

Planning Report

Amendment Application for Block D4

At Cooldown Commons Phase 3,

Fortunestown Lane,

Citywest,

Dublin 24

April 2022

PREPARED BY



ON BEHALF OF

Cairn Homes Properties Ltd.

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Introduction

On behalf of the applicant, Cairn Homes Properties Ltd., this planning report accompanies an amendment application to South Dublin County Council under Section 34 of the Planning and Development (Housing) and Residential Tenancies Act (2016) for an amendment to block D4 of permitted Strategic Housing Development at Cooldown Commons Phase 3, Fortunestown Lane, City West, Dublin 24 in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016.

The application has been prepared by a multidisciplinary team on behalf of Cairn Homes Properties Ltd as set out in the table below.

Company Name	Documents Prepared
McGill Planning	Planning Report including
Reddy Architecture	Design Statement
	Housing Quality Assessment
	Architectural Drawings
DBFL	Infrastructure Design Report
Avison Young	Daylight and Sunlight Assessment
O'Dwyer and Jones	Aeronautical Assessment
Modelworks	Photomontages and CGI's

Table 1 Design Team and Documents Prepared

The Proposed Development

Statutory Notices

The proposed development is described in the statutory notices as follows:

Cairn Homes Properties Ltd intend to apply for Permission for development at this site at Cooldown Commons and Fortunestown, Citywest, Dublin 24.

The development will consist of an amendment to Block D4 of the Strategic Housing Development permitted under ABP-310570-21 at Cooldown Commons and Fortunestown, Citywest, Dublin 24 (on lands located north of the Luas red line and Fortunestown Luas stop).

The proposed amendment to Block D4 is for a reduction in height to 9 storeys (from 13 storeys) and associated reduction in the number of units to 44 (from 60 no. units). Block D4 will have 4 no. 1 beds (no change), 34 no. 2 beds (down from 46 no.) and 6 no. 3 beds (down from 10 no.) all with associated private balconies/terraces to the north/south/east/west elevations. This will result in the reduction in the total number of residential units across the entire development site from 421 no. residential units to 405 no. residential units. Block D4 will also provide 564sqm residential amenity space at ground floor level (an increase of 9sqm). Minor amendments to the southern elevation are also proposed. The application includes for all site services required to facilitate the amendment to Block D4.

Summary of the Development

The site is located in Cooldown Commons, Fortunestown, Citywest and extends to a size of 0.1076ha. It is part of a wider development that was granted permission for 421 no. residential units (ABP Reg Ref 310570), along with residential amenities, public open spaces and retail and office facilities. The construction of this permission is currently underway. This proposal is an amendment of Block D4 of this development to reduce the height of the building and reduce the overall number of units. Block D4 is located centrally within the permitted SHD development. The proposed development statistics are set out in the table below:

Development Proposal	Proposed D4 Amendment	Full site as permitted
No. of Units	405 - 126 no. 1 bed units (31%) - 255 no. 2 bed units (63%) - 24 no. 3 bed units (6%)	421 - 126 no. 1 bed units (30%) - 267 no. 2 bed units (63%) - 28 no. 3 bed units (7%)
Facilities	Increase in internal residential amenity by 9sqm to 564sqm	Residential amenity of 555sqm
Density	119 units/ha	124 units/ha
Plot Ratio and site coverage	No change	No change
Building Height	1-9 storeys	1 – 13 storeys
Aspect	58% dual aspect (including duplexes) 53% dual aspect (excluding duplexes)	59% dual aspect (including duplexes) 55% dual aspect (excluding duplexes)
Public and communal Open Space	No change	No change
Car Parking	No change	No change
Cycle Parking	No change	No change

Table 2 Summary of Site Statistics

	D4 as Proposed	D4 as Permitted
No. of units	44 - 4 no. 1 bed units (9%) - 34 no. 2 bed units (77%) - 6 no. 3 bed units (14%)	60 - 4 no. 1 bed units (7%) - 46 no. 2 bed units (77%) - 10 no. 3 bed units (16%)
Building Height	9 storeys	13 storeys
Aspect	73% dual aspect	80% dual aspect
Gross Area	4814 sqm	6702 sqm
Net Area	3645.8 sqm	5078.2 sqm
Residential Amenity	564 sqm	555 sqm

Table 3 Summary of Block D4 permitted and proposed

Site Location and Context



Figure 1 Approximate site location (red) within SHD site (yellow)

Block D4 is located to the southern end of the permitted development site, immediately to the north of the permitted plaza and the existing redline luas stop, Fortunestown Lane. It is located along the central spine route into the site. The subject application site is c. 0.1076 sqm and is rectangular in shape, running in a predominantly north-south direction.

The overall permitted SHD site, of which it is part, is located immediately north of the Fortunestown Lane Luas stop and the Luas line bounds the site to the south and east. The adjacent lands to the north, north-east and west of the site are currently under construction or have planning permission. The small triangular site to the southeast of the site is currently undeveloped. The Citywest Shopping Centre is located south of the subject site, on the opposite side of Fortunestown Lane and the Luas tracks and benefits from a recent grant of permission for additional development.

The wider SHD site area is irregularly shaped and extends to c. 3.404ha. The delivery of the permitted development has commenced on site. Blocks E1 and E2 are completed up to the first floor. All of the site roads have been completed to base course with drainage lines completed below. All the attenuation tank and wider site services have been installed. The basement dig has been completed with piled foundations below basement nearing completion. The site compound is currently located in the east corner of the site in the location of the open space.

The site is free from any protected structures or monuments and it is not located within a Conservation Area or an Architectural Conservation Area. The site is not within a Special Area of Conservation (SAC) or Special Protection Area (SPA).

The surrounding area has seen significant development in recent years with the extension of the Luas red line and the construction of new residential developments. The area is well served by existing social and employment infrastructure with numerous industrial and business parks, public transport, schools (primary and post-primary), retail units (existing and permitted), and parks all within 1km of the subject site.

Planning History

As noted above the area around the site is changing from greenfield area to an area under the guidance of the Local Area Plan and the Development Plan for the area. There are currently several permissions on the site and within the wider area, granted by both South Dublin County Council and also An Bord Pleanála. The table below sets out the details of the permissions granted in the area to date.

Application number	Description
ABP- 310570	Permission was granted for the amendments to previously permitted SHD permission ABP-302398 for the replacement of 32 no. duplex apartments with the construction of 421 no. apartments
ABP-302398	Permission was granted for 459 units plus a creche, the majority of this development has been completed.
SD15A/0095 (SD14A/0121)	Permission was granted for 224 residential units. These have now been completed
SD16A/0210	Permission was granted for 111 no. dwellings
SD15A/0127	Permission was granted for 399 no. residential units, a creche, kiosk and retail unit.
ABP 305556	Permission was granted for 290 no. apartments and a creche, 4 retail units and 2 no. café/ restaurants
ABP300555 (SD18A/0420)	Permission was granted for 524 no. residential units and a creche and community room
ABP 305563	Permission was granted for 488 no. residential units, 6 retail units (total 1,180 sqm), a café unit (188 sqm) and a creche (431 sqm).
ABP 306602	permission was granted for 463 no. residential units and a creche
SD18A/0014	Permission was granted for 78 no. residential units comprising houses and apartments
SD18A/0015	permission was granted for 52 no. houses

Table 4 Permitted development within the area

Subject Site

Cairn Homes Properties Ltd was granted permission for an amendment SHD application on the SHD subject site for the replacement of 32 no. duplex apartments with the construction of 421 no. residential units, 3no. retail units, an office unit and a residential amenity area on the 18th June 2021 (Reg. Ref ABP-310570-21). The application was granted permission on the 7th of October 2021.

The current proposal seeks to amend the SHD permission (ABP-310570-21) (under construction), reducing the storey height of block D4 from the permitted 13 storeys to 9 storeys.

The Board granted permission for Ref ABP-310570-21 with 29 conditions attached. Condition 11(a) states 278 no. car parking spaces are solely for the purpose of residential use. This is below the standards set out in the SDCC development plan but given its proximity to the Luas line was considered acceptable.

The Board deemed the proposed development an acceptable density in the urban location and would not injure residential or visual amenity. The proposed development was deemed acceptable in terms of design and building height and therefore, acceptable for pedestrian, traffic and aviation safety. The Board also considered the proposed development of strategic and national importance by reason of contributing to the delivery of housing and greater density and building heights of residential developments in line with Government policy. Overall, the Board considered that the proposed development *"is consistent with the pattern of development, existing and permitted, which has become established in the Citywest area in terms of building heights, residential densities and residential unit mixes, sizes and typologies."*

Rationale for Development

The subject site is zoned for residential use within the South Dublin County Development Plan (Development Plan) and the Fortunestown Local Area Plan (LAP).

The proposed development seeks to amend Block D4 of the permitted SHD scheme on the site by reducing the permitted block from 13 storeys to 9 storeys. This will result in the loss of 16 no. units with the amended Block D4 providing a total of 44 no. units.

The proposal includes minor changes to the residential amenity space at the ground floor of Block D4, increasing it by 9sqm. It will also amend the windows on the southern elevation to provide a more windows facing onto the plaza, providing more light into these apartments and also providing a more attractive elevation onto the plaza.

The proposed amendment will not alter the permitted layout, open spaces (public, communal or private), the drainage infrastructure, or car/cycle parking. It will also not alter the permitted blocks D1, D2, D3, E1, E2, F1, F2 or G and will therefore not alter the permitted retail/commercial/ office units.

It is worth noting that the permitted development is currently under construction on site.

Height

The amended Block D4 will range in height from 6 to 9 storeys. This is a reduced height compared to the permitted 6 to 13 storeys and will therefore have a reduced visual impact on the surrounding area.

It is noted that the 2012 Fortunestown Local Area Plan sets a maximum building height of 20m. However, the LAP precedes the 2018 Building Height Guidelines, the Apartment Guidelines 2018 and the NPF and is not in compliance with these documents. The 2018 Building Height Guidelines state that *it is Government policy that building heights must be generally increased in appropriate urban locations*. The Guidelines also note that blanket limitations on building heights can hinder innovation in urban design and architecture leading to poor planning outcomes.

In addition, we note the majority of the permitted blocks are at least 6 storeys in height stepping up in height to 7, 8 and 9 stores. Blocks E1, E2, and D3 permitted under ABP- 310570 also exceed the LAP building heights with height of 6-9 storeys to the east and west of Block D4. These blocks are currently under construction on site and will provide a strong frontage to the Luas track and open spaces once complete. The amended height of Block D4 will integrate into the emerging characteristics of the area and will help to create a strong sense of place at the plaza between Blocks D3 and E1. This is full in line with the criteria set out in section 3.2 of the Building Height Guidelines and SPPR3. The proposed height will be of a scale that is appropriate to the emerging scale within the neighbourhood in terms of both the neighbourhood and the recently permitted sites and those under construction as well as the site itself which has recently been permitted.

It is noted that the ABP Inspector acknowledged the restrictions of the Fortunestown LAP in terms of building height, however it found that with regard to the Building Height Guidelines and referred to in SPPR3 that *"the proposed development satisfies these development management criteria and thereby SPPR 3 of the Building Height Guidelines."*

The Inspectors report goes onto highlight that *"With regard to the design and building height approach employed by the applicant, I consider this to be reasonable and a sound basis for achieving good architectural and urban design. The approach has employed the use of an architectural language for the landmark building (Block D4) and the remaining buildings within the scheme (design, proportions, materials, elevational elements) that I consider to be consistent and complimentary to each other whilst featuring sufficient differences in orientation, building footprint, scale and height to provide variety, visual interest and a high degree of distinctiveness."* Whilst this proposal reduces the height of block D4 its maintains its architectural distinction as one of the taller buildings on the site at 9 storeys while it is further distinguished by the materials proposed.

The inspector also notes that *"the pattern of development to be a material planning consideration in the assessment of building height. ... As is evident, in recent years several developments have been permitted with similar building heights to that currently proposed, that being, the majority of blocks in the proposed development are between 6-9 storeys in height. I consider the proposed development to be consistent with the newly emerging pattern of development, both permitted and currently being implemented, which is consistent with national policy and guidelines."* In line with this approach, this proposed amendment for a reduction to 9 storeys is in line with the pattern of development in the surrounding areas.

Aviation

The subject site is located c. 2km south-east of the Baldonnell Casement Aerodrome and c. 3km west of the Tallaght Hospital. The proposed reduction in height of block D4 will reduce the potential to impact these as the height will be reduced from 13 storeys which is permitted to 9 storeys. This is confirmed by the updated Aeronautical Assessment included with this application. This assessment noted the following

- Block D4 will still be above the Casement Aerodrome's Inner Horizontal Surface (HIS) by 12 meters but this relatively small projection is not significant and would not cause any adverse aviation effect.
- The reduced height will result in an increased "shielding" effect from Saggart Church.
- Due to the presence of other items of similar height including another recently permitted apartment building, the reduced Block D4 can have no additional adverse effect on aviation.

The Aeronautical Assessment also noted that in the event that the Solar PV panels produce reflections which affect aviation the panels will be adjusted to the Air Corps' satisfaction.

Density

The permitted SHD scheme provides 421 no. residential units on a site area of 3.404ha resulting in a site area of 124 units/ha. The proposed amendment will reduce the number of units by 16 no. to 405 and reduce the density of the overall parent permission site to 119 units/ha which is still considered an appropriate density for this highly accessible site and in line with the permitted SHD.

Aspect

The permitted Block D4 included 60 no. units of which 48 no. were dual aspect (80%). The amended Block D4 will include 44 no. units of which 32 are dual aspect (73%). None of the single aspect units are north facing. This is in excess of 50% required under the Apartment Guidelines for a Central/ Accessible site such as this.

Daylight and Sunlight

Avison Young have examined the proposed amendment and have found that "due to the isolated reduction in height there will likely be a minor improvement to the daylight/ sunlight performance of proposed blocks within the original site that look onto block D4, and also a minor improvement in relation to overshadowing of proposed amenity areas located around D4.

Overall, it is our professional opinion from a desktop review of the amendment application drawings that due to the isolated reduction in massing to block D4 there will be no material alteration to the daylight, sunlight and overshadowing results previously outlined in the Report."

Parking

The proposed amendment will not alter any of the car or cycle parking permitted under ABP- 310570 which included a total of 289 no. car parking spaces at basement and surface level.

Condition 11(a) of the grant of permission stated:

The car parking facilities hereby permitted shall be reserved solely to serve the proposed development. 278 clearly identified car parking spaces shall be assigned permanently for the residential development

and shall be reserved solely for that purpose. These residential spaces shall not be utilised for any other purpose, including for use in association with any other uses of the development hereby permitted, unless the subject of a separate grant of planning permission.

This requirement for 278 no. residential car parking spaces resulted in a car parking ratio of 0.66 no. car parking spaces per unit. The allocation of car parking associated with D4 will be allocated proportionately in line with this condition.

Condition 11b requires that *“Prior to occupation of the development, a Parking Management Plan shall be prepared for the development and shall be submitted to and agreed in writing with the planning authority. This plan shall provide for the permanent retention of the designated residential parking spaces and shall indicate how these and other spaces within the development shall be assigned, segregated by use and how the car park shall be continually managed.”* Once the development is completed, and prior to occupation in line with this condition, a parking management plan will be submitted to SDCC in line with this condition, and condition 11a.

If considered appropriate a similarly worded condition can be attached to this planning amendment application to ensure that the appropriate management and residential car parking ratio is achieved on this amended application.

Unit Mix

The amendment to Block D4 will slightly alter the unit mix of Block D4 and the overall unit mix of the permitted development. The table below shows the permitted and amended unit mix for both the overall development and Block D4.

	Permitted SHD		Amended SHD	
Unit Size	No. Of Units	Percentage	No. Of Units	Percentage
1 Bed	126	30%	126	31%
2 Bed	267	63%	255	63%
3 Bed	28	7%	24	6%
Total	421	100%	405	100%
	Permitted D4		Amended D4	
Unit Size	No. Of Units	Percentage	No. Of Units	Percentage
1 Bed	4	7%	4	9%
2 Bed	46	77%	34	77%
3 Bed	10	17%	6	14%
Total	60	100%	44	100%

Table 5 Permitted vs Proposed Unit Mix

The altered mix is similar to that permitted with the only change being the slight alteration in the proportion of 3 beds to 1 beds throughout the development. However, this mix is in line with the Apartment Guidelines. It is noted that the Inspector found when granting the parent permission that *“In respect of the residential unit mix, size, and typology, I consider the proposed development instead satisfies the mix of units stipulated in SPPR 1 of the Apartment Guidelines, and the size and typology of units stipulated in SPPR 3 of the Apartment Guidelines and SPPR 4 of the Building Height Guidelines”*

Visual Impact Assessment

The proposed amendment will reduce the height and visual impact of Block D4 which is demonstrated in the photomontages submitted with this application. The permitted material of Block D4 and the proposed amendment to the windows on the southern façade will ensure that Block D4 maintains its purpose as providing a visual focal point in the area.

Modelworks have prepared an LVIA statement for the Environmental Report which states that *the proposed reduction in height of BlockD4 would not change the conclusions of the landscape/townscape impact assessment and that the adjusted development would have all of the positive effects identified.*

Compliance with Part V

10% of the proposed development will be Part V in line with national policy. The proposed units along with the costings have been sent to South Dublin County Council and are also enclosed with this application submission.

Ecological Assessments

An Environmental Impact Assessment Report was completed for the permitted SHD report. An Environmental Report, with input from all the EIAR consultants was prepared for this amendment and is submitted with this application.

Response to consultation with South Dublin County Council

Prior to the submission of this amendment application consultation was carried out with South Dublin County Council. The Planning Authority facilitated an internal review and provided comments to the agents via a Teams call on 11th March 2022. The comments were as follows:

Car Parking

- Car parking management plan for surface and basement level parking would be required in line with condition 11 of the grant of permission
- That the ratio of cycle parking should increase

Applicants' response

As set out above and in the DBFL report, the residential parking will be allocated proportionate to the ratio required by condition 11a.

There is no proposed reduction in the amount of cycle parking as a result of the development. The reduced number of residential units will result in an increase in the ratio of cycle parking from 1.6 to 1.5 cycle parking over all.

SuDS and Flood Risk

- Will it remain the same, all SuDS should be attenuated as much as possible.
- SODA and PCE should be submitted
- Identify there is no flood risk

Applicants' response

As set out in the DBFL report all SuDS will remain the same, much of which has already been installed across the site. The DBFL report also confirms there is no flood risk assessment.

The SODA and PCE from the previous application are included in Appendix B and C of the application form.

Part V

- Updated Part V needs to be submitted

Applicants' response

An updated Part V proposal has been submitted to SDCC and are enclosed with this application.

Height

- Photomontages are required.
- Heights are higher than the LAP but it is noted the ABP decision for a 13 storey building is more recent along with the Building Height Guidelines so the 9 storey building needs to be justified in this context.

Applicants' response

This is noted and has been justified in line with this above.

Statement of Consistency Planning Policy Review

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

National Policy

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

1. Urban Development and Building Heights - Guidelines for Planning Authorities (2018);
2. Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)

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



The Apartment Guidelines 2020 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

The guidelines note that apartments are most appropriately located within urban areas and that the scale and extent of apartment development should increase in relation to proximity to core urban centres and other factors. The guidelines outline three types of locations:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided within the guidelines.

The proposed apartment units have been designed in accordance with the *Sustainable Urban Housing: Design Standards for New Apartments (2020)*. These guidelines include Specific Planning Policy Requirements (SPPRs) to guide apartment development. Section 1.20 of the guidelines note that the SPPRs

'take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements'.

It is our contention that the proposed site of this amendment application, comes under the definition of a "Central and/or Accessible Urban Location" which the Guidelines state *"are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments..."*

The site of the proposed amendment represents an Accessible Urban Location for the following reasons:

<p><i>Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions</i></p>	<p>The proposed amendment is located close to a number of employment centres, the closest and largest being the Citywest Business Campus located directly north (within 300m) of the proposed development. Citywest is one of the largest employment centres in the Dublin Area outside of the city centre and according to its website (www.citywestcampus.com) contains over 180 businesses.</p>
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<p><i>Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas)</i></p>	<p>The site is located in close proximity, north of Fortunestown luas stop with high frequency services to Dublin City Centre and to Tallaght.</p>
<p><i>Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.</i></p>	<p>Citywest Shopping Centre Bus Stop (No. 7460) is located 300m to the southeast and is currently served by Dublin Bus Services Nos 77a and 65b which provide regular services to/from Dublin City Centre. The No. 175 service between Citywest and UCD also runs along Citywest Avenue to the east of the site. Citywest Shopping Centre is also proposed as a new bus interchange under the BusConnects proposals. Under the proposals, the existing Dublin bus routes will be replaced by a new route W8 between Citywest and Tallaght which is also proposed to provide a direct service to Maynooth and Celbridge. Improved service frequencies are also proposed to destinations to the east via a number of new routes. The existing 77x bus route will be replaced by a new orbital route (S6/S7) which will provide direct frequent services between Tallaght and UCD.</p>

The guidelines outline 9 Special Planning Policy Requirements (SPPRs) that take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

Guidance	Evaluation of Consistency
<p>SPPR1 notes that apartments may include up to 50% one bedroom or studio type units and that there shall be no minimum requirement for 3 or more bed units.</p>	<p>The proposed amendment to the parent permission will subsequently provide 405 no. units as follows:</p> <ul style="list-style-type: none"> - 31% one beds - 63% two beds - 6% three beds <p>This is in accordance with SPPR1.</p>
<p>SPPR2 relates to building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha.</p>	<p>N/A</p>
<p>SPPR3 sets out the minimum floor areas for apartment units along with a requirement that the majority of units within a scheme shall exceed the minimum floor areas by 10%</p>	<p>The Housing Quality Assessment prepared by Reddy Architecture + Urbanism illustrates in tabular format how each apartment meets or exceed the relevant standards in respect to apartment size.</p>
<p>SPPR4 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p>	<p>As a result of the proposed amendment to the parent permission the overall dual aspect of units are as follows:</p> <ul style="list-style-type: none"> - 58% dual aspect (including duplexes) - 53% dual aspect (excluding duplexes)

<p>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.</p> <p>(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.</p>	<p>The blocks have been carefully designed to ensure that none of the single aspect units are north facing. The majority of single aspect apartments are south/ east or west -facing.</p>
<p>SPPR5 requires all ground floor apartments to have 2.7m floor to ceiling heights.</p>	<p>All the ground floor apartments achieve the minimum requirement of 2.7m floor to ceiling heights in line with SPPR5.</p>
<p>SPPR6 limits the number of units per core to 12 units.</p>	<p>The proposal is in line with SPPR6 regarding the number of units per core.</p>
<p>SPPR7 and 8 relate to BTR Developments.</p>	<p>N/A</p>
<p>SPPR 9 states that there shall be a presumption against granting planning permission for shared accommodation/co-living development.</p>	<p>N/A</p>
<p>The apartment guidelines states that all apartments should include private and communal open space.</p>	<p>All apartments will have private open space in balconies or terraces. These private open spaces have been designed in accordance with all best practice guidelines.</p>
<p>Section 4.16 identifies that cycling <i>“provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.”</i></p>	<p>The proposed amendment will not change the provision of bicycle spaces. Therefore the ratio of parking for residents will increase as a result in the reduction in numbers.</p>
<p>Section 4.19 notes that for central and/or accessible urban locations comprising wholly of apartments in more central locations well served by public transport, the default policy is for car parking provision to be minimised.</p>	<p>Condition 11(a) of the parent permission identifies 278 no car parking spaces are solely for residential use. This is below the standards set out by SDCC, however, given its excellent links to public transport this is considered appropriate. The amendment application will ensure that a similar ratio is maintained</p>
<p>Appropriate density</p>	<p>The proposed density on the site is 119 units/ha. This is a reduction on the permitted development. This an appropriate density considering the site’s proximity to the Fortunestown Luas stop, the excellent bus routes, the Citywest Shopping Centre, and the numerous business parks.</p>

Evaluation of Consistency

The application is an amendment to reduce the height and unit numbers for the development, however it will ensure that the density, unit mix and scale is appropriate to this central and accessible area. The subject site is within walking distance of the three business parks which are significant employment locations in the area, and it is next to the Fortunestown Luas station, and frequent bus routes (with planned significant expansion) and to Citywest Shopping Centre. It is therefore considered an Accessible Urban Location that is suitable for higher density development.

Guidelines for Planning Authorities on Urban Development and Building Heights 2018



The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plan and strategic development zone planning schemes.

The Guidelines emphasise the policies of the NPF to **increase levels of residential development in urban centres and increase building heights and overall density** by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála.

The Guidelines place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. *“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors”.*

It goes on to highlight that *“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.* It encourages local authorities away from setting generic maximum height limits across their functional areas identifying *“such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes.”*

The Guidelines sets out Development Management Criteria and Specific Planning Policy Requirements (SPPRs) to assist planning authorities in assessing planning applications for increased building heights.

Evaluation of Consistency

The subject site is well served by public transport, with the Fortunestown Luas stop to the south of the site, and there are a variety of employment areas and social infrastructure within 1km of the subject site. The subject site is considered an appropriate location for building heights of up to 9 storeys.

The permitted heights in the SHD scheme along with the proposed amended height of Block D4 will provide a positive impact on the area by creating a strong sense of place and legibility for the area once complete. The reduced height of Block D4 will complement the permitted heights within the wider SHD site area, which are currently under construction and provide a range of heights generally from 6 to 9 storeys albeit with some 3 storey buildings within the permitted development.

Block D4 is located outside of the noise and security Zones for Casement Aerodrome Baldonnell and is also located outside similar zones for Dublin Airport. The subject site lies under the Casement's Inner Horizontal Surface and extends slightly above this surface. The Aeronautical Assessment submitted with this application notes that the amended height complies with all aviation and aeronautical requirements affecting its location at Fortunestown

The proposal is considered in accordance with the development management criteria and the SPPRs set out in the Guidelines.

We note the following compliances with the Development Management Criteria in the Guidelines:

Development Management Criteria	
At the scale of the town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is located immediately north of the Fortunestown Luas stop which provides a high frequency public transport link to Dublin city centre. In addition, 6 no. different bus routes serve the site with buses arriving at the stop every 10 – 15 minutes and providing access into Dublin City Centre, UCD and Citywest.
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.	<p>The site is not located within an ACA nor are there any protected structure on site and in the vicinity. There are no protected views across the site or in the vicinity.</p> <p>The proposal due to the materials and amended height will ensure that an attractive public plaza is created beside this pedestrian dominated area next to the Fortunestown Luas stop. It will provide a mixture of uses in this location including retail and café.</p> <p>The surrounding area has seen significant development in recent years. The proposed development will integrate with the two adjacent sites that are currently under construction as well as the parent permitted scheme which</p>

<p>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.</p>	<p>is currently underway. The routes through this site will remain unchanged as a result of this proposal and will continue to connect with the routes in the adjoining sites.</p> <p>The provision of the buildings up to 9 storeys along with the proposed materials of block D4 next to the Luas ensures that wayfinding to the Luas stop will be improved. The heights of the other buildings on the site have also been carefully located to integrate with the buildings under construction.</p> <p>The proposal is fully detailed in terms of landscaping, roads, infrastructure and engineering which will remain the same as in the permitted development. This amendment application will not alter this in any way.</p>
<p>At the scale of the neighbourhood</p>	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</p>	<p>The surrounding area has seen significant development in recent years and many of the lands adjacent to the subject site are currently under construction. Indeed, Block D4 basement has been completed. The reduced height has been carefully designed to integrate with these new developments and the permitted development. It is of a height which fits within the range of heights within the surrounding area. This integration will ensure that a high-quality environment is created and is a positive contribution to the neighbourhood.</p>
<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>Block D4 has been designed to provide visual interest. The southern façade has been amended to provide additional windows overlooking the plaza. While the stepping of the height to the east and use of materials provides visual interest.</p>
<p>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).</p>	<p>Block D4 will continue to frame the permitted new public space. The amenity at ground floor level will provide activity fronting onto this space.</p> <p>The site is not at risk of flooding (as per the Site Specific Floodrisk Assessment submitted with the parent permission).</p>
<p>Makes a positive contribution to the improvement of legibility through the site or wider urban area within which</p>	<p>The proposed amended block D4 will, due to the proposed materials and its 9 storey height, continue to act as a focal point for the development and the wider area. It will guide</p>

<p>the development is situated and integrates in a cohesive manner.</p>	<p>people to both the proposed public plaza and the existing Luas stop.</p>
<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposed uses within block D4 remain unchanged from the permitted development, however the amount of amenity provision within this block has increased slightly by 9sqm.</p>
<p>At the scale of the site/building</p>	
<p>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</p>	<p>The proposed buildings have been carefully located to maximise natural light into each residential unit and on all public open spaces. Block D4 will not alter the position or footprint of any of the other buildings. The reduction in the height of block D4 as a result of this amendment will have a slight positive impact on the surrounding areas as it will reduce the impact on the adjacent permitted blocks within the development.</p>
<p>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'</p> <p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	<p>A Daylight and Sunlight note has been carried out by Avison Young for this amendment and has found that the proposed development performs well in terms of daylight and sunlight.</p>
<p>Specific Assessment</p>	
<p>Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall</p>	<p>A wind study has been carried out by IES for the parent permission which found the 13 storey building in this</p>

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.	location was acceptable. This is a reduction in building height so will have a similar impact.
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 amended Environmental Report accompanies this application which examines the impact of the development against all the topics in the EIAR. All consultants have confirmed that this amendment proposal will not have a detrimental impact on the natural ecology of the area.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	This will not be detrimentally impacted as a result of the reduction in height of the proposed development.
An assessment that the proposal maintains safe air navigation.	The proposed development is located outside of the noise and security Zones for Casement Aerodrome Baldonnell as per the SDCC County Development Plan. The site is also located outside similar zones for Dublin Airport. The subject site lies under the Casement's Inner Horizontal Surface and some of the proposed blocks extend above this surface. An Aeronautical Assessment has been carried out for this amendment application and has found that the proposal is acceptable.
An urban design statement including, as appropriate, impact on the historic built environment	A detailed Architectural Design Statement prepared by Reddy Architecture is submitted with this application.
Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.	The proposed planning application is accompanied by an Environmental Report (including Biodiversity chapter).

We note the following compliances with the Specific Planning Policy Requirements (SPPRs) of the Guidelines:

Specific Planning Policy Requirement	Evaluation of Consistency
SPPR 1 In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both	The proposed development is located immediately north of the Fortunestown Luas stop and there is a variety of excellent bus routes including the 65b, 77a, 175 adjacent to the site with future Bus Connects upgrade planned, and is

<p>redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p>	<p>therefore an ideal location for increased building height and density.</p>
<p>SPPR 2 In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</p>	<p>The proposed development alters the building height, units numbers and mix of the development. However, the uses within block D4 remain as permitted, although there is a slight increase in the amenity provision within this development. The proposed amendment is in line with the permitted development of the parent permission and also the proposed intended development of the wider LAP area.</p>
<p>SPPR 3 It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p>	<p>The proposal is in accordance with the Development Management Criteria as set out in the table above.</p> <p>This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p>

Local Policy

The subject site is within the administrative boundary of South Dublin County Council and as such is covered by the South Dublin County Council Development Plan 2016-2022.

South Dublin County Council Development Plan 2016-2022

The South Dublin County Development Plan 2016-2022 (hereafter Development Plan) sets out South Dublin County Council's objectives for the future development of the area.

Zoning

The subject site is zoned RES-N (residential) with the objective *to provide for new residential communities in accordance with approved area plans.*



Figure 1 Extract from Development Plan Map 8. Site marked with red star

RES-N Zoning	
Permitted in Principle	Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Housing for Older People, Industry-Light, Nursing Home, Offices less than 100 sq.m, Open Space, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential Institution, Residential , Restaurant/Café, Retirement Home, Shop-Local, Shop-Neighbourhood, Sports Club/Facility, Stadium, Traveller Accommodation, Veterinary Surgery.

Evaluation of Consistency

The proposed amendment to Block D4 to reduce the height to 9 storeys (from 13 storeys) and will reduce the number of units to 44 (from 60 no. units). The provision of residential units is permitted in principle in accordance with the land use zoning.

Chapter 2 outlines the aims and objectives for housing in the county. It notes that as South Dublin is a predominantly urban county, *new housing will be delivered in established areas through sustainable intensification, infill development and the re-use of brownfield lands while respecting the amenity value of existing public open spaces.* It also notes that new housing will take into account the *housing needs of the County's population and in particular changing demographic factors such as the decline in average household size and the increasing number of people aged over 65.*

This chapter includes policies and objectives in relation to housing supply, residential densities, creating sustainable neighbourhoods, residential building height, unit mix, and the quality of residential development.

Evaluation of Consistency

The proposal will provide a high density residential development on a site identified for housing in Citywest. The construction of the permitted development has commenced on site, with the basement underway. Although the proposed amendment will reduce the height and unit numbers of Block D4, it will provide a mix of 44 no units for an increase in population, supporting existing shops, facilities, and public transport routes, and allowing these existing facilities to grow and expand.

Parking

Section 11.4.1 sets out the *minimum* bicycle parking standards. Bicycle parking is divided into two categories – long term and short stay.

Category	Land-Use	Long Term	Short Stay
Accommodation	Residential Apartment	1 per 5 apartments	1 per 10 apartments

Table 6 Minimum Bicycle Parking Standards set out in SDCC Development Plan

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment/Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 space	1 space
	3+ Bed	1.5 space	1.25 space

Table 7 Maximum car parking standards for apartments/duplexes

The Development Plan requires all developments to *provide facilities for the charging of battery-operated cars at a rate of up to 10% of the total parking spaces.*

Evaluation of Consistency

The proposed amendment will not alter the provision of 650 no. cycle parking spaces which exceeds the Development Plan standards and will increase the net ratio of cycle parking per person.

We note the proposed amendment will not change the permitted no. car parking spaces. Condition 11(a) of the parent permission identifies 278 no car parking spaces are solely for residential use. This equates to 0.69 no. spaces per residential units which is below the maximum standards set out in the Development Plan but are in accordance with national guidelines. This ratio of parking is maintained in line with this condition. The remaining no. spaces are allocated for the retail/luas area and visitors, which is again below the maximum standards. A Parking Management Plan will be submitted inline with condition 11b of the parent permission. Given the highly accessible nature of the site, beside a luas line, multiple bus routes and the parent permission condition 11a this proposed quantum of car parking is considered to be acceptable.

10% of the car parking spaces will be designated for electric vehicles. Ducting will be provided to all car parking spaces to ensure future charging points can be accommodated.

Section 7.8 outlines the general restrictions and requirements on development within the county for Dublin Airport, Casement Aerodrome and Weston Aerodrome. This includes Obstacle Limitation Surfaces, such as the Inner Horizontal Surface, and safety and security zones. Section 11.6.6 provides further details on these restrictions and requirements for development near the airport and aerodromes.

Evaluation of Consistency

This reduction of height from 155.7m to 143.7m (12 metres) is in line with this policy and has been confirmed as appropriate by the Aeronautical Assessment. It is therefore considered that the proposed development is in accordance with the aims and objectives of the Development Plan in relation to airports and aerodromes.

The table below outlines the consistency of the proposed development with the relevant policies and objectives relating to the proposed development.

Policy/Objective	Evaluation of Consistency
Housing	
Policy H2 (including H2 Objective 1) seeks to ensure that sufficient zoned land continues to be available at appropriate locations.	The site of the proposed development is zoned RES-N to provide for new residential communities.
Policy H6 supports the development of sustainable communities in accordance with Government policy.	The proposed amendment has been designed in compliance with the provisions of the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009</i> , the <i>Urban Design Manual 2009</i> and the <i>Design Manual for Urban Roads and Streets</i> . The layout of the site, footprint of buildings and all amenity and landscaping will remain unchanged from the parent permission as a result of this reduced height.
Policy H7 (including H7 Objectives 1-4) supports high quality design in all new residential developments that complies with Government guidance.	
Policy H8 (including H8 Objectives 1-7 and H8 SLO1 and H8 SLO2) promotes higher residential densities at appropriate locations.	The proposed amendment will generate a density of an appropriate level in line with national policy (119 units/ha) for overall development considering the location and proximity to transport links, significant employment centres and local services and amenities. This is considered acceptable given the density of the parent permission.
Policy H17 (including Objectives H17 1-7 and H17 SLO1) supports residential consolidation and sustainable intensification at appropriate locations.	
Policy H9 (including H9 Objective 1-5) supports varied building heights across residential and mixed use areas in South Dublin County	The proposed amendment will reduce the height of Block D4 from 13 storeys to 9 storeys. As part of a wider residential scheme the amended height will still provide a variation of height from the permitted surrounding buildings. The proposed amended height will integrate well with and positively contribute to the surrounding context. As set out above the building height proposed are fully in compliance with the building height guidelines and the parent permission. The proposed heights are in line with national policies and guidelines and the reduction in height from the permitted development is in line with the objectives of this policy.

Policy H10 (including H10 Objective 1) supports a wide variety of adaptable housing types, sizes and tenures.	The proposed amendment to Block D4 will provide additional window in the 3 bed Type 1 units. This will provide more windows and surveillance from the southern façade onto the plaza.
Policy H13 (including H13 Objective 1, 2 and 3) requires all dwellings to have access to high quality private and semi-private open space.	All dwellings will have private open space in balconies or terraces. These private open spaces have been designed in accordance with all best practice guidelines. This is in line with the apartment guidelines All communal and public open spaces will remain as permitted.
Policy H14 (including H14 Objective 1 and 2) requires a high standard of flexible and adaptable accommodation.	The proposed development and all proposed residential units have been designed in accordance with the 2020 Apartment Guidelines and all relevant guidance. Please see the Housing Quality Assessment prepared by Reddy Architecture +Urbanism for further detail.
Policy H15 (including H15 Objective 1-5) promotes a high standard of privacy and security for existing and proposed dwellings.	All private open spaces accompanying each dwelling are positioned as in the parent permission and will continue to ensure appropriate levels of privacy are achieved.
Transport and Mobility	
Policy TM2 Public Transport	The proposed amendment will not alter the plans of the granted parent permission to support sustainable movement and transport.
Policy TM3 Walking and Cycling	
Policy TM7 Car Parking	
Policy TM6 Road and Street Design	
Infrastructure and Environmental Quality	
Policy IE1 Water & Wastewater	The proposed water and drainage infrastructure systems have been carefully designed by DBFL as part of the parent permission. Please see DBFL's documents for further details.
Policy IE2 Surface Water & Groundwater	
Policy IE3 Flood Risk	
Policy IE5 (and IE5 Objectives 1-8) relate to waste management.	Byrne Environmental have prepared a <i>Construction and Demolition Waste and By-Product Management Plan</i> and an <i>Operational Waste Management Plan</i> for the parent permission. This will remain unchanged as a result of this application.
Policy IE7 (and IE7 Objectives 1-5 and IE7 SLO 1) seeks to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity	An Environmental Report has been submitted with this application. This report is an addendum to the EIAR of the parent permission. In line with condition 2 of the parent permission all mitigation measures from the EIAR will be implemented for this development.

Policy IE8 relates to the safeguarding of the safety and technical requirements of Casement Aerodrome.	We note the building is a reduction in height from 155.7m to 143.7m (12 metres). This reduced height meets the IE8 objective 3.
Green Infrastructure	We note the proposed amendment does not alter the green infrastructure or landscaping of the parent permission which includes large open green space.
Policy G1 Overarching	
Policy G2 Green Infrastructure Network	
Policy G3 Watercourses Network	
Policy G4 Public Open Space and Landscape Setting	
Policy G5 Sustainable Urban Drainage Systems Policy G6 New Development in Urban Areas	

Evaluation of Consistency

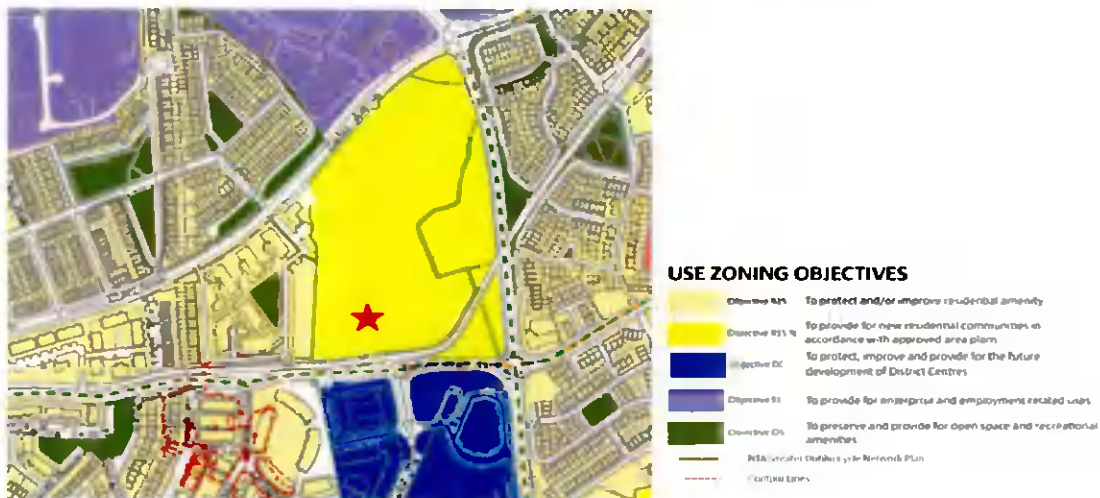
Overall, it is considered that the proposed amendment is in accordance with the policies of the SDCC Development Plan. While it is noted the proposed amendment will reduce the height of Block D4 and the number of units provided by the overall residential development, the reduction in height of Block D4 is considered to be appropriate to the development and the wider area. The proposed amendment is in line with the provision residential development on residentially zoned land. The apartment block D4 will still contribute to an increase the housing stock in the area and have been designed to a high-quality standard.

Draft South Dublin County Council Development Plan 2022-2028

The Draft South Dublin County Development Plan 2022-2028 (hereafter Development Plan) sets out South Dublin County Council’s draft objectives for the future development of the area. The proposed material amendments are indicated in Red and Green text throughout (as per the text that had been uploaded on the SDCC website).

Zoning

The new district at Fortunestown is a key development area located within the neighbourhood, identified for residential growth. The subject site is zoned RES-N (residential) with the objective to *provide for new residential communities in accordance with approved area plans*.



RES-N Zoning	
Permitted in Principle	Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Housing for Older People, Industry-Light, Nursing Home, Offices less than 100 sq.m, Open Space, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential Institution, Residential, Restaurant/Café, Retirement Home, Shop-Local, Shop Neighbourhood, Sports Club/Facility, Stadium, Traveller Accommodation, Veterinary Surgery.
<p>Evaluation of Consistency The proposed amendment to Block D4 to reduce the height to 9 storeys (from 13 storeys) and will reduce the number of units to 44 (from 60 no. units). The provision of residential units is permitted in principle in accordance with the land use zoning.</p>	

Parking

Section 13.8.1 sets out the *minimum* bicycle parking standards. Bicycle parking is divided into two categories – long term and short stay.

Category	Land-Use	Long Term	Short Stay
Accommodation	Residential Apartment	1 per bedroom	1 per 2 apartments

Table 8 Minimum Bicycle Parking Standards set out in SDCC Development Plan

Section 13.8.2 sets out the Maximum Parking rates for non-residential and residential development

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment/Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 space	1 space
	3+ Bed	1.5 space	1.25 space

Table 9 Maximum car parking standards for apartments/duplexes

The Development Plan requires all developments to *provide facilities for the charging of battery-operated cars at a rate up to 15%–20% a minimum of 20% of the total parking spaces.*

<p>Evaluation of Consistency The proposed amendment will not alter the provision of 650 no. cycle parking spaces which exceeds the Development Plan standards which will increase the net ratio of cycle parking per person.</p> <p>We note the proposed amendment will not change the permitted no. car parking spaces. Condition 11(a) of the parent permission identifies 278 no car parking spaces are solely for residential use. This equates to 0.69 no. spaces per residential units which is below the maximum standards set out in the Development Plan but are in accordance with national guidelines. The remaining no. spaces are allocated for the retail/luas area and visitors, which is again below the maximum standards. However, given the highly accessible nature of the site, beside a luas line and multiple bus routes this proposed quantum of car parking is considered to be acceptable.</p> <p>The draft development plan states <i>up to 15%–20% a minimum of 20%</i> of the total parking spaces provided be EV charging. However, 10% of the car parking spaces will be designated for electric vehicles in line with the current development plan and the permitted parent permission. Ducting will be provided to all car parking spaces to ensure future charging points can be accommodated.</p>

Section 11.7 outlines the general restrictions and requirements on development within the county for Dublin Airport, Casement Aerodrome and Weston Aerodrome. This includes Obstacle Limitation Surfaces, such as the Inner Horizontal Surface, and safety and security zones. Section 11.7.2 provides further details on these restrictions and requirements for development near the casement aerodromes.

Evaluation of Consistency

This reduction of height from 155.7m to 143.7m (12 metres) is in line with this policy and has been confirmed as appropriate by the Aeronautical Assessment. It is therefore considered that the proposed development is in accordance with the aims and objectives of the Development Plan in relation to airports and aerodromes.

Quality Design & Healthy Placemaking

Policy	Evaluation of consistency
Quality Design & Healthy Placemaking	
Policy QDP1: Successful and Sustainable Neighbourhoods (including QDP1 objectives 1-6) Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities	The amendment proposal will continue to provide a high density residential development on a site identified for housing in Fortunestown in line with the parent permission.
Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods (including QDP2 objectives 1 & 2) Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County	The design of the wider parent permitted development incorporates these principles and this amendment proposal will not alter this.
Policy QDP4: Healthy Placemaking (including QDP4 objectives 1 & 2) Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.	
Policy QDP7: High Quality Design – Development General Realm (including QDP7 objectives 1-12) Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.	
Policy QDP8: High Quality Design – Building Height and Density Guide (BHDG) (including QDP8 objectives 1 & 2) Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set	The proposed amendment involves reducing the height of Block D4 from 13 no. storeys to 9 no. storeys. The proposed amended height will remain in line with the BHDG.

out in the South Dublin County's Building Heights and Density Guide 2021.	
Policy QDP9: High Quality Design - Building Height and Density (including QDP9 objective 1 Apply a context driven approach to building heights in South Dublin, as supported by South Dublin's Building Heights and Density Guide	The proposed amendment will not alter the context or character of the overall development of the permitted parent application.
Policy QDP10: Mix of Dwelling Types (including QDP10 objective 1 & 2) Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028	The proposed amendment to Block D4 will alter the 3 bed unit type 1 to improve it to provide more windows facing onto the plaza. However, the overall unit types and sizes will remain similar to the parent permission.
Policy QDP11: Materials, Colours and Textures (including QDP10 objective 1-3) Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.	The proposed amendment is of high quality that incorporates sustainability and energy efficiency into its design. It also includes solar PV panels on the roof of Block D4.

Housing

Policy	Evaluation of consistency
Policy H1: Housing Strategy and Interim Housing Needs Demand Assessment (including H1 objectives 1-19) Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (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	The proposed development is a slight amendment to the parent permission and will reduce down the number of units by 16, however, the overall mix and type is similar to the parent permission and is currently under construction on site. The proposed amendment will reduce the number of residential units but is part of a larger residential development that provides a mix of housing types suitable for a variety of people.
Policy H3: Housing for All (including H3 objectives 1-9, SLO 1, SLO 2) Support the provision of accommodation for older people and people with disabilities and/or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.	
Policy H7: Residential Design and Layout (including H7 objective 1-4) Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and	The proposed amendment will not alter the parent permission in terms of building footprint or layout of the site. The parent permission is in compliance with the provisions of the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009</i> and the <i>Urban Design Manual 2009</i>

the overall layout and appearance of the development.	
<p>Policy H10: Internal Residential Accommodation (including H10 objective 1-3) 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.</p>	The proposed development and all proposed residential units have been designed in accordance with the 2020 Apartment Guidelines and all relevant guidance. Please see the Housing Quality Assessment prepared by Reddy Architecture +Urbanism for further detail.
<p>Policy H11: Privacy and Security (including H11 objective 1-4) Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</p>	The private open spaces will be located and sized as in the parent permission.
<p>Policy H13: Residential Consolidation Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.</p>	The proposal supports sustainable intensification on appropriate zoned lands

Sustainable movement

Policy	Evaluation of consistency
Policy SM1: Overarching – Transport and Movement	The proposed amendment will not alter the plans of the granted parent permission to support sustainable movement.
Policy SM2: Walking and Cycling	
Policy SM3: Public Transport – General	
Policy SM5: Street and Road Design	
Policy SM6: Traffic and Transport Management	
Policy SM7: Car Parking and EV Charging	

Evaluation of Consistency

Overall, it is considered that the proposed amendment is in accordance with the policies and standards of the SDCC Draft Development Plan. It is noted the proposed amendment will reduce the height of Block D4 and the number of units provided by the overall residential development, however, the reduction in height of Block D4 will provide a block that fits within the context of the parent permission and the overall development. This amendment application will not alter the positive contribution to the green infrastructure network. The apartment block will still increase the housing stock in the area and have been designed to a high quality standard.

Fortunestown Local Area Plan – May 2012



The Fortunestown Local Area Plan (LAP) was adopted in May 2012 for a period of 6 years. The LAP was subsequently extended in 2017 for a further 5 years. As a result, this LAP will remain in place until 2022.

The LAP covers an irregularly shaped area within Cooldown Commons in Fortunestown. The vision for the plan lands is to create a vibrant district, a series of neighbourhoods, distinct pedestrian and cyclist links, safe useable green spaces and to provide a balanced mix of residential accommodation.

When the LAP was originally adopted c. 90% of the plan lands were undeveloped. However, many of the plan lands have recently received planning permission for residential developments and are currently under construction. Further details of these recently granted permissions can be found in the planning history section of the Planning Report.

The following table sets out the policies and objectives relevant to the proposed development.

Policy Objective	Evaluation of Consistency
Accessibility and Movement (Section 5.2)	
That future development will be mainly focused around the four Luas stops, especially the Fortunestown Stop at the District Centre and will create or facilitate direct routes to these stops. (Objective AM1)	The site of the proposed amendment is in close proximity to the Fortunestown Luas stop and will create a new public plaza and provide residential development
That all planning applications for residential and employment development are required to provide or integrate with direct, safe, and attractive pedestrian and cyclist routes to public transport stops. (Objective AM2)	The proposed amendment does not change the permitted parent application incorporation of pedestrian, cyclist and vehicular routes through the development connect with the Luas stop. The proposed links also provide ease of access to the various bus stops within the vicinity of the site
Encourage cycling within and through the Plan Lands by creating an open ended and integrated network of safe and accessible cycle routes that serve primary, secondary, and tertiary streets and spaces. Cycle paths that correspond with vehicular routes shall be provided on-street on both sides and shall be separated from pedestrian routes. (Objective AM3)	The proposed amendment does not change the permitted layout which creates a predominantly car free network of routes with connect the application site to the wider area ensuring safe and easy access for pedestrians and cyclists to the wider area.
Objective AM5 requires adequate facilities for cyclists including secure and sheltered bicycle parking.	The proposed amendment does not change the permitted bicycle parking.
That pedestrian routes are provided on both sides of every street and through every public space in a manner that creates direct and indirect links with nodal points, civic uses, public open spaces and with the District Centre. (Objective AM6)	The proposed amendment does not change the permitted pedestrian/cycle routes within the development.

<p>To create a network of pedestrian routes between destinations including housing, business parks, employment areas and public transport stops and to make walking, cycling and the use of public transport a priority. (Objective AM7)</p>	
<p>Achieve an integrated network of safe pedestrian and cycle routes in line with 'A Proposal for Connected Walking and Cycling Routes through the Parks, Open Spaces and Roads of South Dublin County' (2006) by utilising links through and along parks, open spaces, and green corridors. (Objective AM8)</p>	
<p>That movement corridors within new developments are based on a grid format that avails of every possibility to link into the existing street network and provide efficient connections to existing local facilities. The grid shall align with desire lines and link sites to specific destinations. Footpaths shall be provided on either side of every street and shall be direct, safe, barrier free and overlooked by development. (Objective AM12)</p>	<p>The proposed amendment to Block D4 will not impact on the apartment block layout of the wider residential scheme that has been designed to reflect the grid pattern set out in the LAP.</p>
<p>Land Use and Residential Density (Section 5.4)</p>	
<p>Ensure that no more than 10% of dwellings in any residential scheme are of the one bedroom type. (Objective LUD8)</p>	<p>The proposed amendment will result in 31% one beds being provided. Although this is above the maximum of 10% it is appropriate considering 30% one beds were permitted for the parent application and is in line with the national policy of compact growth and urban consolidation and the Apartment Guidelines 2020.</p>
<p>Disperse social housing throughout the area as facilitated by Applicant Sourced Housing and Rental Accommodation Schemes. (Objective LUD9)</p>	<p>In accordance with Part V and this objective 10% of the overall residential development will be social housing and will be dispersed throughout the development.</p>
<p>Ensure that a minimum of 85% of all dwellings be provided as own door houses on their own site and that a maximum of 15% of all dwellings across the Plan Lands be provided as apartments/duplexes with such dwellings limited to appropriate areas or particular locations such as Luas stops and landmark junctions and sensitively designed to contribute to the broader aesthetics of the area including the nearby mountains. The minimum average floor area of all developments throughout the Plan Lands shall be 110 sq. metres. (Objective LUD 10)</p>	<p>The proposed mix, including the alterations as a result of this amendment, is in line with the Apartment Guidelines 2020.</p> <p>It is also that this mix, albeit slightly amended, is similar to that permitted in the parent permission. This will alter the mix slightly, with a small increase in the number of 1 beds and slight reduction in 3 beds by 1% overall. This is considered to be a slight and insignificant change. This mix and type of units is appropriate to its location next to the luas stop, the Apartment Guidelines and the new Draft SDCC Development Plan.</p>

To encourage a mix of dwelling types and quality design that will help aid legibility and way finding throughout the area. (Objective LUD 11)	The proposed amendment will not alter the arrangement & layout of apartment blocks or the public plaza by the Luas stop to aid legibility and way finding.
Building Height (Section 5.5.4)	
There shall be a maximum height limit of three storeys, with exceptions justifiable only in limited exceptional circumstances.	The proposed amendment will reduce the storey height of Block D4 from 13 no. storeys to 9 no. storeys. This amended height remains proportionate to the wider residential scheme. This height is justified by the site's location and the national Building Height guidelines.
Residential development should create a strong built edge along main streets subject to the protection of residential amenity especially access to sun/day light.	The proposed amendment will continue to provide a strong urban frontage to the development's internal streets.
Development immediately adjoining areas of existing one, two and three storey housing should seek to ensure a gradual change in building heights with no significant marked increase in height within transitional areas. Development backing on to existing buildings must respect existing context building heights.	The proposed amended height to Block D4 will remain in proportionate to the permitted residential development.
Landmark Opportunities and Gateways Treatments (Section 5.5.5)	
Such buildings/structures are permissible at various points throughout the Plan Lands at places that define the location of transport interchanges, significant areas of open space and vistas. Gateway opportunities are identified at major junctions where there is a convergence of key vehicular and pedestrian routes on entering the Plan Lands.	While the amendment proposes a reduction in height from 13 no. storeys to 9 no. storeys of Block D4, the permitted material and the proposed amendment to the windows on the southern façade will ensure that Block D4 maintains its purpose as providing a visual focal point in the area.
Landmark and gateway buildings/treatments will therefore only be permissible where they perform a clear way-finding function and contribute to the legibility of the area.	

Evaluation of Consistency

Overall, it is considered that the proposed amendment is in general accordance with the Fortunestown Local Area Plan, the parent permission and National Planning Guidelines (which take precedent over the LAP). The proposed amendment of the development would not cause any new or more significant impacts to the wider site and remains in line with the parent permission and national policy.

The proposed amendment will continue to provide an appropriate mix of units. The proposed amendment will not alter permitted links into the neighbouring developments, large areas of public open space, high quality layout and landscaping of the scheme or the attractive architecture ensuring wayfinding, legibility, and connectivity to the wider area.

Conclusions

In conclusion, the principle a residential building has been granted under ABP 310570-21 and through the zoning of this site for residential development. This is an amendment to the permitted 13 storey building to reduce it by 4 storeys down to 9 storeys in height. This will result in a change to the number of units approved on this site 44 (with the wider site parent permission reducing to 405), and an increase in the internal amenity space. All other elements within the permitted development in terms of quantum of public and communal open space, building foot prints, site layouts and landscaping will remain unchanged.

The reduction in height will alter the appearance of the development from the immediate vicinity, however it will not alter the character of the overall proposal when viewed from the wider site context. This is assessed in the LVIA in the Environmental Report and in the Architects Design Statement. The use of the materials will still provide a legible landmark building on the plaza enabling way finding through the development.

This is an area which is the subject of high transition with multiple permissions under construction or recently granted, including the subject application site, which currently has a basement completed. It is an ideal site for residential development and this change to the building height within this context will be viewed as only a minor amendment when viewed within the context of the wider developments.

The proposed building height of 9 storey, amended density, and mix, while contrary to the 2012 LAP, are in conformity with the current Building Heights Guidelines 2018, the Apartment Guidelines 2018, and the National Planning Framework, which the LAP is not. This is confirmed by An Bord Pleanála through their grant of the permission ABP 310570-21. The overall unit mix remains proportionate to that of the approved scheme and the building height remains within the context of the permitted scheme currently under construction and the multiple developments in the surrounding area, of a scale that is appropriate not only to the application site but also to the neighbourhood and also to the wider town of Citywest/ Fortunestown Lane.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional, and local planning policies and guidance and will provide a high quality living environment on this underutilised site.