

September 2021

Planning Statement



**Lands at 'The Silver Granite' pub,
Kennelsfort Road Upper and Wheatfield Road,
Palmerstown, Dublin 20**

Hollyville Investments Ltd.



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1.0 Introduction

Downey Planning, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Planning Statement, on behalf of the applicant, Hollyville Investments Ltd. This report accompanies a planning application for a proposed mixed-use development on lands at The Silver Granite pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park), Palmerstown, Dublin 20.

The proposed development, as per the description contained within the statutory planning notices, provides for:

"Planning permission is sought by Hollyville Investments Ltd. for development on lands at The Silver Granite pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at The Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park), Palmerstown, Dublin 20. The development will consist of the demolition of the existing building on site and the construction of a 5-storey over partial basement, mixed-use development comprising a gastro pub/restaurant with off-licence, 2 no. retail units, associated bin stores, bike stores, 1 no. ESB sub-station, all at ground floor level; a small plant room at basement level; a total of 50 no. apartments (25 no. 1 beds and 25 no. 2 beds) on the upper floors, all provided with private balconies/terraces; communal roof gardens; car parking; motorcycle parking; bicycle parking; landscaping and upgrades to public realm including upgrades to existing pedestrian crossing on Kennelsfort Road Upper; and all associated engineering and site works necessary to facilitate the development."

The proposed development subject to this application relates to the re-development of 'The Silver Granite' site, and consists of the demolition of the existing building on site and the construction of a mixed-use development comprising a gastro pub/restaurant with off-licence, 2 no. retail units at ground floor level, and 50 no. apartments (25 no. 1 beds, and 25 no. 2 beds) provided with private balconies/terraces and communal roof gardens, on the floors above, in 1 no. 5-storey block over partial basement.

It is important to note that the scheme has been prepared by a multi-disciplinary design team and has been subject to pre-planning consultation with the Planning Authority. The scheme has evolved and improved as a result of the pre-planning consultation. This has ensured that a well-considered and appropriate form of development can be developed and integrated with the surrounding Palmerstown area.

It is considered that this mixed-use proposal offers an efficient use of land in close proximity of a QBC (c.800m) and Dublin City Centre. The lands subject to this application provide an ideal opportunity for both retail/commercial and residential development and are compatible with the existing built environment of the area. Given the land's strategic location within a highly accessible area, it is considered that the residential aspect of the proposed scheme provides for an appropriate density of units as well as compact growth, with the commercial aspect further supporting the sustainable development of the Palmerstown area.

This planning report sets out the planning rationale and justification for the proposed development and demonstrates how it accords with the proper planning and sustainable development of the area. This report should be read in conjunction with the plans, drawings and documentation submitted as part of the overall planning pack.

2.0 Site Location and Description

The application site is located within a District Centre in Palmerstown which is within the administrative area of South Dublin County Council. The subject lands are situated at the junction of Kennelsfort Road Upper and Wheatfield Road, and at the Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park).

The site is bound by Kennelsfort Road Upper and Palmerstown Shopping Centre, to the north by Wheatfield Road and residential dwellings, to the south by a petrol station, and by residential development to the east.

Access to the subject lands is via an existing vehicular entrance to the Silver Granite car park (within Palmerstown Shopping Centre car park) from Kennelsfort Road Upper, and via Kennelsfort Road Upper and Wheatfield Road bounding 'The Silver Granite' pub site.

The site consists primarily of the one-two storey building comprising 'The Silver Granite' pub with associated off-licence, and the bookmaker fronting Wheatfield Road. The building is surrounded by an apron of car parking which serves the existing businesses on site. It is proposed to demolish the existing structure on site in order to facilitate the proposed development.

The subject site enjoys excellent connectivity given its proximity to the Chapelizod Bypass, which provides access directly to the M50 and M4 motorways as well as to Dublin City Centre, and high frequency bus routes on Kennelsfort Road Upper. The Chapelizod Bypass also comprises a Quality Bus Corridor (QBC) which ensures that the lands are easily accessible by public transport. The subject site is c.800m from this QBC bus stop, i.e., Stop No. 2241 on R148 (old N4) Chapelizod Bypass. This QBC also forms part of a proposed BusConnects route which will reduce travel times to the city centre and other destinations.

Palmerstown is a large, western suburb of Dublin City located within the M50 ring, with vast areas of traditional housing. The immediate built environment surrounding the application site is characterised by a variety of land uses; such uses include a mixture of commercial, retail, residential, educational, recreational, etc. Liffey Valley Shopping Centre and The Retail Park Liffey Valley are located a short distance from the site and are recognised as one of the leading shopping destinations within Dublin. The surrounding area is also rich with high-quality amenity spaces including the expansive Waterstown Park and Liffey Valley.

As such, it is evident that the subject site is well served by a wide range of existing social and community facilities and is well located in terms of proximity to large retail centres and existing high-quality public transport. This level of infrastructure is considered sufficient to support the proposed development. Furthermore, the influx of population as a result of the proposed development will help sustain the long-term viability of this social infrastructure. The proposed development of this underutilised, brownfield site represents an important opportunity to deliver much needed housing

in South Dublin County and to meet the ever-increasing demand for housing in the Greater Dublin Area.

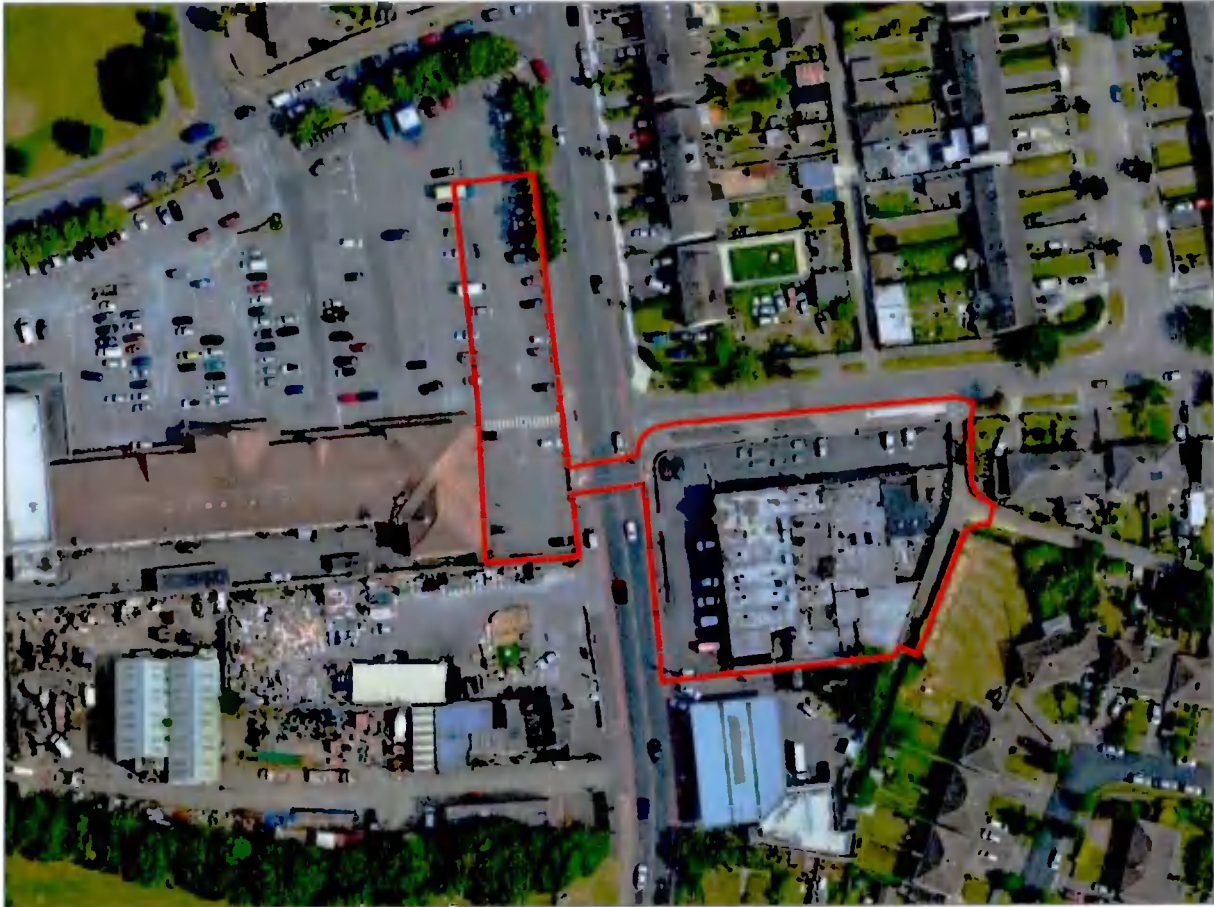


Fig. 1 – Site Location (approximate boundaries of application site outlined in red)

3.0 Planning History

Downey Planning have carried out an examination of the planning history via South Dublin County Council's planning portal which determined that there have been a number of planning applications made on the subject lands. The planning history is as follows:

- **Reg. Ref. S99A/0256** – On 5th August 1999, South Dublin County Council granted planning permission to Bunker Est. Ltd. for the change of the front entrance to existing off-licence, on lands at Palmerstown, Dublin 20.
- **Reg. Ref. SD04A/0612** – On 6th January 2005, South Dublin County Council granted planning permission to Bunker Estates Ltd for the erection of a betting office with staff area, toilets and permission to erect 3 no. satellite dishes, on lands at The Silver Granite, Kennelsfort Road, Palmerstown, Dublin 20.
- **Reg. Ref. SD10A/0393** – On 29th March 2011, South Dublin County Council granted planning permission to The Towey Group for the change of use of two number customer parking spaces to two number spaces for Taxis to ply for hire, including two number aluminium advertising signs (1 meter x 0.45 metres) on the inside of the boundary wall, on lands at The Silver Granite Pub, Kennelsfort Road, Palmerstown, Dublin 20.

Section 5 Referral

- **Reg. Ref. ED21/0010** –A Section 5 Application was lodged to South Dublin County Council under Reg. Ref. ED21/0010 on 11th February 2021 seeking a Declaration of Exemption on whether the following works are or are not exempted development: *20-inch container converted to a coffee/snack unit for retail - 14sq.m – located in car park of pub: the premises (Pub) is currently closed due to pandemic.* On 8th March 2021, South Dublin County Council issued a decision that the proposed development is NOT EXEMPT from the requirement to obtain planning permission and therefore would require planning permission.

Downey Planning understand that this represents the full extent of the planning history pertaining to the subject site.

4.0 Pre-Planning Consultation

Pre-Planning First Meeting

The first pre-planning meeting with the Planning Authority took place on 7th December 2018 in the offices of South Dublin County Council. This meeting was logged under South Dublin County Council Pre-Planning Ref. PP174/18.

Those in attendance from South Dublin County Council consisted of Siobhan Duff, Eugenia Thompson (Planning), Brian Harkin (Drainage), and Willie Purcell (Roads); with Frank Towey (Applicant Representative), Justin Halpin, Eva Bridgeman (Downey Planning & Architecture), attending on behalf of the design team and the applicant.

During this consultation meeting a variety of aspects concerning the proposal were discussed, including communal open spaces, residents' amenities, surface water/foul, attenuation (existing and proposed), setbacks, recessed bus lane at Kennelsfort Road Upper, public realm improvement works, etc. This meeting helped to inform the design of the proposed development.

Pre-Planning Second Meeting

A second pre-planning meeting with the Planning Authority took place on 16th February 2021 via MS Teams. This meeting was logged under South Dublin County Council Pre-Planning Ref. PP130/20.

Those in attendance from South Dublin County Council consisted of Tracy McGibbon, Evan Walsh (Planning), Brian Harkin, Ronan Toft, Graham Murphy (Water Services/Drainage), Aws Taki, Willie Purcell (Roads), and Fionnuala Collins (Parks); with Frank Towey (Applicant Representative), Greg Daly, Stephen Manning (GDCL Engineers), Eoin Reynolds (NRB Engineers), Eva Bridgeman, Sandy Williams, Paula Mota, Joe McCallion (Downey Planning & Architecture), attending on behalf of the design team and the applicant.

It is important to mention that this consultation took place two years after the first Pre-Planning meeting and thus a brief update of planning policy and a detailed view of the proposal were put forward. The relevant Departments issued their comments and requirements for the future application, including SuDS measures, roads and access arrangements, alongside public realm improvement including the upgrading of the existing pedestrian crossing on Kennelsfort Road Upper which was welcomed by the Council. This meeting helped to inform the design of the proposed

development which is now being submitted to the Planning Authority. The consultation resulted in the design team giving further due consideration to the design of the proposed development prior to the finalisation of the proposal subject to this planning application.

Part V Engagement

Part V of the Planning and Development Act, 2000 (as amended) applies to the proposed development. In order to reach an agreement regarding compliance with Section 96 of Part V of the Planning and Development Act, 2000 (as amended), Eva Bridgeman of Downey Planning liaised with Edel Dempsey of the Housing Department of South Dublin County Council regarding the proposed development. A validation letter from the Housing Department of South Dublin County Council is enclosed with this planning application. Thus, it is considered that the proposal meets the requirements of Part V of the Planning and Development Act, 2000 (as amended).

5.0 Proposed Development

The proposed development, as per the description contained within the statutory planning notices, provides for:

"Planning permission is sought by Hollyville Investments Ltd. for development on lands at The Silver Granite pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at The Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park), Palmerstown, Dublin 20. The development will consist of the demolition of the existing building on site and the construction of a 5-storey over partial basement, mixed-use development comprising a gastro pub/restaurant with off-licence, 2 no. retail units, associated bin stores, bike stores, 1 no. ESB sub-station, all at ground floor level; a small plant room at basement level; a total of 50 no. apartments (25 no. 1 beds and 25 no. 2 beds) on the upper floors, all provided with private balconies/terraces; communal roof gardens; car parking; motorcycle parking; bicycle parking; landscaping and upgrades to public realm including upgrades to existing pedestrian crossing on Kennelsfort Road Upper; and all associated engineering and site works necessary to facilitate the development."

The proposed development has been sensitively designed to provide for a high-quality mixed-use scheme that will introduce an attractive visual landmark at this strategic location in Palmerstown while at the same time being respectful and sensitive to the established character of the surrounding area.

The proposed development seeks to provide an active setback streetscape along Kennelsfort Road Upper and Wheatfield Road by providing a gastropub/restaurant and retail uses at ground floor level. The proposal also seeks to introduce a residential use on the site by providing 50 no. apartments on the upper floors, with 25 no. 1 beds and 25 no. 2 beds proposed in total.

All apartment units have been designed in accordance with the pertaining Development Plan standards and 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines complying with or exceeding the minimum standards by at least 10% as per the aforementioned Guidelines. The proposed apartments have been designed to maximise opportunities for dual aspect units, which make up 60% of the proposed units.

The apartment units within the proposed development have been provided with adequately sized balconies/terraces which have been designed in accordance with quantitative and qualitative standards and which have been provided with appropriate treatments to ensure privacy and security. Overall, it is considered that the quality of the facilities provided throughout the proposed development are appropriate and of a high-quality and therefore provide an enhanced standard of amenity for the future residents of the scheme. Please refer to the enclosed Schedule of Accommodation prepared by Downey Architecture which sets out the private and communal open space provided.

In term of open spaces, the proposed landscape design aims to create a high-quality urban landscape for residents and visitors to partake with; an attractive landscape for people to sit in and move through whilst enhancing the visual amenity of the area. The design approach incorporates appropriate elements of new tree planting, mixed ornamental planting and raised planters with seating. The communal open space terraces for the apartments afford residents the opportunity to sit out and enjoy these high-quality spaces, with play equipment also provided for children. Please refer to the plans and drawings prepared by Downey Landscape for further details in this regard.

Overall, the proposed development will form a distinctive new mixed-use development which is of a density and character that assimilates well to its location within walking distance of a public transport node, i.e., QBC bus corridor. The apartments are suitable for all family and age demographics and are designed such that there is adequate space and generously sized private open space available within the development.

All selected materials are of high-quality, low maintenance and durable, the variety of which adds interest to the development. The materials chosen for the proposed development are those which complement the surrounding area, thus creating a development rooted to its context. The elevational treatment has been a key consideration throughout the design process. The distinct composition of the proposed scheme alongside the chosen materials and external design would make a positive contribution to the area and surrounding environs.

Please refer to the plans, sections, and elevations drawings prepared by Downey Architecture for further details on the unit types and overall design. Please also refer to the Architectural/Urban Design Statement prepared by Downey Architecture.

6.0 Planning Context

6.1 Project Ireland 2040: National Planning Framework

The National Planning Framework is *"the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040"*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that, *"a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages"*. It is also stated that there will be an ongoing shift in population and jobs to the east and to the counties around Dublin in particular. The NPF will support the future growth and success of Dublin as Ireland's leading global city of scale,

by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.

According to the National Planning Framework, Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin's continued performance is critical to Ireland's competitiveness.

The NPF states that, *"the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future."*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *"prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure."*

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that, *"At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development."*

"The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village. This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly 'greenfield' development and requires a change in outlook."

The NPF has a number of national policy objectives which are relevant to this application, which include:

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

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

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

It is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban centres and close to public transport corridors. As such it is respectfully submitted that the proposed building height ranging from 4 storeys to 5 storeys is in line with Government guidance and evolving trends for sustainable residential developments in urban areas.

Downey Planning are of the considered opinion that the proposed apartment development is in line with the objectives of the National Planning Framework as it states that, *"to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities"*. The National Planning Framework also states that, *"this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector"*. The proposed development is located in a strategic location in close proximity to Dublin's City Centre. The National Planning Framework also states that, *"while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)"*. It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that, *"in many European countries it is normal to see 40-60% of households living in apartments."*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland's cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in Dublin. It is therefore considered that the provision of 50 no. new apartments, all with private open space and communal roof terraces, alongside the proposed gastro pub/restaurant with off-licence and the 2 no. retail units, on the subject site will assist in achieving the objectives of the National Planning Framework.

6.2 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

'Rebuilding Ireland, an Action Plan for Housing and Homelessness', provides a multi-stranded, action-oriented approach to achieving many of the Government's key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed

to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are: addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action 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 rental sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- *Addressing the unacceptable level of households, particularly families, in emergency accommodation;*
- *Moderating rental and purchase price inflation, particularly in urban areas;*
- *Addressing a growing affordability gap for many households wishing to purchase their own homes;*
- *Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty;*
- *Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,*
- *Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.*

The provision of 50 no. new apartments on the subject site will help the Government to achieve the objectives of the Housing Action Plan. Thus, it is submitted that the proposed development is consistent with the policy in this regard.

6.3 Housing for All: A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland's housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. Housing for All provides four pathways to achieving four overarching objectives:

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

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased

housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

It is submitted that provision of 50 no. residential units on the subject site will help the Government to achieve the objectives of the Housing for All Plan. Thus, it is submitted that the proposed development is consistent with this housing plan.

6.4 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

This document reviews and updates the Residential Density Guidelines (1999), and its aim is to assist both planning authorities and developers in meeting certain standards in the design of residential development. The main objective of the '*Sustainable Residential Development in Urban Areas Guidelines*' is to produce high-quality sustainable developments through providing:

- *Quality homes and neighbourhoods;*
- *Places where people actually want to live, to work and to raise families; and,*
- *Places that work – and will continue to work – and just for us, but for our children and for our children's children.*

The Guidelines state that sustainability is about the integration of schools, community facilities, employment, transport and amenities with the housing development process in a timely, cost-effective way.

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans and which should guide the preparation and assessment of planning applications for residential developments in urban areas. The Guidelines support higher residential densities on 'brownfield' sites, particularly for such sites close to public transport corridors, as it states that, "*In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops, and decreasing with distance away from such nodes*". The subject site can be considered a brownfield site and is within close proximity to the Lucan – City Centre QBC which is also designated as a proposed BusConnects route which will reduce travel times, as well as being located at two bus stops for Dublin Bus routes connecting the site to Dublin City Centre.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the '*Urban Design Manual – A Best Practice Guide*' and its 12 criteria, including: *Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy/Amenity, Parking, and Detailed Design*, of which Planning Authorities are recommended to assess planning applications. It is evident that the form, layout, and architectural and landscaping design of the proposed development have been informed by the development's place and time. Well-designed homes in the right locations are fundamental to building strong, sustainable communities. Such communities will ensure Ireland's continued success in attracting and generating investment and improving the quality of life for residents.

Downey Planning are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, giving full consideration to its neighbouring properties and will integrate successfully with its environs. The proposed development has had regard to the surrounding environment and carefully assesses the proposal in light of same. The development positively contributes to the character and identity of the surrounding neighbourhood. The proposed scheme is also considered to be of an appropriate density (106 units per hectare) which will help to support efficient public transport. Downey Planning are of the considered opinion that the scheme would be a positive addition to the surrounding built environment of Palmerstown and to the identity of the locality. Furthermore, it is considered that the proposed new apartments will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further detailed information on the proposed development's consistency with the 'Urban Design Manual', please refer to the Architectural/Urban Design Statement prepared by Downey Architecture.

6.5 Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)

The Government's Statement on Housing Policy '*Delivering Homes, Sustaining Communities*' 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 recognised 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 the provision of residential units and services in new housing developments. Best use of land is encouraged 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 a 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 an Architectural Design Statement and a Housing Quality Assessment (HQA) document prepared by Downey Architecture which demonstrate the consistency of the proposed development with the relevant standards in the '*Quality Housing for Sustainable Communities*' document and the South Dublin Development Plan 2016-2022.

6.6 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The '*Sustainable Urban Housing: Design Standards for New Apartments*' build on the content of the 2018 apartment guidance, much of which remains valid, particularly with regard to design quality

safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that, *"in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland's five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years."* It is also stated that it is *"critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures."*

The Guidelines also state that, *"aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *make better provision for building refurbishment and small-scale urban infill schemes;*
- *address the emerging 'build to rent' and 'shared accommodation' sectors; and,*
- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs."*

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines also state that, *"ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- *Young professionals and workers generally;*
- *Those families with no children;*
- *'Downsizers'; and,*
- *Older people, in both independent and assisted living settings."*

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard it is considered that the proposed development falls within *(1) Central and/or Accessible Urban Locations* as it meets the criteria for this location in that the site is within easy walking distance of a high frequency urban bus service, i.e., the Lucan – Dublin City Centre QBC is located within close proximity to the subject site. Furthermore, it is located directly on a Dublin Bus route connecting the site to Dublin City Centre. This type of location is also suitable for large scale and higher density development. Thus, it is considered that the subject site is suitable for a higher density apartment development.

The Guidelines also have specific planning policy requirements (SPPRS), which include:

Specific Planning Policy Requirement 1: *"Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments*

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

Specific Planning Policy Requirement 3: "Minimum Apartment Floor Areas:

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

It is considered that the proposed development complies with the standards mentioned above. The proposed development provides for a total of 50 no. units consisting of 25 no. 1 beds and 25 no. 2 beds. The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings and the detailed Housing Quality Assessment schedule prepared by Downey Architecture, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

The Guidelines also note the following with regard to aspect of units under Specific Planning Policy Requirement 4 which states:

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

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*

The development in this instance is located at a central/accessible location within close proximity of Dublin City Centre and which is well-served by public transport. In this regard, the minimum requirement for dual aspect units is 33%. The proposed development provides for 60% dual aspect units and therefore meets and exceeds the aforementioned guidelines.

In relation to bicycle and car parking requirements, the Guidelines state that it must be ensured that, *"new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time*

comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors". The proposed development has provided a total of 128 no. bicycle spaces in high quality, safe and accessible locations. This is considered to be acceptable and in accordance with the requirements of the Guidelines and the pertaining Development Plan standards.

As stated within the Guidelines, *"the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria"*. The proposed development is situated in a strategic highly accessible location in close proximity to a high frequency bus network, and as such the car parking provision can be minimised, substantially reduced or eliminated in certain circumstances. In this regard, the proposed development provides for 53 no. car parking spaces on site and within the adjoining car park which provides for an appropriate quantum to serve the proposed residential development and commercial components as part of this application. Please refer to the TTA and Preliminary Travel Plan prepared by NRB Consulting Engineers for further information in this regard.

6.7 Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018)

The *'Urban Development and Building Heights, Guidelines for Planning Authorities'* are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibility and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that, *"a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels."*

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines states, *"the rationale ... for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas"*. It continues, *"in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality."*

Additionally, Section 1.11 states, *“these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.”*

The proposed development is consistent with these objectives and given the physical and social infrastructure already in place can easily accommodate the proposed height of 5 storeys on the subject lands.

The Guidelines go on to state that, *“In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility”*. As such, the proposed development is considered to be in accordance with these guidelines given that the subject site is well served by public transport and enjoys excellent connectivity to Dublin City Centre as it is located to close proximity of a high frequency urban bus service, i.e. the Lucan – Dublin City Centre QBC and also is located directly on a Dublin Bus route to the city and surrounding areas.

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

SPPR1: *“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”*

The proposed development is situated at a strategic location within Dublin in close proximity of several transportation services which connect the site to Dublin City Centre, thus it is capable of supporting taller buildings and increased density. It is considered that the site is excellently served by public transport and is suitable for increased density and height.

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

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

- (A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and,*
- 2. The assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*
- Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."*

Section 3 of the Guidelines sets out development management principles and criteria that proposals for higher buildings are to be assessed against. The Development Management Principles are in accordance with and consistent with securing the objectives of the NPF and the South Dublin Development Plan. The Development Management Criteria are as follows:

1. At the scale of the relevant city/town:

- The subject site is well served by public transport, particularly Dublin Bus directly outside the site and it is also within short walking distance (i.e. within 800m) of the Lucan – City Centre QBC, which is also a proposed BusConnects route. The proposed BusConnects will further improve the public transportation offerings.
- There are no sensitive or protected external views in the vicinity of the site, which would be affected by the proposed development and the 4-5 storey taller building proposed.
- The proposed increase in height will help to create a strong urban edge at this corner site at the junction of Kennelsfort Road Upper and Wheatfield Road, as well as adding to the place-making design of the scheme.

2. At the scale of the district/neighbourhood/street:

- The proposal for the height will help to create added visual interest at the junction of Kennelsfort Road Upper and Wheatfield Road, which will be supported by the provision of improvements to the public realm accessible to the wider community and the improved connections to Palmerstown Shopping Centre.
- The increased height will help to create a stronger urban design response to what is generally considered to be an unresponsive area of urban design at this key corner site at the junction of Kennelsfort Road Upper and Wheatfield Road.
- It is respectfully considered that the proposal introduces a high-quality development at an underutilised site within an urban setting. The proposed development responds appropriately to the surrounding built context and respects adjoining residential amenity by stepping down to the east to four storeys towards the dwellings on Wheatfield Road, providing appropriate separation distances and through the introduction of screening measures for proposed open spaces such as balconies and communal terraces. Palmerstown is also experiencing change in its built context with the construction of the SHD scheme in the village (accessed via Kennelsfort Road Lower) now underway which will range in height from 3 – 8 storeys.
- The proposed design includes an appropriate palette of materials that are sensitive to the overall development and avoids the creation of monolithic design.

- The site is not in an area at risk from flooding and as such is appropriate for this form of development.

3. At the scale of the site/building:

- The design of the development avoids long and uninterrupted elevations, with a variation in the form and height of the building being a central element of the architectural design.
- The proposed development will provide appropriate levels of daylight and sunlight and will not give rise to adverse overshadowing, as confirmed in the report prepared by Digital Dimensions, which is included as part of the application.

4. Specific Assessment:

- The AA Screening confirms that the development will not result in a significant impact on any Natura 2000 sites.
- The proposed development provides for 50 apartments and retail and commercial uses on a site extending to 0.469ha and therefore is sub-threshold for the purposes of mandatory EIA.
- The proposed height of the development will not affect air navigation or result in any undue glare or impact on telecommunication measures.

In addition, the application contains sufficient reports, documentation, plans and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, Architectural/Urban Design Statement, Traffic and Transport Assessment, AA Screening, planning reports, daylight and shadow analysis, verified views, etc.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights and taller buildings are achievable. The proposed development at Palmerstown is well served by public transport and therefore can be expected to achieve higher density residential development. Furthermore, the existing lands at Palmerstown are brownfield lands that are zoned for development and are serviced with road and public transport infrastructure. Therefore, higher density residential development can be achieved on the lands in accordance with the aforementioned policy guidelines.

6.8 Design Manual for Urban Roads and Streets (DMURS)

The '*Design Manual for Urban Roads and Streets*' (DMURS) 2013, updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The transport documentation prepared by NRB Consulting Engineers provide further details in respect of the compliance of the proposed development with the provision of DMURS.

Please refer to the pertaining documents and drawings prepared by NRB Consulting Engineers for further information in this regard.

6.9 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

In conjunction with the NPF, the RSES predicts Dublin City and Suburbs to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal is the following;

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

Regional Policy Objective (RPO) 5.4 – *“Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*

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

The proposed development at Palmerstown is located within the Dublin Metropolitan Area on brownfield urban lands and in close proximity of a high frequency bus corridor, i.e. QBC, which offers direct connection to Dublin City Centre. The Dublin Metropolitan Area is targeted for increased development, particularly lands that are readily accessible by public transport and road infrastructure. It is considered that the proposed scheme comprising a high quality and higher density residential development consisting of 50 no. apartments will contribute in providing much needed additional housing units within the existing envelop of Dublin City and suburbs, and will assist in achieving the aforementioned objectives of the RSES.

It is submitted that the subject site is strategically located on a Dublin Bus route, within walking distance of a QBC from Lucan into Dublin City Centre, and a proposed BusConnects route. The proposed development will provide housing in the city in accordance with the above strategic objective. Therefore, it is considered that the proposed development is consistent with the objectives of the RSES.

6.10 Transport Strategy for the Greater Dublin Area 2016-2035

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is: *"To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods."*

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development in Palmerstown is located within walking distance of a QBC and directly on a bus route connecting the site to Dublin City Centre, with a proposed density of 106 units per hectare, and is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

7.0 South Dublin County Council Development Plan 2016-2022

The site lies within the functional area of South Dublin County Council, and therefore is affected by the policies and objectives of the South Dublin County Council Development Plan 2016-2022. The policies and objectives of the County Development Plan are underpinned by the following overarching considerations:

(a) Quality of Life, with an emphasis on key economic, environmental, social and cultural indicators;

(b) Prosperity, with an emphasis on contributing to a competitive business environment that supports economic development, job creation and prosperity for all;

(c) Sustainability, with an emphasis on making better use of key resources such as land, buildings, water, energy, waste and transport infrastructure;

(d) Health and Wellbeing, by facilitating active and healthy lifestyles with increased opportunities for walking, cycling and active sport and recreation;

(e) Social Inclusion, with an emphasis on creating socially and physically inclusive neighbourhoods, taking account of the recommendations of The National Disability Strategy Implementation Plan 2013-2015 and Inclusion Ireland's Changing Places campaign; and

(f) *Climate Change Adaptation, with increased emphasis on reducing climate change at a local level through settlement and travel patterns, energy use and protection of green infrastructure.*

7.1 Core Strategy & Settlement Strategy

The Core Strategy projects a likely need for 32,132 additional housing units in South Dublin County over the plan period. The table below provides the total housing capacity under the 2016-2022 County Development Plan for the Consolidation Areas within the Gateway which includes Palmerstown.

HIERARCHY	TOTAL LAND CAPACITY (HA)	TOTAL HOUSING CAPACITY (NO.S)	% TOTAL IN EACH SETTLEMENT	2011 POP	POTENTIAL POP (2011 & FORECAST 2022)	INFRASTRUCTURE COMMENT
Consolidation Areas within the Gateway						
Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Knocklyon, Firhouse/ Ballycullen and parts of Greenhills, Terenure and Rathfarnham	295	9,620	24%	89,752	95,854	No significant road, water supply or drainage constraints. Proposed high capacity transport projects (BRT) would increase capacity of zoned lands.

Table 1 – South Dublin County Housing Capacity for the Consolidation Area

In terms of phasing, planning prioritisation and infrastructure delivery, the Development Plan states that it is advised that, *“the continued consolidation of the established urban and suburban built form is a priority during the period 2016-2022. There is significant capacity for new housing on serviced lands to the east of the M50, south of the River Dodder and in the Metropolitan Consolidation Towns.”*

A key element of the overall Settlement Strategy is to promote the consolidation and sustainable intensification of the existing urban/suburban built form to the east of the M50 thereby maximising efficiencies from established physical and social infrastructure. It is noted that Consolidation Areas within the Gateway such as Palmerstown are suburban areas with established identities and communities with distinct heritage and character. It is recognised that there are opportunities in these areas to strengthen and consolidate through infill and brownfield development.

The Development Plan recognises that, *“these areas have a range of urban services such as transport, retail, medical and community facilities. Recent Census data identifies an aging population and stagnant or falling populations, which presents a serious risk for the viability of services and facilities into the future.”*

The Development Plan also makes particular reference to the re-use of brownfield sites for housing developments and lands which are served by high quality public transport. The Plan recognises that, *“in a predominantly urban county such as South Dublin, new housing will be delivered in established areas through sustainable intensification, infill development and the re-use of brownfield lands while*

respecting the amenity value of existing public open spaces. Expansion will focus on the creation of sustainable new communities at locations that can be served by high quality public transport. This approach will make the best use of the County's land and infrastructure resources by ensuring that in the first instance, new development is linked to existing transport services, physical and social infrastructure and amenities."

In this regard, the proposed development will provide for a high-quality mixed-use development on what is an underutilised brownfield site in a highly accessible location which is well served by public transport and within the M50 ring. The proposed development has a residential density of 106 units per hectare, on zoned, serviced lands which are located within a district centre in Palmerstown. The site contains an existing bus stop (No. 2204) with Bus Stop No. 2208 situated across the road, connecting the proposal to Dublin City Centre. The lands are also located within 800m of the Lucan – City Centre QBC, which is also a proposed BusConnects route. It is therefore considered that the proposed development is consistent with the vision, strategy and objectives outlined in the Core Strategy and Settlement Strategy for South Dublin County and Palmerstown.

7.2 Land Use Zoning & Surrounding Uses

Under the current South Dublin County Council Development Plan 2016-2022, the subject site is zoned 'Objective 'DC', which seeks: "To protect, improve and provide for the future development of District Centres."

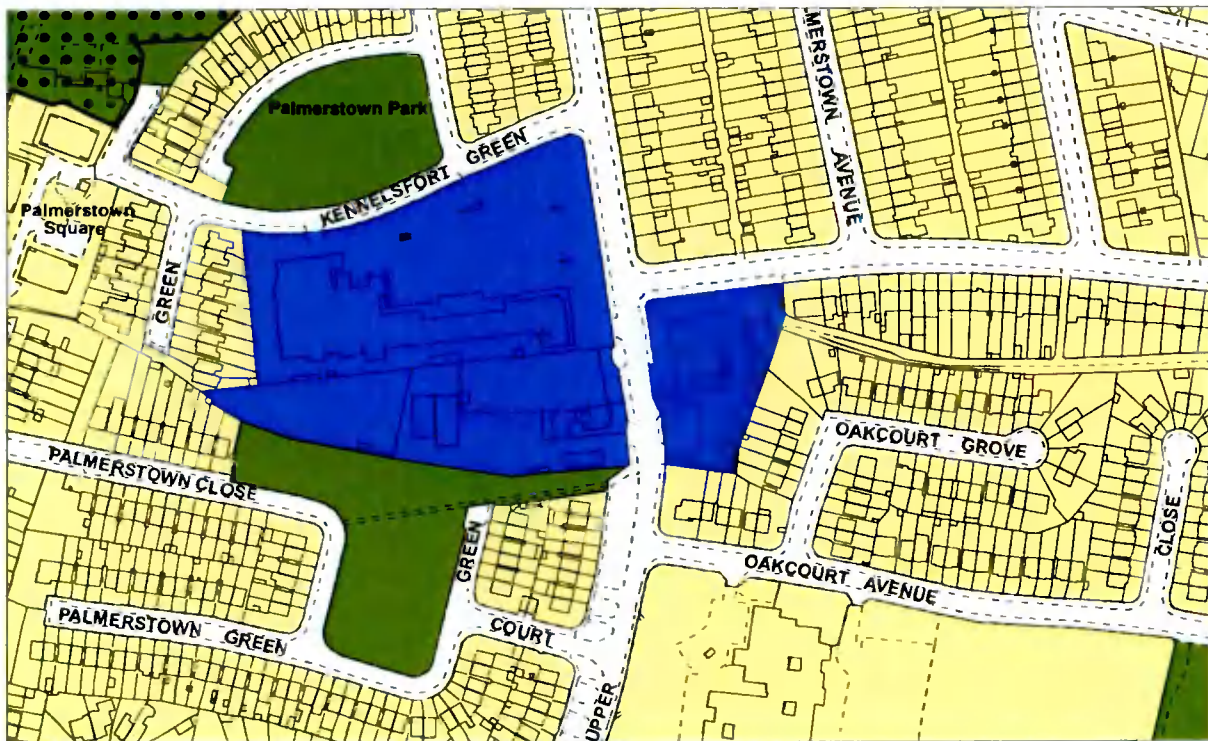


Fig. 2 – 'DC' Land Use Zoning Designation

The following relevant use classes are related to this zoning objective:

USE CLASSES RELATED TO ZONING OBJECTIVE	
Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car park, Childcare Facilities, Community Centre, Cultural use, Doctor/Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Home Based Economic Activities, Housing for Older People, Industry-Light, Live-Work Units, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m ¹ , <u>Off-Licence</u> , Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, <u>Public House</u> , Public Services, Recreational Facility, Recycling Facility, Residential, Residential Institution, Restaurant/Café, Retail Warehouse, Retirement Home, Shop-Local, <u>Shop-Neighbourhood</u> , Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.
Open for Consideration	Allotments, Conference Centre, Crematorium, Embassy, Hotel/Hostel, Motor Sales Outlet, Nightclub, Science and Technology Based Enterprise, Service Garage, Shop-Major Sales Outlet, Traveller Accommodation, Warehousing, Wholesale Outlet.
Not Permitted	Abattoir, Aerodrome/Airfield, Agriculture, Boarding Kennels, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Fuel Depot, Heavy Vehicle Park, Hospital, Industry-Extractive, Industry-General, Industry-Special, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Transport Depot, Wind Farm.

Table 2 – Use Classes of Land-Use Zoning (SDCC Development Plan 2016-2022)

The proposed residential use and commercial uses are permitted in principle. In relation to District Centres, the Development Plan states that:

“These centres are generally purpose-built shopping centres with a primary retail function, ancillary land uses and surface car parking. The role of the centres in the urban hierarchy is to provide a district focal point for the community. The scale and function of district centres vary and there are opportunities in many centres for revitalisation and the provision of ancillary community, recreational, medical and other uses at an appropriate district level scale in parallel with the retail function.”

“District Centres are secondary urban centres that serve the environs of the Metropolitan Consolidation Towns of Tallaght, Clondalkin and Lucan and the Consolidation Area within the Gateway associated with Dublin City”.

URBAN CENTRES (UC) Policy 4 District Centres

It is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in District Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a district level catchment, subject to the protection of the residential amenities of the surrounding area.

UC4 Objective 1: *"To support the revitalisation of district centres, including maximising the use of upper floors of existing buildings, with due regard to the quality of urban design, integration, linkage, accessibility and protection of residential amenity."*

UC4 Objective 2: *"To support the development of small scale community facilities within accessible district centres."*

UC4 Objective 3: *"To encourage a broad range of facilities and services that are appropriate to serve a district catchment and fulfil a district function, as a focus for both community infrastructure and public transport."*

UC4 Objective 4: *"To improve walking and cycling infrastructure within the local catchment of the County's district centres."*

Town, village, district and local centres are the primary focus of community, economic, and cultural activity throughout the County. These centres are of vital importance to the County's image and identity and development in these Centres should incorporate the highest standards of design.

The design team have assessed the proposed development in terms of the existing infrastructure within the area. It is the injection of a new population into this area as a result of the delivery of apartments that will provide additional footfall and essentially strengthen the consumer base of this district centre. This is in accordance with the Development Plan which recognises that, *"these areas have a range of urban services such as transport, retail, medical and community facilities. Recent Census data identifies an aging population and stagnant or falling populations, which presents a serious risk for the viability of services and facilities into the future."* (County Development Plan: pg.20)

The proposed commercial uses at ground floor level of the scheme, including the continuation of the current use on site albeit in a new format (gastropub/restaurant with off-licence) will further strengthen the commercial offering in this district centre.

In light of the above, it is submitted that the proposed development will create a new, sustainable community which will integrate with Palmerstown and the surrounding land uses, and will revitalise the area through the introduction of 50 no. high-quality designed residential units with complementary commercial uses for the enjoyment of the residents of the proposed development and the wider Palmerstown community. This proposed development seeks to provide an injection of population into the area to ensure the viability and vitality of services and facilities within Palmerstown into the future. It is considered that the proposed development is consistent with the objectives of the zoning designation and the objectives of the South Dublin County Council Development Plan 2016-2022.

7.3 Housing Supply, Design & Mix

The Housing Strategy assesses the mix of house types and tenures that are required to serve the needs of the County's forecast population and sets out a range of measures to address housing segregation and provide social housing including the reservation of lands for social housing.

HOUSING (H) Policy 1 Housing Strategy

H1 Objective 1: *"To significantly increase the stock of social housing in the direct control of South Dublin County Council in order to meet the long-term housing needs of those households on the local authority housing list."*

H1 Objective 2: *"To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted)."*

H1 Objective 4: *"To promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing in a balanced way in all Local Electoral Areas of the County."*

It is considered that the proposed development is consistent with above objectives as it is proposed to provide for social and affordable housing on site as part of the overall scheme. A validation letter from SDCC Housing Department also accompanies the application.

HOUSING (H) Policy 2 Supply of Housing

"It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County."

H2 Objective 1: *"To ensure that sufficient zoned land, which could be serviced by sufficient public transport and road capacity, continues to be available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing."*

The proposed development will provide 50 no. apartment units on appropriately zoned lands which is served by high-quality public transportation including walking distance of a QBC, and which is located close to the M50 and associated road networks.

In terms of sustainable communities and urban design in residential developments, the Development Plan states that:

HOUSING (H) Policy 6 Sustainable Communities

"It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities."

HOUSING (H) Policy 7 Urban Design in Residential Developments

"It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design"

of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended)."

H7 Objective 1: *"To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009)."*

H7 Objective 2: *"To ensure that residential development provides an integrated and balanced approach to movement, place-making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013)."*

The proposed development will create a new, sustainable community which will integrate with Palmerstown through the introduction of 50 no. high-quality designed residential units with amenity spaces for the enjoyment of the residents of the proposed development. There will be complementary uses at ground floor level including retail units for local services and a gastropub/restaurant with off-licence. It is considered that the proposed development represents a sustainable intensification at an appropriate location and will not have a negative impact on the amenities or character of the area. The proposed development is also in accordance with Section 28 Ministerial Guidelines including 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', DEHLG (2009); 'Urban Design Manual – A Best Practice Guide', DEHLG (2009); 'Design Manual for Urban Roads and Streets', DTTAS and DEHLG (2013/2019); etc, a requirement stipulated within the Development Plan. It is therefore considered that the proposed development is consistent with the policies and objectives of the Development Plan in this regard.

The Development Plan also contains policies and objectives regarding residential design, layout and mix of dwelling types, which are as follows:

HOUSING (H) Policy 10 Mix of Dwelling Types

"It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022."

H10 Objective 1: *"To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the Interim South Dublin County Council Housing Strategy 2016-2022."*

HOUSING (H) Policy 11 Residential Design and Layout

"It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development."

H11 Objective 1: *"To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation."*

The proposed development provides for a total of 50 no. apartment units and offers a variety of unit mix in terms of size and type. In this regard, the proposed development consists of 25 no. 1 beds and 25 no. 2 beds.

Whilst there are two different unit types provided in terms of bedroom provision, it is also important to note that within these two categories of units, there is a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. This ensures that the proposed development provides for the various needs of potential future residents and that it is a sustainable form of residential development which can cater for all age demographics and is adaptable and flexible for their future needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.

The design and layout of the development is such that it provides a high-quality living environment for residents and indeed for visitors to the scheme. The project architects have also selected high-quality, durable external materials and finishes for the development and the proposed landscaping for the development has been designed to ensure high-quality amenity spaces for the enjoyment of residents including southerly facing open spaces, play equipment for children and improvements to the public realm. The surrounding built environment of Palmerstown also provides a wealth of services and amenities for the use and enjoyment of the future residents including local shops, supermarkets, schools, healthcare facilities, church, community centre, swimming pool, public parks, etc.

For further information on the proposed design, unit mix and a detailed breakdown on the unit sizes and types provided, please refer to the detailed schedule of accommodation, i.e. 'Housing Quality Assessment', the Architectural/Urban Design Statement and the associated drawings prepared by Downey Architecture. Please also refer to the detailed landscaping proposals prepared by Downey Landscape.

7.4 Density and Building Heights

In addition to national planning policy and guidelines, the Development Plan has the following objectives regarding density and building height:

HOUSING (H) Policy 8 Residential Densities: *"It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context."*

H8 Objective 1: *"To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."*

The proposed development promotes higher density development that is in close proximity of a QBC, with a Dublin Bus route also being located directly at the subject site. The proposed density of the subject site is 106 units per hectare. The proposed density is in excess of the recommended minimum of 50 units per hectare as advised under Section 28 Ministerial Guidelines. The subject site is located on a high-quality transport route and is located in an existing centre within an urban context (within the M50 ring) and therefore has the capacity to achieve higher densities. The proposed density is therefore considered appropriate due to the site's location adjoining a high-quality transport corridor and the context of the site within the M50 ring.

HOUSING (H) Policy 9 Residential Building Heights: *"It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County."*

H9 Objective 1: *"To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity."*

H9 Objective 2: *"To ensure that higher buildings in established areas respect the surrounding context."*

H9 Objective 3: *"To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height)."*

The proposed development is also consistent with the aforementioned policies and objectives pertaining to building height. The proposed development ranges in height from 4 to 5 storeys. The proposed development is also located within close proximity of a QBC which further warrants higher density development to ensure sustainable use of this high-quality public transportation. It is therefore considered that the proposed development is consistent with the policies and objectives of the Development Plan in this regard.

South Dublin County Council Development Plan 2016-2022 does however set out an objective which restrict building heights on the application site. The objectives are as follows:

HOUSING (H) Policy 7 Urban Design in Residential Developments

H7 Objective 4: *"That any future development of both residential and/or commercial developments in Palmerstown Village and the greater Palmerstown Area shall not be higher than or in excess of three storeys in height."*

The proposed development ranges in height from 4 storeys to 5 storeys which means that the proposed height is in excess of the Development Plan height restrictions. It must be noted that even though the proposed scheme exceeds the stipulated height, it remains generally consistent with other relevant policies and objectives pertaining to the subject site, and thus the proposed height is justified in this instance. Imposition of such height limits within Palmerstown would be contrary to proper planning and would contradict Section 28 Ministerial Guidelines.

It must also be noted that the South Dublin County Council Development Plan 2016-2022 has conflicting objectives insofar as the proposed development is concerned as the Development Plan also contains the following objectives regarding higher residential densities and varied residential building heights:

HOUSING (H) Policy 8 Residential Densities

"It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context."

H8 Objective 1: *"To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."*

H8 Objective 2: *"To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."*

HOUSING (H) Policy 9 Residential Building Heights

"It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County."

H9 Objective 1: *"To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity."*

In light of the above, it is evident that the South Dublin County Council Development Plan 2016-2022 has conflicting objectives insofar as the proposed development is concerned and that objective H7 Objective 4 contradicts National Policy and Section 28 Guidelines.

The application site is located within close proximity to 'Public Transport Corridors' in the context of the densities required under the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009). These areas are defined as being located within 500 metres walking distance of a bus stop, or within 1 kilometre of a light rail stop or a rail station.

In this case, the application site is located within c.800 metres walking distance of a bus stop which is located on a QBC from Lucan into Dublin City Centre, i.e., Bus Stop No. 2241 on R148 (old N4) Chapelizod Bypass which will reduce travel time to the city centre, and is located directly on a bus route that connects the site directly to Dublin City Centre.

Restricting the height of the development at such a well-served location under the South Dublin County Council Development Plan 2016-2022 is a direct contravention of National Policy which promotes increased densities at well served urban sites and discourages general blanket height standards in certain urban areas, such as the subject site.

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that:

“At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.”

“The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village. This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly ‘greenfield’ development and requires a change in outlook.”

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

National Policy Objective 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.”*

It is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height ranging from 4 storeys to 5 storeys is in line with Government guidance and evolving trends for sustainable residential developments in urban areas.

The role of the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ is to ensure the sustainable delivery of new development in urban areas throughout the country. The Guidelines provide clear guidance on the core principles of design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality development in policy documents and through the development management process. The Guidelines should be read in tandem with the ‘Urban Design Manual’ which demonstrates good design principles and their application in designing new residential developments.

The Guidelines recognise that a key design aim in delivering sustainable communities is to reduce, as far as possible, the need to travel, particularly by private car, by facilitating mixed-use development and by promoting the efficient use of land and of investment in public transport. Such policies will help to sustain viable local services and employment.

Section 2.1 of the Guidelines state that, *“the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy.”*

The sequential approach to land development is also recognised by the Guidelines within Section 2.3 which notes that, *“[...] the Department’s Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities [...].”* In this case, the subject site is zoned ‘DC–District Centre’ within the South Dublin County Council Development Plan 2016-2022. The Development Plan adopted a sequential approach when zoning lands for development. Thus, the location of the subject site and the zoning pertaining to the development is appropriate for the subject proposal relating to this mixed-use scheme application. Limiting height will prevent sustainable, compact developments in the heart of such urban areas and will lead to ‘leapfrogging’ of developments and urban/suburban sprawl. Thus, the Development Plan’s objective restricting height at the application site conflicts with National Planning Policy issued under Section 28 Guidelines.

In terms of density, Section 5.8 of the Guidelines state that, *“in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes”.* The proposed density of the subject site is 106 units per hectare. The proposed density is in excess of the recommended minimum of 50 units per hectare. The subject site is located on a high-quality transport route and is located in an existing centre within an urban context (within the M50 ring) and therefore has the capacity to achieve higher densities. The proposed density is therefore considered appropriate due to the site’s strategic location in close proximity to a high-quality transport corridor and the context of the site within the M50 ring.

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ build on the content of the 2018 apartment guidance. The Guidelines state that, *“in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years.”*

The Guidelines also state that, *“apartments are most appropriately located within urban areas. As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments.”*

In light of this, the Guidelines note that, *“City and County Development Plans must appropriately reflect this, in the context of the need to both sustainably increase housing supply and to ensure that a greater proportion of housing development takes place within the existing built-up areas of Ireland’s cities and towns. This means making provision for more residential development to take place on infill and brownfield sites and as refurbishment of existing buildings, to increase urban residential densities.”*

Section 2.23 of the Guidelines also recognises that the National Planning Framework *“signals a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high-quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in development plans, should be replaced by performance criteria, appropriate to location.”*

The objective within the South Dublin County Council Development Plan 2016-2022 materially conflict with this National Policy.

Section 2.4 of the Guidelines also promotes higher density development in accessible, urban locations within easy walking distance to/from high frequency urban bus services. The subject site meets this criterion as it is within 800 metres walking distance of a bus stop located on a QBC from Lucan into Dublin City Centre, i.e., Bus Stop No. 2241 on R148 (old N4) Chapelizod Bypass which will reduce travel time to the city centre, and is located directly on a bus route connecting the site to Dublin City Centre.

The *‘Urban Development and Building Heights, Guidelines for Planning Authorities’* are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). These Guidelines recognise that in recent years local authorities, through the statutory plan process, have started to set generic maximum height limits. However, such limits if inflexibility and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that, *“a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.”*

The Guidelines go on to state that, *“in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.”*

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

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

[...]

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

- (A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and,
 2. The assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;
 Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."

This proposed development is in accordance with SPPR1 and SPPR3 of these Guidelines on building heights in urban areas and this statement, along with the architectural design statement, daylight/sunlight report and verified views/photomontages, all demonstrate how the proposed development is consistent with the wider strategic and national policy parameters and guidelines. Please also refer to Section 6.7 of this report for further details in this regard. Thus, the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

Overall, it is clear that it is National Policy to promote and encourage increased densities in excess of 50 units per hectare on zoned lands in close proximity to public transport corridors. In order to achieve this density in a sustainable manner, the requirement for increased building heights must be explored in appropriate locations to prevent urban sprawl and thus promote a compact urban form. In this case, the proposed density of 106 units per hectare can only be achieved through the provision of increased building heights, with the proposal ranging from 4 to 5 storeys in height. It is argued that for the proposed development to comply with increased densities in close proximity to public transport nodes, an increased building height must also be applied. As such, it is considered that the proposed building height ranging from 4 to 5 storeys and a proposed density of 106 units per hectare is appropriate for the subject site and in compliance with National Policy.

At this juncture, it is important to note that the Development Plan for South Dublin is also currently being reviewed, with the creation of a new Development Plan for the period 2022-2028. The Draft Development Plan appears to be moving away from specifying heights at certain locations within the county and is more in keeping with the national planning policy in this regard.

In light of the above, it is considered that restricting the height of development through a local objective at such a well-served location under the South Dublin County Council Development Plan 2016-2022 is a direct contravention of National Policy which promotes increased densities at well served urban sites and discourages general blanket height standards in certain urban areas, such as the subject site. It is therefore submitted that the proposed development is in accordance with the proper planning and sustainable development of the area.

7.5 Compliance with Chapter 11 Implementation

OBJECTIVE	COMPLIANCE
11.2.1 Design Statement	This application is accompanied by an Architectural/Urban Design Statement prepared by Downey Architecture in accordance with this

11.2.7 Building Height

requirement. This statement outlines site analysis, design rationale and compliance with the 12 Urban Design Criteria guidance (2008 Manual).

The proposed development ranges from 4 to 5 storeys in height and is located at a district centre site within South Dublin County, i.e. a key corner site at the junction of Kennelsfort Road Upper and Wheatfield Road. The proposed height is supported by a strong urban design rationale and justification, all of which is contained within the accompanying Architectural/Urban Design Statement prepared by Downey Architecture; and the Planning Statement which has been prepared by Downey Planning.

11.3.1 Residential (I) Mix Of Dwelling Types

The proposed development provides for an appropriate mix of dwelling types including 25 no. 1 beds and 25 no. 2 beds. There are a number of different unit designs for the aforementioned units. The breakdown of the units is in accordance with the Apartment Guidelines 2018. For further information in this regard, please refer to the Housing Quality Assessment and Architectural/Urban Design Statement prepared by Downey Architecture.

11.3.1 Residential (II) Residential Density

The proposed development provides for a density of c.106 units per hectare. This is in accordance with National Policy and Section 28 Guidelines. Please refer to the Planning Statement which has been prepared by Downey Planning.

11.3.1 Residential (III) Public Open Space /Children's Play

A detailed landscape plan has been prepared by Downey Landscape. The proposed development provides for high quality open space which includes outdoor play opportunities for children in the form of play equipment which is accessible and supervised, and communal roof terraces. Improvements to the public realm are also proposed as part of the overall scheme.

11.3.1 Residential (IV) Dwelling Standards

All apartments accord with or exceed the area standards set out within the Apartment Guidelines (2018) including room sizes, communal open space, storage, etc. For further information in this regard, please refer to the Housing Quality Assessment and Architectural/Urban Design Statement prepared by Downey Architecture.

11.3.1 Residential (V) Privacy

In accordance with national policy and particularly the Urban Design Manual and new Apartment Guidelines, the proposed development has achieved appropriate separation distances to maintain privacy and protect residential amenity, with design solutions and appropriate landscaping also proposed to protect privacy for residents. Please refer to the Architectural/Urban Design Statement prepared by Downey Architecture.

11.3.1 Residential (VI) Dual Aspect

The proposed development provides for dual aspect apartments in accordance with the new Apartment Guidelines (2018). For further details, please refer to the Dual Aspect drawing, Housing Quality Assessment and Architectural/Urban Design Statement prepared by Downey Architecture.

11.3.1 Residential (VII) Access Cores and Communal Areas	The proposed development provides for high quality residential access cores and communal areas. For further details, please refer to the architectural drawings, the Housing Quality Assessment and Architectural/Urban Design Statement prepared by Downey Architecture.
11.3.1 Residential (VIII) Clothes Drying Facilities	Each apartment will have facilities for clothes drying contained within the unit. No communal facilities in this regard are proposed.
11.4.1 Bicycle Standards	The proposed plans provide for bicycle parking spaces within the scheme. All spaces are secure, covered and easily accessible to encourage residents, visitors and customers to cycle to and from the development. For further information on consistency with these standards, please refer to the Traffic and Transport Assessment report and Travel Plan prepared by NRB Consulting Engineers.
11.4.2 Car Parking Standards	The proposed development provides for a total of 53 car parking spaces. For further information on consistency with these standards, please refer to the Traffic and Transport Assessment report and Travel Plan prepared by NRB Consulting Engineers.
11.4.3 Car Parking for Electric Vehicles	The development provides facilities for the charging of battery-operated cars on site. All other parking spaces will also be constructed to be capable of accommodating future charging points.
11.4.4 Car Parking Design and Layout	The proposed development has been designed in accordance with DMURS best practice. For further information in this regard, please refer to the Traffic and Transport Assessment report prepared by NRB Consulting Engineers.
11.4.5 Traffic and Transport Assessments	A Traffic and Transport Assessment (TTA) has been prepared for the development by NRB Consulting Engineers, in accordance with the Development Plan's requirements on traffic and transportation.
11.4.6 Travel Plans	A Travel Plan has been prepared for the development by NRB Consulting Engineers in accordance with Development Plan requirements.
11.5.0 Heritage and Landscape	Photomontages/verified views have been prepared for the proposed development. For further information in this regard, please refer to the photomontages prepared by Digital Dimensions.
11.6.0 Infrastructure and Environmental Quality	A Flood Risk Assessment and a detailed Infrastructure Services Report have been prepared by GDCL Consulting Engineers which fully detail compliance with flood risk, SUDS, water services, etc. A Construction and Demolition Waste Management Plan has been prepared by GDCL Consulting Engineers and accompanies this application.
11.8.0 Environment Assessment	The project is sub-threshold and does not require EIA, whilst a Screening Report for Appropriate Assessment has been carried out by Openfield Ecological Services.

8.0 Conclusion

This Planning Statement has been prepared to accompany a planning application to South Dublin County Council for a proposed mixed-use development on lands at 'The Silver Granite' pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park), Palmerstown, Dublin 20.

The proposed development subject to this application provides for the re-development of 'The Silver Granite' site, and consists of the demolition of the existing building on site and the construction of a mixed-use development comprising a gastro pub/restaurant with off-licence, 2 no. retail units at ground floor level, and 50 no. apartments (25 no. 1 beds, and 25 no. 2 beds) provided with private balconies/terraces and communal roof gardens, on the floors above, in 1 no. 5-storey block over partial basement.

It is considered that the proposed development is an opportunity to deliver housing at this strategic location in close proximity to high-quality public transport and a wide range of existing social, community and physical infrastructure, which will help meet the ever-increasing demand for residential accommodation in the Greater Dublin Area. The proposed development is deliverable in the short term. The proposed development represents a high-quality scheme of an appropriate scale and of a sustainable residential density reflective of its strategic location in close proximity to Dublin city, whilst also respecting the Palmerstown area and its context and character. This planning statement demonstrates that the proposed development complies with the relevant national, regional and local planning policy. In light of the foregoing, Downey Planning trust that the enclosed plans and particulars pertaining to this planning application are in order and thus respectfully request that South Dublin County Council grant planning permission in this instance.

