

STATEMENT OF CONSISTENCY

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT OF 2.54 HECTARES AT KNOCKRABO, MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14, INCLUDING WORKS TO CEDAR MOUNT (A PROTECTED STRUCTURE) AND KNOCKRABO GATE LODGE (WEST) (A PROTECTED STRUCTURE).



PREPARED FOR:

KNOCKRABO INVESTMENTS DAC,
32 Molesworth Street
Dublin 2.

PREPARED BY:

TOM PHILLIPS + ASSOCIATES
80 Harcourt Street,
Dublin 2,
D02 F449.

1st November 2024

TOWN PLANNING CONSULTANTS

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1.0 INTRODUCTION

1.1 Introduction

This *Statement of Consistency* demonstrates that the proposed residential and ancillary development at Knockrabo, Mount Anville Road, Goatstown, Dublin 14 is consistent with relevant policies relating to the site at national, regional and local levels.

The proposed Large-scale Residential Development (LRD) has been developed by Knockrabo Investments DAC and relates to a site of 2.54 hectares, at Knockrabo, Mount Anville Road, Dublin 14. The application will form Phase 2 of the overall development at Knockrabo. Phase 1 is located to the immediate east and served by Knockrabo Way, an access route that extends from Mount Anville Road to the alignment of the reservation corridor for the (previously proposed) Dublin Eastern By-Pass, to the north of the overall lands.

The application site includes Cedar Mount (a Protected Structure, RPS Ref. 783) and associated former coach house building, as well as Knockrabo Gate Lodge (West) (a Protected Structure RPS Ref. 796), including Entrance Gates and Piers.

Phase 1 comprises a total of 119 No. residential units, including the refurbished Knockrabo Gate Lodge (East) and 4 No. blocks of apartments, (permitted under DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799) (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A).

In summary, the proposed development will provide 158 No. residential units comprising 12 No. houses and 146 No. apartment and duplex units with ancillary community and leisure and childcare facilities to serve both phases at this residential development.

The development includes 3 No. apartment blocks ranging in height from 3-4 storey including part basement to 8 storey including part basement level (Blocks E, F and G). The scheme also includes 2 No. blocks (3 and 4 storeys in height), comprising 32 No. apartments/duplex units.

Overall, the scheme has been designed to integrate to the landscape of the subject site, taking account of the established sylvan character, site contours and permitted and constructed development within Phase 1 to the east of the subject site.

The application also includes works relating to the existing structures on site which were previously permitted under Reg. Ref. D17A/1124 (now expired).

These works include the refurbishment of Cedar Mount, providing 2 No. apartments, a childcare facility (c.400 sqm GIA), and community /leisure uses (c.223 sqm GIA), and the refurbishment and extension of the associated Coach House building (for residential use).

The works also included the refurbishment and extension of Knockrabo Gate Lodge (West) (a Protected Structure, RPS Ref. 796), for residential use, and the provision of an additional 'Gate House' dwelling, to the west of proposed repositioned entrance to Cedar Mount from Mount Anville Road.

It is proposed that access to the site will be from Knockrabo Way to the east of the overall site. A local access road will provide access to Block E, with a secondary access road proposed to serve Blocks G and F. Separate accesses will be provided to Knockrabo Gate Lodge (West) and to Cedar Mount from Mount Anville Road, providing access to a shared surface environment

in the attendant grounds of these buildings.

Based on the total LRD site area of c.2.54 hectares, the proposed development will provide a gross residential density of 62 units per hectare and a net density of 103.3 units per hectare. As part of the overall lands at Knockrabo of c.5.4 hectares the site has a gross density of 51.4 units/hectare and a net density of 65 units/hectare. This net figure takes account of lands associated with the proposed pedestrian and cycle connection to the DEBP and around Cedar Mount House and its associated grounds, reflecting the entirety of Knockrabo - Phases 1 and 1A as permitted and constructed, and the proposed Knockrabo Phase 2.

From a land use perspective, the subject site is zoned Objective A – ‘*To protect and/or improve residential amenity*’. The proposed residential development together with the proposed non-residential lands, which include a childcare facility and community/leisure uses, accord in full with the land use zoning objective for the site.

1.2 Outline of This Report

This *Statement of Consistency* provides a description of the proposed development followed by a list of the various statutory and strategic policy documents considered. The Statement demonstrates full consistency with, *inter alia*, the pertinent Development Plan and the relevant guidelines under S. 28 of the Acts.

The Statement demonstrates full consistency with the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* (the ‘Development Plan’), and the relevant Section 28 National Guidelines.

This standalone planning policy consistency statement, prepared by TPA Planning Consultants¹ demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by OMP Architects, Dermot Foley Landscape Architects and Waterman Moylan Consulting Engineers as well as specialist input.

For further details of consistency with the quantitative standards for residential units as set in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) (the ‘Apartment Guidelines’) and the 2022-2028 Development Plan please refer to the *Housing Quality Assessment* document prepared by OMP Architects.

¹ 80 Harcourt Street, Dublin 2, D02 F449.

1.3 Policy Documents Considered

The following policy documents have informed this *Statement of Consistency*:

1. National Planning Framework (Ireland 2040- Our Plan)
2. Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031 (2019);
3. Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009);
4. Urban Design Manual: A Best Practice Guide (2009);
5. Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023);
6. Quality Housing for Sustainable Communities (2007);
7. Childcare Facilities – Guidelines for Planning Authorities (2001);
8. Part V of the Planning and Development Act 2000: Guidelines (2017);
9. Design Manual for Urban Roads and Streets (DMURS) (2019);
10. The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)
11. Urban Development and Building Heights, Guidelines for Planning Authorities (2018);
12. Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009);
13. Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
14. Delivering Homes, Sustaining Communities (2024) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
15. Sustainable Residential development and Compact Settlement Guidelines for planning Authorities, 2024
16. Dún Laoghaire-Rathdown County Development Plan 2022-2028;
17. Transport Strategy for the Greater Dublin Area 2016-2035;
18. Climate Action Plan 2024.

2.0 SITE CONTEXT

2.1 Site Location

The subject site comprises a parcel of lands at Knockrabo, Mount Anville Road, Dublin 14, as illustrated in Figure 2.1.

The site is bounded as follows:

- to the south by Mount Anville Road;
- to the south-west by the rear boundaries of residential properties ('Mount Anville Lodge', 'Thendara' (a Protected Structure RPS Ref. 812), 'The Garth' (a Protected Structure RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure RPS Ref. 829).
- To the west by existing allotments;
- to the north by the Reservation Corridor for the Dublin Eastern By-Pass (DEBP); and
- to the east by Phase 1 of the Knockrabo development (permitted under DLRCC Reg. Ref.: D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/082; and DLRCC Reg. Ref. D16A/0960 (Phase 1A)).

The Planning Application comprises Phase 2 of permitted residential development, occupying the western side of the broader Knockrabo site.

The site comprises an area of c.2.54 hectares and is predominantly greenfield, and consists of grounds sloping northwards away from Mount Anville Road, with levels ranging from +76m OD at Mount Anville Road to +59m OD at the northern end of the site.

The site includes a series of structures, namely Cedar Mount (a Protected Structure, RPS Ref. 783) and its former coach house building and Knockrabo Gate Lodge (West) including gates and piers (a Protected Structure (RPS Ref. 796)).

It is proposed that access to the site will be from Knockrabo Way, the established access route from Mount Anville Road to the reservation corridor of the (previously proposed) Dublin Eastern Bypass to the north of the overall Knockrabo lands. A local access road will provide access to Block E, with a secondary access road proposed to serve Blocks G and F. Access will be provided to Knockrabo Gate Lodge (West) and to Cedar Mount, providing access to a shared surface environment in this part of the site.

The site is located in the suburban area of Goatstown, Dublin 14 and as noted above, to the northern side of Mount Anville Road. The junction with Goatstown crossroads is located within 400m to the west of the site and the junction with Roebuck is within c.700 metres to the northeast.

The site is located within 1.4km of the N11 Strategic Road Corridor, located to the northeast of the site. The site is also within 2.8km of the M50, providing convenient access to the national road motorway network.

With respect to public transport the site is within 1.5km of Luas green line stops at both Kilmacud and Dundrum. A number of bus stops and services are identified in the *Public Transport Capacity Analysis* prepared by Waterman Moylan, as follows:

Mount Anville Road

Route S6 is an orbital route operating at a frequency of 15 minutes in both directions between Old Bawn Centre in Tallaght and Blackrock DART Station via Nutgrove Retail Park and the UCD Campus at Belfield. Route S6 operates along Mount Anville Road, to the front entrance of the subject site, with both directions located within 2 -3-minute walk from the subject site.

Goatstown Road

Route 11 is City Bound route serving The Goat public house and surrounding area and operating at a frequency of 15 - 20 minutes in both directions between Sandyford Business Park and Wadelai Park via Ranelagh and O'Connell Street. Stops for both directions are located within an 7-minute walk from the subject site.

Eden Park Road

Route L25 is a local route operating along Eden Park Road to the south of the subject site at a frequency of 20 minutes in both directions between Dundrum Luas and Dun Laoghaire DART Park via Stillorgan Village. Stops for Route L25 in both directions are located within a 17 - 18-minute walk from the subject site.



Figure 1.1: Site Location Map – Indicative site boundary in red (Source: Google Maps, annotated by TPA, 2024)

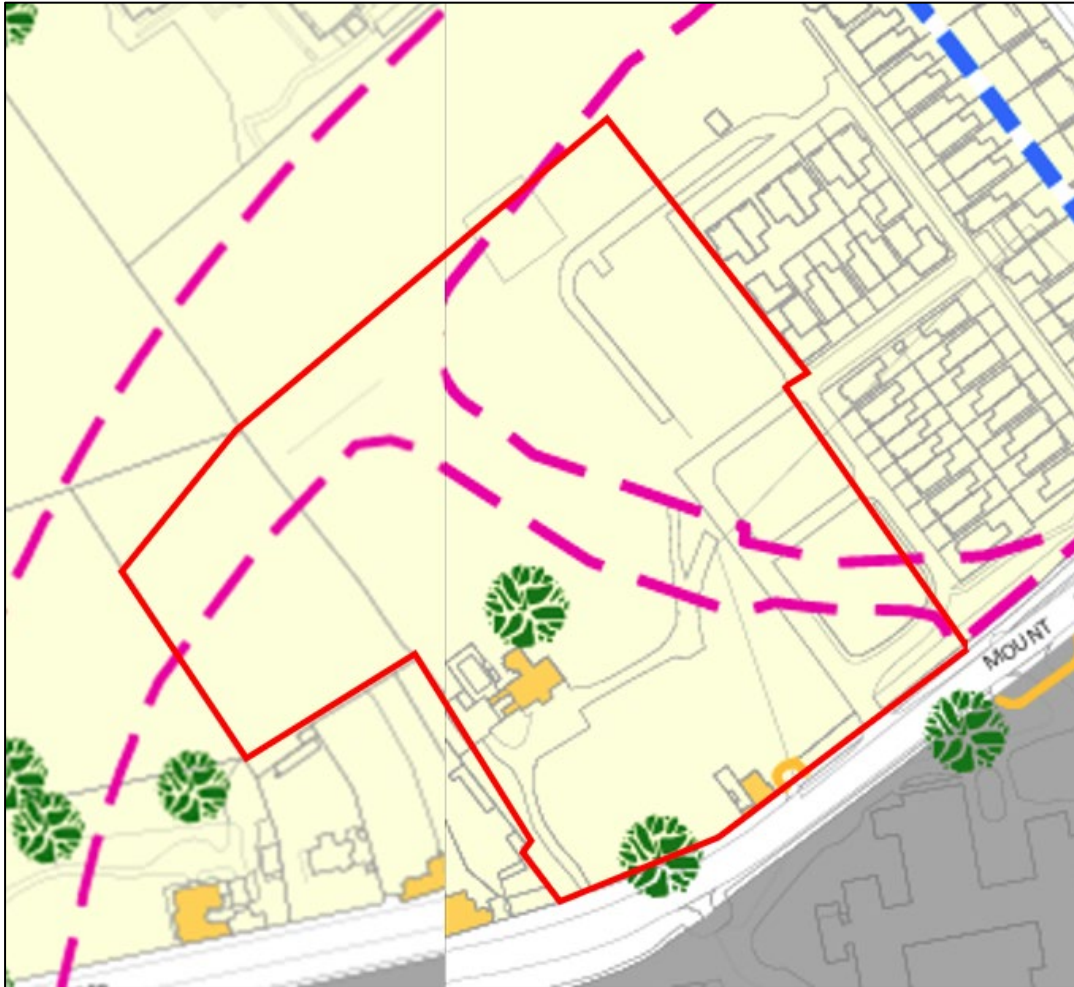


Figure 1.2: Site Location – Indicative site boundary in red (Source: Dun Laoghaire Rathdown County Council Development Plan Zoning Maps, annotated by TPA, 2024)

2.2 Proposed Development Description

“Knockrabo Investments DAC intend to apply for permission for a Large-scale Residential Development (for a period of 7 years) with a total application site area of c. 2.54 hectares, at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The proposed development relates to Phase 2 of the development on the ‘Knockrabo’ lands. Phase 1 of ‘Knockrabo’ was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 119 No. units.

The site is bounded to the south-east by Mount Anville Road; to the south by ‘Mount Anville Lodge’ and by the rear boundaries of ‘Thendara’ (a Protected Structure – RPS Ref. 812), ‘The Garth’ (a Protected Structure – RPS Ref. 819), ‘Chimes’, ‘Hollywood House’ (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development ‘Knockrabo’ (Phase 1, permitted under DLRCC Reg. Ref. D13A/0689 / An Bord Pleanála (ABP) Ref. PL.06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1); and DLRCC Reg. Ref. D16A/0960 (Phase 1A)). The site includes ‘Cedar Mount’ (a Protected Structure- RPS Ref. 783), ‘Knockrabo Gate Lodge (West)’ (a Protected Structure RPS Ref. 796), including Entrance Gates and Piers.

The development with total of c.17,312.2 sq.m. gross internal area (GIA) will consist of the construction of 158 No. residential units (12 No. houses and 146 No. apartments (35 No. 1 beds, 81 No. 2 beds, 3 No. 3 beds and 27 No. 3 bed duplex units), a childcare facility (c.400 sq.m. GIA) and Community / Leisure Uses (c. 223 sq.m. GIA), as follows:

- *Block E (c.1,077 sq.m. GIA): a 5-storey including semi-basement podium level apartment block, comprising 8 No. apartments (1 No. 1 bed and 7 No. 2 beds);*
- *Block F: (c.8,390.8 sq.m. GIA): a part 2 to part 8 storeys including semi basement podium apartment block, comprising 84 No. units (31 No. 1 beds, 50 No. 2 beds and 3 No. 3 bed duplex units);*
- *Block G: (c.2,022.1 sqm GIA): a part 4 to part 5-storey apartment block, comprising 20 No. units (3 No. 1 bed units, 14 No. 2 bed units and 3 No. 3 bed units); (with sedum roof/PV panels at roof level of Blocks E, F and G; a communal Roof Terrace of c. 198 sqm on Block F; and balconies/wintergardens on all elevations of Blocks E, F and G);*
- *Duplex Blocks: (c. 3,292.6 sqm GIA): 1 No. 3 storey and 1 No. 4 storey block, comprising a total of 32 No. units (8 No. 2 bed units and 24 No. 3 bed duplex units);*
- *10 No. (new build) houses: 6 No. 4 bed 2.5-3 storey terraced/semi-detached units (ranging in size from c.162.1 sqm GIA to c.174.2 sq.m. GIA); 1 No. 3 bed 2 storey detached unit (126.2 sq.m. GIA); 1 No. 3 bed 2 storey mid terrace unit (c.129.2 sq.m. GIA); 1 No. 3 bed 2 storey end of terrace unit (c.129.2 sq.m. GIA); and 1 No. 1 - 2 storey ‘Gate House’ (c. 122.6 sq.m. GIA) to the west of proposed repositioned entrance to Cedar Mount from Mount Anville Road;*
- *The use of existing ‘Coach House’ as a residential dwelling and for internal / external repair / refurbishment works at ground and first floor levels, including the removal of 3 No. roof lights, 1 No. metal clad dormer roof window and external water tank; the construction of 2 No. single storey flat roof extensions (c.35.5 sq.m. GIA), revisions to the external facade including the addition of 1 No. new window ope on the south facade and rendered finish to all original facades, solar panels at roof level; removal / re-use of stone to form new garden wall; to provide 1 No. 2 bed house (c. 99.5 sq.m. GIA) with refurbished stone shed (c. 13.9 sq.m. for storage GIA).*

- *The use of Knockrabo Gate Lodge (West) (a Protected Structure) as a residential dwelling; and for repair / refurbishment works including demolition of existing section of extension on top of stone boundary wall; removal of 1 No. roof light and 1 No. internal partition wall; construction of replacement extension (c.77.5 sq.m. GIA) to provide 1 No. 3-bed unit (c. 128 sq.m. GIA) with solar panels at roof level, bin storage, landscaping, all repair works to the existing Gate and Piers, and all associated internal and external elevational changes;*
- *The proposed development comprises works to Cedar Mount (a Protected Structure) to provide: 1 No. Childcare Facility at Lower Ground Floor level (c.400 sq.m. GIA) with associated external play and bin storage areas; Community / Leisure Uses at Ground Floor Level (c. 223 sq.m. GIA), comprising Gym / Studio (c.35.6 sq.m. GIA), Library / Office (c. 35.9 sq.m. GIA), Meeting room (c.28.4 sq.m. GIA) and Conservatory room (c. 21.6 sq.m. GIA); and 2 No. 2 bed apartments at 1st floor level, (c.77.6 sq.m. GIA and c.88.2 sq.m. GFA). The works to Cedar Mount to consist of:*
 - *At lower ground floor/ basement level, the removal of internal walls and sections of external and internal walls and access doors; insertion of openings through external and internal walls; repair of existing “loggia” (covered external corridor) on northern, north-western and north-eastern facades, with revised elevations comprising glazed panels / glazed entrance doors located within loggia opes; the additional area (c. 58 sq.m. GIA) to form part of proposed Childcare Facility;*
 - *At ground floor level removal of wooden staircase to 1st floor level and replacement with open-tread staircase, and construction of conservatory room (c. 21.6 sqm GIA) with flat roof on south - western side of Cedar Mount with sedum roof; removal of 1 No. WC;*
 - *At 1st floor level removal of sections of internal walls; insertion of doors through internal walls;*
 - *Re-instatement of 1 no. new chimney stack on the western end of the existing roof; replacement of rubble masonry finish with lime and sand plaster finish on all elevations relating to sections of original façade; removal of security bars from existing windows in front porch; replacement / reconfiguration of rainwater downpipes, hopper heads and associated roof outlets; Re-modelling of extension on northern side including replacement of timber / pressed metal cladding with brick / zinc cladding and glazing at ground and 1st floor levels, removal / replacement of external doors and windows; replacement of flat roof deck, parapet, eaves and roof-light with flat roof comprising brick / zinc clad parapet and removal of internal link at 1st floor level; repair works to external walls at ground floor level; Construction of rendered blockwork wall and steel handrail to terrace and associated repair works to section of existing parapet wall on eastern side of Cedar Mount; all hard and soft landscaping; revisions to garden wall and pillars on western side of Cedar Mount; and all associated internal and elevational changes; and*
 - *The repositioning of existing access (including gates and piers) to Cedar Mount (a Protected Structure) on Mount Anville Road to the northeast with associated works to boundary wall to Mount Anville Road.*

The development will also provide 130 No. car parking spaces consisting of 117 No. residential spaces (comprising 54 No. at podium level, 63 No. on-street and on curtilage spaces, 6 No. visitor spaces and 2 No. on-street car sharing spaces); and 5 No. non-residential spaces; provision of 366 No. bicycle parking spaces (consisting of: 288 No. residential spaces, 70 No. (residential) visitor spaces, 6 No. (non-residential) spaces and 2 No. visitor (non-residential) spaces); and 9 No. motorcycle parking spaces.



All other ancillary site development works to facilitate construction, site services, piped infrastructure, 1 No. sub-station, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground. In addition to the repositioned access to Cedar Mount (a Protected Structure) as referenced above, the development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.

The planning application may be inspected online at the following website: www.knockraboIrd.ie. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dún Laoghaire-Rathdown County Council, Marine Road, Dún Laoghaire, Co. Dublin, during its public opening hours of Monday to Friday from 10:00am to 4:00pm. A submission or observation in relation to the application may be made in writing to the planning authority on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by the authority of the application, and such submissions or observations will be considered by the planning authority in making a decision on the application. The planning authority may grant permission subject to or without conditions, or may refuse to grant permission."

3.0 NATIONAL AND REGIONAL POLICY COMPLIANCE

3.1 Project Ireland 2040: National Planning Framework (2018)

The *National Planning Framework* (NPF), published in February 2018, sets out a strategic development framework for the Country to 2040. The *National Planning Framework* is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040. The public consultation period for the first revision to the National Planning Framework has recently closed (12th September), and it is noted that the proposal is consistent with the draft revision of the NPF.

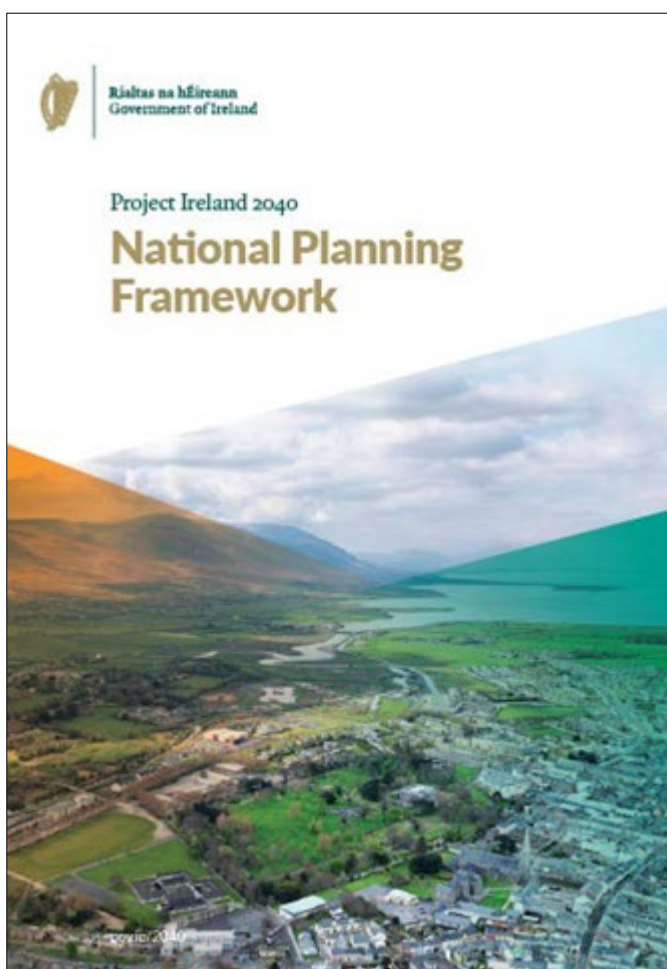


Figure 3.1: Cover of *National Planning Framework* (Ireland 2040- Our Plan).

The Framework focuses on:

- Building more accessible urban centres of scale.
- Growing regions, their cities, towns and villages and rural fabric.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

Under the heading of Compact Growth, the NPF is

*“Targeting a greater proportion (40%) of future housing development to happen **within and close to existing built-up areas**. Making **better use of under-utilised land**, including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport”.*

[Our emphasis.]

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The NPF estimates that Dublin City and suburbs will grow by c. 264,000 people in the period to 2040. Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village.

The relevant National Policy Objectives (NPOs) which seek to implement policies surrounding housing delivery and compact growth are set out below (note: this is not an exhaustive list):

- **National Policy Objective 2a** – *A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.*
- **National Policy Objective 3b** – *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*
- **National Policy Objective 5** - *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*
- **National Policy Objective 6** - *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*
- **National Policy Objective 7** - *Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- **Dublin**; the four Cities of Cork, Limerick, Galway and Waterford; Strengthening Ireland's overall urban structure, ... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs ... In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.*

- **National Policy Objective 8** – *To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.*
- **National Policy Objective 10** - *There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth.*
- **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 28** - *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*
- **National Policy Objective 35** – *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

The proposed development inherently complies with the overarching themes of the NPF by proposing a compact well-designed sustainable form of residential development on an underutilised greenfield site located in close proximity to a range of social and commercial facilities, within convenient access to a range of public transport services. The development accords with the NPF’s aims to consolidate Dublin through the development of underutilised brownfield sites.

The scale and locational characteristics of the subject site therefore provides an opportunity for a sustainable, high quality residential development and the delivery of a significant contribution to meeting housing need.

3.2 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031

The *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031* (RSES) is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Eastern & Midland Region.

The RSES includes a strategic plan for Dublin, the Metropolitan Area Strategic Plan (MASP). To achieve the Vision. The MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area, including Compact Sustainable Growth, which aims to:

“Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within

or contiguous to the existing built up area in Dublin and at least 30% in other settlements.”

[Our emphasis.]

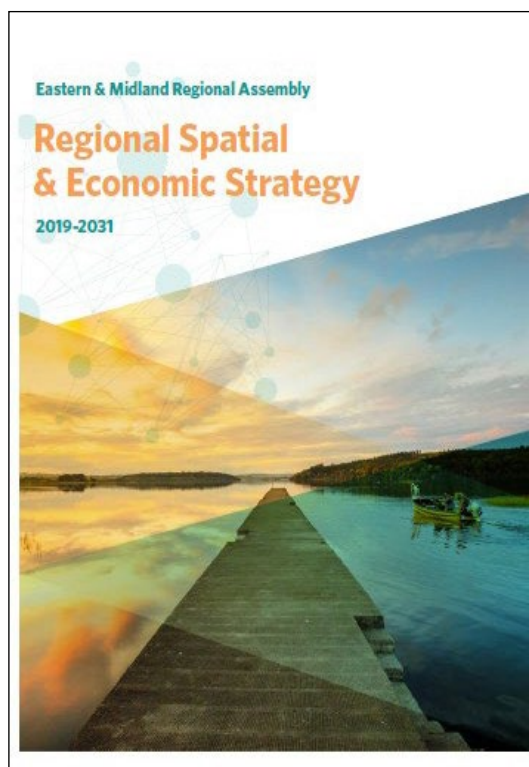


Figure 3.2: Cover of Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031.

The RSES includes Policy RPO 5.5 which focuses on housing delivery. It states:

*“RPO 5.5: Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a **primary focus on the consolidation of Dublin and suburbs**, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the draft RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

[Our emphasis.]

The proposed development is designed to utilise a vacant site in an urban context which is located in close proximity to a variety of amenities and services. The proposed residential development, which provides for a density of c. 103.3 units per hectare on the subject site (now resulting in a net density of 65 units per hectare over the entire Knockrabo scheme), is located within a 2-3 minute walk from the No. S6 Bus Routes and complies with the following policy;

“RPO 8.3: That future development is planning and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility”.

In our opinion, the subject development is fully in accordance with the objectives of the RSES realising the potential of infill lands in the consolidation of Dublin and its suburbs.

3.3 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)

The *Urban Development and Building Heights: Guidelines for Planning Authorities* were published on foot of the *National Planning Framework*. The aim of the *Guidelines* is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built-up areas.

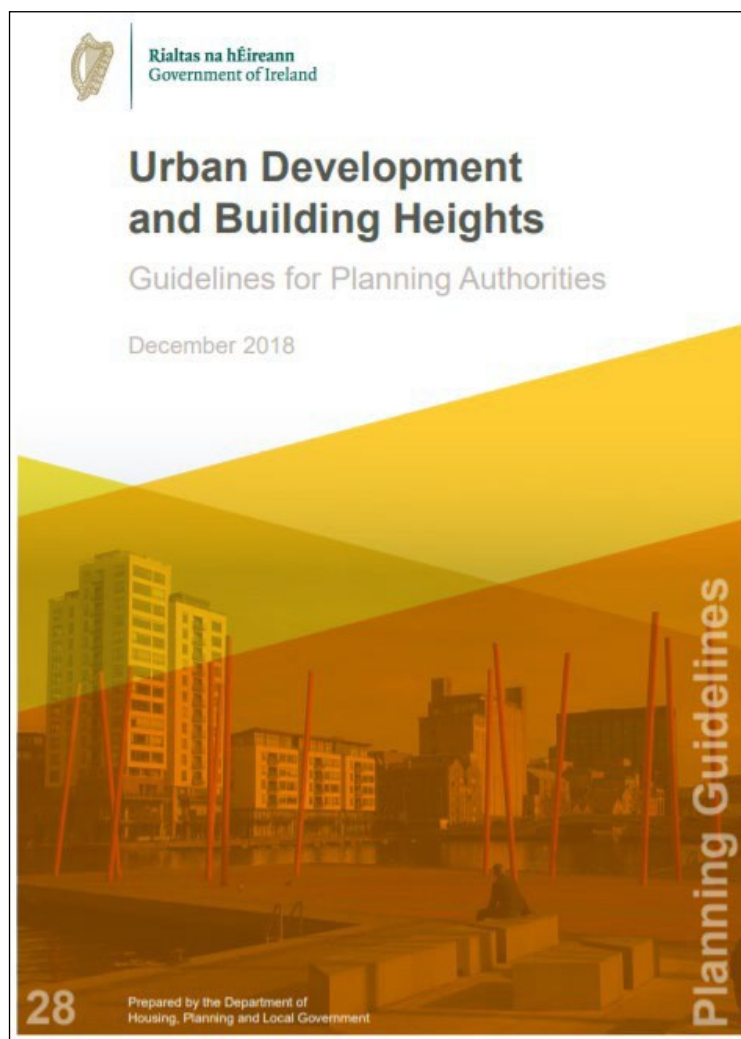


Figure 3.3: Cover of *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*.

Section 3.0 of the Height Guidelines contains **Policy SPPR 3** which states:

“It is a specific planning policy requirement that where;

- (A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines.*

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

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

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

The criteria referred to by Policy SPPR 3 is contained in Table 2.1. It sets out a number of criteria which, in line with SPPR 3, should be satisfied in terms of proposals for greater height.

The criteria are set out in the table below:

Development Management Criteria – Building Height		
Scale	Criteria	Response
City / Town	Access to Public Transport;	The subject lands are approximately 1.25km (30-minute walk) from University College Dublin, and approximately 1.9 km (25-minute walk) from Dundrum Town Centre, which are large employers in the area. The site is c. 1.5km from the green line Luas stops at Dundrum and Balally. Bus Route No. S6 directly serve the subject site and are located within a 2-3-minute walk. The site is also served by the No. 11 bus route, with the most proximate bus stops located 7 minutes from the subject site, providing services in both directions, to Dublin City Centre and Sandyford Business Park. The No. S6 is a high frequency route with buses every 15 minutes at peak hours while the No. 11 has a peak frequency of every 20 minutes. The No. 11 route connects the site with Dublin City (6.5km/35 minutes bus journey) and Sandyford Business District (4.2km/19 minute bus journey) which is also a large employer in the County. Additionally, the development is 1.5km (26-32 mins walk) from a Quality Bus Corridor (QBC) with services to the city centre running every 6 minutes and similarly close to the Dundrum LUAS stop with services running every 7 minutes to the city centre.
	Appropriate Visual Integration;	A set of photomontages as prepared by Model Works in respect of the proposal, which demonstrate the successful integration of the proposal with the surrounding area, illustrating that the development can positively integrate with existing uses and that the site can absorb the proposed development with no undue impacts on the visual amenities of existing residents. Refer also to the Landscape and Visual Impact Assessment prepared by DFLA for further information.
	Contribution to place-making;	The proposal will provide a significant improvement to the local area through the provision of a high-quality development and open spaces which will provide an excellent residential amenity for the local community.



District / Neighbourhood / Street	Contribution to the streetscape;	The proposed development provides for a positive, detailed, site-specific response to site and local context. The open space network provides for an attractive and diverse range of amenity and recreational opportunities, designed to link and integrate seamlessly with the existing high quality Knockrabo Phase 1 development adjacent, while respecting the character of the existing protected structures on site. Mature trees are retained where possible to provide high quality public open spaces. Equally the open space network enhances the strong urban design framework for the site.
	Avoidance of long monolithic walls;	The development provides for 5 No. blocks (inclusive of 2 No. duplex blocks) of varying lengths and heights ranging from 2 to part 8 storeys. The provision of high quality hard and soft landscaping will help to integrate the development into the surrounding environment.
	Contributes to the improvement of legibility;	Existing development in Phase 1, Knockrabo, and in Ardilea Crescent has laid down a high quality precedent which the proposed development will consolidate. As a whole the proposed development will make a significant contribution to the townscape of the wider area and the future context of the surrounding lands. Likewise, the proposed network of open spaces will prove good legibility and make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities for the future residents of the development.
	Contributes to the mix of uses and / or dwellings in the neighbourhood;	The development provides a mix of residential tenure and also provides residential tenant amenity space. A creche has been proposed in Cedar Mount House which will serve the residential scheme. A community hub is also proposed to be provided for residents.
Site / Building	Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light;	<p>The proposed blocks have been designed in order to provide a high standard of residential amenity for new and existing residents. A <i>Daylight, Sunlight and Overshadowing Report</i> and <i>Noise Impact Assessment</i> of Development Site have been prepared by IES and AWN respectively for submission with this application to DLRCC.</p> <p>Block heights reduce towards the boundaries of the site to ensure no undue impacts to the residential amenity of adjoining properties.</p>
Specific Assessments	Assessment of micro-climatic effects;	It is not expected that there will be any issue in relation to micro-climate due to the extent of the blocks and their layout within the site.
	Assessment of impacts for development locations proximate to bird and / or bat areas;	The site is not considered to be within an area of sensitivity for birds or bats. See enclosed AA Screening and EclA provided by Altamar.
	Assessment that the proposal allows for retention of telecommunication channels;	The proposed development will not impact any telecommunication channels, as heights of only two to eight storeys including podium are proposed.



	An assessment that the proposal maintains safe air navigation;	The proposed development will not impact safe air navigation as heights of only two to eight storeys including podium are proposed within an existing built-up area.
	An urban design statement;	An <i>Architects Design Statement</i> has been prepared by OMP Architects and details the design rationale for the proposal.
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	An SEA is not required. An AA Screening has been undertaken in respect of the proposal. An EclA has also been provided. An EIA Screening Report has also been prepared by TPA in respect of the proposed development.

Table 3.1: Applicant’s Response to the criteria set out in Section 3.2 in line with Policy SPPR3. (*Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*).

The development is designed to be architecturally sensitive to the site location and responds to the existing urban form.

Referring back to the aforementioned Guidelines in relation to sustainable urban development and apartment development, there is a suite of national planning policy that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the context of finite land supply, increased building height is an essential component of achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities.

In this context, the building height guidelines provide a mechanism through which building heights (and therefore densities), higher than those that may be permissible under the Development Plan, can be permitted (Section 6.4 refers).

The proposed heights are considered appropriate given the sites location and the site’s planning history. The development sits into the landscape as viewed in the photomontages that accompany the application and, in our opinion, complies with the Urban Development and Building Heights Guidelines for Planning Authorities 2018.

The proposed development, including 5 No. blocks (inclusive of 2 No. duplex apartment blocks), of two to eight storeys including podium, complies with the Guidelines. The proposed development provides for an appropriate residential density and has been designed to protect the residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

3.4 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)

These guidelines seek to promote high density apartment development on appropriately zoned land in appropriate locations in line with the above referenced National Planning Framework overarching policies in relation to encouraging residential development within existing urban settlements.

The Guidelines identify three broad types of locations suitable for apartment development and advises that Planning Authorities should have regard to these proximity and accessibility considerations.



Figure 3.5: Cover of *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* (2020).

The subject lands are approximately 2.4km (30-minute walk) from University College Dublin, and approximately 1.9 km (25-minute walk) from Dundrum Town Centre, which are large employers in the area. The site is c. 1.5km (23-minute walk) from Dundrum Luas Stop. Bus Routes No. 11 and No. S6 directly serve the subject site and are located within a 3-7 minute walk. The No. 11 is a high frequency route with buses every 15-20 minutes at peak hours.

The No. 11 route connects the site with Dublin City (7km/35 minutes bus journey) and Sandyford Business District (4.2km/19 minute bus journey) which is also a large employer in the County. Additionally, the development is 1.5km (15 mins walk) from a Quality Bus Corridor (QBC) with services to the city centre running every 6 minutes and similarly close to the Dundrum LUAS stop with services running every 7 minutes to the city centre.

In our opinion, the site is most appropriately defined as an 'Intermediate /Urban Location', which is defined as follows:

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

[Our emphasis]

Due to the site's location in proximity to urban bus services, Dundrum and employment locations, the proposed net density of 103.3 units per hectare is considered acceptable at this location. This brings the net density of the overall development of the Knockrabo lands to 65 units per hectare (inclusive of completed development at Phase 1 and Phase 1A Knockrabo lands).

The Guidelines also provide new apartment design standards that supersede Development Plan provisions in relation to:

- Apartment mix;
- Apartment sizes;
- Dual aspect ratios;
- Floor to ceiling heights; and
- Apartment to stair/lift ratios.

The Guidelines also provide standards in respect of:

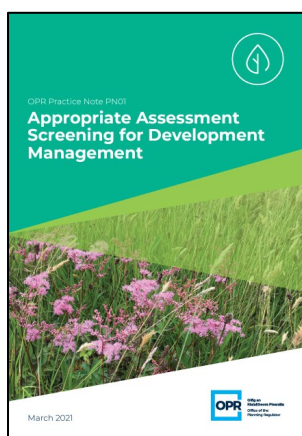
- Internal space standards, including storage spaces;

- Amenity spaces including balconies and patios; and
- Room dimensions.

Compliance with the above noted design provisions has been achieved in this development, full details in this regard are provided on the enclosed Housing Quality Assessment completed by OMP Architects. The HQA illustrates how each apartment meets or exceeds the relevant standards for example in respect to apartment size, internal areas, dimensions, private open space, dual aspect etc.

3.5 OPR Practice Note PN01 - Appropriate Assessment Screening for Development Management (2021)

This guidance, prepared by the Office of the Planning Regulator (OPR), provides information and guidance on screening for appropriate assessment during the planning application process.



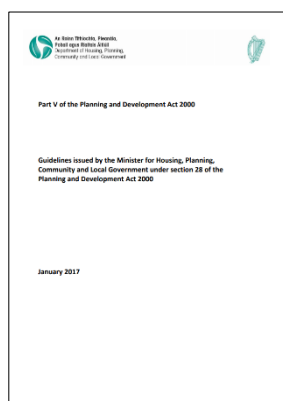
It indicates the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts and outlines the various implications for development management. It addresses issues of mitigation and avoidance of impacts.

The Habitats Directive (92/43/EEC) and the associated Birds Directive (2009/147/EC) are transposed into Irish legislation by Part XAB of the 2000 Act and the Birds and Natural Habitats Regulations 2011.2 The legislative provisions for appropriate assessment screening for planning applications are set out in Section 177U of the 2000 Act.

These Directives, as well as the Act, require any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) to be subject to an Appropriate Assessment.

An Appropriate Assessment Screening, prepared by Altemar Marine & Environmental Consultancy (AMEC), is submitted with this submission which concludes that the proposed development is not likely to have any significant effects on any Natura 2000 site.

3.6 Part V of the Planning and Development Act 2000: Guidelines (2017)



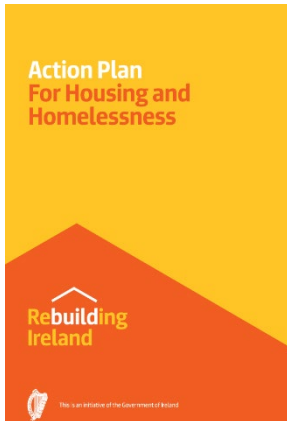
This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 Guidelines, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”

(Source: Part V of the *Planning and Development Act 2000: Guidelines (2017)*, p. 10.)

The Applicant has submitted information identifying 15 No. (c.10%) proposed Part V units, and related figures with this subject application. See Appendix A of this report and OMP drawing indicating location of Part V units.

3.7 Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)



In 2016, the Government launched Rebuilding Ireland which targeted solutions to the ongoing supply issues in the residential sector in the



Five Pillars of the Rebuilding Ireland Action Plan

This Plan sets ambitious targets 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, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

The development proposed will directly contribute to Pillar 2 seeking to ‘Accelerate Social Housing’, and Pillar 3 which seeks to ‘Build More Homes’. 158 No. residential dwellings are proposed in a mix of unit types and sizes to fit a broad tenure demand. 10% of the units are proposed for transfer as social and affordable housing. The scheme will therefore indirectly assist in Pillars 1 and 4 which seek to ‘Address Homelessness’ and ‘Improve the Rental Sector’, respectively.

3.8 Transport Strategy for the Greater Dublin Area 2016 – 2035



This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030. The Strategy includes five overarching objectives to achieve the vision which are as follows:

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

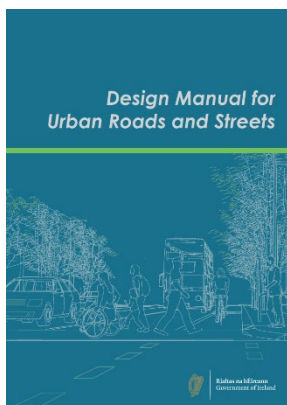
The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

The strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government’s transport 21 investment framework are included in all of the strategy options. One of these major infrastructure schemes is referred to as objective RAIL 9 which proposes the ‘upgrade of Luas green line to Metro (St. Stephen’s Green to Cherrywood/Bride’s glen)’. This infrastructure scheme is identified as one such measure which will help achieve each of the five overarching objectives of the Strategy listed above.

The proposed residential development, which provides for a gross density of 62 units per hectare (net density of 103.3 units per hectare), conveniently accessible to existing a range of public transport services (as discussed in Section 2.5 of this Report), is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

Please refer to the *Public Transport Capacity Analysis* prepared by Waterman Moylan for further information on public transport routes/corridors which are proximate to the subject site. In particular, we note Bus Routes No. 11 and S6, with bus stops within a 7 and 3 minute walking distances (respectively) of the subject site, as well as the planned Bus Connects Spine E, which is located 1.8km from the subject site and will offer peak trips frequencies of 4 minutes when fully operational.

3.9 Design Manual for Urban Roads and Streets (DMURS) (2019)

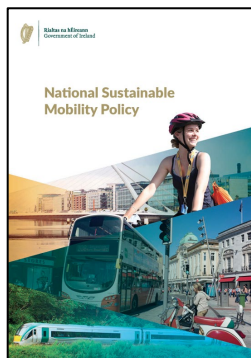


A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The principal design guidance of DMURS has been considered in the design of this development. The proposed development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.

The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement. Waterman Moylan have prepared an accompanying *Engineering Assessment Report* which contains a DMURS compliance statement, which confirms that the proposed development is consistent with the principles and guidance of DMURS.

3.10 National Sustainable Mobility Policy (2022)

The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel (walking and cycling) and public transport journeys to help Ireland meet its climate obligations. It is accompanied by an action plan to 2025 which contains actions to improve and expand sustainable mobility options across the country by providing safe, green, accessible and efficient alternatives to car journeys. It also includes demand management and



behavioural change measures to manage daily travel demand more efficiently and to reduce the journeys taken by private car.

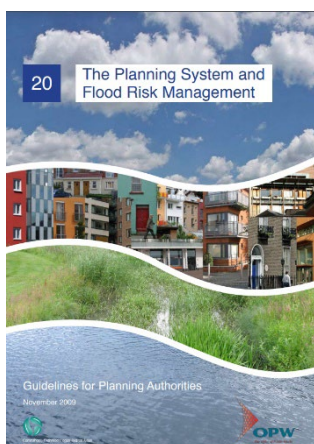
The policy aims to deliver at least 500,000 additional daily active travel and public transport journeys by 2030 and a 10% reduction in the number of kilometres driven by fossil fuelled cars. It will make it easier for people to choose walking, cycling and use public transport daily instead of having to use a petrol or diesel car.

Key to the achievement of these targets is better alignment between land-use and transport to minimise travel demand. The subject site is located within a 7-minute walk of a high frequency peak time Dublin

Bus service (the No. 11), operating at a peak frequency of 15-20 minutes, as well as Route No. S6, also with bus stops (2-3 minute walking distance) serving both directions, operating at a peak frequency of 20 minutes.

It is proposed to provide 130 No. car parking spaces, including 117 no. residential car parking spaces which amounts to c. 0.74 car parking spaces per residential unit based on the accessibility of the site to centres of employment and the high level of public transport available to the residents of the scheme. Furthermore 366 No. bicycle parking spaces (comprising 288 No. residential bicycle parking spaces and 70 No. visitor bicycle parking spaces) will be provided which is in excess of the *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018)* which would require 190 No. long and short term residential cycle parking spaces, and fully in accordance with Bicycle Parking Requirement as outlined in the Apartment Guidelines 2023.

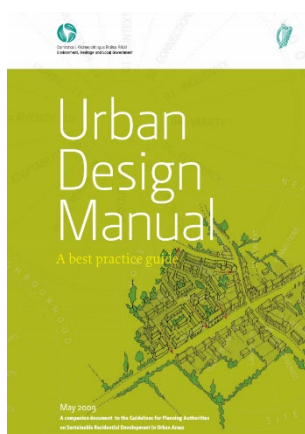
3.11 The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The guidelines require the planning system at all levels 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; 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.

Please refer to the accompanying Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers, which has been prepared in accordance with the Guidelines. In summary, the Assessment concludes that there is an extremely low likelihood subject site being liable to flood from fluvial, coastal or groundwater sources subsequent to relevant mitigation measures as outlined in the Site Specific Flood Risk Assessment prepared by Waterman Moylan. All sources indicate that there is a low risk of flooding on site and that the site is outside of any flood risk zone which is appropriate for residential or mix-used developments.

3.12 Urban Design Manual: A Best Practice Guide (2009)



The Design Manual sets out a series of 12 criteria, which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are listed below, with a response to each provided, which should be read in conjunction with the Architects Design Statement.

These principles are: Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy/Amenity, Parking and Detailed Design.

In short, the proposal’s response to the various criteria set out by the Guidelines may be summarised as follows:

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

Table 3.2 - 12 Urban Design Criteria (Source: Urban Design Manual May 2009)

The design strategy for the overall development scheme including the subject application of the Phase 2 lands remains consistent with the overall site strategy for the Knockrabo lands including, creation of significant public open space that retains mature trees along the northern edge of the site, as well as in front of Cedar Mount House, thus providing a significant quantum of high quality public open spaces for future residents of the scheme.

The subject scheme proposes three development zones with apartment blocks:

1. Block E, beside the site entrance, which frames the square with the existing oak tree and demarcates the entrance to the site;
2. Block F, which is on the footprint of permitted Blocks G/F in the extant permission, and is of similar scale, and incorporates a communal courtyard;
3. Block G, which is organised around a communal courtyard;

The building height strategy proposed follows a varied building height provision across the site where the buildings of relatively low height are located closer to Cedar Mount House and the taller structures are located closer to the northern boundary. Block F, including up to 8 No. storeys, maintains a generous separation distance of over 22 metres to the northern boundary, and over 16 metres to the eastern boundary, thus ensuring the protection of residential amenities of Knockrabo Phase 1 to the east of the site.

1. Neighbourhood Context: How does the development respond to its surroundings?

The proposed development has been designed to positively respond to the surrounding established residential developments. The proposed apartment blocks are designed to appropriate heights and include set-back upper levels to ensure that the residential amenity of adjacent properties and historic buildings are maintained and protected.

2. Connections: How well is the new neighbourhood / site connected?

The development's location close to Primary Schools and Secondary Schools, Dundrum Town Centre, University College Dublin and the LUAS Green Line means that the future resident population will have direct access to a range of facilities. Moreover, the proposed development is deemed to be highly permeable, with pedestrian and cycle connections to the adjoining Knockrabo Phase 1 development proposed, as well as proposed pedestrian and cycle links to the DEBP (architectural drawings prepared by OMP refer).

3. Inclusivity: How easily can people use and access the development?

The proposed development provides a range of residential unit types, including one-bedroom, two-bedroom, and three-bedroom apartments, and two-bedroom, three bedroom, and four bedroom houses, which will cater to a range of tenures, to meet the needs and requirements of all sectors of the community. A proposal for the provision of Part V housing has been issued to the Local Authority for approval (Appendix A refers).

The design of the scheme ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the Building Regulations. Accessible car parking provision is also provided in the development. High-quality, useable public open space is provided for within the development.

4. Variety: How does the development promote a good mix of activities?

As stated above, a mix of housing types and sizes is proposed to cater for a variety of housing needs and create a strong and sustainable mixed community. Moreover, the proposed development provides for a significant quantum of open space, as well as creche and community hub uses within Cedar Mount House.

5. Site Efficiency: How does the development make the appropriate use of resources, including land?

The proposal will connect to and make most efficient use of existing services and infrastructure. As stated above, the scheme will have a gross residential density of c. 62 No.

units per hectare (equating to net density of 103.3 units per hectare and net density of 65 units per hectare on the wider Knockrabo lands). We contend that this an efficient use of the underutilised suburban lands and supports the *NPF* and *RSES* objectives to consolidate development in Dublin.

6. Distinctiveness: How do the proposals create a sense of place?

The proposed landscaping scheme will ensure that the proposal assimilates well into its surroundings thus creating a sense of place. Furthermore, a quality design approach, has been adopted to ensure that the scheme integrates into the surrounding context and with Phase 1 development at Knockrabo.

7. Layout: How does the proposal create people-friendly streets and spaces?

The scheme layout caters for pedestrian desire lines and the entrance road has been designed to control speeds and encourage pedestrian movements. The layout also provides residential amenity space and a variety of informal play spaces at various accessible locations throughout the proposed development.

8. Public Realm: How safe, secure and enjoyable are the public areas?

Public open space is appropriately located in the scheme and is fully accessible for all residents and visitors. All open space areas are overlooked to provide natural surveillance.

9. Home Adaptability: How will the buildings cope with change?

House types are designed to be adaptable and capable of catering for cross-generational use. The design of the apartment buildings is disposed to future adaptation.

10. Privacy/Amenity: How do the buildings provide a high-quality amenity?

All dwellings enjoy dedicated private open space which is not unduly overlooked. Furthermore, as a result of generous setbacks between the proposed blocks and existing residential development, no adverse overlooking or overshadowing will arise as a result of the development.

11. Parking: How will the parking be secure and attractive?

The development proposes 130 no. car parking spaces for 158 No. residential units comprising of 54 no. residential podium car parking spaces, 63 no. residential on-street car parking spaces, 6 no. residential on curtilage car parking spaces, and 13 no. visitor on-street car parking spaces.

In addition to this, the development proposes to supply 2 No. Go Car spaces where each car sharing vehicle that is placed in a community has the potential to replace the journeys of up to 15 private cars. This equates to c. 0.74 spaces per residential unit which is considered to be appropriate with regard to the location of the site and its proximity to public transport and local amenities. This is in line with Government Guidance regarding reducing dependence on the private motor car and increasing use of public transport/cycling.

The development proposes a mix of podium, residential on-street, visitor on-street parking spaces which reduces the impact of the car parking provision for the proposed development. The provision of parking spaces at podium level ensures maximised levels of public open space areas which are interconnected across the subject development scheme, thereby protecting local amenity and increasing pedestrian connectivity across the site.

12. Detailed Design: How well thought through is the building and landscape design?

The design of the proposal has been a collaborative effort from its inception, with the various opportunities and constraints addressed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, and planning expertise) in an iterative manner. The proposal has also been informed by the expert inputs of the various specialist consultants to ensure that appropriate mitigation / avoidance measures are ‘designed into’ the scheme from the outset.

3.13 Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities



The Department’s policy statement *Delivering Homes, Sustaining Communities, Guidance* provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community. 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 *Delivering Homes, Sustaining Communities* policy statement is accompanied by *Best Practice Guidelines* entitled ‘*Quality Housing for Sustainable Communities*’. The purpose of these *Guidelines* is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes. They encourage best use of building land and optimal utilisation 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 scheme 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.

This planning application is accompanied by a *Housing Quality Assessment (HQA)* (for both apartment/duplex units, and house units) document prepared by OMP Architects which demonstrates the consistency of the proposed development with the relevant standards in the *Quality Housing for Sustainable Communities* document and the *County Development Plan* where relevant.

3.14 Quality Housing for Sustainable Communities (2007)



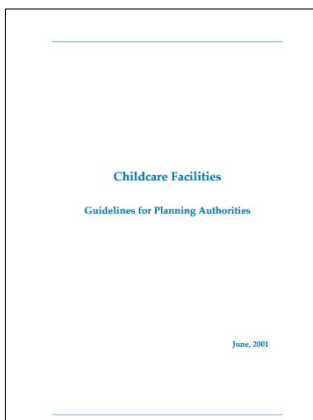
The stated aim of the *Quality Housing for Sustainable Communities, Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)* is to:

“identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant.”

These Guidelines along with the Development Plan standards for housing have informed the design of the 158 No. residential units (inclusive of 146 No. apartments) proposed in the scheme.

OMP Architects have provided a Housing Quality Assessment for the proposed residential units. This shows that the proposed apartments are compliant with the above Guidelines and Development Plan standards.

3.15 Childcare Facilities – Guidelines for Local Authorities (2001)



The *Childcare Facilities Guidelines (2001)*, generally recommend the provision of childcare facilities for residential development with 75 no. units or more, having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area.

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)* note that 1-bed or studio type units should not generally be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

In this case, a residential development of 158 No. units is proposed, 122 no. of those units are 2-bed units or larger. A childcare facility is proposed to form part of the development, in compliance with the Childcare Guidelines.

A *Childcare Capacity Audit* has been prepared which outlines the requirement for the inclusion of a creche facility within the Scheme. The *Audit* examines occupancy levels of existing childcare facilities proximate to the proposed development. We note 34 No. childcare facilities within 2km of the subject site, with an average enrolment of 90% (refer to Childcare Capacity Audit prepared by Tom Phillips + Associates for further information on this point).

In this regard, we note the proposal for a creche facility would be fully compliant with the provision of the Childcare Guidelines

3.16 Sustainable Residential Development and Compact Settlement Guidelines for planning Authorities, 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (Guidelines) were published on 15th January 2024 and set out national planning 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. The Guidelines outline indicative density ranges for a range of locations based on a range of accessibility considerations.

These Guidelines include the following recommendations with respect to density of development:

City – Suburban/Urban Extension

*Suburban areas are the lower density car orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that **residential densities in the range 40 dph to 80 dph (net) shall generally be applied** at suburban and urban extension locations in Dublin and Cork, and that **densities of up to 150 dph (net) shall be open for consideration at ‘accessible’ suburban/urban extension locations** (as defined in Table 3.8).*

[Our Emphasis]

In this context, the application site comes within the definition of a City-Suburban/Urban Extension, having regard to the location of the site within the established suburban neighbourhood of Goatstown, located c.7km from Dublin city centre. It is considered that the subject application at a net density of 103.3 units per hectare (application provides 30.6% public open space and net density across wider Knockrabo lands will be 65 units per hectare) is fully appropriate for the subject site, having regard to the site specific locational characteristics of the subject site.

SPPR 1 Separation Distances

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

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

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

[Our emphasis]

The proposed development has been designed to maximise the separation distances between the subject scheme and adjoining properties to the south. In this context, separation distances in excess of 16m are provided throughout. Refer to the architectural pack prepared by OMP Architects for further information.

Car Parking Provision

These Guidelines outline that:

“availability of car parking has a critical impact on travel choices for all journeys, including local trips”.

In locations in close proximity to existing amenities and services, a reduction in car parking provision is likely to encourage a modal shift from unsustainable modes of transport (such as the use of private vehicles) to more sustainable modes of travel such as walking and cycling. The Guidelines state that the car parking approach should;

*“take account of proximity to urban centres and sustainable transport options, in order to promote more sustainable travel choices. **Car parking ratios should be reduced at all urban locations**, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.”*

[Our emphasis]

We note, as per the LRD Opinion issued by DLRC, that the subject site is deemed to fall within the Suburban/Urban Extension area and is also deemed to be an intermediate location (*Suburban-Intermediate* as per LRD Opinion). Intermediate locations are defined as follows under the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*;

- *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 frequency (minimum 15 minute peak hour frequency) urban bus service.*

SPPR 3 of Guidelines further note the following in relation to intermediate locations:

“In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such



provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling”.

We highlight that this car parking ratio is identified as a maximum rate. Moreover, the subject site is deemed as an intermediate location proximate to existing high frequency/urban bus services. In this regard, we also note Section 5.3.4 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*;

“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... Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.”

As established above, the subject site is considered to constitute a City-Suburban/Urban Extension, located in the established suburb of Goatstown. Car parking is proposed to be provided at a rate of 0.74 spaces per unit. The site is within convenient location of a range of public transport services, supporting a reduction in car parking provision.

In this context, we refer the Council to the *Public Transport Capacity Analysis* prepared by Waterman Moylan Consulting Engineers. The Analysis concludes;

“the capacity of the existing public transport services has been demonstrated to be more than adequate to cater for existing demand and from future demand from residents living in the proposed development.”

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* seek to reduce the provision of car parking where possible and in this regard, we note the capacity of existing public transport is sufficient to absorb any additional demand from the subject site, having regard to the proposed car parking ratio of 0.74 No. spaces per unit.

Minimum Private Open Space Standards for Houses

The Guidelines (SPPR 2) outline minimum private open space standards for houses, as follows;

House Type	Minimum Private Open Space Standard
1 bed house	20 sqm
2 bed house	30 sqm
3 bed house	40 sqm
4+ bed house	50 sqm

Table 3.3: Minimum Private Open Space Standards for Houses (Source: Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024)

The house units within the proposed development will accord in full with the minimum private open space standards for houses, as per the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities. In this regard, we note 1389.9 sq.m of private open space is provided for proposed apartment and duplex units (representing the provision of 991 sq.m for apartments, and 398.9 sq.m for duplex units) while 1,088.6 sq.m of private open space is provided for the 12 No. proposed house units.

Refer to the Housing Quality Assessment and architectural pack prepared by OMP Architects for further information.

Cycle Parking and Storage

The Guidelines outline that safe and secure cycle storage facilities should be provided to meet the needs of residents and visitors. In this regard, the Guidelines (SPPR 4) note;

“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 locker.

Design – cycle storage facilities should be provided in a dedicated facility of permanent construction within the building footprint or, where feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”

Secure cycle storage is proposed to be provided, to ensure safe and secure storage for residents and visitors. Locations for secure cycle storage will be conveniently located for residents. Throughout the scheme, 366 No. cycle parking spaces are proposed, inclusive of 288 No. long term spaces, 70 No. short term spaces, and 2 No. long stay spaces to serve the proposed childcare facility. Refer to the architectural pack and Schedule of Accommodation prepared by OMP Architects for further information. It is therefore considered that the proposed development accord in full with the *Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)*.

4.0 LOCAL POLICY COMPLIANCE

This section of the report provides an account of the relevant local planning policy framework provided primarily by the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* ('the Development Plan').

4.1 Dún Laoghaire-Rathdown County Development Plan 2022-2028

4.1.1 Core Strategy & Settlement Strategy

The Core Strategy articulates the medium-to-longer term quantitatively-based strategy for the spatial development of the Dún Laoghaire-Rathdown area. In this regard, the Plan states that:

"The central focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan. As set out in Section 10(2A) of The Act, the Core Strategy shall inter alia:

- *Provide relevant information to demonstrate that the Development Plan and the Housing Strategy are consistent with the NPF, RSES and with specific planning policy requirements (SPPR's) specified in Section 28 Guidelines.*
- *Take account of any policies of the Minister in relation to national and regional population targets.*
- *Provide details in respect of the area in the Development Plan already zoned for residential and mixed-use zonings and the proposed number of housing units to be included in the area.*
- *Provide details in respect of the area in the Development Plan proposed to be zoned for residential use and mixed-use zonings and how the zoning proposals accord with national policy that development of land shall take place on a phased basis.*
- *Set out a settlement hierarchy for the area of the Development Plan.*
- *Provide relevant information to show that, in setting out objectives for retail development, the Planning Authority has had regard to any Section 28 Guidelines."*

As part of the Core strategy, it is an objective to carry out a regional HNDA analysis, as outlined in policy objective CS1:

"It is a Policy Objective to accord with the Housing Strategy and Housing Needs Demand Assessment 2022—2028 and to carry out a regional HNDA post adoption of the Plan and to consider varying the Plan if required. (Consistent with NPO 37 of the NPF)."

The Core Strategy Housing Target, as shown in Table 5.1, provides a housing target of 18,515 units for Dún Laoghaire-Rathdown for the period of 2020-2028. The subject site is identified as a location for Infill/Windfall units in the Development Plan's Residential Development Capacity Audit – Aggregate Data figure below.

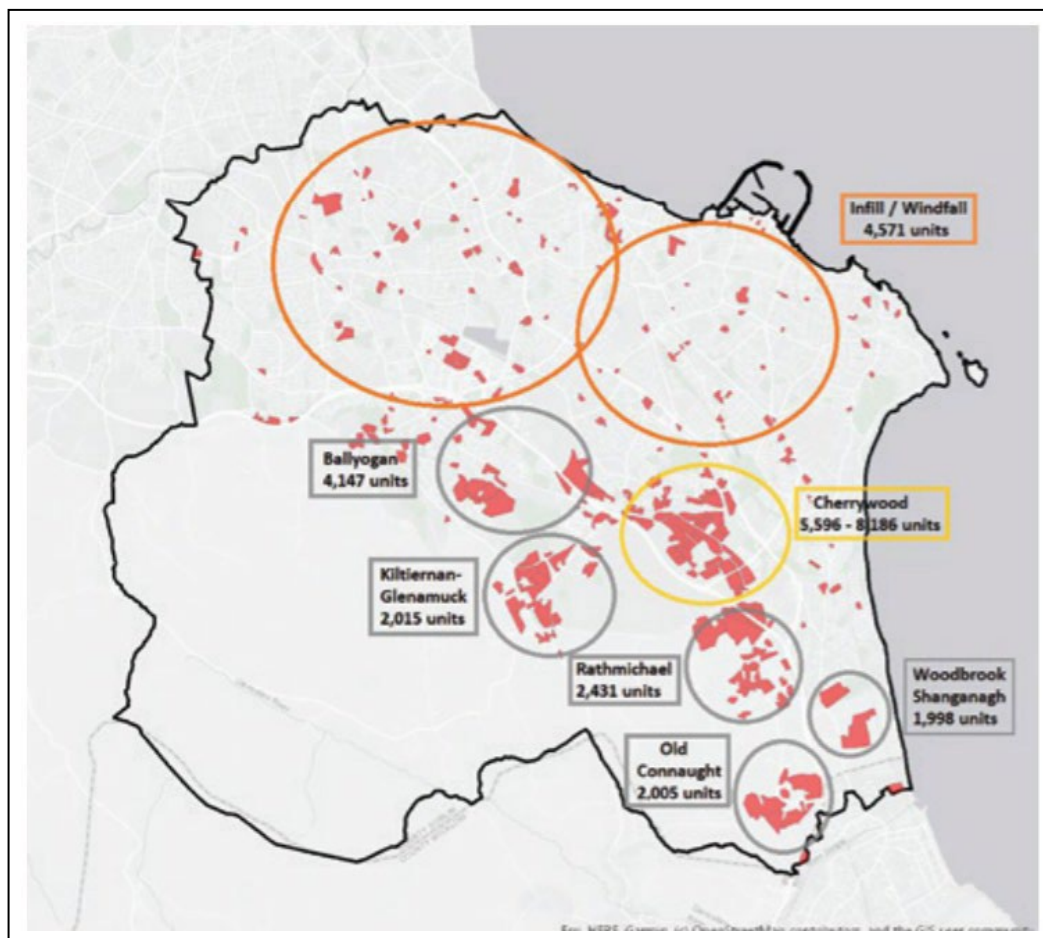


Figure 4.1: Residential Development Capacity Audit – Aggregate Data. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028.*)

	2016	Q1 2028 – RSES High Growth Scenario
Population	218,000	256,125
Increase in Population	N/A	38,125
Total Housing Stock	86,962	110,969
Housing Target (2016 – Q1 2028)	N/A	24,007
Minus CSO Housing Completions (2017 – Q1 2021) + Estimated Completions Q2 2021 – Q1 2022)	N/A	5,492
Housing Target (Q2 2022 – Q1 2028)	N/A	18,515

Table 4.1: Core Strategy Housing Target. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028, as amended.*)

4.1.2 Land Use Zoning Designation and Mapped Objectives

In the *County Development Plan*, the subject site is zoned Objective A – ‘To provide residential development and improve residential amenity while protecting the existing residential amenities’, as shown in Figure 5.2 below.



Figure 4.2: Extract from Zoning Maps 1 and 2 in Dun Laoghaire-Rathdown County Council Plan 2022 - 2028. (Source: *Dún Laoghaire Rathdown Draft County Development Plan 2022 -2028*)

ZONING OBJECTIVE ‘A’
<i>‘To provide residential development and improve residential amenity while protecting the existing residential amenities’</i>
Permitted in Principle
<i>Assisted Living Accommodation, Community Facility^a, Childcare Service^a, Doctor/Dentist etc.^a, Education^a, Health Centre/ Healthcare Facility^a, Open Space, Public Services, Residential, Residential Institution, Travellers Accommodation.</i>
Open For Consideration
<i>Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark^b, Caravan/Camping Park- Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry^c, Offices less than 200sq.m.^c, Offices in excess of 200 sq.m.^d, Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery</i>
<i>a: Where the use will not have adverse effects on the ‘A’ zoning objective, ‘to provide residential development and improve and improve residential amenity while protecting existing residential amenities’</i>
<i>b: Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.</i>
<i>c: less than 200sq.m.</i>



d: Only applies to A zoned lands subject to Specific Local Objective 122.

Table 4.2: Uses permitted in principle and open for consideration for lands zoned objective 'A'.
(Source: Table 13.1.2 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*).

'Residential', 'Community Facility' and 'Childcare Service' are uses which are 'Permitted in Principle' under the A zoning objective.

The proposed development is considered to be fully compliant with the A Zoning Objective of the Development Plan.

4.1.3 Protected Structures

There are 2 No. Protected Structures within the planning application site boundary. The buildings are within in the *Record of Protected Structures* as follows:-

Ref: 783
Structure Name: Cedar Mount
Location: Mount Anville Road, Goatstown, Dublin 14
Description: House

Ref: 796
Structure Name: Knockrabo Gate Lodge (West)
Location: Mount Anville Road, Goatstown, Dublin 14
Description: Gate Lodge (East) (Note: Entrance Gates and Piers also Protected Structures)

The Planning Application includes works to Cedar Mount, its former coach house building (which is within the attendant grounds); and works to its entrance gate and piers.

The application also includes works to refurbish Knockrabo Gate Lodge (West) to provide a restored residential dwelling.

As noted above, these works formed part of the expired planning permission relating to the subject site (D17A/1224).

In accordance with article 23(2) of the *Planning and Development Regulations 2001*, as amended, as well as LRD Regulations, this application includes a Conservation Report and architectural drawings which cumulatively, show how the proposed works will affect the above Protected Structures and buildings within their curtilage.

The works to the subject Protected Structures have been assessed by Slattery Conservation Architects, who conclude that;

"The proposed development is likely to have an imperceptible impact on the adjoining Protected Structures; 'The Garth', 'Thendara' and Hollywood House.

The proposed development will enhance the Protected Structures within the site: Cedarmount House, the Coach House in the curtilage of Cedarmount House and Knockrabo Gate Lodge West by providing a new use and an appropriate setting to those structures."

In this regard, it is considered that the proposed works constitute a range of appropriate refurbishment / reuse measures which will restore the historic fabric of the buildings.

It is considered that the works to Cedar Mount and associated wider landscaping proposals will open views to the public and provide an appropriate setting and context for Cedar Mount. The overall development has had specific regard to the location and setting of the building, including the positioning of Block E at over 45 metres from Cedar Mount, and screened by existing tree line.

It is considered that these conservation proposals ensure the character and setting of this structure is protected. Their inclusion as part of this development proposal will add to the overall quality and character of the development, as per development permitted in Phase 1 relating to Knockrabo Gate Lodge (East).

For all works relating to Cedar Mount, including the Repositioned Gate Access; Coach House building; and Knockrabo Gate Lodge (West) the Council is referred to drawings and Report *Cedar Mount, Mount Anville Road, Co. Dublin, Conservation Report & Design Proposals* prepared by Slattery Conservation Architects. (These drawings include plans and elevations of the existing structure, highlighting all proposed works.

4.1.4 Community Facilities

Policy PHP5: Community Facilities of the Development Plan states the following:

“It is a Policy Objective to:

- *Support the development, improvement, and provision of a wide range of community facilities throughout the County where required.*
- *Facilitate and support the preparation of a countywide Community Strategy”*

The proposed development includes a Childcare facility and Community rooms within Cedar Mount, serving the prospective and established residential community at Knockrabo, in accordance with Policy PHP5 of the Development Plan.

Section 12.3.2.3: Community Facilities of the Development Plan states the following:

“As a general principle the location and provision of community facilities is a pre-requisite to the creation and enhancement of viable, enjoyable, sustainable, and attractive local communities.

In assessing planning applications for leisure facilities, sports grounds, playing fields, play areas, community halls, organisational meeting facilities, medical facilities, childcare facilities, new school provision and other community orientated developments, regard will be had to the following:

- *Overall need in terms of necessity, deficiency, and opportunity to enhance or develop local or County facilities. Regard shall be had to the findings of a forthcoming Community Audit in this assessment (see Section 4.2.1.4 Policy Objective PHP5: Community Facilities).*
- *Practicalities of site in terms of site location relating to uses, impact on local amenities, desirability, and accessibility.*

- *Conformity with the requirements of appropriate legislative guidelines.*
- *Conformity with land use zoning objectives.”*

The proposed Childcare Facility is located close to the entrance of the site making it accessible to the general public arriving by foot or public transport, as well as residents of the scheme.

The proposed use complies with the site’s zoning objective.

4.1.5 Childcare Facilities

Policy PHP6: Childcare Facilities of the *Development Plan* states the following:

“It is a Policy Objective to:

- *Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.*
- *Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.”*

Furthermore, Section 4.2 states:

“In general, where a new residential development is proposed – with 75+ dwellings (or as otherwise required by the Planning Authority) – one childcare facility shall be provided on site in accordance with Sections 2.4, 3.3.1 and Appendix 2 of the ‘Childcare Facilities Guidelines for Planning Authorities’ (2001). The provision of childcare facilities within new, and indeed existing, residential areas shall have regard to the geographical distribution and capacity of established childcare facilities in the locale and the emerging demographic profile of the area.”

Section 12.3.2.4 (Childcare Facilities) of the *Development Plan* states the following:

“With the growing demand for childcare, there is equal recognition that childcare must be of suitably high quality. Childcare provision has also been recognised as one measure to address poverty and social exclusion. The Planning Authority will seek to facilitate the provision of childcare facilities in appropriate locations throughout the County and may require their provision in large residential, public community, commercial and retail developments in accordance with the provisions of the DEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001) and the Child Care (Pre-School Services) (No. 2) Regulations (2006) and Child Care (Pre-School Services) (No 2) (Amendment) Regulations (2006) (Department of Health and Children).

Where it is proposed or required to provide a new childcare facility as part of a new residential or commercial development, the facility shall be constructed in tandem with the overall scheme. To address the need for childcare and make childcare more accessible to everybody in the County, the developer shall seek to secure an operator and open the facility at an early stage preferably prior to the occupation of the residential units. In this regard, the developer shall submit phasing details for the

development and include details of the intended operation of the facility relative to the completion and occupation of dwellings / commercial buildings.

In assessing individual planning applications for childcare facilities, the Planning Authority will have regard to the following:

- *Suitability of the site for the type and size of facility proposed.*
- *Adequate sleeping/rest facilities.*
- *Adequate availability of indoor and outdoor play space.*
- *Convenience to public transport nodes.*
- *Safe access and convenient off-street car parking and/or suitable drop-off and collection points for customers and staff.*
- *Local traffic conditions.*
- *Number of such facilities in the area. In this regard, the applicant shall submit a map showing locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location.*
- *Intended hours of operation.*
- *Applications for childcare facilities in existing residential areas will be treated on their merits, having regard to the likely effect on the amenities of adjoining properties, and compliance with the above criteria.*
- *Detached houses or substantial semi-detached properties are most suitable for the provision of full day care facilities. Properties with childcare should include a residential component within the dwelling, and preferably should be occupied by the operator or a staff member of the childcare facility.*
- *For new residential developments, the most suitable facility for the provision of full day care should be a purpose built, ground floor, standalone property.*
- *In considering applications for new Childcare Facilities the Planning Authority will refer to Section 4.7 of the Design Standards for New Apartments Guidelines for Planning Authorities, (2018), specifically the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, as detailed in Section 4.7, with the exception for one-bedroom or studio type units, which 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*
- *In assessing applications for new childcare facilities, the Planning Authority will consult with the DLR County Childcare Committee to assess the need for the type of facility proposed at the intended location. (Refer to Section 12.4.10 in relation to car parking standards for childcare facilities)."*

The proposed Childcare Facility within Cedar Mount is conveniently located to serve both phases of this residential development within Knockrabo. The scheme includes considered vehicular and pedestrian routes have also been incorporated, to ensure safe, legible access to this facility, from Phase 1 and from Mount Anville Road.

It is considered that the facility, at 400 sqm GIA is of a sufficient scale to serve both phases of development at Knockrabo, in accordance with the Development Plan.

4.1.6 Climate Policies

Policy CA18: Urban Greening of the Development Plan states the following:

“It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).”

The Development Plan notes that; urban greening is the provision of planting, including trees, in urban areas and can include small pocket parks in between buildings, living/ green walls and green roofs. Urban greening creates mutually beneficial relationships between the population and the environment.

Section 12.2.6: Urban Greening of the Development Plan states the following:

“Applicants should explore the potential for urban greening in developments including:

- *High quality landscaping (including tree planting), that make use of a diverse range of species of plants – consistent with the National Pollinator Plan, site appropriate and irrigated by rainwater.*
- *Incorporating Nature-Based Solutions (NBS) into the design of buildings and layout – living/green walls, living/green and or blue roofs including in the design of small buildings and shelters, other soft Sustainable urban Drainage Systems (SUDS) measures such as swales, rain gardens, using trees for urban cooling and the reduction of wind tunnel effect (Refer also Section 12.8.6).*
- *The Council is investigating developing a green factor method through a multi-disciplinary approach as set out in Section 3.4.4.1 Urban Greening. Data on all surface cover types is required. All applications that submit a stormwater audit shall submit the surface cover types as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).”*

The proposed development includes a series of measures including the use of green roofs, permeable paving, swales and filter strips, as part of a Stormwater Management Strategy for the site. We refer the Council to the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers in this regard.

This strategy has also informed the landscape strategy for subject development proposal, as prepared by Dermot Foley Landscape Architects, as detailed in the Landscape Design Report as submitted with this pack.

4.1.7 Neighbourhood and Placemaking

Policy PHP2: Sustainable Neighbourhood Infrastructure states the following:

“It is a Policy Objective to:

- *Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- *Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- *Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.”*

The proposed development opens the subject site to public access, primarily by pedestrians and cyclists. The scheme includes a childcare facility and community hub, which will add to the existing neighbourhood infrastructure.

Policy PHP35: Healthy Placemaking of the Development Plan states the following:

“It is a Policy Objective to:

- *Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- *Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013).*
- *Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.”*

The proposed development has been designed in accordance with the above and provides for an attractive environment for residents and visitors.

Policy PHP36: Inclusive Design & Universal Access of the Development Plan states the following:

“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”

The proposed buildings have been designed to universal access standards providing for universal access.

Policy PHP40: Shared Space Layouts of the Development Plan states the following:

“It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the ‘shared space’ concept and guidance set out in the ‘Design Manual for Urban Roads and Streets’ (2013).”

The proposed development will incorporate roads which are designed as shared spaces. The proposed development is fully compliant with DMURS and the Development Plan in this regard.

Policy T11: Walking and Cycling of the Development Plan states the following:

“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm and permeability improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)”

The proposed development accommodates pedestrian activity throughout the site incorporating walking routes. Internal roads are designed as a shared surfaces with traffic calming measures in place, which will be attractive to cyclists. Cycle parking is distributed across the site. The scheme facilitates pedestrian/cyclist connections to adjoining Phase 1 lands, and the adjoining DEBP lands.

Policy T17: Travel Plans of the Development Plan states the following:

“It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)”

A Travel Plan has been prepared by Waterman Moylan Consulting Engineers in compliance with Policy T17. The proposed development is located within 1.5km of the Dundrum and Balally Luas stops, in addition to 2-7 minute walking distance from bus stops on Mount Anville Road and the Drummartin Road. The proposed development will encourage more sustainable modes of transport. The proposed development will provide for 366 No. bicycle parking spaces, further promoting a shift to sustainable modes of transport – with cycle parking provision exceeding Development Plan and Compact Settlement Guidelines (2024) minimum standards.

Policy T26: Traffic and Transport Assessments and Road Safety Audits of the Development Plan states the following:

“It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII’s ‘Traffic and Transport Assessment Guidelines’ (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.”

A *Traffic and Transport Assessment* including a *Road Safety Audit* are enclosed, prepared by Waterman Moylan. The TTA demonstrates the proposed development can be accommodated at the subject site with a negligible impact on the receiving transportation network, which has ample spare capacity to cater for the modest volumes of traffic generated.

The *Road Safety Audit* process identified some items that were subsequently addressed.

Policy T27: Traffic Noise of the Development Plan states the following:

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

The subject site is located a sufficient distance from Mount Anville Road such that no undue adverse impact from these facilities will be experienced by residents of the scheme. A significant quantum of proposed units are set back from Mount Anville Road, with the most proximate units to Mount Anville Road in Block E benefitting from screening from both existing mature trees as well as proposed tree planting.

4.1.8 Green Infrastructure and Biodiversity

Policy GIB1: Green Infrastructure Strategy of the Development Plan states the following:

“It is a Policy Objective to continue to implement, and update, the DLR Green Infrastructure (GI) Strategy, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development, design and management of high quality natural and semi-natural areas. This recognises the ecosystems approach and the synergies that can be achieved with regard to sustainable transport, provision of open space, sustainable management of water, protection and enhancement of biodiversity.”

Policy GIB18: Protection of Natural Heritage and the Environment of the Development Plan states the following:

“It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as ‘Stepping Stones’ for the purposes of Article 10 of the Habitats Directive.”

Policy GIB22: Non-Designated Areas of Biodiversity Importance of the Development Plan states the following:

“It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I

habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire-Rathdown Version 2014)."

Policy GIB29: Nature Based Solutions of the Development Plan states the following:

"It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species."

The proposed development is supported by a significant landscaping proposal which ensures the delivery of high-quality open space, including the retention of special landscape features such as mature trees, and local biodiversity enhancements and the delivery of a significant SuDS scheme.

Furthermore, from an ecological and Habitats Directive perspective, the submission is supported by an Appropriate Assessment Screening Report and full Ecological Impact Assessment Report.

Having regard to the following sections which address the development management standards, we confirm that the proposed development complies with the overarching themes contained within the County Development Plan.

4.1.9 Open Space, Parks and Recreation

Policy OSR4: Public Open Space Standards of the Development Plan states the following:

"It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2018)."

Policy OSR5: Public Health, Open Space and Healthy Placemaking of the Development Plan states the following:

"It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilities people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16)."

Policy OSR7: Trees, Woodland and Forestry of the Development Plan states the following:

“It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach.”

Policy OSR13: Play Facilities and Nature Based Play of the Development Plan states the following:

“It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people - are facilitated in the public parks and open spaces and the public realm of Dún Laoghaire – Rathdown.”

In terms of play provision, the extensive open space network proposed provides for a broad variety of play and play spaces, both formal and informal. The proposed development provides for a significant quantum of public open space at 30.6%. Moreover, a significant quantum of existing mature trees are proposed to be maintained and incorporated into these public open spaces.

4.1.10 Environmental Infrastructure

Policy EI3: Wastewater Treatment Systems of the Development Plan states the following:

“It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.

It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution.

It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.”

The proposed development will be served by the public network.

Policy EI4: Water Drainage Systems of the Development Plan states the following:

“It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)”

The proposed development provides for separate foul and surface water drainage systems.

Policy EI6: Sustainable Drainage Systems of the Development Plan states the following:

“It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).”

The proposed development incorporates SuDS as detailed in Waterman Moylan Consulting Engineers’ *Engineering Services Report*.

Policy EI8: Groundwater Protection and Appropriate Assessment of the Development Plan states the following:

“It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water’s Water Safety Plans to protect sources of public water supply and their contributing catchment.”

Groundwater will be considered in the EIA Screening and associated environmental assessments prepared by Altemar, AWN, and Waterman Moylan. However, the proposed development is a residential development in a built up area and is considered unlikely to have any adverse impact on groundwater.

Policy EI9: Drainage Impact Assessment of the Development Plan states the following:

“It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council’s Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).”

A *Stormwater Audit* is enclosed with the submission, as prepared by Waterman Moylan.

Policy EI14: Air and Noise Pollution of the Development Plan states the following:

“It is a Policy Objective:

- *To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES),*
- *To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website www.epa.ie/air/quality.*
- *To support the implementation of objectives of the ‘Dublin Agglomeration Environmental Noise Action Plan 2018-2023’.”*

The proposed development is a residential development in a built-up area and is unlikely be subject to, or generate, air and noise pollution. Refer to the *Noise Impact Assessment* prepared by AWN and the *Construction Management Plan* prepared by WM for further information.

Section 12.8.6.2: SuDS (Sustainable Drainage Systems) of the Development Plan states the following:

“SuDS measures, such as attenuation storage systems, including detention basins that come into regular operation after rainfall events, shall not normally be included in the calculation of open space provision. Where a SuDS scheme provides biodiversity and amenity value and is readily accessible for either use or enjoyment in most weather conditions, a proportion of the SuDS area could be incorporated as a component part of the communal or public open space provision.

This proportion will be decided by the Planning Authority on a case-by- case basis. The Council will also encourage the use of bioswales in roadside verges, and open spaces.”

Section 12.8.6.3: Green Roofs /Blue roofs of the Development Plan states the following:

“The use of green roofs/blue roofs in accordance with the requirements of the Dún Laoghaire Rathdown County Council’s ‘Green Roof Policy, (See Appendix 7.2) forms part of an integrated approach to the provision of green infrastructure. This approach takes particular account of the benefits in terms of SuDS provision, nature-based solutions, biodiversity benefits, urban greening, urban cooling, and the potential for additional amenity space, particularly in high density development contexts. The provision of green and blue roofs within any development, however, shall not normally form part of the overall minimum open space (public or communal) provision but should complement the required open space provided within the site.

Applications for developments with a roof area $\geq 300\text{sq.m}$. shall provide Green Roofs in accordance with ‘Dún Laoghaire – Rathdown County Council’s Green Roof Policy’ (2020).

Green or living roofs on smaller structures are also encouraged by the Council. These can function as smaller urban greening measures which as well as being a SUDS feature, are a useful wildlife habitat, can trap carbon and contribute to urban cooling. There is good potential for living roofs on bike and bin stores, bus shelters, detached habitable rooms and garages. Living roofs can be designed to incorporate a diverse range of pollinator friendly species which are drought tolerant and therefore do not require supplementary watering. Added features such as insect hotels and bird boxes can be incorporated into the design.”

Waterman Moylan Consulting Engineers’ *Engineering Services Report* details the proposed development SUDS measures, these include green roofs, permeable paving, swales and tree pits, attenuation tanks and low water usage appliances.

4.1.11 Heritage and Conservation

Policy HER1: Protection of Archaeological Heritage of the Development Plan states the following:

“It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments.”

Policy HER2: Protection of Archaeological Material in Situ of the Development Plan states the following:

“It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG).”

The site does not include any site on the Record of Monuments and Places.

Policy HER8: Work to Protected Structures of the Development Plan states the following:

“It is a Policy Objective to:

- I. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- II. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the ‘Architectural Heritage Protection Guidelines for Planning Authorities’ published by the Department of the Arts, Heritage and the Gaeltacht.*
- III. Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise.*
- IV. Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.*
- V. Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.*
- VI. Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.*
- VII. Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.*
- VIII. Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure.*
- IX. Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- X. Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES).”*

Policy HER9: Protected Structures Applications and Documentation of the Development Plan states the following:

“It is a Policy Objective to require all planning applications relating to Protected Structures to contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning Regulations and Chapter 6 and Appendix B of the ‘Architectural Heritage Protection Guidelines for Planning Authorities’, or any variation thereof.”

Policy HER10: Protected Structures and Building Regulations of the Development Plan states the following:

“It is a Policy Objective to protect the character and special interest of Protected Structures when considering or carrying out interventions to comply with the requirements of the Building Regulations - with particular reference to Part B and Part M.”

Policy HER11: Energy Efficiency of Protected Structures of the Development Plan states the following:

“It is a Policy Objective to have regard to the Department of Environment, Heritage and Local Government’s publication on ‘Energy Efficiency in Traditional Buildings’ (2010) and the Irish Standard IS EN 16883:2017 ‘Conservation of Cultural Heritage - Guidelines for Improving the Energy Performance of Historic Buildings’ (2017) and any future advisory documents in assessing proposed works on Protected Structures.”

Section 12.11.2: Architectural Heritage - Protected Structures of the Development Plan states the following:

“All planning applications for works to a Protected Structure must include an Architectural Heritage Impact Assessment in accordance with Appendix B of the DAHG ‘Architectural Heritage Protection Guidelines for Planning Authorities’, to assist in the assessment of proposals. This report should be prepared by an accredited conservation architect or equivalent (a list of suitably qualified professionals is available on the Irish Georgian Society and RIAI websites). The report should:

- *Outline the significance of the building(s).*
- *Include a detailed survey of the building identifying all surviving original/early features and associated photographic survey.*
- *Include a method statement and specification of works.*
- *Details of proposed works should be clearly identified on the accompanying survey drawings by way of colour coding and/or annotated notes to distinguish clearly between the existing structure and the proposed work.”*

Section 12.11.2.2: Change of Use of a Protected Structure of the Development Plan states the following:

“In most instances the original use for which a structure was built will be the most appropriate. However, in certain cases a change of use may be considered appropriate and may help to safeguard the Protected Structure status of a building.

In assessing a proposed change of usage, or the reuse of a redundant building, regard should be had to the compatibility of such use, in terms of its impact on the character, and special interest of the structure. All proposed changes of use must comply with the zoning objectives for the site.

Any interventions that are necessitated by such works, should seek to cause minimum interference with the floor plan, and fabric of the building when complying with relevant Building Regulations. Matters such as, fire protection, sound proofing, servicing and access will require detailed consideration at initial design stage.”

Section 12.11.2.3: Development within the Grounds of a Protected Structure of the Development Plan states the following:

“Any proposed development within the curtilage, attendant grounds, or in close proximity to a Protected Structure, has the potential to adversely affect its setting and amenity. The overall guiding principle will be an insistence on high quality in both materials, and design, which both respects and complement the Protected Structure, and its setting.

Any development must be consistent with conservation policies and the proper planning and sustainable development of the area. Considering recent changes to National Policy, (including the 20128 DHPLG, ‘Urban Development and Building Heights Guidelines for Planning Authorities’, a balance must be struck between allowing compact development, while protecting the Architectural heritage and historic building stock within the County.

All planning applications for development in proximity to a Protected Structure must be accompanied by a design statement, with supporting illustrative material, demonstrating how it has been developed having regard to the built heritage, topography, and landscape character of the site. An accredited conservation architect or equivalent should be engaged at the outset of the design process to assist in determining the appropriate siting of the development in order to minimise the impact on the Protected Structure. It may be of benefit to discuss specific requirements, at pre-planning stage.”

The *Design Statement* prepared by OMP Architects sets out the design principles for the proposed development. The submission also includes a *Report on the Architectural/Historical Significance* prepared by Slattery Architects.

The Protected Structures and their setting have informed the development of the proposed scheme. The proposed development seeks to maintain and reuse the historic features that add to the character of the site, including Cedar Mount house, and associated protected structures, and many of the mature trees. The proposed development will also provide for public access to the grounds. We note that all of the proposed works to the protected structures has been permitted under permission DLRCC Re. Ref. D17A/1224. In this regard,

the application represents a considered proposal, which seeks to respect the existing character of the protected structures, and does not propose works above and beyond what has previously been permitted under D17A/1224.

4.1.12 Housing Policy

In addition to the policy support for increased housing delivery in Dublin, as outlined within the Core Strategy, this section sets out a number of key *Development Plan* policies relevant to new housing.

4.1.13 Residential Density

Section 4.3.1.1 of the Development Plan relates to residential density and contains Policy PHP18: Residential Density which states the following:

“It is a Policy Objective to:

- *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”*

The proposed development has a gross residential density of 62 units per hectare and, having regard to the locational characteristics of the subject site, is compliant with local and national policy objectives which emphasise the requirement for increased residential densities on well located sites in existing urban areas.

This submission confirms that the proposed development has been designed to an appropriate scale to ensure it does not give rise to unacceptable impact upon the surrounding context from both a residential amenities and visual impact perspective.

Residential Density is discussed in Section 6.9 of this Statement of Consistency, in relation to Compliance with Development Management Standards outlined in the Development Plan.

4.1.14 Overall Housing Mix

Section 4.3.2.3 of the *Plan* relates to housing mix and contains Policy PHP27: Housing Mix which states:

“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”

The proposed development provides a range of residential unit types, including one bedroom, two-bedroom (three person), two-bedroom (four person), three-bedroom apartments and

duplexes and two, three and four-bedroom houses. The 158 No. units will provide a new form of housing in the local area and represent a coherent extension of the Knockrabo Phase 1 lands.

A proposal for the provision of Part V housing has been issued to the Local Authority for approval and a validation letter, agreeing to the principal of the proposed provision has been received.

Please refer to the enclosed Housing Quality Assessment Report, prepared by OMP Architecture, which outlines further information in relation to unit type, mix and associated facilities.

4.1.15 Social Housing (Part V)

Policy PHP31: Provision of Social Housing in section 4.3.2.6 of the Development Plan notes the following respect of Social Housing (Part V):

“It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.”

The proposed development is subject to the requirements of the Part V of the Planning and Development Act 2000 (as amended). A proposal for the provision of Part V housing has been issued to the Local Authority for approval and a validation letter has been received from the Local Authority.

4.1.16 Phasing Schedule

A phasing schedule for any such development shall be submitted with a planning application. Section 12.11.2.3 of the *Development Plan* refers to the phasing of residential developments within the curtilage of a protected structure:

“Where a Protected Structure is part of a larger development then the phasing of the works needs to ensure that those relating to the Protected Structure take place early on, preferably first, or in tandem (as agreed by the Planning Authority), so that the conservation, and use of the Protected Structure is secured at the start of the project.”

Section 12.3.4.4 further notes that a phasing schedule for such developments shall be submitted with a planning application.

The development is proposed to be completed in a single phase.

5.0 DEVELOPMENT MANAGEMENT

Chapter 12 of the *Development Plan* has the stated aims of ensuring orderly and sustainable development through the use of objectives and standards for development management. Development standards pertinent to the subject site are summarised below.

5.1 Healthy Placemaking

Policy PHP35: Healthy Placemaking in section 4.4.1.1 of the *Plan* states the following:

“It is a Policy Objective to: Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES. Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013). Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.”

The proposed development complies with the ‘*Urban Design Manual – A Best Practice Guide*’ (2009), accordingly, we note that the proposed development has been fully assessed and designed with cognisance of the existing context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.

5.2 Design Statements

Policy PHP44: Design Statements in Section 4.4.1.10 of the *Plan* requires the preparation of Design Statements for residential developments:

“It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.”

A Design Statement prepared by OMP Architects is enclosed, this responds to the *Urban Design Manual - A Best Practice Guide, 2009*.

5.3 Public Realm Design

Policy PHP37: Public Realm Design and Policy PHP38: Public Realm Offering, in section 4.4.1.3 of the *Plan* states the following in respect of public realm:

“It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.”

“It is a policy objective to preserve and enhance the public realm offering in our towns and villages.”

Dún Laoghaire-Rathdown County Council recognises the social and non-commercial value of the public realm and commercial activity is not the sole objective of outdoor public realm improvements. The Council will develop an outdoor realm policy that will enhance offerings including, but not limited to, street furniture; pedestrianisation of streets; outdoor vendors; safe, public breastfeeding spaces and litter management. All ages and backgrounds should be included in the consideration of public realm improvements.”

The design of the proposed buildings has maximised the amount of active frontage at ground floor level to ensure natural surveillance and a positive relationship between the buildings and proposed public realm.

In addition to this, the proposed development provides an additional access point, in addition to facilitating the creation of further pedestrian and cycle connections between the subject site and Phase 1 lands, enhancing the permeability of the public realm within the surrounding area. Importantly, the proposed development will also provide a significant quantum of public open space which incorporates large areas of green space, existing mature landscape features and shared surface/hard landscaped areas.

In accordance with this policy, DFLA has prepared the enclosed *Landscape Design Rationale*, which illustrates the design rationale for the landscaping and measures proposed to ensure that the development complements the surrounding area and contributes positively to an enhanced public realm.

5.4 Building Height Strategy

Policy PHP42: Building Design and Height Section of the *Development Plan* states the following in respect of building height:

“It is a Policy Objective to:

- *Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”*

Appendix 5 ‘*Building Height Strategy*’ further details *Development Plan* policy in relation to building height.

In relation to a ‘Residual Suburban Area²’, Section 1.1 of the Building Height Strategy outlines the changes made to the previous *Development Plan* (2016-2022):

“In order to align with guidance³, the maximum heights for what were called the residual suburban areas have been removed, as have the upward and downward modifiers. They have been replaced with a very comprehensive set of performance-based criteria for development management assessment of applications for increased height thus ensuring increased height in appropriate location, whilst protecting residential amenity and other assets of the County.”

² Areas not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective F, B, G or GB are termed residual suburban areas.

³ Referring to “Urban Development and Building Heights, Guidelines for Planning Authorities” (December 2018).

Section 4.3 of the Building Height Strategy identifies amenity and environmental considerations, some of which apply to the site to various degrees:

*“The Guidelines state that “Appropriate identification and siting of areas suitable for increased densities and height will need to **consider the environmental sensitivities of the receiving environment as appropriate**, throughout the planning hierarchy.” There are a number of environmental sensitivities in the County of DLR which contribute to the uniqueness and identity of the County. **These sensitivities have fed into the formulation of the performance based criteria** set out in section 5.*

4.3.1 Architectural Conservation Areas There are 26 designated Architectural Conservation Areas (ACAs). Policy AR8: Architectural Conservation Areas (ACA) states that it is Council policy to protect the special character of places, areas, groups of structures or townscapes, which have been designated as Architectural Conservation Areas. While the purpose of a designation is to protect and enhance the special character of an area, it is important to stress that this does not preclude any appropriate forms of new development. Impact on ACAs is included in the Performance Based Criteria set out in Section 5.

4.3.2 Protected Structures Dún Laoghaire-Rathdown features a wealth of built heritage that has been amassed over many centuries through previous generations. Our built heritage including a varied array of Protected Structures. The central issue in relation to our built heritage is striking a balance between the protection and enhancement of this enviable heritage asset while ensuring the continued development of the County through the 21st Century. New developments should respond to local character and protect and enhance the built heritage and new buildings should not have an adverse effect on a protected structure in terms of scale, height, massing, alignment and materials. Impact on Protected Structures is included in the Performance Based Criteria set out in Section 5.”

[Our emphasis.]

Section 4.4 (Policy Approach) of the Building Height Strategy further states:

“To ensure application of the 4 SPPRs and having regard to the other content of the Guidelines a number of policies have been formulated, which support increased building height and/or taller buildings at appropriate locations while ensuring adequate protection of residential amenities and the very unique character and environmental sensitivities of the County. A very detailed Performance Management Criteria table has also been developed. It is overall policy that all proposals for increased height and/or taller buildings;

- **over and above the benchmarks of three to four storey in what are called residual suburban areas**
- *in other identified areas as set out in Policy BH1 below*
- *above what is set out in any of the Local Area Plans or*
- *above any other specified heights in this plan (SUIP)*

must be assessed in accordance with the criteria set out in Section 5.

Areas not covered by an existing or forthcoming Local Area Plan or other guidance and not covered by any particular environmental sensitivity as set out above are termed residual suburban areas. The Cherrywood area is covered by the approved Planning

scheme as amended. Areas zoned G, GB, B and F have some of the most restrictive zoning objectives in the County. A small number of uses are either permitted in principle or open for consideration. There may sometimes in these areas be instances where there may be an argument for increased building heights and this may be acceptable subject to meeting the overall zoning objective for the area and subject to the development being appropriate in terms of its scale, height and massing. Given the restrictive zoning objectives on these lands the possibility of taller buildings is effectively negated.” [Our emphasis.]

Section 4.4.1.8 of the Development Plan notes the following in respect of building height:

“The Council policy in relation to building height throughout the County is detailed in three policy objectives as set out in the Building Height Strategy (BHS) (Appendix 5):

- *Policy Objective BHS 1- Increased Height.*
- *Policy Objective BHS2 – Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan).*
- ***Policy Objective BHS 3 - Building Height in Residual Suburban Areas.***

The BHS also contains a detailed set of performance-based criteria for the assessment of height so as to ensure protection of the unique amenities of the County whilst also allowing increased height.

In accordance with the policies set out in the BHS, where an argument is being made for increased height and/or a taller building and the Applicant is putting forward the argument that SPPR 3 of the ‘Urban Development and Building Height; Guidelines for Planning Authorities’ (2018) applies, the Applicant shall submit documentation to show that compliance with the criteria as set out in Table 5.1 ‘Performance Based Criteria’ of the BHS (see Appendix 5).”

[Our emphasis.]

Policy Objective BHS 3 Building Height in Residual Suburban Areas states:

“It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.

Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”

The Strategy acknowledges that greater height can be provided on lands where it can be demonstrated that the proposal complies with the criteria outlined in Table 5.1 under Section 5 of Appendix 5, Building Height Strategy.

The proposed development is assessed against the ‘Performance Based Criteria’ outlined in Table 5.1 of the Building Height Strategy in the table below.

Compliance for All Such Proposals	DM Requirement (where relevant)	Scheme Compliance with Criteria
At County Level		
Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.		The subject site is located within an existing built-up area, its development contributes to the compact development of Dublin. The site is also an infill site, close to high frequency public transportation and is zoned for residential development.
Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport.*		With respect to public transport the site is within 1.5km of Luas green line stops at both Balally and Dundrum. A number of bus stops and services are identified in the <i>Public Transport Capacity Analysis</i> prepared by Waterman Moylan, including stops on Mount Anville Road (within 2-3 minute walk) an Goatstown Road (within an 7 minute walk of the site).
Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.	Landscape and visual assessment by suitably qualified practitioner. Urban Design Statement. Street Design Audit (DMURS 2019).	<p>Please refer to the accompanying and <i>Design Statement</i> prepared by OMP Architects.</p> <p>The proposed development has been designed in response to the site’s characteristics and context; as an infill site with a number of protected structures. The proposed development maintains the existing character of the protected structures, while ensuring compliance with DMURS (Quality Audit prepared by Roadplan Consulting refers).</p> <p>The scheme successfully integrates into the area, it utilises the topography of the site which is lower than some of the adjoining sites. The site layout has had regard to the setting of Cedar Mount House and has persevered a formal open space in front of the house and provided glimpsed views of the house from Mount Anville Road. Refer to the LVIA prepared by DFLA for further information.</p>



		Mature trees are also retained where possible.
Protected Views and Prospects: Proposals should not adversely affect the skyline, or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.		The subject site is not included in any protected views or prospects identified in Development Plan Maps.
Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.		The subject site is located within a serviced urban area, and the existing infrastructure is in place to cater to the proposed development.

At District/Neighbourhood/Street Level		
Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.	Proposal should demonstrate compliance with the 12 criteria as set out in <i>Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities, 2009</i> . Street Design Audit (DMURS 2019).	Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects for compliance with the 12 criteria set out in <i>Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities 2009</i> , which demonstrates that the proposed development responds to its natural and built environment. Refer to Quality Audit prepared by Roadplan Consulting refers for information on compliance with DMURS. The scheme will contribute to the neighbourhood and streetscape by incorporating public access to the open space and the Protected Structures.
Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.	Design Statement.	Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects. Materials and textures are used to breakup the facades of the proposed new buildings.
Proposal must show use of high quality, well considered materials.	Design Statement. Building Life Cycle Report.	Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects. Materials selected are high-quality and durable.
Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.	Must also meet the requirements of " <i>The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009</i> ".	The proposed development does not adjoin any public spaces or key thoroughfares; however, it does provide access to a previously private site, including new public open spaces.



		<p>The proposal has been subject to a Flood Risk Assessment prepared by Waterman Moylan which concludes “the residual risk of flooding from any source is low.”</p> <p>Therefore the proposals are in line with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities 2009.</p>
<p>Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.</p>		<p>The proposed buildings do not adjoin the public street.</p> <p>However, the proposal will result in the site being opened to public access.</p>
<p>Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.</p>	<p>Design Statement.</p>	<p>Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects.</p> <p>The proposed development introduces a residential scheme providing 158 No. additional units (including 146 No. apartments and duplexes) in a part of the city primarily characterised by large, traditional family homes.</p> <p>The scheme also provides a Childcare Facility and community room which will be open to the public.</p>
<p>Proposal should provide an appropriate level of enclosure of streets or spaces.</p>	<p>Design Statement.</p>	<p>Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects and the Landscape Design Statement prepared by DFLA. The relationship between the existing and proposed buildings and internal streets has been carefully considered in the design of the scheme.</p>
<p>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>		<p>The proposed development provides for a housing and apartment scheme within an existing mature landscape, the positive attributes of the site, particularly mature trees, are retained and reinforced. Landscaping is designed to encourage active engagement with the different character areas, including the more formal central open space, more natural peripheral walks.</p> <p>The public Childcare Facility and the Residents Internal Amenity spaces are distributed throughout the site to encourage access.</p>
<p>Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>		<p>The proposed development will open the site up to public access, allowing the public to enjoy the setting of Cedar Mount House, a Protected Structure.</p>



<p>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</p>		<p>The design considers the adjoining developments, with the scale of the buildings decreasing where they are closest to the boundaries. Mature boundary planting is retained where possible to mitigate impacts.</p>
<p>At Site/Building Scale</p>		
<p>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</p>	<p>Must address impact on adjoining properties/spaces</p>	<p>Please refer to the accompanying <i>Daylight Sunlight and Overshadowing Report</i> prepared by IES Consulting Engineers. We note the proposed scheme is compliant with BSEN Standards, including with respect to daylight/sunlight to existing Phase 1 blocks.</p>
<p>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.</p>		<p>Please refer to the accompanying <i>Daylight Sunlight and Overshadowing Assessment</i> prepared by IES Consulting Engineers. The assessment takes account of the trees to be retained to provide a conservative assessment. In summary the assessment concludes:</p> <p><i>"the proposed development performs well when compared to the recommendations in the BRE Guide 3rd Edition and BS EN 17037-2018+A1-2021 National Annex. With regards to the existing properties there is a negligible impact when considering sunlight and daylight as a result of the proposed development and the proposed development itself performs very well with the same regard."</i></p> <p>We note the proposed scheme is compliant with BSEN Standards, including with respect to daylight/sunlight to existing Phase 1 blocks.</p>



<p>Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.</p>		<p>Please refer to the accompanying <i>Daylight, Sunlight and Overshadowing Assessment</i> prepared by IES. The proposed development will not result in any significant loss of daylight or sunlight received by the existing neighbouring properties, as only a small number of windows are affected with the proposed development in place, with 94% of tested receptors achieving compliance with BRE Guidelines (the accompanying <i>Daylight, Sunlight and Overshadowing Assessment</i> refers). We note the proposed scheme is compliant with BSEN Standards, including with respect to daylight/sunlight to existing Phase 1 blocks.</p> <p>Moreover, the proposed development will provide for public open space which is larger than the area required under the Development Plan and public amenities (community use and childcare facility), which will facilitate public access to this site which has heretofore always been in private ownership.</p> <p>Furthermore, the <i>Design Statement</i> prepared by OMP Architects explains how the scheme avoids overlooking and overbearing impacts.</p>
<p>Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</p>		<p>Please refer to the accompanying <i>Report on the Architectural/Historical Significance</i> prepared by Slattery Conservation Architects, in summary it is considered that the '<i>proposed development will enhance the Protected Structures within the site</i>'.</p>
<p>County Specific Criteria</p>		
<p>Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.</p>	<p>An urban design study and visual impact assessment study should be submitted and should address where appropriate views from the sea and/or piers.</p>	<p>Please refer to the accompanying and <i>Design Statement</i> prepared by OMP Architects.</p> <p>The site is located away from the coast and does not impede any of preserved/protected views.</p>



<p>Having regard to the high-quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.</p>	<p>An urban design study and visual impact assessment study should be submitted.</p>	<p>Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects. The site is not located within the mountain foothill landscape and no associated impact will arise.</p>
<p>Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning stage).</p>		<p>The Planning Authority did not request any specific additional requirements at S247 Stage. Additional information requested within the LRD Opinion issued by DLRCC subsequent to the S32B Meeting has been provided as part of this application. Refer to the Response to LRD Opinion prepared by TPA for further information.</p>
<p>Specific assessments such as assessment of microclimatic impacts such as down draft.</p>		<p>A Microclimate Assessment has not been prepared in respect of the proposed development, given the extent of the blocks and the proposed layout of the site.</p>
<p>Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</p>		<p>The impact of the proposed development on birds and bats has been assessed in the Ecological Impact Assessment prepared by Altemar accompanying this application. The Ecological Impact Assessment states that the proposed development would not be expected to represent a significant collision risk to wintering birds.</p> <p>The impact of artificial lighting on bats at the Site has been assessed in the EclA and public lighting plan accompanying this application. We refer to the Ecological Impact Assessment Report for further details.</p>
<p>Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</p>		<p>The proposed development is not anticipated to have any impact on telecommunication channels or microwave links due to its location and the heights proposed which range from 2 to 8 storeys.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>		<p>The application site is not located in proximity to any airports or airfields and the proposed development is of a similar scale to that previously permitted on the adjoining Phase 1 lands and impact of air navigation was not identified as an issue previously. The tallest proposed building is 7 storeys over podium, which is not high enough to impact on safe air navigation.</p>



<p>Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</p>		<p>An AA Screening is provided with this Submission, this identifies mitigation measures in order to avoid adverse impacts on Natura 2000 sites. An EcIA has also been prepared in respect of the proposed development, as well as an EIA Screening Report.</p>
<p>Additional criteria for larger redevelopment sites with taller buildings.</p>		<p>The proposed development of the site has been comprehensively considered through the proposed design.</p> <p>The design of the scheme has regard to the Protected Structures and mature landscaping.</p>
<p>Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.</p>		<p>The proposed development provides for new public open spaces in this previously private residential site, which will result in new destination spaces in the locality.</p> <p>The scheme has sought to preserve the character of the existing protected structures through their re-use, ensuring minimal interventions and uses which respect their character.</p> <p>Please refer to the accompanying and <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects which demonstrates how the scale, massing and form of the proposals positively contribute to placemaking and are sensitive to the scale of adjoining development.</p>
<p>For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.</p>		<p>Whilst the subject site is large at 2.54 ha in area, it is a constrained site due to the need to preserve trees where possible and the need to retain Cedar Mount House (Protected Structure) and the associated historic buildings.</p> <p>The enclosed <i>Daylight Sunlight and Overshadowing Assessment</i> prepared by IES demonstrates that the scheme largely meets the BRE targets for sunlight and daylight and where the worst case receptors (across the lowest 3 Levels of accommodation) were assessed against the emerging new standards (in this case EN 17037:2018: <i>Daylighting in Buildings</i> which has been published with a British annex BS EN 17037:2018, which includes further detail on the analysis criteria. We note the proposed scheme is compliant with BSEN Standards, including with respect</p>



		to daylight/sunlight to existing Phase 1 blocks.
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The proposed new development ranges between 2 and 8 storeys in height. In our opinion, allowing for the location of the site, quality of the design and the supporting assessments, the maximum height proposed of 8 storeys is permissible at the site.

We refer to the enclosed *Planning Report*, prepared by Tom Phillips + Associates; *Photomontages* prepared by Model Works; *Heritage Impact Assessment* prepared by Slattery Conservation; *Design Statement* and *Response to LRD Opinion* prepared by OMP Architecture; and the *Daylight Sunlight and Overshadowing Assessment* prepared by IES.

In our opinion, the proposed design strategy, and importantly, the building height strategy, responds to the immediate setting of the Protected Structure through separation distances and reduction in height. Similarly, the proposed building height strategy has been designed to mitigate significant adverse impact upon neighbouring amenity, with the height tapering from 8 storeys to 2 and 3 storeys (including setbacks) towards the boundaries of the site where the development is closer to existing residential dwellings.

5.5 Residential Development Standards

Throughout Chapter 12 the *Development Plan*, the development management standards for residential developments are outlined.

The enclosed *Housing Quality Assessment* (2 No. – Houses and Apartments), prepared by OMP Architects, demonstrates compliance with the relevant standards both for houses and apartments. Accordingly, the following items are enclosed –

- All habitable rooms within new residential units (and existing phase 1 units) have access to appropriate levels of natural / daylight and ventilation. A *Sunlight, Daylight and Shadow Impact Assessment* has been prepared by IES and is enclosed.
- Road and footpath requirements are noted and have been incorporated into the proposed design accordingly.
- An *Operational Waste Management Plan*, prepared by AWN has been prepared and is enclosed.
- A *Lighting Report* prepared by Saber Consulting Engineers is enclosed.

5.6 Dual Aspect in Apartments

Section 12.3.5.1 of the *Development Plan* notes that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

We note that 69% of the apartments are dual aspect. Accordingly, the proposed development complies with this Development Plan requirement.

5.7 Separation Distances

Section 12.3.5.2 refers to separation distances.

“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.

A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed 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. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development of circa 22 metres, is generally required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed 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. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.”

A *Sunlight, Daylight and Shadow Impact Assessment* has been prepared by IES which

demonstrates the majority (94%) of apartments meet the relevant targets. The apartments meet or exceed this requirement, where the units are less than 22m apart it is one face of a corner unit, which has a second facade with at least a 22m separation distance to the next building. Therefore, an adequate level of privacy is provided.

5.8 Internal and External Storage

Table 12.3 of the Plan outlines the Minimum Storage Space Requirements for residential developments. An extract of this is provided below

Minimum Requirements	
One Bedroom	3 sq.m.
Two Bedroom (3 person)	5 sq. m.
Two Bedroom (4 person)	6 sq. m.
Three Bedroom	9 sq.m.

Figure 5.3: the Minimum Storage Space Requirements. (Source: *Dún Laoghaire Rathdown County Development Plan 2022- 2028.*)

In addition, the following requirements are noted;

- *Storage should be additional to kitchen presses and bedroom furniture.*
- *Hot press/boiler space will not count as general storage.*
- *No individual storage room should exceed 3.5 sq.m. and shall be provided within the apartment unit.*
- *Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.*

Details of appropriate storage provided as part of the proposed unit layouts have been prepared and are outlined in the enclosed drawing pack and associated Housing Quality Assessment, prepared by OMP Architects. The scheme is compliant in this regard.

5.9 Dwelling Size and Mix

The proposed apartment unit mix for the 146 No. apartments complies with the *Sustainable Urban Housing Design Standards for New Apartments, 2023.*

Development Plan Table 12.1: Apartment Mix Requirements requires that a minimum of 20% of apartments in schemes of 50+ Units in built up areas must be 3+ bed units.

Area	Threshold	Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
New Residential Community (See figure 2.9 Core Strategy Map)	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units and with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Lands within SUFP	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

Figure 5.4: Table 12.1 of the Development Plan, Apartment Mix Requirements. (Source: Dún Laoghaire-Rathdown County Development Plan 2022-2028.)

Unit Type	Number	Percentage of Total Units
1 bed apartment	35	24%
2 bed apartment	81	55%
3 bed duplex apartments	27	19%
3 bed apartment	3	2%
Total	146 No.	100%

Table 5.5 Proposed Unit Mix – Apartment and Duplex Units

We submit that this unit mix accords in full with the requirements the *Development Plan* and ensures that the Planning Authority can consider this development on its merits.

In addition, Section 12.3.3 of the Development Plan requires that applications received in both new residential communities and within the residual built up area shall include:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
 - *Are designed and located having regard to the needs of older people and/or persons with a disability.*
 - *Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.*
- *A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.*
- *No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types.”*

In accordance with the Development Plan, a variety of dwelling unit types and sizes are proposed as part of the scheme, which will be suitable for a variety of household types. The

scheme provides 20% 3+ bed units through both apartment and house units. In addition, we note that the proposed floor plans, prepared by OMP Architects, demonstrate that the units are designed in accordance with Part M of the Building Regulations and the needs of older people and/or persons with a disability are met. Some 3.1% of the apartment units consist of 2- bed 3-person units, which is consistent with the Development Plan.

5.10 Residential Density

The Development Plan states that site densities should be determined with reference to the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009)*, as outlined in Section 12.3.3.2:

“In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines documents:

- *‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009).*
- *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).”*

The proposed development will have a density of 62 units per hectare (net density of 103.3 units per hectare and net density across entire Knockrabo lands on 65 units per hectare). The locational characteristics of the site in the context of residential density is further discussed in relation to national guidelines and Policy RES5 in Section 3.1, 3.3, 3.5, 3.11 of the Statement of Consistency.

We contend that this is appropriate for the subject site, having regard to National Planning Framework, which promotes higher residential densities at well located, serviced urban locations.

5.11 Refuse Storage

Section 12.3.4.7 of the Plan requires that adequate refuse areas are provided:

“Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. (See also Appendix 6).”

Waste storage areas to cater for segregated waste streams are provided within each apartment block, the proposed houses include refuse storage to store bins.

Please refer to the *Operational Waste Management Plan* prepared by AWN.

5.12 Minimum Apartment Floor Areas and Additional Apartment Design Requirements

All apartment developments shall accord with or exceed the minimum floor areas indicated in the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*, (2018), as set out in the Table 12.4 of the *Development Plan*. In this regard, the areas listed are minimum standards and should not be taken as the norm for all developments; higher floor areas will be encouraged throughout the County.

“In order to safeguard standards, the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed, by a minimum of 10% (excluding studios).”*

“Ground level apartment floor to ceiling heights shall be a minimum of 2.7 metres and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.

A maximum of 12 apartments per floor per core may be provided in apartment schemes*

** Not applicable to BTR development in accordance with SPPR 8.”*

Some 80% of the apartments exceed the apartment size standard by at least 10%. Apartment floor areas and associated standards are provided for each unit in detail in the enclosed Housing Quality Assessment prepared by OMP Architects.

5.13 Car Parking Standards

Car parking requirements are set out in Section 12.4 and Table 12.5 of the *Development Plan*. The subject site intersects Parking Zones 2 and 3.

Land Use		Zone 1 MTC Areas and Blackrock	Zone 2 Near Public Transport	Zone 3 Remainder of County (non-rural)	Zone 4 Rural
Houses:	Criterion	Maximum	Standard	Standard	Standard
House 1 bed	unit	1	1	1	Case by case
House 2 bed	unit	1	1	1	Case by case
House 3 bed or more	unit	1	2	2	Case by case
Apartments and Sheltered Housing:					
Apt 1 bed	unit	1	1	1*	Case by Case
Apt 2 bed	unit	1	1	1*	Case by Case
Apt 3 bed +	unit	1	2	2*	Case by Case
Education:	Criterion	Maximum	Maximum	Maximum	Maximum
Childcare	GFA (including set down)	1 per 80	1 per 60	1 per 40	1 per 40
Leisure:	Criterion	Maximum	Maximum	Maximum	Maximum
Restaurant, Café, Bar, Lounge > 100sqm	GFA	1 per 100	1 per 50	1 per 30	1 per 25

Figure 5.6: Car Parking Zones and Standards. (Source: *Dún Laoghaire Rathdown County Development Plan 2022- 2028*.)

Based on the above standards, using the maximum provision up to 199 No. car parking spaces would be required to serve the proposed development.

Some 130 No. car parking spaces are provided throughout the scheme, including 13 No. visitor parking spaces.

Section 12.4.5.2 of the *Development Plan* note deviations from standards are acceptable in some circumstances:

- *“Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Particular nature, scale and characteristics of the proposed development.”*

The Plan further states that ‘*Any surface carparking should be suitably integrated into the site with soft landscaping proposals and have regard to SuDS*’.

Section 12.4.5.7 of the *Plan* notes:

“Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development.”

In addition, dimension of parking and loading bays are noted within the Plan.

The proposed development provides 117 No. residential car parking spaces, at a ratio of 0.74 spaces per unit. Having regard to the proximity to high quality public transport, mobility management measures and management of the development, this ratio results in an appropriate level of provision commensurate with precedents in the County. Moreover, the proposed quantum of car parking provision is fully compliant with the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*.

Dimensions of the parking bays and location of parking bays for persons with disabilities have been designed using national standards and best practice.

5.14 Bicycle Parking Standards

The importance of bicycle parking is outlined in Section 12.4.6, which notes the requirement for the provision of bicycle parking to accord with ‘*Standards for Cycle Parking and Associated Cycling Facilities for New Developments*’ (2018) or any subsequent review of these standards, as published by Dún Laoghaire-Rathdown County Council. The Plan notes that within zones 1 and 2, the minimum standards set out in this policy document should be exceeded.

The Plan outlines the following considerations for bicycle parking within residential developments (of 5 units or more) (Section 12.4.6.2):

- *“Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of oversized formats (cargo bikes etc)?*

- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?”*

Secure long-term cycle parking is required for a development of this scale, and this cycle parking must be covered and ‘conveniently located within 50 metres of the destination and located near building access points where possible’. There is also a requirement for new larger developments to provide cycle route links to the existing cycle network, alongside internal cycle permeability.

Section 12.4.6.1 of the *Plan* requires “accessible and secure cycle parking, to cater for all types of cycles and for cyclists of all ages and abilities, is provided within new developments.”

For residential developments of this scale, the *Plan* states that a Cycle Audit must be conducted, and that it must refer to the County’s Cycle Parking Standards document.

The proposed development includes cycle parking facilities across the site, consistent with the Dun Laoghaire Rathdown County Council *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018)*. Cycle parking is provided within secure enclosures and near to entrances to buildings. Section 3.4 of the Housing Quality Audit prepared by OMP Architects provides further detail. Table 5.6 details required quantum of cycle parking provision under the *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018)*. We note the proposed cycle parking provision exceeds the requirements of these standards. Refer Schedule of Areas/Accommodation prepared by OMP for full schedule of proposed cycle parking numbers.

	Standards for Cycle Parking (long stay)	Standards for Cycle Parking (short stay)
Apartments	1 per 1 unit = 146 No.	1 per 5 units = 32 No.
House (2 bed)	1 per 1 unit = 1 No.	1 per 5 units = 0 No. 2 No. spaces applied as minimum required number
House (3= bed)	1 per 1 unit = 11 No.	1 per 5 units = 2 No. units
Childcare Service	1 per 10 children (approx. 80 No.) = 8 No.	1 per 5 staff (c.18 staff) = 4 No.
Institutions, Community Centres , Library, Museum, Art Gallery	1 per 100m2 GFA = 2 No.	1 per 5 staff = 0 (No staff required/proposed). 2 No. spaces applied as minimum required number
Total	168 No.	42 No.

Table 5.6: Required quantum of cycle parking provision under the *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018)*. (Source: OMP Schedule of Areas and *Standards for Cycle Parking and associated Cycling Facilities for New Developments (2018)*, table generated by TPA, 2024).

5.15 Motor Cycle Parking Standards

It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.

Some 9 No. motorcycle spaces are provided within the scheme. The dimensions of these spaces accord with relevant standards.

5.16 EV Parking Facilities

Section 12.4.11 of the *Development Plan* relates to the provision of Electric Vehicle charging points.

The Development Plan requires that residential multi-unit developments require a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.

For new dwellings with in-curtilage car parking, the installation of appropriate infrastructure to enable installation of a recharging point for EVs at a later stage is required.

The proposed development complies with the requirements relating to EV Parking Facilities. All proposed spaces will be fully ducted. Refer to Traffic and Transport Assessment prepared by WM for further information.

5.17 Emergency Access

In some circumstances large-scale developments, which could result in a significant level of peak and/ or off-peak travel, shall provide for duplicate access or other means approved by the Planning Authority for emergency use/access. This shall also allow access for pedestrians and cyclists. The Councils Transportation Section will ascertain whether an additional access is required. This will be dealt with on a case-by-case basis, although we note that this has not been raised through the pre-planning process.

5.18 Landscape Design Rationale

Section 12.8.1 of the *Development Plan* outlines the requirement for inclusion of a Landscape Design Rationale Report to be prepared by a qualified Landscape Architect or suitably qualified Landscape Professional, for the consideration of the Parks and Landscape Services Department.

The landscape design rationale should also address the following:

- Ecosystems services and carbon capture approach.
- Urban Greening.
- Biodiversity including pollinator friendly approach.
- Sustainable Drainage Systems.
- Maintenance without the use of chemical.
- Nature Based Play.

Such proposals shall include a scaled Landscape Plan(s) including:

- Cross-sections, where applicable, indicating the layout and hard and soft treatments of all boundaries, features, external areas, and green spaces.
- Specifications for materials, workmanship, and maintenance, together with proposed design details.
- Hard landscape details are to include, where applicable, any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features.
- Soft landscape details are to include, detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, and spacings.
- A Landscape Plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and a defects liability clause.
- Regard should also be had to Policy Objective OSR14: Play Facilities and Nature Based Play.

A *Design Rationale Report* has been prepared by DFLA, which details how the proposed development will accord with the above principles. In addition, the enclosed landscape masterplan has been developed in accordance with the above requirements in terms of drawing detail requirements and regard to policies relating to play facilities and nature-based play.

5.19 Public Open Space

Section 12.8.3 outlines the public open space requirements for residential developments, as shown below.

Location:	Public Open Space Standards (minimum):
Residential Development in new residential communities as shown in the Core strategy – figure 2.9.	15% (of site area)
Residential Development in the existing built up area.	15% (of site area)
Institutional and Redevelopment of SNI use	25% (of site area)

Figure 5.7: Public Open Space Requirements for residential developments. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028.*)

The proposed development provides 30.6% of the application area as ‘public open space’, exceeding the minimum open space requirement of 15%.

As a result, the proposed development maintains the open character of the lands, together with the incorporation of the distinct, mature and characterful landscape features such as mature trees. The proposed public open space has been designed to protect the landscape character of the site whilst ensuring the provision of large, accessible and usable areas of open space.

The proposed development provides open space of exceptional quality and unlocks a significant quantum of urban greenery that is currently inaccessible to the public. It is considered that the proposed quantum of open space provided by the development is acceptable.

5.20 Private and Communal Open

Private Open Space requirements for apartments, as extracted from Section 12.8.3.3 of the *Development Plan*, are shown below.

Type/No. of bedrooms	Minimum square metres
Studio	4 sq. m.
One	5 sq. m.
Two (3 persons)	6 sq. m.
Two (4 persons)	7 sq. m.
Three	9 sq. m.
Four +	12 sq. m.

Figure 5.8: Balconies/Winter Gardens: Minimum Private Open Space Standards for Apartment Developments. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028*.)

Further to this, Section 12.8.7 of the *Plan* notes the following in relation to private open space:

“In all instances, private open space should not be unduly overshadowed and where there is the potential for the proposed development to overshadow or overlook existing/future development adjoining the site, minimum separation distances to boundaries should be increased.”

Communal Open Spaces for apartments, as per Section 12.8.8.3.2 of the *Development Plan*, are shown below.

Unit Type	Minimum Area per Unit
Studio	4 sq. m
One Bed	5 sq. m
Two bedrooms (3 bed)	6 sq. m
Two bedrooms (4 bed)	7 sq. m
Three bedrooms	9 sq. m
Four +	12 sq. m.

Figure 5.9: Communal Open Space Standards. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028*.)

The Plan further states that open space provision in residential schemes is required to accord to Section 28 Guidelines of the *‘Sustainable Residential Development in Urban Areas’* (2009) and *‘Sustainable Urban Housing, Design Standards for New Apartments’* (2018).

Section 12.8.3.2 of the *Plan* notes that communal open space should be for the exclusive use of the residents and should be an ‘*accessible, secure, and usable outdoor space*’.

The Housing Quality Assessment, prepared by OMP Architects details the provision of private open space. All apartments are provided with private open space. The communal open space requirement amounts to 982 sq m. The communal open space provided in the scheme is 1323 sq m, some 341 sq m in excess of the requirement. This combined with the quality of the open space and quality of the landscape results in an appropriate quantum of amenity space for residents of the scheme.

5.21 Green Roofs/Blue Roofs

Applications for developments with a roof area ≥ 300 sq.m. shall provide Green Roofs in accordance with ‘*Dún Laoghaire – Rathdown County Council’s Green Roof Policy*’ (2020).

Green roofs have been considered and incorporated into the development proposals in accordance with Appendix 7.2 of the County Development Plan. Refer to the architectural pack prepared by OMP and the engineering pack prepared by Waterman Moylan for further information.

5.22 Existing Trees and Hedgerows

Section 12.8.11 outlines requirements in relation to existing trees and hedgerows, including:

“New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows.

New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan. Arboricultural Assessments carried out by an independent, qualified Arborist shall be submitted as part of planning applications for sites that contain trees or other significant vegetation. The assessment shall contain a tree survey, implications assessment and method statement.

The assessment of the site in question will inform the proposed layout, in relation to the retention of the maximum number of significant and good quality trees and hedgerows. Tree and hedgerow protection shall be carried out in accordance with BS 5837 (2012) ‘Trees in Relation to Design, Demolition and Construction – Recommendations’, or any subsequent document. All requirements for Arboricultural Assessment should be determined at pre- planning stage.”

And

“Where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planting or replacement trees and other plant material. This will be implemented by way of condition. A financial bond may be required to ensure protection of existing trees and hedgerows during and post construction.”

The proposal has been designed in accordance with Section 12.8.11 of the Development Plan, and we note a significant quantum of additional tree planting is proposed as part of the development. Open spaces have been designed to incorporate retained high quality existing mature trees.

Moreover, in respect of arboricultural considerations pertaining to retained and removed trees at the subject site, we note 84 No. trees have been previously removed, as permitted under DLRCC Reg. Ref. D17A/1124 (now expired - Refer to Appendix 3 of Arboricultural Assessment Report prepared by Arborist Associates for full schedule of trees which were assessed and removed as permitted under DLRCC Reg. Ref. D17A/1124). A further 29 No. existing trees are proposed to be removed as part of the current scheme, resulting in a total loss of 117 No. trees from the site over the permitted / proposed schemes. We note that the proposed development provides for the additional planting of 188 No. trees. In this regard, the proposed quantum of planting would result in a net addition of 71 No. trees, when compared to the previous site conditions prior to the grant of permission issued in respect of DLRCC Reg. Ref. D17A/1124.

Refer to the Arboricultural Assessment and drawings prepared by Arborist Associates, as well as the landscape pack prepared by DFLA for further information.

5.23 Play Facilities

Section 12.8.9 of the Development Plan details the requirements in respect of Play Facilities.

The extensive open space network proposed provides for a broad variety of play and play spaces, both formal and informal.

The *Design Rationale* prepared by DFLA details the scheme's proposed Play strategy.

5.24 Construction Management

Section 12.9 of the *Development Plan* outlines requirements in relation to air pollution, noise pollution and noise nuisance, noise, odour, and vibration generating uses, construction management plans, hours of construction and other construction considerations, such as interaction with site services and utilities. In addition, street lighting and lux level requirements are outlined.

A *Construction Management Plan* has been prepared by Waterman Moylan, which considers the potential impacts associated with the proposed development. A *Lighting Report* and associated drawings has been prepared by Saber Consulting Engineers.

5.25 Heritage Policies

Section 12.11 of the Plan outlines requirements in relation to heritage, protected structures and archaeology policies. The Plan notes that *Archaeological Impact Assessments and Method Statements* are required in certain instances.

The proposed development has had regard to the *Department of the Arts, Heritage and the Gaeltacht 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011)*.

A *Report on the Architectural/Historical Significance and Impact Report*, prepared by Slattery Conservation is enclosed, as well as an *Archaeological Assessment Report* prepared by IAC.

6.0 CONCLUSIONS

In summary, the proposed development will provide for, *inter alia*, 158 residential units (inclusive of apartments and houses), Childcare Facility, and community hub on underutilised lands, in an existing urban area in Dublin.

The development will make a strong contribution to housing delivery in the area by providing a significant quantum of residential units in a variety of housing types and sizes. The proposed non-residential uses and public open space will contribute to the area, providing a new destination, sensitively stitched into an existing community, for both future occupiers and existing residents. The proposed development also integrates with the Knockrabo Phase 1 lands.

We contend that the proposed development is in accordance with the following national and local policy documents:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*;
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
4. *Urban Design Manual: A Best Practice Guide (2009)*;
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2023)*;
6. *Quality Housing for Sustainable Communities (2007)*;
7. *Childcare Facilities – Guidelines for Planning Authorities (2001)*;
8. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
9. *Design Manual for Urban Roads and Streets (DMURS) (2019)*;
10. *The Planning System and Flood Risk Management (2009)*;
11. *Urban Development and Building Heights, Guidelines for Planning Authorities (2018)*
12. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
13. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*;
14. *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

In conclusion, it is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this substantial residential, serviced zoned site providing for an efficient use of lands, which are highly accessible and well served by public transport. The proposed development is also consistent with the proper planning and sustainable development of the area, and with all relevant National, Regional and Local Planning Policies and Guidelines. The proposed development will be a very attractive place, in close proximity to public transport and all of the amenities the local area has to offer.

Yours faithfully,



Stephen Barrett
Director
Tom Phillips + Associates