and Permeability</td></tr><tr><td>Height, Scale and Massing</td></tr><tr><td>Materials and Finishes</td></tr><tr><td>Open Space (Private, Communal, Public)</td></tr><tr><td>Public Realm Contribution</td></tr><tr><td>Compliance with Internal Design Standards</td></tr><tr><td>Daylight and Sunlight</td></tr><tr><td>Overlooking, Overbearing, Overshadowing</td></tr><tr><td>Car and Cycle Parking</td></tr><tr><td>Management/Lifecycle Report</td></tr><tr><td>Compliance with DMURS</td></tr><tr><td>Safety and Security</td></tr><tr><td>Universal Access</td></tr></table></td><td>UA Architects have prepared an Architectural Design Statement which analyses the context and constraints of the site and includes a detailed design of the development. The Design Statement provides all of this information listed in this section.</td></tr>
<tr><td>15.5.9 Models and Photomontages</td><td>Modelworks have completed the verified views and CGI’s for the site. These provide a realistic view of what the development will look like once it is completed.</td></tr>
<tr><td colspan="2">15.6 Green Infrastructure and Landscaping</td></tr>
<tr><td>15.6.2 Surface Water Management and SuDs
All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council’s Surface Water Management Guidance</td><td rowspan="2">The surface water strategy within the Engineering Planning Report prepared by PUNCH has been updated to include the provision of green roofs, blue roofs and various other sustainable measures.</td></tr>
<tr><td>15.6.3 Green / Blue Roofs</td></tr>
</table>

Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23.	
15.6.5 Urban Greening All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc	Please refer to the landscape architecture pack prepared by NMP Landscape Architects.
15.6.7 Landscape Design Rationale The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications	NMP Landscape Architects have prepared a Landscape Report as part of this planning application. The report provides details on the following items: Public open space provision, landscape proposals, boundary details, roof terraces, planting schedule etc. Please see the Landscape Report for more detailed information.
15.6.8 Landscape Plans and Design Reports Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	
15.6.12 Public Open Space and Recreation	The proposals public open space provision amounts to 6989.35m2 which is the equivalent of 26.5% of the net site area (2.64ha).
15.6.13 Boundary Treatments Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	UA Architecture and NMP Landscape Architecture documentation provide detailed design of boundary treatments.
15.7 Climate Action	
15.7.2 District Heating	An Energy and Sustainability Report has been prepared by OCSC Engineering Design Partnership. Please refer to this document for information on Building Regulations Compliance and DEAP Methodology and Analysis.
15.7.3 Climate Action and Energy Statement proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.	
15.8 Residential Development	
15.8.1 Quality/Making Sustainable Neighbourhoods Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans -	The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.

Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).	
15.8.2 Community and Social Audit All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development.	Turley's have prepared a Social Infrastructure Audit as part of this planning application providing demographic profile and assesses existing social infrastructure within a 750 m radius. The Social Infrastructure Audit has identified a broad range of services and facilities to support the proposed development. This includes 47 no. social infrastructure facilities within the 750 m study area. The largest area of these is sports and recreation (15 no. facilities) followed by health (10 no. facilities). This provision is considered be significant; aligned to the site's location within the Dublin City area.
15.8.3 Schools planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand.	In relation to Schools, in total, 2 no. primary schools providing 1,020 spaces, and 3 no. secondary schools providing 2,043 no. spaces exist within the 750 m study area. An additional 2 no. education facilities were identified within 1 km (1 no. primary school and one secondary school). Within the wider 2 km context, 17 no. additional schools have been identified providing a total of 10 primary schools / 3,623 no. primary school spaces and 7 secondary schools / 4,349 no secondary school spaces. Please refer to the Turley report for further details.
15.8.4 Childcare In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.	A Childcare Assessment Report has been carried out by Turley to determine the existing childcare provision in the study area and to ascertain the need, or likely demand, if any, for a childcare facility to be provided as part of the proposed development. The report concluded that the demand for childcare arising from this development is considered to be very low, comprising a demand for 3 to 6 no. childcare spaces in accordance with the Childcare Guidelines 2001 and the Apartment Guidelines 2022. As required by the DCDP (2022-2028), childcare facilities within a

	1km study area have been reviewed and confirmed by telephone survey at a robust response rate of 82%. This survey confirms that there are 11 no. childcare facilities operating within 1 km of the subject site providing 550 no. childcare spaces and a vacancy rate of 8 no. children. Notwithstanding this, a creche of c.100.0sqm to accommodate 17 no. children is proposed on the ground floor of Block D with an external play area of c.153sqm. The proposed creche is located to the north-east corner the of site which is considered to be the most optimal position due to its proximity in relation to the access road and drop off area, and to ensure privacy.
15.8.6 Public Open Space Table 15-4: Public Open Space Requirements for Residential Development Landuse / Zoning: Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14) — Requirement (minimum): 10% Residential development (Z12) (Z15) — 25%	The proposal includes 26.5% public open space within the net site area and over 56% of the gross site area which exceeds the requirements of this policy.
15.8.8 Play Infrastructure In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition	As shown in the NMP Landscape Masterplan drawing a children's play area is located in the western corner of the proposed development.
15.8.11 Management Companies/Taking in Charge	The proposed development will not be taken in charge.
15.11 House Developments	
15.11.1 Floor areas Houses shall comply with the principles and standards outlined in Section 5.3: 'Internal Layout and Space Provision' contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)	Please refer to the HQA prepared by Urban Agency Architects. The proposed house floor areas are in full compliance of the QHSC 2007.
15.11.2 Aspect, Daylight / Sunlight and Ventilation The orientation and layout of house units should maximise the use of natural daylight and sunlight as much as possible. Where feasible, the main habitable rooms (living / kitchen) should have south and/or west facades. Rear private garden should be sufficiently sized and orientated to	Please refer to the Sunlight Daylight Analysis prepared by OCSC. The report shows that all units pass the ADF requirements and the newer BER Guide 3rd Edition daylight requirements.

ensure direct sunlight access is achieved for part of the day on March 21st. Living rooms shall not be lit solely by roof lights. Bedrooms solely lit by roof lights will be considered in certain circumstances on a case by case basis. All habitable rooms must be naturally ventilated and lit. Further details and guidelines for Daylight and Sunlight Assessments are set out in Appendix 16.	
15.11.3 Private Open Space A minimum standard of 10 sq. m. of private open space per bedspace will normally be applied. A single bedroom represents one bedspace and a double bedroom represents two bedspaces. Generally, up to 60-70 sq. m. of rear garden area is considered sufficient for houses in the city. In relation to proposals for house(s) within the inner city, a standard of 58 sq. m. of private open space per bedspace will normally be applied. These standards may be relaxed on a case by case basis subject to a qualitative analysis of the development.	Please refer to the HQA prepared by Urban Agency Architects. All housing unit's private open space meet or exceed the standard as set out in the development plan.
15.11.4 Separation Distances (Houses) At the rear of dwellings, there should be adequate separation between opposing first floor windows. Traditionally, a separation of about 22 m was sought between the rear first floor windows of 2-storey dwellings but this may be relaxed if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent occupiers. Careful positioning and detailed design of opposing windows can prevent overlooking with shorter back-to-back distances and windows serving halls and landings which do not require the same degree of privacy as habitable rooms.	Please refer to the Site Layout Plan prepared by Urban Agency Architects. All units meet separation distance standards.
15.9 Apartment Standards	
15.9.1 Unit Mix Specific Planning Policy Requirement 1 states that 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 unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.	This proposed apartment development provides for 10 no. studios (4%), 117 no. 1 beds (41%), 129 no. 2 beds (45%) and 9 no. 3 beds (3%). The proposed unit mix is in compliance with SPPR1.
15.9.2 Unit Size / Layout	UA Architects have prepared a Housing Quality Assessment which outlines unit area requirements vs what each apartment achieves.

Table 15-5: Minimum Floor Area Requirements for Apartments Unit Type / Bedspace / Floor Area Requirement (min) Studio / 1 bedspace / 37 sq. m. 1 bed / 2 bedspaces / 45 sq. m. 2 bed / 4 bedspaces / 73 sq. m. 3 bed / 5 bedspaces / 90 sq. m.	All units are in accordance with this section of the development plan.
15.9.3 Dual Aspect Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations	In accordance with the development plan, 63% of the apartment units are dual aspect.
15.9.4 Floor to Ceiling Height A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided.	The proposed development meets this minimum ceiling height standard. A ceiling height of 2.7m has been applied across all floors throughout the development.
15.9.5 Lift, Stair Cores and Entrance Lobbies Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.	The residential floors of the proposed development provides a maximum of 12 no. units per core or less.
15.9.6 Internal Storage Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	The Housing Quality Assessment prepared by UA Architect's demonstrates compliance with internal storage standards.
15.9.7 Private Amenity Space Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	The Housing Quality Assessment prepared by UA Architect's demonstrates compliance with private amenity space standards.
15.9.8 Communal Amenity Space The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	The Development Summary & Schedule prepared by UA Architect's outlines residential amenity provision. The scheme provides 4492.2m2 of external communal open space.
15.9.9 Roof Terraces	The scheme provides roof terraces at Block B and Block C.
15.9.10 Internal Communal Facilities	The proposed scheme provides 301.3 residential amenity space. The scheme provides a further

Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.	1214.6sqm internal communal facilities for community uses which can also be used by residents. Please see the Development Summary & Schedule prepared by UA Architect's for a full breakdown of facilities.
15.9.11 Security New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.	The provision of public and communal open space as well as residential amenities throughout the development encourages active passive surveillance.
15.9.12 Access and Services Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.	Pedestrian and vehicular access points are clearly identified. Vehicles are encouraged to enter the basement from the outset. The proposed development is designed in accordance with Part M building regulations.
15.9.13 Refuse Storage Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities. All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy	An Operational Waste & Recycling Management Plan prepared by AWN is submitted as part of this planning application. Please refer to the OWRMP and UA's Architect's drawings for the location and size of bin storage areas.
15.9.14 Lifecycle Reports All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.	GAA have prepared a Building Life Cycle Report as part of this planning application.
15.9.15 Operational Management and Maintenance All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.	A Building Life Cycle Report has been prepared as part of this planning application. This report details the maintenance and management of the scheme.
15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high	OCSC prepared a Microclimatic Wind Analysis and Pedestrian Comfort Report which is submitted as part of this planning application. The report determines that the proposed development will *"not negatively impact on its receiving environment in terms of wind microclimate".*

level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.	Please refer to the OCSC Engineering Design report 'Daylight and Sunlight Analysis' which has been submitted as part of this planning application. The report concludes that the scheme is entirely in compliance with the BRE Guide 3rd edition. AWN have completed a Noise report. A baseline noise survey has been undertaken at the development site to determine the existing noise environment at the site. An inward noise assessment has been undertaken based on the results of the noise survey as recommended in the ProPG: Planning & Noise guidance document. This report has found that during the construction phase, potential noise levels are predicted to be significant, however mitigation measures have been recommended so any impacts can be reduced. During the operational phase, noise associated with the proposed development has been considered. There is predicted to be no change in noise levels associated with vehicular traffic on the road network local to the development.
15.9.16.1 Daylight and Sunlight A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.	
15.9.16.2 Wind A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.	
15.9.16.3 Noise All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014.	
15.9.17 Separation Distances (Apartments) Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis.	The proposed development is in excess of 22m to its nearest adjoining neighbours to the north. The proposed blocks all achieve a minimum of 22m separation distances. It is also note, given the nature of the site and the slight angle of the buildings none of these windows are directly opposing rear windows. There is no undue loss of privacy as a result of this development.
15.15 Built Heritage and Archaeology	
15.15.1.3 Best Practice The development shall be carried out in accordance with the documents listed in this section of the development plan.	The proposed development is in accordance with documents listed.
15.15.1.4 Basements New basement development in the medieval core and known medieval sites shall be avoided. Approved basements may be rescinded where undue damage to in situ archaeological deposits will occur as a result.	PUNCH prepared a Basement Impact Assessment which is submitted a spart of this planning application.
15.18 Environmental Management	
15.18.1 Construction Management All developments comprising 30 or more housing units and commercial developments (as well as	PUNCH have prepared a Management Plan submitted as part of this pre planning application. This includes advise on Construction

institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final construction management plan will be required to be agreed with the Planning Authority	Traffic Management and will be finalised following the grant of a permission. The construction management plan includes a Traffic Management Plan which will be finalised as part of the final submission.
15.18.1.1 Construction Traffic Management Plan A Construction Traffic Management Plan (CTMP) is a key document that aims to reduce possible impacts which may occur during the construction period of a proposed development. An applicant/developer is responsible for ensuring construction activities are managed in accordance with the CTMP.	A phasing plan is not required for this proposed development as it is proposed to complete this development within a single phase.
15.18.1.2 Considered Construction Considered Construction seeks to improve the image of the construction industry which requires registered contractors to commit to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce.	
15.18.1.3 Phasing Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.	
15.18.1.4 Hours of Operation On sites where noise generated by construction would seriously affect residential amenity, the site and building works must be carried out between 0700 and 1800 hours Monday to Friday only, and between 0800 and 1400 hours on Saturdays only. No works shall be carried out on Sundays or bank holidays.	Section 14 of the Construction Management Plan states the following: *"Construction work will take place during normal working hours as follows:* • *Monday to Friday 07.00 – 18.00* • *Saturday 08.00 – 14.00"* The design team welcome a condition by the council to alter hours of operation if necessary.
15.18.2 Waste Management All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan.	AWN prepared an Operational Waste & Recycling Management Plan submitted as part of this application.
15.18.4 Basements It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is	PUNCH Consulting Engineers prepared a Basement Impact Assessment for the proposed development.

considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.	
15.18.9 Noise Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2018– 2023 when assessing planning applications (see also Section 9.5.8: Noise Pollution). Where it is considered that a proposed development is likely to create a disturbance due to noise, a condition may be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.	AWN prepared an Environmental Noise Survey which is submitted as part of this planning application. This survey outlines mitigation measures which must be adhered to in order to prevent noise disturbance on the surrounding area.
15.18.10 Air Quality All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.	An air quality assessment will be included in the final Construction Management Plan submitted with this application in the final stage.
15.18.11 Ground Investigation Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application.	Please refer to the documentation prepared by PUNCH Consulting Engineers.
15.18.14 Flood Risk Management All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail	Please refer to the SSFRA prepared by PUNCH consulting engineers.

Appendix 3 Achieving Sustainable Compact Growth Policy for Density and Building Height in the City	
At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height.	The proposal includes heights up to 6 storeys which is within this range.
The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity.	The proposed development respects the existing character of the area and has been designed to respect both existing and future residential amenity.
All proposals for higher densities must demonstrate how the proposal contributes to	The proposal will bring this vacant site into an active use.

<table>
<tr><td>healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods</td><td>It provides an attractive new public open space and opens up the lake and woodland area to the wider community and will create a destination point, contributing to the neighbourhood.</td></tr>
<tr><td>As a general rule the following density ranges will be supported in the city.<table><tr><td>Location</td><td>Net Density Ranges (uph)</td></tr><tr><td>City Centre and Canal Belt</td><td>100-250</td></tr><tr><td>SDRA</td><td>100-250</td></tr><tr><td>SDZ/LAP</td><td>As per SDZ Planning Scheme/LAP</td></tr><tr><td>Key Urban Village</td><td>60-150</td></tr><tr><td>Former Z6</td><td>100-150</td></tr><tr><td>Outer Suburbs</td><td>60-120</td></tr></table></td><td>The proposed density of 107 uph net is in line with the density ranges provided in the development plan. The proposed development is located in the Outer Suburbs which allows a density range of 60-120</td></tr>
<tr><td>There will be a general presumption against schemes in excess of 300 units per hectare</td><td>The proposed density of 107 uph is well below 300uph and is considered acceptable for this site.</td></tr>
<tr><td>All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage</td><td>The proposal has a density of 107 units per ha net, there is 284 units across this site which is c.626 bedspaces per hectare, a site coverage of 30% and a plot ratio of 1.06.</td></tr>
<tr><td>Indicative Plot Ratio and Site Coverage set out below.<table><tr><td>Area</td><td>Plot Ratio</td><td>Site Coverage</td></tr><tr><td>Central</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential</td><td>1.0-2.5</td><td>45-60%</td></tr></table></td><td>Net plot ratio is 1.06
Net site coverage is 30%

It is noted that these are indicative standards. The plot ratio is appropriate for this site however, the site coverage is lower than the standards, given the site’s institutional zoning and the provision of areas of open space along with the protection of the privacy of the neighbours to the north, and other contextual items it was considered a priority for this site.</td></tr>
<tr><td>Higher plot ratio and site coverage may be permitted in certain circumstances such as:
• Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.
• To facilitate comprehensive re-development in areas in need of urban renewal.
• To maintain existing streetscape profiles.
• Where a site already has the benefit of a higher plot ratio.
• To facilitate the strategic role of significant institution/employers such as hospitals</td><td>The proposal provides a plot ratio and site coverage in line with the ranges for the subject site.</td></tr>
</table>

All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3 of Appendix 3 (Achieving Sustainable Compact Growth Policy for Density and Building Height in the City).	The proposal has been assessed against the criteria and are found to be in compliance with Table 3 below.
Public Transport Corridors There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including: • Bus connects/Core Bus Corridors (CBC's) • Luas • Metrolink • DART Development proposals will primarily be determined by reference to the proximity of new public transport infrastructure and to the area character. Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan. Highest densities will be promoted at key public transport interchanges or nodes. The capacity of public transport will also be taken into consideration in considering appropriate densities and must be demonstrated by the applicant, particularly where such public transport infrastructure is in the pipeline and not yet developed. Where a proposal for increased height and density is planned adjacent to proposed public transport infrastructure, the applicant must consider appropriate phasing and sequencing of development to ensure that an appropriate scale and intensity of development, coupled with adequate social and physical infrastructure, is delivered in tandem with the delivery of such public transport infrastructure. It is acknowledged that many sites along such transport corridors are smaller infill sites. Particular regard must be had to ensure that proposals are of a coherent scale and provide a sustainable and viable extension to the existing urban fabric.	The proposed development is located 1 minute walk from the Fortfield Road bus stop no.2397 which is served by the 54A bus. The site is also 0.5km from Bus Stop 1159 on Templeogue Road and the associated availability of high frequency bus routes, including the increased service capacity associated with the proposed 'Tallaght to Terenure' Core Bus Corridor route.
Masterplans	The site is an undeveloped site located within the suburban village Terenure, Dublin and there

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared. The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publicly accessible and private open spaces will fit within the existing and planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open space quantums, sunlight, daylight, visual impact and wind effects. Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan. Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.	is limited scope within the site create new routes to the wider area. The proposed housing and apartment blocks will provide a strong urban frontage along Fortfield Road. The architectural design statement and includes a Campus Masterplan. This demonstrates the site constraints that led to the proposed design, the relationship of the proposed development with the existing situation and, indicatively, the potential development in the next 50 and 100 years. The proposal will provide a high-quality residential housing and apartment development within the existing built-up environment of Dublin City. The proposal will provide public and communal open spaces and has been designed to be as permeable and walkable for pedestrians as possible. It is intended that the proposal will be constructed in one phase. Please see the drawings and documents prepared by PUNCH for details on the surface water management. CGIs and photomontages have been prepared by Modelworks.
Landmark/tall buildings are generally considered to be those that are substantially taller than their surroundings and cause a significant change to the skyline. They are typically buildings greater than 50 metres in height. In terms of suitable locations, it is considered that landmark/tall building proposals are most appropriate in locations that are identified as a significant public transport interchange and/or areas for large scale regeneration and redevelopment; that are well connected centres of employment, which have the capacity to create	The proposed development is not considered to be a landmark building.

their own character and identity and where the existing character of the area would not be adversely affected by the scale, mass and height of a landmark/tall building.	

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale	
Objective 1: To promote development with a sense of place and character Enhanced density and scale should: • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well-considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed.	The text, diagrams and illustrations in Building Height Report prepared by Urban Agency Architect's and also in the supporting information submitted with this application for planning permission, demonstrate compliance with this objective. By drawing inspiration from the local built and natural heritage, the design respects development constraints and aims to strengthen community ties through thoughtful outdoor spaces and amenities, contributing to a healthy placemaking environment. The proposal's distinctive architectural features and varied building heights create visual interest without overwhelming the area, allowing for an appropriate transition in scale that blends seamlessly with adjacent structures. The project prioritises accessibility, situating residences in a vibrant location in close proximity to a number of public transport options, including future planned Bus Connect routes and existing bus services (less than 500m from the entrance of the proposal). The proposal will include a public open space to the south east of the site, adjacent to the (currently landlocked) lake. This will provide the opportunity to create a public open space which the wider community can enjoy. Moreover, the design avoids monolithic structures by incorporating features that promote variety and delineates setbacks that are proportionately scaled to enhance both aesthetics and functionality, positioning

	Fortfield Road as a model for future residential developments. The apartment blocks, houses, open spaces, creche and community uses have been carefully designed and located to minimise any negative impact on the adjacent residential properties. The blocks have been stepped back at the northern portion of the site to minimise overlooking and the impact on daylight and sunlight.
Objective 2: To provide appropriate legibility Enhanced density and scale should: • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The proposed development will provide a strong frontage to the western boundary of the subject site along Fortfield Road, replacing a currently non-active frontage which comprises a concrete wall. The increased density will help create a sense of enclosure and sense of place for pedestrians walking along this road. The openings proposed within the boundary wall will enhance permeability and will create new entrances to the public open space and existing lake.
Objective 3: To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should: • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	The proposed development will provide a strong frontage to Fortfield Road and the proposed public open space to the south. This will provide a good sense of enclosure to the proposed public open space. The routes through the site will all be overlooked by the proposed apartment blocks. This will ensure adequate passive surveillance is provided to the public realm. The heights and streets provide an appropriate street width to building height maintaining a ratio of under 1:1.5 with Fortfield Road. The development avoids the creation of towering canyons that overwhelm pedestrian experiences, instead fostering a sense of human scale. The design incorporates varied facade treatments and strategically placed

	entrances to promote active uses at street level, enhancing passive surveillance and inviting community interaction. Furthermore, public spaces are designed with careful consideration of enclosure and connectivity, creating vibrant thoroughfares that encourage social engagement while ensuring safety and visual interest, all of which significantly elevate the overall urban landscape.
Objective 4: To provide well connected, high quality and active public and communal spaces Enhanced density and scale should: • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards, • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.	The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport with a reduced car parking ratio provided primarily out of sight at basement level. Cycling parking facilities are also located within the basement. The blocks have been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties. The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight throughout the year in line with BRE guidance Please refer to the Daylight Sunlight & Overshadowing Assessment prepared by OCSC. The proposed development utilizes the permitter block as a design feature to create pleasant communal open space areas, maintaining privacy from the public. The wind / microclimate study prepared by OCSC demonstrates that there will not be a negative wind impact resulting from the proposed development. The spaces and streets have all been designed to be people friendly and accessible.
Objective 5: To provide high quality, attractive and useable private spaces Enhanced density and scale should:	There is a high quality of public, communal and private open spaces provided as shown on the 'General Arrangement – Total Open Space' dwg. no L1-101 prepared by NMP

• not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development.	Landscape Architects. All of these spaces are safe, accessible, and inviting The open spaces will be managed in accordance with the Operational Management Plan prepared by GAA. The Daylight Sunlight & Overshadowing Assessment prepared by OCSC demonstrates that the proposed units and open spaces (public and communal) all achieve appropriate levels of daylight. The wind microclimate study demonstrates that there will not be a negative wind impact resulting from the proposed development. The proposed development has been designed to ensure passive surveillance is provided to the public spaces and communal open space while also ensuring a high level of privacy is maintained for the proposed units by using the blocks orientation and layout, buffering and screening, balcony design and height and building setbacks.
Objective 6: To promote mix of use and diversity of activities Enhanced density and scale should: • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, • contribute positively to the formation of a 'sustainable urban neighbourhood', • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle.	The subject site is located within a short walking distance of a range of amenities such as retail, restaurants, public houses and employment hubs. The Social Infrastructure Audit prepared by Turley discusses this in further detail. Therefore, it was not considered appropriate to provide mixed uses on the subject site, other than the proposed Community Cultural and Arts provision. The Cultural Infrastructure (Impact) Assessment prepared for by Turley demonstrates the demand for the Community, Cultural and Arts use. The proposed development will provide further residential units in this existing suburb which will support the range of facilities and amenities in the area by increasing the local population, generating additional demand for facilities and amenities in the area and provide housing for people to live.

	The proposed mix of studios, one, two and three bed apartments units and 4 bed housing units will improve the housing supply quality in the area and provide different options for people at different stages of the life cycle.
Objective 7: To ensure high quality and environmentally sustainable buildings Enhanced density and scale should: • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16), • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7. • include an assessment of embodied energy impacts – see Section 15.7.1	The Architectural drawings and schedules, the Architectural Design Statement prepared by Urban Agency along with the Daylight, Sunlight and Overshadowing Assessment prepared by OCSC demonstrate that the proposed development has been modulated and oriented to maximise access to natural daylight, ventilation, privacy and views to minimise overshadowing and loss of light. The Daylight, Sunlight and Overshadowing Assessment also demonstrates that the proposed development does not compromise the solar gain of adjacent buildings. The Architectural Elevations demonstrate that any plant shown at roof level is minimal in scale. The design and layout ensures that 63% of units are dual aspect. Please refer to the Architectural drawings and Design Statement prepared by Urban Agency for further details on the materials proposed. OCSC have prepared a Climate Action and Energy Statement which includes details of sustainable technologies, energy efficiency and climate resilience. This report includes an assessment of embodied energy impacts. Please refer to the SuDS plans and Engineering Planning Report prepared by PUNCH Engineering for details on SuDS solutions within the development.

Objective 8: To secure sustainable density, intensity at locations of high accessibility Enhanced density and scale should: • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	The subject site is well connected to the wider area with high quality, high frequency bus routes serving Fortfield Road and Templeogue Road to the south. The frequency, capacity and destinations is set out in the PTCA and the TTA submitted with this application. These documents confirm that there are bus services within 500m of the site which has buses running every ten minutes. The layout has been designed to provide the optimum layout for access and parking while providing a high-quality scheme that prioritises pedestrians and creates a human scaled place.
Objective 9: To protect historic environments from insensitive development Enhanced density and scale should: • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on keys views and vistas related to the historic environment.	The site is not located within an Architectural Conservation Area and there is no Protected Structure or National Monument. Identified on the site. The Cultural Heritage Assessment states at section 4.1.1.1 "*The proposed development will have no direct physical effect on known archaeological sites and monuments* *4.1.1.2 Potential Direct Effects on Unrecorded Archaeological Monuments or Features* *After an intensive programme of archaeological testing by the author of this report (as described herein) nothing of archaeological significance was noted at the subject site. The author considers that there is no significant potential for unrecorded sub-surface deposits surviving below ground at this location.* *4.1.1.3 Potential direct Impacts Architectural Sites* *The proposed development will have no direct physical effect on known architectural sites"* This report concludes that *"Nothing of archaeological significance was noted during testing. There will be no impact on the archaeological resource due to remaining works. No further archaeological mitigation is recommended. "* As shown in the Architects Design Statement and the photomontages, the site and its

	surrounding environment has the capacity to absorb the proposed development. Please refer to the Cultural Heritage Report and Historic Landscape Report submitted as part of this proposal. The Historic Landscape Report confirms that *"The proposed residential development is on a site that was predominantly concealed from the original focus of the designed landscape of the demesne. Thus its impaction on the remnants of the designed landscape is minimal. The intense landscaping proposals for the development adds much to the surrounding evolving environment of the suburban locale."*
Objective 10: To ensure appropriate management and maintenance Enhanced density and scale should • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc	A Life Cycle Report and an Operational Management Plan by GAA are both included with this application. These documents set out the management strategy for the scheme post construction in order to demonstrate how once operational, the mechanics of the property management, security, waste management and public realm maintenance will work in practice and be maintained to the highest standards.

Appendix 5 Transport and Mobility: Technical Requirements	
The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible.	The proposal has been designed to ensure pedestrian permeability within the site. The proposal includes new access through the site to the existing lake and woodland park.
A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network.	A Road Safety Audit has been carried out and is submitted with this application.
All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements.	Please see the auto track analysis prepared by PUNCH Consulting Engineers.
All vehicular access shall be considered, including private car, service, delivery and emergency vehicles, in addition to applicable vehicular access requirements.	
Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network.	Set down and turning areas for service vehicles are all provided within the site,
All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.	Please see the DMURS Compliance Statement prepared by PUNCH Consulting Engineers.

Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	Please see the Road Safety Audit prepared by PUNCH consulting engineers.
Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/ reduced provision of car parking to serve a development.	A Residential Travel Plan is submitted which demonstrates the proposed management strategy for the site, the alternative modes of transport and measures to promote a modal shift to more sustainable modes of transport.
The servicing requirements for any development should be established early in the preplanning process.	Please see the TTA by PUNCH which includes a Delivery and Service Management Plan. The application also includes appropriate auto track assessment for the site for a variety of different vehicles.
Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site	
For residential developments, details of access for service vehicles shall be considered at an early stage in the design process.	
Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated.	
Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.	Please see the Service and Delivery Access Strategy in the TTA and auto track analysis drawings submitted with the application.
For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information: • Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles; • Confirm the number, type and frequency of service vehicles envisaged for the development and detail the locations from which servicing will occur and how it will be managed; • Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site.	
Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries	The site is not immediately adjacent to a luas line.

and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined.	
Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time	A Residential Travel Plan is submitted with this application. This addresses items relating to car parking and car parking management.
Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements.	Car parking will not be sold with unit but will be assigned and managed separately. The car parking for the housing element of the scheme is proposed to be within the curtilage of the houses.
A management scheme for any visitor car parking shall also put in place.	Visitors will be discouraged from arriving by car. Please see the Residential Travel Plan.
Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.	Please refer to the Appendix E of the residential travel plan which contains a Letter from GoCar confirming that they intend to provide a car sharing service at this location.
The maximum standards for car parking provision are set out in Table 2.	Table 2 sets a maximum requirement but encourages reduced car parking provision. In line with the strategy and reflecting the sites location, in a central and highly accessible location it is appropriate to provide a reduced parking ratio of 0.57. the rationale for this is set out in detail in the TTA.
Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed).	Please see the TTA by PUNCH which sets out the census data, modal split and also reflects the provision of GoCar spaces and excellent public transport infrastructure within 10 minutes' walk of the site.
Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully	The bicycle stores are fully and easily accessible. The Architect's Design Rationale includes details on the location and accessibility of the bike stores. All the bikes stores and spaces are provided at ground level and in the basement. As well as a shared ramp, there is lift access for bikes to the basement.

accessible bicycle parking and is discouraged by Dublin City Council.	
Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated.	There are 611 no. bike spaces including cargo bike spaces provided throughout the development in a variety of locations easily accessible to each apartment block and each of which are accessible through a separate door. This creates a natural and logical segregation of the bicycle storage.
All new developments are required to fully integrate cycle facilities into the design and operation of the schemes, in accordance with Table 1.	Table 1 requires 565 no. bike parking spaces. This proposed development provides 610 no. bike parking which is in excess of this figure.
Cycle parking for residential apartment units shall be provided at a rate of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units. Relaxations of this standard may be considered in certain instances where the applicant can justify the proposed quantum having regard to location, quality of facilities, flexibility for future enhancement / enlargement and availability of alternative transport facilities.	
Secure bicycle parking stands shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such cycle stands shall be within 25 m of a destination for short-term parking (shops) and within 50 m for long-term parking (school, college, office). All long-term (more than three hours) cycle stands shall be protected from the weather. Cyclists shall be able to secure both frame and wheels to the cycle parking stand.	The cycle parking is provided at surface and basement level. They are located within a short distance from the entrances to the apartment blocks in secure shelters.
All on-street cycle stands shall be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism	The on-street short term bike parking are also provided and are designed to meet their basic function of preventing theft of vandalism.
Off-street storage/parking facilities shall provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision	The secure long term bike parking spaces will be easily accessible and will be lit appropriately to ensure a strong sense of safety and security.
Where high density cycle parking is provided in a secure location, stacked/tiered cycle parking may be acceptable provided it is easily used and secure.	The bike store includes double-stacked bike parking which will be easily accessible.
Planning applications shall clearly demonstrate cycle parking capacity and user accessibility	Bike parking details are clearly outlined in the landscape architects drawings.
A departure from the standards set out in Table 1 may be acceptable in limited circumstances on a case by case basis at the discretion of Dublin City Council. The applicant must fully engage with Dublin	The proposal exceeds the standards set out in the Table 1.

City Council at pre-application stage to ascertain any deviations from the above standards	
Table 2 specifies the requisite level of on-site parking to be provided for residents, staff and visitors for various types of development. These car parking standards shall be generally regarded as the maximum parking provision	The subject site is located in parking zone 2. Table 2 requires a maximum of 1 spaces per unit or 284 no. car parking spaces for the proposal (1 per unit).
A relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location	The 19 no. housing units are provided with 19 no. car parking spaces, providing 1 per unit. The 265 apartments are provided with 138 car parking spaces at a ratio of 0.52 units per hectare. This car parking provision is considered appropriate for this highly accessible location.
Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria: • Locational suitability and advantages of the site. • Proximity to High Frequency Public Transport services (10 minutes' walk). • Walking and cycling accessibility/permeability and any improvement to same. • The range of services and sources of employment available within walking distance of the development. • Availability of shared mobility. • Impact on the amenities of surrounding properties or areas including overspill parking. • Impact on traffic safety including obstruction of other road users. • Robustness of Mobility Management Plan to support the development.	The subject site is highly accessible and is located within the existing suburban area of Terenure with a range of facilities within a short distance. The proposed development is located 1 minute walk from the Fortfield Road bus stop no.2397 which is served by the 54A bus. The site is also 0.5km from Bus Stop 1159 on Templeogue Road and the associated availability of high frequency bus routes, including the increased service capacity associated with the proposed 'Tallaght to Terenure' Core Bus Corridor route.
At least 5% car parking spaces shall be designated accessible car parking spaces.	5% of the car parking spaces provided have been designed as accessible car parking spaces.
Proposals should indicate how the design aims to control surface water runoff in a sustainable fashion through the use of permeable or porous surfaces such as gravel and green areas etc. rather than excessive hard surfacing	The proposal incorporates SUDs features including green roofs and permeable paving.
In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications	All of the car spaces have access to EV charging.
New developments shall include provision for motorcycle parking in designated, signposted areas at	The proposal includes 14 no. motorcycle spaces within the scheme.

a rate of 5% of the number of car parking spaces provided. Motorcycle parking areas shall have limited gradients to enable easy manoeuvrability and parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.	
All car club spaces shall be fully equipped with EV infrastructure	The car club spaces are fully equipped with EV infrastructure.
All roads and footpaths within developments shall be constructed to Taking-in-Charge standards	All roads and footpaths will be constructed to taking-in-charge standards.
Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application	None of the site is proposed to be taken in charge.

Appendix 5 Table 1 Bicycle Parking Standards for Various Land Uses		
Land Use	Long Term	Short Stay
Residential Apartment	1 per bedroom	1 per 2 apartments
Residential Dwelling	1 per unit	1 per 5 dwellings
Café	1 per 5 staff	1 per 10 staff
Retail	1 per 5 staff	1 per 100 sq.m GFA

Appendix 5 Table 2 Maximum Car Parking Standards for Various Land Uses			
Land Use	Zone 1	Zone 2	Zone 3
Houses, Apartments/Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling
Café Restaurant and Takeaways	None	1 per 150 sq.m seating area	1 per 150 sq.m seating area

Appendix 7 Waste Storage	
Waste storage issues should be considered at the initial design and pre planning stage of all residential developments to ensure access for all (including people with disabilities), in a brightly lit, safe and well-signed area, spacious enough for easy manoeuvrability, with good ventilation and ready access if required for the control of potential vermin.	Dedicated bin stores are provided at surface level in proximity to the access road. The Bin Stores are appropriately designed and easily accessible for pick up. They are designed to have good ventilation and ready access.
Provision shall also be made for the storage and collection of waste materials in apartment schemes in accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018.	An Operational Waste and Recycling Management Plan has been prepared by AWN.
Requirements for residential developments: • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of	Please see the detail in the Operational Waste and Recycling Management Plan prepared by AWN.

non-reusable receptacles such as bags, ideally of 1,100 litre capacity, must be used • To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general waste, dry recyclables and organic food/garden waste. • Sufficient space must be provided to accommodate the collection of dry recyclables and organic kitchen waste/ garden waste. • Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.	

Appendix 9 Basement Development Guidelines	
The BIA will be specific to the site and the proposed development and should be undertaken by a person(s) with the appropriate qualifications and experience (Chartered Structural and/or Geotechnical Engineer or equivalent).	Please refer to the Basement Impact Assessment prepared by PUNCH.
Basement Impact Assessment – Submission Checklist See table below.	Please refer to the Basement Impact Assessment prepared by PUNCH.

	Item	Yes/No
1	Description of proposed development.	
2	Plan showing boundary of development including any land required temporarily during construction.	
3	Plan, maps and photographs to show the location of basement relative to surrounding structures.	
4	Plans, maps and or photographs to show topography of surrounding area with any nearby watercourses/waterbodies including consideration of the relevant maps on the SFRA (Vol 7).	
5	Plans and sections to show foundation details of adjacent structures (reference to pre-condition reports).	
6	Plans and sections to show layout and dimensions of proposed basement and all proposed foundation details.	
7	Modelling evaluation of baseline groundwater levels and flows.	
8	Modelling and evaluation of groundwater levels and flows during construction and following construction of basement.	
9	Programme of enabling works and construction and restoration.	
10	Identification of potential risks to land stability (including surrounding structures and infrastructure and groundwater flooding.	
11	Assessment of potential risks on neighbouring properties and surface groundwater.	
12	Identification of significant adverse impacts.	
13	Ground Investigation Report and Conceptual Site Model including: ▪ Desktop study ▪ Exploratory hole record ▪ Results from monitoring the local groundwater regime ▪ Confirmation of baseline conditions ▪ Factual site investigation report	
14	Ground Movement Assessment.	
15	Plans, drawings, reports to show extent of affected area.	

16	Construction Sequence Methodology (CSM) referring to site investigation and containing basement, floor and roof plan, sections, sequence of construction and temporary works.	
17	Proposals for monitoring during and post construction (groundwater movement and levels, ground movement, vibration with comparisons to baseline) – limits to be advised in BIA and monitored. Any breaches should be reported to DCC's Environment and Transportation Department.	
18	Consideration of potential impacts to protected structures, conservation areas and archaeology where relevant.	
19	Consideration of potential impacts to biodiversity and amenity.	
20	Construction Management Plan.	
21	Impact assessment and specific mitigation measures to reduce or offset significant adverse impacts with comparisons to baseline study.	
22	Provision for monitoring post construction (post-condition surveys, groundwater levels/flows etc.).	
23	Non-technical summary of full report.	

Appendix 11 Green and Blue Roof Guide	
All development types are considered appropriate for green blue roof application	The proposed development includes blue and green roofs. Please see Engineering Report prepared by PUNCH which sets out the type of roof, its coverage and the rationale behind the provision of each type.
Planning applications which include roof areas of greater than 100 sq. m. with flat and gently sloped roofs are considered appropriate for green blue roof application	
The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.	
Roof areas that are not considered for green roof due to the presence of solar panels should still be considered for blue roof.	Solar PV panels are included on the roof. The remainder of the roofs are blue and green roofs.
The design of the green blue roof should maximise biodiversity and/ or amenity benefits.	The green roofs will support planting which will increase biodiversity on the site.
Green blue roof designs should be designed to ensure that any amenity use (e.g. use as communal open space) can be facilitated without effecting storage capacity or drainage function of the green blue roof	

Type	**Minimum Coverage (% of total roof area being developed)**
Extensive	70%
Intensive	50%

Appendix 12 SUDs	
SuDS designs will explore opportunities for: sustainable reuse of rainfall (see policy SI6); recharge of aquifers; interception and evapotranspiration of surface water; and direct discharge to open channel watercourses, thus reducing the pressure on the piped drainage network.	The proposal incorporates SuDS features including green roofs and permeable paving.
SuDS structures should be integrated into the fabric of a development using the available landscape	The proposed SuDs features are integrated into the layout and landscaping.

spaces as well as the construction profile of buildings. Consideration of existing site topography, landscape resources and how the site is used is vital in determining the most appropriate SuDS measures in a scheme	
Areas that store surface water during regular rainfall events, except ponds or wetlands, shall not normally be included in the calculation of open space provision.	SuDS features are not included as part of the open space provision.
However, where SuDS proposals enhance biodiversity and amenity value and would be readily available for use in most weather conditions, a portion of the SuDS area could be incorporated as part of the communal or public open space provision	
The proportion of SuDS which would be allowable as part the public open space allocation would be decided on a case-by-case basis by the planning authority. The following points will be considered in determining the areal extent of SuDS which serve as multifunctional space and/ or contribute to the public open space allocation: • That sufficient open space remains available (except in response to extreme rainfall events) to allow for passive and active recreation including organised sport, informal play or active recreational use. • How often a particular feature would hold surface water. • The duration that feature would hold surface water. • Period between rainfall ending and the area being available for use. • Whether the SuDS features could be deemed to be providing an open space benefit even when holding surface water (for example, ponds and wetlands).	The proposal includes high quality open spaces that are not negatively impacted by the inclusion of attenuation tanks or SuDs features.
The following methods of utilising or releasing rainfall run-off from development are set out in order of preference: i. Use surface water run-off as a resource. ii. Provide interception of rainfall through the use of nature based SuDS approaches. iii. Where appropriate, infiltrate run-off into the ground. iv. Discharge to an open surface water drainage system. v. Discharge to a piped surface water drainage system. vi. Discharge to a combined sewer. Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.	The proposal includes green roofs and permeable paving as interception storage. Run-off from the site will discharge into receiving waters through traditional pipe networks. Rainfall run-off from the proposed site development will go through at least a two-stage treatment train prior to discharge into the public system.

Surface run-off from new development will be restricted to 2 l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep61) where surface water leaving the site: • poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse); • has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event).	The proposed development will limit discharge rate to the appropriate rate as set out in the Engineering Report.
The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.	PUNCH's Engineering documents demonstrate their acceptability and suitability for this site in line with SUDS.
Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.	
Designs should seek to generate biodiversity benefits using SuDS.	

Appendix 13 Surface Water Management	
Dublin City Council (DCC) will require a softer engineered or nature based approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing surface water on development lands	The proposal incorporates SuDS features including green roofs and permeable paving.
Development proposals must be accompanied by a Surface Water Management Plan (SWMP) which sets out the proposed strategy for managing surface water.	The Surface Water Management Plan is included within the Engineering Report and drawings prepared by PUNCH Consulting Engineers which demonstrate how the proposed surface water management strategy is in line with the development plan and DCC guidelines.
The objective of producing a SWMP is for the developer/ project proposer to consider all the opportunities and constraints in developing a design solution that will manage surface water in a way that utilises and mimics natural processes, whilst protecting and enhancing the built and natural environment.	

The SWMP prepared for submission to the planning authority as part of a planning application shall include the following:
• Site location map with proposed planning boundary indicated in red
• Overall surface water drainage layout indicating:
  • Existing public surface water infrastructure
  • Proposed connection points to existing public sewers
  • Spine sewers (if any)
	The drawings and reports prepared by PUNCH Consulting Engineers provide all this detail required for the Surface Water Management Plan.

• Detail of any surface water sewer extension, diversions, surface water sewer upgrades etc. to be clearly indicated • Report detailing existing site conditions including: • Topography • Ground conditions • Land drain features • Overland flow paths • Floodplains • Utilities • Detail of proposed surface water management strategy shall include: • Longitudinal section details of proposed surface water pipe runs if required indicating route, levels, pipe size, gradient etc. A well designed SuDS scheme will reduce or even eliminate the need for significant piped drainage • Identify proposed location to discharge to stream or public drainage system • Identification of appropriate SuDS features to meet the key criteria of the GDSDS and reference in Section 16.3 of the Greater Dublin Regional Code of Practice for Drainage Works - source control and interception storage provided and volumes defined – no run-off from site for events up to 5mm. See also the Council's Sustainable Drainage Design and Evaluation Guide (2021) and Appendix 12 • Provide a clear explanation of the SuDS proposals proposed for each hardstanding area including defined control structures and sizes of same • Discharge rate applied • Attenuation storage provided and volumes defined – storage for 1% and 3.3% annual probability with factor in accordance with the SFRA for climate change shall be applied. A figure of 20% will be applicable in most cases • Exceedance and overland flow routes • Phased development – where development under a planning application/permission is phased, coordination of the overall surface water management strategy shall be implemented at the first phase in order to ensure the overall integrated design is implemented. This would allow different parts of a site to be developed at different times, while ensuring that the final developed site shall meet the overall design criteria as set out in this Appendix • Identify green space and public space locations including any that are designed to be	

multifunctional – integrating SuDS (see also Section 15.6 – Green Infrastructure and Landscaping) • Details of any proposed wayleaves or land transfers in relation to surface water drainage. • An undertaking that SuDS will be completed to taking in charge standards (in accordance with policy SI26)	

Appendix 16 Sunlight and Daylight	
Performance of Proposed Development • Annual Probable Sunlight Hours on all relevant windows • Winter Sunlight Hours on all relevant windows • Sunlight on Ground in all amenity spaces • Average Daylight Factor in all habitable rooms • No Sky Line in all habitable rooms • Target Illuminance in all habitable rooms	OCSC have prepared a Daylight Sunlight Assessment which assesses the proposed development under BRE Guide 3rd Edition. The analysis confirms that across the entire development excellent levels of internal daylight are achieved. The results show against the worst-case sample, a 100% compliance rate has been achieved. A secondary daylight analysis was completed on the same worst-case scenario spaces using the targets set out in Appendix 16 of the DCDP, and a 100% compliance rate was achieved against this standard. The sunlight assessment has shown that 76% of windows to bedrooms and living areas are receiving the minimum recommended levels of sunlight, as tested against the BRE Guide 3rd Edition. The BRE Guide 3rd Edition states that compliance is to be calculated on a dwelling by dwellings basis. Using this methodology the compliance rate is 97%. In relation to amenity space sunlight, all open amenity spaces in the development show compliance with BRE Guide 3rd Edition recommendations, with all amenity spaces receiving more than 2 hours of sunlight on between 76% and 100% of their areas on March 21st .
Impact on Surrounding Properties • Vertical Sky Component on all relevant surrounding windows • Annual Probable Sunlight Hours on all relevant surrounding windows • Winter Sunlight Hours on all surrounding windows • Sunlight on Ground in all surrounding amenity spaces	
When assessing the impact of a proposed development, it is expected that all surrounding properties are assessed. It is not acceptable to assess only the surrounding residential properties. Residential properties should be clearly marked out and results for these presented separately	
When assessing the impact of a proposed development on the existing surrounding properties, it is expected that the rule within clause 2.2.4 of BR 209 is applied. This rule outlines that "Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window". Thus, all surrounding buildings that sit within three times the height of the proposed development shall be included within the assessment. The assessment can then use methods typically applied in BR 209 to determine the correct approach to investigating loss of light.	
When analysing the results found to investigate the impact of a proposed development on the surrounding existing buildings, it is expected that the nomenclature and associated descriptions from	The Daylight Sunlight Assessment uses all terminology in line with the BRE Guide 3rd Edition.

<table>
<tr><td>within Appendix I of BR 209 are used. The wordings of negligible, minor adverse, moderate adverse and major adverse have defined meanings. These meanings have associated descriptors, and these shall be applied during the analytics section of reports. Appendix I in BR 209 provides these descriptions in full.</td><td></td></tr>
<tr><td>The use of average daylight factor in assessing the impact of a new development on surrounding existing developments is not permitted.</td><td></td></tr>
<tr><td>Where alternate target values are being set, this shall be completed in line with Appendix F of BR 209</td><td>The daylight report clearly outlines what target values have been set.</td></tr>
<tr><td>When analysing the performance of a proposed development, it is expected that all rooms with an expectation for daylight are assessed. Assessing only a sample of rooms is not permitted.</td><td>All rooms within the proposed development have been assessed.</td></tr>
<tr><td>When determining input factors for simulations, the criteria below shall be applied, applicants shall clearly state their assumptions.</td><td>The assumptions are clearly stated in OCSC’s report.</td></tr>
<tr><td>For residential developments, the internal daylight levels shall be benchmarked against the relevant targets in both BS 8206-2 and BS EN 17037. These are given below for clarity.

Table 1: Internal Daylight Levels
<table><tr><th>Room Type</th><th>BS 8206
Average Daylight Factor</th><th>BS EN 17037
Target Illuminance</th></tr><tr><td>Bedroom</td><td>1.0 %</td><td>100 lux</td></tr><tr><td>Living Room</td><td>1.5 %</td><td>150 lux</td></tr><tr><td>Kitchen</td><td>2.0 %</td><td>200 lux</td></tr><tr><td>Kitchen, Living & Dining</td><td>2.0 %</td><td>200 lux</td></tr></table></td><td>The assessment has been carried out in line with the BRE Guide 3rd Edition as adopted.</td></tr>
<tr><td>When assessing target illuminance, it shall be clearly stated which of the two methodologies within BS EN 17037 has been applied. Where the climatic data approach is used, the minimum time step shall be hourly and the weather file chosen shall be stated. Assessments shall not combine both methods (e.g., where the median external sky method is used to assess north facing rooms, this shall also be used to assess all other rooms).</td><td>The OCSC report clearly sets out the methodology used and why it is appropriate.</td></tr>
<tr><td>For combined kitchen, living and dining rooms, the full extent of the area within these spaces shall be included in assessments of internal daylight. Where galley type kitchens are provided, the application shall clearly set out how they were unavoidable in the design. It is expected that developments will not consist entirely of units that rely on galley type kitchens</td><td>This is noted and again, the OCSC report clearly sets out the approach used in this development.</td></tr>
</table>

As demonstrated by the above statements of compliance, this proposed development is fully in accordance with the National, Regional and Local Planning Policies.

8. Conclusion

The proposed development represents an attractive residential development in an established residential, built up, highly accessible and well serviced location within Dublin City. The development will provide for an effective and efficient use of these serviced lands which have remained vacant and unused for some time.

It is noted that the previously reasons for refusal applied to the previous LRD development on this site have now been addressed in full in the current scheme and are summarised below:

- The proposal provides a robust justification for how the scheme is fully in accordance with the development plan requirements and in particular those requirements of the Z15 lands. As demonstrated through the various reports submitted with this application, the proposed development will in no way compromise or restrict the current operations of the existing school. Nor will it prevent the future expansion of the institutional uses or facilities on the remainder of the Z15 lands.
- The density has been reduced from 146 uph to 107 uph by reducing the quantum of residential development and height. The reduced scale and density of residential development is fully in compliance with the Development City Development Plan.
- The proposal has also fully addressed previous flood risk concerns and provides additional detention area, designed in accordance with DCC requirements.
- The proposal now includes one single vehicular access to the development from Fortfield Road and has removed previously proposed secondary access to address any traffic safety concerns.

We also note the following additional proposals in the current scheme:

- Cultural and Arts space, the equivalent of 5% of the floor area, is provided.
- A new creche, providing accommodation for 17 children, is also proposed within the development.
- Car parking ratios have also been increased by providing a ratio of 1:1 car spaces for houses and 1: 0.52 for apartments, an increase from 1:0.33 for apartments in the previous LRD. Furthermore, the reports submitted as part of the application demonstrate the site's accessible location due to its proximity to a high frequency public transport corridor and suitability for the parking ratio proposed.
- All items within the LRD Opinion have been addressed in full.

The planning policy review within this report demonstrates that the proposed development accords in principle with national and regional planning objectives as directed under the NPF.

The proposed development addresses all the previous reasons for refusal and is fully compliant with the policies and provisions of the area including the land use zoning, density, design standards for residential schemes, streets, parking and open spaces. The proposed development will also bring significant benefits to the area, in particular the provision of new public open space, a better mix of housing types and unit sizes to the area and a new community/ cultural/ arts space.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

Thank you for taking the time to consider the proposal and we look forward to a positive planning decision in due course.