



Statement of Consistency

Proposed Residential Development, Units 64 & 65, Cherry Orchard Industrial Estate, Dublin 10

Client: AAI Palmerstown Ltd.

December 2021

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Contents

Introduction	1
National Policy	2
Rebuilding Ireland	2
Project Ireland 2040: National Planning Framework	2
S. 28 Ministerial Guidelines	6
Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2020	6
Urban Development and Building Heights: Guidelines for Planning Authorities 2018	9
Sustainable Residential Development in Urban Areas, 2009	13
Urban Design Manual: A Best Practice Guide	13
Design Manual for Urban Roads and Streets, 2013	16
Childcare Facilities: Guidelines for Planning Authorities 2001	17
Regional Policy	18
Eastern and Midlands Regional Assembly: Draft Regional Spatial & Economic Strategy	18
Local Planning Policy	22
South Dublin County Council Development Plan 2016-2022	22

Introduction

1.1 Purpose of Statement

This statement of consistency has been prepared in accordance with the provisions of Section 5(2) of the Planning and Development Acts and accompanies a Strategic Housing Development (SHD) application. The adopted SHD legislation specifies that all SHD applications must be accompanied by a statement which demonstrates that they are consistent with the relevant National, Regional and Local policies as pertaining to the proposed development.

AAI Palmerstown Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at Units 64 & 65, Cherry Orchard Industrial Estate, Palmerstown, Dublin 10. The development will consist of the demolition of an existing warehouse / factory building and the construction of a residential development of 144 no. apartments with supporting tenant amenity facilities (gym and activity areas, lounges and meeting room), employment uses including 2 no. incubator units and a remote working space, building management facilities and all ancillary site development works. The proposed development includes 72 no. 1-bedroom apartment and 72 no. 2-bedroom apartments to be provided as follows: Building A (35 no. 1-bedroom & 24 no. 2-bedroom over 5-9 storeys), Building B (7 no. 1-bedroom & 10 no. 2-bedroom over 3-4-storeys), Building C (16 no. 1-bedroom, 19 no. 2-bedroom over 5-storeys), Building D (14 no. 1-bedroom & 19 no. 2-bedroom over 4-5-storeys). Vehicular access to the proposed development will be provided via an entrance from the existing estate road as accessed from Kennelsfort Road Upper. The proposal includes improvement works on the northern side of the junction at the estate road/Kennelsfort Road Upper, new pedestrian/cycle paths on the estate road to the south of the site, and provision of a controlled pedestrian crossing on Kennelsfort Road Upper to the west as part of enabling infrastructure. The proposed development provides for outdoor amenity areas, landscaping, external podium lift, under-podium and street car parking, bicycle parking, bin stores, ESB substation, public lighting, roof mounted solar panels and all ancillary site development works.

Based on a review of precedent, a material contravention statement is required and has also been submitted with the planning application in respect of some local policy objectives.

National Policy

Rebuilding Ireland

The action plan for housing and homelessness is based around 5 pillars, including the aim of building more homes as well as improving the rental sector. The plan includes a number of Action points relating to the 5 key pillars.

Policy	Consistency of scheme
<p>Pillar 3 – Build More Homes aims to support the building of new homes and outlines the Government objective “to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs”. This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.</p>	<p>The location and suitability of the subject site, as well as proposed mix of dwellings, specifically designed for the Built-to-Sell sector, ensures that the subject development will contribute positively to meeting the pillar three objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 homes on average per annum.</p> <p>The proposed development falls under the Strategic Housing Development planning process aimed at fast tracking the delivery of much needed housing. In addition, as outlined below, the proposal is consistent with the National Planning Framework and its stated aim of consolidating new population and housing growth within the footprint of the main towns and cities.</p>

Project Ireland 2040: National Planning Framework

National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is outlined as being to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland’s regions and cities other than Dublin, while also recognizing Dublin’s ongoing key role.

Policy	Consistency of scheme
<p><i>National Policy Objective 2A - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.</i></p> <p><i>National Policy Objective 3A: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements</i></p>	<p>The proposed development is consistent with all strategic aims and objectives within the NPF. Of specific relevance are the following:</p> <ul style="list-style-type: none"> - The subject site is located on lands which are in the north-western corner of the Cherry Orchard Industrial Estate, immediately adjoining residential development to the west and close to the District

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

National Policy Objective 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 8 - Ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

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 Planning Objective 13 - in urban areas, planning and related standards, including in particular, 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 27 - Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

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

National Policy Objective 33 - To 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.

Centre of Palmerstown within the South Dublin County Council area. The area is in proximity to the boundary of the Dublin City Council administrative area to the south-east and is part of Dublin City in the National Planning Framework 2040. NPO 2A, 3A, 3B, 11, 32

- The proposed development is in accordance with objective 8 which aims to increase Dublin City and Suburbs to a minimum population of 1,173,000 by 2040 and which will require a growth rate of 20-25%. The provision of 144 apartment units will contribute directly to a positive increase in population growth. The proposed development will also assist in achieving the target delivery of 550,000 households by the end of 2040. NPO 8, 11
- The proposed development is a build to sell scheme of high-quality design, offering apartment types and sizes tailored to accommodate young professionals working in the area and the city with a range of supporting communal facilities including an activity area, gym, shared lounge areas, a hot desk area, a lobby with concierge service and a meeting room. The proposed development includes the provision of a semi-private landscaped podium garden and a recreational area containing a play area, alongside generous public open space provision. The locality is already well supported by a range of urban amenities and served by good public transport provision. We consider that the proposed development will result in the creation of an attractive and livable urban place. NPO 4
- The site represents a gateway location for the start the process of regeneration of these underutilised industrial lands, located at the northwest corner of the industrial estate, close to the district centre of Palmerstown and immediately adjacent to existing residential development to the west. As such, the site is considered to be strategically important in terms of its role as a likely enabler of further future regeneration in the area. The proposal has been designed on this very basis with increased height being considered appropriate in light of this role.
- Car parking provision at a ratio of 0.45 spaces per unit, will include EV charging points and spaces for the mobility impaired in line with the South Dublin County Council Development Plan. In addition, 8 no. motorcycle spaces are provided. Under podium parking is proposed for the exclusive use of the residents, with 2 no GoCar parking spaces provided on the Cherry Orchard Industrial Estate Road. 226 no. resident bike parking spaces and 84 no. visitor bike parking spaces are also proposed at ground level, significantly in excess of the requirement under the Apartment Guidelines. We consider that the proposed height and car parking provision are appropriate in view of the quality of the proposed design and due to the site's strategic, central and accessible location. NPO 13

- The development of the site layout has sought to maximise the potential to achieve pedestrian and cycle connectivity with the wider area and reduce car dependency.
- Existing illuminated pedestrian footpaths and wide grass verges are located adjacent to both sides of Kennelsfort Road Upper. However, the existing footpaths along Cherry Orchard Industrial Estate Road are in a poor condition. It is proposed to upgrade these existing public footpaths, with the generous set back of the buildings offering the opportunity for wide footpaths with emphasis on the greening of the street interface with planting proposed to create a natural buffer between the footpath and the street.
- It is also proposed to provide a dedicated cycle lane along the frontage of the site that will connect with the existing cycle lanes on Kennelsfort Road Upper.
- All cycle and pedestrian infrastructure will integrate with future developments and create good connections to employment areas within the local area and wider Dublin City. NPO 27.
- The existing pedestrian infrastructure provides connections to Palmerstown Village and District Centre plus connections to bus stops of high frequency bus routes.
- Dublin Bus operates a northbound and southbound service for routes 18 and 26 along the Kennelsfort Road Upper, a short walk from the site. The number 18 operates between Palmerstown and Sandymount at a frequency of between 10 and 25 minutes during the day. The number 26 operates between Merrion Square and Liffey Valley Shopping Centre every 30 minutes.
- There is a Quality Bus Corridor approx. 3-4 minutes' walk from the site along which the number 40 route operates between Charlestown Shopping Centre to Liffey Valley every 10-12 minutes at peak times. The 76 routes between Chapelizod and Tallaght also operates along the QBC every 20 minutes. These routes are set for further enhancements under BusConnects Core Bus Corridor (G Spine).
- The central location of the subject lands will contribute towards the sustainability of the proposed development. The site is in close proximity to Palmerstown District Centre, within 200m of Pobalscoil Iosolde / Palmerstown Community College with 6 other schools within 1.25km of the site. Medical facilities in the area include Cherry Orchard Hospital and Ballyfermot Primary Care Centre which are located to the south of the site. Other services in the area include several comparison and convenience stores plus recreational facilities notably Collinstown Park, Glenaulin Park, Palmerstown Sport Complex, Cherry Orchard Equine Centre, Cherry Orchard Community Gardens, Ballyfermot Sports Complex, Ballyfermot United Football Club and St. Patricks GAA Club.

Key Future Growth Enablers for Dublin Include;

- Identifying a number of ambitious large-scale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area and the measures required to facilitate them as integrated, sustainable development projects.
- The development of an improved bus-based system, with better orbital connectivity and integration with other bus networks
- Delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal, river and coastal corridors.

The development of this zoned site will contribute directly to the realization of compact growth and provide a critical mass of population to sustain the viability of the existing public transport and to promote sustainable mobility across the site and to other areas. NPO 33, 35

- The site is zoned as REGEN (To facilitate enterprise and/or residential-led regeneration) The proposed development comprises of the regeneration of a brownfield site (former industrial building) and its redevelopment as a new residential quarter may act as a stimulus for the development of other brownfield and vacant sites in the vicinity. NPO 35
- The Key Future Growth Enablers for Dublin include delivering ambitious large-scale regeneration projects for the provision of new employment and housing infrastructure in Dublin City and Metropolitan Area as integrated, sustainable projects. The subject site, zoned as REGEN lands, is located within the environs of Dublin City's built-up area and its regeneration will have a positive impact on the areas surrounding Cherry Orchard Industrial Estate.
- Its redevelopment as a residential-led quarter with some localised employment uses will contribute towards the critical mass necessary to underpin public transport and cycle infrastructure improvements in the area.

S. 28 Ministerial Guidelines

Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2020

These guidelines update the Sustainable Urban Housing: Design Standards for New Apartments guidelines published in 2015. They refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. The guidelines indicate that urban areas are the most suitable locations for apartments and divide these areas into 3 categories: 1. Central and/or Accessible Urban Locations, 2. Intermediate Urban Locations, 3. Peripheral and/ or Less Accessible Urban Locations.

Policy	Consistency
<p>Section 2.4 of the Guidelines define Central and/or Accessible Locations as:</p> <p>Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;</p> <p>Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and</p> <p>Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10-minute peak hour frequency) urban bus services.</p> <p>These definitions are meant to be interpreted as typical rather than 'exhaustive' and the Guidelines indicate that the full range of locations 'will require local assessment that further considers these and other relevant planning factors'.</p> <p>The Guidelines contain various Specific Planning Policy Requirements and objectives that apply to the proposed development.</p>	<p>We consider that the proposed development site can be defined a Central and/or Accessible Location, that is suitable for high density development comprising of a mix of apartment types. Palmerstown is a highly accessible location based on the following:</p> <ul style="list-style-type: none"> - The subject site adjoins the Cherry Orchard Industrial Estate, is c. 1.5km from the Clondalkin Industrial Estate and Park West Business Campus and 2.5km from John K. Kennedy Industrial Estate and Western Industrial Estate. - It is c 800m from Cloverhill Prison and c. 400m from Cherry Orchard Hospital, a large nursing home for the elderly. These employment locations in addition to the retail employment available at the nearby Liffey Valley Retail Park (c. 500m direct line or 1km by road) and Palmerstown District Centre (c. 250m) provide a wide range of employment opportunities in the area. - The subject site is within easy walking distance of a number of high-capacity bus routes including the number 40 (3 – 4 minute walk) services which operates at a 10 – 12 minute peak time frequency, the number 18 which operates at a 10 – 25 minute frequency at different stages in the day, the number 76 which runs every 20 minutes and the 26 which has a 20 minute frequency. These bus routes stop at Palmerstown District Centre and offer high

	<p>frequency bus services to the employment centres of Tallaght, Liffey Valley and Dublin City Centre (refer to Connectivity Map – Appendix 1) .</p>
<p>Specific Planning Policy Requirement 1</p> <p>Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p>	<p>The proposed scheme is in full accordance with Specific Planning Policy Requirement (SPPR) 1. The development seeks to deliver 72 no. 1 bedroom apartments (50%) and 72 no. 2 bedroom apartments (50%).</p>
<p>Specific Planning Policy Requirement 3</p> <p>Minimum Apartment Floor Areas Studio apartment (1 person) – 37 sq. m 1-bedroom apartment (2 persons) – 45 sq. m 2-bedroom apartment (3 person)- 63 sq.m 2-bedroom apartment (4 persons) – 73 sq.m 3-bedroom apartment (5 persons) – 90 sq. m</p>	<p>As outlined in the accompanying schedule of accommodation prepared by ShipseyBarry Architects, all the apartments to be provided within the scheme either meet or are in excess of the minimum required floor areas. 62% of the units (89 units) exceed the minimum floor area standards by 10% or more.</p>
<p>Specific Planning Policy Requirement 4</p> <p>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <p>(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.</p>	<p>As outlined in the accompanying Aspect Ratio drawing prepared by ShipseyBarry Architects, 58% of the proposed units are dual aspect, in excess of the policy requirement of 33% minimum for central/ accessible locations as outlined in the 2020 apartment guidelines.</p> <p>Of the single aspect units, 47% are south facing units, with east/west facing units accounting for 33% of the single aspect units. North facing single aspect units only account for 8% of the total units, of which overlook amenity space.</p>
<p>Specific Planning Policy Requirement 5</p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p>	<p>Ceiling heights of 2.85m are provided for in all units within the proposed scheme as outlined in the accompanying housing quality assessment prepared by ShipseyBarry Architects.</p>
<p>A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.</p>	<p>The proposal provides 226 no. resident bike parking spaces and 84 no. visitor bike parking spaces, significantly in excess of the requirement under the Apartment Guidelines (of 216 bike spaces minimum).</p>

Minimum floor areas for private amenity space

Studio- 4 sq. m
One bedroom- 5 sq. m
Two bedrooms (3 person)- 6 sq. m
Two bedrooms (4 person) – 7 sq. m
Three bedrooms- 9 sq. m

This standard has been fully complied with. All apartments enjoy either terraces or balconies that meet or exceed the minimum area requirement for private open space. See accompanying schedule of accommodation prepared by ShipseyBarry.

Minimum communal amenity space requirement

Studio- 4 sq. m
One bedroom- 5 sq. m
Two bedrooms (3 person)- 6 sq. m
Two bedrooms (4 person) – 7 sq. m
Three bedrooms- 9 sq. m

The proposal provides for a public amenity area of 1,303m² in the form of the central podium garden and a public amenity playground and landscape areas within the Cherry Orchard Apartment development. This significantly exceeds the minimum requirement (864m²) as set out in the apartment guidelines. This is in addition to the 574.5m² of proposed communal support facilities/amenities which includes lounges, gym, a remote working space, 2 no. incubator workspaces, a meeting room and an activity area.

Chapter 4 of the Guidelines promotes the provision of communal facilities within apartment schemes to enhance apartment livability and services provided to apartment occupants.

The development proposes to provide communal facilities (547.5m²) including an activity area (68.4 m²), a gym (108.1m²), 4 no. lounge areas (274.9m²), a meeting room (37.1m²).

Separate to this, employment uses are provided in the form of 2 no. incubator workspaces and also remote working space to serve future residents of the development.

Urban
Development and
Building Heights:
Guidelines for
Planning
Authorities 2018

The guidelines published in December 2018 have arisen from a recognition that the ambitious targets contained within the NPF, particularly in relation to accommodating 50% of future growth within the existing footprint of our cities, will not be met unless developments of greater height and scale are supported by the Planning Authorities. The guidelines refer to the traditional building heights in our urban areas which have been limited and generally low rise in terms of height. The need to secure compact and sustainable urban growth forms will require the reuse of brownfield infill sites that are located in well serviced urban locations and are served by good public transport links.

Policy	Consistency
<p>SPR1 - In accordance with Government policy to support increased building height 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 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.</p>	<p>The subject site can be considered a suitable redevelopment site where increased building heights would be appropriate, given its strong connectivity and central accessible location. The South Dublin County Council Development Plan Policy 6 proposes that tall buildings in excess of five storeys be directed to landmark locations in Town Centre Regeneration and Strategic Development Zones. The subject site’s REGEN zoning (“to facilitate enterprise and/or residential led regeneration”) is described in the South Dublin County Council Development Plan as having been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential-led development. The current proposal will consist of a residential scheme of 4 separate buildings, ranging in height from 1 up to 9 storeys and is justified on the basis of compliance with development management criteria set out below.</p>
<p>SPR3 - It is a specific planning policy requirement that where:</p> <ol style="list-style-type: none"> 1. an applicant for planning permission sets out how a development proposal complies with the criteria below; 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. 	<p>The SPR3 criteria are addressed in the following sections.</p>
<p>Development Management Criteria In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria: <i>At the scale of the relevant city/town</i></p>	<p>The subject site is located in a highly accessible location that meets the definition of a ‘Central and/or Accessible Urban Location’ as defined the Apartment Guidelines on the basis that is within easy walking distance (5 minutes or 400-500 m) to a high frequency urban bus services (current service every 10-12 minutes), namely the 40 which serves the Charlestown Shopping Centre to Liffey</p>

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.
- Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.
- On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

Valley via a quality bus corridor. The path of the route along the Ballyfermot Road is also a BusConnects Bus Corridor (G Spine) which is earmarked for significant upgrades in terms of dedicated bus lands to improve travel times and new cycle paths to tie in with existing infrastructure. The route will connect local residents to some key employment centres across Dublin.

The increase in building height on the site has been considered in detail having regard to its immediate context. Significant public realm works are proposed to the west and south of the scheme to provide definition and anchor the proposal into the local context.

The proposals provide for a new formal and active living edge on Kennelsfort Road Upper complete with dedicated cycle lane, green buffer setback and a mix of live uses including a range of communal areas. The operational development will also contribute to placemaking via the development of a number of communal and publicly accessible amenity spaces including a playground.

A Townscape and Visual Impact Assessment for the project has been undertaken by a chartered landscape architect which concludes that the proposed development is an appropriate contribution to both the existing and likely future built fabric of this urban area and it will not result in any significant townscape or visual impacts.

At the scale of district/ neighbourhood/ street The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape

- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of perimeter blocks or slab blocks with materials / building fabric well considered.
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).
- The proposal makes a positive contribution to the improvement of legibility through the site or

The proposal will make an extremely positive contribution to the urban neighborhood addressing underutilization of zoned REGEN land and introducing much needed residential accommodation to address housing needs and support the critical mass of existing services in the nearby local centre.

The proposal enhances the urban design context on a brownfield site which is not subject to environmental constraints such as flood risk. It has also been designed to facilitate the future development of the REGEN lands to the east of the site by means of a shared access arrangement, widened pedestrian and cycle paths which can be easily extended through the regeneration area commensurate with follow on phases of development.

<p>wider urban area within which the development is situated and integrates in a cohesive manner.</p> <ul style="list-style-type: none"> The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood. 	<p>A prominent site, the proposal will improve legibility in the local area creating new identity at the start of the regeneration area by introducing high-quality contemporary elevations and treatments. The development will provide active frontage onto Kennelsfort Road Upper thus providing passive surveillance and improving nighttime safety. The proposal will contribute directly to a mix of uses including a gym alongside residential. The local housing market in the area is typified by traditional dwelling housing stock. The subject Build to Sell development will contribute positively to available dwelling typologies in the area.</p>
<p><i>At the scale of the site/building</i></p> <ul style="list-style-type: none"> The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution. 	<p>As illustrated in the Urbanism section in the submitted Design Statement by ShipseyBarry Architects, the form, massing, and height of the proposed development has been considered in detail relative to future occupier requirements and the avoidance of impacts in the local environment. The design approach has been tested by means of daylight reception and shadow analysis (ref. accompanying reports by DKP). The proposal affords access to natural daylight and ventilation and appropriately mitigates the potential for any impacts on adjoining amenities.</p> <p>As outlined, it has been demonstrated by means of a number of technical assessments that the proposed development meets all quantitative performance standards set out in the BRE document 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.</p>
<p><i>Specific Assessments</i></p> <ul style="list-style-type: none"> To support proposals at some or all of these scales, specific assessments may be required, and these may include: Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include 	<p>The subject site is located within an Outer Approach Area relating to Casement/Baldonnel Aerodrome, which is situated approximately 6 km southwest. Under the Outer Approach Surface (outside the Inner Approach Area but within the approach funnels), graded heights of development below the Obstacle Limitation Surfaces of</p>

measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

- In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.
- An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. An assessment that the proposal maintains safe air navigation.
- Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

the runways may be permitted, subject to demonstration that the development is not an obstacle to the operation of a runway. Under Section 11.6.6 of the South Dublin County Council Development Plan 2016, the Planning Authority will require the applicant to submit a longitudinal section through the relevant Approach Surface funnel based on the ordnance datum of the relevant runway and the application of the following aerodrome surface slopes. Please refer to submitted section by ShipseyBarry Architects which confirms there will be no adverse impact arising from the proposed development.

A microclimate report has been prepared by DK Partnership which confirms that the proposed development will not have significant effects on microclimate, rather this will remain as per the established local baseline.

A telecommunications statement has also been prepared by DK Partnership which confirms that the proposed development will not have any impact on telecommunications channels.

The site has been subject to ecological survey. A preliminary ground level roost assessment, including a tree and building inspection and a night-time bat activity survey were carried out. Based on observations made during these surveys, the value of the existing buildings and trees was assessed as negligible for bats.

The application is accompanied by a detailed urban design statement. The site is not located near any protected structures or architectural conservation areas and the project will not have an impact on any buildings of heritage value. The project has been subject to Environmental Impact Assessment screening and Appropriate Assessment screening.

Collectively, we consider that these assessments demonstrate that the overall scale and massing of the proposal is well judged, carefully composed and an appropriate response to local context.

Sustainable Residential Development in Urban Areas, 2009

The Sustainable Residential Development in Urban Areas, 2009 provides statutory guidelines which will assist planning authorities, developers, architects, and designers in delivering high quality residential development. The objective of the document is to produce high quality and crucially sustainable developments. The guidelines mentioned in the table below are aimed at assisting these stakeholders in creating quality homes and neighbourhoods at places where people want to live, work and raise families.

Guidelines	Consistency of scheme
<p>The specific guidelines are as follows:</p> <ul style="list-style-type: none"> • The Role of Design • Sustainable Neighborhoods • Cities and Larger Towns • The Home and Its Setting 	<p>An Architectural Design Statement prepared by ShipseyBarry Architects accompanies this submission which addresses these specific guidelines listed in order to create a sustainable place and neighbourhood where people want to live and work.</p>

Urban Design Manual: A Best Practice Guide

The Proposed Residential Development at Palmerstown has been designed in accordance with best practice as outlined in the 2009 Urban Design Manual. The Manual outlines 12 criteria that should guide urban residential development in the context of the individual homes, the site on which they are located and the wider neighborhood. A comprehensive Architectural Design Statement prepared by ShipseyBarry Architects accompanies this application which addresses the proposed developments compliance with these 12 criteria and is summarised as follows:

Policy	Consistency
<p>Context How does the development respond to its surroundings?</p>	<p>The proposed has been carefully considered at a macro and micro level within its surrounding context given its location on the edge of a parcel of REGEN lands. Careful sectional and visual analysis of the surrounding scale and urban grain has been undertaken. The development was originally conceived as a 5-storey courtyard development at the edge of the REGEN lands and with SDCC guidance a landmark gateway element was introduced to the South West corner. The scale relationship to Palmerstown Crescent, in particular has been assessed in terms of proximity, shadow analysis and the requirement for new urban renewal of the REGEN zoning to present a sustainable density at this transformative location. The development seeks to -</p> <ul style="list-style-type: none"> • Make an improved and appropriate contribution to the south and west street edges with high quality landscaping and considered treatments for varying uses that present at these locations. • Massing breakups broken and stepped across the development reacting to varying boundary and context settings. • Present a new contemporary aesthetic to identify the lead for future phases to the East on the regen lands.
<p>Connections How well connected is the new neighbourhood?</p>	<p>The new residents benefit from the nearby district centre (250m) to the north. Public realm has been provided to give a high-quality streetscape to Kennelsfort Road Upper with the existing no.18 (stop 4888) at the west entrance to the site.</p>

	<p>Kennelsfort Road Upper has an existing bike lane bounding the site to the west. The proposal extends this from the junction onto Cherry Orchard Industrial Estate Road, designed to have separation from pedestrians and traffic. The development is permeable via access routes off Cherry Orchard Industrial Estate Road and provision is made for future development to the east lands by way of a new roadway to the eastern boundary to be given in charge.</p> <p>As explored in the masterplan section of accompanying Design Statement prepared by ShipseyBarry Architects, it is noted that the site represents the northwest corner of the REGEN lands with the main desire lines to Palmerstown Village to the north and high frequency bus stops to the south on Kennelsfort Road Upper. This informs the main pedestrian linkage on to Cherry Orchard Industrial Estate Road to the south boundary for access to the development.</p> <p>The density of the scheme with these linkages provides support for a more efficient public transport model at this location.</p>
<p>Inclusivity How easily can people use and access the development?</p>	<p>Live frontages are provided for along Cherry Orchard Industrial Estate Road with the main access route provided to the main semi-public space within the proposal. A management company will be established to upkeep all the landscape areas with a taken in charge area provided on Kennelsfort Road Upper and to the new street on the eastern boundary. All open areas are designed to have passive supervision and visibility. Communal spaces are provided for residents, accessible off Kennelsfort Road Upper offering further supervision and activity at street level. A play area is provided central to the courtyard to enhance community and activity central to the scheme. Buildings are set out to have an open aspect to the streets they serve with landscape buffers provided to ground floor units. Public access to the podium is provided by way of ambulant steps and street lift access, with the main visitor access via a concierge in Building A to the south west.</p>
<p>Variety How does the development promote a good mix of activities?</p>	<p>The development provides for mix of uses on the site through residential and supplementary employment uses. A mix of apartment types is proposed comprising 50% 1 bed, and 50% 2 bed apartments. This mix is accommodated across a range of different apartment formats providing for a diverse choice of unit type. The ratio of 1-bedroom units provides an alternative to the predominantly 3 and 4 bedroom semi-detached dwellings provided locally.</p>
<p>Efficiency How does the development make appropriate use of resources, including land?</p>	<ul style="list-style-type: none"> • The proposal replaces the now derelict former warehouse facility with the development delivering a proposed plot ratio of 2.13 and site coverage of 58%. This is a highly efficient regeneration of the land use while maintaining sensitivity around scale and light within its context. • The building is designed to current NZEB standards with green roofs and PV energy combined in the sustainable design. The option of air source heat pumps is also being examined.

	<ul style="list-style-type: none"> • The orientation of kitchen/dining/living areas, internal and external communal spaces have been organised to maximise solar aspect for comfort with over 58 % dual aspect achieved on apartments. • All waste management on the facility has designated recycling areas for residents and will be actively promoted and monitored by management.
<p>Distinctiveness How do the proposals create a sense of place?</p>	<p>The proposed development is the first of the REGEN lands at this location to be brought forward, setting a benchmark for further development to the east. High quality urban design has been applied to building forms and streetscapes to provide a distinctive new regeneration aesthetic for this emerging location. The building has a high glazing percentage in a formal gridded urban arrangement offering a distinctive high quality aesthetic impression.</p>
<p>Layout How do the proposals create people friendly streets and spaces?</p>	<p>The design allows for an active relationship on Cherry Orchard Industrial Estate Road and at the junction to Kennelsfort Road Upper. The building formation creates a protective elevated enclosure around the central amenity space of the scheme to enhance acoustic tranquillity from the roadway & potentially more problematic future noise intensification from the warehousing to the east. This internal landscape area provides for a four-sided amenity space giving a more tranquil retreat from Kennelsfort Road Upper carriage way.</p>
<p>Public Realm How safe, secure and enjoyable are the public areas?</p>	<p>All public areas are designed to have a good quality interconnectivity, active street frontage and supervision throughout the scheme. A limited number of apartments are located on street level at busier frontages and are provided with landscape buffers where this occurs. The building line is set-back along Kennelsfort Road Upper and Cherry Orchard Industrial Estate Road to accommodate a green buffer for pedestrian comfort with high quality paving and street furniture provided. Attention is given to detailing, material use and design in the landscape plan that accompanies the proposal. All open spaces are designed to have passive supervision and visibility.</p>
<p>Adaptability How will the buildings cope with change?</p>	<p>In the ground floor street frontage area which accommodates communal areas the proposed building structure has been designed to be an open grid with non-intermediary bearing wall supports required, offering a flexible open structural grid should internal modification be required from the current layout into any possible future requirements. Internal apartments have been designed to have service risers at the edge of plans to allow internal modification of non-load bearing walls where required in the future.</p>
<p>Privacy and Amenity How does the scheme provide a decent standard of amenity?</p>	<p>The building is set out to have appropriate distances between new residences to offer privacy and maintain private amenity standards. All windows will be triple glazed to minimize sound transmission and sited in such a way to prevent overlooking. Clever use of architectural design features are included to mitigate against any potential for overlooking.</p>

	<p>The privacy of the gardens of the residents of Palmerstown Crescent is ensured by means of appropriate setback distances, the omission of west facing balconies in the corner taller building, as well as west facing living rooms.</p> <p>Within the development all access level apartments are provided with green buffers to their amenity spaces. The majority of apartments enjoy recessed 'loggia' style balconies for added privacy between neighbours' amenities.</p> <p>As the Qualitative Assessment section in the enclosed Design Statement demonstrates all storage provision meets the minimum areas set down in the Sustainable Urban Housing, Design Standards for new apartments.</p>
<p>Parking How will the parking be secure and attractive?</p>	<p>Residents' parking is under-croft with a landscape podium overhead. Residents have 65 parking spaces, with 2 surface level car share spaces provided. E.V. and motorbike parking are also provided for within the development. Secure covered stacked bike spaces are proposed for residents to current standards within the development with visitor bike parking located at various access points throughout the scheme.</p>
<p>Detailed Design How well thought through is the building and landscape design?</p>	<p>Consideration has been given to the detailed design of the development from materials maintenance to glazing elements design. The materials are complementary with a simple palette of materials proposed to give a clear, defined aesthetic with crisp rigour to present a formal contemporary form. Maintenance and access arrangements have been allowed for in all aspects of façade & landscaping upkeep.</p>

Design Manual for Urban Roads and Streets, 2013

The Design Manual for Urban Roads and Streets provides guidance relating to the design of urban roads and streets. The document presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual streets. The relevant principles, approaches and standards listed in the table below are intended for use by suitably qualified and experienced designers who work within the built environment professions in order to create attractive streets and roads which facilitates a broad range of users.

Relevant Principles and Guidelines	Consistency of scheme
<ul style="list-style-type: none"> Integrated Street Networks Movement and Place Permeability and Legibility Management Movement, Place and Speed Streetscape Pedestrian and Cyclist Movement Carriageway Conditions 	<p>This Strategic Housing Development submission is supported by a Traffic Impact Assessment produced by TPA Consulting Engineers, which addresses the relevant policies and principles listed in the Design Manual for Urban Roads and Streets 2019, in order to create a balanced and attractive street and road network for the proposed development.</p>

**Childcare Facilities:
Guidelines for
Planning Authorities
2001**

The national Childcare Guidelines for Planning Authorities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

Policy	Consistency of scheme
<p>Appendix 2:</p> <p>In new communities/ new housing areas, planning authorities should require the provision of at least one childcare facility for new housing areas and other areas of residential development unless there are significant reasons to the contrary.</p> <p>An indicative standard of one childcare facility per 75 dwellings is recommended. One facility providing a minimum of 20 childcare facilities is considered to be a reasonable starting point.</p> <p>The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas</p>	<p>The proposed development is a residential scheme consisting of 144 units. The Statement of Childcare Rationale prepared by HW Planning that accompanies this application sets out the justification for not providing a childcare facility in response to part 7 (c) of the pre-application consultation application form for Strategic Housing Developments which states the following:</p> <p><i>‘Where it is not proposed to provide one childcare facility for each 75 houses in the proposed development, the request should be accompanied by a statement of the rationale for this.’</i></p> <p>Having regard to the 2020 Apartment Guidelines, it is considered that the 72 no. 2-bedroom apartments fall below the 75-unit threshold that would typically trigger the requirement for a 20 no. child place creche. Furthermore, the guidelines readily acknowledge that not all 2-bed units will reasonably give rise to childcare demand.</p> <p>Given the nature of the development, it is envisaged that the resident profile will be predominantly young professionals and with a smaller than average proportion of families, as is reflected in the existing population profile of the area. Based on a review of the capacity in existing childcare facilities in the vicinity, there is sufficient additional capacity to cater for any childcare demand arising for the proposed scheme.</p>

Regional Policy

Eastern and Midlands Regional Assembly: Regional Spatial & Economic Strategy

The Regional, Spatial and Economic Strategy (RSES) was published in 2020. The purpose of the RSES is to support the implementation of the National Planning Framework whilst facilitating choices that reflect the differing needs of the regions. In respect of Dublin City, the strategy supports 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 coordinated with the delivery of key infrastructure projects. The subject site is located within the area governed by the defined Dublin Metropolitan Area Strategic Plan (MASP). The guiding principles for the development of this area include the following:

Policy	Consistency
<p>Compact sustainable growth and accelerated housing delivery:</p> <p>To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.</p>	<p>The proposed development consists of the redevelopment of a disused vacant warehouse into a predominantly residential area. The re-development of this brownfield site will contribute positively towards achieving the sustainable growth targets set by the Dublin Metropolitan Area Strategic Plan.</p> <p>The proposed development consists of the development of a site zoned REGEN (to facilitate enterprise and/or residential led regeneration) in the South Dublin County Council. Its development will contribute directly to a positive increase in residential supply and provide the critical mass necessary to support the high-quality public transport services in the area.</p>
<p>Integrated transport and land use</p> <p>To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.</p>	<p>The site is an accessible and well-connected location in close proximity to bus connections serving Dublin City Centre and other employment, service and education hubs. The subject site is in close proximity to a number of high frequency bus routes notably the 18 and 26 services and the 40 service operating along the nearby North Clondalkin Quality Bus Corridor. The connectivity of the site is outlined in the accompanying connectivity map. The site's connectivity is significantly enhanced under the proposed BusConnects plan when it will have ready access to the S4 orbital service and the G2 Spine service with bus frequencies of 10 minutes and 12- 15 minutes respectively. In addition, the Number 80 Radial Service along Kennelsfort Road Upper will operate with a weekday frequency of between 10 – 15 minutes (ref Statement of Consistency Traffic and Transport prepared by</p>

	HW Planning and Traffic and Transportation Assessment prepared by TPS Consultant Engineers)
<p>Social regeneration: To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.</p>	<p>The subject site is a brownfield site, comprising disused and vacant industrial warehouses. Its redevelopment as a residential scheme will act as a stimulus for the redevelopment and regeneration of the other lands zoned as REGEN in the Cherry Orchard Industrial Estate.</p>
<p>Metropolitan scale amenities:To enhance provision of regional parks and strategic Green Infrastructure, to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast, as part of the implementation of the National Transport Authority’s Cycle Network Plan for the Greater Dublin Area.</p>	<p>The proposed development, in addition to providing cycle infrastructure linkage to Kennelsfort Road Upper will provide the critical mass necessary to support the envisaged cycle infrastructure improvements in the Palmerstown area as listed in the NTA Greater Dublin Area Cycle Network Plan, namely the upgrade of the Ballyfermot Road to a secondary cycling route.</p>
<p>Co-ordination and active land management: To enhance co-ordination across local authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands.</p>	<p>The subject site is a brownfield site, comprising disused and vacant industrial warehouses. Its redevelopment as a residential scheme will represent active urban development and the development of an underutilized, brownfield, vacant site. The development of the subject site, located on in the north-west corner of the REGEN lands, closest to the District Centre of Palmerstown and existing residential development, presents an opportunity to open-up access to the less accessible REGEN lands to the east.</p>
<p>Table 5.1 of the RSES identifies the Parkwest-Cherry Orchard area as a part of the ‘City Centre within the M50’ Strategic Development Areas and Corridors. It notes the potential for regeneration of older social housing projects. It lists amongst enabling infrastructure a new DART underground stop.</p>	<p>The proposed development is located within the significant brownfield lands in the ‘City Centre within the M50’ Strategic Development Area as identified in the RSES. The proposed development would contribute towards delivering the capacity to support long-term DART underground plans.</p>
<p>Consolidation and Re-Intensification</p> <p>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</p>	<p>The proposed development site is a brownfield site within the existing built-up area, recognised and defined as ‘City Centre within the M50’ Strategic Development Area. Higher density residential development on this site can be accommodated by Irish Water and will serve to support the future BusConnects Core Bus Corridor (CBC).</p>
<p>MASP Housing and Regeneration</p> <p>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</p>	<p>The proposed residential development is of an appropriately higher density in recognition of the subject site’s location within a ‘City Centre within the M50’ Strategic Development Area. The adherence of the proposed development to the</p>

Planning System and Flood Risk Management Guidelines 2009

The 2009 guidelines (SRDUA) were developed with the objective of delivering high quality and sustainable residential developments. Palmerstown can be defined as a 'City/Larger Town' according to criteria identified in the SRDUA with a population of over 5,000 people.

Policy	Consistency
<p>Among the core objectives of the Guidelines are to:</p> <ul style="list-style-type: none"> • Avoid inappropriate development in areas at risk of flooding. • Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off. • Avoid unnecessary restriction of national, regional or local economic and social growth. <p>There are three types or levels of flood zones defined for the purposes of these Guidelines:</p> <ul style="list-style-type: none"> • Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding); • Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and • Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B. <p>Key Messages of Flooding and Development Management are:</p> <ul style="list-style-type: none"> • Planning authorities should apply the sequential approach in aiming to avoid development in areas at risk of flooding, through the development management process. • Planning applications will, where appropriate, need to be accompanied by a detailed flood risk assessment to be considered by planning authorities in determining applications. 	<p>Hayes Higgins Partnership has undertaken a preliminary review of Flood Risk for the proposed development. A review of the available sources of flooding indicates there are no instances of historic flooding on-site, and that there is no risk of future flooding on site as:</p> <ul style="list-style-type: none"> - The site is not within Flood Zone A or B. - There is no reported history of flooding on the site. - There is no risk of the site being susceptible to coastal or tidal flooding due to its inland location. - Surrounding lands slope away from the site, protecting it from off-site flooding <p>Please refer to the accompanying Civil Engineering Services Report for further detail.</p>

- Development within flood risk areas, that would be defined as inappropriate as set out in chapter 3, but which are considered to be necessary to meet the objectives of proper planning and sustainable development, will be subject to the Justification Test.
- Most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore, as more plans are reviewed and zoning reconsidered, there should be less need for development management processes to require detailed flood risk assessment.

Zone C - Low probability of flooding.

Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but would need to meet the normal range of other proper planning and sustainable development considerations.

The proposed development is located within Flood Zone C. Based on site investigations, there is no documented history of Flood Risk on the site.

Local Planning Policy

South Dublin County Council Development Plan 2016-2022

The South County Dublin Development Plan (CDP) outlines the objectives and parameters for the proper planning and sustainable development of South Dublin up to the year 2022 and beyond. The South Dublin County Area is 223 sq. kilometres and it extends from the River Liffey to the Dublin Mountains. In 2015 it was recognised there was a housing capacity shortfall of 5,355 housing units in South Dublin County Council area, to address which a further 5,849 unit capacity through sustainable intensification development on brownfield sites and infill sites. The new Regeneration zoning objective REGEN was introduced to support this development.

Policy	Consistency
<p>Core Strategy (CS): Policy 1: Consolidation Areas within the Gateway</p> <p><i>It is the policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder</i></p> <p>In the County's Settlement Strategy, as set out in Section 1 of the Plan, as amended by Variation No.4., the Palmerstown area is identified as within the Consolidation Areas within the Gateway with a total housing capacity for these areas identified as 9,620 units (ref Table 1.10).</p> <p>CS1 Objective 1: To promote and support high quality infill development.</p> <p>CS1 Objective 2: To promote and support the regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led development).</p>	<p>The subject site is located on lands zoned as REGEN, with a zoning objective 'to facilitate enterprise and/or residential led development'. The proposed development, which would consolidate and sustainably intensify development on the site, is fully in compliance with this zoning and in line with CS1 Objective 2. It represents an opportunity to start the process of regeneration along the western edge of the Cherry Orchard Industrial Estate, where it abuts Kennelsfort Road Upper and the nearby existing residential areas of Palmerstown Manor and Oakcourt. The site which is approximately 200 metres from the District Centre of Palmerstown and is in direct proximity to a number of key employment areas. It benefits from the presence of adjacent bus stops (north and south of the Kennelsfort Road Upper) as well as proximity to the North Clondalkin Quality Bus Corridor on nearby Ballyfermot Road. These provide access to a wide network of high frequency public transport. The redevelopment of this brownfield industrial site for residential use would constitute sustainable development and will act as a stimulus for the residential development of other REGEN lands in the area. It would constitute high quality infill in line with CS1 Objective 1 and contribute towards delivering the identified housing capacity of 9,620 units in the Consolidation Areas within the Gateway.</p>
<p>Section 1.6.4 states 'a new Regeneration zoning objective 'REGEN' has been introduced to support and facilitate the regeneration of underutilised industrial lands that are proximate</p>	<p>The subject site is located on the REGEN zoned lands and is identified as a housing capacity site. The proposed more intensive residential development on underutilised former industrial lands is fully in line with the Council's aspiration</p>

to town centres and/or public transport nodes for more intensive enterprise and residential led development’.

In addition to the REGEN zoning, the subject lands are identified as a housing capacity site in Section 1.6.4 of the Development Plan (ref Map 1.3).

Section 1.8.0 notes that Map 1.3 outlines the sites that have been identified as having development potential during the plan period. In terms of phasing, planning prioritisation and infrastructure delivery it is advised that:

4) Underutilised industrial lands that are close to town centres and transport nodes are designated with Zoning Objective Regeneration ‘REGEN’ (to facilitate enterprise and/or residential led regeneration). These lands are serviced and offer significant potential for more intensive employment and/or residential development and associated uses. The transition from underutilised industrial areas is likely to occur on an incremental basis and may need to be supported by an economic regeneration strategy. It is envisaged that not more than 50% of these areas will come forward for housing during the period 2016-2022.

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) H7 Objective 3: To support public realm improvements as part of infill developments

for the wider ‘Consolidation Areas within the Gateway’ area. Its redevelopment as a residential quarter may act as a stimulus for the development of other brownfield and vacant sites in the vicinity.

The site’s development potential is acknowledged in Map 1.3 of the CDP, where it is identified as a housing capacity site. In terms of phasing and prioritising, we consider that the location of the subject site adjacent to a main transport artery presents a gateway landmark opportunity, opening up access to the REGEN lands to the east. Therefore, we suggest that development on this site should come forward within the initial tranche of development on REGEN lands.

The proposed residential development has been designed in accordance with government policies notably the Urban Design Manual: A Best Practice Guide and the Apartment Guidelines for Planning Authorities 2020 in order to achieve a sustainable and high quality urban residential development.

The proposed development takes cognizance of the Guidelines on Sustainable Residential Development in Urban Areas and accompanying Urban Design Manual (refer to Section 2 of this document), which have formed the basis of the design rationale for the proposed development. The development promotes the sustainable transportation modes of walking, cycling and public transport.

The Connectivity Map included in Appendix 1 demonstrates the site’s current and future connectivity with surrounding areas. The site is located in close proximity to bus stops served by bus routes 18, 26 and within a few minutes’ walk of the Clondalkin North QBC along which the 40 and 76 routes run. In combination these bus routes provide direct connections to Dublin City Centre and a number of major employment, service and education centres.

The provision of high-quality public realm is an integral feature of the design proposal. Footpaths have been



provided to seamlessly integrate with the existing pedestrian infrastructure in the area providing connections to Palmerstown District Centre and local bus stops. The proposal also has a number of hard and soft amenity areas incorporated between the design blocks to enhance the quality of life of the future residents.

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).

H8 Objective 4:

To support proposals for more intensive enterprise and/or residential led development within areas designated with Zoning Objective 'REGEN' (To facilitate enterprise and/or residential led regeneration), subject to appropriate design safeguards and based on traditional urban forms that adhere to urban design criteria.

The provision of high-density development at this zoned REGEN site is deemed acceptable primarily due to its proximity to Palmerstown District Centre and its proximity to several high frequency bus stops which provide connections to key employment centres namely Dublin City Centre Liffey Valley Shopping Centre, Tallaght, Ballyfermot and Chapelizod. BusConnects proposals will expand this connectivity further.

The plot ratio of 2.13 is appropriate to the site given its location.

Housing (H) 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 H9 Objective 4: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town

The proposed development site is considered appropriate for increased scale given its strong connectivity and central and/or accessible location. The subject site is in close proximity to the District Centre at Palmerstown and well positioned to capitalize on various bus and sustainable transport options in the area.

The increase in building height on the site has been considered in detail having regard to its immediate context. The height of the development will be graduated from 1 (including under podium accommodation) to 9 storeys. Significant public realm works are proposed to the west and south of the scheme to provide definition and anchor the proposal into the local context.

A prominent site, the proposal will improve legibility in the local area creating new identify at the start of the regeneration area by introducing high-quality

Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.

Section 5.1.5 of the Development Plan states that varied building heights are supported in urban centres and regeneration zones and will be important in creating a sense of place, urban legibility and visual diversity. Tall buildings that exceed five storeys will be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones based on approved Local Area Plans or SDZ Planning Schemes.

contemporary elevations and treatments. The development will provide active frontage onto Kennelsfort Road Upper thus providing passive surveillance and improving night-time safety.

The proposals provide for a new formal and active living edge on Kennelsfort Road Upper complete with dedicated cycle lane, green buffer setback and a mix of live uses including a range of communal areas. The operational development will also contribute to placemaking via the development of a number of communal and publicly accessible amenity spaces including a playground.

Based on the highly accessible nature of this location and position within the defined 'City Centre within the M50' Strategic Development Area' which are deemed a 'cornerstone of delivering the wider strategic and national policy of compact growth'¹, we consider the subject site represents a gateway landmark opportunity in the REGEN lands to the East and is an appropriate location for taller buildings.

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.

National policy is supportive of development where it is recognised that it contributes to the widening of housing mix in urban communities. The Sustainable Urban Housing: Design Standards for New Apartments guidelines were published in recognition that apartment design is constantly changing and there is a need to respond to best practice. The proposed development is in line with the requirements of SPPR 1 in relation to housing mix, in that not more than 50% of the total units are one-bedroom apartments.

Housing (H) Residential Design and Layout

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.

H11 Objective 2:

To promote new residential developments taking account of energy efficiency, prioritising passive house construction standards, as well as renewable energy opportunities, including

As identified previously (Section 2), the proposed development has had full regard for the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual. A comprehensive Design Statement prepared by ShipseyBarry Architects accompanies this submission which addresses the proposed development's compliance with the 12 design principles in the Urban Design Manual.

All windows in the residential apartment block will be triple glazed in order to optimize energy efficiency within

¹ Page 7 South Dublin County Council Opinion

solar energy where appropriate, in accordance with Part L of the Building Regulations.

Housing (H) Policy 12

Public Open Space

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

H12 Objective 1:

To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).

H12 Objective 2:

To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.

Section 11.3.1: (iii) Public Open Space/ Children’s Play

All new residential developments shall be required to incorporate a minimum of 10% of the total site area as public open space

Housing (H) Policy 13 Private and Semi-Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (inc. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

H13 Objective 1:

To ensure that all private open spaces for apartments and duplexes including balconies, patios and roof gardens are designed in accordance with the qualitative and quantitative standards (including minimum balcony size and depth) set out under Sustainable Urban Housing: Design Standards for New Apartments, DECLG (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide, DEHLG (2009).

H13 Objective 2:

To ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of

the development. The design includes roof mounted solar panels and will be serviced by renewable energy.

The proposed development has been designed in accordance with the Council’s policies towards public spaces and amenities. Chapter 11 of the South County Dublin’s Development Plan recommends that 10% of any new residential development should be incorporated into the creation of public open space. As outlined in the accompanying Context and Public Space Strategy prepared by Ilsa Rutger Landscape Architecture, of the total site area, 16% of the site is dedicated to public open space, which is in excess of the 10% minimum requirement. A further 15% of the site area has been designed as a semi-private open space in the form of a centrally located podium, which is publicly accessible from several access points throughout the development. The semi-private landscaped podium incorporates a mix of hard and soft landscape materials which acts as a focal point within the development. It is envisaged to be an area where people can converge and mingle, with a children’s play area located within. These open space areas are sited where they will be overlooked, increasing their safety and ensuring that they positively contribute to the amenity of the proposed scheme.

The hierarchy of open space, including delineation of private, semi-private and public open space is clearly defined in the submitted landscape plans. This is satisfied in full. Please refer to the submitted landscape plans.

All apartments will be provided with private amenity space in the form of balconies or terraces which meet and in the majority of cases exceed the minimum required floor area for private amenity space as listed in the 2020 apartment guidelines. All apartments also have access to the semi-private communal podium garden and public amenity areas which exceed the standard requirements.

active and passive uses, in accordance with the quantitative standards set out in Chapter 11 Implementation.

Housing (H) Policy 14 Internal Residential Accommodation

It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

H14 Objective 1:

To ensure that all residential units and residential buildings are designed in accordance with the relevant quantitative standards, qualitative standards and recommendations contained in Sustainable Urban Housing: Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual and have regard to the standards and targets contained in Quality Housing for Sustainable Communities (2007), particularly the standards and recommendations that relate to internal amenity/layout, overall unit size, internal room sizes, room dimensions, aspect, sound insulation, communal facilities, storage, sustainability and energy efficiency.

As outlined in the accompanying schedule of accommodation prepared by ShipseyBarry, all of the apartments to be provided within the scheme are in excess of the minimum required floor areas. The proposed development meets all quantitative and qualitative standards and will provide for a high standard of accommodation.

All units within the proposed scheme meet key defined criteria under Ministerial Guidance, including the 2020 Apartment Guideline requirements in terms of private and communal amenity provision, size, layout, aspect, sound insulation, storage, sustainability, and efficiency.

Housing (H) Policy 15 Privacy and Security

H15 Objective 1:

To ensure that there is a clear definition between private, semi-private and public open space that serves residential development

H15 Objective 2:

To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and spaces.

H15 Objective 3:

To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.

H15 Objective 4:

To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity

The design scheme creates a clear definition and an easily read hierarchy of the private, semi-private and public open spaces that serve the residential development. The provision of public realm and public open space is an integral element of the design. The podium garden is a focal point of the design with the majority of apartments facing towards it, creating active street frontage and passive surveillance of the courtyard garden.

The proposals provide for a new formal and active living edge on Kennelsfort Road Upper complete with dedicated cycle lane, green buffer setback and a mix of live uses including a range of communal areas.

All balconies are recessed, and all windows are triple glazed and appropriately positioned to prevent overlooking and safeguard the privacy of the residents.

Transport and Mobility (TM) Policy 2 Public Transport

It is the policy of the Council to promote the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network and to ensure existing and planned public transport services provide an attractive and convenient alternative to the car.

TM 2 Objective 3:

Appropriate density targets for this site, at a Central and Accessible Location, will be met to support efficient public transport in the context of the sites zoning. The proposed plot ratio at 2.13 will ensure that the lands are developed in a sustainable way and will support the existing high frequency bus routes already present in the area and planned future enhancements under BusConnects.

To generate additional demand for public transport services through integrated land use planning and maximizing access to existing and planned public transport services throughout the network.

Transport and Mobility (TM) Policy 3 Walking and Cycling

It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.

TM Objective 2:

To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities

TM Objective 3:

To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists within a safe and comfortable environment for a wide range of ages, abilities and journey types.

TM Objective 4:

To prioritise the upgrade of footpaths, public lighting & public realm maintenance and supporting signage on public roads/paths where a demonstrated need exists for busy routes used by runners & walkers.

Transport and Mobility (TM) Policy 7 Car Parking

TM7 Objective 1:

To carefully consider the number of parking spaces provided to service the needs of new development.

TM7 Objective 3:

To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape. Table 11.24: Maximum Parking Standards (Residential Development)

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1	ZONE 2
Apartment	1 Bed	1 space	0.75 space
	2 bed	1.25 space	1 space
	3 bed+	1.5 spaces	1.25 space
House	1 Bed	1 space	1 space
	2 Bed	1.5 space	1.25
	3+ bed	2 space	1.5

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum

The proposed scheme through its density and scale aims to provide efficiencies in terms of land use and to ensure the viability of current and future public transport infrastructure including the planned improvements in cycling infrastructure along Ballyfermot Road.

The provision of car parking below maximum levels is aimed at reducing car ownership within the scheme encouraging people to utilise the significant existing and proposed walking, cycling and public transport linkages adjacent to the site.

User-friendly public amenity areas, in the form of the centralised podium garden and natural green buffer areas, render the site a walkable, interconnected space. This in conjunction with the proposed improvements to public realm along the southern boundary and entrance off Cherry Orchard Industrial Estate Road and the western boundary along Kennelsfort Road Upper including a cycle lane, encourages walking and cycling as the dominate form of travel within and surrounding the site. The access road along the eastern boundary provides an opportunity for extension into the future development of REGEN lands to the east for vehicular access, with pedestrian access to the podium from the east establishing a vector for future pedestrian permeability.

The proposal delivers 52% of the maximum amount of car parking allowed on site, further detailed below, which in the application will include EV charging points and spaces for the mobility impaired to the quantum required in the County Development Plan. Due to the highly sustainable location of the site and its proximity to high quality public transport and local services, it is considered that proposed car parking on-site will adequately provide for future residents.

Under podium parking is proposed, with surface parking limited to include 2 no. go-car spaces. This will ensure the safe movement of cyclists and pedestrians and will not degrade the overall attractiveness and appearance of the proposed development.

The Development Plan sets out the maximum number

provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

- The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),
- The proximity of the development to services that fulfil occasional and day to day needs,
- The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,
- The ability of people to fulfil multiple needs in a single journey,
- The levels of car dependency generated by particular uses within the development,
- The ability of residents to live in close proximity to the workplace,
- Peak hours of demand and the ability to share spaces between different uses,
- Uses for which parking rates can be accumulated, and
- The ability of the surrounding road network to cater for an increase in traffic.

of parking spaces in table 11.24. As per this table, the maximum amount of car parking to be provided on site (the development being within Zone 2) is 126 car parking spaces.

The proposed development will provide 52% of this maximum figure through the provision of 65 car parking spaces, alongside 310 resident and visitor bike parking spaces (serving 72 no. 1-bedroom apartments, and 72 no. 2-bedroom apartments).

Proposed car parking within the development is consistent with a recently permitted development at Walkinstown, Dublin (ABP-309658-21). The permitted development at Walkinstown provided 43% of the maximum car parking figure for the site which was deemed appropriate. (65 car parking spaces, serving 1 no. studio apartments, 59 no. 1-bedroom apartments, 96 no. 2-bedroom apartments and 7 no. 3-bedroom apartments, within Zone 2).

The proposed development will provide car parking at a higher rate (52%) than what has been recently permitted (43%) in proximity to the site.

Given the proximity of the site to high quality public transport as well as services that fulfil occasional and day-to-day needs, such as the Palmerstown District Centre, we consider this mix will both adequately and appropriately address future resident's needs, in line with South Dublin County Council Development Plan standards.

Chapter 8 Green Infrastructure Policy 2 Green Infrastructure Network G2 Objective 6:

To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries, and increase hedgerow coverage using locally native species.

GREEN INFRASTRUCTURE (G) Policy 6 New Development in Urban Areas

G6 Objective 1:

To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

G6 Objective 2:

To require new development to provide links into the wider Green Infrastructure network, in particular where similar features exist on adjoining sites.

The policies in the Development Plan recognize the importance of establishing and maintaining an interconnected network of green Infrastructure throughout urban areas. As outlined in the accompanying Landscape Design Strategy prepared by Ilsa Rutger Landscape Architecture it is proposed to retain the existing trees and the augment them with new planting along the southern boundary. This is pivotal to the design, with the aim of creating an enhanced streetscape with a much greener, improved pedestrian and cyclist experience.

Along the Kennelsfort Road Upper boundary, to the west of the site, it is proposed to introduce new trees, underplanted with grasses and evergreen shrubs, to create a natural green buffer. We consider these proposals are in line with G2 Objective 6, G2 Objective 1 and G2 Objective 2.

Chapter 11: Implementation

Section 11.2.1: Design Statements

All medium to large scale development proposals (10 dwellings and above and/or commercial, retail or community developments of 1,000sq. metres and above, or as otherwise required), shall be accompanied by a Design Statement. The Design Statement should consist of:

- A Site Analysis
- A Concept Plan and/or Masterplan
- A statement based on the design criteria set out in the relevant National Planning Guidance documents listed in Section 11.2.0 and/or tables 11.17 and 11.18 as outlined below.
- A statement or Quality Audit addressing street design as outlined within the Design Manual for Urban Roads and Streets.

This application is accompanied by a detailed Design Statement produced by ShipseyBarry, which includes a thorough examination of the site context and addresses the relevant design criteria set out in the Urban Design Manual and in Table 11.7 of the South County Dublin Development Plan. The accompanying TIA contains a DMURS statement.

Section 11.2.7: Building Heights

Varied building heights are supported across residential areas, urban centres and regeneration zones in South Dublin County, subject to appropriate safeguards to protect the amenity of the area.

Development proposals that include 'higher buildings' that are greater than the prevailing building height in the area should be supported by a strong urban design rationale (as part of a Design Statement) and provide an appropriate series of measures that promote the transition to a higher building.

Proposals for higher buildings of over three storeys in residential areas should be accompanied by a site analysis (including character appraisal) and statement that addresses the impact of the development (see also Section 11.2.1 – Design Statements).

The appropriate maximum or minimum height of any building will be determined by:

- The prevailing building height in the surrounding area.
- The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved.
- The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space.
- The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development.

Proposals for 'tall buildings', that exceed five storeys will only be considered at areas of strategic planning importance such as key nodes, along the main street network and along principal open spaces in Town Centres, Regeneration zones and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

We consider that the subject site meets the definition of a gateway site in a Regeneration area and is an appropriate location for increased height having regard to Section 11.2.7 of the Plan, and more specifically the Ministerial Guidelines on building heights. See accompanying Statement of Material Contravention prepare by HW Planning.

Section 11.3.1: Residential(iv): Dwelling Standards

All apartments must accord with or exceed the open space and floor area standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2015) and the minimum floor areas set out in Table 11.21.

An apartment refers to a dwelling unit that is not a house and may comprise an apartment or duplex unit.

Table 11.21: Minimum Space Standards for Apartments

TYPE OF UNIT	APARTMENTS	PRIVATE OPEN SPACE	COMMUNAL OPEN SPACE	STORAGE
Studio	40 sq.m	4 sq.m	4 sq.m	3 sq.m
One Bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two Bedroom	73 sq.m	7 sq.m	7sq.m	6 sq.m
Three Bedrooms	90 sq.m	9 sq.m	9 sq.m	9 sq.m

As outlined in the Qualitative Assessment in the accompanying Design Statement prepared by ShipseyBarry Architects, all of the apartments to be provided within the scheme meet or are in excess of the minimum required floor areas, storage, private and communal amenity space.

Section 11.3.1: Residential (v): Privacy

Section 10 of the Urban Design Manual (2009) addresses privacy and amenity. A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy. Dwellings with direct street frontage should generally include a privacy strip of at least 1 metre or a front garden.

In accordance with the Development Plan standards, separation distances in excess of 22m have been obtained between the proposed development and the existing dwellings to the west of the site. Communal areas and facilities (e.g. gym, lounge areas, meeting room, lobby with concierge service area, remote working spaces and an activity area) occupy the ground floor along the southern elevation where there is direct street frontage. In addition, generous set-backs have been incorporated, with natural green buffers separating the development from the roads along the southern and western boundary. Within the scheme, green planted screens are proposed between private patios and the communal courtyard and clever architectural treatments have been adopted to ensure there is no potential for overlooking.

See accompanying Statement of Material Contravention prepared by HW Planning for further detail.

Section 11.3.1: Residential (vi): Dual aspect ratios in apartment schemes shall be provided in accordance with Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2015).

The proposed scheme achieves dual aspect in 58% of the proposed units (refer to the accompanying Aspect Ratio drawing produced by Shipset Barry. This exceeds the 33% minimum requirement for central/ accessible locations as outlined in the 2020 apartment guidelines.

Community Infrastructure (C) Policy 8- Childcare Facilities

Policy C8 (a):

It is the policy of the Council to support and facilitate the provision of good quality and accessible childcare facilities at suitable locations in the County.

Policy C8 (b):

It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.

Having regard to the 2020 Apartment Guidelines, it is considered that the 72 no. 2-bedroom apartments fall below the 75-unit threshold that would typically trigger the requirement for a 20 no. child place creche. Within this, the guidelines readily acknowledge that not all 2-bed units will reasonably give rise to childcare demand.

Given the nature of the development, it is envisaged that the resident profile will be predominantly young professionals and with a smaller than average proportion

C8 Objective 1;

To support and facilitate the provision of childcare infrastructure at suitable locations such as towns, village, district and local centres, adjacent to school sites and in employment areas.

C8 Objective 2:

To require childcare infrastructure to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans or approved Planning schemes.

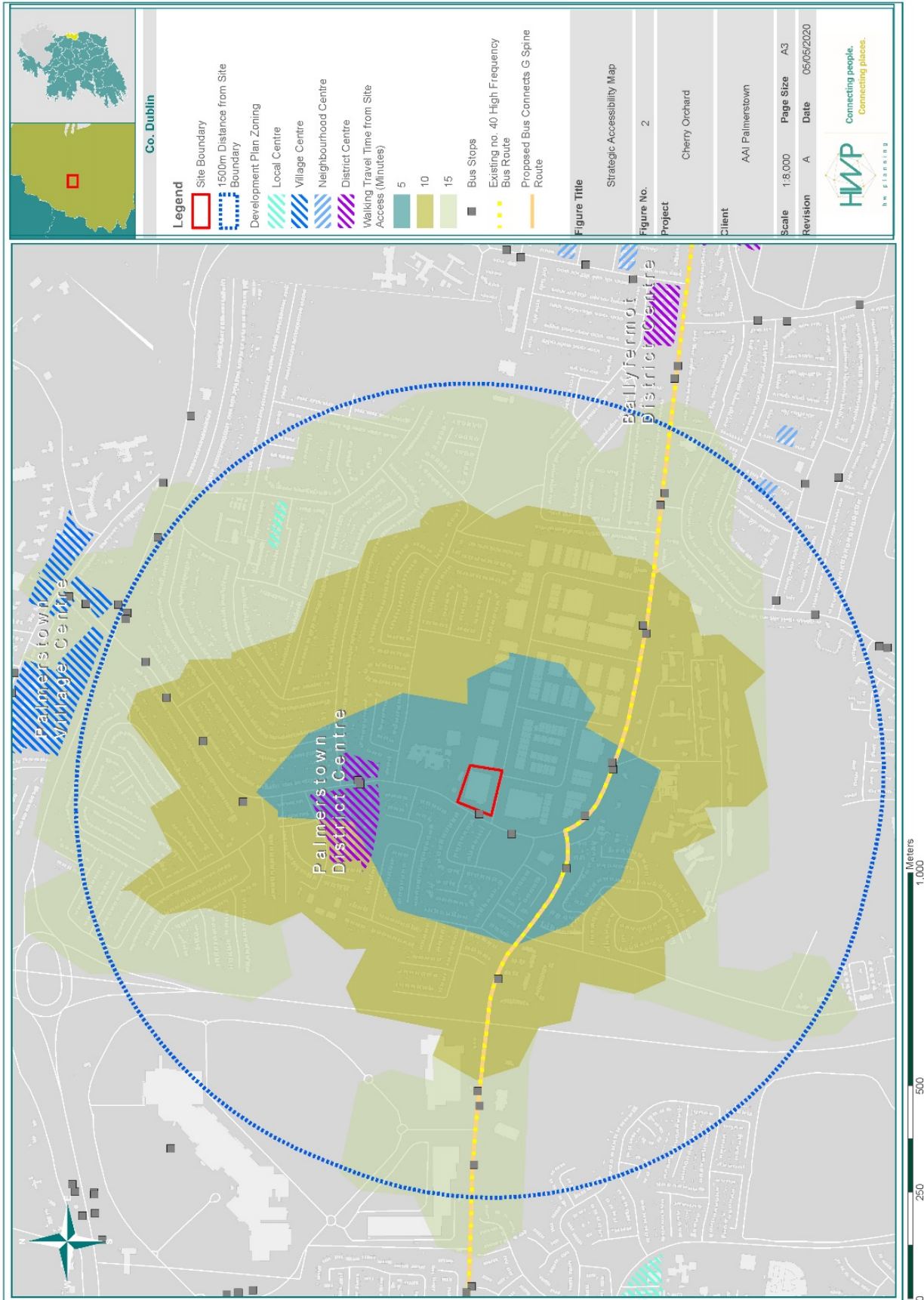
of families, as is reflected in the existing population profile of the area. Based on a review of the capacity in existing childcare facilities in the vicinity, there is sufficient additional capacity to cater for any childcare demand arising for the proposed scheme.

IE3 Objective 3:

To manage flood risk in the County in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014), in particular when preparing plans and programmes and assessing development proposals.

For lands identified as being at risk of flooding in (but not limited to) the Strategic Flood Risk Assessment, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these Guidelines, paying particular attention to residual flood risks and any proposed site specific flood management measures.

Section 6 of the accompanying Engineering Services Report prepared by HHP concludes that there is no material risk of flooding at the subject site.



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