
Statement of Consistency & Planning Report

Residential Development

Dolcain House, Monastery Road, Clondalkin, Dublin 22

Randelswood Holdings Ltd.

January 2022



Hughes Planning & Development Consultants

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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, on behalf of our clients Randelswood Holdings Ltd. have prepared this planning statement of consistency and planning report to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands located at Dolcain House, Monastery Road, Clondalkin, Dublin 22. More specifically, the proposed Strategic Housing Development comprises the change of use and modification to the existing commercial blocks on-site, referred to as Blocks A, B and C for the purposes of this application, to provide for a total of 101 no. apartment units. The proposed scheme also provides for the construction of a new residential block, Block D, which will comprise a total of 29 no. apartment units with the overall scheme providing for a total of 130 no. residential apartments. A full description of the proposed development is provided in turn below:

The proposed development will consist of: -

(i) Demolition of existing single storey shed (15.7sq.m), esb sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site; (ii) Change of use of the existing Blocks A, B and C at Dolcain House from office use to residential use which range in height from 4-5 storeys over basement, together with modifications to the existing blocks; (iii) alterations to the existing Blocks A, B and C will include the removal of the existing fourth floor level and replacement with a new fourth floor level at Block A only, the provision of an additional floor level to all blocks with 2 no. setback floors proposed to the atrium to now provide for a height of 4-5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments; (iv) alterations to Block A to include a 5 storey extension to northern elevation; (v) alterations to Block B include the demolition of the existing single storey element on the eastern façade (73.2sq.m) which comprises a kitchen area, office and storage space, the demolition of the existing three-storey connection between Blocks B and C (23sq.m) and the relocation of the existing telecommunications mast equipment at roof level; (vi) construction of a new 6-storey Block D to the east of Block B to accommodate 29 no. apartment units. The proposed alterations and modifications to the existing Blocks A, B and C and the proposed Block D will accommodate a total of 130 no. apartment units (comprising 61 no. one-bedroom apartments, 59 no. two-bedroom apartments and 10 no. three-bedroom apartments, as follows:-

- *Block A (including atrium) will comprise 50 no. apartments (consisting of 22 no. one-bedroom apartments, 22 no. two-bedroom apartments and 6 no. three-bedroom apartments) and will range in height from 4-5 to 6 storeys over basement level;*
- *Block B will comprise 22 no. apartments (consisting of 9 no. one-bedroom apartments, 9 no. two-bedroom apartments and 4 no. three-bedroom apartments) and will be 5 storeys in height;*
- *Block C will comprise 29 no. apartments (consisting of 13 no. one-bedroom apartments, and 16 no. two-bedroom apartments) and will be 6 storeys in height; and,*
- *Block D will comprise 29 no. apartments (consisting of 17 no. one-bedroom apartments, and 12 no. two-bedroom apartments and will be 6 storeys in height.*

The proposed development will be served by communal residential amenities/facilities at surface and basement level, including communal open space and outdoor areas at surface level; 310 no. bicycle parking spaces (254 no. at basement level and 56 no. at surface level); 78 no. car-parking spaces (62 no. at basement level and 16 no. surface level) including 5 no. car-club spaces and 3 no. accessible parking spaces and; 4 no. motorcycle parking spaces at basement level. The basement level also comprises a proposed bin storage area and plant room. The proposed development also includes landscaping, a pedestrian and cyclist access onto the adjacent Monastery Road to the north; and internal pedestrian and shared surfaces. (vii) Vehicular access to the development is proposed

through the existing access/entrance to Dolcain House to the east. The application is accompanied by 2 no. site layout options, Option A and B. Option A includes a new public pedestrian footpath along the southern side of Monastery Road which extends east to the north-eastern application site boundary to facilitate a connection to future footpath. Option B provides for the omission of this footpath. (viii) Associated site and infrastructural works are also proposed which include; foul and surface water drainage; plant areas; ESB substation; and all associated site development works necessary to facilitate the proposed development.

The purpose of this report is to provide background information in respect of the site, a description of the proposed development, the planning rationale and justification for the proposed development having regard to the South Dublin County Council Development Plan 2016-2022 and Regional/National policy guidance and the required information set out in the associated Strategic Housing Development Application Form. This report has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017.

The subject application has been prepared having regard to the feedback received from An Bord Pleanála and South Dublin County Council during pre-planning consultations and the South Dublin County Development Plan 2016-2022. This report should be read in conjunction with the following reports/plans:

Report/Documentation	Consultant
Architectural Drawings, Design Statement and HQA	HA Design Studio
CGI Images	Digital Dimensions
Daylight and Sunlight Assessment Report	Digital Dimensions
Screening Report for Appropriate Assessment	Altamar Environmental Consultants
Bat Survey Report	Altamar Environmental Consultants
Ecological Impact Assessment	Altamar Environmental Consultants
Landscape Masterplan & Landscape Design Statement	Jane McCorkell Landscape Architects
Stage 1/2 Flood Risk Assessment Report	Lohan & Donnelly Consulting Engineers
Engineering Services Report and Engineering Drawings	Lohan & Donnelly Consulting Engineers
Outline Construction Management Plan Report	Lohan & Donnelly Consulting Engineers
Outline Construction and Demolition Waste Management Plan	Lohan & Donnelly Consulting Engineers
DMURS Compliance Statement	Lohan & Donnelly Consulting Engineers
Traffic and Transportation Assessment	Martin Rodgers Consulting Ltd. & Lohan & Donnelly Consulting Engineers
Parking and Mobility Management Plan	Martin Rodgers Consulting Ltd. & Lohan & Donnelly Consulting Engineers
Pedestrian Desire Lines Report	Martin Rodgers Consulting Ltd. & Lohan & Donnelly Consulting Engineers
Movement Safety Audit	Bruton Consulting Engineers
Arboricultural Report and Associated Drawings	Charles McCorkell, Arboricultural Consultancy
Archaeological Impact Assessment	Archer Heritage Planning
Acoustic Review	Dalton Acoustics Ltd.
Public Lighting Drawings and Report	Fallon Design M&E Engineering
M&E Sustainability & Energy Report	Fallon Design M&E Engineering
Air Quality Assessment Report	AWN
Regulation 299B Statement	AWN
Environmental Impact Assessment Screening Report	AWN
Operational Waste Management Plan	AWN

As above noted, the proposed development is to provide for a high-quality residential scheme at an appropriate location whilst having due regard for the character and existing built context of the surrounding area, as well as the amenity of adjacent properties. It is submitted that the proposal accords

with the proper planning and sustainable development of the area and will facilitate the provision of much needed additional residential units at an accessible and central location.

2.0 Site Location and Description

The subject site is situated on the southern site of Monastery Road, approximately 780 metres to the west of junction 9 of the M50 and c. 400 metres to the north of the N7, and comprises a parcel of land located at Dolcain House, Monastery Road, Clondalkin, Dublin 22. The site comprises of an area of approximately 0.81 ha (2.00 acres) and comprises 3 no. office buildings, an atrium, surface parking and a basement car park. The existing building located on site range in height from 4 to 5 storeys.

Adjacent to the north of the site is a 'Protected Structure 427', known as Mount St. Joseph's Graveyard which consists of a graveyard and remains of a monastery. Separating the site from this structure is Monastery Road located at the north of the site. The Round Tower GAA Club pitches to the south-west and an asphalt production company to the south-east also border the site. The site is located within an area comprising mostly of residential which lies to the north and west of the site, and some industrial activities immediately south-east of the site. There is currently no footpath or cycle lanes at the located towards the north of the site as it adjoins Monastery Road.

Clondalkin town centre is located about 780 metres to the west of the site. The town has grown in recent years with the Clondalkin townland population having increased by 612 between 2011 and 2016 to a total population of 8804 according to the 2016 Census. The town is vibrant providing a variety of amenities and activities such as schools, shops, cafes, offices and cultural centres due to the historic nature of the town. Under current South Dublin County Development Plan 2016-2022 zoning objectives, the site is zoned under 'Objective RES, the primary objective of which is *'To protect and/or improve residential amenity'*. In this regard, it is considered that the proposed development to provide for additional residential accommodation, is appropriate in the context of the sites zoning objective.



Figure 1.0 Aerial image demonstrating the immediate location context of the subject site (outlined in red).

A strong feature of the site is its transport connectivity both private and public. The Red Cow LUAS Park and Ride facility provides parking for a total of 727 vehicles, although situated 820 metres south-east of the site, the Red Cow LUAS stop is accessible by foot offering a high frequency service with links to Tallaght Hospital, Citywest, and Dublin City Centre where passengers have the opportunity to use Heuston Station, Connolly Station and to switch to the Cross City LUAS service expanding connections to Cabra and Cherrywood. A number of bus routes use the Red Cow Luas as a transport hub with Dublin Coach providing services to Dublin Airport, Dundrum, Naas, Portlaoise, Cork, Waterford

and Limerick. The site is served also by Dublin Bus routes: 51X, 13, 68 and 69 with the latter two having stops immediately north of the site.



Figure 2.0 Aerial image showing the site (outlined in red) in the locational context of the wider area



Figure 3.0 Aerial image indicating the subject site (red star), in the context of the surrounding public transport services



Figure 4.0 Existing view of current commercial blocks on site from Monastery Road to the north



Figure 5.0 Existing view of office blocks from Monastery Road and Woodford Hill looking west

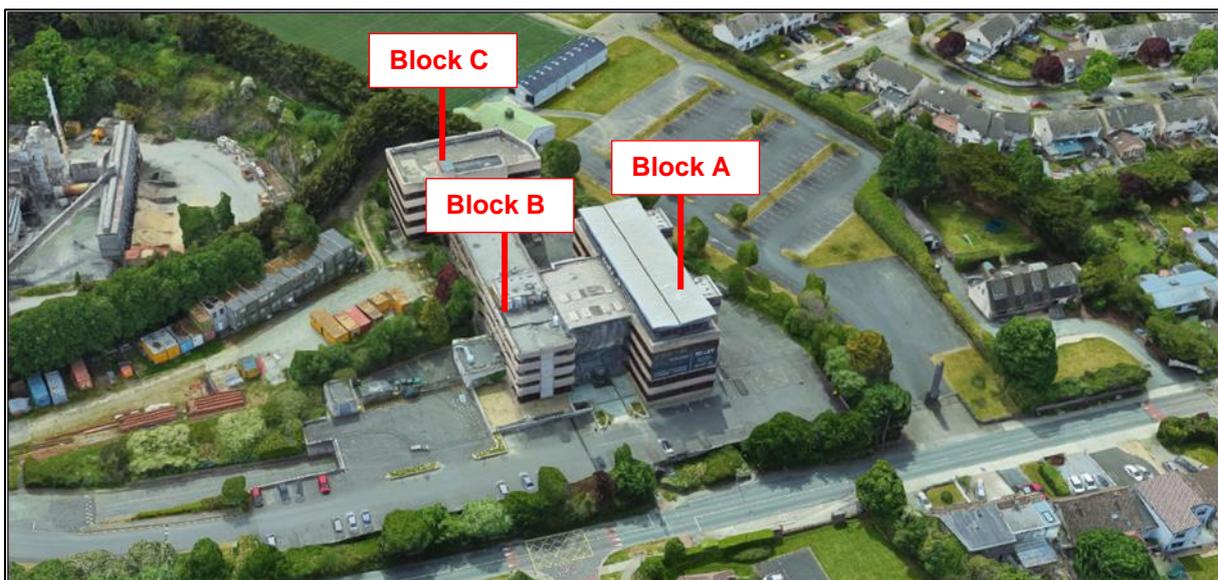


Figure 6.0 3D aerial view of the subject site looking south

3.0 Pre-planning Consultations

3.1 Initial Consultation with South Dublin County Council

We note that an initial scheme was submitted to South Dublin County Council by the Planning Agents, Hughes Planning and Development Consultants on 21st March 2021, as part of a formal Section 247 Pre-Planning meeting request, which outlined our client's preliminary concept for development and further demonstrating the revisions that were undertaken following the previous refusals issued by South Dublin County Council and An Bord Pleanála in respect of the existing properties on site which will be discussed in greater detail in the preceding sections of this report. A formal Section 247 meeting was subsequently held on 20th April 2021, following the issuance of this request. The key points of this initial consultation are discussed below.

Meeting No. 1 (Ref. No. SHD1SPP004/21)

Date: 20th April 2020

Attendees: South Dublin County Council Representatives:

Tracy McGibbon – South Dublin County Council (Senior Executive Planner)
Donal Farrelly – South Dublin County Council, Planner (Executive Planner)
Fionnuala Collins – South Dublin County Council (Public Realm)
Brian Harkin – South Dublin County Council (Services and Drainage)
Ronan Toft – South Dublin County Council (Services and Drainage)
Graham Murphy – South Dublin County Council (Roads Department)
Aws Taki – South Dublin County Council (Roads Department)
Yasir Khan – South Dublin County Council (Roads Department)

Project Team:

Mary McGrath (Client Group),
Anne McElligott – Hughes Planning and Development Consultants
Danielle O'Leary – Hughes Planning and Development Consultant,
Justin Halpin – HA Design Studio
Dominica Musolino - HA Design Studio
Sinead Hickey – Jane McCorkell Landscape Architects
Francis Wade – Lohan & Donnelly Consulting Engineers

The formal meeting revolved around a pre-planning pack circulated prior to the meeting. HA Design Studio and Hughes Planning gave an initial presentation on the proposed development, highlighting the key elements of the proposed scheme as well as a discussion in respect of the site context, the applicable zoning objective and the planning policy context relevant to the site.

The proposal tabled at this meeting can be described as follows:

Change of use of the existing office use at Blocks A, B and C and the construction of a new Block D with the blocks ranging in height from 4/5 - 6 storeys over basement providing for a total of 126 residential apartment units comprising 58 x one beds, 64 x2 bed units and 4 x3 bed units as follows: Block A - 6 Storeys in height comprising 50 apartments (22 x1 beds, 28 x2 beds); Block B - 4/5 Storeys in height comprising 22 apartments (9 x1 beds, 9 x2 beds and 4 x3 beds); Block C – 5 storeys in height comprising 25 apartments (10 x1 beds, 15 x2 beds); and, Block D - 6 storeys in height comprising 29 apartments (17 x1 beds, 12 x2 beds).

The proposed development provides for 126 parking spaces (68 spaces at basement level and 58 at surface level), 210 bikes spaces (184 spaces at basement level and 26 at surface level) with bin storage and plant room also proposed at basement level. Proposal also includes open space, landscaping, new pedestrian and cyclist link onto Monastery Road, utilisation of existing access/entrance, engineering proposals and all associated site works necessary to facilitate the development.



Figure 7.0 Indicative site layout with ground floor plan of the proposed development tabled at the formal S.247 meeting with South Dublin County Council on 20th April 2021.

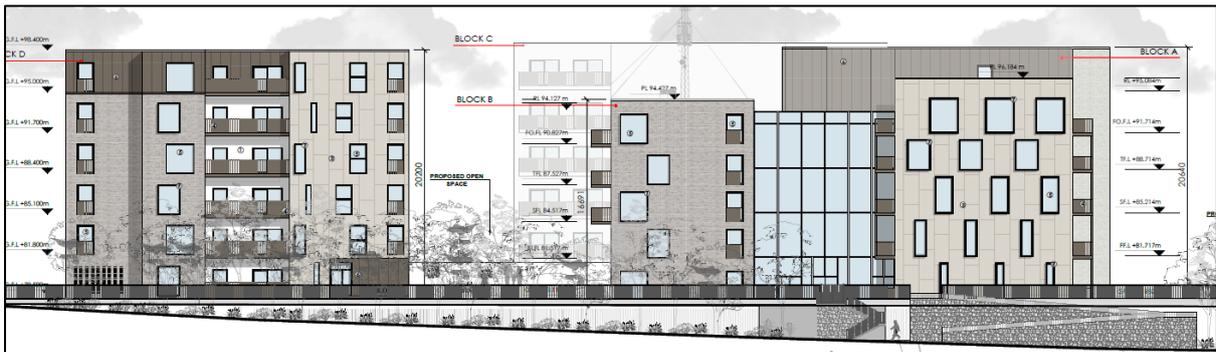


Figure 8.0 Proposed contiguous elevation as presented at the formal S. 247 meeting with South Dublin County Council on 20th April 2021



Figure 9.0 3D drawing illustrating the massing of the proposed blocks across the site tabled at the formal S. 247 meeting with South Dublin County Council on 20th April 2021.



Figure 10.0 3D drawing of the proposed of the proposed development illustrating the varying building heights proposed across the site tabled S.247 meeting with South Dublin County Council on 20th April 2021

The formal meeting notes are included at Appendix A. In general, the Planning Authority were supportive of the principle of the re-development of the subject site, including the proposed height, massing and finishing materials. The following main meeting notes/points of discussion from this meeting were as follows:

Planning

- It was noted by the Planning Authority that the proposed density would need to be justified in the context of the surrounding public transport availability (i.e. Luas and Bus links);
- It was highlighted by the Roads Department of South Dublin County Council that the scheme as presented at the pre-planning meeting did not provide for a footpath along the northern boundary and that this would need to be further investigated by the project design team.
- SDCC indicated that the proposal will result in the removal of existing sections of hedgerow and trees and stated that a net gain of vegetation would be required.
- The Planning Authority questioned whether a blue line boundary would need to be delineated on the proposed drawings and noted that the wayleave is indicated for access purposes to the red

line boundary. It was confirmed that these details would need to be included in the planning submission.

- The Roads Department suggested that the paving/material on the internal street network would need to be changed once entering the site.
- The Council noted the existing site constraints, specifically in respect of the existing hard surfacing and noted that the project design should look to soften same.
- The Planning Department noted that the height of the development is in excess of 5-storeys which is provided within the County Development Plan and therefore the building heights proposed need to be justified in line with the contents of the Urban Development and Building Heights Guidelines (2018).
- It was considered by the Council that the north-eastern area of open space presents as incidental open space and should not be included as open space.

Water Services

- It was noted by SDCC Engineers that the pre-application submission would require commentary on any flooding related issues pertaining to the site.
- It was also recommended that application documentation should clarify what existing services are available on-site and include appropriate set-backs. It was also highlighted that the scheme should incorporate as much natural attenuation as possible.
- SDCC stated that a petrol inceptor if required should be included and this should be confirmed with SDCC.
- In respect of the proposed concrete underground storage tanks. SDCC noted that this option was not a preference and that overground storage should be considered. It was further noted that the soil type in the vicinity of the site is soil type 5, and that a strong justification would be required in this regard.
- SDCC Engineers highlighted that suitable setback distances from surface water storage systems would need to be adopted.

Access, Parking and Transport

- SDCC Engineers highlighted that mitigation would need to be included for traffic and intensification of use and that the design should justify how pedestrians won't use the vehicular access.
- SDCC further indicated that Autotracking would be required to assess vehicular movements on site.
- It was noted that the proposed development as presented to SDCC provides for a total of 106 no. car parking spaces, which would be the maximum allowed, a justification would be required to increase the car parking provision beyond this point.
- The Roads Department highlighted that a 6m distance behind parking spaces in underground car parking would need to be provided.
- In respect of the proposed bicycle parking the council indicated that the quantum of spaces provided is appropriate and that any bicycle parking areas at surface level would need to be sheltered.
- It was also noted that a Mobility Management Plan and Transport Assessment would be required to support any forthcoming application as well as a lighting plan.

- The Roads Department noted that for other proposals in the vicinity, footpaths have been provided along Monastery Road and this should be included in the submission to An Bord Pleanála. Any surfaces which are to be taken in charge by SDCC are to be of appropriate standards.
- The Roads Department recommended that the proposed scheme should allow space for a footpath to connect to the roundabout along the northern boundary and possibly on the internal layout leading to future and current developments.

Public Realm

- It was noted by the Planning Authority that the car parking area at surface level needs to be broken up with landscaping. Every 5-6 spaces should be separated with appropriate landscaping.
- SDCC suggested that the impact of the proposal on existing hedgerows on the site boundary and that a survey impact assessment and protection plan would be required indicating how this will be protected during construction and will mitigate losses. It was also provided that a Bat Survey would be required.
- The Council noted that the proposed SuDS are welcomed and that more natural SuDs and drainage features would be welcomed features to avoid tanks.
- It was recommended that the proposed planting should incorporate native and pollinator friendly plant species. It was concluded that the project Landscape Architect would liaise directly with the Parks Department.

Tracy McGibbon sought confirmation that another S.247 pre-planning meeting would not be required. Justin Halpin of Ha Design Studio confirmed that the design team would proceed to submit the pre-application to An Bord Pleanála. It was agreed that further consultation with Engineering, Roads and Parks Departments would occur separate to the formal meeting.

In response to the feedback received at the pre-planning consultation, the design team has revised the proposed development to address the concerns raised by the Planning Authority. The revisions made are as follows:

- Provision has been made for a footpath along the northern site boundary as it adjoins Monastery Road to provide for enhanced pedestrian permeability and connectivity between the subject development and the broader surrounding area.
- It is proposed to provide a shared surface upon entry to the proposed development, this surface will comprise Hydropave permeable paving.
- In response to South Dublin County Council's commentary in respect of the quantum of car parking being at the maximum permissible for this location, the proposed scheme has been revised to now provide for a total of 78 no. car parking spaces (62 no. spaces at basement level and 16 no. spaces at surface level), which is considered appropriate given the sites location in proximity to high-capacity, high-frequency public transport services.
- Further to the above amendment, it is noted that the proposed surface level car parking area, adjacent to the northern site boundary has been appropriately broken up with appropriate landscaping and planting.
- The previously proposed road providing access to Block C, along the western boundary of the site has been omitted providing for an increase in open space.
- The previously proposed undercroft area of Block C has been amended with the removal of the previously proposed car parking and the inclusion of 3 no. additional apartment units.

Overall, it is considered that the Applicant has adequately addressed any concerns raised as part of the pre-planning consultation with South Dublin County Council.

3.2 Consultation with An Bord Pleanála (ABP Ref. ABP-310416-21)

Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was held on 30th September 2021.

Attendees: An Bord Pleanála Representatives:

Rachel Kenny – Director of Planning
Rachel Gleave O'Connor – Planning Inspector
Hannah Cullen – Executive Officer

South Dublin County Council Representatives:

Tracy McGibbon – South Dublin County Council (Senior Executive Planner)
Sarah Watson – South Dublin County Council (Case Officers)
Eoin Burke – South Dublin County Council, (Senior Planner)
Fionnuala Collins – South Dublin County Council (Public Realm)
Laurence Collieran – South Dublin County Council (Public Realm)
Graham Muprhy – South Dublin County Council (Senior Executive Engineer)
Ronan Toft – South Dublin County Council (Services and Drainage)
Graham Murphy – South Dublin County Council (Roads Department)
John Hegarty – South Dublin County Council (Roads Department)

Project Team:

Mary McGrath (Client Group),
Anne McElligott – Hughes Planning and Development Consultants
Danielle O'Leary – Hughes Planning and Development Consultant,
Justin Halpin – HA Design Studio
Dominica Musolino - HA Design Studio
Jane McCorkell – Jane McCorkell Landscape Architects
Francis Wade – Lohan & Donnelly Consulting Engineers

An Bord Pleanála subsequently issued a notice of Pre-Application Consultation Opinion on 18th November 2021, which identified 1 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. This item was as follows:

Further consideration of the documents as they relate to pedestrian and cycle access to/from the proposed development is required, in particular how the nature of this access/movement may alter as a result of the change of use from 'employment' to residential use. Consideration should include recognition of desire lines to public transport connections, particularly the Red Cow Luas stop to the east. As part of this, a pedestrian/cycle movement safety audit which would provide details of the scale of pedestrian movement associated with the existing office use, compared to that anticipated with the proposed residential use; along with a description of pedestrian and cycle routes from the site to surrounding areas; as well as any mitigation measures to ensure safe access and egress to the site for pedestrians and cyclists would assist, and demonstrate that these issues have been integrated in to the design of the scheme. Further consideration may require an amendment to the documents and/or design proposals submitted.

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the provision of the following specific information should be submitted with application for submission:

1. *Consideration is required of potential impacts upon the future residential populations of the proposed development on the site, resulting from the existing adjacent quarry use (noting that the applicant has no control over this use). Comprehensive air quality and noise assessments are required with monitoring of basis line levels to be undertaken from*

- the subject site. Any mitigation should be clearly described alongside any measures to preserve mitigation features.*
2. *Consideration is required of any matters that have potential to be material contraventions of the Development Plan, with submission of a statement regarding the same if required.*
 3. *Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality / usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.*
 4. *A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.*
 5. *A Daylight, Sunlight and Overshadowing Assessment is required to demonstrate how the proposed development responds to recommendations in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (the BRE guidelines). The methodology of the BRE guidelines should be followed and clearly stated within the submitted assessment. Analysis of all proposed units on each floor should be provided until it can be demonstrated that all units on a floor meet recommended targets, at which point it can be logically assumed units above will also pass (where a stacked arrangement to room use is proposed). APSH analysis of both the proposed accommodation and existing properties should be provided. Overshadowing analysis of all exterior amenity areas both within the development and in surrounding areas should also be provided.*
 6. *A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.*
 7. *If telecommunications equipment is located on existing structures on the site, consideration is required on any potential impact as a result of the proposed works.*
 8. *Details of waste storage and collection.*
 9. *Details of Part V housing and evidence of discussion with the housing authority regarding the same.*
 10. *Additional details and/or revised proposals in relation to ecology and a bat survey having regard to the comments of the Planning Authority.*
 11. *Additional details and/or revised proposals in relation to comments from Transportation Planning at the Planning Authority.*
 12. *Additional details and/or revised proposals in relation to comments from the Drainage Division at the Planning Authority.*
 13. *A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.*
 14. *The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.*

A Statement of Response to Pre- Application Consultation Opinion has been prepared by Hughes Planning and Development Consultants, detailing how each of the items outlined above have been addressed in fully by the applicant and Design Team prior to the lodgement of this application.

3.3 Further Consultations with South Dublin County Council

Following the discussions at the Tri-Partite meeting and the receipt of the Board's opinion, the design team engaged with a number of different departments with regards to the overall proposals.

3.3.1 Consultations with Planning and Parks Departments

On 4th November 2021, Hughes Planning engaged with the Planning and Parks Department in relation to the landscape proposals and footpath along Monastery Road. The following representatives were in attendance:

Attendees:

South Dublin County Council Representatives:

Tracy McGibbon – South Dublin County Council (Senior Executive Planner)

Fionnuala Collins – South Dublin County Council (Public Realm)

Project Team:

Kevin Hughes – Hughes Planning and Development Consultants

Danielle O'Leary – Hughes Planning and Development Consultant,

An updated landscaping proposal was tabled and the following key items were discussed:

- SDCC acknowledged the improvements made in terms of additional green space being provided noting that this is generally acceptable. It was noted that the area of open space to the left, adjacent to Block A to the west, could be classed as incidental open space and the landscape proposal should give this area a function. It was suggested by the project team that this area of POS be provided with a high park bench and perhaps accommodate some additional planting to give this area a function;
- The triangular piece of land located adjacent to the southern site boundary was discussed and noted that it would be of benefit if this could be included within the proposed scheme. Hughes Planning highlighted that this land is not within the ownership of the applicant and thus could not be included within the redline.
- SDCC Stated that the application documents need to clearly set-out the positive changes that have been made as compensatory measures i.e. Increased balcony spaces, significant quantum of usable, functional communal open space etc and to demonstrate that any open space areas proposed are enhanced through the provision of additional planting.
- With regards to the footpath along Monastery Road, SDCC highlighted that it is key that the application demonstrates how residents will get to the Luas;
- SDCC noted that the applicant group should liaise with the Roads Department in exploring the option of providing an additional pedestrian/cyclist entrance along the northern site boundary.
- SDCC advised that the design team engage with Parks Department further.

Following the above discussions, Jane McCorkell Landscape Architects engaged further with the Parks Department, with the landscape proposals submitted for further consideration by email on 25th November 2021. The Parks Department confirmed on 2nd December 2021 that there were no further comments on the landscape proposals with one change requested in relation to the provision of a slide as part of the play equipment. This change has been implemented in the enclosed planning application documentation.

3.3.2 Consultations with Planning and Roads Departments

The Design Team also engaged with the Roads Department on 29th November 2021. The following representatives were in attendance:

South Dublin County Council Representatives:

John Hegarty – South Dublin County Council (Roads Department)

Project Team:

Gordon Poyntz – Lohan & Donnelly Consulting Engineers;

Justin Halpin – HA Design Studio

The overall proposal was discussed and Roads indicated they would review and revert in due course. In email correspondence dated 7th December 2021, the Roads Department reverted recommending that a 2.0m wide footpath to the south of the existing trees and hedgeline to the roundabout should be provided.

The following was noted in the email correspondence:

“The SDCC Roads Department recommend that the developer at Dolcain House, Monastery Road, Clondalkin, should accommodate a 2.0 meter wide path to accommodate pedestrians and cyclist at the northern boundary along the Monastery Road, recommended path for pedestrians/cyclist route is marked as yellow and shown in the attached drawing for your consideration.

Just to clarify that the proposed path should run to the south of the trees and hedgeline. The purpose is to preserve the trees. The extent of the proposed footpath is from the proposed pedestrian entrance to the north of your proposed development with ramps for disability access down to the public road footpath on Monastery road. The footpath should be constructed eastwards inside the trees on your land and extending to the boundary line in red. There is a section on third party land in the middle. At the red line is where the SDCC public realm starts. It is SDCC’s intention to extend this footpath further eastwards and connect to the existing footpaths on Monastery road to the east of the roundabout. Two Pedestrian crossings to be constructed. One across the SIAC access road and one to cross the Monastery road to the east of the Roundabout to connect to existing paths.”

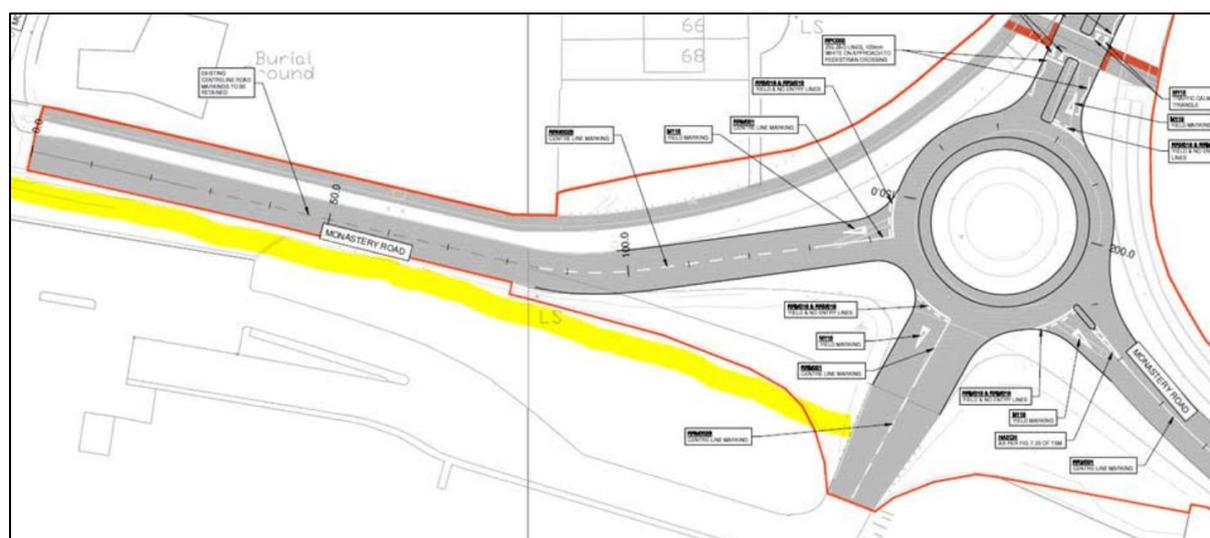


Figure 11 – Location of footpath as requested by South Dublin County Council

On the 8th December 2021, the Design Team met with the Planning and Roads Department regarding this item. The following representatives were in attendance:

Attendees:

South Dublin County Council Representatives:

Tracy McGibbon – South Dublin County Council (Senior Executive Planner)

John Hegarty – South Dublin County Council (Roads Department)

Project Team:

Anne McElligott – Hughes Planning and Development Consultants

Danielle O’Leary – Hughes Planning and Development Consultant,

Gordon Poyntz – Lohan & Donnelly Consulting Engineers;

Justin Halpin – HA Design Studio

Domenica Musolino – HA Design Studio

At this meeting the Design Team confirmed that the majority of the footpath as requested by South Dublin County Council was outside the application redline boundary and that the applicant did not have the legal right to propose or construct any development outside their lands. It was noted that the Roads Department and SDCC consider the provision of this footpath a key item and should be provided.

In light of this, and the fact that the applicant is precluded from proposing works on lands outside their ownership and legally cannot propose such works, the applicant sought to propose a 2m wide footpath on lands within their ownership to the south of Monastery Road (Proposed Site Layout Plan Option A enclosed with this application. This footpath would also tie in with the footpath as permitted under Reg. Ref. SD10A/0064 which is a current live permission set to expire on 9th November 2022. A Movement Audit was prepared by Bruton Consulting Engineers in line with the Opinion of the Board. This Audit recommended that the footpath as proposed within the redline ownership is not provided due to pedestrian safety hazards and concerns. Accordingly, Option B is also proposed which provides for no footpath. The applicant wishes to confirm that a condition requiring that a reservation be made for a future footpath and cycle facilities on the southern side of Monastery Road so that a complete scheme from the Luas Park & Ride overbridge and roundabout to east of the site can be provided would be welcomed.

The Design Team have examined in detailed the existing and future pedestrian and cyclist movements into and around Dolcain House. The design submitted as part of this application provides for dedicated and segregated pedestrian and cyclist connections to the north of the site. This entrance is located immediately adjoining signalised pedestrian crossings that provide safe and direct access to the Red Cow Luas Stop to the east and footpaths to the west to Clondalkin. The pedestrian desire line report indicates that the segregated pedestrian and cycle access as proposed is the best access to serve desire lines. The design of the scheme is such that pedestrians are directed to the existing footpath facilities with the existing access road for vehicles only with electric fob gates proposed permitting vehicle access only. It is submitted to the Board that the proposed development provides for sufficient and high quality facilities for future residents and that should the adjoining lands be redeveloped and a footpath/cycle lane be provided on the adjoining lands either by a third party or South Dublin County Council, that the proposed development can tie in with such networks to provide a safe environment for pedestrians and cyclists. In the interim, it is submitted that there is sufficient and safe facilities to provide access to the east via existing footpaths and the design of the proposed development is such that pedestrians/cyclists will enter the subject site via the dedicated access. This is addressed further in the Response to An Bord Pleanála document prepared by Hughes Planning and Development Consultants and enclosed with this application.

3.3.3 Consultations with the Water Services Department

In addition to the aforementioned consultations, Lohan & Donnelly Consulting Engineers engaged with Ronan Toft (Water Services South Dublin County Council) in relation to revised drainage proposals. On 29th October 2021, Lohan and Donnelly issued updated proposals for the consideration of Water

Services. On 3rd November 2021, Water Services reverted with additional comments and queries which were responded to by Lohan and Donnelly on 9th November 2021. Water Services confirmed on 10th November 2021 that there were no further requests regarding Surface Water proposals with proposals for how the filter drains connecting to surface water drainage network to be illustrated on drawings. This has been addressed as part of the planning application.

4.0 Planning History

4.1 Planning History of the Subject Site

This section provides a review of the planning history for the application site. A review of the South Dublin County Council and An Bord Pleanála planning registers revealed the following planning applications relating specifically to the site in question.

SIAC Construction Ltd, Monastery Road, Clondalkin, Dublin 22

Reg. Ref. S99A/0023 Permission was granted by South Dublin County Council on 26th March 1999 for (A) Office and Science and Technology Enterprise 4 storey addition linked by a glazed atrium to their existing 4 storey offices; (B) Ground floor kitchen extension to the existing offices; (C) Revised surface carparking; (D) New underground carparking; (E) Railing and Fencing; (F) Associated site works.

Monastery Road Clondalkin, Dublin 22

Reg. Ref. SD06A/1072 Permission granted by South Dublin County Council on 27th March 2007 to construct a 4-storey office extension (c.1598sq.m) over undercroft car parking that is connected to the existing Siac HQ building on its southern elevation. Permission is also sought for a c.1212sq.m. car parking area to provide for a total of 28 no. car parking spaces to the rear (south) of the existing office structure at ground level, 16 no. of which are to be provided directly beneath the proposed office extension also at ground floor level; 7 no. existing car park spaces are to be omitted to provide access between the existing car parking area to north abounding Monastery Road and the newly proposed c.1212sq.m. car parking area to the rear via the sites western boundary with Round Towers GAA Club; vehicular access to the proposed office extension to be via the existing access to Siac HQ off the roundabout on Monastery Road; a new c.95m long access route for emergency services from a point due west of existing main entrance westwards to a hardstanding area east of the above mentioned proposed extension. This application also provides for boundary treatments and all other site and development works; all development works take place on a site of c.3525sq.m. on lands that are bound generally to the north by the HQ of Siac, to the south and east by the existing quarry and industrial complex of Siac and to the west by Round Towers GAA grounds all at Monastery Road, Clondalkin, D22.

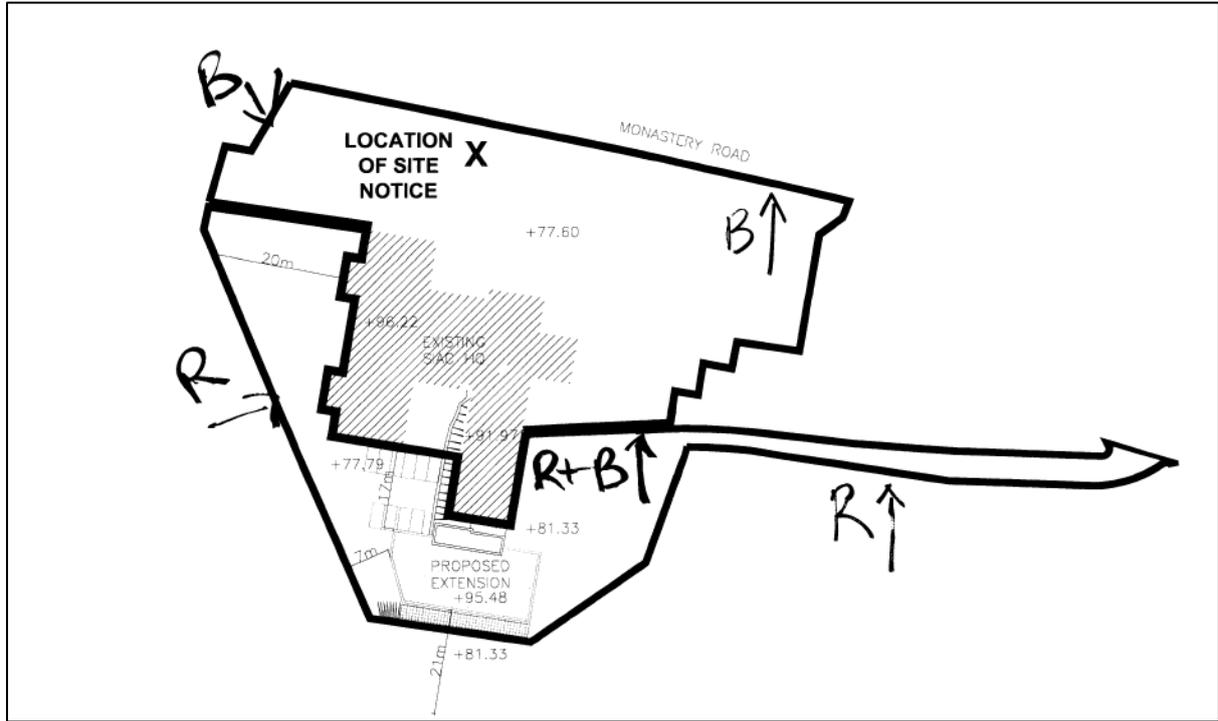


Figure 12.0 Site Layout/Block Plan submitted under Reg. Ref. SD06A1072 indicating the location of the proposed extension, which relates to Block C

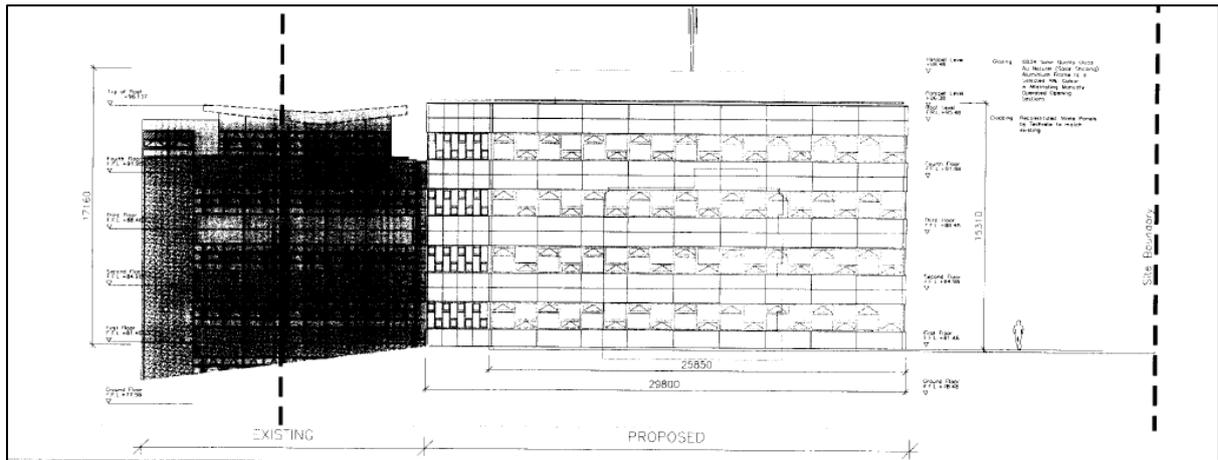


Figure 13.0 Proposed southern elevation submitted under Reg. Ref. SD06A/1072

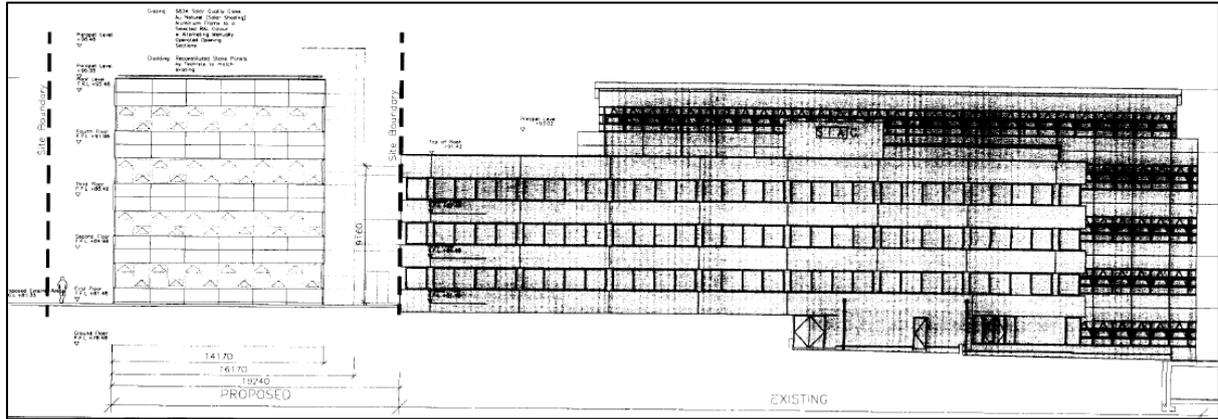


Figure 14.0 Proposed eastern elevation submitted under Ref. Ref. SD06A/1072

SIAC HQ, Monastery Road, Clondalkin, Dublin 22

Reg. Ref. SD08A/0616

Permission granted by South Dublin County Council on 28th October 2008 for a development comprising the construction of additional office accommodation at fifth floor level set-back from the existing parapet and an additional enclosed escape staircore to the south elevation (gross floor area of proposed development 292m²) of the existing extension to Siac HQ (planning ref. SD06A/1072) and the omission of 1 no. car parking space at basement level to facilitate the staircore construction; vehicular access to proposed penthouse storey extension to be via the existing access to Siac HQ off the roundabout on Monastery Road. All of the aforementioned development to take place on a site of c3532m² on lands that are bounded generally to the north by the headquarters of Siac, to the south and west by the existing quarry and industrial complex of Siac and to the east by Round Towers GAA grounds, all at Monastery Road, Clondalkin, D22.

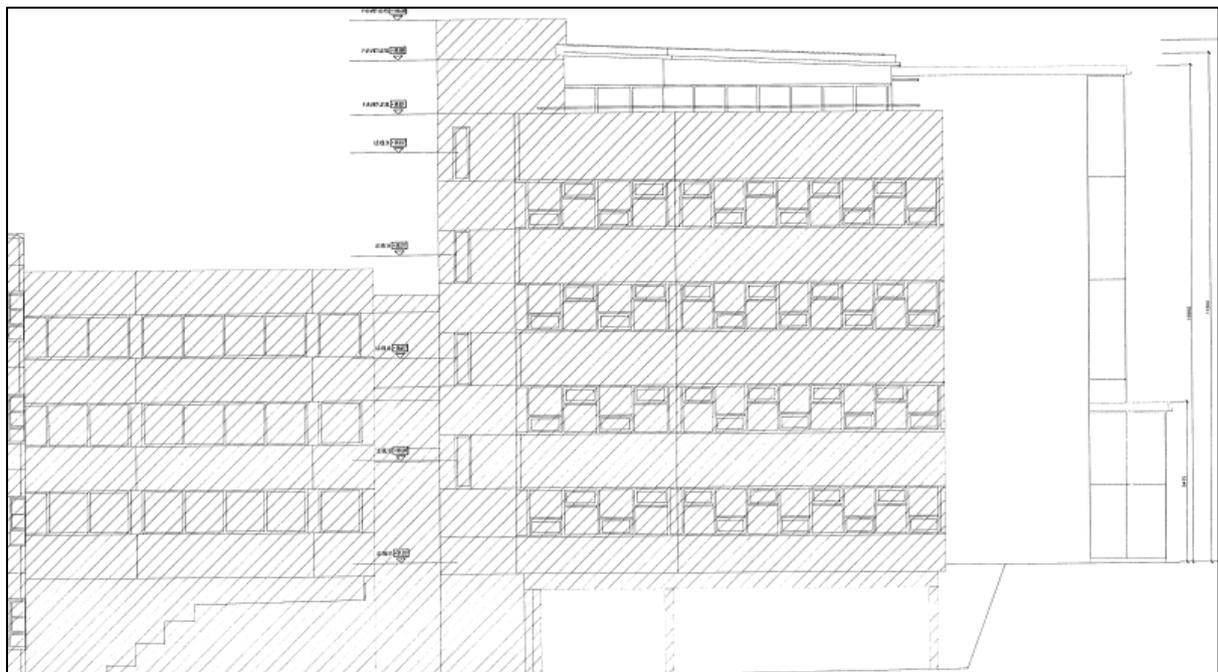


Figure 15.0 Proposed western elevation of development as submitted under Reg. Ref. SD08A/0616, the hatched area denotes the existing structure

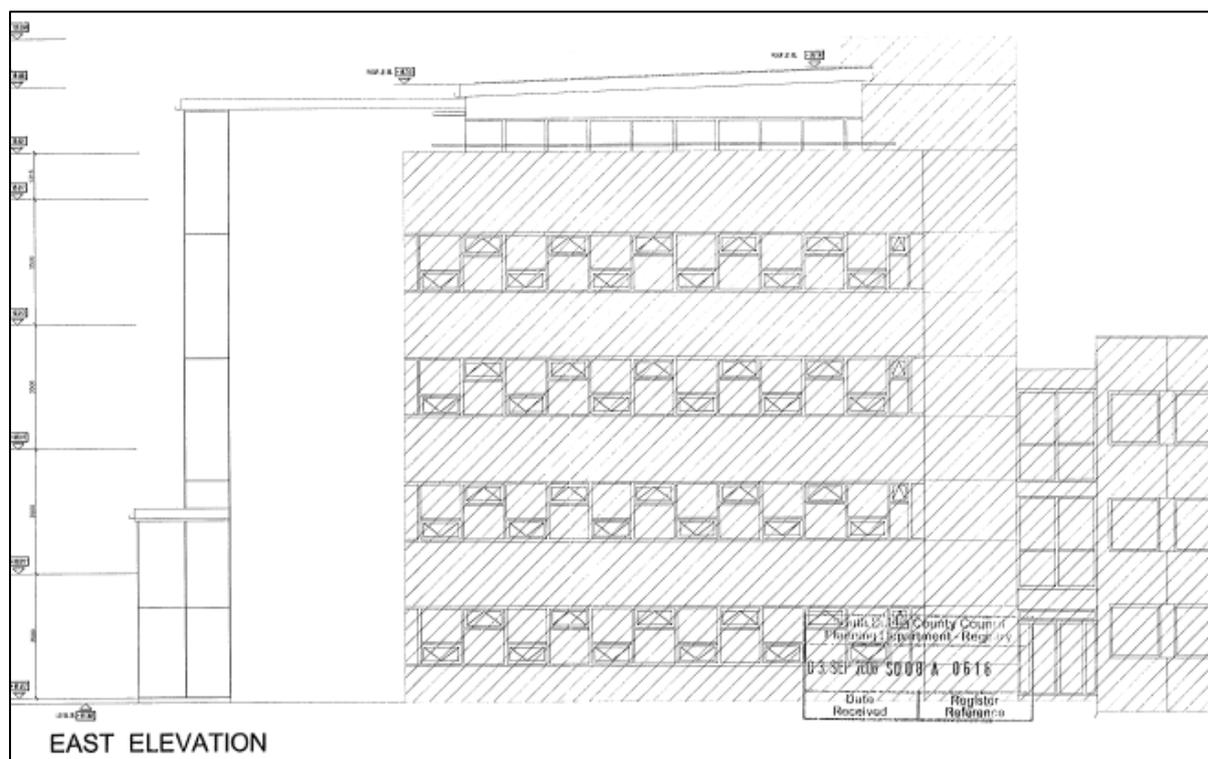


Figure 16.0 Proposed eastern elevation as submitted under Reg. Ref. SD08A/0616, the hatched area denotes the existing structure

The above permission was subsequently extended under Reg. Ref. SD08A/0616/EP on 8th February 2014.

Dolcain House, Monastery Road, Clondalkin, Dublin 22 – Phase 1

Reg. Ref. SD19A/0324

Permission was refused by South Dublin County Council on 10th December 2019 for the change of use from office use to residential use, together with extensions and modifications of the existing blocks known as Block A and Block C and associated atrium, into 86 residential units consisting of 69 one bedroom apartments and 17 two bedroom apartments with associated staff areas; Block A across ground to 4th floor including the removal of the existing 4th floor; part removal of the existing podium slab between ground floor level and lower ground floor level; upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate the proposed residential units; construction of a replacement 4th floor and a 5 storey extension of the block to the north; Atrium across ground to 4th floor including the upgrading of the existing external fabric of the building; modifications to the structure to include the construction on 1 additional floor, together with modifications to internal layouts to accommodate the proposed residential units; Block C across ground to 5th floor including the upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate the proposed residential units, together with the construction of 1 additional floor; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas; public open space areas; surface and lower ground floor level car parking; motorcycle parking; cycle parking and bin storage; all with associated signage, drainage, mechanical plant, roof

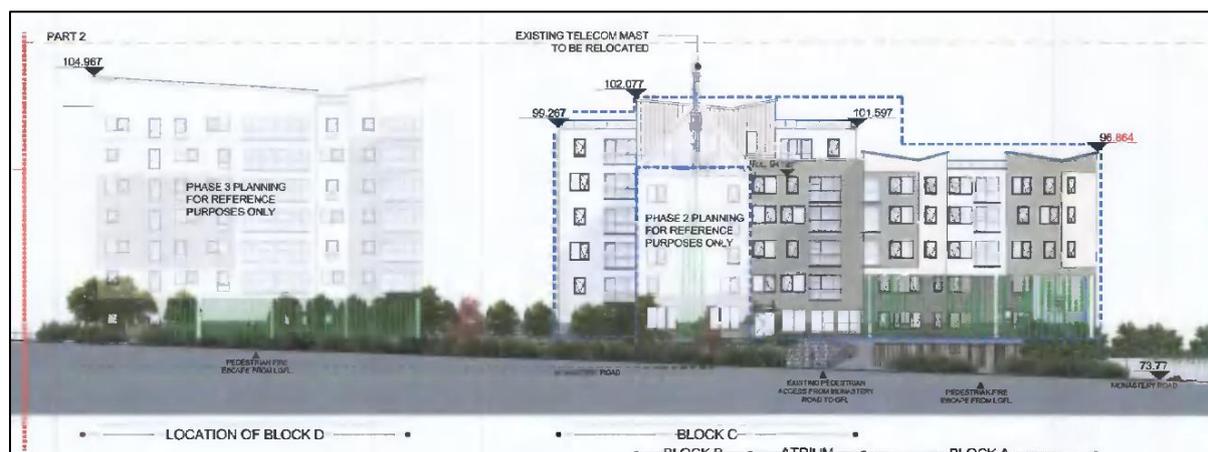


Figure 19.0 Proposed contextual elevations submitted under Reg Ref. SD19A/0324

Dolcain House, Monastery Road, Clondalkin, Dublin 22 – Phase 2

Reg. Ref. SD19A/0327

Permission was refused by South Dublin County Council on 10th December 2019 for the change of use from office use to residential use of the existing Block known as Block B, into 24 residential units consisting of 20 one bedroom apartments and 4 two bedroom apartments with associated gym facility and staff access; Block B across ground to 4th floor including the demolition of the existing single storey extension at ground floor level and external stairs; upgrading of the existing external fabric of the building together with internal removal works and modifications to internal layouts to accommodate proposed residential units throughout gym facility and staff areas at ground floor level together with the construction of 1 additional floor; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas, public open space areas, surface and lower ground floor level car parking, motorcycle parking, cycle parking and bin storage all with associated signage, drainage, mechanical plant, roof gardens with associated access, relocation of existing telecommunications aerials and site development works while maintaining the existing site and basement entrances on completion.

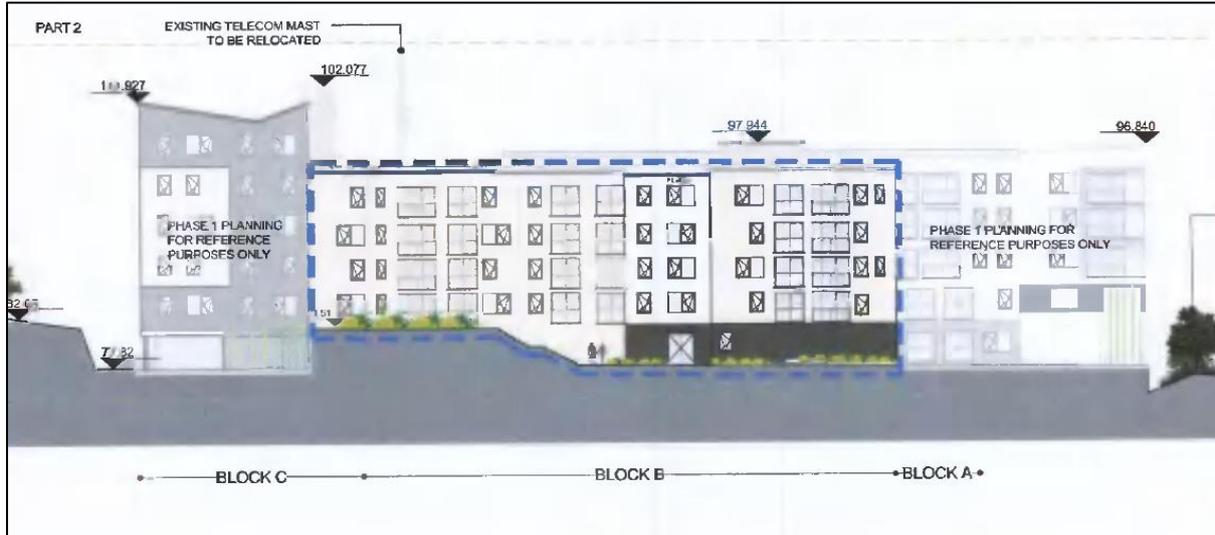


Figure 22.0 Proposed contextual elevations submitted under Reg. Ref. SD19A/0327

Dolcain House, Monastery Road, Clondalkin, Dublin 22 – Phase 3

Reg. Ref. SD19A/0328

Permission was refused by South Dublin County Council on 11th December 2019 for the construction of a new building of 71 residential units known as Block D, consisting of 46 one bedroom apartments, 19 two bedroom apartments and 6 three bedroom apartments across ground to 6th floor; relocation of the existing substation and the part removal of the existing podium slab between ground floor level and lower ground floor level; modifications of the existing lower ground floor car park and ground floor car park area to include landscaped areas; public open space areas; surface and lower ground floor level car parking; motorcycle parking; cycle parking and bin storage; all with associated signage, drainage, mechanical plant, roof gardens with associated access and site development works, while maintaining the existing site and basement entrances on completion.

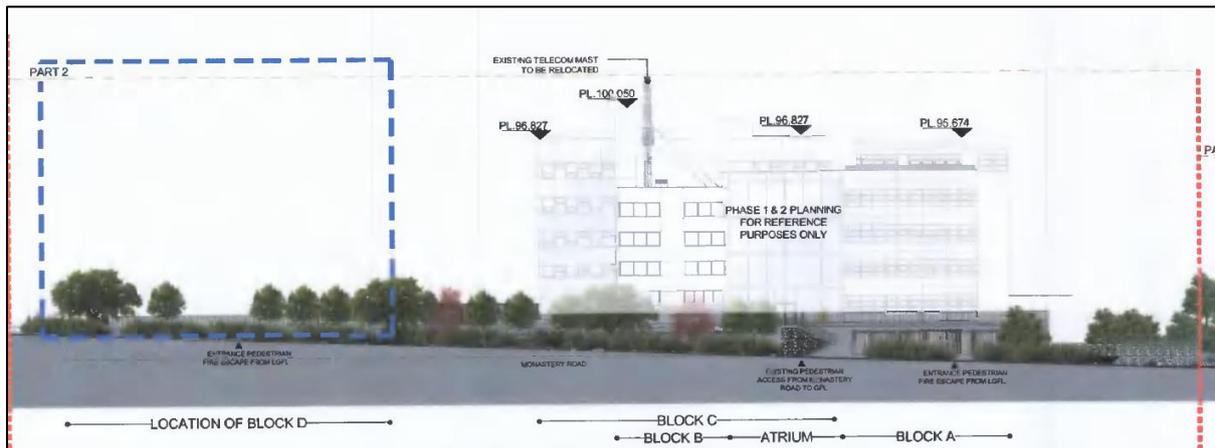


Figure 23.0 Existing contextual elevations submitted under Reg. Ref. SD19A/0328

on the visual amenity of the application site and the character of the wider area, and would set an undesirable precedent for similar type development of the area. The proposal would therefore fail to comply with policies H7 Urban Design in Residential Development and Policy H9 Residential Building Heights as well as sections 11.2.0, 11.2.1 and 11.2.7 of the South Dublin County Council Development Plan (2016-2011). In addition to this having regard to the provisions of the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018), the Planning Authority is not satisfied on the basis of the information submitted that the proposed development complies with the criteria set out in Section 3.2 of said guidelines. The proposed development therefore would be contrary to SPPR 3 of the Ministerial Guidelines and contrary to the proper planning and sustainable development of the area.

- 2. The proposed development would fail to provide an adequate standard of accommodation for prospective residents by reason of poor outlook, lack of privacy, access to daylight/sunlight, air quality, noise disturbance and poor quality and quantity of shared open space. The proposal would therefore be contrary to Policy H11 Residential Design and Layout, Policy H12 Public Open Space, Policy H13 Private and Semi-Private Open Space and Policy H15 Privacy and Security of the South Dublin County Council Development Plan (2016-2022) and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018).*
- 3. The proposal would provide an overprovision of one bed units without adequate justification based on local demand or demographic profile and therefore would fail to provide based on local demand for demographic profile and therefore would fail to provide a balanced range of dwelling types. The proposal would therefore be contrary to H10 Objective 1 Mix of Dwelling Types and section 11.3.1(i) of the South Dublin County Council Development Plan (2016-2022) and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018).*
- 4. The proposal would fail to provide an appropriately landscaped area within the application site. The proposal would also fail to provide acceptable quality and quantity of public open space or any play space for prospective residents. The proposal is therefore contrary to Policy H12 Public Open Space of the South Dublin County Council Development Plan (2016- 2022) and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018).*
- 5. The proposed intensification of vehicular traffic would lead to unacceptable levels of traffic congestion on the adjoining roads network to the detriment of traffic safety. The proposal would also result in poor access for pedestrians and cyclists due to the use of the shared entrance, without proper infrastructure leading to unsafe conditions and traffic hazards. The proposal is therefore considered to be contrary to Policy 5 Traffic and Transport Management of the South Dublin County Council Development Plan (2016-2022).*
- 6. The development as proposed, in the absence of an overall masterplan or framework for the 'RES' zoned lands, taken in conjunction with the two concurrent planning applications within the red site boundary and the extant planning permission on part of the site and the adjacent lands to the east, represents undesirable, haphazard, piecemeal, un-coordinated development and would set an undesirable precedent for similar type developments in the area.*

Two of the aforementioned applications were subsequently subject to First Party Appeals to An Bord Pleanála as follows:

- **Phase 1: Reg. Ref. SD19A/0324 - (ABP Ref. PL06S. 306409)**

The appeal was refused by An Bord Pleanála on 14th January 2021 for the change of use from office use to residential use with extensions and modifications to existing Blocks A and C and associated atrium into 86 apartments, modifications to car park, open space areas, and associated site development works.

The reasons and considerations for noted by An Bord Pleanála for the refusal of the above noted development (ABP Ref. PL06S.30649) are as follows:

1. *Having regard to the over-provision of one-bedroom apartment units, the inclusion of single-aspect north facing units, the absence of appropriate privacy screening to the ground floor level units and the poor quality communal open space, it is considered that the proposed development would conflict with the minimum standards recommended in the "Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities" issued by the Department of Housing, Planning and Local Government in March 2018, and as such, would result in a poor standard of residential amenity for future occupants. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*
2. *Having regard to the proposed site access arrangements, which do not include dedicated pedestrian and cycling infrastructure to serve future occupants of the residential scheme, it is considered that the proposed development would represent an inappropriate form of development, which would create an unacceptable conflict between vehicular traffic and pedestrians and cyclists and would endanger public safety by reason of traffic hazard. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

- **Phase 2: Reg. Ref. SD19A/0327 - (ABP Ref. PL06S. 306399)**

The appeal was refused by An Bord Pleanála on 14th January 2021 for the change of use from office block to 24 apartments, extension and modification of existing building including additional floor to create a five-storey building, internal modifications and modification to lower ground car park.

The reasons and considerations noted by An Bord Pleanála for the refusal the above noted development (ABP Ref. PL06S.306399) are as follows:

1. *Having regard to the over-provision of one-bedroom apartment units and two-bedroom/three-person apartment units and to the poor quality and layout of the communal open spaces, it is considered that the proposed development would conflict with the minimum standards recommended in the "Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities" issued by the Department of Housing, Planning and Local Government in March, 2018, and as such, would result in a poor standard of residential amenity for future occupants. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*
2. *Having regard to the proposed site access arrangements, which do not include dedicated pedestrian and cycling infrastructure to serve future occupants of the residential scheme, it is considered that the proposed development would represent an inappropriate form of development which would create an unacceptable conflict between vehicular traffic and pedestrians and cyclists and would endanger public safety by reason of traffic hazard. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

The overall Master Plan Layout and elevations which formed the basis for the above decision are included in Figures 25.0 to 29.0 (inclusive) below and overleaf. This application has been considered when preparing the subject proposal.



Figure 26.0 Overall Masterplan Layout indicating the lands which were subject to ABP Ref. PL06S. 30649 (outlined in black) and ABP Ref. PL06S. 306399 (outlined in yellow).



Figure 27.0 Contextual elevation of the northern interface of the development proposed under Reg. Ref. SD19A/0324

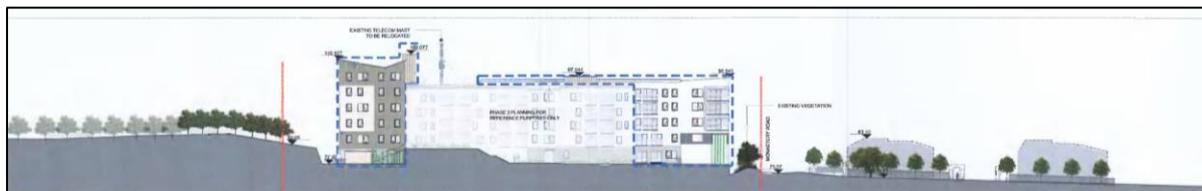


Figure 28.0 Contextual elevation of the eastern interface of the development proposed under Reg. Ref. SD19A/0324



Figure 29.0 Contextual elevation of the northern interface of the development proposed under Reg. Ref. SD19A/0327



Figure 30.0 Contextual elevation of the eastern interface of the development proposed under Reg. Ref. SD19A/0327

The abovementioned application has been considered in preparing the subject proposal. This is discussed in more detail in the proceeding section of this report.

4.1.1 Assessment of the Proposed Development against Refusals issued under ABP Ref. ABP-306409-20 and ABP Ref. ABP-306399-20

As previously discussed in Section 4.1 above, An Bord Pleanála refused permission for the Phase 1 development at Dolcain House (ABP Ref. ABP-306409-20) on 14th January 2021, which included the change of use from office use to residential use with extensions and modifications to existing Blocks A and C and associated atrium into 86 apartments, modifications to car park, open space areas, and associated site development works. A refusal of permission was also issued by An Bord Pleanála for the Phase 2 development at Dolcain House (ABP Ref. ABP-306399-20) on 14th January 2021, which included the change of use from office block to 24 apartments, extension and modification of existing building including additional floor to create a five-storey building, internal modifications and modification to lower ground car park.

It is noted that the refusal reasons issued by An Bord Pleanála are of a similar nature for both applications, as such the below assessment will provide a cumulative response to both and will indicate how the proposed development relating to this pre-application consultation request appropriately addresses each of the key items of note.

4.1.1.1 Refusal Reason No. 1

Unit Mix

Refusal reason No. 1 as outlined in Section 4.1 above relates to the unit mix proposed under ABP Refs. ABP-306409-20 and ABP-306399-20, noting that the scheme as proposed would result in the over-provision of one-bedroom apartment units, with a poor quality communal open spaces which would

conflict with the minimum standards recommended in the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)’

In response to the above refusal reason, we submit that the revised scheme as presented provides for an integrated development, which incorporates the lands relating to the previous Phase 1 (Reg. Ref. SD19A/0324 and ABP Ref. PL06S. 306409), Phase 2 (Reg. Ref. SD19A/0327 and ABP Ref. PL06S. 306399) and Phase 3 (Reg. Ref. SD19A/0328) developments as one cohesive application. The development is now proposed within one SHD application and an overall masterplan for the lands is enclosed with the application demonstrating a co-ordinated and appropriately planned residential development for these zoned residential lands

In response to the Board's concerns regarding the previously proposed unit mix, it is submitted that the proposed development as presented in this statement of consistency and planning report, provides for a total of 61 no. one-bedroom units (47%), 59 no. two-bedroom units (45%) and 10 no. three-bedroom units (8%) across 4 no. blocks.

In the context of the above, **Specific Planning Policy Requirement 1** as comprised within the 2020 Apartment Guidelines provides the following:

*‘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).’*

In accordance with the above guidance, the quantum of one-bedroom units included as part of the proposed scheme to which this planning statement of consistency and planning report pertains, accounts for approximately 47% of the overall development, which is below the maximum allowance of 50%. It is thus submitted that the proposed unit mix is fully compliant with the stated requirements of the 2020 Apartment Guidelines.

Aspect

As part of Refusal reason No. 1 as issued under ABP Ref. ABP-306409-20 (Phase 1), the Board expressed concerns with respect to the provision of single aspect, north facing units. The proposed development which forms part of this application, has taken due consideration of this concern, with 61% of the total units proposed now comprising dual aspect units. In this regard, we note that **Specific Planning Policy Requirement 4**, as contained within the 2020 Apartment Guidelines states the following in relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme:

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.*
- (ii) ***In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.5ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

The subject site is considered to constitute a suburban or intermediate location, outside of Dublin City and thus a minimum requirement of **50%** dual aspect apartments is applicable. The proposed development is fully compliant with this requirement, with 61% of the total units proposed being dual aspect.

Communal Open Space

In respect of the communal open space areas proposed as part of the previously refused Phase 1 (ABP Ref. ABP-306409-20) and Phase 2 (ABP Ref. ABP-306399-20) developments at Dolcain House, the Board concluded that the proposed provision presented a poor quality layout. In response to this item, the proposed development to which this application pertains provides aims to create a high-quality residential environment, with innovative communal open space areas, each of which possesses its own distinct character, creating a high level of residential amenity within the overall scheme.

As demonstrated in the accompanying Landscape Masterplan, as prepared by Jane McCorkell Landscape Architects and the Architectural Site Layout Plan, as prepared by Ha Design Studio, indicates two primary areas of communal open space, which include for the provision of children's play forms, seating and appropriate landscaping. In respect of the required quantum of communal amenity space for apartment developments, Appendix 1 of the 2020 Apartment Guidelines provide the following minimum floor areas for communal amenity space:

Minimum floor areas for communal amenity space	
Studio	4sq.m
One bedrooms	5sq.m
Two bedrooms (3 person)	6sq.m
Two bedrooms (4 person)	7sq.m
Three bedrooms	9sq.m

Table 1.0 Minimum floor areas for communal amenity space as set out within Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2020.

Based on the above standards, the proposed development would require a total of 805sq.m of communal amenity space, the scheme as proposed provides for, 1,375 sq.m of communal amenity space, which is well in excess of this quantum and is considered compliant with the above requirements.

In addition to this, it is submitted that the proposed development provides for a range of passive communal open space areas for residents which promote both social and communal interaction; provide natural style play facilities for a range of ages; promotes the retention of existing trees where possible whilst incorporating a selection of native tree specimens within the development to enhance the overall landscape character; and provides a sustainable soft landscape treatment which integrates the proposed development and the landscape setting. In addition, it is submitted that the proposed communal outdoor areas are all easily accessible from the proposed units, are appropriately surveilled, and well-connected to the internal paving and pedestrian paths, providing for a high-quality residential environment for prospective residents of the scheme.

4.1.1.2 Refusal Reason No. 2

Refusal reason No. 2 as stated in Section 4.1 above relates to the proposed site access arrangements proposed under ABP Refs. ABP-306409-20 and ABP-306399-20, and the lack of dedicated pedestrian and cycling infrastructure to serve future occupants of the residential scheme. It is further considered by the Board that the developments as proposed under ABP Refs. ABP-306409-20 and ABP-306399-20, would create an unacceptable conflict between vehicular traffic and pedestrians and cyclists and would endanger public safety by reason of traffic hazard.

In response to the above concerns, we note that the development as proposed as part of the subject application incorporates a designated bicycle and pedestrian access ramp adjacent to the north-western site boundary and immediately adjoining the existing bus stop on Monastery Road, which will be indicated with appropriate signage and will aid in segregating the movement of pedestrians, cyclists and vehicles on site. In addition, it is noted that that upon bollards will be provided along the proposed shared surface access road, just west of the proposed surface car parking area, which will restrict vehicle movements beyond this point, this creating a safe pedestrian and cyclist friendly environment. It is submitted that a total of 310 no. bicycle parking spaces are provided at basement and surface level

to serve future occupants of the scheme in designated bicycle storage areas, which is considered more than adequate to care for the needs of incoming residents.

The Design Team have examined in detailed the existing and future pedestrian and cyclist movements into and around Dolcain House. The design submitted as part of this application provides for dedicated and segregated pedestrian and cyclist connections to the north of the site. This entrance is located immediately adjoining signalised pedestrian crossings that provide safe and direct access to the Red Cow Luas Stop to the east and footpaths to the west to Clondalkin. The pedestrian desire line report indicates that the segregated pedestrian and cycle access as proposed is the best access to serve desire lines. The design of the scheme is such that pedestrians are directed to the existing footpath facilities with the existing access road for vehicles only with electric fob gates proposed permitting vehicle access only. It is submitted to the Board that the proposed development provides for sufficient and high quality facilities for future residents and that should the adjoining lands be redeveloped and a footpath/cycle lane be provided on the adjoining lands either by a third party or South Dublin County Council, that the proposed development can tie in with such networks to provide a safe environment for pedestrians and cyclists. In the interim, it is submitted that there is sufficient and safe facilities to provide access to the east via existing footpaths and the design of the proposed development is such that pedestrians/cyclists will enter the subject site via the dedicated access.

For further details on the proposed developments access arrangements, please refer to Section 2.1.1 of the Statement of Response to Pre-Application Consultation Opinion.

4.2 Planning History of Adjoining Sites

It is considered useful to examine the planning history associated with sites in the immediate vicinity of the application site. A review of the South Dublin County Council planning register and An Bord Pleanála's website revealed the following planning application relating to the sites in surrounding vicinity of the subject site.

SIAC HQ, Monastery Road, Clondalkin, Dublin 22 (located on the eastern site of the subject site and adjoining site)

Reg. Ref. SD10A/0064 Planning permission granted by South Dublin County Council on 7th September 2010 for a development on the eastern part of the subject site to which this planning report pertains and the adjoining site. The description of development as comprised within the statutory planning notices is as follows: 10 year permission for a mixed use development comprising commercial (non-retail) use (c. 24259sq.m. gfa), 6 no. retail units (c. 1764sq.m. gfa), a crèche (c. 765sq.m. gfa), a cafe/restaurant (c. 400sq.m.), a management office suite (c. 111sq.m. gfa) and 380 no. residential units, all of which is to be accommodated in 18 no. blocks ranging in height from 2 to 8 storeys. Commercial (non-retail) uses to include general enterprise, medical and office based services coming under the definition of Class 2, 3 & 8 of the Planning and Development Regulations 2001, in Blocks A1, A2, B1, C, D1, D2 and E. 1 no. retail unit measuring c. 316sq.m. gfa is located at ground floor level in Block A2 and 5 no. retail units measuring c. 110sq.m., c. 450sq.m., c. 312sq.m., c. 220sq.m. and c. 356sq.m. gfa each are located at ground floor level in Block B2. The proposed crèche is located at ground floor level in Block D1. The proposed cafe is located at ground and first floor level in Block E. The proposed management office suite, to be made available also as a communal space for local residents is located at ground floor in Block E. Residential units are accommodated in Blocks B2, D3, E, F1, F2, G1, G2, H, J, K1, K2 & K3 and comprise 76 no. 3-bed duplex units, 51 no. 3-bed apartment units, 1 no. 2-bed duplex unit, 237 no. 2-bed apartment units and 15 no. 1-bed apartment units. All associated site development and ancillary works, including demolition of 2 no. habitable dwellings (nos. 13 & 15 St. Brigid's Cottages); dismantling of other existing non-residential structures on site, vehicular access via 1 no. existing site entrance with modifications to the roundabout junction on

Monastery Road that provides access to the former quarry area and existing SIAC HQ building from its southwestern arm and to Woodford Hill from its northeastern arm and 1 no. new left-in, left-out site entrance opposite Monastery Gate Avenue; 1440 no. basement car parking spaces including the replacement of 67 no. existing spaces serving Dolcain House (SIAC HQ building) and 97 no. surface spaces; signage; pedestrian and cycle routes; bicycle parking spaces; hard and soft landscaping and boundary treatments; foul and surface water drainage and water supply infrastructure, including 3 no. surface water attenuation tanks and an extension of a foul sewer approximately 1.7km north from the site, eastwards past the Monastery Gate housing estate and northwards along the western boundary of the M50 motorway to the Council's public sewer 9B adjacent to the Camac River; 1 no. wood pellet bio fuel boiler district heating system and supplementary natural gas boilers; 6 no. new and 1 no. replacement ESB substations and associated switch rooms; local bin stores, central compactors and waste storage areas; associated plant and storage areas on a site (c. 6.8ha, including c. 1.7ha sewer extension) at the SIAC HQ lands, Monastery Road and Knockmeenagh Lane and Nos. 13 & 15 St. Brigid's Cottages, Clondalkin. Significant Further Information: The principal changes relate to the scale, massing and layout of the proposed development, full details of which can be obtained by reference to the public planning file.

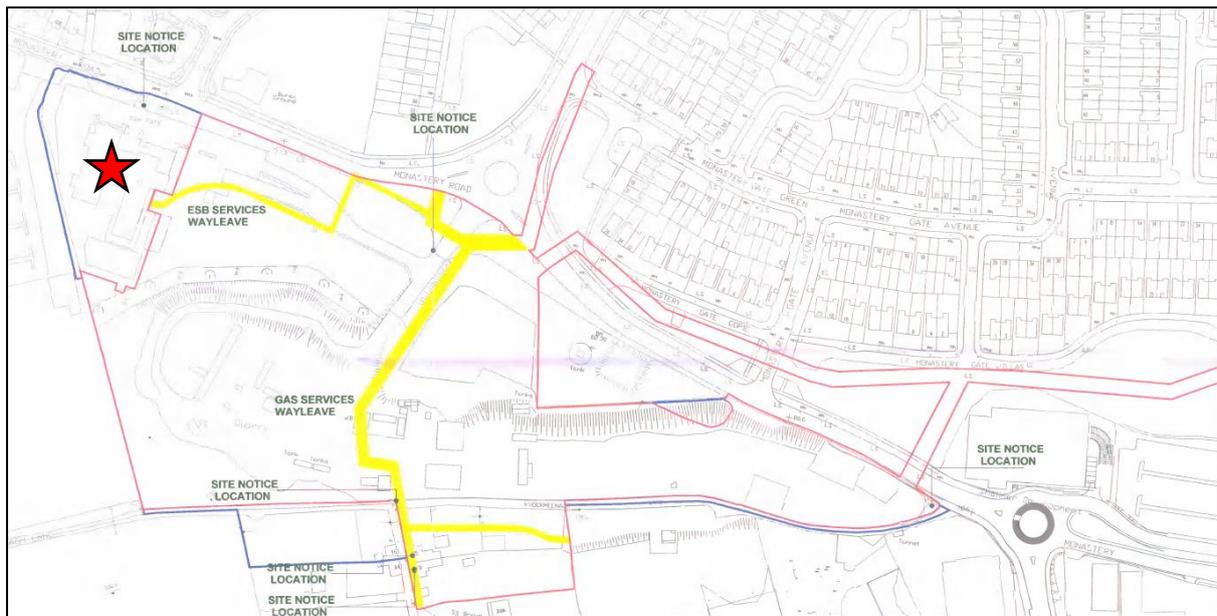


Figure 31.0 Site location map submitted under Reg. Ref. SD10A/0064 indicating the location of application site (outlined in red) in respect of Dolcain House (red star)



Figure 32.0 Site layout plan as submitted at Further Information Stage under Reg. Ref. SD10A/0064 (red star indicating the location of Dolcain House)

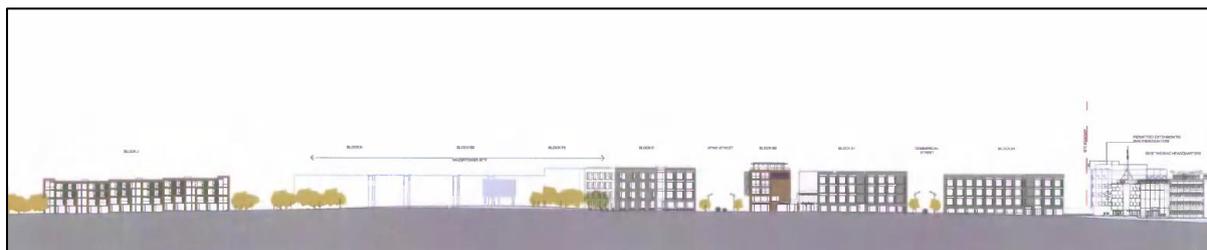


Figure 33.0 Proposed contiguous northern elevation submitted at Further Information Stage under Reg. Ref. SD10A/0064

In the case of the above application, the decision of South Dublin County Council to grant permission, subject to conditions was subsequently subject to 4 no. third-party appeals which refuted the decision of the Planning Authority and 1 no. first-party appeal (**ABP Ref. PL06S.237700**) against the conditions attached to the Planning Authority's Notification of Decision to Grant Permission, specifically Conditions 2(a)(i), 2(b), 3, 4(a), 4(b) 6(c), 8, 12(b), 14(b), 22(c) & (e), 22(h), 24(b), 24(d), 24(f), 25, 27, 28(i), 35, 36, 47, 48, 49 and 50.

In deciding not to accept the recommendation of the Inspector to refuse permission, An Bord Pleanála issued a grant of permission on 12th November 2012, based on the following reasons and considerations:

- (a) *The location of the site on a zoned and services brownfield site, in a strategic location with respect to transport and employment;*
- (b) *The provisions of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the current development plan for the area regarding the preferred location and form of residential development;*

- (c) *The pattern of development in the area, and the enhancement of the amenities of the area that will accrue from development of these under-utilised lands, and*
- (d) *The mixed use nature of the scheme and the coherent urban design approach adopted in developing the scheme, which is considered to align with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas issued by the Department of the Environment, Heritage and Local Government in May 2009.*

As above-noted permission was granted for the above development (**Reg. Ref. SD10A/0064 and ABP Ref. PL. 06S.237700**) by An Bord Pleanála on 12th November 2012, with the permission having a total duration of 10 years from this date. The approved scheme has not yet been built-out, however we note that the permission remains in place until 2022. It is noted that this permission cannot be extended unless substantial works are completed.

In consideration of the above, included within the Architectural Drawings prepared by HA Design Studio which accompany this application, is an overall proposed masterplan which is inclusive of the development as approved on adjacent lands under Reg. Ref. SD10A/0064 and ABP Ref. PL. 06S.237700. It is submitted that this proposed Masterplan demonstrates how the proposed development will integrate and interact with the adjacent previously approved scheme. Please refer to *Drawing No. 18-001-PL-004-Proposed Masterplan*, as prepared by HA Design Studio for full details in this regard.

Dolcain House, Monastery Road, Clondalkin, Dublin 22

Reg. Ref. SD13A/0054

Planning permission granted by South Dublin County Council on 20th May 2013 for the provision of a set of sliding gates, new traffic island and revised kerb layout on the entrance roadway within the SIAC head office site to control vehicular access.



Figure 34.0 Site location map submitted under Reg. Ref. SD13A/0054 indicating the applicable site boundary (outlined in red) in relation to the subject site at Dolcain House (indicated with a red star)

Monastery Road, Clondalkin, Dublin 22

Reg. Ref. SD17A/0196 Planning permission granted by South Dublin County Council on 14th August 2019 for the construction of a stone and aggregate containment enclosure to cover currently exposed stockpiles and all associated site works.

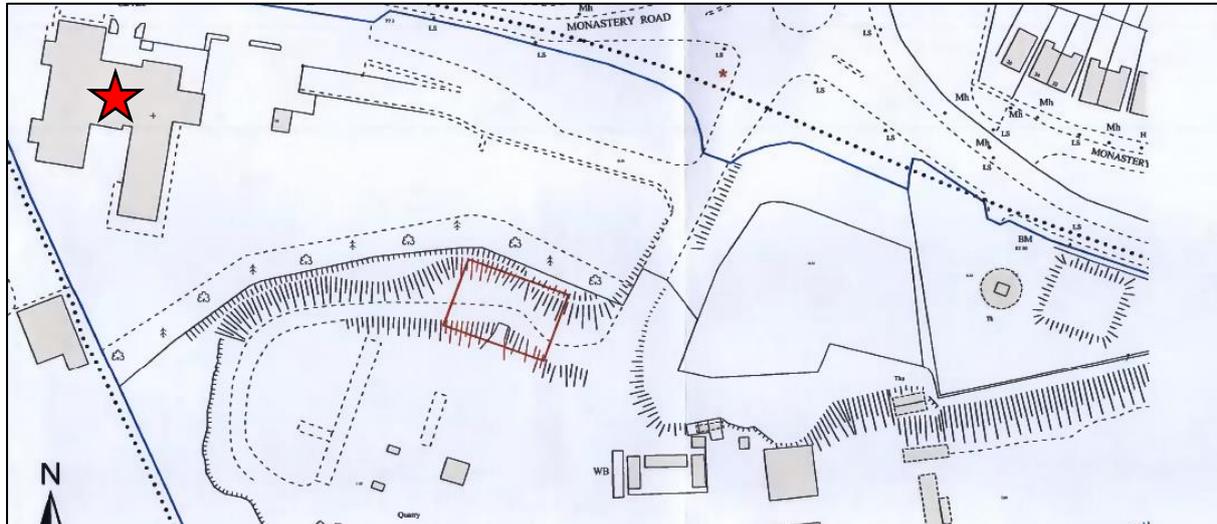


Figure 35.0 Site location map submitted under Reg. Ref. SD17A/0196 indicating the applicable site boundary (outlined in red) in relation to the subject site at Dolcain House (indicated with a red star)

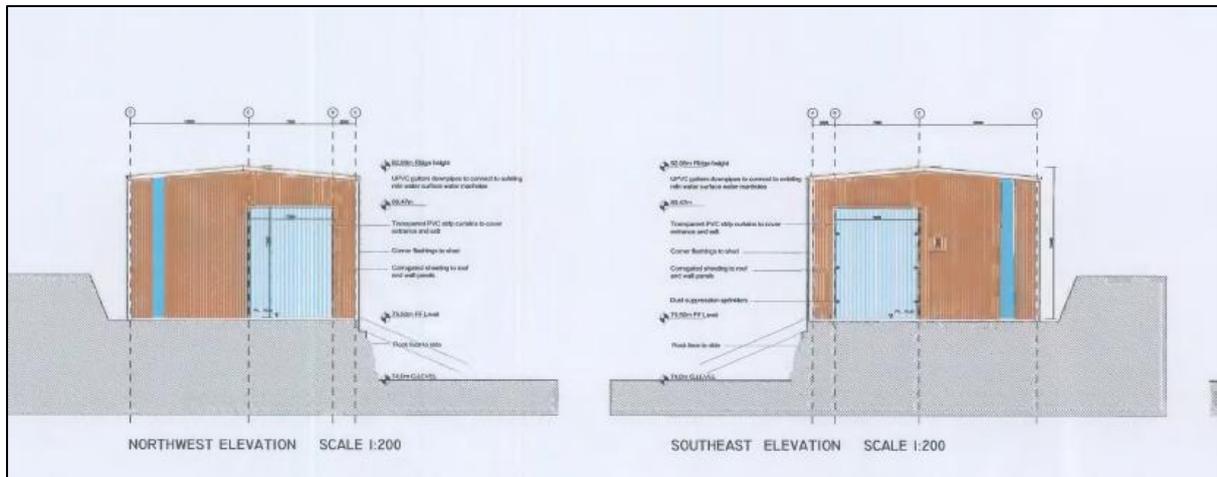


Figure 36.0 Elevation drawings of the proposed development as submitted under Reg. Ref. SD17A/0196

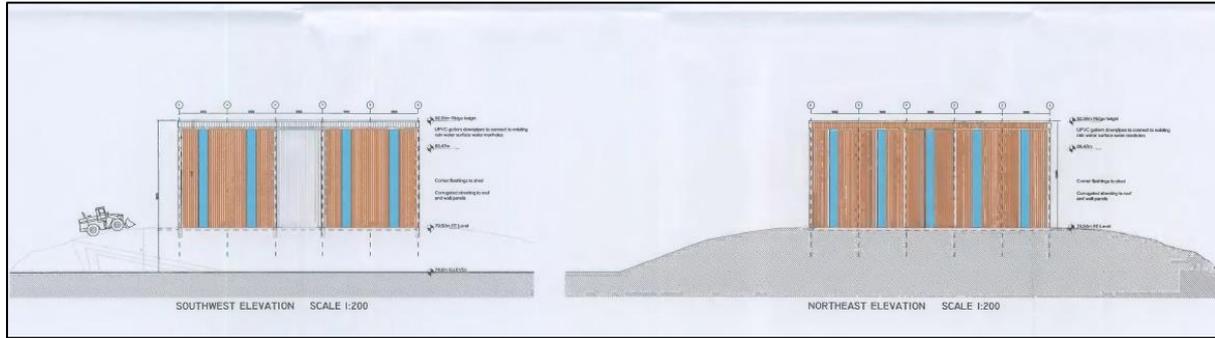


Figure 37.0 Elevation drawings of the proposed development as submitted under Reg. Ref. SD17A/0196

In the case of the above application, the decision of South Dublin County Council was subject to a first-party appeal (ABP Ref. PL06s.249246) to An Bord Pleanála in respect of the conditions attached to the Council's Notification of Decision to grant permission. The decision to grant permission was subsequently upheld by the Board with amended conditions attached as part of the Board's Order.

Monastery Road, Clondalkin, Dublin 22 (lands immediately east and south of the subject site)

Reg. Ref. SD19A/0063

Permission granted by South Dublin County Council on 18th April 2019 for a development consisting of the Addition of a recycled asphalt pavement (RAP) plant to the existing asphalt plant on a 3.0 hectare site within the company's existing landholding; the proposed RAP plant comprises a RAP cold feed bin (hopper); a RAP collecting conveyor; an inclined (rising) conveyor; a RAP buffer silo with belt feeder; a RAP weighing conveyor and a dedicated chute and ducting system connecting to the existing asphalt plant; the proposed development will not result in any change in existing working hours or current production rates; recycled bituminous material to be supplied to the RAP plant will be stored at an existing storage shed at the application site.

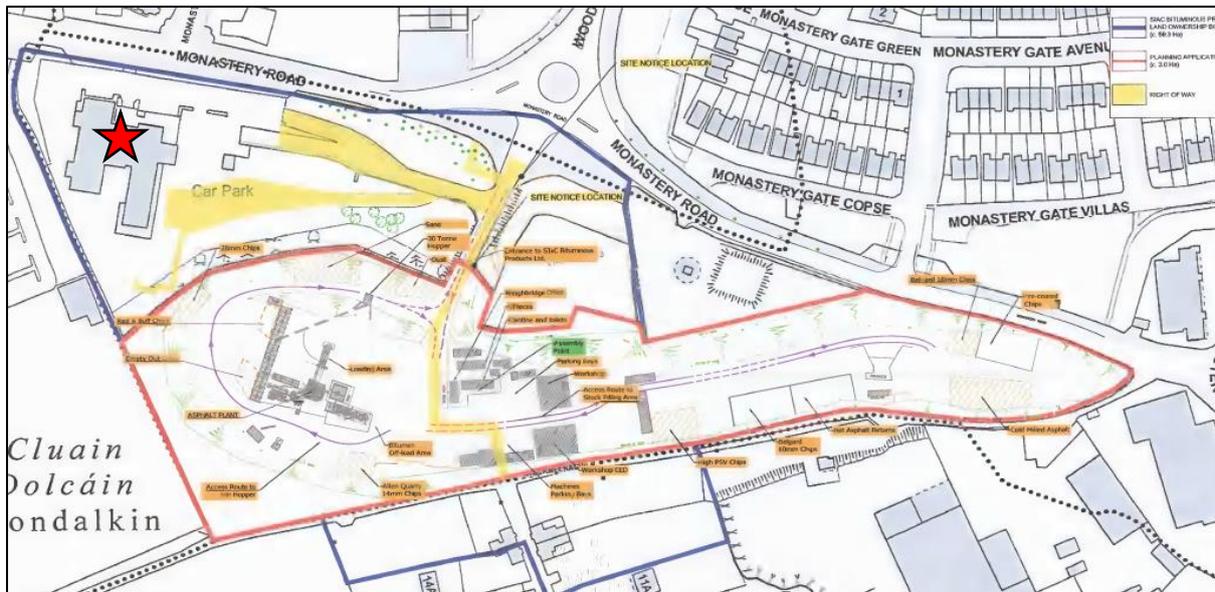


Figure 38.0 Existing site layout plan submitted under Reg. Ref. SD19A/0063 with the applicable lands outlined in orange in relation to the subject site at Dolcain House (indicated with a red star).

4.3 Planning History of Surrounding Sites

It is also considered useful to examine the planning history associated with sites in the wider area surrounding the subject site and the South Dublin County Council administrative area more broadly. A review of the South Dublin County Council planning register and An Bord Pleanála's website revealed the following planning application relating to the sites in surrounding vicinity of the subject site.

Townland of Bushelloaf, Clondalkin, Dublin 22 (located approximately 185 metres south of the subject site)

Reg. Ref. SD20A/0262 Planning permission sought by Colm Neville Construction Unlimited Group for the Construction of a 242 bedroom hotel in a building ranging in height from 7 to 10 storeys over ground and lower ground floor levels; the development will include the lower ground floor accommodating 202 car parking spaces; 54 bicycle parking spaces, plant, stores and ESB substation; ground floor accommodating hotel entrance and reception area; restaurant and bar; outdoor terrace and patio with canopies; function room; meeting rooms; kitchen, staff facilities; stores, toilets and plant; ground floor mezzanine accommodating meeting rooms; admin office; store and laundry facilities; 1st to 9th floor accommodating 242 hotel bedrooms including 17 suites; 10th floor accommodating gym/yoga studio; plant, storage and a roof terrace; vehicular access from both the N7 slip road and Knockmeenagh lane with link street across the site; upgrade works to Knockmeenagh lane; landscaping; boundary treatment; wastewater pumping station; associated signage and all site development works and services; the site is located between Knockmeenagh Lane to the north, St. Brigids cottages to the east, the Nass Road (N7) to the south and the Nass Road Business Park to the west.



Figure 39.0 Aerial image indicating the location of the application site relating to Reg. Ref. D20A/0262 (outlined in yellow) in relation to the subject site at Dolcain House (indicated with a red star)



Figure 42.0 Western elevation of the development as proposed under Reg. Ref. D20A/0262

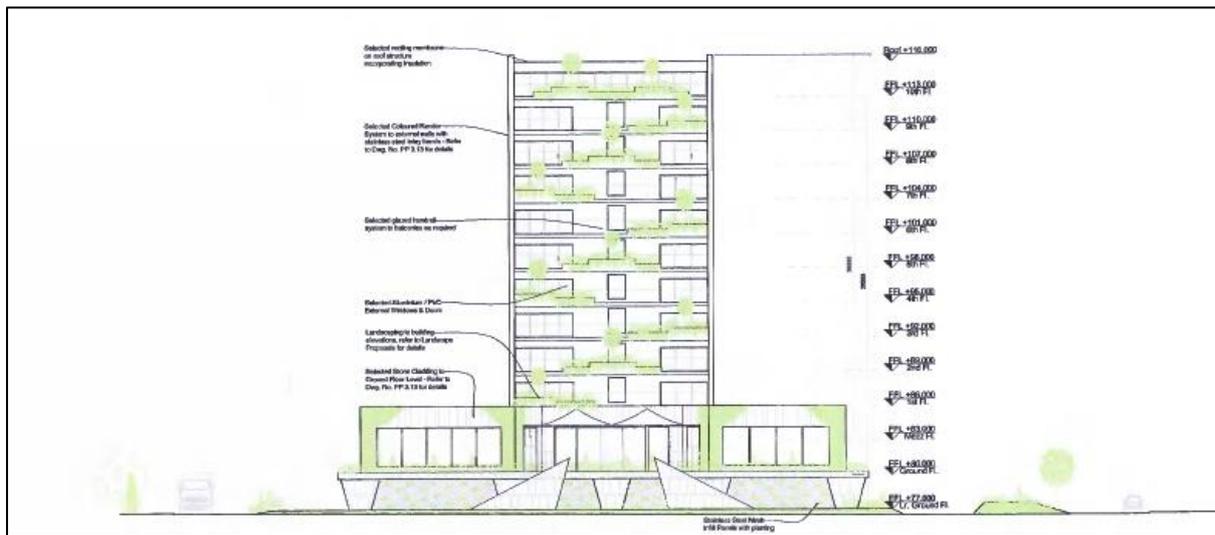


Figure 43.0 Southern elevation of the development as proposed under Reg. Ref. D20A/0262

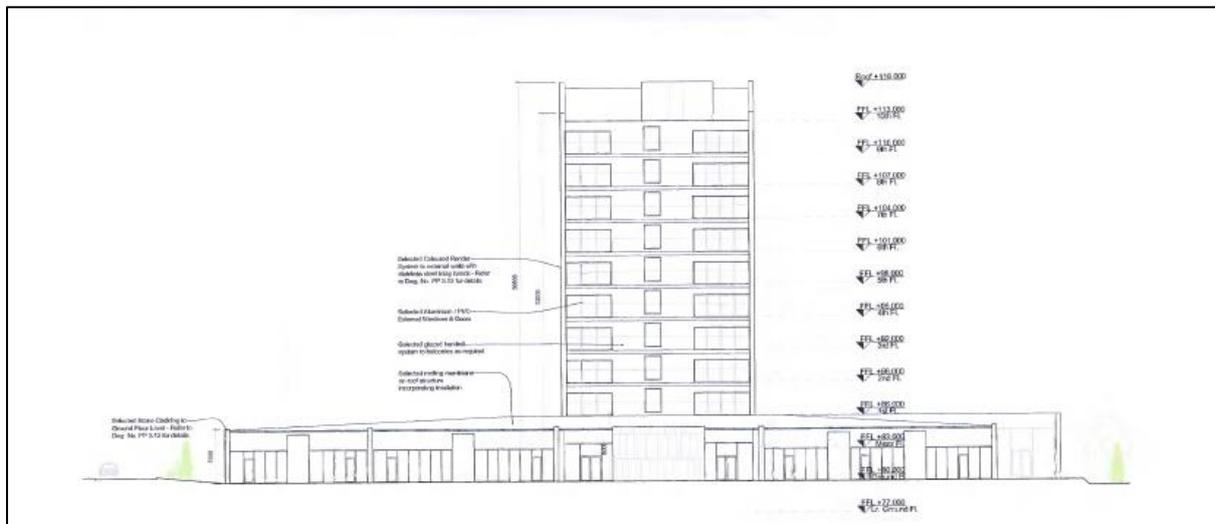


Figure 44.0 Northern elevation of the development as proposed under Reg. Ref. D20A/0262

South Dublin County Council issued a decision to refuse permission on 19th July 2021 for 3 no. reasons. The decision was appealed by the applicant to An Bord Pleanála Ref. ABP-31128-21 with a decision due on 9th February 2022.

Monastery Road, Clondalkin, Dublin 22 (Approximately 225 metres east of the subject site along Monastery Road)

Reg. Ref. SD17A/0291 Planning permission granted by South Dublin County Council on 15th March 2018 for: (i) demolition of former filling station; (ii) construction of a flat-roofed, four storey contemporary apartment building including third floor setback consisting of 19 apartments with private terraces/balconies; (iii) the provision of private open space, 24 car parking spaces, bicycle spaces and bin storage; (iv) landscaped section to Monastery Road; (v) SuDS drainage; (vi) landscaping and boundary treatments and (vi) associated site works.

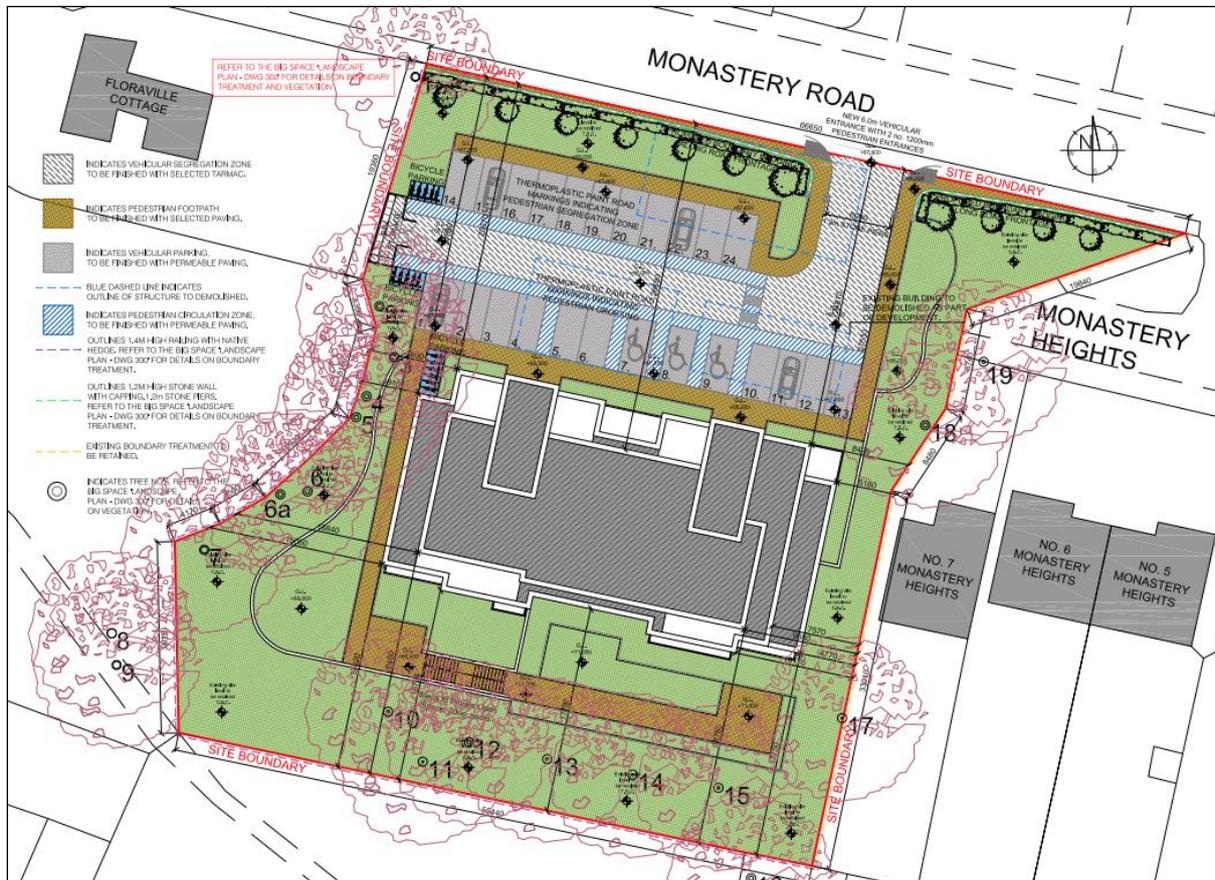


Figure 45.0 Site layout plan granted permission under Reg. Ref. SD17A/0291



Figure 46.0 CGI of development approved under Reg. Ref. SD17A/0291, as viewed from the Monastery Road

In recommending that permission be granted, the Planner's Report (dated 15th March 2018) included the following positive commentary in relation to the principal of infill development on the subject site:

'Having regard to the location of the proposed development on an infill site within an inner suburban area...the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would provide an acceptable standard of residential amenity for future residents, would be acceptable in terms of traffic safety and convenience and would be in accordance with the property planning and sustainable development of the area.'

This application was the subject of a third-party appeal to An Bord Pleanála (ABP Ref. ABP- 301369-18). An Bord Pleanála upheld the decision of South Dublin County Council on 19th November 2018. The Inspector Report (dated 10th August 2018), in recommending that permission be granted included the following positive commentary of note:

7.3.2 *The site given its area and configuration offers the possibility of a wide range of design solutions including individual housing units and or apartments. The site is currently a standalone alone site with a non-residential use which also presents the opportunity to provide a variation from the current predominant residential type in the immediate area. The site occupies an important location on the approach to the village with frontage onto Monastery Road but the relative separation from adjoining properties and the areas of open space on one boundary and partially on another does permit a distinctive design approach for the site. In this context the use of the site for apartments is a reasonable approach but it should not be at the expense of impacting on existing amenities.*

7.3.6. *The incorporation of four floor / stories building block is a departure from adjoining development but the amended design provides for the overall mass to be broken up by the use of a transition from two floors adjoining Monastery Heights to three floors and then to the four floors at the core and central section of the block and also retaining a partial reduction to three floors at the northern section of the apartment block. The variation in the site levels with the finished floor area higher in Monastery Heights compared to the appeal site also reduces the overall variance in overall height and as a transition from existing adjoining development into the core of the proposed development. In this respect it recognises scale in adjoining properties and provides for a development with its own statement. The principle and concept of the design is therefore I consider acceptable.*

This development was subsequently amended, under Reg. Ref. SD19A/0383/ABP Ref. ABP-307113-20, to include an additional 2 no. one-bedroom apartments bringing the overall unit total to 22 no. units.

5.0 Proposed Development

The development proposed demolition of existing shed (15.7sq.m), sub-station (29.5sq.m) and oil tank (12.1sq.m) located in the north-eastern section of the subject site, in addition to other internal and external removal and repair works to the existing Blocks A, B and C as demonstrated on Architectural Drawing Nos. 18-001-PL-302, 18-001-PL-300, 18-001-PL-200, 18-001-PL-104, 18-001-PL-102, 18-001-PL-100 AND 18-001-PL-002, as prepared by Ha Design Stuido.

The proposed development provides for the change of use and alterations and modifications to the existing commercial blocks at Dolcain House, referred to as Blocks A, B and C, and the construction of a new Block D with the blocks ranging in height from 4/5 – 6 storeys over basement providing for a total of 130 no. residential apartment units comprising 61 no. one beds, 59 no. 2 bed units and 10 no. 3 bed units as follows:

- **Block A (including Atrium)** – 4- 5-6 Storeys in height comprising 50 apartments (22 no. 1 beds, 22 no. 2 beds and 6 no. 3 beds);
- **Block B** – 5 Storeys in height comprising 22 apartments (9 no. 1 beds, 9 no. 2 beds and 4 no. 3 beds);
- **Block C** – 6 storeys in height comprising 29 apartments (13 no. 1 beds and 16 no. 2 beds); and,
- **Block D** – 6 storeys in height comprising 29 apartments (17 no. 1 beds and 12 no. 2 beds).

The existing blocks on-site, Blocks A, B and C currently range in height from 4-5 storeys over basement. To facilitate the proposed development, the required alterations to the existing Blocks A, B and C will comprise the provision of an additional floor level with 2 no. additional floors proposed to the atrium to now provide for a height of 4/5-6 storeys to Blocks A, B and C and upgrading of the existing external fabric of the building as well as internal modifications to layouts to accommodate the proposed residential apartments. Alterations to Block A also include replacement of existing fourth floor level with a new fourth floor level and the construction of a 5-storey extension to the northern elevation. The overall housing density proposed is **160 no. dwellings per hectare**. The proposed development comprises a plot ratio of **1.4** and a site coverage of **29%**.

The proposed new block, Block D will be located to the east of Block B and will accommodate 29 no. apartments. Private amenity space to serve the proposed units, is proposed in the form of balconies and private patios, each of which complies with or exceeds the minimum requirements set out within the Design Standards for New Apartments, Guidelines for Planning Authorities (2020).

The proposed development will be served by communal residential amenities and facilities at surface and basement levels, including communal open space and outdoor areas at surface level. These communal amenity spaces will accommodate a main entrance plaza, public seating and children's play areas, promoting social cohesion within the development. The overall scheme includes 2,185sq.m of open space (communal open space and public open space). In comparison to the previously refused developments on site as discussed in section 4.0 above, open space provision has been increased within the current proposal with surface parking between Blocks B and D omitted ensuring a large area of open space is provided. Similarly, parking to the west of Block A has been omitted further increasing open space. Please refer to the landscape masterplan prepared by Jane McCorkell Landscape Architects for further details in this regard.

The proposed development also provides for 78 no. car parking spaces (62 no. spaces at basement level and 16 no. at surface level), 310 no. bikes spaces (254 no. spaces at basement level and 56 no. at surface level), and 4 no. motorcycle parking spaces with bin storage and plant room also proposed at basement level. The scheme includes the provision of appropriate landscaping at surface level, as well as two options in relation to a new public footpath. Option A provides for a footpath on the southern site of Monastery Road to facilitate connections to the existing and planned pedestrian network surrounding the subject, this proposed extension to the current pedestrian footpath to the front (north) of the subject site is proposed where it currently terminates at the corner of Monastery Road and Monastery Heath Avenue, thus continuing the public footpath network along the whole northern

boundary of the subject site. Option B provides for the omission of this footpath in line with the Movement Safety Audit which recommends that the provision of this footpath would not be the safest route for pedestrians. The applicant wishes to confirm that should the Board consider option B appropriate, a condition requiring the reservation of the lands for a footpath to be developed when either a third party or South Dublin County Council construct same on the adjoining lands would be welcomed.

The proposed development also provides for a dedicated pedestrian and cyclist access ramp at the existing pedestrian crossing on Monastery Road and immediately adjoining the Dublin bus stop thereby increasing pedestrian and cycle enhancing and prioritising connectivity throughout the site. Bicycle parking is proposed at basement level with surface level parking also proposed. Vehicular access to the development is proposed through the existing access/entrance to Dolcain House to the east.

Associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

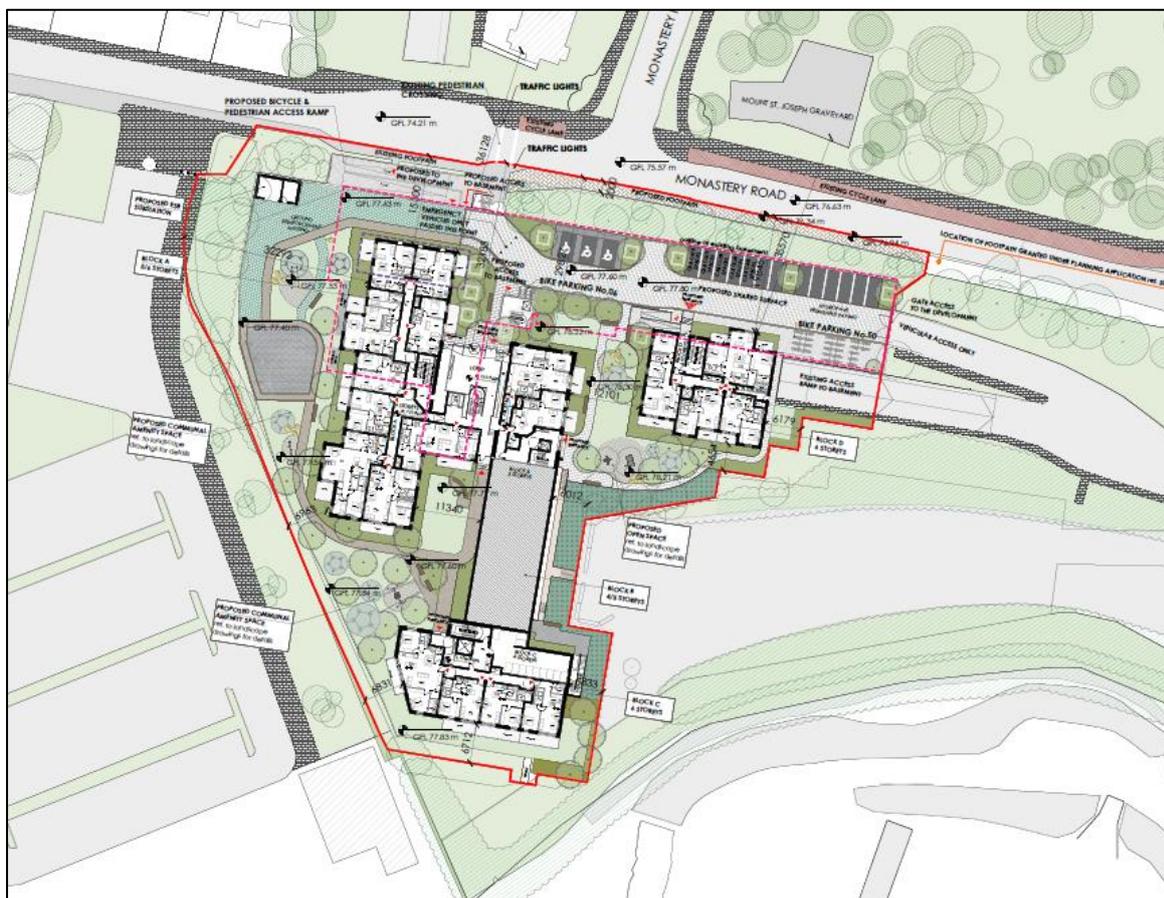


Figure 47.0 Proposed site layout plan Option A (including footpath)

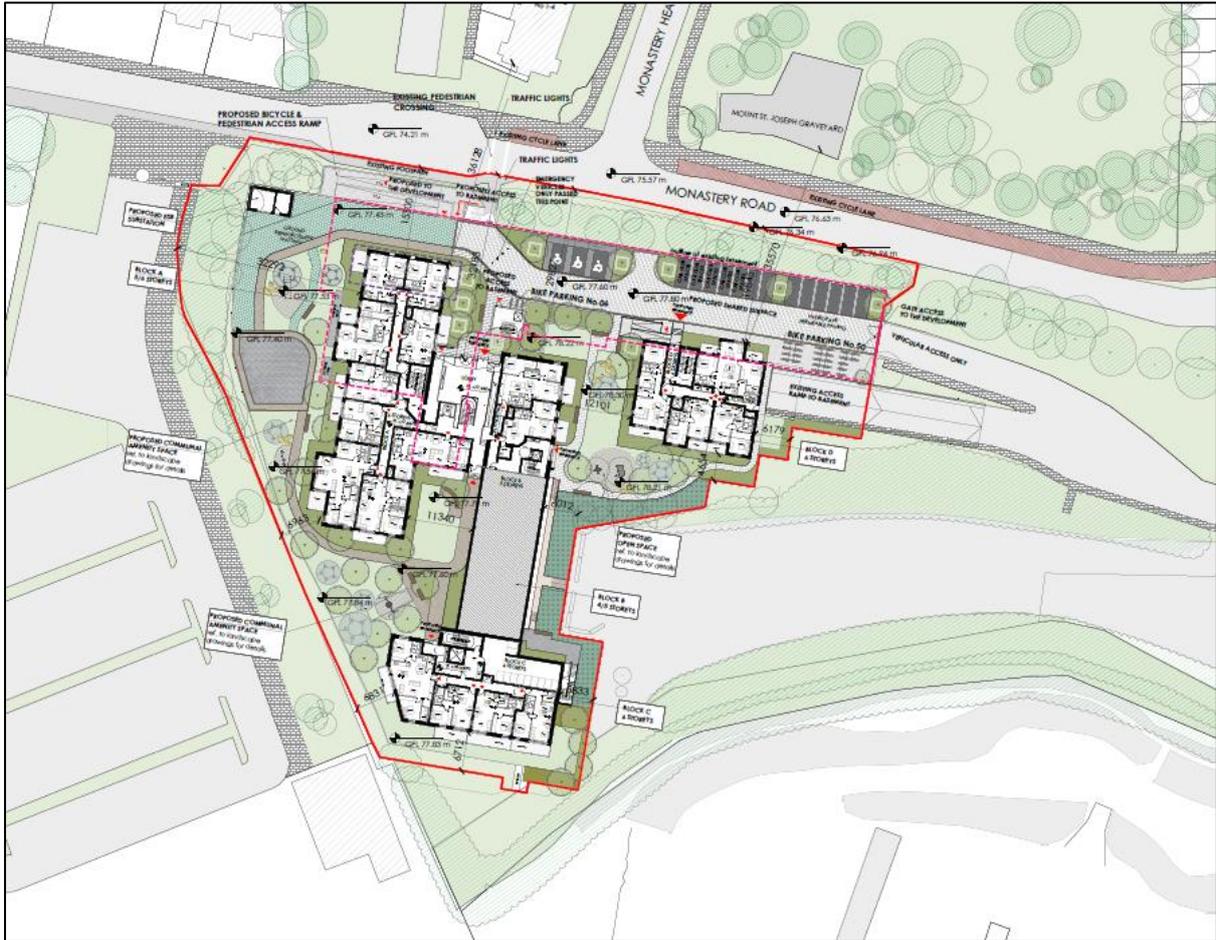


Figure 48.0 Proposed Site layout plan Option B (no footpath)

In respect of materiality and finishes, the external elevations of Blocks A, B, C and D will comprise a high-quality and aesthetically pleasing pallet of materials including white render, light-coloured brick and stone, with bronze metal railings to proposed balconies, bronze glazed windows and doors and bronze metal cladding.

It is considered that the proposed scheme will present as an appropriate expression when viewed from Monastery Road and will enhance the visual amenity of the immediately surrounding area through the incorporation of a high-quality, innovative and contemporary design, which appropriately utilises the existing structure on site. Given the accessible location of the subject site, it is submitted that the proposed development on site provides a unique opportunity to enhance the overall density of the site increase building heights within an appropriate location, within close proximity to frequent and reliable public transport services, and promote consolidation in accordance with the aims and objectives as set out within the National Planning Framework (NPF) and the Regional and Economic Spatial Strategy for the Eastern and Midlands Region (RSES). Furthermore, it is contended that the proposal will significantly enhance the vitality of the area, whilst also providing much needed additional accommodation within the Dublin Region.



Figure 49.0 Material references considered as part of the project design

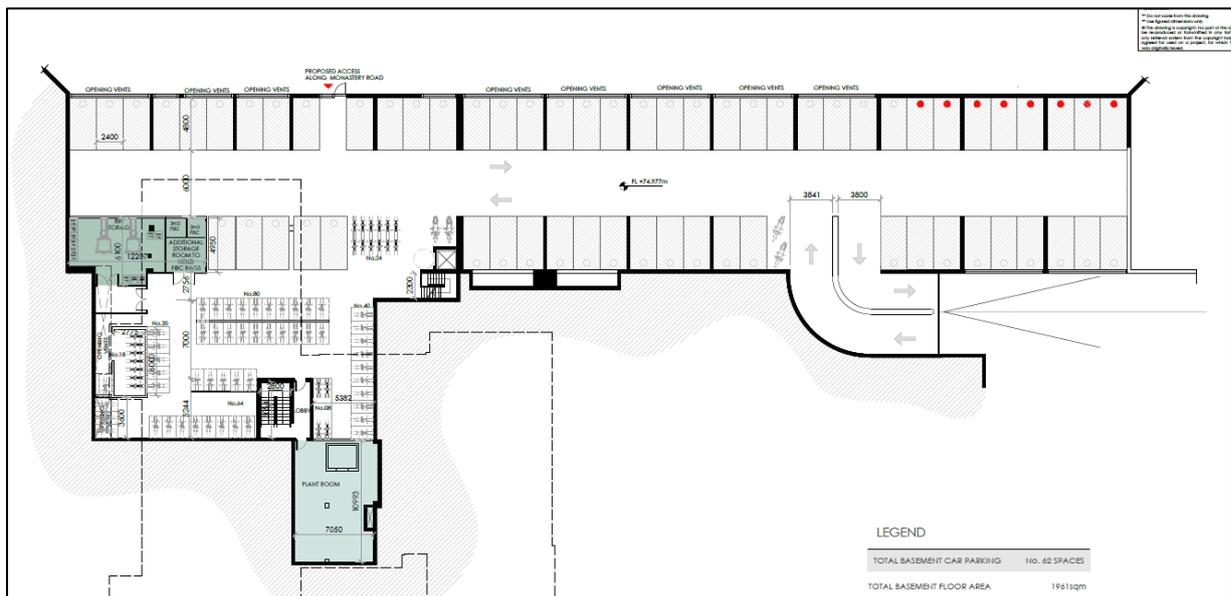


Figure 50.0 Basement level of the proposed development

Proposed Floor Plans and Elevations for Blocks A, B and C

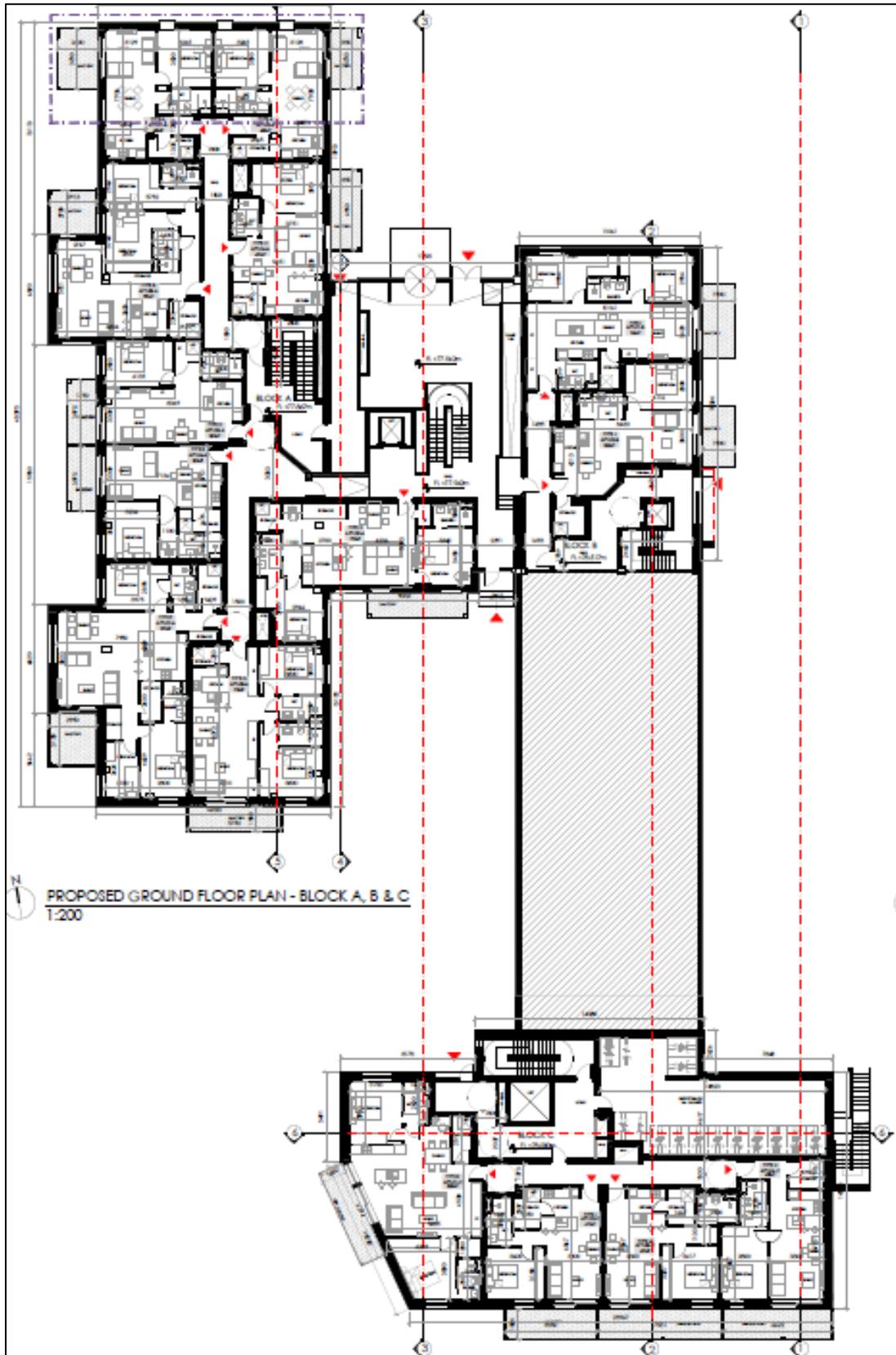


Figure 51.0 Ground floor plan of the proposed Blocks A, B and C

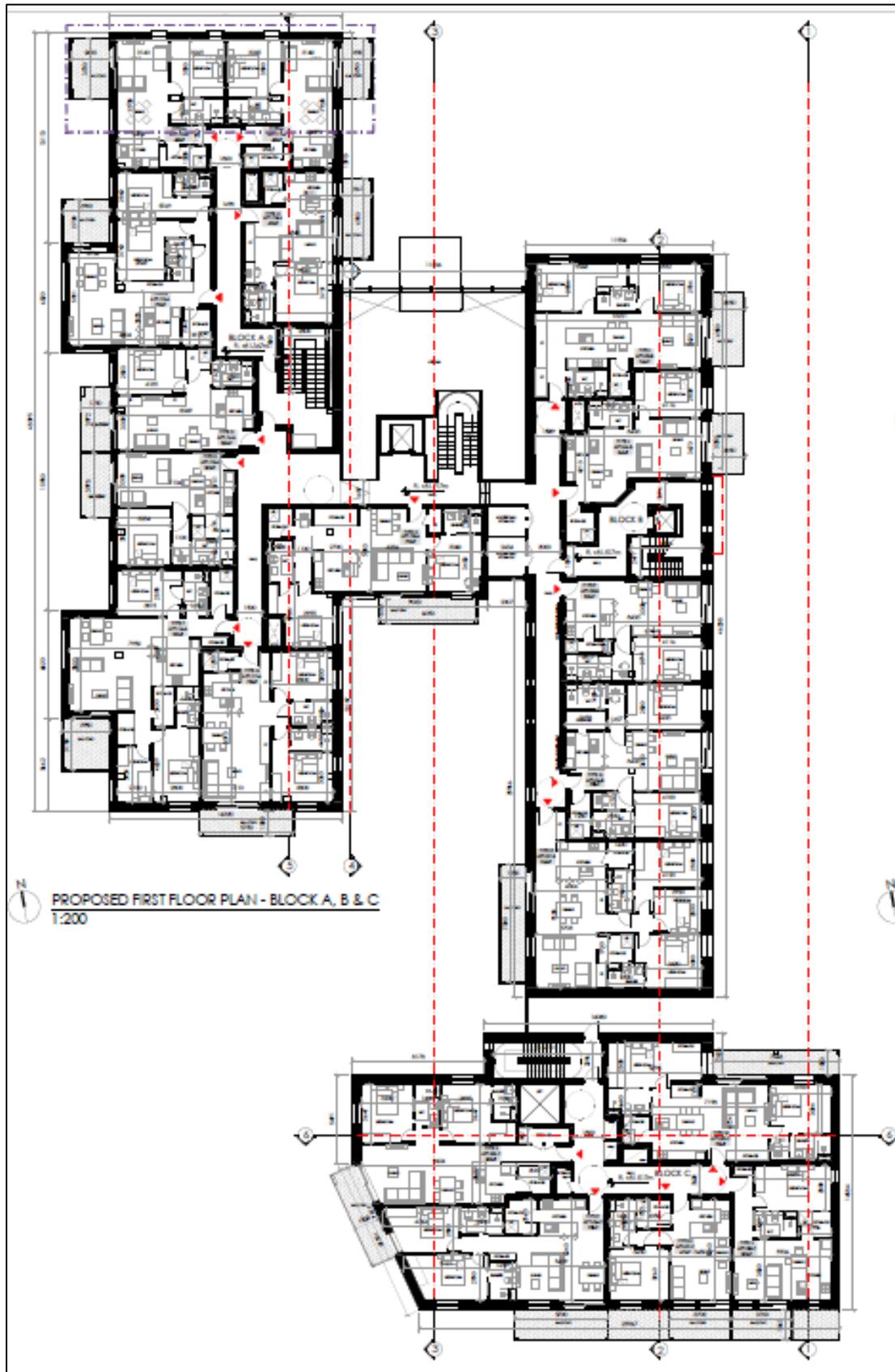


Figure 52.0 First floor plan of the proposed Blocks A, B and C

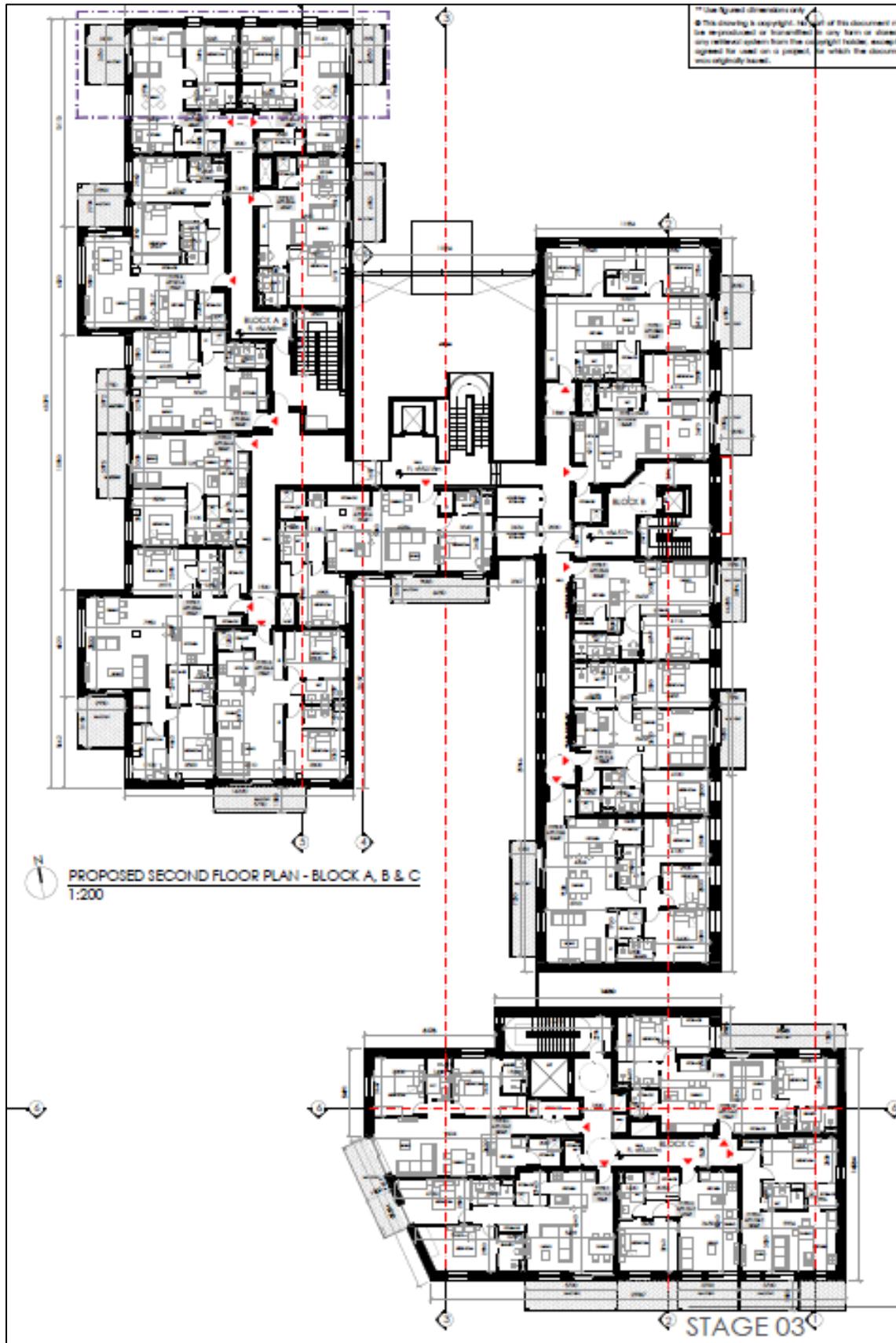


Figure 53.0 Second floor plan of the proposed Blocks A, B and C

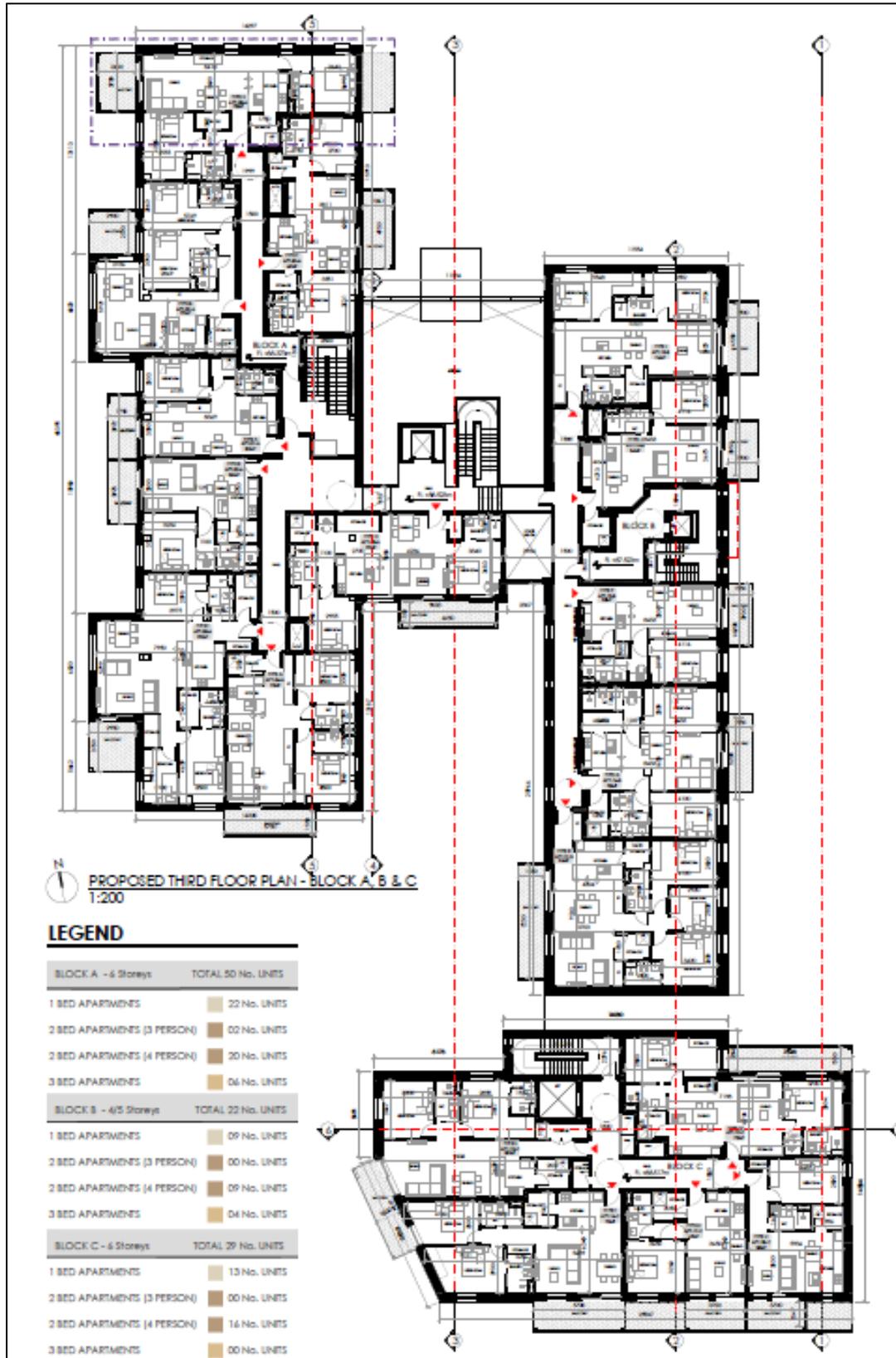


Figure 54.0 Third floor plan of the proposed Blocks A, B and C

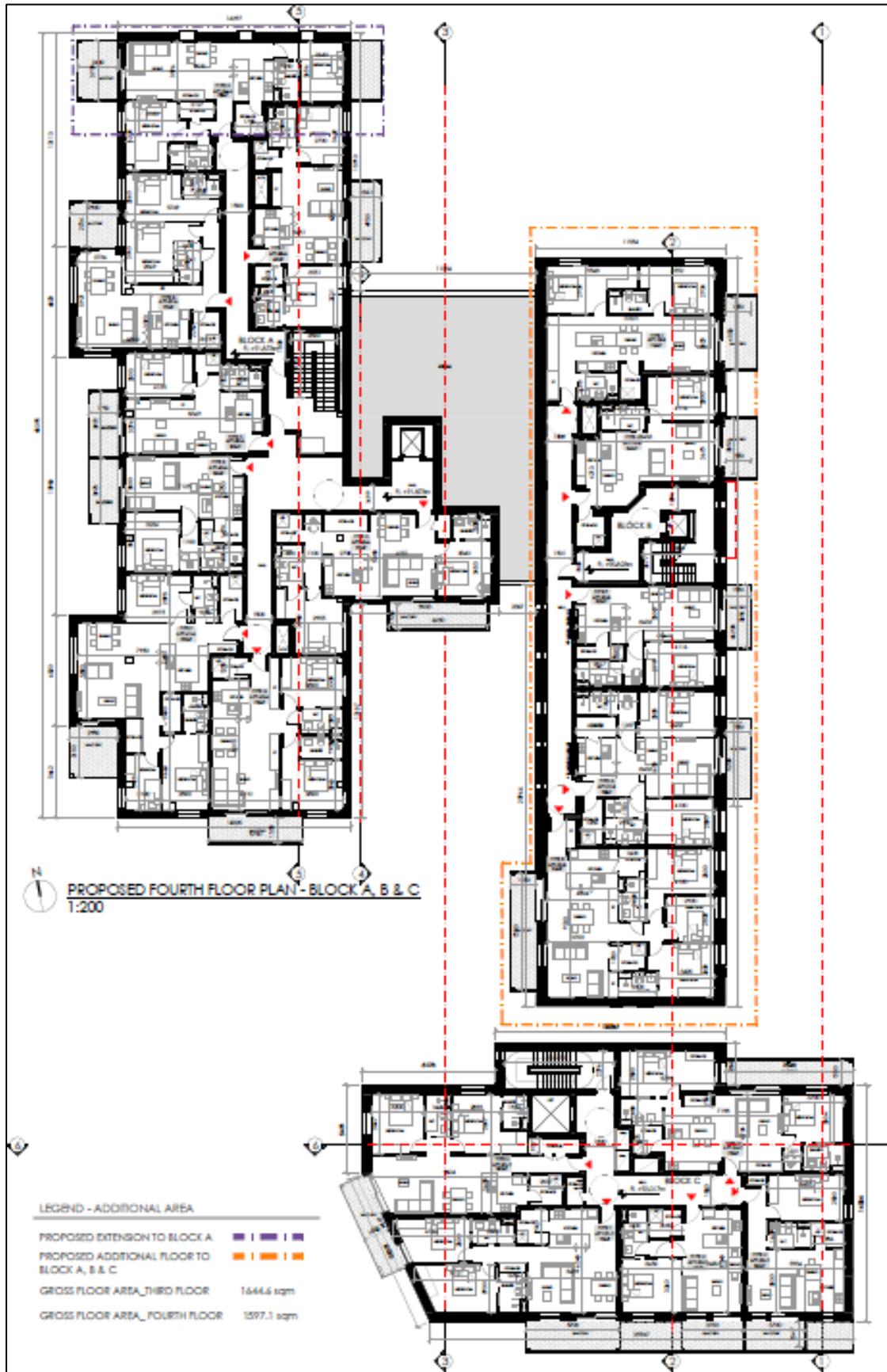


Figure 55.0 Fourth floor plan of the proposed Blocks A, B and C

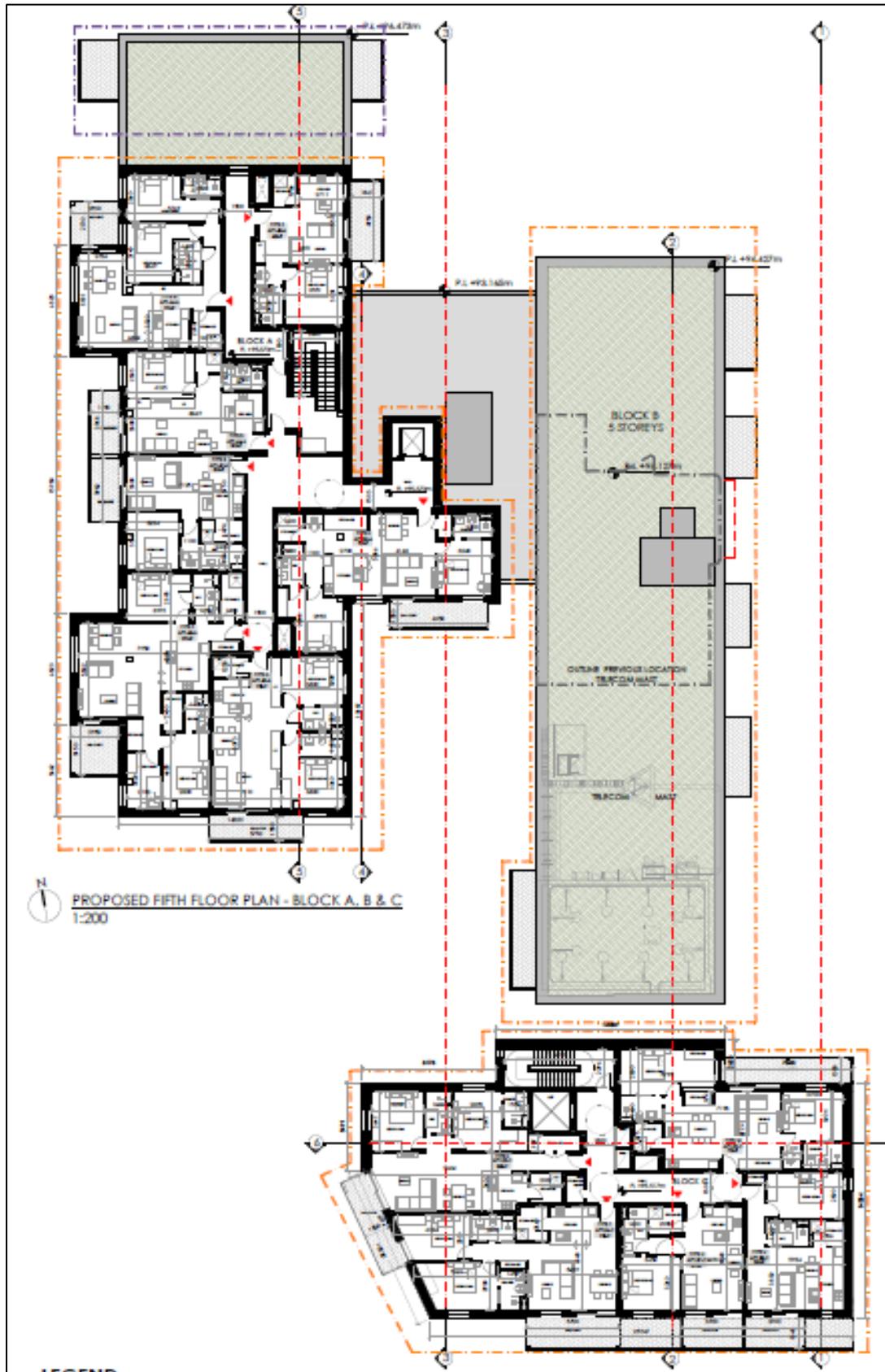


Figure 56.0 Fifth floor plan of the proposed Blocks A, B and C, as indicated the fifth floor level of Block A will be appropriately recessed from the Monastery Road frontage.

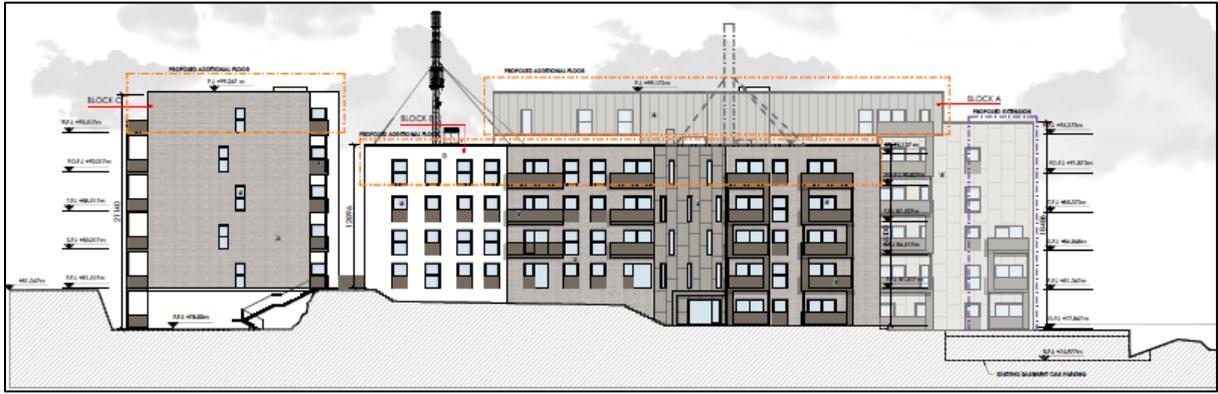


Figure 57.0 Proposed side (eastern) elevation of Blocks A, B and C

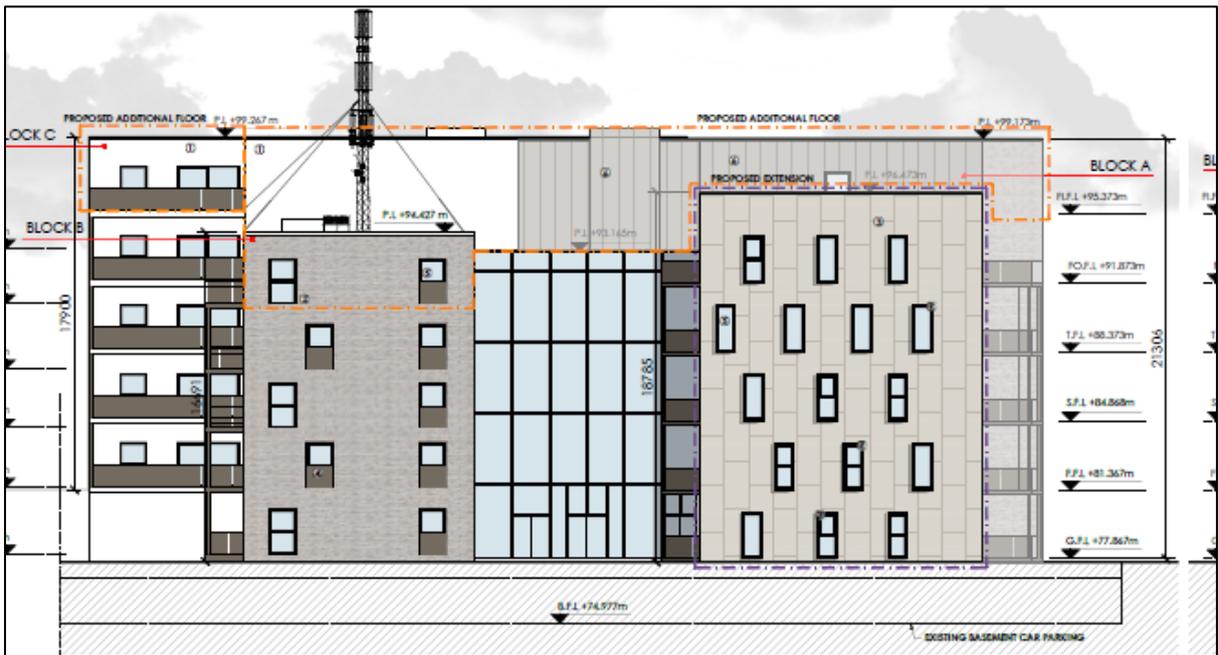


Figure 58.0 Proposed front (northern) elevation of Blocks A, B and C

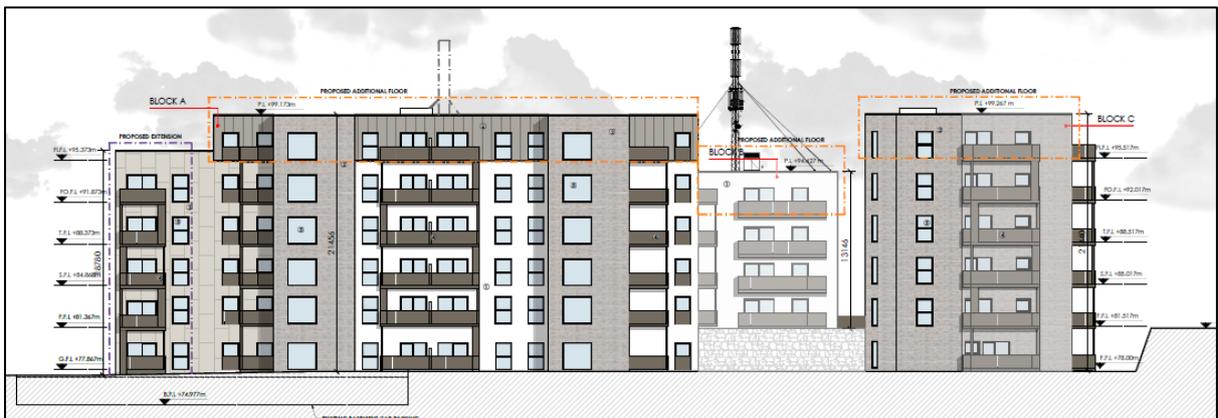


Figure 59.0 Proposed side (western) elevation of Blocks A, B and C

Proposed Floor Plans and Elevations for Block D

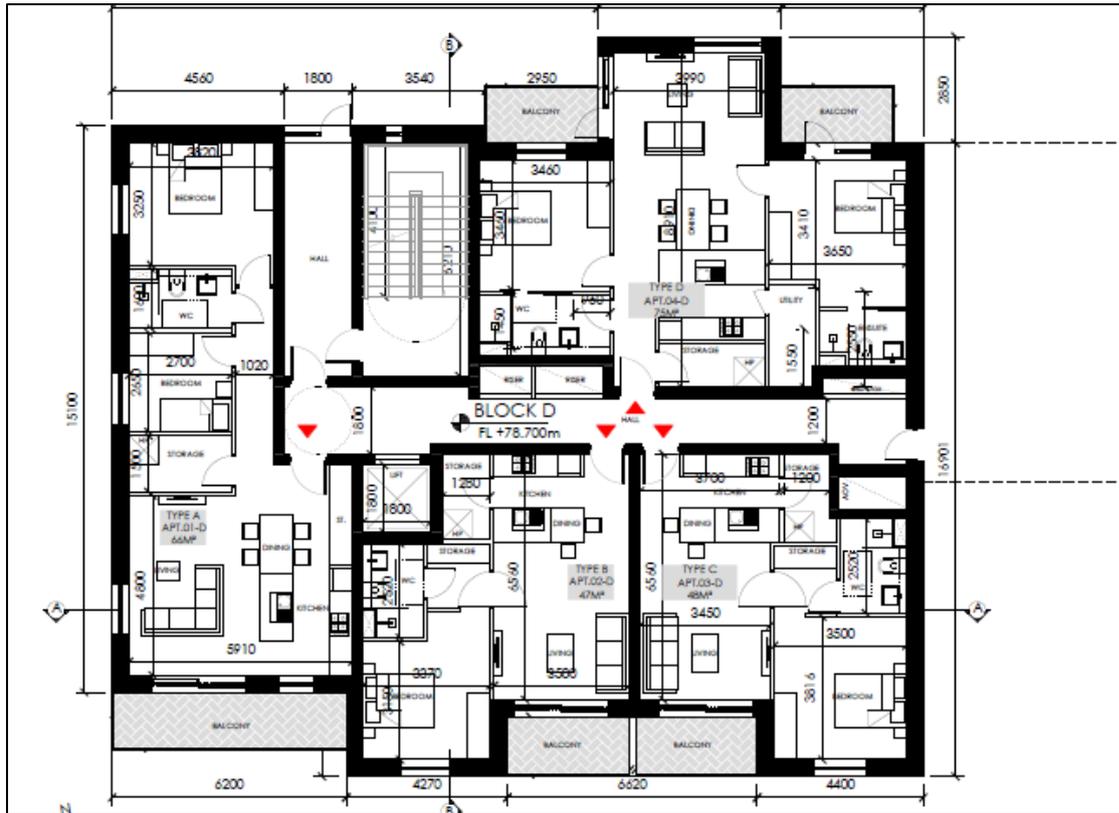


Figure 60.0 Ground floor plan of the proposed Block D

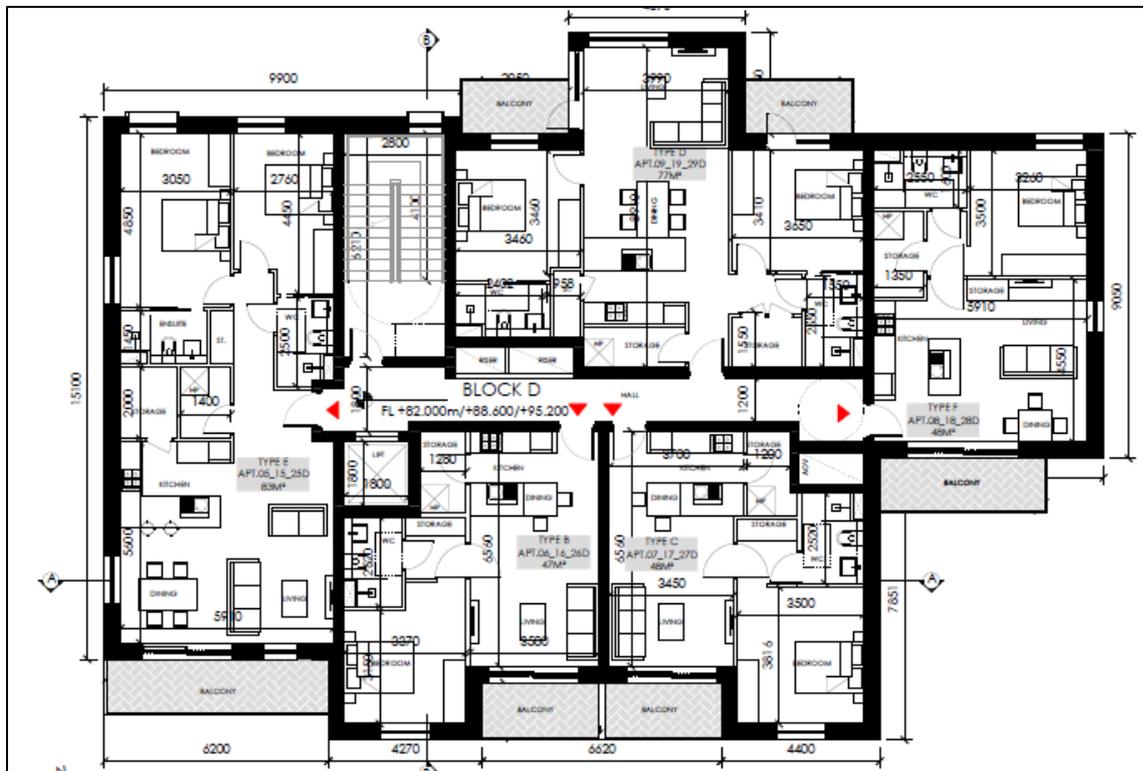


Figure 61.0 Typical First/Third and Fifth Floor Plan of the proposed Block D



Figure 62.0 Typical Second/Fourth Floor Plan of the proposed Block D



Figure 63.0 Front (northern) elevation of the proposed Block D

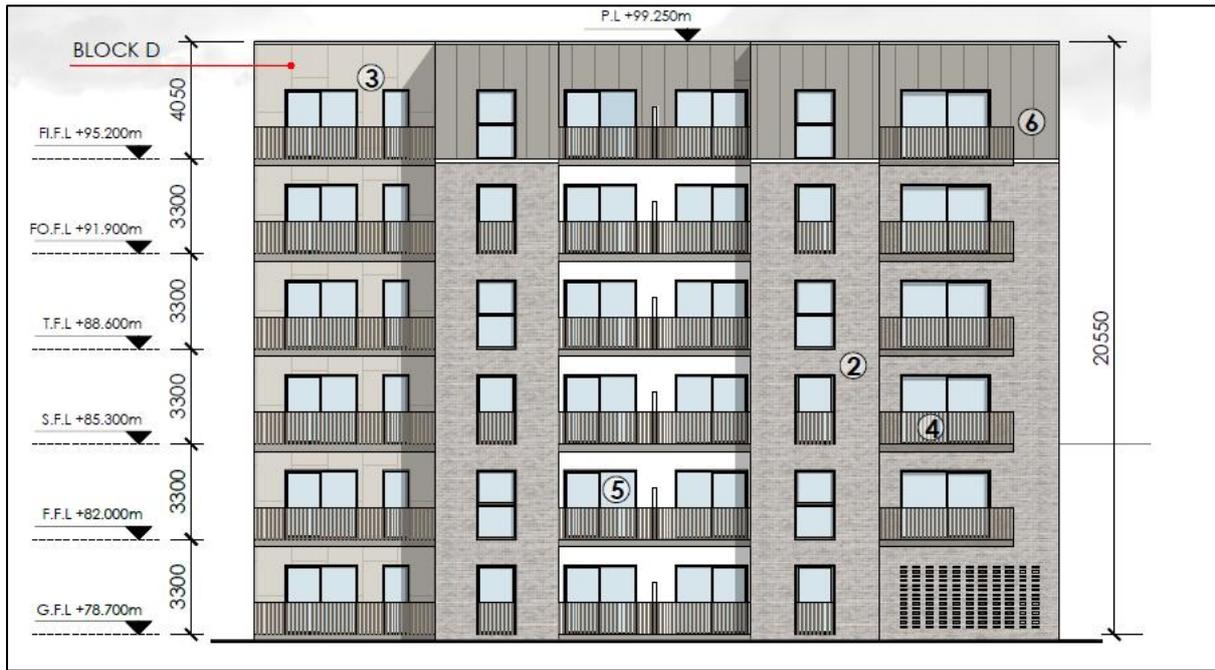


Figure 64.0 Rear (southern) elevation of the proposed Block D

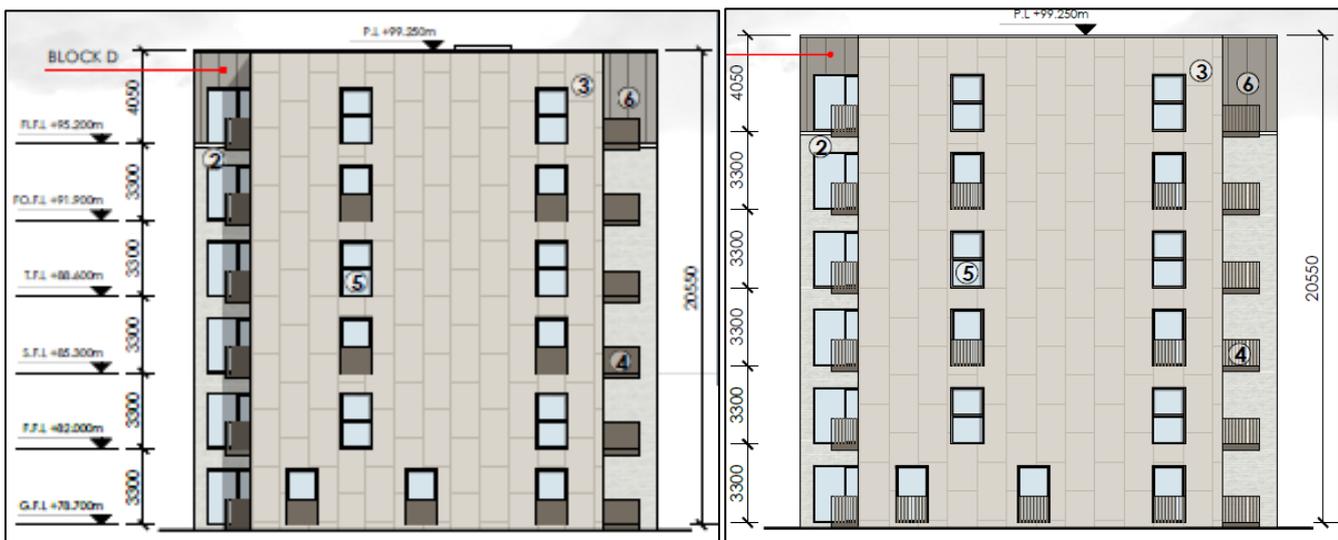


Figure 65.0 Proposed western (L) and eastern (R) elevations of the proposed Block D

The proposed development has been designed in order to address the previous reasons for refusal on the lands (issued under Reg. Refs. SD19A/03324 (ABP Ref. ABP-306409-20), SD12A/0327 (ABP Ref. ABP306399-20) and SD19A/0328) with particular emphasis on reducing the bulk, scale and mass of the proposed development whilst increasing the amenity of the residential units for future occupants. In this regard, the proposed development provides for 47% one bed units, 45% two bed units and 8% three-bedroom units with no single north facing units proposed and 61% of units proposed as dual aspect. All apartments meet or substantially exceed the floor space requirements as set out in the Design Standards for New Apartments, Guidelines for Planning Authorities (2020). It is submitted to South Dublin County Council, that the revised design proposal addresses the previous concerns in relation to amenity standards for future occupants and is in accordance with the proper planning and sustainable development of the area.

The form and scale of the proposed development has been revised in order to address concerns regarding visual amenity. The proposed design provides for an appropriate design response for the subject lands with Block A providing for a simpler form resulting in a significant reduction in the bulk and mass of the scheme which has reduced the visual impact of the proposed development. Whilst it is noted that Block A is proposed at 4-5-6 storeys, it is considered that the stepped approach in height from Block B at 5 storeys and a reduction in height at Block D to 6 storeys, ensures an appropriate form and scale of development has been achieved. The reduction in mass and bulk of the scheme is set out below and in the accompanying documentation prepared by HA Design Studio.

Block A has been reduced in mass with a simpler form proposed with an additional storey now proposed providing for a stepped height of 4-5-6 storeys. Block B is proposed at 5 storeys, Block C is proposed at 6 storeys whilst Block D, previously proposed at 7 storeys (Reg. Ref. SD19A/0328) is now reduced to 6 storeys with the form and mass of this block also reduced. The overall reduction in height, scale, bulk and mass results in an appropriate development for the site.

6.0 Planning Policy Context

This section of the statement will examine the planning framework, including national, regional and local, that informs the use and development of the subject land. Documents of note are as follows:

- Project Ireland 2040 – National Planning Framework (2018);
- National Development Plan 2018-2027;
- Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
- Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
- Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);
- Urban Design Manual – A Best Practice Guide 2009;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020);
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland, 2009;
- Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, 2019; and
- South Dublin County Development Plan 2016-2022;

6.1 Project Ireland 2040 – National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

The proposed development is representative of the form of development which is sought as per the provisions of the national planning framework. Moreover, we would note the following national policy objectives as per Project Ireland 2040:

- National Policy Obj. 3a** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*
- National Policy Obj. 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 Obj. 13** *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*
- National Policy Obj. 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.*

In addition to the above, the National Planning Framework also outlines that:

‘a new major policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.’

The proposed development is appropriately located within the existing suburban town of Clondalkin, and does not constitute urban sprawl. The National Planning Framework also encourages the growth in population and jobs in the counties surrounding Dublin. The proposed location of the site will ensure that growth is contained within the metropolitan boundary and will offer *‘improved housing choice, transport mobility and quality of life’*. The proposed development is consistent with the above as it involves the re-development of underutilised land which is in close proximity to existing facilities and public transport. The proposed development complies with the relevant National Policy Objectives identified in the National Planning Framework in Appendix 1 on pages 159 to 169.

6.2 National Development Plan 2018—2027

The National Development Plan 2018—2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government’s commitment to meeting Ireland’s infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

The subject development at Dolcain House, is considered to aid in meeting the targets and objectives of the National Development Plan through the more efficient use of an underutilised site within an existing built-up area, whilst providing the critical mass required to sustain and support public transport services. The proposed development is considered to reflect the type of sustainable development which is sought throughout National Policy with regards to the appropriate development of under-utilised sites.

6.3 Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018

These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out

in Project Ireland 2040 and the National Planning Framework.

These guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development.

In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. SPPR 1 goes on to outline the following in relation to this:

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.

The increased height and density proposed for the subject site is consistent with the above due to the subject site's proximity to the Luas and bus network serving the Clondalkin area. Further to this, the proposed development scores highly when assessed against the development management criteria set out in the consultation draft guidelines as, aside from being well served by public transport, it:

- Enhances the character, built environment and public realm of the area, featuring well considered high quality materials and appropriately responds to the lower scale residential development in the surrounding area;
- Makes a positive contribution to the legibility of the wider suburban area as it provides a new public pedestrian footpath which connects the subject site with the surrounding public footpath network in turn allowing for a greater degree of connectivity and permeability;
- Maximises access to natural daylight, ventilation and views due to the positioning of the blocks within the site and the internal configurations adopted; and
- Has limited impact in relation to overshadowing and loss of light due to its separation from existing residential developments in the surrounding area. The massing of the residential blocks has been carefully considered with appropriate set-backs adopted at upper floor levels.

Where a development complies with the Development Management Criteria as set out in the Urban Development and Building Heights – Guidelines for Planning Authorities, then the Planning Authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise. This is outlined in specific Planning Policy Requirement 3, and this policy then allows for the introduction of taller buildings into the landscape of the city which may have previously been refused by the Council through the development plan policy. This will further contribute to the delivery of more compact growth in our urban areas with the provision of increasing prevailing building heights. The proposed development for Prussia Street would provide a development that would satisfy the policy objectives set out in the above statutory guidelines.

It is important to note that these Specific Planning Policy Requirements contain national planning policy requirements which take precedence over the Local Authority's own Development Plan in an aim to break height limitations in development, and allow for the introduction of taller buildings into the landscape of Ireland.

It is considered that the proposed development would make a positive contribution to the urban neighbourhood and streetscape. The design approach adopted, which incorporates an appropriate transition in heights throughout the site from 4/5 to 6 storeys, and the mix of materials and finishes proposed breaks up the massing of the development and creates an added sense of visual interest. The proposed scheme is designed to a high architectural standards and would create a place of interest within the neighbourhood locality. The proposed scheme also addresses the Monastery Road Frontage in a positive manner, introducing increased activation at street level.

Given the above, the proposed development is considered appropriate in this instance

6.3.1 Development Management Principles

Section 3.1 of the Urban Development and Building Heights Guidelines states that planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

It is noted that the design of the proposed development has been informed by the policies and objectives of both national and local planning policy. The development complies with the policy provided and positively contributes to the development of the area. The subject site is located in close proximity to a large number of public transport routes, including a range of serviced Bus Stops along Monastery Road, serving route nos. 51x, 13, 68 and 69, and the Red Cow Luas Stop which within a comfortable walking distance, which results in the site being highly accessible and creates a stronger argument for the positioning of this development at the subject site.

6.3.2 Development Management Criteria

The guidelines state that applicants shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the following criteria:

'At the scale of the relevant city/town:

- *The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *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.'*

As previously noted, the subject site is located within close proximity to a number of high-quality public transport networks including Dublin Bus routes and the Red Cow Luas Stop. The proposal is of a high-quality design which will make a positive contribution to the area and create a visual interest in the streetscape. The proposed development has been designed to improve the visual quality and public realm of Monastery Road. The Architectural Design Statement prepared by Ha Design Studio as well as the Photomontage Imagery prepared by Digital Dimensions provides further details on the design of the proposed development and illustrate how the proposed development will sit comfortably within the existing and evolving streetscape/surrounding area. The scale and form of the proposed development responds to the scale of existing adjacent and planned developments, with the development being appropriately recessed from adjacent lower rise buildings and sensitive interfaces, creating visual interest in the streetscape, with high quality architecture and materials/finishes.

'At the scale of district/neighbourhood/street'

- *The proposal responds to its overall natural and build environment and makes a positive contribution to the urban neighbourhood and streetscape.*
- *The proposal is not monolithic and avoids long, interrupted walls of building in the form of slab blocks with materials/building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009).*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood'*

It is considered that the proposed development would make a positive contribution to the suburban neighbourhood and streetscape, introducing a high-quality development on an underutilised site within a suburban context. The proposed development is split across 4 no. blocks ranging in height from 4/5-storeys to 6-storeys. The stepping back of the upper floor levels of the atrium at Block A, the transition in heights between blocks and proposed buildings and the mix of materials and finishes breaks up the massing of the development and adds visual interest. The proposed scheme is designed to a high architectural standard and would create a place of interest within the neighbourhood locality. In addition, the proposed development provides for a new public footpath along its northern boundary, facilitating enhances permeability and connectivity whilst also providing a greater degree of integration between the proposed development its surrounding suburban environment.

In terms of flood risk, it is submitted that a Stage 1/2 flood risk assessment has been prepared by Lohan & Donnelly Consulting Engineers, which accompanies this application, and subsequently concludes that the site historically has no recorded flood events as noted in the OPW's historical flood maps and the likelihood of on-site flooding is deemed to be low.

Furthermore, it is noted that the proposed residential development is located on zoned and serviced suburban lands, and will provide for the sustainable and active use of a presently underutilised site. The development provides for suitably located residential within close proximity to a number public transport services and will provide for an appropriate mix of unit sizes which including one, two and three bedroom apartments which will cater for the needs of differing household sizes and types. Overall, it is considered that the proposal presents a significant improvement on the site when compared to the existing use of the site and is inconsistent with the surrounding land uses.

On the basis of the above, the proposed building heights are considered appropriate in this instance.

'At the scale of the site/building'

- *The form massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *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 of 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'.*

The proposed development has been carefully designed to maximise access to natural daylight, further details in this regard and comprised within the Architectural Design Statement prepared by Ha Design Studio and the Daylight and Sunlight Assessment prepared by Digital Dimensions, which demonstrates that the scheme as presented substantially complies with the relevant BER Guidelines.

'Specific Assessments'

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 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.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.'*

In response to the above considerations, it is noted that the proposed development adopts generous distances from the site boundaries so as to ensure that no local wind tunnel or downdraught effects occur. On this basis, it is not considered that an assessment of micro-climatic effects is required for the proposed scheme. Given the height of the existing blocks on site and the relatively conservative increase in building heights that are proposed, it is not considered that the proposed development would have an impact on telecommunication channels or air navigation.

A Bat Survey Report prepared by Altemar Environmental Consultants Ltd is enclosed with this application which states that no evidence of bat activity was noted within the buildings. No trees of bat roosting potential are to be felled as part of the proposal. No bats were noted emerging from the buildings

on site. No significant negative impacts on roosting animals are expected to result from the proposed redevelopment. Foraging activity within the area may be lost unless lighting is controlled. A post construction assessment of the light spill on site to ensure compliance with bat lighting guidelines will be carried out

It is further noted that a Design Statement is enclosed with the application as prepared by Ha Design Studio as well as an EIA Screening Statement which is comprised within the latter sections of this report and an AA Screening Report and Ecological Impact Assessment which is provided under a separate cover.

SPPR 3

Section 3.2 of the Urban Development and Building Heights Guidelines (2018) states that 'where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).

'It is a specific planning policy requirement that where;

(A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

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

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

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

In consideration of the above Specific Planning Policy Requirement, it is noted that there are a number of permitted developments within the surrounding area and in the South Dublin County Council administrative area more broadly which adopt increased building heights and densities in line with National and Regional Policy objectives. The proposed development included as part of this application ranges in height from 4/5 to 6 stores in height, which is considered appropriate given the sites surrounding context.

Upon review of the above guidelines, it is clear that there is a strong emphasis on increasing building heights in suitable locations, such as the subject site. We also reiterate that the application site is also within close proximity to numerous high-capacity, high-frequency public transport facilities, including the Red Cow Luas Stop. Further to this, it is also noted that a number of high-frequency bus services operate along Monastery Road. In this context it is considered that the proposal meets the criteria for increased building heights as set out in the Building Heights Guidelines.

6.4 Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016

The 'Action Plan for Housing and Homelessness' was published in July 2016 as part of the Government's Rebuilding Ireland initiative. This is a whole-of-Government plan which seeks to double residential construction output to 25,000 homes per year by 2020; deliver 47,000 units of social housing

by 2021; make the best use of existing housing stock; and lay the foundations for a stronger, more stable private rented sector. The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars'. Pillar 3, 'Build More Homes' encourages the development of large-scale strategic sites to provide private housing delivery. Pillar 4, 'Improving the Rental Sector', addresses the need to increase supply and support the development of a strong rental sector offering true choice for households.

We submit that the proposed development responds to a recognised need, at national level, for build-to-sell accommodation and is consistent with policy in this regard. The proposed development of additional accommodation within the Dublin Region will also aid in addressing the current and ongoing housing crisis.

6.5 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.

The subject site will be located within 780 metres of the Clondalkin Town Centre, which is accessible by Monastery Road to the north of the site. The Clondalkin Town Centre features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated in close proximity to the Red Cow Luas Stop which provides access to Dublin City Centre which has numerous amenities that can be enjoyed by prospective residents of the scheme.

6.6 Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009)

The Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009) updated and revised earlier guidance of 1999. These statutory guidelines, which were brought forward to improve the quality of homes and neighbourhoods, set out best practice design criteria and provide a robust framework in which proposals for residential development should be considered. They establish a series of high level aims for successful and sustainable development in urban areas.

The proposed development has been designed to address the provisions of these guidelines, as set out hereunder:

- The design of the proposed development responds appropriately to its locational context in terms of its scale, massing and architectural treatment. It will provide an appropriate form of development along Monastery Road, in accordance with the South Dublin County Development Plan 2016-2022 objectives and policies. The proposal provides for the regeneration of a currently underutilised and site in a sustainable manner, building on the footprint of a site of previous development.
- The location of the proposed development close to public transport routes will ensure good connectivity. Its location immediately north-west of the Red Cow Luas stop and the provision of 310 no. bicycle parking spaces on site will promote walking and cycling to and from the development and minimise the use of cars.
- By its nature, the proposed development will accommodate a diverse mix of residents due to the variety of one, two and three-bedroom units available, proximity to employment opportunities such as Clondalkin and Tallaght and the accessibility of Dublin City. Residents may also include workers in the nearby Clondalkin and Ballymount Industrial Estates, Tallaght Hospital, students of the T.U.D. – Tallaght campus, workers within the broader area and students attending Colleges and Universities in the broader area. In terms of layout, the provision of open space at ground level will facilitate significant levels of interaction.

- The proposed development, by reason of its location on an under-utilised brownfield site, together with its density and layout, will promote the efficient use of land and of energy, as well as its proximity to the Red Cow Luas stop aiding in the reduction of private car-dependency.
- The proposed development will include communal amenity spaces at ground floor level which are easily accessible and appropriately located. This provision will provide a distinct sense of place and improve activation and integration within the site.
- The proposed design provides for a high-quality development of purpose-built apartments assisting in reaching the Development Plan's goals of 137,948 housing units by 2022. The amenity spaces provided, coupled with the amenities provided by Clondalkin Town Centre, will afford a high standard of residential environment.

Having regard to the foregoing, it is considered that the proposed development would be consistent with the Sustainable Residential Development in Urban Areas Planning Guidelines (2009).

6.7 Urban Design Manual – A Best Practice Guide 2009

The '*Urban Design Manual – A Best Practice Guide, 2009*' is based around twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are '*a distillation of current policy and guidance and tried and tested principles of good urban design.*' This report reviews the proposed development in this context in an effort to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent land-uses.

This report reviews the proposed development in this context in an effort to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent properties.

(i) Context - How does the development respond to its surroundings?

The proposed development makes efficient use of existing office blocks that have been underutilised some time. With the construction of an additional 6 no. storey block (Block D), the development will respond to the subject site in a manner that is consistent and considered. As for the surrounding area, the proposed development consisting of 130 no. units comprising of a variety of one, two and three-bedroom units will add additional housing to an area currently zoned as 'RES' – Residential in the South Dublin County Development Plan 2016-2022. The proposed units which are dispersed throughout the existing and proposed blocks sit comfortably within the topography of the site and surroundings providing an appropriate density of development, whilst respecting the form and scale of existing built fabric on-site and within the surrounding area.

The form, architecture and landscaping of the proposed development have been informed, but not determined by the surrounding area. As indicated on the architectural drawings and discussed in the Architectural Design Statement, prepared by Ha Design Studio, submitted with this application, the development would be finished in materials of the highest quality to ensure it creates a distinct scheme with its own character while integrating with the existing built form which characterises the area.

The development will help to increase the pedestrian activity along Monastery Road, thus improving passive surveillance in the residential area and along the no. 68 and 69 Dublin Bus routes.

(ii) Connections - How well connected is the new neighbourhood?

The proposed development scheme has been designed to facilitate quality all-round access. The proposed development facilitates pedestrian, cyclist and vehicular movement throughout the development and is accessible by Monastery Road to the north of the site. The N7 is 410 metres south of the subject site providing a connection to Kildare to the west and Dublin City to the east. The site is 780 metres west of junction 9 of the M50 motorway providing access and connectivity to a large extent of the wider Irish road network.

As mentioned, the site is within walking distance of the Red Cow Luas stop providing a high-frequency service between Tallaght and Citywest and Dublin City Centre. Here, connections can be made in Heuston and Connolly train stations to access wider parts of the county and country, as well as a connection at Abbey Street and Marlborough Street Luas Stops where an opportunity to switch to the Green Line Luas is provided providing further access south-east of the county. To the west, the amenities and services of Clondalkin are within walking and cycling distance.

It is considered that the proposed residential density is appropriate to the site location in transport terms and will help support efficient public transport.

(iii) Inclusivity - How easily can people use and access the development?

The proposed development includes a variety of apartment types of varying sizes and configurations. All units in the development are accessible for disabled access. The proposed development presents a positive aspect to passers-by and pedestrians traversing the adjacent Monastery Road.

The development proposes a mix of one, two and three-bedroom units meeting a variety of housing needs for a range of households. The development will be accessible along Monastery Road to the north of the site by steps or ramp, this ensure that cyclists of those with mobility issues can access the site easily. The open space provided can be used by all ages, with specific play areas for younger and older children. The communal open spaces have been designed with everyone in mind, with footpaths widths connection each open space that can be used by everyone. Public seating and play areas mean that the open spaces are a place for everyone. All floors in the building are served by lift, as well as by stairs meaning that moving around the development will be accessible to all.

(iv) Variety - How does the development promote a good mix of activities?

The range of uses available within the development is limited by the residential zoning objective of the site however communal open spaces can facilitate a range of passive and active open space uses.

(v) Efficiency - How does the development make appropriate use of resources, including land?

The concept of efficiency and sustainable development are key components of the design approach adopted and this is pertinent in the efforts that have been made to make most efficient of existing building fabric. The South Dublin County Development Plan 2016-2022 seeks to encourage development on sites that existing in the already built footprint of Dublin. Currently on the site are three no. 4-5 storey blocks. The re-use of these blocks, along with the construction of a new block, will bring about a significant improvement to the site conditions, bringing the land back into a beneficial use. The redevelopment of this site for residential accommodation will significantly improve the physical environment and provide high-density accommodation on an underutilised site.

The proposed open spaces and sedum roofs are designed with Sustainable Urban Drainage Solutions (SuDS) in mind ensuring that water run-off from rainfall which can lead to pluvial flooding is mitigated. 61% of units in the development are proposed to be dual-aspect and includes no units that are north-facing and single-aspect. This ensures that all units receive adequate daylight.

The proposed density will make public transport a more viable option at this location and reduce the need for private cars.

(vi) Distinctiveness - How do the proposals create a sense of place?

The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of moderate scale on a brownfield site which is presently underutilised. The proposed residential development will bring more pedestrian traffic to the area with the proposed 130 no. units having the potential to house over 200 people helping to reactivate this section of the road. The development has the potential to be used as a landmark due to its scale at present. Coupled with an improved façade and building finishes, the site will help to contribute positively to the identity of the area on a site that is currently underutilised, transforming the site from a space to a place.

(vii) Layout - How does the proposal create people friendly streets and spaces?

The development priorities pedestrians and cyclists. Car parking is provided at surface and basement levels with the quantum of spaces provided being purposely restricted. The proposed parking area at surface level is to the east of the site boundary, away from the residential blocks. Ensuring that cars have a minimal presence is vital for creating places that are enjoyable by people, enforcing a sense of security. The provided open spaces are connected and accessible by footpath creating spaces that are void of cars and are people-centric. The development proposes a new dedicated cyclist and pedestrian ramp to the north of the site providing access directly onto Monastery Road.

(viii) Public Realm - How safe, secure and enjoyable are the public areas?

The open spaces of the proposed development ensure that both active and passive uses can be enjoyed wherein passive refers to sitting and relaxing and active referring to a space being used for play. As mentioned, the ground-floor parking has been placed to the north-east of the site and so is away from the open space areas, to be enjoyed by people. Residents of the development can enjoy the safety of passive surveillance as the blocks overlook the public open greenspace, all combining to ensure safe, secure and enjoyable public areas.

(ix) Adaptability - How will the buildings cope with change?

Adaptability of the design has been considered and it is proposed that all internal walls be constructed in a non-masonry system, thereby allowing future modifications to layouts to be readily implemented.

The proposed buildings will be thermally efficient, and it is proposed to use a centralised adaptable plant.

(x) Privacy and Amenity - How does the scheme provide a decent standard of amenity?

The proposed accommodation and the shared amenity spaces are designed to meet current design standards, as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018). In many areas, the minimum standards are exceeded such as the space requirements in units.

79 no. (61%) of the proposed units enjoy dual aspect and all have their living/kitchen spaces on the outer elevations of the building or fronting the communal amenity spaces. Appropriate acoustic insulation will be designed to prevent sound transmission from one unit to another and from areas of non-residential uses to residential uses. All apartments have access to open space at each block which features a mix of hard and soft landscaping and amenity spaces, including children's play areas. Every unit may access the communal open-space areas, the semi-privacy of these spaces create secure and overlook spaces.

The location of the development means that there is no direct overlooking of any other residential properties, with a considerable separation distance existing between the subject site and the housing estates to the north.

(xi) Parking - How will the parking be secure and attractive?

The development is provided with 78 no. on-site car parking spaces, including 5 no. car club spaces, which is considered appropriate given the sites proximity to the Luas and numerous bus/cycle routes. These car parking spaces, as well as the 310 no. bicycle spaces proposed, will be mostly accommodated at basement level. Vehicular and parking access will be via basement access to the east of the site. It is noted that a separate pedestrian and bicycle access to the basement is provided to along the north-western boundary of the subject site, off Monastery Road.

(xii) Detailed Design - How well thought through is the building and landscape design?

The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance. Care has been taken over

the siting of flues, vents, bin storage and utility services.

The development features a number of primary landscaped communal open space areas, the combined size of which is in excess of the minimum standards set out within the 2020 Apartment Guidelines. Please refer to the architectural drawings and design statement, prepared by Ha Design Studio, and the Landscape Plan and Landscape report prepared by Jane McCorkell Landscape Architects, which accompany this application.

6.8 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)

The proposed development has been designed to be fully comply with the standards set out in *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities*, published by the Department of the Environment, Community and Local Government in December 2020. These guidelines replace the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*. The 2020 Guidelines update the previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland, taking account the percentage of co-living accommodation that has been built in recent years.

An assessment against each of the applicable standards is provided below and overleaf:

Housing Mix

With regards to housing mix, Section 2.18 of the 2020 Apartment Guidelines, suggests that there is a need for greater flexibility, removing restrictions that result in different approaches to apartment mix on one hand, and other forms of residential accommodation on the other.

The 2020 Apartment Guidelines provides the following guidance in respect of housing mix:

Specific Planning Policy Requirement 1

Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

The proposed development provides the following mix of units which have been assessed against the provisions of the Sustainable Urban Housing: Design Standards for New Apartment Guidelines for Planning Authority's (2020):

- 61 no. one-bedroom apartments = (47%);
- 59 no. two-bedroom apartments = (45%); and
- 10 no. three-bedroom apartments = (8%)

On the basis of the above, the proposed development is compliant with the provisions of the guidelines with regards to unit mix.

Minimum Overall Apartment Floor Area

Specific Planning Policy Requirement 3 sets out minimum apartment floor areas. The overall apartment floor area sizes required for apartment units area as follows:

- | | |
|--|---------------|
| • <i>Studio apartment</i> | <i>37sq.m</i> |
| • <i>1-bedroom apartment</i> | <i>45sq.m</i> |
| • <i>2-bedroom apartment (3 persons)</i> | <i>63sq.m</i> |
| • <i>2-bedroom apartment (4 persons)</i> | <i>73sq.m</i> |

All apartments in the proposed development comply with and exceed the required minimum standards, as shown in Table 2.0 below.

Minimum Overall Required Floor Areas		
Unit Type	Requirement	Floor Area of Proposed Units
One Bedroom	45sq.m	47sq.m – 54sq.m
Two Bedroom (3 person)	63sq.m	66sq.m-69sq.m
Two Bedroom (4 Person)	73sq.m	75sq.m-83sq.m
Three Bedroom	90sq.m	96sq.m-99sq.m

Table 2.0 Table showing the required overall floor areas provided for each apartment type

The requirement that the majority of all apartments in a proposed scheme of 10 or more units exceed the minimum floor area standards by a minimum of 10%, set out in Section 3.8 applies to Strategic Housing Development schemes, pursuant to Specific Planning Policy Requirement 8(iv). The applicable requirement reads as follows:

‘The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%)’

Compliance is illustrated in the table below:

Unit Mix:	Number of Apartments	Cumulative Min Floor Area
47% 1-bed units	61	61 x 45sqm = 2,745sqm
45% 2-bed units	59	59 x 73sqm = 4,307sqm
8% 3-bed units	10	10 x 90sqm = 900sqm
Total 100%	Total 130 apartments	Total 7,925sqm
1-bed + 10% min area	6	6 x 4.5sq.m = +27sq.m
2-beds + 10% min area	59	59 x 7.3sqm = +430.7sq.m
Total +10% of majority	Total 66 apartments	+457.7sqm
Total Required Minimum Floor Area		7,925sqm + 457.7sqm = 8,382.7sqm
Unit Types	Proposed Apartment Sizes	Cumulative Floor Area
Blocks A, B and C		
1-bed unit – Type A (6no.)	48sqm each	288sqm
2-bed unit – Type B (6 no.)	79sqm each	474sqm
1-bed unit – Type C (1 no.)	49sqm each	49 sqm
1-bed unit – Type D (6 no.)	50sqm each	300sqm
1-bed units – Type E (6 no.)	50sqm each	300sqm
3-bed units – Type F (6 no.)	99sqm each	594sqm
2-bed units – Type G (6 no.)	75sqm each	450sqm
2-bed units – Type H (6 no.)	79sqm each	474sqm
2-bed units – Type I (5 no.)	76sqm each	380sqm
1-bed units – Type J (5 no.)	54sqm each	270sqm
2-bed units – Type K (1 no.)	83sqm each	83sqm
1-bed units – Type L (1 no.)	47sqm each	47sqm
1-bed units – Type M (1 no.)	49sqm each	49sqm
1-bed units – Type N (1 no.)	49sqm each	49sqm
1-bed units – Type O (2 no.)	49sqm each	98sqm

1-bed units – Type P (4 no.)	52sqm each	208sqm
2-bed units – Type Q (4 no.)	78sq.m each	312sqm
3-bed units – Type R (4 no.)	96sq.m each	384sqm
2-bed units – Type S (5 no.)	80sq.m each	400sqm
2-bed units – Type T (5 no.)	75sq.m each	375sqm
1-bed units – Type U (5 no.)	47sq.m each	235sqm
1-bed units – Type V (5 no.)	50sq.m each	250sqm
2-bed units – Type W (5 no.)	75sq.m each	375sqm
2-bed units – Type X (2 no.)	78sq.m each	156sqm
2-bed units – Type Y (2 no.)	69sq.m each	138sqm
1-bed units – Type Z (1 no.)	48sq.m each	48sqm
Block D		
2-bed units – Type A (1 no.)	66sq.m each	66sqm
1-bed units – Type B (6 no.)	47sq.m each	282sqm
1-bed units – Type C (6 no.)	48sq.m each	288sqm
2-bed units – Type D (5 no.)	77sq.m each	385 sqm
2-bed units – Type E (5 no.)	83sq.m each	415sq.m
1-bed units – Type F (5 no.)	48sq.m each	240sq.m
2-bed units – Type G (1 no.)	75sqm each	75sqm
Total Floor Area of Proposed Unit Types		8,536 sqm (which exceeds the minimum floor area outlined above)

Table 3.0 Table outlining compliance with Section 3.8(a) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020

Minimum Floor Areas, Minimum Widths and Minimum Aggregate Floor Areas for Living/Dining/Kitchen and Bedrooms

Appendix 2 to the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (2020) also outlines minimum aggregate floor areas for living/dining/kitchen rooms; minimum widths for the main living/dining rooms; minimum bedroom floor areas/widths and minimum aggregate bedroom floor areas.

The 2020 Guidelines require the following minimum aggregate floor areas in relation to Living/Dining/Kitchen Areas:

- One Bedroom *23sq.m, minimum width 3.3m*
- Two Bedroom (3 person) *28sq.m, minimum width 3.6m*
- Two Bedroom (4 person) *30sq.m, minimum width 3.6m*
- Three Bedroom (5 Person) *34sq.m, minimum width 3.8m*

The 2020 Guidelines require the following minimum aggregate floor areas, minimum widths and minimum aggregate floor areas in relation to bedrooms.

Minimum Floor Areas and Minimum Widths - Bedrooms		
Unit Type	Minimum Width Required	Minimum Floor Area
Single Bedroom	2.1m	7.1sq.m
Double Bedroom	2.8m	11.4sq.m

Table 4.0 Table showing the minimum aggregate floor areas and minimum widths for bedrooms

The overall aggregate bedroom floor areas for apartment unit areas is required as follows:

- One bedroom - *11.4sq.m*
- Two Bedrooms (3 person) – $13 + 7.1sq.m = 20.1sq.m$

- Two bedrooms (4 person) – $11.4 + 13\text{sq.m} = 24.4\text{sq.m}$
- Three bedrooms – $11.4\text{sq.m} + 13\text{sq.m} + 7.1\text{sq.m} = 31.5\text{sq.m}$

The proposed development comprises of 130 no. apartment units, of which 61 no. one-bedroom units, 59 no. 2 bedroom units and 10 no. 3 bedroom units. As outlined in the apartment layouts included in Drawing Nos. 19-001-PL-103, 18-001-PL-105, 18-001-PL-106 and 18-001-PL-107 All apartment units are generally compliant with the various floor area and floor width standards, and in most instances are in excess of the required minimum standards set out in the guidelines for new apartments as illustrated in the accompanying floor plan drawings.

Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance with regards to dual aspect apartments, and states the following:

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

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

The proposed development provides 79 no. dual aspect apartments, accounting for 61% of the 130 no. apartment units proposed, which complies with the above requirements. In addition, the proposed single aspect apartment units have been orientated to face in a southern, eastern or western direction to allow for maximum light exposure for each individual apartment throughout long periods of the daylight hours with no single aspect northern facing units proposed. This is consistence with the 2018 Guidelines which recommend, in Section 3.18, that single aspect apartments be orientated to face south, east or west, to allow for maximum sunlight exposure.

Internal Storage

The 2020 Guidelines provides minimum storage space requirements in new apartments. They are as follows:

- *Studio* 3sq.m
- *One Bedroom* 3sq.m
- *Two Bedroom (3P)* 5sq.m
- *Two Bedroom (4P)* 6sq.m
- *Three of more Bedrooms* 9sq.m

The storage areas for each of the different apartment types are as follows:

- One bedroom apartments – range between 3sq.m – 3.2sq.m
- Two bedroom (3P) apartments – 5sq.m
- Two bedroom (4P) apartments – range between 6sq.m – 6.4sq.m
- Three bedroom apartments – 9sq.m

It is submitted that the proposed apartments have been provided with an adequate amount of storage space as per the standards set out in the guidelines.

Private Open Space

The Guidelines provides minimum private open space requirements in new apartments. They are as follows:

- Studio 4sq.m
- One Bedroom 5sq.m
- Two bedrooms (3P) 6sq.m
- Two Bedrooms (4P) 7sq.m
- Three or more Bedrooms 9sq.m

The private open space areas for each of the different apartments are as follows:

- One bedroom apartments – range between 5sq.m – 11.6sq.m
- Two bedroom (3P) apartments – range between 7.6sq.m - 9sq.m
- Two bedroom (4P) apartments – range between 7sq.m – 12sq.m
- Three bedroom apartments – range between 9sq.m – 11 sq.m

The quantum of private amenity space provided meets of substantially exceeds the minimum standards for those apartments which are afforded private amenity space. There are a total of 2 no. apartments of the 130 no. provided comprise Juliette balconies, which do not comply with the standards as set out within the 2020 Apartment Guidelines. These are located at first floor level of Block B (Apt. 05-B and APT. 06-B). In this context, we refer to Section 3.39 of the 2020 Apartment Guidelines which states the following:

'For building refurbishment schemes on sites of any size of urban infill schemes on sites of up to 0.25ha, private amenity space requirements may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality.'

Given that the proposed development provides for the upgrade, refurbishment and re-use of existing office buildings which will facilitate the provision of quality, sustainable housing or individuals and families who are in need of it. The proposed development will effectively revitalise the subject site through the provision of well-planned and designed residential units, which will rejuvenate the site and its immediate surrounds.

On the basis of the above, and in consideration of the minimal number of units effected, we request that a relaxation is allowed in this instance give the nature of the scheme and the large areas of communal open space allocated for all apartments.

Communal Amenity Space

The Guidelines set out minimum communal amenity space requirements in new apartments. They are as follows:

- Studio 4sq.m
- One Bedroom 5sq.m
- Two Bedrooms (3P) 6sq.m
- Two Bedrooms (4P) 7sq.m
- Three or more Bedrooms 9sq.m

The communal amenity space requirements for the proposed development are thus as follows:

Communal Amenity Space Requirements			
Unit Type	Required floor areas for communal amenity space	No. of Apartments	Communal amenity space required
One Bedroom	5sq.m	61 no.	305sq.m

Two Bedroom (3P)	6sq.m	3 no.	18sq.m
Two Bedroom (4P)	7sq.m	56 no.	392sq.m
Three Bedroom	9sq.m	10 no.	90sq.m
Total Communal Amenity Space Required			805sq.m

Table 5.0 Table showing the provided floor areas for communal amenity spaces per apartment type

The guidelines also outline the following in relation to communal amenity space:

'Communal amenity space may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year.'

Based on the above requirements the subject scheme requires 805sq.m of communal amenity space. The development includes a total of 2,185 sq.m of open space, including 2 no. principle open amenity areas which includes appropriate landscaping, seating and children's play facilities. The proposed development has been designed to ensure the open space areas serving the development receive adequate levels of sunlight to reach communal amenity space throughout the year.

Floor to Ceiling Height

The 2020 Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. The proposal largely complies with the Guidelines in this regard. The ground floor level units in Block D fall slightly short of this standard providing for floor to ceiling heights of 2.5m, however due to the overall design of the proposed block in respect of the standard of accommodation proposed and the access to light available, it is considered that this minimal shortfall should be considered acceptable.

Lift and Stair Cores

The 2020 Guidelines outline that subject to compliance with the dual aspect ratios specified in these guidelines and building regulations particularly in relation to fire safety, it is a specific planning policy requirement that up to 12 apartments per floor per individual stair/lift core may be provided in apartment scheme.

The proposed development complies with this aspect of the guidelines, with a maximum of 9 apartments proposed per floor.

Security Considerations

Section 3.40 of the Guidelines recommend that in order to ensure visitor and occupant safety natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks. Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths.

The proposed development has been designed in a manner that allows for maximum natural surveillance throughout the development site, with windows overlooking all external communal spaces whilst also providing patios/balconies to apartments at ground floor level that front onto internal footpaths and open space areas and is therefore consistent with the Guidelines in this regard.

Bicycle Parking

The Guidelines seeks that the design of apartment schemes should ensure that bicycle parking spaces are located to be conveniently accessible to residents, both in terms of proximity to access points to

apartments and routes to the external road / street network. The following requirements are also specified in relation to quantity:

'Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.'

Based in the above requirements, the subject scheme requires 209 no. resident bicycle parking spaces and 65 no. visitor bicycle parking spaces. The development includes the provision of secured bicycle storage at basement and surface levels with 310 no. bike spaces proposed in total. It is considered that the proposed development complies with all the required standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

Childcare Facilities

Having regard to the Planning Guidelines for Childcare Facilities (2001), the provision of one child-care facility (equivalent to a minimum of 20 child spaces) for every 75 dwelling units is recommended to be provided. Furthermore, Section 4.7 of the Apartment Guidelines (2018), state that the threshold provision for any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the geographical distribution of childcare facilities and the emerging demographic profile of the area. It is also considered that **one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision.**

Having regard to the above, it is noted that the proposed development provides for a total of 69 no. two and three bedroom apartment units (excluding one bedroom units as per the guidance above), and therefore falls below the 75 no. unit threshold for the provision of a childcare facility. The proposed development is therefore considered appropriate in this regard.

6.9 Design Manual for Urban Roads and Streets (2013)

The proposed development has been designed having regard to the Design Manual for Urban Roads and Streets (2013). The Manual includes design guidance and standards for constructing new and reconfigured existing urban roads and streets, whilst also setting out practical design measures to encourage more sustainable travel patterns in urban areas. The proposed development provides for a designated vehicular access on site, availing of the existing site entrance, and proposes the provision of a new designated pedestrian and cyclist access point at the north-western boundary of the subject site.

We submit that an assessment against the Design Manual for Urban Roads and Streets (2013) is included in the Traffic and Transportation Assessment Report, prepared by Martin Rodgers Consulting Ltd. and Lohan Donnelly Consulting Engineers.

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

The proposed development has been designed having regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Please refer to the Stage 1/2 prepared by Lohan & Donnelly Consulting Engineers, which accompanies this application and concludes that the site is classified as Flood Zone C and therefore has low probability of experiencing a flood. This report is provided under a separate cover.

6.11 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new

housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

The following definition of Childcare is included in the Guidelines:

In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.

We note that under the 'Communal Facilities' section of the Design Standards for New Apartments Guidelines for Planning Authorities (2018), the provisions surrounding childcare facilities are outlined. It is recommended that one childcare facility be provided for every 75 no. dwelling units. The current 130 no. units proposed in this development falls short of this as the guidelines noting that one-bedroom and studio units are not considered to contribute to a requirement for any childcare provision. Excluding one-bedroom units, the development proposes 69 no. units comprising two and three-bedroom units, resulting in the development falling under the threshold of 75 no. units for providing childcare facilities.

Notwithstanding the above guidance, it is submitted that there are a number of existing childcare facilities within the area surrounding the subject site which serve the broader catchment area.



Figure 66.0 Location of childcare facilities (orange stars) in relation to subject site (red star).

We note that there are a number of childcare facilities in close proximity to the subject site, as detailed in Figure 66.0 above and Table 6.0 below providing a sufficient childcare service for the area.

Name	Address	Proximity to Subject Site	Total Places
Footprints Montessori & Afterschool	Clondalkin Leisure Centre, Old Nangor Rd, Clondalkin, Co. Dublin	520m north-west	44 ECCE 40 Afterschool (Never Together)
Bright Sparks Montessori & Daycare	18A St Anthony's Ave, Brideswell Commons, Dublin, D22 RX34	850m west	45
The Village Daycare & Montessori	64 Laurel Park, Bushelloaf, Dublin, D22 FD37	820m north-west	76
Bambi's Pre-School	Green Park Shopping Centre, 3 St John's Dr, Gibraltar, Dublin 22, D22 E221	1.6km west	22
Little Gems Childcare	Commons Rd, Brideswell Commons, Dublin 22, D22 K5Y6	1.3km west	60
Lilliput Lane Creche and Montessori	29 Boot Rd, Brideswell Commons, Dublin, D22 W3F2	1km south-west	40
Oakview Village - Clondalkin	Clondalkin Civic Centre, South Dublin County Council, Clondalkin, Co. Dublin	1km north-west	48
Meadows Pre-School	17 Monksfield Meadows, Knockmitten, Dublin, D22 XW72	600m north-east	34
Little Scholars	93 Monksfield Heights, Redcow, Dublin, D22 KT91	600m north-east	17

Table 6.0 List of childcare facilities with distance from subject site and total number of places.

6.12 Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland (2009)

The purpose of the Smart Travel policy is to provide alternative to the use of the car through improved public transport services and investment in cycling and sustainable modes of transport. Within the above noted document, the Government has committed to reduce the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase. The policy document states that:

‘to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility’

The five key goals of this transport policy document are as follows:

- Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport;
- Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks;
- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions;
- Reduce overall travel demand and commuting distances travelled by the private car; and,
- Improve security of energy supply by reducing dependency on imported fossil fuels.

The Smarter Travel Plan also provides that local authorities should ensure safe walking and cycling routes to and from schools and other educational institutions are identified and implemented.

The proposed development complies with the key goals outlined within Smarter Travel: A Sustainable Transport Future. As noted in the preceding sections of statement of consistency and planning report, the proposed residential development provides for a reduced quantum of car parking on-site and as such will contribute to a reduction in the use of the private car for commuting. It is further submitted that the subject site is located within c. 820 metres of the Red Cow Luas Stop, which offers high frequency services with links to Tallaght Hospital, Citywest, and Dublin City Centre where passengers have the opportunity to use Heuston Station, Connolly Station and to switch to the Cross City LUAS service expanding connections to Cabra and Cherrywood. A number of bus routes use the Red Cow Luas as a transport hub with Dublin Coach providing services to Dublin Airport, Dundrum, Naas, Portlaoise, Cork, Waterford and Limerick. The site is served also by Dublin Bus routes: 51X, 13, 68 and 69 with the latter two having stops immediately north of the site.

Further to the above, the proposed development encourages cycling with 310 no. cycle parking spaces provided to serve both residents and visitors to the proposed scheme. 254 no. of the proposed bicycle parking spaces are located at basement level, with an additional 56 no. spaces provided at surface level. Surfaces and pathways throughout the site are arranged to safely accommodate cyclists.

6.13 Regional Spatial and Economic Strategy for the Eastern and Midland Region, June 2019

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (DRSES) was published in June 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level, it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

The RSES places Clondalkin within the South-West Strategic Corridor (Kildare line/Luas red line) which has a population capacity in the short to medium term of 66,000. A key aim is to unlock the development

capacity of strategic development areas within the Dublin metropolitan area. The following Regional Policy Objective supports the proposed development:

'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.'

The proposed development is consistent with the above as it will provide housing to accommodate the population increase expected in South-West Strategic Corridor, and Clondalkin more specifically, moving forward. As well as this the proposal will facilitate the consolidation and re-intensification of a brownfield site to provide high density and people intensive uses within an existing built-up area of Dublin.

6.14 South Dublin County Development Plan 2016-2022

6.14.1 Core Strategy

Set out in Chapter 1 of the South Dublin County Development Plan 2016-2022 is the 'Core Strategy', which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels.

The following policies and objectives set out in the 'Core Strategy' are relevant to the application site:

Policy CS1: *It is 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.*

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).

Policy CS2: *It is the policy of the Council to support the sustainable long term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.*

CS2 Objective 4: To promote and support the regeneration of underutilised industrial areas within areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led regeneration).

CS2 Objective 6: To promote higher residential densities at appropriate locations, adjacent to town centres or high-capacity public transport nodes (Luas/Rail).

The objective of the 'Core Strategy' is to focus residential-led development to areas with capacity to absorb more intensified forms of development that support the long-term growth of the Metropolitan Consolidation Towns of which Clondalkin has been identified as. The 'Core Strategy' makes particular reference to higher residential densities being supported at appropriate locations in close proximity to town centres or high-capacity public transport nodes, noting underutilised lands, adjacent to LUAS and Rail services as priority sites.

The proposed development will provide for the intensification of an otherwise underutilised office-use site that is zoned as 'RES' – Residential in the Development Plan and is well served by high-capacity public transport services, in terms of the Red Cow LUAS stop, which is south-east of the site, and is less than 1 kilometre west of the town centre of the Metropolitan Consolidation Town of Clondalkin. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy' as set out in the South Dublin County Development Plan 2016-2022.

6.14.2 Zoning

Under the South Dublin County Development Plan 2016-2022, the subject site is zoned 'RES', the objective of which is 'To protect and/or improve residential amenity' (refer to map in Figure 73.0 below). Land uses permitted in principle in this zoning consist of the following:

*'Housing for Older People, Nursing Home, Open Space, Public Services, **Residential**, Residential Institution, Retirement Home, Shop-Local, Traveller Accommodation'*

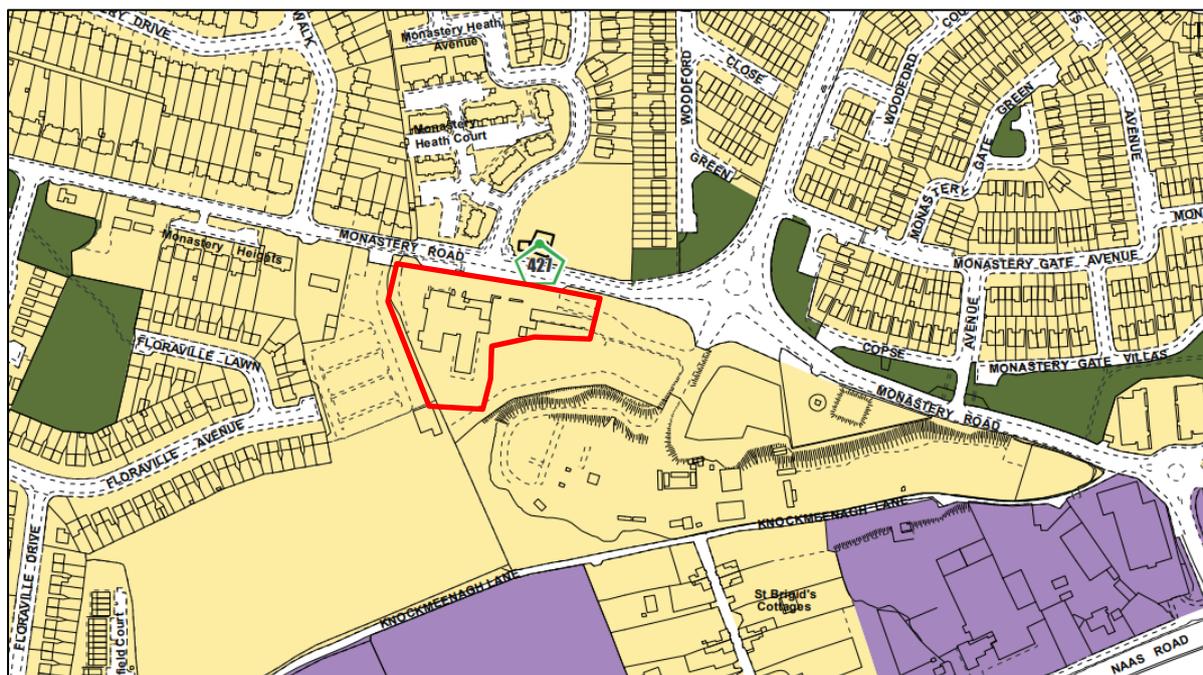


Figure 67.0 Extract from South Dublin County Development Plan 2016-2022 zoning Map No. 5 showing the application site (outlined in red) within lands with Zoning Objective 'RES'

The 'RES' zone as part of the South Dublin County Development Plan 2016-2022, aims to increase housing units in established areas through sustainable intensification by providing quality housing to the growing South Dublin population and on the basis of the above, a residential development providing housing, both private and social, would be permissible.

Section 2.0 'Housing' in the South Dublin County Development Plan 2016-2022 outlines how the Council aims to deliver new housing through sustainable intensification, focussing expansion at locations that can make the best use of existing infrastructure such as high-quality public transport and social infrastructure. Section 2.1.0 'Housing Strategy' recognises that based on projections in population and housing, South Dublin County will require an additional 32,132 housing units between the year 2015-2022. Of the 8,303 social housing units that will be required by the county, 2,000 of these will need to be delivered through Part V.

Policy H8: *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 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 6: To apply the provisions contained in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) relating to Outer Suburban locations, including a density range of 35-50 units per hectare, to greenfield sites that are zoned residential (RES or RES-N) and are not subject to a SDZ designation, a Local Area Plan and/or an approved plan, excluding lands within the M50 and lands on the edge or within the Small Towns/ Villages in the County

The development proposed for the application site is a strategic housing development, on an otherwise underutilised office site that is well served by high-capacity public transport services, which include the Red Cow LUAS stop and Dublin Bus services, located to the north and south-east of the application site offering direct links to Dublin City Centre and the wider Dublin area. The application site is also within close proximity Clondalkin Town Centre (780 metres east of the town), where there is a variety of recreation, education, commercial, employment and retail facilities.

6.14.3 Housing

A set out in Chapter 2 of the South Dublin County Development Plan 2016-2022, a core objective is to provide new housing of good quality, with a focus on the creation of sustainable new communities at locations that can be well served by high quality public transport, with a particular focus on the intensification of infill and brownfield lands with links to existing transport services. It is noted in this section of the development plan that South Dublin County Council will require 32,132 no. additional housing units over the period from 2015 to 2022, and the 'Interim Housing Strategy' forecasts that 8,303 no. social housing units will be required during this period as well, with approximately 2,000 housing units being delivered through Part V of the Planning and Development Act 2000 (as amended).

The following development plan policies are relevant to the proposal on the subject site:

Policy H2: *It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*

Policy H6: *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.*

Policy H7: *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).*

Policy H8: *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.*

Policy H9: *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.

Policy H11: *It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*

Policy H13: *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.*

Policy H14: *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.*

Policy H15: *It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.*

The objective for housing in the South Dublin County Council administrative area is provide high quality residential development that contributes to the communities. In this regard housing in 'RES' zoned lands are to respect the context of their surroundings in order to not impose visually on the landscape while if possible, adding to the streetscape of an area. Developments should comply with the Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance.

The proposal for the site is to construct a residential development. The proposed 4 no. blocks have been designed and scaled to respect the established development within the surrounding whilst providing a layout that allows an adequate provision of surveillance over public spaces within the application site. Furthermore, the proposed apartment units have been designed to comply with the varying quantitative standards for residential development as set out in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*. See section 6.8 for further details regarding the applicable standards.

The proposed development provides a housing choice in a suitably located area, offering a variety of apartment options on an otherwise underutilised brownfield site and is therefore consistent with the housing objectives set out in the Development Plan.

6.14.4 Building Height

It is stated in Section 5.1.5 of the South Dublin County Development Plan 2016-2022 that varied building heights are supported for proposed developments within urban centres and regeneration zones, and are recognised as playing a key role in creating a sense of place, urban legibility and visual diversity. It is noted in this section of the development plan that proposals for building in excess of five-storeys in height will only be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones in accordance with Local Area Plans or SDZ Planning Schemes.

Policy UC6: *It is policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.*

UC6 Objective 1: To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.

UC6 Objective 2: To ensure that higher buildings in established areas take account of and respect the surrounding context.

UC6 Objective 3: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme.

The subject site is situated within 'RES' – Residential area, which under the current development plan is designated for building heights up to five-storeys and allows for up to seven-storeys at landmark locations.

The proposed development adopts landmark components consistent with the above direction. Although the proposed development exceeds the recommended building height included in the South Dublin County Development Plan 2016-2022, we consider that the building heights of 6 no. storeys of Block D is consistent with the buildings proposed to be retained on site, Blocks A and C, which are also 6 no. storeys high. Block D's proposed height of 6 no. storeys is in keeping with heights already permitted on the subject site and so we submit that this would be an appropriately scaled building and is compliant with the Development Plan's guidelines.

6.14.5 Landscaping / Public Open Space / Children's Play

Section 11.3.1 of the South Dublin County Development Plan 2016-2022 requires that a detailed landscape plan be provided that outlines the extent of open space and treatments within residential and mixed use developments of 10 units and above. In this regard we would note that a Landscape Master Plan has been prepared by Jane McCorkell Landscape Architects, to accompany this planning application. The Master Plan provides comprehensive detailing of the proposed landscaping and treatment for the proposed development site. The primary objective of the landscape Master Plan is to create unity of design through the language of form, with the incorporation of geometric forms of acute and oblique angles, which will dictate intimate and active spaces.

In addition, the development plan requires that 10% of the total site area for residential developments in 'RES' zoned lands are to be allocated to public open space, and in the case of residential developments exceeding 50 units provision for a children's play areas will be required. The site comprises of an area of approximately 0.81ha and so the minimum open space required on the site is 810sq.m. Plans for the site include open space of c. 2,185sq.m, 810 sq.m of which is designated as public open space making it compliant with the open space requirements of the South Dublin County Council Development Plan 2016-2022. Please refer to the Landscape Master Plan prepared by Jane McCorkell Landscape Architects for comprehensive detailing in regards to the open space provisions, landscaping treatment and details regarding the proposed playspaces.

6.14.6 Car Parking and Traffic

Car Parking

The South Dublin County Development Plan 2016-2022 requires any new development provide a maximum of car parking spaces depending on the location of the development. The maximum parking rates for residential development are divided into 2 no. categories, which are as follows:

- **Zone 1:** *General rate applicable throughout the County.*
- **Zone 2 (Non Residential):** *More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).*
- **Zone 2 (Residential):** *More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service 5 (includes a train station, Luas station or bus stop with a high quality service)'.*

The maximum parking rates associated with new residential developments, as set out in Table 11.24 of the South Dublin County Development Plan 2016-2022 are as follows:

- 1 no. space per 1 bed apartment in Zone 1 and 0.75 spaces in Zone 2;
- 1.25 spaces per 2 bed apartment in Zone 1 and 1 space in Zone 2; and
- 1.5 spaces per 3 bed apartment in Zone 1 and 1.25 spaces in Zone 2.

The proposed development, on the basis of its proximity to the Red Cow Luas stop is situated in Zone 2, is therefore required to provide 0.75 spaces per studio and 1 bed apartment, 1 space per 2 bed apartments and 1.25 spaces for a 3 bed apartment. The following table provides a breakdown of parking spaces required for the proposed development scheme.

	No. of 1 Bed Apartments	No. of 2 Bed Apartments	No. of 3 Bed Apartments	Total No. of Spaces Required
Proposed Development	61	59	10	117

Table 7.0 Table showing the breakdown of car parking spaces required to serve the proposed development scheme

It is noted in Section 11.4.2 'Car Parking Standards' that the number of spaces set out above are not be exceeded, and in some instances a lower rate of parking may acceptable subject to the following:

- *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.*

Furthermore, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) outline that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria. The following guidance is provided in regards to Central and/or Accessible Urban Locations:

In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.

These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.



Figure 68.0 Map showing 500 metre and 1 kilometre distances from subject site (red star) to Clondalkin Village (blue star) and Red Cow Luas stop (purple).

A distance of 500 metres typically can be walked in 5 minutes and 1 kilometre in 10 minutes. The location of the subject site to the Red Cow Luas stop is walkable in 10 minutes making the site a location where carparking provisions are permitted to be lower than may typically be required of such a development. This is due to the accessibility of public transport options, promoting more sustainable transport, mitigating traffic problems and reducing greenhouse gas emissions.

The proposed development includes a total of 78 no. car parking spaces (62 no. at basement level and 16 no. at surface level (3 no. of which are designated disabled car parking spaces) which falls short of the maximum parking rates set out in the South Dublin County Development Plan 2016-2022.

While the subject site is c. 800 metres from the Red Cow Luas Stop making it walkable in 10 minutes, Dublin Bus Route Nos. 51X, 13, 68 and 69 travel along Monastery Road and Woodford Hill at the northern boundary of the site providing further public transport options. The subject development features 340 no. bicycle spaces for residents between basement and ground floor levels

Further to the above, the proposed car parking rate of 0.6 spaces per dwelling is considered appropriate due to the site's proximity to public transport. We note the guidelines as set out by the Development Plan does not dictate parking minimums.

6.14.7 Clondalkin Economic Development

Clondalkin is identified as being a Metropolitan Consolidation Zone in the South Dublin Country Development Plan (2016-2022) meaning that:

'Strong active urban places within the Metropolitan Area with strong transport links. These towns should be developed at a relatively large scale as part of the consolidation of the Metropolitan Area and to ensure that they support key public transport corridors connecting them to the City,

to each other and to Large Growth Towns in the Hinterland. Long term growth could see them expanding to a population of up to 100,000 people in a planned and phased manner'

Being a town with historic value, Clondalkin has been identified as having the potential to expand and develop its economy and tourism industry in the South Dublin County Development Plan 2016-2022.

Policy ET6: It is the policy of the Council to support and facilitate the development of an integrated network of Greenways and Trails (combined off road cycle and walking routes) along suitable corridors, including natural linear open spaces such as river banks and canals, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.

*ET6 Objective 2: To support the development of local tourist and heritage trails at suitable locations such as Brittas, **Clondalkin**, Lucan, Newcastle-Lyons, Rathcoole, Rathfarnham, Saggart, and Tallaght and seek to make such trails interactive e.g. development of application software.*

The future connectivity, economic development and expansion of Clondalkin can provide jobs for the County and Town's projected population growth. Future residential developments proposed at this site made possible by the change of use from office to residential can supply a working population to enable the town's economic growth.

7.0 Utilities

There is Eir Gas Networks Ireland and ESB Infrastructure within the vicinity of the development site. As part of the development, utility infrastructure will be provided to serve the subject site. Consultations at detailed design stage will need to be undertaken with the relevant utility providers.

8.0 Social and Affordable Housing

8.1 Part V, Section 96 of the Planning and Development Act

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to applications for development in excess of 9 no. dwellings and development of dwellings on land of more than 0.1 hectare.

New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1st September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

Circular Housing 33 of 2015 of 31 August 2015

Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.

Circular PL 10/2015 and Housing 36/2015 of 30 November 2015

Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.

Under Section 96(14)(b) of the Planning and Development Act 2000 (as amended) in relation to Part V 'Provisions of Social and Affordable Housing etc.' it is considered that the following section applies to the Blocks A, B and C as included within the proposed development:

(14) This section shall not apply to applications for-

(a) development consisting of the provision of houses by a body standing approved for the purposes of section 6 of the Housing (Miscellaneous Provisions) Act, 1992 , for the

provision of housing for persons referred to in section 9 (2) of the Housing Act, 1988 , where such houses are to be made available for letting only

*(b) The conversion of an existing building or the reconstruction of a building to create one or more dwellings, provided that **50 per cent or more of the existing external fabric of the building is retained.***

(c) the carrying out of works to an existing house.

As indicated from the outset of this report, the proposed change of use, refurbishment and modifications to the existing Blocks A, B and C will result in the revival of an existing underutilised site to provide additional accommodation, which will positively contribute to the local area. The proposed development retains a significant proportion (a minimum of 50%) of the existing building fabric of Blocks A, B and C, incorporating contemporary materials to external facades and modifying the internal configurations of blocks to provide for high-quality residential units, however the majority of the existing structures will be retained. Given that a minimum of 50% of the existing building fabric of Blocks A, B and C is proposed to be retained, the provisions of Part V are therefore not applicable to these blocks, pursuant to Section 96(14)(b) of the Planning and Development Act 2000 (as amended).

Notwithstanding the above, it is noted that the proposed development also proposes the construction of a new residential block, Block D as part of the subject development, which will comprise a total of 29 no. apartment units (17 no. one-bedroom units and 12 no. two-bedroom units). As this is a new feature that will be incorporated into the proposed scheme and does not relate to the upgrade or conversion of an existing building, the proposed Block D would be required to comply with the Part V provisions, comprised within Section 96 of the Planning and Development Act 2000 (as amended). A Part V validation letter from South Dublin County Council accompanies this application.

8.2 South Dublin County Development Plan 2016-2022

The following policies included in the South Dublin County Development Plan 2016-2022 have specific regard to the provision of social and affordable housing:

Policy H1: *It is the policy of the Council to implement the Interim South Dublin County Council Housing Strategy 2016-2022 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two Year Development Plan review.*

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

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

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

H1 Objective 7: To meet the County's need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, leasing, Housing Assistance Payment (HAP) scheme, Rental Accommodation Schemes (RAS) and the utilisation of existing housing stock. This should include for the provision of one bedroom units for homeless housing need.

8.3 Part V Proposal

As highlighted in Section 8.1 above, Part V of the Planning and Development Act 2000 (as amended) **does not** apply to Blocks A, B and C, as the proposal relates to the conversion of these existing blocks from office to residential accommodation, with a minimum of 50% of the existing external fabric of each of the blocks being retained. We note the below provisions of Section 96(14)(b) of the Act 2000 (as amended) in this regard, which the proposed development accords with:

Under Section 96(14)(b) of the Planning and Development Act 2000 (as amended) in relation to Part V 'Provisions of Social and Affordable Housing etc.' it is considered that the following section applies to the Blocks A, B and C as included within the proposed development:

(14) This section shall not apply to applications for-

(a) development consisting of the provision of houses by a body standing approved for the purposes of section 6 of the Housing (Miscellaneous Provisions) Act, 1992, for the provision of housing for persons referred to in section 9 (2) of the Housing Act, 1988, where such houses are to be made available for letting only

*(b) The conversion of an existing building or the reconstruction of a building to create one or more dwellings, provided that **50 per cent or more of the existing external fabric of the building is retained.***

(c) the carrying out of works to an existing house.

However, Part V of the Act 2000 (as amended) does apply to the proposed new block, Block D. In this regard it the applicants propose to fulfil their Part V obligations by building and transferring 3 no. units within Block D to the ownership of the Planning Authority, or to the ownership of persons nominated by the authority. Please consult the Part V drawings, prepared by Ha Design Studio, for specific details on the units proposed for construction/transfer.

The applicant has engaged in discussions with the Housing Department of South Dublin County Council in respect to Part V and further confirms its willingness to enter into an agreement with South Dublin County Council in respect of Part V (Social and Affordable Housing) should a grant of permission be forthcoming at the subject site, in accordance with the relevant provisions of the Planning and Development Act 2000 (as amended). A Part V validation letter from South Dublin County Council accompanies this application.

8.4 Air Quality and Noise

Air Quality

It is submitted that as part of previous planning applications pertaining to the subject site and the subsequent First Party Appeals submitted to An Bord Pleanála, Reg. Ref. SD19A/0324 – (ABP Ref. PL06S. 306409) and Reg. Ref. SD19A/0327 - (ABP Ref. PL06S. 306399), that a Desktop Air Quality Assessment was included as part of the appeal documentation. The following commentary is noted from the Board's Inspector's Report, published as part of ABP Ref. PL06S.306399, in respect of the desktop-based study which was previously undertaken:

'The Air Quality Assessment Report notes that the key potential source of emissions to air that could impact on the standard of air quality for public health at the subject site is the adjoining SIAC BP site. The assessment notes that SIAC BP has a statutory obligation and duty of care under the Air Quality Regulations 2011 (S.I. No. 180 of 2011) to operate in a manner to prevent any emissions to air that are deleterious to the interests of the public health of the occupants of any adjoining properties, regardless of whether these are commercial or residential.'

'In preparing the Air Quality Assessment Report, Enviroguide Consulting reviewed a Planning and Environmental Statement which accompanied a recent application on the SIAC BP site

(SDCC Reg. Ref. 19A/0063). This review determined that emissions from the asphalt plant/emissions stack are routinely monitored on an ongoing basis in accordance with recognised best environmental practice, with all emissions being below recognised emission threshold values. It is also noted that a 5-year waste permit on the SIAC BP site contains conditions regarding the prevention of odour/dust/nuisances and the undertaking of dust monitoring. Based on the foregoing, it is submitted that there should be no emissions to air that would impact air quality for prospective residents of the proposed development.'

'While air quality monitoring was not undertaken on site, the assessment notes that baseline air quality for the closest monitoring stations at Tallaght and Ballyfermot indicate an Air Quality Index for Health (AQIH) of 1 and a status of "good air quality" at both locations. As such, it is submitted that the current baseline air quality in the vicinity of the subject site is good.'

'The results of ambient air quality monitoring for 2 no. 24-hour monitoring periods for PM10 and PM2.5 undertaken on the SIAC BP site in 2018 were also reviewed (Planning Reg. Ref. SD19A/0063 refers). The monitoring was undertaken at 2 no. locations, including at the south-eastern corner of the current application site, and at the shared entrance adjacent to the Woodford Hill/Monastery Road roundabout. The recorded results were noted to be less than 50% of the Irish Standards that are protective of human health, with the max. concentrations of PM10 and PM2.5 being within the range for an AQIH Air Quality Index of 1 and AQIH status of "good air quality". The monitoring results also noted that the 27m height of the SIAC stack was above the minimum 12m height required for adequate dispersion of emissions and that regardless of the proposed changes to the operations at the SIAC BP site, there would continue to be no impacts on air quality. Based on the foregoing, Enviroguide Consulting conclude that there will be no potential air quality issues for prospective residents of the proposed development.'

'In my opinion, the undertaking of air quality monitoring within the subject site would have been a preferable approach in support of this planning application. However, notwithstanding the foregoing, I consider that the desktop review of the available baseline information which has informed the Air Quality Assessment submitted with the appeal is a reasonable approach, having regard to the date of the air quality monitoring on the adjoining SIAC BP site and the results which were obtained.'

Having due regard to the above commentary provided by the Board's Inspector, it is noted that the applicant has engaged AWN Consulting to undertake an Air Quality Assessment, including air quality monitoring. A detailed baseline assessment for NO₂, SO₂, benzene, and PM₁₀/PM_{2.5} (particulate matter <10 µm and <2.5µm) was undertaken on the site of the proposed development to ensure the works undertaken at the adjoining site of SIAC BP Construction will not impact on the air quality of the potential residents. Monitoring was conducted for a two-month period, from June 2021 – August 2021.

The report confirms that the existing baseline levels of NO₂, SO₂, Benzene, PM₁₀, and PM_{2.5} are low and are within the applicable ambient air quality standards in the region of Dolcain House, Clondalkin. It can therefore be concluded that operations at the adjoining SIAC BP site are not currently causing a deleterious impact to the local ambient air quality and are unlikely to negatively impact the air quality for potential future residents. Please refer to the enclosed Air Quality Impact Assessment prepared by AWN Consultants for further details.

Noise

In addition to the above, it is noted that as part of previous planning applications pertaining to the subject site and the subsequent First Party Appeals submitted to An Bord Pleanála, Reg. Ref. SD19A/0324 – (ABP Ref. PL06S. 306409) and Reg. Ref. SD19A/0327 - (ABP Ref. PL06S. 306399), that an Acoustic Review of the impact of noise and vibration from SIZ Quarry and N7 Traffic at the proposed residential development site, as prepared by Dalton Acoustics Ltd., was included as part of the appeal documentation.

A Noise Assessment prepared by Dalton Acoustics is provided under a separate cover for the consideration of the Board.

9.0 Appropriate/Environmental Assessment

Article 299B of the Planning and Development Regulations 2001-2019, as amended, outlines requirements in relation to environmental impact assessment for subthreshold development where no screening determination was made under section 7 of Act. Article 299B(1)(b)(ii)(II) and Article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended, read as follows:

(b) (i) The Board shall carry out a preliminary examination of, at the least, the nature, size or location of the development.

.....

(ii) Where the Board concludes, based on such preliminary examination, that—

.....

(II) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall satisfy itself that the applicant has provided to the Board

(A) the information specified in Schedule 7A,

(B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and

(C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

(c) The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.

Schedule 7A referred to in Article 299B(1)(b)(ii)(II)(A) reads as follows:

1. *A description of the proposed development, including in particular—*
 - (a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and*
 - (b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.*
2. *A description of the aspects of the environment likely to be significantly affected by the proposed development.*
3. *A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from—*
 - (a) the expected residues and emissions and the production of waste, where relevant, and*
 - (b) the use of natural resources, in particular soil, land, water and biodiversity.*
4. *The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.*

To assist with the Board determination, we provide the following information:

9.1 Appropriate Assessment

The EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as “the Habitats Directive”, was adopted in 1992, came into force in 1994 and was transposed into Irish law in 1997. The main aim of the Habitats Directive is to contribute towards the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory.

A Screening Report for Appropriate Assessment, prepared by Altermar Environmental Consultants, has been prepared as part of this application which looks at the potential effects of the proposed project on Natura 2000 sites. It accompanies this planning application under a separate cover.

It is noted that screening for Appropriate Assessment has been undertaken for the proposed development in accordance with the Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009). In summary, the Screening Report for Appropriate Assessment concluded that “No Natura 2000 sites are within the zone of influence of this development. Having taken into consideration the effluent discharge from the proposed development works, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the dilution effect with other effluent and surface runoff, it is concluded that this development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites”.

9.2 EIAR Screening Report and Regulation 299B Statement

The application engaged AWN to prepare an Environmental Impact Assessment Screening report as part of this application which is enclosed under separate cover.

The purpose of this report to provide the planning authority with the information required under Schedule 7A to demonstrate the likely effects on the environment, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended. This information will enable the planning authority/An Bord Pleanála to undertake a screening determination in respect of the need for an Environmental Impact Assessment Report (EIAR) for the proposed development. This report also summarises and documents the studies undertaken by the Applicant, and the design team, which demonstrate there are no significant effects predicted as a result of the proposed development and the application can be determined by planning authority without an EIAR having been submitted.

The proposed development and component parts have been considered, as documented in Section 2, against the thresholds for EIA as outlined in of the Planning and Development Regulations 2001 (as amended). The proposed development is a sub-threshold development and is not mandatory for EIA. AWN Consulting, the design team, and specialist subconsultants have undertaken an assessment on the likelihood of significant effects on the environment from the proposed development. The assessment is documented in Section 3.0, 4.0. and 5.0 and covers each aspect of the environment in accordance with guidance including; Population and Human Health; Biodiversity; Land, Soils, Geology, Hydrogeology, and Hydrology; Air Quality and Climate; Noise and Vibration; Landscape and Visual Impact; Cultural Heritage, and Archaeology; Traffic and Transportation; Material Assets, and Waste.

AWN has concluded, there are no likely significant environmental effects on the receiving environment for the proposed development, which would warrant preparation of an EIA.

In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment.

AWN were also engaged by the Applicant to prepare a Regulation 299B Statement in accordance with the provisions of Regulation 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001 (as amended; hereafter referred to as the “Planning Regulations”), this document provides a ‘statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account’. This statement is part of the information provided by the Applicant so that the Board may complete an examination for the purposes of a screening determination in accordance with Articles 229B and 229C of the Planning Regulations.

10.0 Conclusion

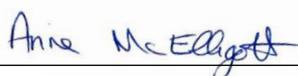
In conclusion, we submit that the proposal which comprises the change of use of the existing office blocks on site to residential and the construction of an additional residential block, featuring 130 no apartments, at Dolcain House, Monastery Road, Clondalkin, Dublin 22, is considered to be acceptable and compliant with the policies and objectives as set out in the applicable national, regional and local planning policy context.

At a national and regional level, this statement has demonstrated consistency with the following:

- Project Ireland 2040 – National Planning Framework (2018);
 - National Development Plan 2018-2027;
 - Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018;
 - Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016;
 - Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007);
 - Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009);
 - Urban Design Manual – A Best Practice Guide 2009;
 - Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020);
 - Design Manual for Urban Roads and Streets (2013);
 - The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland, 2009
 - Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly, 2019.
- And

Consistency is also demonstrated with the policies and provisions of the South Dublin County Development Plan 2016-2022 which is a key planning policy document at a local and regional level.

It is considered that the proposed residential development, featuring 130 no. apartments, at this application site in the Clondalkin Area presents an appropriately scaled residential development on residentially zoned land. It is considered that the subject site, being located within close proximity to public transport links, and Metropolitan Consolidation Towns Clondalkin and Tallaght, has the capacity to accommodate additional residential accommodation in response to the current housing shortage. The development has been designed to an exceptionally high standard to contribute to the urban form of the area and it is considered that the proposal will not give rise to any undue impacts on the amenity of any adjacent properties. We are of the opinion that the development is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plans and other national guidance documents.



Anne McElligott MIPI
Associate Director
for HPDC.