

STATEMENT OF CONSISTENCY

PROPOSED STRATEGIC HOUSING DEVELOPMENT

NO. 2 FIRHOUSE ROAD AND THE FORMER 'MORTON'S, THE FIRHOUSE INN', FIRHOUSE ROAD, DUBLIN 24



PREPARED FOR:
BLUEMONT DEVELOPMENTS
(FIRHOUSE) LIMITED

PREPARED BY:
TOM PHILLIPS + ASSOCIATES
TOWN PLANNING CONSULTANTS
80 HARCOURT STREET
DUBLIN 2
D02 F449

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TOWN PLANNING CONSULTANTS

CONTENTS

1.0	INTRODUCTION	1
1.1	Introduction	1
1.2	Legislative Context	1
1.3	Outline of This Report	1
1.4	Policy Documents.....	1
2.0	DESCRIPTION OF PROPOSAL	2
2.1	Site Location.....	2
2.2	Proposed Development Description	3
3.0	STRATEGIC POLICY	5
3.1	Introduction	5
3.2	<i>National Planning Framework (Ireland 2040 – Our Plan)</i>	5
3.3	<i>Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031</i>	9
3.4	<i>Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)</i>	11
3.5	Urban Design Manual – A Best Practice Guide (2009).....	14
3.6	<i>Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)</i>	22
3.7	Childcare Facilities Guidelines (2001)	28
3.8	Part V of the <i>Planning and Development Act 2000: Guidelines (2017)</i>	29
3.9	<i>Design Manual for Urban Roads and Streets (DMURS) (2019)</i>	29
3.10	<i>The Planning System and Flood Risk Management (2009)</i>	31
3.11	Urban Development and Building Heights: Guidelines for Planning Authorities (2018)..	32
3.12	<i>Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities</i>	43
3.13	Rebuilding Ireland: Action Plan for Housing and Homelessness (2016).....	44
4.0	LOCAL POLICY	46
4.1	Introduction	46
4.2	<i>South County Council Development Plan 2016 – 2022</i>	46
4.2.1	Core Strategy.....	46
4.2.2	Land Zoning.....	48
4.2.4	Compliance with Policies of the <i>South Dublin County Council Development Plan 2016-2022</i>	50
4.2.5	Compliance with the Development Management Standards within the <i>South Dublin County Council Development Plan 2016-2022</i>	79
4.2.6	Emerging Policy.....	87

5.0 CONCLUSION 88

APPENDIX A - Planning Statement of Consistency Relating to The Compliance of The Proposed Development with the *Draft South Dublin County Development Plan 2022-2028* (Including Proposed Material Alterations)..... 89

1.0 INTRODUCTION

1.1 Introduction

This *Statement of Consistency* is prepared for the purposes of demonstrating the extent to which the proposed residential development located at No. 2 Firhouse Road and The Former 'Morton's, The Firhouse Inn', Firhouse Road, Dublin 24 is consistent with the relevant policies pertaining to the site at national, regional, and local levels.

1.2 Legislative Context

In accordance with Section 4(1) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, Bluemont Developments (Firhouse) Limited, intends to apply for planning permission in respect of a proposed Strategic Housing Development (SHD) at No. 2 Firhouse Road and the former 'Morton's, The Firhouse Inn', Firhouse Road, Dublin 24. The subject report constitutes the *Statement of Consistency* required to support the application.

1.3 Outline of This Report

This *Statement of Consistency* provides a list of the various statutory and strategic policy documents considered. The Statement continues to demonstrate full consistency with the pertinent Development Plan, and the relevant S.28 Guidelines and National Policy.

1.4 Policy Documents

The following policy documents have informed this Statement of Consistency:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*;
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
4. *Urban Design Manual: A Best Practice Guide (2009)*;
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
6. *Childcare Facilities – Guidelines for Planning Authorities (2001)*;
7. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
8. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
9. *Urban Development and Building Heights, Guidelines for Planning Authorities Consultation Draft August (2018)*;
10. *The Planning System and Flood Risk Management (2009)*;
11. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
12. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
13. *South Dublin County Council Development Plan 2016-2022*; and
14. *Draft South Dublin County Development Plan 2022 – 2028*.

2.0 DESCRIPTION OF PROPOSAL

2.1 Site Location

The subject site is located to the northwest of the Firhouse Road (R114) and Ballycullen Road Junction, on a main arterial route connecting the Rathfarnham / Templeogue & Ballyboden areas with Firhouse and Knocklyon in Firhouse, Dublin 24. The site is occupied by a number of single and two storey buildings, including the former 'Morton's The Firhouse Inn' and adjoining off licence (which has ceased trading), a betting office, barbers and extensive surface car parking. Primary access to the site is currently via Firhouse Road, while secondary access is via a local access road to Mount Carmel Park (a low-medium density residential development).

The southern site boundary has extensive frontage to Firhouse Road. The adjoining lands to the west and north are believed to be owned by Ballyboden St. Enda's GAA club. The River Dodder and Dodder Valley Park are located in surrounding lands further north. The surrounding area primarily comprises established residential housing estates (predominantly semi-detached) and public/private open spaces, with some local shops and services also in the vicinity. The prevailing building height ranges from 2-3 storeys. No residential developments directly adjoin the site, however, dwellings within Mount Carmel Park sits opposite the proposed development to the east.



Figure 2.1: Indicative location of the subject site (outlined in red) and the surrounding context (source: Google Maps, cropped and annotated by TPA, 2022.)

2.2 Proposed Development Description

The development description is noted as follows in the statutory notices;

'Bluemont Developments (Firhouse) Limited intend to apply to An Bord Pleanála (the Board) for a Strategic Housing Development with a total site area of c.0.46 ha, on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24.

The development will consist of the demolition of all existing structures on site (c. 1,326 sq m), including:

- *Two storey building formally used as public house, ancillary off-licence and associated structures (c. 972 sq m);*
- *Two storey building comprising an existing barber shop and betting office (c. 260 sq m);*
- *Single storey cottage building and associated structures (c. 94 sq m); and*
- *Eastern boundary wall and gated entrance from Mount Carmel Park.*

The development with a total gross floor area of c. 11,638 sq m, will consist of 100 no. residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising:

- *96 no. apartments (consisting of 2 no. studio units; 45 no. one bedroom units; 10 no. two bedroom (3 person) units; 34 no. two bedroom (4 person) units; and 5 no. three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels; and*
- *4 no. duplex apartments (consisting of 2 no. one bedroom units and 2 no. two bedroom units (4 person) located within Block 01, together with private balconies and terraces.*

The development will also consist of non-residential uses (c. 355 sq m), including:

- *1 no. café (c. 58 sq m) and 1 no. office (c. 30 sq m) located at ground floor level of Block 01;*
- *1 no. medical unit (c. 59 sq m) and 1 no. betting office (c. 66 sq m) located at ground floor level of Block 02;*
- *1 no barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and*
- *1 no. crèche (c. 114 sq m) located at lower ground floor level of Block 01 and associated outdoor play area to the rear.*

Vehicular access to the site will be from the existing access off Firhouse Road. The proposal includes minor alterations to the existing access, including the provision of new and enhanced pedestrian infrastructure.

The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, basement car parking (80 no. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and

connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; stormwater management and attenuation; sustainability measures; signage; changes in levels; public lighting; and all ancillary site development and excavation works above and below ground.'

The proposed development will have a gross density of c. 217 No. units per hectare. We contend that this density is appropriate for the site having regard to the following:

1. The *National Planning Framework (Ireland 2040 – Our Plan)*, RSES, and *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020)*, which promote higher residential densities and consolidation in the Greater Dublin Area (GDA);
2. The proximity of the site to high quality bus corridors;
3. The site's proximity to a range of facilities and amenities including the Dodder Valley Park, Tymon Park, playing pitches, sports centres employment centres, schools, community centres, libraries and TU Dublin University, Tallaght, among others;
4. The provision of a mix of land uses at ground floor level which will benefit future residents of the proposal and the local community;
5. The provision of high-quality open space and public realm; and
6. The infrastructural capacities in the area, including, inter alia, the roads and drainage networks.

The supporting documentation enclosed demonstrates that the proposed scheme will not negatively impact upon the neighbouring land uses nor contravene the site's land use zoning 'LC-Local Centre', which aims '*to protect, improve and provide for the future development of Local Centres.*'

For example, the proposed building heights conform with building heights criteria as provided for in the *Urban Development and Building Height Guidelines (2018)*, allowing for the increase in residential densities whilst simultaneously guarding against any potential undue overshadowing or overlooking impacts arising from the proposed development. In addition to the high-quality design approach that has been adopted for the residential units, the proposed landscaping plans for the proposal will ensure from the outset that the proposed development is welcoming to the local and wider community. Further information on the proposed development is outlined in the documentation accompanying this planning application.

3.0 STRATEGIC POLICY

3.1 Introduction

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following Sections. The key policy and guidance documents of relevance to the proposed development are as follows:

3.2 *National Planning Framework (Ireland 2040 – Our Plan)*

The *National Planning Framework* (NPF) is the Government’s plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

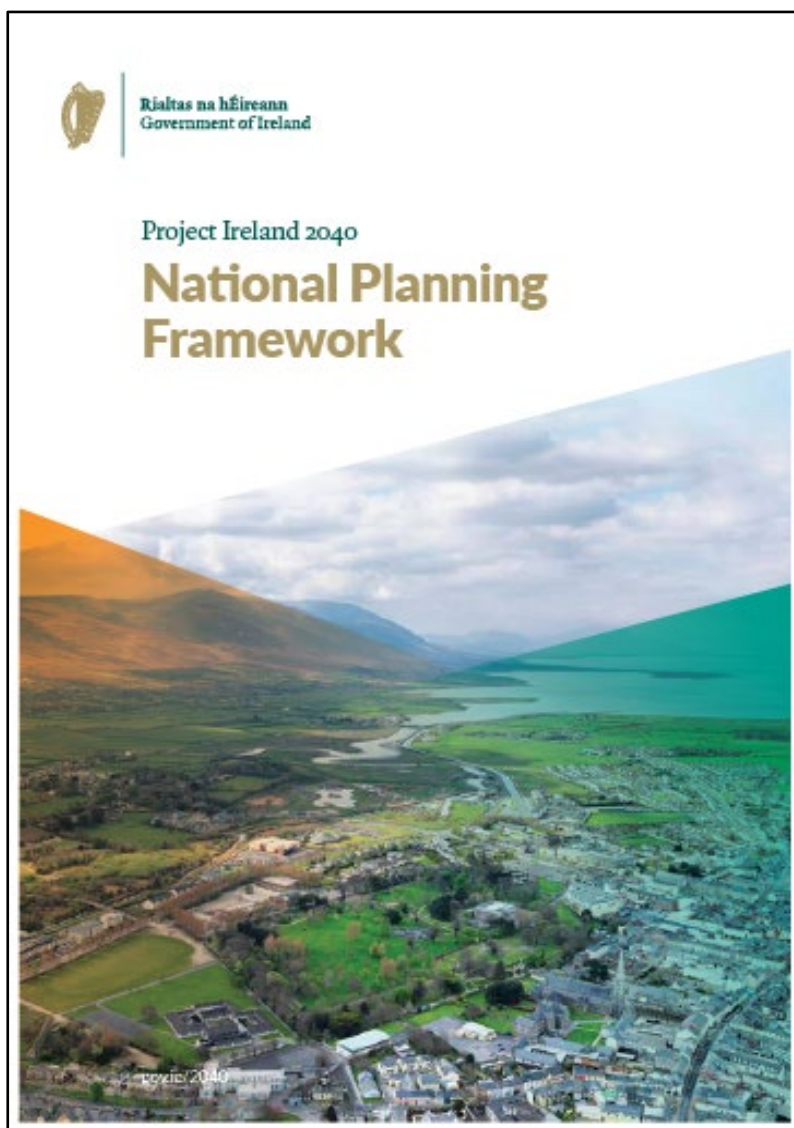


Figure 3.1: Cover page of the *National Planning Framework (Ireland 2040 - Our Plan)*.

The Framework focuses on:

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

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

Under the heading of 'Compact Growth', the NPF is:

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

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

The NPF further notes in National Policy Objective 10:

'There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth'.

It is submitted that the proposed development is consistent with the objectives of the NPF in seeking to consolidate and densify an urban area proximate to primary transport routes. It states that the key test is meeting appropriate planning standards, which should be performance-based to ensure well-designed, high-quality outcomes, rather than absolute in all cases.

National Policy Objective 13 states that:

'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'.

In response to NPF Objective 13, we note that the proposed development will provide for increased heights and densities (c. 217 units per hectare) in a high-quality urban design to achieve targeted growth of the area. The proposed development will also provide for reduced car parking standards. The basement carpark will include 80 No. spaces (62 No. of which are allocated to the residential units) and a further 5 No. car parking bays to serve the creche (incl. 2 No. family spaces). The ratio of 0.63 spaces per residential unit is appropriate given the location of the site, in particular close to a public transport corridor, high quality pedestrian and cyclist infrastructure, and locations of employment.

Although sometimes necessary to safeguard against poor quality design, the NPF notes that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. This is important to note in the context of where the provisions of the NPF supersede prescriptive development management criteria as provided within a Development Plan. In particular, National Policy Objective 35 provides a clear reflection of the policy move towards compact growth and the more efficient use of serviced and zoned lands.

National Policy Objective 35 states that:

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

The proposed development for a mixed use, primarily residential, scheme on this brownfield site represents an opportunity to provide for increased densities and increased heights in accordance with the NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development ranges in height from 3 to 5 No. storeys (over lower ground floor and basement levels) and is therefore considered appropriate in this location and in accordance with other National Policy Objectives (NPOs) set out below (note: this is not an exhaustive list):

- **National Policy Objective 2a** – *A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.*
- **National Policy Objective 3b** – *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*

- **National Policy Objective 5** - *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*
- **National Policy Objective 6** - *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*
- **National Policy Objective 7** - *Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- **Dublin**; the four Cities of Cork, Limerick, Galway and Waterford; Strengthening Ireland's overall urban structure, ... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs ... In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.*
- **National Policy Objective 8** – *To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.*
- **National Policy Objective 11** - *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*
- **National Policy Objective 28** - *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*

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

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

3.3 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

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

The proposed development is located within the Dublin Metropolitan Area and the Dublin – Belfast Economic Corridor and the Dublin City and Suburbs settlement as identified in the Strategy. The RSES includes an objective to prepare a Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands throughout the City’s Metropolitan area to support Dublin’s sustainable growth and continued competitiveness. The Strategy reiterates the NPF principle of compact and sustainable growth with a target of 30-40% of new homes to be built on land within the built-up area. Within the Dublin City and Suburbs area, the RSES supports the consolidation and re-intensification of infill, brownfield and underutilised sites through Regional Policy Objective 4.3, which also seeks to ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

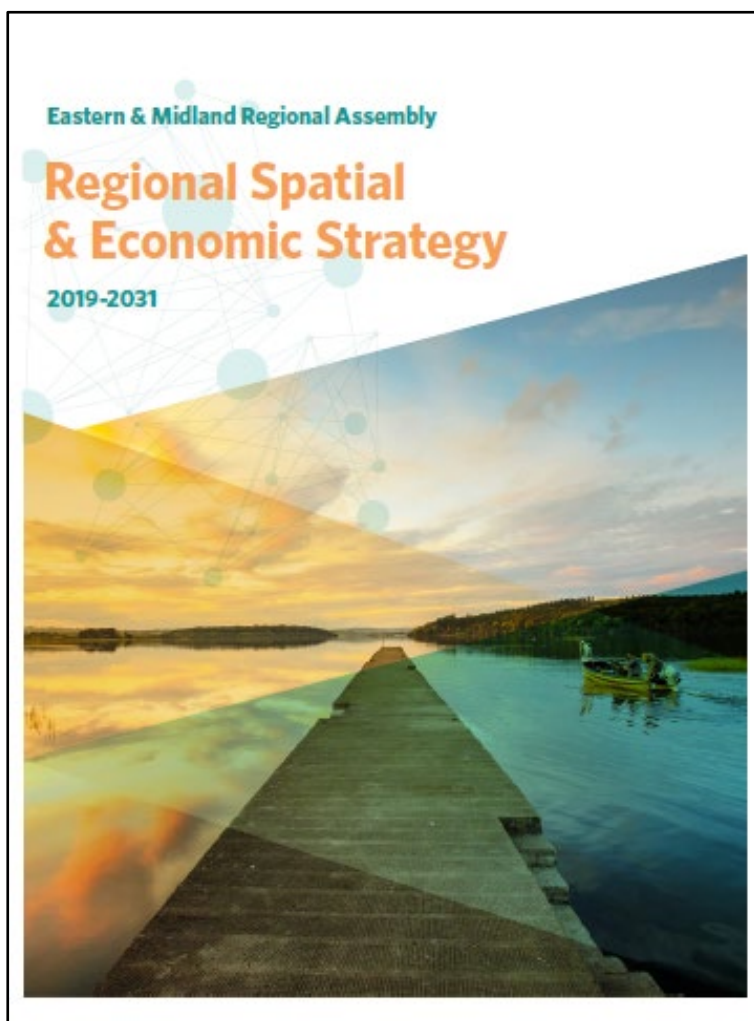


Figure 3.2: Cover of *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*.

The RSES aims to deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing. The MASP further supports the consolidation of Dublin City and Suburbs with a target population of 1.65 million people in the area by 2031, an increase of 250,000 people or 18% on 2016.

The RSES provides a spatial strategy, economic strategy, metropolitan plan, investment framework and climate action strategy. It notes that the Region is young in demographic terms (1 in 5 people under 14 years of age) but ageing rapidly with a significant increase in those aged over 65 expected by 2031. There will also be a significant increase in the 15-24 years age cohort with the trend toward smaller and one-person households forecast to continue.

The purpose of the Strategy is to support the implementation of Project Ireland 2040 by providing a long-term strategic planning and economic framework for the development of the Regions. A Metropolitan Area Strategic Plan (MASP) is provided in order to deliver compact regeneration and growth in the Dublin metropolitan area.

The proposed development is designed to utilise a site in an urban context in close proximity to a variety of amenities and services. The proposed SHD, which provides for a density of c. 217 units per hectare, is located within a 10-minute walk from several existing bus services, planned BusConnects routes and the Greater Dublin Metropolitan Cycle Network, and therefore complies, in full, with the following policies:

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

‘RPO 5.2: Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, Bus Connects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.’

The proposed development will serve to regenerate an urban compact site and is supported by the policies of Compact Urban Development in the RSES.

‘RPO 3.2: Local Authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and at least 30% of all new homes within or contiguous to the built-up area of metropolitan settlements within the wider Dublin metropolitan area.’

In our opinion, the proposed development is in full accordance with the objectives of the RSES realising the potential of brownfield lands in the consolidation of Dublin and its suburbs.

Section 5.4 onwards has regard to 'Appropriate locations for increased densities' and states that in general, increased densities should be encouraged on residentially zoned lands and particularly in the locations listed below (not exhaustive):

- City and town centres;
- Brownfield sites (within city or town centres);
- Public transport corridors; and
- Inner suburban / infill.

In relation to 'Brownfield' sites (within city or town centres), the Guidelines state:

“Brownfield’ lands, which may be defined as “any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces”, generally comprise redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas. Where such significant sites exist and, in particular, are close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car-free developments at these locations.” (our emphasis.)

Having regard to the above criterion, we identify the subject lands as a brownfield site on the basis that it has been subject to building and engineering operations. We therefore confirm that the above guideline, which promotes the redevelopment of such sites to higher densities, applies to the subject site. We further confirm that the subject site is located close to a public transport corridor, which is addressed further below

In relation to 'public transport corridors', the Guidelines state:

‘Walking distances from public transport nodes (e.g. stations / halts / bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak hours) should also be taken into consideration in considering appropriate densities. In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes. Minimum densities should be specified in local area plans, and maximum (rather than minimum) parking standards should reflect proximity to public transport facilities.’ (our emphasis.)

It is noted that the Guidelines reference minimum densities 50 No. dwellings per ha and with the highest densities located at rail stations/bus stops. We further confirm that the subject site is located proximate to high quality public transport. For example, Dublin Bus Route Nos. 49, 65b and 75 are located within a short walking distance of the site on Firhouse Road and Ballycullen Road, offering services every c. 8 minutes. Additionally, substantial changes are

proposed to the bus services in the application site's vicinity. Bus Connect Routes F1 (Charlestown - Finglas Bypass - City Centre – Tallaght) and S6 (Tallaght - Dundrum - UCD – Blackrock) are proposed to operate with c. 150 metres of the proposed development and will offer peak frequencies of 10 and 15 minutes, respectively (Refer to the enclosed *Traffic and Transport Assessment (TTA)*, for further details on existing and proposed public transport within the vicinity of the site).

In relation to 'Inner suburban / infill' sites, the Guidelines state:

'The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure. Such development can be provided either by infill or by sub-division.'

- (i) *Infill residential development*
Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc. Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands.'

Having regard to the above criterion, we identify the subject lands as 'gap' site on the basis that it is located in a large suburban area within the Dublin Metropolitan Area, which is primarily characterised by low density suburban residential development. We submit it is possible to provide a medium to high density apartment scheme on this site which simultaneously protects the amenities of existing dwellings within the vicinity primarily as a result of the generous separation distances and transitional building heights. We, therefore, confirm that the above guideline, which promotes the redevelopment of such sites to higher densities, applies to the subject site. On this basis, having regard to the above criterion, we contend that the subject site is an appropriate location for increased residential density.

This submission demonstrates that the proposed development provides high quality, higher density development balanced with a carefully considered site layout, building design principles and landscaping strategy that ensures positive interaction with the existing context. As part of this, the proposed development responds sensitively to the character of the area and strikes an appropriate balance between the protection of the amenities and privacy of adjoining dwellings; the protection of protected views of the Dodder Valley and the Dublin

Mountains; the protection of established character of the area; and the need to provide residential infill development at an adequate density, particularly in serviced urban areas.

As highlighted in further detail throughout this Statement, the proposed development achieves a gross residential density of 217 units per hectare, thus making a significant contribution to national objectives surrounding compact growth, whilst respecting the amenity and privacy of nearby residences and providing a generous quantum of public open space (c. 1,347 sq m). It is further demonstrated in the *Architectural Design Statement*, prepared by OMP Architects, the *Verified Photomontages* booklet, prepared by Digital Dimensions, and the *Daylight & Sunlight Report*, prepared by OCSC Consulting Engineers, that the design of the development ensures compatibility with the surrounding context. In addition, the planning application is accompanied by CGIs which illustrate how the proposed development will be visible within the locality.

We, therefore, conclude that the development proposal accords with this national guidance and provides a sustainable urban residential development which optimises the delivery of housing on a well-located, infill, underutilised serviced site.

3.5 Urban Design Manual – A Best Practice Guide (2009)

The Urban Design Manual presents 12 No. criteria that should be used to facilitate assessment of planning applications and should therefore be used as a guide to steer best design practice for residential proposals. The points below illustrate how the 12 No. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted: i.e. not moving onto matters of detail until the important structural decisions have been taken.



Figure 3.4: Urban Design Criteria. (Source: Urban Design Manual, 2009; p. 9)

The 12 No. criteria are subdivided into three groups: Neighbourhood; Site; and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process.

In short, the proposal's response to the various criteria set out by the Guidelines is summarised as follows:

Context: How does the development respond to its surroundings?

Response:

- The subject site is currently developed with numerous one and two storey building, most of which lie vacant. Though the proposed development will form a mixed use scheme comprising apartment units, which is inherently different from what is currently on site, the design and layout of the scheme has been cognisant of its sensitive surroundings.
- The proposed development has been designed to positively respond to the surrounding established residential developments and includes commercial units, a childcare facility and publicly accessible open space along Firhouse Road and Mount Carmel Park road. We highlight that placemaking is fundamental to the success of higher density developments and further highlight that this is an important aspect of the creation of a new local centre in the Firhouse area.
- The proposed scheme is designed to include appropriate heights with set-back upper levels to ensure that the residential amenity of adjacent properties is maintained and respected. The development has been organised to maintain and enhance connectivity to the existing green spaces, maximising the publicly accessible open space, while providing communal amenity spaces centrally between each block and at roof levels.
- The buildings step up in height as they progress towards the corner of Firhouse Road and Mount Carmel Park. The surrounding area is predominantly comprised of 2-3 storey housing. Higher densities of living, along with an increased mix of uses, will be essential in facilitating the development to grow as a local centre and to create a sense of place within Firhouse.
- The subject site has a relatively gently sloping topography, falling from the existing site entrance off Firhouse Road down to the northern corner of the site at the junction of Mount Carmel Park and the existing wall to Dodder Valley Park.

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

Response:

- The design of the proposal provides an attractive street edge on an existing underutilised site which integrates with the existing pedestrian and cycle network

along Firhouse Road and Mount Carmel Park. Pedestrian friendly areas are promoted within the scheme through the provision of shared amenity and public open space.

- The application will provide a mix of uses at ground floor level which, in itself, will act as a local centre to be used by the local community and residents of the proposed development.
- The layout of the proposed scheme will not hinder upon any existing or proposed bus services. There is an existing bus stop which sits directly adjacent the subject site on Firhouse Road as well as additional bus stops along Ballycullen Road.
- The proposed density will help encourage the use of public transport both existing and proposed. It is envisaged that local capacity and access will be further enhanced over the coming years under the BusConnects programme which is now being implemented.

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

Response:

- The proposed development provides a mix of Studio, 1, 2 and 3 bedroom apartments units (incl. duplex units) which will cater to a range of tenures, to meet the needs and requirements of all sectors of the community. A proposal for the provision of Part V housing has been issued to the Local Authority for approval and a validation letter, agreeing to the principal of the proposed provision has been received and is enclosed.
- The design of the scheme also ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the Building Regulations. Accessible car parking provision is also provided in the development.
- High quality, useable and inclusive public open space is provided for at a strategic location adjacent to Firhouse Road, Ballycullen Road and Mount Carmel Park. The proposed scheme includes high quality residents' communal amenity space (incl. children's playground and equipment for older children) and private amenity spaces.
- The proposed public space at surface level includes a variety of seating and attractive landscaping which will create a welcoming streetscape and public realm. This space will also act as a breakout space for the various commercial units where people can relax and socialise. The public open space is not proposed to be taken in charge by the Local Authority and will be maintained by the appointed management company.
- The surrounding residential buildings will overlook the new public space whilst also allowing direct sunshine to cover large portions of the space during varying parts of the day. Pedestrian routes are provided within the site with finishes, lighting and slopes appropriate for users of all abilities. Seating is provided throughout the landscape proposals to allow users to rest and interact.

- The proposed apartment mix will expand the range of residential options in what is predominantly a suburban housing neighbourhood.

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

Response:

- The proposed development will incorporate the existing uses on the site (betting office and barber shop) and propose a range of new uses, including a childcare facility, café, office and medical unit, which will all contribute to the quality of life in its locality.
- The mix of non-residential uses as described above are located at ground floor and lower ground floor levels, directly accessible from Firhouse Road and Mount Carmel Park and will activate the street frontages.
- A mix of uses is required to facilitate the evolution of a vibrant and attractive urban environment. The facades onto the streets and the public space will aim to provide connectivity between the inside and outside and contain a range of functions that bring animation to the building frontages with passive surveillance of these spaces.
- The existing site is characterised by single and two storey buildings, surrounded by an area of large hardstanding car park and bounded by walls and security gate on its eastern edge. The proposal will open up the site through the provision of high quality public realm which is intrinsically linked to the Dodder Valley Park.

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

Response:

- The proposal will connect to, and make most efficient use of, existing services and infrastructure. As stated above, the scheme will have a gross residential density of 217 units per hectare. This is an efficient use of the underutilised urban lands and supports the NPF and RSES objectives to consolidate development in Dublin.
- The proposed landscape strategy proposes a sequence approach to the open spaces which have been designed and detailed to serve aesthetic and active landscape, biodiversity, natural SuDS and natural view screening functions.
- When planning the site, a number of site layout options were explored for the orientation of buildings and the routing of the public space through the site. As such, the aspect and orientation of the buildings, communal spaces and public spaces have been given great consideration in order to guarantee the south-westerly sunny natural light into the heart of the development.
- The existing buildings on site will not be retained as part of the proposed development. As stated previously, the existing uses will be integrated into the proposed scheme. At present, the site is underutilised, and the proposed

development will make the best use of serviced lands which are readily accessible by high-quality public transport and infrastructure.

- Recycling facilities are provided at ground level beneath Blocks 01 and 02, full details of which can be found in the *Operational Waste Management Plan (OWMP)*, prepared by OCSC Consulting Engineers, which accompanies this planning application.

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

Response:

- The proposed landscaping scheme will ensure that the proposal assimilates well into its surroundings, thus creating a sense of place. Furthermore, a quality design approach has been adopted to ensure that the scheme integrates into the surrounding context.
- The buildings have been placed in areas designed to maintain and enhance the existing amenity and privacy. The podium open space at the centre of the site provides an extensive green space with hard landscaping complemented with planting and SUDs features.
- Following analysis by the Conservation Architect, it was found that the existing structures on site are not deemed to be historically or architecturally significant and therefore the application proposes to carefully remove all buildings onsite. The rubble stone wall which comprises the northern and western boundaries of the site will be maintained and protected during the construction phases.
- The development has to create a strong sense of place and create a public space that works as a destination to attract pedestrians to the commercial uses at a newly established and improved, local centre. The proposal also includes opportunities for socialising and a place for people to meet, whilst respecting residential amenities and privacy.

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

Response:

- The proposed design sets out to prioritise the pedestrian and cyclist above the private car as a primary concept in so far as feasible. The layout of the buildings has ensured that existing routes within the vicinity are enhanced as part of the proposed development. Residents of the proposed development can avail of a new route through the site accessing public roads to the east and south.
- Provisions have been made to ensure that the scheme integrates with the existing, and soon to be improved, cycle routes along the perimeter of the site.

- Every opportunity has been taken to make all public street frontages active with 'own-door' residences fronting Mount Carmel Park Road or non-residential spaces provided at the majority of building frontages.
- A number of options were explored for the orientation of the residential buildings on the site in order to define a hierarchy of spaces that can have a variety of different functions for residential amenities whilst also allowing good solar access and providing passive surveillance over all spaces.

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

Response:

- The public space and the shared amenity spaces for the residents provide a variety of areas that are planned and designed to host a range of activities. The residential buildings will also bring additional life and animation to the area, increasing the footfall into and around the site.
- The enclosed architectural and landscaping drawings demonstrate the scale and functionality of each space plus the linkages between spaces and the passive surveillance over each space from the residential apartments. There is a clear definition between the public realm at ground level and the residents' communal space at podium level.
- Access control will be used to manage who can access the podium space. Podium level apartment terraces looking onto the residents' communal space will be provided with a appropriate boundary treatments to distinguish the different ownership.
- The resident's communal spaces benefit from excellent passive supervision from apartments at all locations. All of the children's play areas will also benefit from this passive supervision at all times. The public space and the surrounding streets also benefit from excellent passive surveillance.

Adaptability: How will the buildings cope with change?

Response:

- In terms of adaptability, apartment buildings are traditionally concrete column and slab construction, this allows all walls to be of lightweight construction and non-load bearing. This offers the opportunity to be able to modify apartments layouts if required or merge/split apartments at a future point in time if circumstances dictate. For example, two bedroom units could be converted to 2 No. studio units. Notwithstanding this, the current provision of studio, one, two and three bedroom apartments will cater for a range of users and over half of these apartments exceed the minimum standard areas by at least 10%.

- In terms of dealing with climate change, the residential buildings are designed to NZEB standards. Apartments will utilise air-source heat pump technology to ensure the apartments can be heated as efficiently as possible without producing unnecessary emissions which themselves would contribute to climate change. In addition, the heat pumps will be utilised to offset the energy demand with renewable energy.

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

Response:

- The quantity of residential communal amenity space exceeds the requirements of the standards as set out in Appendix 1 of the *Sustainable Urban Housing Design Standards for New Apartments (2020)*. External communal amenity space has been provided at podium level and at roof levels, which are naturally raised above the public space, providing clear separation between public and semi-private spaces. In terms of sunlight access to the communal open space, the *Daylight & Sunlight report* positively states the following:

'...In terms of sunlight access, excellent levels of sunlight are experienced across the proposed development. The communal amenity spaces provided exceed the BRE guidelines for sunlight on the test day of 21st of March.'

Further to this, all apartments have access to their own private balconies or terraces in accordance with the minimum requirements, as per the above referenced *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*.

- As the site is located in a suburban location, where good street frontages will be required in order to create a strong public realm, a balance between these design requirements and the need to provide dual aspect apartments must be met. On this basis, we note that the proposed development exceeds the SPPR 4 requirement for schemes in suburban or intermediate locations of 50%. All 3-bedroom apartments will be dual aspect as recommended by the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*.
- Further to this, the separation distances between the proposed buildings have been maximised insofar as possible. Where apartments have less than 22m separation, windows are located, sized and screened to give privacy to users of rooms in these apartments. Planting is provided to give a buffer zone between the private and semi-private amenity spaces at podium level.
- All apartments will be designed to meet Part E of the Technical Guidance Documents for acoustic sound transmission. All apartments are also designed to meet the storage requirements as set in Appendix 1 of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*, and importantly, all storage is contained within each individual apartment.

- Some storage of recyclable materials is allowed for within each apartment, but a regular transfer of materials will be required to centralised waste stores beneath the apartment block, as sized by OCSC Consulting Engineers.
- In terms of relationship with neighbouring existing development, all blocks have been positioned at appropriate distances from existing adjacent neighbouring properties and the external amenity spaces of those properties. The proposed buildings are also at reduced heights along the eastern boundary of the site in order to respect the privacy of adjacent properties and transition in scale to the existing low density housing.

Parking: How will the parking be secure and attractive?

Response:

- The proposed development aims to prioritise pedestrians and cyclists over the private vehicle.
- The development proposes 80 No. car parking spaces in total located at the basement car park beneath the blocks. No parking spaces are located at ground level.
- Given the proximity of the site to public transport, it is proposed to provide less than the Development Plan standards for the residential uses, in line with the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*.
- A detailed breakdown and summary of the parking provision has been provided in the enclosed TTA. It is submitted that the proposed provision is an appropriate balance between the Development Plan and national guidance for sustainable housing developments.

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

Response:

- The proposed development introduces a new building line along Firhouse Road and Mount Carmel Park creating a new edge condition to the development. Within the site, variations of brick type, detailing and proportions supplemented by complimentary materials allow the individual blocks to make reference to their character areas within the site, creating a distinct sense of identity at each building. The design of the public space is also highlighted as central to the design of the new local centre.
- A drawing is enclosed, prepared by OMP, which suggests areas of the site to be taken in charge by the Local Authority on completion of the project is enclosed. The material finishes in areas to be taken in charge will be reviewed and approved by them through standard procedure.

As evident throughout this section, the 12 No. key quality criteria for urban spaces have been fully considered and it has been demonstrated how the proposed scheme will provide a distinctive place in Firhouse.

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

These Guidelines seek to promote high density apartment development on residentially zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

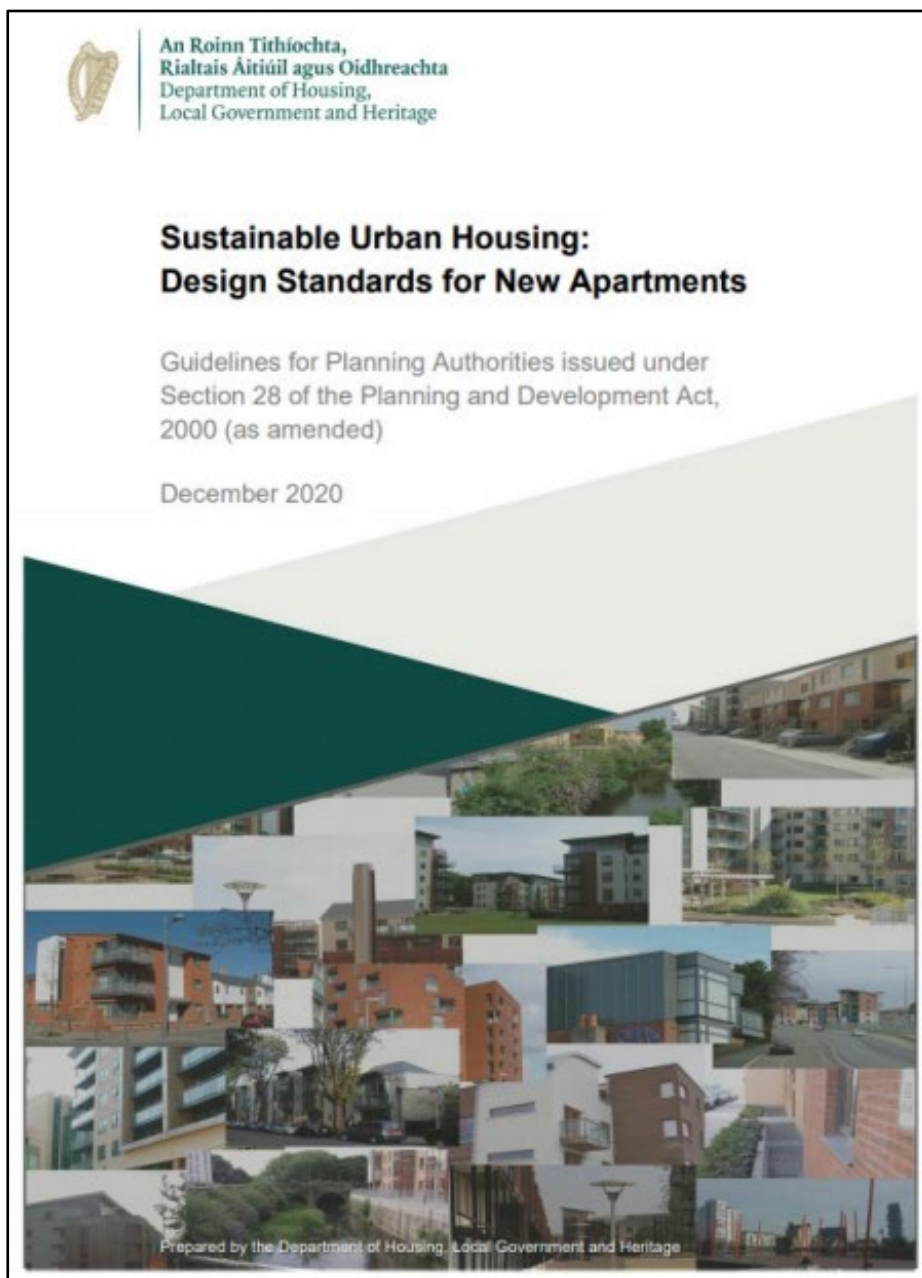


Figure 3.5: Cover of *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*.

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)* ('*Apartment Guidelines*') identifies three broad types of locations suitable for apartment development and advises that Planning Authorities should have regard to these proximity and accessibility considerations.

When applying the locational criteria set out within the Guidelines, the proposed development is considered to fall within the 'Intermediate Urban Locations' category, having regard to considerations below in Table 3.1. For such locations, the Guidelines state:

"Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net)..."

Comprising of 100 No. residential units, c. 355 sqm of non-residential floorspace and c. 1,347 sqm of public open space, the proposed development is considered to be a medium-scale development that predominantly provides apartments. In our view, the proposed development, from a scale perspective, is therefore appropriate for an 'Intermediate Urban Locations'.

Further to this, we have applied the 'Intermediate Urban Locations' locational criteria below to demonstrate the alignment of the application site with this category

Intermediate Urban Locations	
Criteria	Application Site
<p>Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions.</p>	<p>As existing, the application site is located approximately 1,400 metres from Knocklyn Shopping Centre. Tallaght Village and the surrounding area, a key employment location, is located approximately c. 2km (25 minute walking distance) of the site.</p> <p>There are also a number of schools in close proximity, namely, Scoil Carmel J.N.S, Gaelscoil Chnoc Liamhna and Tallaght Community School.</p> <p>Whilst approximately 2,900 metres from the site, TU Dublin Tallaght is within reasonable reach of the site and therefore considered relevant for the purposes of addressing this criterion and can be reached within 12 minutes on a bicycle. Tallaght Adult Education Service is also located approximately 2,000 metres from the site.</p>

	<p>We, therefore, conclude that the subject site is located in close proximity to multiple employment destinations and educational facilities. Furthermore, we confirm that all employment locations and educational institutes referred to above are accessible via sustainable modes of transport as addressed below.</p>
<p>Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided.</p>	<p>High-frequency urban bus routes will be provided as part of the BusConnects programme which will further enhance public transport within the area.</p> <p>BusConnects Orbital Route S6, for example, will run adjacent to the site on Firhouse Road, operating between Tallaght and Blackrock DART Station. This orbital route will enable access to numerous other bus routes, both radial and orbital, the Luas Red Line at Tallaght, and Luas Green Line at Dundrum.</p> <p>The F1 route will replace bus services operating on Ballycullen Road and will maintain direct access to Dublin City Centre. The F1 route will combine with routes F2 and F3 forming the F-spine, thus providing a high frequency bus service between Terenure Road West and Finglas via Dublin City Centre.</p> <p>The A3 will operate via the N81 to the north of the subject site and will combine with the A1 at Templeogue and the A2 and A4 at Terenure Road East to form the high frequency A-spine between Terenure Road East and Whitehall on the northside of Dublin, via Dublin City Centre. Routes D5, 82 and X47 (peak hour only route) will also operate via the N81 and provide alternative routes to Dublin City Centre.</p> <p>We therefore conclude that high frequency urban bus services can, and will be, provided within walking distance of the application site.</p>

<p>Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.</p>	<p>The application site is currently served by a number of bus routes serving stops located on Firhouse Road and Ballycullen Road namely the 49, 65b and 75, (all of which are located within c. 150m). Collectively, these routes offer a cumulative peak frequency of one bus every 8.5 minutes.</p> <p>Furthermore, the 54a and 77a routes operate on the N81 to the north of the site (c. 1000 metres) which can be accessed via pedestrian infrastructure through Dodder Valley Park.</p> <p>The high frequency route 15 (c. 1,200 metres) also operates on St. Colmcille’s Way (R113).</p>
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Table 3.1: Assessment of the application against the Intermediate Urban Locations Criteria contained within the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

As set out above, the locational characteristics of the application site aligns with the ‘Intermediate Urban Locations’ criteria. The defining locational characteristics of the subject site include its proximity to a number of high quality existing bus services, which will be vastly improved through the roll-out of BusConnects (high frequency urban bus service). The delivery of higher density apartment development at the application site is therefore considered to be appropriate. The proposed residential gross density of 217 No. units per hectare is considered to align with the broad guideline of ‘higher density development’.

The Guidelines also provide new apartment design standards that supersede Development Plan provisions in respect of the standards listed below. In this regard, the *Apartment Guidelines* (page 4) state the following:

‘These guidelines have been issued by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and An Bord Pleanála are required to have regard to the guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions.

Accordingly, where SPPRs are stated in this document, they 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.’ (our emphasis.)

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

The *Guidelines* also provide standards in respect of:

- Internal space standards, including storage spaces;
- Amenity spaces including balconies and patios; and
- Room dimensions.

Compliance with the above noted design provisions has been achieved in this development, full details in this regard are provided in the enclosed architectural *Technical Document* and *Housing Quality Assessment (HQA)*, prepared by OMP Architects.

Car Parking

Section 4.18 'Car Parking' of the *Apartment Guidelines* states:

'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.'

In terms of the proximity and accessibility criteria referred to above, the following locational categories are provided and reflect those detailed in respect of density: Central and/or Accessible Urban Locations; Intermediate Urban Locations; and Peripheral and/or Less Accessible Urban Locations.

As set out in detail above, we demonstrated that the subject site is an 'Intermediate Urban Locations'. For such locations, the *Apartment Guidelines* state:

'In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.' (Section 4.21)

The proposed development is a medium scale to higher density development. As further demonstrated above and throughout the submission, in our view, the subject site constitutes an 'Intermediate Urban Location'.

To accord with the *Apartment Guidelines* in respect of such locations, the policy requirement is for 'car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances'. It is our view that the proposed development complies with the *Apartment Guidelines* in this respect.

We note that Sections 4.23 to 4.26 of the Guidelines also provide further requirements applicable to the proposed development with reduced car parking. This includes the following:

'For all types of location, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off, service, visitor parking spaces and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking and secure storage. It is also a requirement to demonstrate specific measures that enable car parking provision to be reduced or avoided.'

As well as showing that a site is sufficiently well located in relation to employment, amenities and services, it is important that access to a car sharing club or other non-car based modes of transport are available and/or can be provided to meet the needs of residents, whether as part of the proposed development, or otherwise. 'Car free' development is permissible and if developed, must be fully communicated as part of subsequent apartment sales and marketing processes.

Where any underground car parking is proposed, such facilities must be well lit and adequately ventilated. Where surface parking is provided, it should be clearly accessible to the entrance to, and where appropriate, overlooked by, the units it serves. Car parking may be provided on-street at the edge(s) of a development site in some locations.

Decked or multi-storey car parking may also be considered, but should not be compromise the quality of amenity space, building design or streetscape. At least one principal façade of multi-storey car parks should be fronted by development, for example a south-facing elevation and such structures may also provide an opportunity for rooftop amenity space. In all cases, designated parking spaces for disabled drivers should be provided.'

We confirm that the characteristics of the proposed development enables car parking provision to be reduced at the subject site.

As part of this, we also confirm compliance with the above Sections of the *Apartment Guidelines*, having regard to the key points below:

- As previously demonstrated, the subject lands are located in close proximity to a number of bus stops, employment locations and educational facilities.
- The proposed development provides 4 No. drop off bays associated with the crèche, 1 No. loading (service) bays and 5% of the total car parking provision will be accessible spaces suitable for disabled users (in line with the Development Plan).
- The application submission is supported by a detailed *Framework Residential Travel Plan* (See Section 8 of the enclosed TTA which provides support measures to promote sustainable travel and a modal shift away from car dependency.
- The proposed development provides for a car sharing scheme, with 17 No. EV cars available for general public use and the residents of the scheme.
- The majority of the car parking is provided by way of underground parking. It is confirmed that the car park will be well-lit in line with Part M regulations.
- In terms of ventilation, we also confirm that the car parking areas are designed to meet the ventilation requirements set out in relevant Technical Guidance documents and associated Standards.

In conclusion, we confirm that the proposed development complies in full with the SPPR's and the various numerical standards contained within the *Apartment Guidelines*. Refer to the enclosed *Technical Document* and HQA, prepared by OMP Architects, for full details surrounding compliance in this regard.

3.7 Childcare Facilities Guidelines (2001)

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

The *Apartments Guidelines* note that 1-bed or studio type units should not generally be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

In this case, a residential development of 100 No. units is proposed; 50% of those units are 2-bed units or larger. The proposed development includes a crèche c. 114 sq m. The enclosed *Community and Social Infrastructure Audit*, prepared by Tom Phillips + Associates, has regard to the capacity within the existing local childcare network, notes that the potential childcare uptake of the proposal is likely to be only 51 No. places. Refer to Section 4.1 of the *Community and Social Infrastructure Audit* for further details.

In line with the Tusla (2018) *Quality and Regulatory Framework: Full Day Care Service and Part-Time Day Care Service* we confirm that the proposed childcare facility at c. 114 sq m can accommodate 26 No. children and approximately 2-3 No. members of staff.

We, therefore, confirm that the scale of the proposed childcare facility is adequate for the proposed development, having regard to the findings of the community and social infrastructure audit.

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

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

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

The Applicant has submitted information identifying the proposed Part V units, and related figures, to South Dublin County Council. We confirm that the proposed development is subject to the requirements of the Part V of the Planning and Development Act 2000 (as amended). A total of 20 No. units, as agreed with the Local Authority, will be provided as Part V units. A Validation Letter, received from the Housing Section of South Dublin County Council form is enclosed as an Appendix to the SHD planning application form.

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

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a designed approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

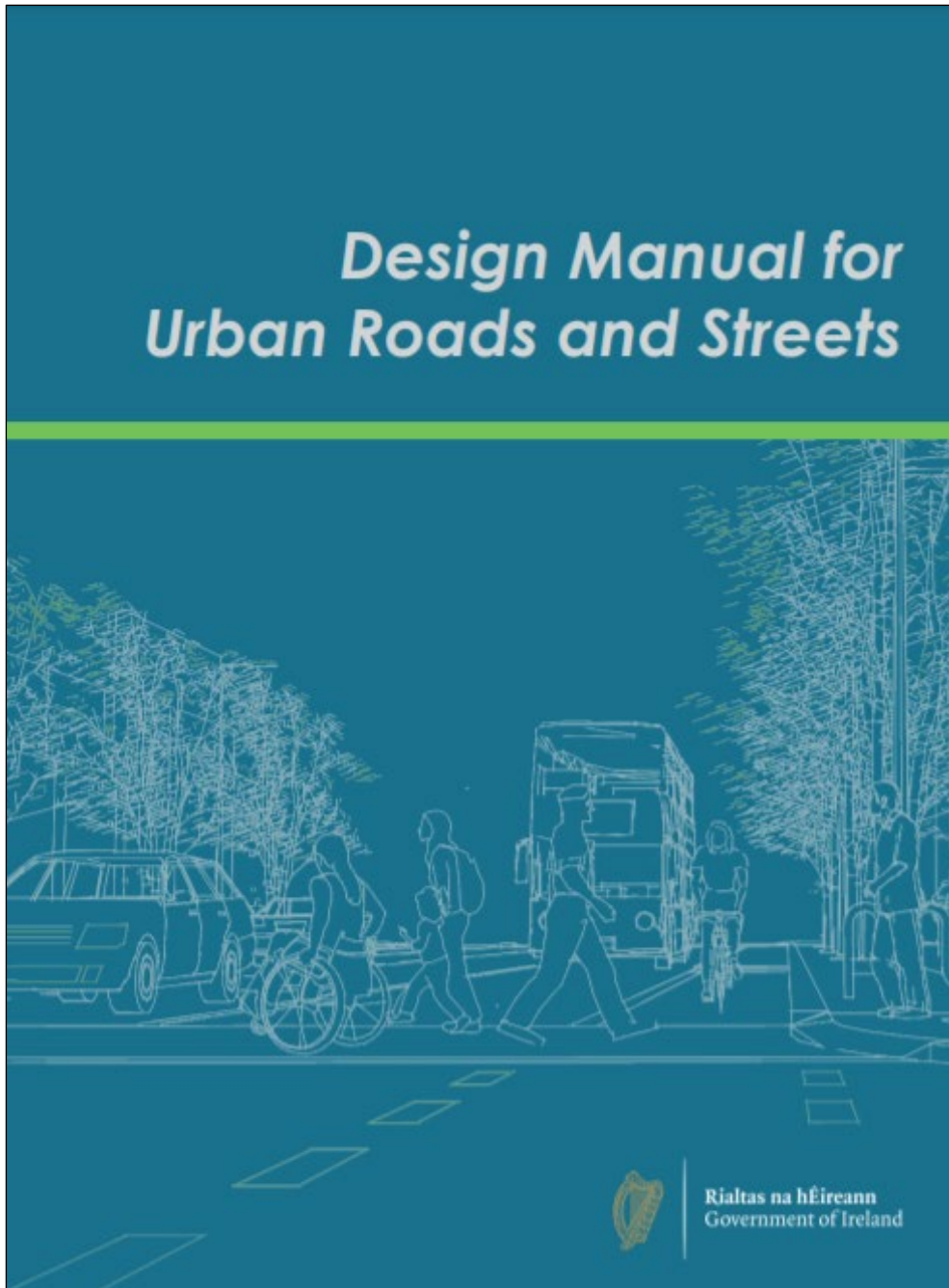


Figure 3.6: Cover of *Design Manual for Urban Roads and Streets* (2019).

A DMURS Compliance Statement forms part of the enclosed TTA and confirms the proposed development is consistent with the principles and guidance of DMURS.

3.10 *The Planning System and Flood Risk Management (2009)*

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009). These Guidelines introduce the principle of a risk-based sequential approach to managing flood risk.

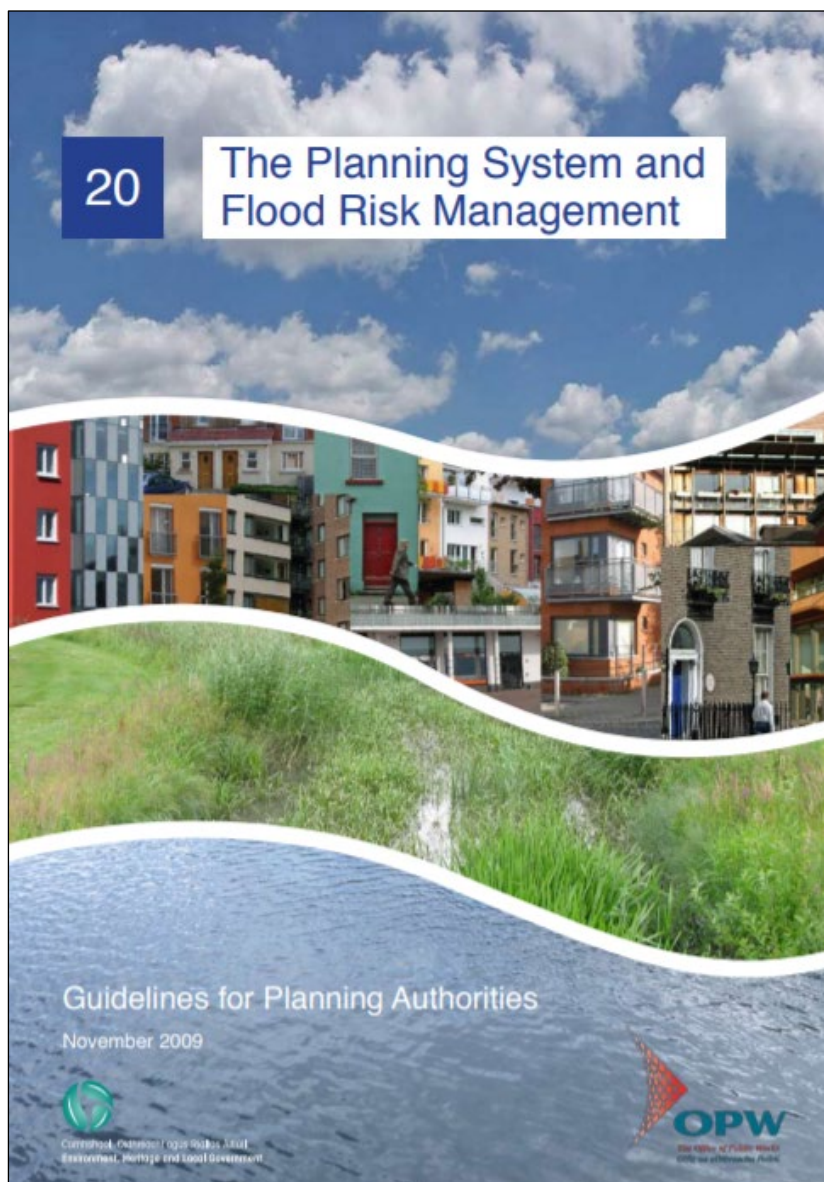


Figure 3.7: Cover of *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009).

A flood risk assessment has been undertaken by PHM Consulting and accompanies this submission (Refer to Section 7.0 of the enclosed *Water Services Report*). The Flood Risk Assessment (FRA) was prepared to comply with current planning legislation, in particular the recommendations of *The Planning System & Flood Risk Management - Guidelines for Planning Authorities*. The FRA finds that the site is located within Flood Zone C thus, the proposal is acceptable in principle.

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

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

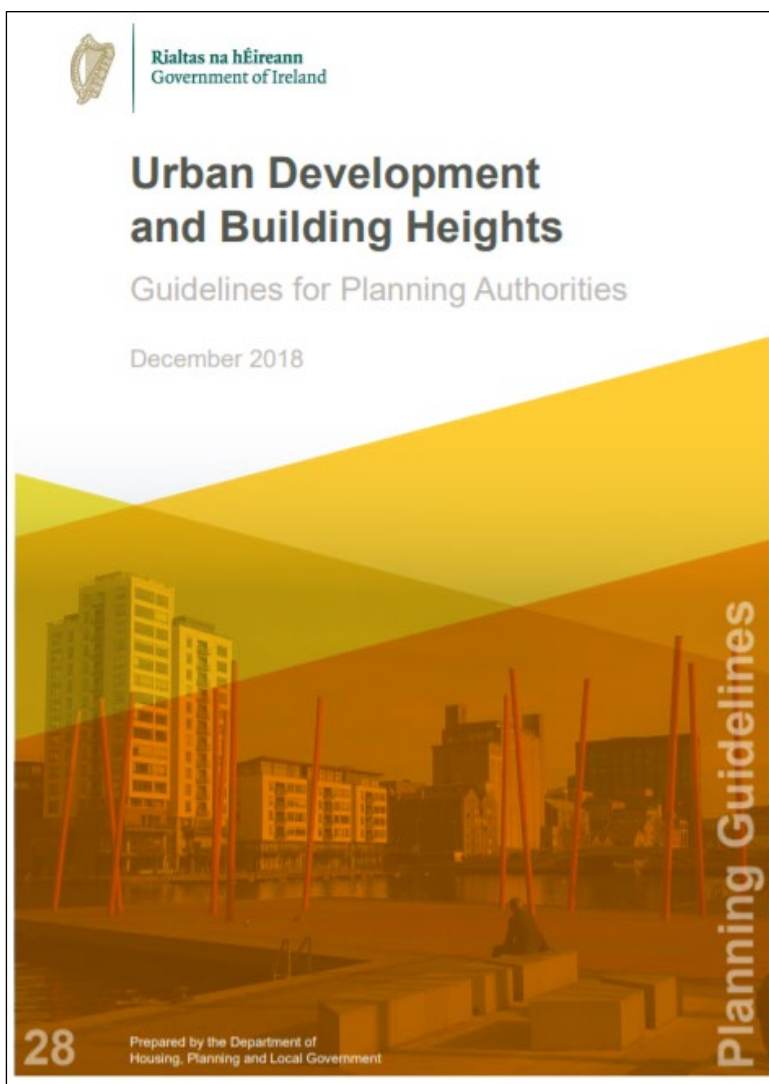


Figure 3.8: Cover of *Urban Development and Building Heights Guidelines for Planning Authorities (2018)*.

This further outlines how Local Authorities have set generic height limits within their functional areas, and state the following:

'...such limits have resulted from local-level concerns, like maintaining the character of an existing built-up area, for example. However, 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 *Height Guidelines* state that with regard to major towns which are identified for growth, it is appropriate to support heights of at least six storeys at street levels with scope for greater height subject to design parameters.

It is stated that the *Height Guidelines*, and the included specific planning policy requirements (SPPRs), shall take precedence over any conflicting policies and objectives within existing statutory planning documents (e.g. Development Plans, Local Area Plans and Strategic Development zones).

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

‘It is a specific planning policy requirement that where;

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

The criteria referred to by Policy SPPR 3 is contained in Section 3.2. It sets out a number of criteria which, in line with SPPR 3, should be satisfied in terms of proposals for greater height. The criteria are set out in the table below:

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

Scale	Criteria	Response
City / Town	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	<p>The proposed development site is served by a number of bus routes serving stops located on Firhouse Road and Ballycullen Road, namely the 49, 65b and 75. Furthermore, the 54a and 77a routes operate on the N81 to the north of the site which can be accessed via pedestrian and cycle infrastructure through Dodder Valley Park and under the M50 junction to the northeast of the site. The high frequency route 15 also operates on the St. Colmcille’s Way (R113) to the south of the site.</p> <p>High frequency urban bus routes will be provided as part of the BusConnects programme which will further enhance public transport within the area providing bus services at 10-15 minute intervals. Evidence of public transport capacity can be found in the TTA which</p>

		<p>is enclosed with this planning application.</p> <p>The TTA further outlines that it is estimated that 270 No. persons may occupy the residential portion of the site. It is assumed that each resident will generate 1.87 trips per day, equating to a total daily production of ca. 505 No. trips. Of the 505 No. daily trips, 21% are assumed to travel by public transport, equating, to c. 106 no. public transport trips per day. The capacity of bus services, namely the Nos. 49, 65B and 75, within the immediate vicinity of the site i.e. <150 metres have been calculated.</p> <p>The number of resident trips undertaken by public transport in the direction of demand has been calculated by Transport Insights (See Tables 8.2 and 8.3 of the TTA). Based on detailed calculations, Transport Insights are of the opinion that the current public transport capacity is sufficient to accommodate the small additional demand generated by the proposed development.</p>
	<p>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>	<p>The proposed development includes 2 No. buildings on a c. 0.46 ha site ranging in height from 3 and 5 storeys. The design strategy locates lower heights around the edge of the site (3 storeys with setback 4 storey) in closest proximity to existing residential properties in order to minimise potential impacts on the residential amenities of these properties in relation to overlooking, daylight and sunlight impact, overshadowing and overbearing.</p> <p>The topography of the site has also been used, where possible, to minimise visual impact yet deliver buildings to an appropriate height and scale. It is considered that this approach successfully integrates the new development into the area and whilst</p>

		<p>clearly comprising a new and higher density form of development than the prevailing two storey housing, it will not give rise to significant amenity or visual impacts as evidenced by the enclosed <i>Visual Impact Assessment (VIA)</i>, prepared by Landscape Architect David O’Sullivan M. Ag. Sc. (HORT), M.L.A., MLI of Doyle + O’Troithigh Landscape Architecture and the enclosed <i>Daylight & Sunlight Report</i> prepared by OCSC Consulting Engineers.</p> <p>The proposed public open space and enhancements to the public realm will provide a new positive interface between the subject lands and Firhouse Road/Mount Carmel Park at this location, which will replace extensive hardstanding surface car parking. The permeability will be enhanced at this location.</p> <p>The planning application is supported by an <i>Archaeological Impact Assessment and Method Statement</i>, prepared by AHC Ltd. The report notes that the proposed development area falls within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places. However, as the site is recorded as ‘House - 18th/19th century’ on the Sites and Monuments Record, the possibility of any physical elements of the RMP site extending into the proposed development area are negligible. It is the opinion of the Archaeologist that any impacts on Sally Park house are deemed to be indirect, in the form of impacts on the visual amenity. It is further noted in the report that the proposed development will not be visible from the grounds on the south side of the house. It is noted that the development will be visible from the north side of the house, however as this is the rear of Sally Park, with the main façade, south facing, any</p>
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		<p>impacts on the house are deemed only slightly negative.</p>
	<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to placemaking, 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>Notwithstanding that the site is small infill in nature, the proposed development is designed to include new spaces and pedestrian/cyclist routes which serve to create a more animated streetscape on a corner site. The scheme will deliver a gross density of 217 No. units per hectare through the provision of a range of architectural styles and contrasting scales within the development.</p> <p>As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights (lower along the eastern edges) and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties.</p> <p>As discussed previously, the proposed scheme includes a series of landscaping measures that will ensure a long term positive impact in areas, in particular, to the Firhouse Road.</p>
<p>District / Neighbourhood / Street</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 proposal will inherently improve the existing streetscape through the provision of public open space and significant public realm improvements as well as introducing active street frontages. The landscape strategy for the lands will enhance the connections to the Dodder Valley Park and promote the provision of pedestrian and cycle routes through the site.</p> <p>In terms of improving permeability and connectivity, the site's primary interface with the surrounding road network is onto Firhouse Road and proposes the removal of the boundary wall along Mount Carmel Park in order to open up the site and facilitate public interaction between the development and the adjoining roadway. This also</p>

		<p>facilitates permeability through the site and provides a new urban edge and contemporary streetscape.</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>The subject development comprises 2 No. buildings which are of varying scale, form and height. There are no <i>'uninterrupted walls of building in the form of slab blocks'</i>.</p> <p>A simple palette of materials, the use of setbacks at roof levels and the introduction of a variety of balcony types provide appropriate visual variety to the elevations and the massing of the buildings.</p> <p>The design will also activate the street frontage along Mount Carmel Park which currently defined by a render wall and gateway. All details regarding the material and elevation treatment is contained within the enclosed Architectural Design Statement which is submitted as part of this planning application.</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>Regarding flood risk, the site was subject to a flood risk assessment in line with the requirements of <i>"The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)</i>, which concluded that the site will not be subject to flood risk due to it being in Flood Zone C and is therefore appropriate for residential development (refer to the Water Service Report submitted with this planning application which includes a flood risk assessment).</p> <p>The proposed development will deliver an area of new public open space that is fully accessible to public transport. The creation of this space and the incorporated setback distances between the proposed development and existing neighbouring properties enables building ranges between 3 and 5 storeys to be established on the site.</p>

	<p>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.</p>	<p>The proposed development, which will introduce a new residential development together with commercial uses will be a new destination for the future occupiers of the development and the existing community. The proposal includes a number of new pedestrian and cyclist access points which enable connection into the existing road and street network.</p> <p>The proposal will provide for increased movement and fluidity of pedestrians and cyclists from Firhouse Road up through Mount Carmel Park and into the Dodder Valley Park and will act as a meeting point for social activities. The proposed public open space will also enhance the green infrastructure network in the local area.</p>
	<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposed development will deliver a good range of uses including residential, crèche, café, office, medical unit, barber shop and a betting office. These uses will all contribute to the limited services available to the existing area.</p> <p>The proposal will deliver a range of residential unit types that will serve a wide range of household types. The unit mix will include Studio, 1, 2 and 3 bedroom apartments in a neighbourhood predominately defined by low density, two storey detached and semi-detached houses. We also note that units have been designed to cater for the possibility of future conversion into age-appropriate living. This unit mix will ensure that a variety of unit types.</p>
<p>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</p>	<p>The development is designed to ensure that there will be no significant overshadowing or loss of daylight or sunlight to adjoining residential properties. Building heights, particularly those adjacent to housing within Mount Carmel Park, have been</p>

	<p>overshadowing and loss of light.</p>	<p>designed to minimise impact on access to sunlight or daylight on these properties. The enclosed <i>Daylight & Sunlight Report</i>, prepared by OCSC Consulting Engineers, provides further details in this regard. Furthermore, the development has also been designed to maximise daylight and sunlight access to the proposed residential units and amenity spaces within the development.</p> <p>The enclosed <i>Energy & Sustainability Report</i>, prepared by OCSC Consulting Engineers, provides further details of the overall positive performance of the proposed development in this regard.</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>As set out in detail in the enclosed Daylight & Sunlight Report, the proposed development is assessed having regard to the BRE ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’, which confirms that daylight and sunlight assessment undertaken accords in full with the methodology set out in the above referenced guidance.</p> <p>Further to this, a sample of the proposed units have also been assessed in line with the new European Standard on daylight – ‘EN 17037:2018 Daylight in buildings’</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</p>	<p>As noted above, the daylight, sunlight and overshadowing assessments demonstrate an excellent level of compliance with the target values set out in the BRE Guidelines.</p>

	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.	
Specific Assessments	Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such microclimatic effects and, where appropriate, shall include an assessment of the cumulative microclimatic effects where taller buildings are clustered.	<p>As the proposed development is of moderate scale and height, up to 5 storeys, and will not result or contribute to a cluster of tall buildings, it is not considered that micro-climatic impacts will arise.</p> <p>The design strategy and landscaping proposals at roof and podium levels will ensure all amenity areas are fully useable throughout the year.</p> <p>Additionally, the enclosed <i>Daylight & Sunlight Report</i> demonstrates that all outdoor amenity spaces have been afforded excellent levels of sunlight throughout the day throughout the year and the pedestrian environment, from a sunlight perspective, will be comfortable.</p>
	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.	<p>Bird surveys and bat surveys were carried out by Flynn Furney Environmental Consultants as part of the application process at optimal times of the year.</p> <p>In terms of bats, the survey found no bats or evidence of bat presence was noted in the Firhouse Inn building and the two adjacent buildings. The Bat Survey Report submitted as part of this planning application recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the habitats around the development are not impacted by light overspill. OCSC Consulting Engineer have prepared the site light specifications in consultation with the Environmental Consultant.</p>

		<p>No birds were observed entering or exiting any of the buildings at the former Firhouse Inn and the adjacent buildings. No nesting activity was observed in any of the areas within the grounds of these premises. A number of bird species were seen and heard overflying the site and alighting in the mature trees adjoining the site.</p> <p>Due to the modest height of the proposed development (max. 20.5 m) it is our opinion flight lines of birds will not be negatively impacted.</p>
	An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	There are no telecommunication channels currently traversing the subject site therefore none will be affected due to the proposed development of this proposal.
	An assessment that the proposal maintains safe air navigation.	An Aeronautical Assessment is not considered necessary as the maximum height of the proposed scheme is 5 storeys and the site is a considerable distance from the airport.
	An urban design statement including, as appropriate, impact on the historic built environment.	<p>An <i>Architectural Design Statement</i> has been prepared by OMP Architects and details the design rationale for the proposal.</p> <p>Mesh Conservation Architects have also prepared a <i>Heritage Impact Assessment</i> report which is enclosed with this planning application.</p>
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	<p>An EIA screening was undertaken by AWN Consulting and a report is enclosed with this planning application.</p> <p>A screening for appropriate assessment and ecological impact assessment was undertaken by Flynn Furney Environmental Consultants in respect of the proposal and full detailed reports are also enclosed with this planning application.</p>

		This <i>Statement of Consistency</i> demonstrates that the proposed development is broadly consistent with the <i>South Dublin County Council Development Plan 2016-2022</i> (and the <i>Draft South Dublin County Development Plan 2022-2028</i>), which are both subject to SEA. Overall, the proposed development is line with the objectives of the development plan and the land use zoning, therefore a SEA is not required in our opinion.
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Referring back to the aforementioned Guidelines in relation to sustainable urban development and apartment development, there is a suite of national planning policy that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the absence of finite land supply, increased building height is an essential component of achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities.

In this context, the *Height Guidelines* provide a mechanism through which building heights (and therefore densities), higher than those that may be permissible under the Development Plan, can be permitted.

The proposed development, including 2 No. blocks ranging between 3 to 5 storeys, complies with the Guidelines, as demonstrated by the full suite of site-specific assessment enclosed with this submission. The proposed development provides for an appropriate residential density and has been designed to provide a good level of residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents

3.12 *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*

The *Appropriate Assessment Guidance* was published to guide compliance with the Birds Directive, 1979 and the Habitats Directive, 1992.

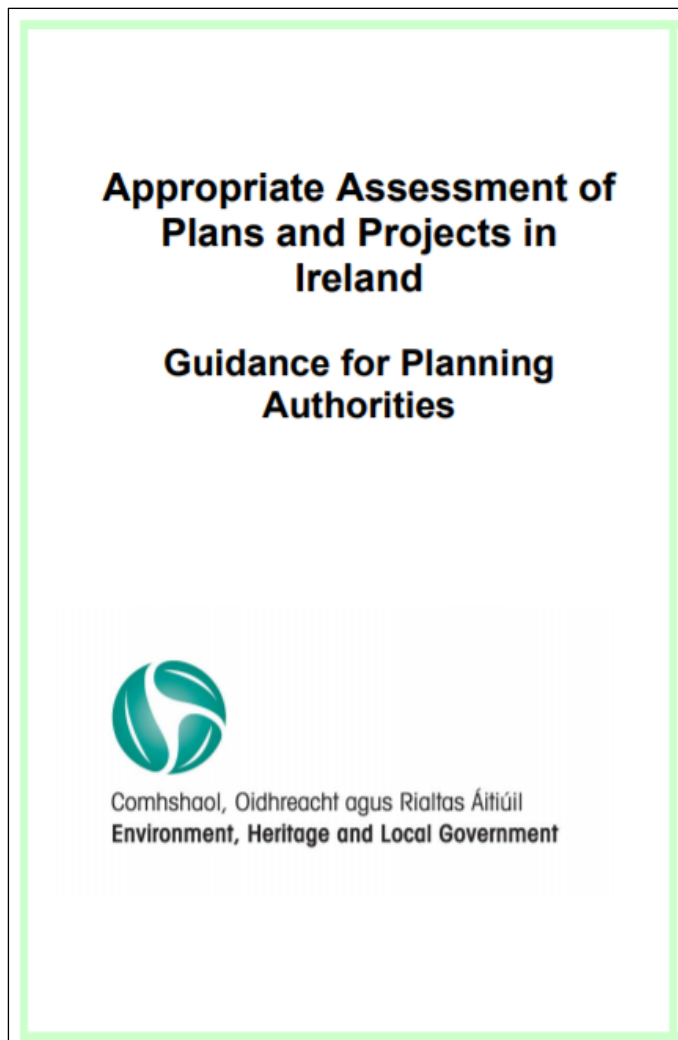


Figure 3.9: Cover of *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*

A *Screening for Appropriate Assessment* report, prepared by Flynn Furney Environmental Consultants, is enclosed. The report establishes that none of the habitats and species listed as ‘qualifying features’ in the Natura 2000 site designations in proximity to the subject lands will be affected by the proposed development and it has been assessed that the development of the project will ‘not result in any likely significant effects on Natura 2000 sites.

The report concludes that there will be no risk of significant negative effects on any Natura 2000 site, as a result of the proposed development, either alone or in combination with other plans or projects, and therefore, Stage 2 of the Appropriate Assessment Process – a Natura Impact Statement – is not required.

On the basis of the content of the enclosed report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

3.13 Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland was launched in 2016 with the aim of addressing ongoing supply issues for residential accommodation in Ireland. The overarching aim of the Action Plan is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.



Figure 3.10: Cover of *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021.

The importance of land supply and location is a central consideration of the Action Plan which states that:

'Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.'

The proposed development, which includes 20 No. social and affordable housing units, is located on zoned, serviced lands within walking distance of a range of amenities and services and will deliver 100 No. units in the coming years. The development is proximate to existing residential areas and employment opportunities, which is in line with the provisions of the Action Plan.

4.0 LOCAL POLICY

4.1 Introduction

This Section of the planning report provides an account of the relevant local planning policy framework pertaining to the site.

4.2 South County Council Development Plan 2016 – 2022

The *South County Council Development Plan 2016 – 2022* (herein referred to as ‘*Development Plan*’), which was adopted by the Local Authority on 12th June 2016, is the statutory plan for the area, at the time of writing, and will guide all development relating to the subject lands until the new Development Plan is adopted (i.e. *South Dublin County Development Plan 2022 – 2028*).

4.2.1 Core Strategy

The Core Strategy, which forms part of the *Development Plan* (contained within Section 1.0) articulates a medium-to longer term quantitative based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a *Development Plan* and its policies and objectives are entirely consistent with National and Regional development objectives set out in the *National Planning Framework (2018)* and the *Regional Spatial Economic Strategy (2019)*¹.

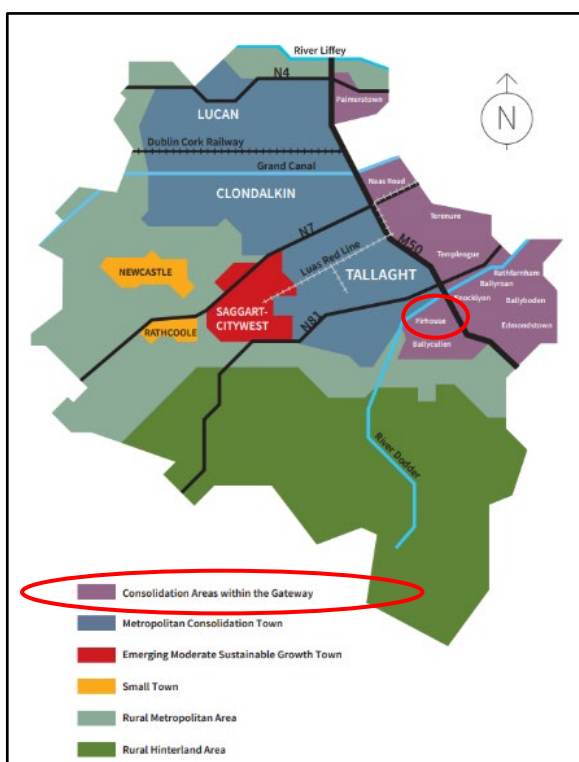


Figure 4.1: Core Strategy Map showing the indicative location of the subject site (circled in red) in ‘Consolidation Areas within the Gateway’. (source: *Development Plan* p. 10, cropped and annotated by TPA, 2022.)

¹ Variation No. 4 of the Development Plan responded to the publication of the National Planning Framework (NPF) in 2018 and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in 2019.

Firhouse sits within ‘Dublin City and Suburbs Including Key Metropolitan Consolidation Areas’ in the South Dublin Hierarchy, alongside Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown Knocklyon, Ballycullen and parts of Greenhills, Terenure and Rathfarnham.

Hierarchy	Description	Locations	South Dublin
Dublin City and Suburbs including Key Metropolitan Consolidation Areas	Considered necessary to address the established inner suburbs. Opportunities to strengthen and consolidate through infill and brownfield redevelopment	Not defined by RSES. Figure 1.1 refers	Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown Knocklyon, Firhouse , Ballycullen and parts of Greenhills, Terenure and Rathfarnham.

Table 4.1: South Dublin Settlement Hierarchy under the Regional Spatial Economic Strategy as per Table 1.2 of the *Development Plan* (Variation No. 4), collated by TPA, 2022.

In relation to ‘Dublin City and Suburbs Including Key Metropolitan Consolidation Areas’, the *Development Plan* states the following:

*‘The settlements of Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Knocklyon, **Firhouse**, Ballycullen and parts of Greenhills, Walkinstown, Terenure and Rathfarnham have been identified as Consolidation Areas within the Dublin City and Suburbs including Key Metropolitan Consolidation Areas. These established areas are located to the east of the M50 and south of the River Dodder. They are suburban areas with established identities and communities with distinct heritage and character. **These areas have a range of urban services such as transport, retail, medical and community facilities.** Recent Census data identifies an aging population and stagnant or falling populations, which presents a serious risk for the viability of services and facilities into the future.*

*A key element of the overall Settlement Strategy is **to promote the consolidation and sustainable intensification of the existing urban/suburban built form to the east of the M50 and south of the River Dodder, thereby maximising efficiencies from established physical and social infrastructure.**’ (our emphasis.)*

Table 1.4 of the *Development Plan* sets a high range population target of 314,000 persons up to 2026 (3,523.3 persons per year) for the Dublin Region and South County Dublin. The projected population to 2022 will equate to 299,907 persons. The *Development Plan* also outlines that there is overall housing unit requirement of 105,974 units or a growth of 7,587 units over the lifetime of the Plan. It is further predicted that household sizes will decrease from an average of 2.94 persons in 2016 to 2.5 persons by 2040.

It further notes that as of September 2019, 2,804 No. residential units have been delivered since the adoption of the plan, therefore there is sufficient capacity for further growth over the remaining lifecycle of the plan period.

Table 1.5 of the *Development Plan* details the total housing capacity for the duration of the Plan, with the proportion of overall capacity to be accommodated at each tier in the settlement hierarchy and the projected population for each settlement.

HIERARCHY	TOTAL LAND CAPACITY (HA)	TOTAL HOUSING CAPACITY (NO.S)	% TOTAL IN EACH SETTLEMENT	2011 POP	POTENTIAL POP (2011 & FORECAST 2022)	INFRASTRUCTURE COMMENT
Dublin City and Suburbs including Key Metropolitan Consolidation Areas						
Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown, Knocklyon, Firhouse , Ballycullen and parts of Greenhills, Terenure and Rathfarnham	473	9,620	24%	89,752	95,854	No significant road, water supply or drainage constraints. Proposed high capacity transport projects (BRT) would increase capacity of zoned lands.

Figure 4.1: Extract from Table 1.5 of the *Development Plan* ‘Total Capacity 2016-2022 County Development Plan’, cropped and annotated by TPA, 2022.

One of the primary objectives of the Core Strategy is ‘*to promote and support high quality infill development.*’

The proposed development, providing 100 No. residential units accords, in full, with the stated objective of meeting the County’s projected housing needs.

4.2.2 Land Zoning

The site is zoned zoning ‘LC - Local Centres’, with the land use zoning objective ‘*to protect, improve and provide for the future development of Local Centres*’.

In regard to ‘Local Centres’, the *Development Plan* states:

‘Local Centres are commercial centres that provide day to day services and facilities to cater for a local catchment. The scale and function of local centres vary. A Local Centre Zoning Objective is applied to these areas.’

Table 11.9 of the *Development Plan* outlines ‘Residential’ as being ‘Permitted in Principle’.

The non-residential uses proposed as part of the development include: Café (‘*Restaurant/Café*’), Medical (‘*Doctor/Dentist*’), Office (‘*Offices less than 100 sq.m*’), Bookmakers (‘*Betting Office*’), Barber Shop (‘*Shop – Neighbourhood*’) and a Creche (‘*Childcare Facilities*’).

Each of these uses are 'Permitted in Principle' under the zoning objective.

The southern area of the application site is unzoned and will be reserved for public open space and to gain access to the site, as previously agreed with South Dublin County Council (refer to enclosed Letter of Consent and accompanying drawing).

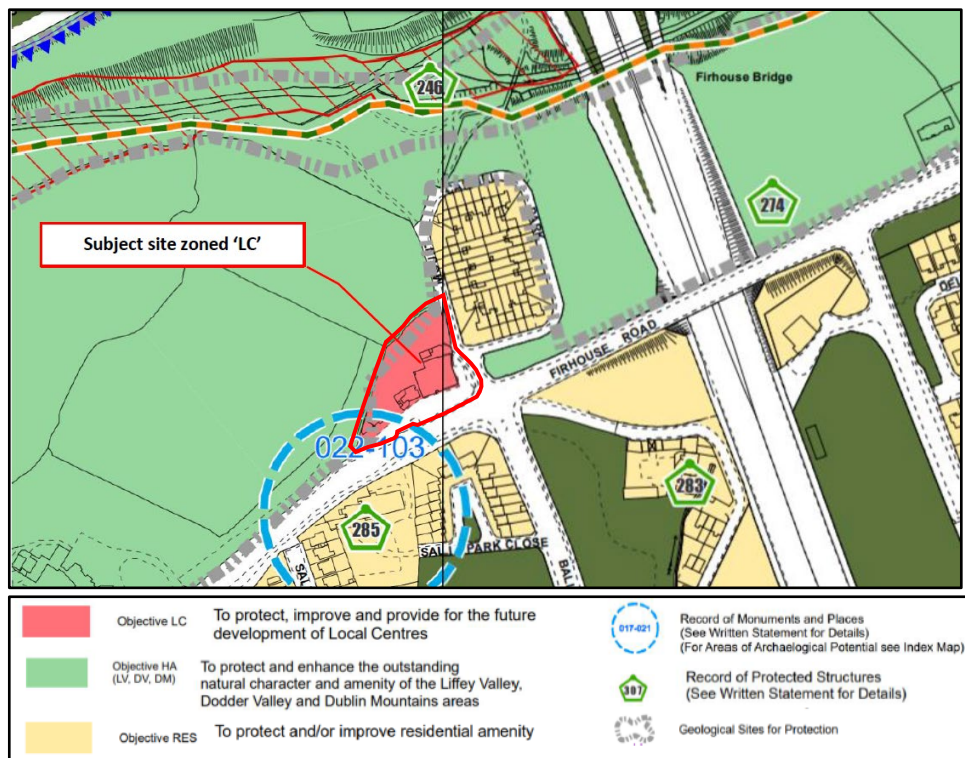


Figure 4.2: Extract from the Land Use Zoning Map showing the subject site in the context of the surrounding land use zonings. (Source: *Development Plan, Zoning Map 9 and Map 10, cropped and annotated by TPA, 2022.*)

The site is generally bounded by 'High Amenity' zoned lands to the west and north, with existing residentially zoned land to the east, southeast and south.

The strategic housing development, inclusive of 100 No. residential units and c. 355 sq m of the above listed non-residential uses, accords with land use zoning objective LC - 'to protect, improve and provide for the future development of Local Centres'.

Additionally, Section 5.1.4 of the *Development Plan* provides information surrounding the policy requirements for those lands subject to the 'Local Centre' objective.

In the first instance, it states:

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

In our opinion, the proposed development fully complies with the policy requirements relating to the local centres. The application seeks to deliver a high-quality mixed-use scheme comprising a vibrant mix of non-residential uses at ground floor level with residential above. Quality urban design was central to the overall vision for the site, as noted by An Bord Pleanála and South Dublin County Council during pre-application discussions.

We contend the proposed development balances the requirements arising from the ‘LC – Local Centre’ zoning designation of the land, and the need to provide a sustainable urban mixed use, primarily residential, development which optimises the delivery of housing on a well-located, brownfield, underutilised and serviced site.

Proposed Development will Protect and Improve Residential Amenity in the Area

The Design Team have designed the development to take into account the residential amenities of the area as well as those of the proposed development. The various assessments enclosed demonstrate that the proposal will complement the surrounding land uses and contribute to the development of a vibrant residential community and local centre in this established suburban area.

The proposed development also incorporates generous communal and private open space for residents, including high quality open space for use by the general public. Appropriate separation distances between buildings are incorporated throughout and there will be no overlooking or overbearing impacts on the adjoining residential properties or within the development.

We submit, at present, that a large amount of the lands of the subject site are underutilised and/or vacant. This is not a sustainable use of the lands acknowledging the current housing crisis and contravenes the national policy to provide additional housing in existing built-up urban areas in close proximity to public transport.

In summary, the proposed development fully conforms with the site’s land use zoning, ‘Local Centre’.

4.2.4 Compliance with Policies of the *South Dublin County Council Development Plan 2016-2022*

We submit that the proposed development is consistent with the policies and objectives of the *Development Plan* with regard to the following:

Table 4.2: Policy objectives in the *Development Plan* that are applicable to the subject application including responses as required (collated by TPA, 2022.)

Chapter 2 - Housing	
<p>Policy H1 Objective 2 Part V 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</p>	<p>The Applicant has engaged in consultation with the Housing Section of South Dublin County Council (‘SDCC’) and has reached agreement on the Part V proposals outlined. The proposed development will provide for 20% social housing as set out in the Part V documentation accompanying this planning</p>

<p>uses (save where the development qualifies for a modified or amended obligation or is otherwise exempted).</p>	<p>application submission, in accordance with the Council’s Housing Strategy and as is required under Part V of the <i>Planning and Development Act, 2000</i> (as amended).</p> <p>The preliminary agreement is for the transfer of 20 No. units. This meets the 10% requirement and the Applicant intends to hold further discussions with the Local Authority in this regard.</p> <p>The Applicant agrees to accept a condition attaching to a grant of planning permission, if An Bord Pleanála is minded to approve the proposed development, which requires the Applicant to enter into a Part V agreement with the Local Authority as per their requirements, prior to the commencement of development. All details relating to Part V are enclosed with this application.</p>
<p>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.</p>	<p>The proposed development provides a mix of dwelling types including Studio, 1, 2 and 3 bedroom apartments that will accommodate a variety of tenures.</p>
<p>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.</p>	<p>As discussed, an initial Part V proposal in accordance with the Planning Act and Regulations is enclosed with this application.</p> <p>The proposed development also comprises a mix of apartment types and are suitable young and older people.</p>
<p>H1 Objective 8 To ensure an adequate provision of social housing across the County through the facilitation of the transfer of lands and other appropriate mechanisms with third parties to ensure an appropriate distribution of</p>	

<p>new social housing, and to avoid additional concentration of social housing above that already in existence</p>	
<p>H3 Objective 1 To ensure an adequate provision of social housing across the County through the facilitation of the transfer of lands and other appropriate mechanisms with third parties to ensure an appropriate distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</p>	
<p>HOUSING (H) Policy 6 Sustainable Communities It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.</p>	<p>The application is designed in accordance with government policy, particularly the Section 28 Ministerial Guidelines as assessed above.</p>
<p>H7 Objectives 1 To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p>	<p>The proposed scheme 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>. Details of design compliance are contained within the <i>Architectural Design Statement</i> and <i>Housing Quality Assessment (HQA)</i>, prepared by OMP Architects. Please also refer to the DMURS Compliance Statement, contained Section 6.0 of the TTA.</p>
<p>H7 Objectives 2 To ensure that residential development provides an integrated and balanced approach to movement, place-making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</p>	<p>The design and quality of the public realm has been carefully considered by the Design Team given the land use zoning objective of the site as ‘Local Centre’, the feedback from An Bord Pleanála and the Local Authority at pre-planning stages, the prominent location of the site at the junction of Firhouse Road, Ballycullen Road and Mount Carmel Park and</p>

<p>H7 Objectives 3 To support public realm improvements as part of infill development.</p>	<p>the proximity of the site to the Dodder Valley Park.</p>
<p>HOUSING (H) Policy 8 Residential Densities It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.</p>	<p>The proposed development is at a gross density of 217 units per hectares which is considered a sustainable density for this location having regard to the site's location within Dublin's Metropolitan Consolidation Area, the requirements of the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)</i> and the <i>Sustainable Urban Housing: Design Standards for New Apartments (2020)</i>, as previously addressed above.</p>
<p>H8 Objective 1 To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).</p>	<p>The residential density is considered appropriate with regard to the proximity of the site to public transport links (see the enclosed TTA) and a multitude of services and facilities located within Firhouse and nearby Tallaght and Knocklyn (see the enclosed <i>Community and Social Infrastructure Audit</i>).</p>
<p>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).</p>	<p>Recent national policy guidance emphasises the importance of higher density developments at such strategic locations, therefore the proposed development is compliant with National Planning Policy.</p>
<p>HOUSING (H) Policy 9 Residential Building Heights It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County.</p>	<p>The proposed scheme includes a mix of uses and provides a range of building forms and building heights ranging from 3 to 5 storeys in height over lower ground floor and basement level.</p>
<p>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.</p>	<p>It is also noted that Policy 9 Objective 3 seeks <i>to ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity</i></p>

<p>H9 Objective 2 To ensure that higher buildings in established areas respect the surrounding context.</p>	<p><i>to existing housing (see also Section 11.2.7 Building Height).'</i></p>
<p>H9 Objective 3 To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).</p>	<p>Section 11.2.7 of the <i>Development Plan</i> sets out that the appropriate maximum or minimum height of any building will be determined by factors such as the prevailing building height in the surrounding area and the proximity to existing housing. The <i>Development Plan</i> further states that <i>'new residential development that would adjoin existing one and/or two storey housing (backs or sides onto or faces), shall be no more than two storeys in height, unless a separation distance of 35m or greater is achieved.'</i></p>
<p>H9 Objective 4 To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme.</p>	<p>The proposed development includes 3-5 storey buildings on 'LC - Local Centre' zoned lands, within 35m of existing two-storey housing within Mount Carmel Park and therefore would not comply with the criteria outlined in Section 11.2.7 of the <i>Development Plan</i>.</p> <p>As such, notwithstanding recent National Policy provisions which seek to supersede prescriptive height guidance in appropriate locations, it is acknowledged that a material contravention of the <i>Development Plan</i> occurs as a result of the non-compliance with Policy 9 Objective 3.</p> <p>A <i>Material Contravention Statement</i> accompanies this planning application and demonstrates how An Bord Pleanála is justified to grant permission for the scheme having regard to Section 37(2)(b) of the <i>Planning and Development Act 2000</i> (as amended).</p>
<p>HOUSING (H) Policy 10 Mix of Dwelling Types It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of</p>	<p>The proposed development provides the following unit mix:</p> <ul style="list-style-type: none"> ● 2 No. Studio units (c. 2%) ● 45 No. 1 bed apartment units (c. 43%)

<p>the Interim South Dublin County Council Housing Strategy 2016-2022.</p>	<ul style="list-style-type: none"> • 2 No. 1 bed duplex apartment units (c. 2%) • 44 No. 2 bed apartment units (c. 43%) • 2 No. 2 bed duplex apartment units (c. 2%) • 5 No. 3 bed apartment units (c. 4%)
<p>H10 Objective 1 To ensure that new residential developments provide for a wide variety of housing types, sizes, and tenures in line with the Interim South Dublin County Council Housing Strategy 2016-2022.</p>	<p>The Interim South Dublin County Council Housing Strategy 2016-2022 states that the highest proportion of the population is between 25-54 years of age. In terms of housing types needed, Section 8.3 states that the <i>'inclusion of combinations of detached, semi detached, terraced, single storey and apartment units is essential.'</i></p> <p>Although a mix of unit types in terms of houses and apartments is not proposed within the scheme, it is considered that the mix of apartment types is appropriate due to the shortage of one and two bedroom apartments in South Dublin County Council administrative area (as demonstrated in the enclosed <i>Unit Mix Review & Justification Report</i>, prepared by Hooke & MacDonald) and the demographic age profile of the area (as demonstrated by the enclosed <i>Community and Social Infrastructure Audit</i>) and the need to accommodate higher densities in line with strategic planning policy.</p> <p>The proposed scheme will provide for a mix of apartment typologies and thus contribute to the overall residential mix within the wider area and facilitate a range of household sizes for both young and older people.</p>
<p>Policy H11 Objectives 1 Residential Design and Layout It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of</p>	<p>The proposed site layout and scheme design will comply with the standards provided for in Chapter 11 of the <i>Development Plan</i> as demonstrated in the accompanying <i>Architectural Design Statement</i>, prepared by OMP Architects.</p>

<p>individual dwelling units and the overall layout and appearance of the development.</p>	<p>The <i>Energy and Sustainability Report</i>, prepared by OCSC Consulting Engineers, is enclosed with this planning application. This report identifies the energy efficiency measures associated with the design, construction, ongoing management and maintenance of the proposed development.</p> <p>The proposed development will comply with Part L 2021 (NZEB) for residential areas and Part L 2021 (NZEB) for non-residential areas. As part of the development’s efforts to further reduce energy consumption, the project is targeting an A2/A3 BER (Building Energy Rating).</p>
<p>H11 Objective 1 To promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in Chapter 11 Implementation.</p>	
<p>H11 Objective 2 To promote new residential developments taking account of energy efficiency, prioritising passive house construction standards, as well as renewable energy opportunities, including solar energy where appropriate, in accordance with Part L of the Building Regulations.</p>	
<p>HOUSING (H) Policy 12 Public Open Space It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity, and amenity of the area.</p>	<p>The proposed development includes a high quality, public open space, along Firhouse Road and to the northeast corner of the application site. The apartment units will also be served by dedicated communal open spaces located centrally between the blocks and at roof terrace levels. A clear hierarchy of open space is provided for.</p> <p>Section 11.3.1 (iii) of the <i>Development Plan</i> specifies that all new residential developments shall be required to incorporate a minimum of 10% of the total site area as public open space (save for areas that are designated Zoning Objective RES-N).</p> <p>Based on the size of the site, this would equate to a requirement for c. 460 sqm. The total quantum of open space proposed is c. 1,347 sqm (29%) and thus significantly exceeds the minimum requirement. The public open space adjacent to Firhouse Road and Mount Carmel Park includes path along the road frontages; planted landscape</p>
<p>H12 Objective 1 To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p>	
<p>H12 Objective 2</p>	

<p>To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.</p>	<p>buffers; improved biodiversity; amenity tree, shrub, ornamental grass, bulb, and perennial planting; a path to the front of the development's elevations; natural SuDS stormwater attenuation; and play-along-the-way provisions for all ages and abilities.</p>
<p>H12 Objective 3 To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments.</p>	<p>The existing area currently comprises an asphalt-surfaced car park and the public open space proposed will turn this into a heavily planted space with improved legibility and universal access for the public.</p> <p>Three communal amenity spaces (semi-private), with pockets of gathering and play, are provided by way of a podium gardens between Block 01 and 02 at Level 01 (accessible from the adjacent public realms) and roof gardens. All communal open spaces are offered passive surveillance by the internal blocks, creating a safe, permeable, and concurrent spaces. The landscaping proposal ensures that an integrated green infrastructure network is created.</p> <p>Combined, there is 295.9 sq m of play space provided at the upper podium roof garden.</p>
<p>HOUSING (H) Policy 13 Private and Semi Private Open Space It is the policy of the Council to ensure that all dwellings have access to high quality private open space (inc. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.</p>	<p>All own door apartments and ground floor units are provided with private terraces, whilst apartments at upper level all have private balconies which are offered appropriate privacy.</p> <p>Each of the apartment blocks has direct access to a dedicated communal open space area at podium level and roof levels (c. 499 sq m) which accords with the minimum size standards in the <i>Development Plan</i> and <i>Apartment Guidelines</i>, as demonstrated in the architectural <i>Technical Document</i> and the HQA.</p>
<p>H13 Objective 1 To ensure that all private open spaces for apartments and duplexes including balconies, patios and roof gardens are designed in accordance with the qualitative and quantitative standards (including minimum balcony size and depth) set out under Sustainable Urban Housing: Design</p>	<p>The landscaping proposal detailed above ensures that an integrated green infrastructure network is created which complements the green infrastructure for</p>

<p>Standards for New Apartments, DECLG (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p>	<p>the adjoining sites and the wider area. The planning application will ensure that the proposed open space and development in general <i>“is integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and bio-diversity links”</i>.</p>
<p>H13 Objective 2 To ensure that new apartments have access to high quality and integrated semi-private open space that supports a range of active and passive uses, in accordance with the quantitative standards set out in Chapter 11 Implementation.</p>	<p>All apartment balconies/terraces either meet or exceed the minimum standards outlined in <i>Apartment Guidelines</i>. The design, location and orientation of the balconies/terraces also ensure high qualitative standards are achieved.</p>
<p>H13 Objective 3 To ensure that private amenity spaces for houses are designed in accordance with the quantitative standards set out in Chapter 11.0 Implementation and the qualitative standards set out under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) including the accompanying Urban Design Manual – A Best Practice Guide (2009).</p>	<p>The <i>Landscape Design Rationale + Statement of Response</i> and landscape drawing pack submitted with this planning application provides full details on all public, private and communal open spaces.</p>
<p>HOUSING (H) Policy 14 Internal Residential Accommodation It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long term needs of a variety of household types and sizes.</p>	<p>This is achieved within the unit typologies proposed. Each of the proposed apartment units meets or exceeds the minimum standards for residential unit size.</p> <p>The development provides a mix of Studio, 1, 2 and 3 bedroom units that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident.</p> <p>The <i>Architectural Design Statement</i>, prepared by OMP Architects, provides further details with regard to the above and is submitted as part of this planning application.</p>
<p>H14 Objective 1 To ensure that all residential units and residential buildings are designed in</p>	<p>A HQA and architectural <i>Technical Document</i>, prepared by OMP Architect, is enclosed with this planning application and</p>

<p>accordance with the relevant quantitative standards, qualitative standards and recommendations contained in Sustainable Urban Housing: Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the companion Urban Design Manual and have regard to the standards and targets contained in Quality Housing for Sustainable Communities (2007), particularly the standards and recommendations that relate to internal amenity/layout, overall unit size, internal room sizes, room dimensions, aspect, sound insulation, communal facilities, storage, sustainability and energy efficiency.</p>	<p>shows full compliance with the relevant quantitative standards, qualitative standards and recommendations.</p> <p>It is noted that the size of the proposed studio apartments falls slightly short of the 40 sq m standard and this is therefore identified as a material contravention.</p> <p>In this regard, a <i>Material Contravention Statement</i> accompanies this planning application and demonstrates how An Bord Pleanála is justified to grant permission for the scheme having regard to Section 37(2)(b) of the <i>Planning and Development Act 2000</i> (as amended).</p>
<p>HOUSING (H) Policy 15 Privacy and Security 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.</p>	<p>There is clear definition between private, semi-private and public open space as showcased in the enclosed <i>Architectural Design Statement</i>, prepared by OMP Architects and in the architectural drawings.</p>
<p>H15 Objective 1 To ensure that there is a clear definition between private, semi-private and public open space that serves residential development.</p>	<p>The layout and block design of the scheme ensures that passive surveillance of streets and open spaces are maximised. Ample separation distances are provided between blocks and nearby residential development, with privacy strips providing additional screening for ground floor apartments. Where the 22m separation distance is not met, OMP Architects have included innovative design solutions which will maintain a high standard of privacy (see enclosed architectural <i>Statement of Response</i> and <i>Architectural Design Statement</i>.)</p>
<p>H15 Objective 2 To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and spaces.</p>	
<p>H15 Objective 3 To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.</p>	

	<p>All private open spaces are provided with appropriate screening and boundary treatments to ensure privacy and security.</p>
<p>H15 Objective 4 To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.</p>	<p>The <i>Landscape Design Rationale + Statement of Response</i> and landscape drawing pack submitted with this planning application provides full details on all public, private and communal open spaces.</p>
<p>HOUSING (H) Policy 16 Steep or Varying Topography Sites It is the policy of the Council to ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.</p>	
<p>H16 Objective 1 To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site’s natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).</p>	<p>The proposed design and layout have been fully informed by the topography of the site and seek to minimise the level of cut and fill, whilst still achieving a sustainable mix and density of residential development. Further design details of the scheme are provided in the enclosed <i>Architectural Design Statement</i>, prepared by OMP Architects.</p>
<p>HOUSING (H) Policy 17 Residential Consolidation It is the policy of the Council to 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>	<p>Section 11.3.2 of the <i>Development Plan</i> outlines that on smaller sites of approximately 0.5 hectares or less a degree of architectural integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes. Full details on material finishes and built form can be found in the <i>Architectural Design Statement</i>, prepared by OMP Architects.</p>
<p>H17 Objective 1 To support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.</p>	<p>The application will seek to develop an infill site measuring c. 0.46 hectares in an established area which will utilise existing infrastructure and services, as demonstrated by the enclosed <i>Architectural Design</i></p>

<p>H17 Objective 4 To promote and encourage residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.</p>	<p><i>Statement</i> in accordance with the <i>Development Plan</i> policy objectives.</p>
<p>H17 Objective 5 To ensure that new development in established areas does not impact negatively on the amenities or character of an area.</p>	<p>The subject site is largely defined by hardstanding concrete car park, with no significant site features such vegetation or significant tree stands. The rubble stone boundary wall that defines the north/western site boundary will be retained and protected during the construction phases, should permission be granted.</p>
<p>H17 Objective 7 To support and facilitate the replacement of existing dwellings with one or more replacement dwellings, subject to the protection of existing residential amenities and the preservation of the established character (including historic character and visual setting) of the area (see Section 9.1.4 Older Buildings, Estates and Streetscapes).</p>	<p>As demonstrated in the enclosed assessments, the proposed development will not negatively impact on the amenities or character of the area and will instead provide significant public gain through the delivery of housing units, a mix of uses and a vastly improved public realm and public open space.</p> <p>No dwellings are proposed to be demolished as part of the subject application and all building on site are either vacant or used for commercial purposes.</p>

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 2 (Housing), unless otherwise identified as a material contravention.

Chapter 3 - Community Infrastructure	
<p>COMMUNITY INFRASTRUCTURE (C) Policy 8 – Childcare Facilities Policy C8 (a) It is the policy of the Council to support and facilitate the provision of good quality and accessible childcare facilities at suitable locations in the County.</p> <p>Policy C8 (b) It is the policy of the Council to require the provision of new childcare facilities in tandem with the delivery of new communities.</p>	<p>The proposed development includes a small-scale c. 114 sqm crèche that can accommodate c. 26 child spaces. The creche has been strategically located to as not to cause a nuisance to existing, or future residents, and complies with the policy objectives which relate to suitable locations for childcare facilities.</p>

<p>C8 Objective 1 To support and facilitate the provision of childcare infrastructure at suitable locations such as town, village, district and local centres, adjacent to school sites and in employment areas.</p>	
<p>C8 Objective 3 To support the provision of small scale childcare facilities in residential areas subject to appropriate safeguards to protect the amenities of the area, having regard to noise pollution and traffic management.</p>	
Healthcare Facilities	
<p>COMMUNITY INFRASTRUCTURE (C) Policy 11 Healthcare Facilities (Overarching) Policy C11b It is the policy of the Council to support and encourage the integration of healthcare facilities within new and existing communities that are appropriate to the size and scale of each settlement.</p>	<p>The proposed development, located on lands zoned 'LC - Local Centre', includes a medical use (c. 59 sq m) at ground floor level which will be fully accessible by public transport, on foot or by bicycle. This inclusion of this use will benefit the local community and comply with the lands use zoning objective LC.</p>
<p>C11 Objective 2 To promote the integration of healthcare facilities within new and existing communities that are appropriate to the size and scale of each settlement.</p>	
<p>Policy C11 Objective 4 To direct healthcare facilities into town, village, district and local centres and to locations that are accessible by public transport, walking and cycling, in the first instance.</p>	

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 3 (Community Infrastructure).

Chapter 5 - Urban Centres & Retailing	
<p>URBAN CENTRES (UC) Policy 1 Urban Centres Overarching It is the policy of the Council to continue to develop the County's network of town centres, village centres, district centres and local centres, based on the following hierarchy:</p> <ul style="list-style-type: none"> ➤ Tallaght as the County Town; ➤ Clondalkin as a vibrant Town Centre; ➤ Traditional Village Centres as vibrant and sustainable centres; ➤ A network of District Centres to serve a district catchment; and ➤ A network of Local Centres and local shops to serve a local catchment. 	<p>The proposed development complies, in full, with the policy requirements relating to the urban centres.</p> <p>A range of mix of day and evening time uses are provided to serve the local catchment which is appropriate for the ranking of Firhouse within the urban hierarchy.</p> <p>The application also seeks to utilise a large area of hardstanding area and transform it into an attractive, landscaped environment to be enjoyed by residents and the local community.</p>
<p>UC1 Objective 1 To direct retail, commercial, leisure, entertainment, civic, community and cultural uses into town, village, district and local centres and to achieve a critical mass of development and a mix of uses that is appropriate to each level in the urban hierarchy.</p>	<p>Permeability is enhance through the site by way of a new pedestrian access route. The proposal will also improve upon the existing high-quality pedestrian and cycle network currently available within the area.</p>
<p>UC1 Objective 3 To protect the quality, ambiance, vibrancy and vitality of urban centres by promoting an appropriate mix of day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses and to limit or control uses that might have a detrimental impact on the amenities of centres.</p>	<p>The enclosed <i>Architectural Design Statement</i>, prepared by OMP Architects, and the <i>Landscape Design Rationale + Statement of Response</i>, prepared by Studio Aula, clearly demonstrate the high standard of urban design which has been integrated into the scheme.</p>
<p>UC1 Objective 4 To promote a high standard of urban design in urban centres that contributes to the creation of safe and attractive streets and spaces and creates desirable places to work, live and visit.</p>	<p>Compliance with the Urban Centre policy objectives is further discussed within this Statement and the <i>Response to ABP Opinion</i>, prepared by Tom Phillips + Associates.</p>

<p>UC1 Objective 5 To promote and facilitate environmental and public realm improvements in existing town, village, district and local centres to address environmental quality, urban design, safety, identity and image.</p>	
<p>UC1 Objective 7 To improve access to the village, district and local centres of the County with particular emphasis on public transport provision and improvements to walking and cycling infrastructure, including disability proofing.</p>	
<p>URBAN CENTRES (UC) Policy 5 Local Centres It is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the protection of the residential amenities of the surrounding area.</p>	
<p>UC5 Objective 1 To support the improvement of local centres, and encourage the use of upper floors, with due cognisance to the quality of urban design, integration, linkage, accessibility and protection of residential amenity.</p>	<p>The proposed development fully complies with the policy requirements relating to the local centres. The application seeks to deliver a high-quality mixed use scheme comprising a vibrant mix of non-residential uses at ground floor level with residential above. Quality urban design was central to the overall vision for the site due to its zoning objective, as noted by the during pre-application discussions.</p> <p>The submitted <i>Community and Social Infrastructure Audit</i>, demonstrates that there is no deficiency in community within the wider area.</p>
<p>UC5 Objective 2 To support and facilitate the location of small scale community facilities within accessible local centres and as part of large scale commercial development where a <i>deficiency in community space is demonstrated</i>, subject to adaptable design for a variety of uses.</p>	<p>The scheme will also include walking and cycling paths through the site which will improve the connections from Firhouse Road through to the Dodder Valley Park and beyond.</p>

<p>UC5 Objective 3 To improve walking and cycling infrastructure within the local catchment of centres.</p>	
<p>URBAN CENTRES (UC) Policy 6 Building Heights It is the policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.</p>	
<p>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.</p>	<p>The proposed development includes various building heights across the subject site, which is encouraged in Local Centres.</p> <p>The <i>Development Plan</i> notes that any developments that exceed five storeys is considered a ‘tall building’ (Section 11.2.7). The proposed development does not exceed 5 storeys in height and therefore complies, in full, with Policy 6.</p>
<p>UC6 Objective 2 To ensure that higher buildings in established areas take account of and respect the surrounding context.</p>	<p>The proposed building height strategy has been designed to fully respect the surrounding context.</p>
<p>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.</p>	
Retailing	
<p>R1 Objective 3 To support new retail provision in the County to meet the needs of the County’s population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.</p>	<p>Firhouse is designated ‘Level 4’ in the South Dublin County Retail Hierarchy according to Table 5.1 of the <i>Development Plan</i>. Categories and types of services provided in Level 4 locations are described as follows:</p> <p><i>“These centres usually contain one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and</i></p>

	<p><i>possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to-day needs of surrounding residents”.</i></p> <p>The proposed development includes one retail unit in the form of a barber shop (28 sq m) which will replace an existing barber shop located in the western corner of the subject site. The scale and type of retail unit proposed will not adversely impact on or draw trade from higher order retail centres and is sufficient to serve a local catchment.</p>
<p>R8 Objective 1 To support the development of Local Centres as sustainable, multifaceted, retail led mixed use centres.</p>	
<p>R8 Objective 2 To ensure that the scale and type of retail offer in Local Centres is sufficient to serve a local catchment, without adversely impacting on or drawing trade from higher order retail centres.</p>	<p>It is also proposed to demolish the existing building to the west of the site which is currently occupied by a betting office. Discussions have taken place between the owner of the betting office and the Applicant, and in an effort to not displace this existing use, the proposed development makes provision for a betting office at ground floor level. The number of betting offices in the area will therefore not increase as a result of the proposed development.</p>
<p>R11 Objective 1 To prevent an excessive concentration of off-licence and betting offices.</p>	

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 5 (Urban Centre & Retailing).

Chapter 6 - Transport & Mobility	
<p>TRANSPORT AND MOBILITY (TM) Policy 2 Public Transport TM2 Objective 3 To generate additional demand for public transport services through integrated land use planning and maximising access to existing and planned public transport services throughout the network.</p>	<p>The proposed development provides 100 No. residential units (and non-residential uses) on lands adjacent to existing public transport services. It is therefore inevitable that residents and employees of the proposed development will use the existing (soon to be enhanced) public transport due to ease of access, thus encouraging the use of more sustainable modes of transport and increasing demand. This location of the site, by virtue of its proximity to high quality pedestrian and cycle infrastructure, will lessen the dependency on the private car.</p>
<p>TRANSPORT AND MOBILITY (TM) Policy 2 Public Transport TM2 Objective 3 To generate additional demand for public transport services through integrated land use planning and maximising access to</p>	

<p>existing and planned public transport services throughout the network.</p>	<p>The proposed development, and its design, further seeks to maximise accessibility and permeability for pedestrians and cyclists, with the provision of clearly delineated access routes through the site from Firhouse Road to Mount Carmel Park and beyond. Permeability and connectivity through to the Dodder Valley Park and the N81 will be greatly improved.</p> <p>The proposal aims to prioritise pedestrian and cyclist movements over the private car through the inclusion of wide paths and pedestrian way finding. These routes will also provide more direct access to local shops and services and public transport and will be fully accessible. The routes are well lit and overlooked by adjoining residential developments and a safe environment will be created.</p> <p>The proposal also includes significant improvement and upgrades to the public realm along Firhouse Road which currently comprises primarily hardstanding car park.</p> <p>As confirmed in the submitted Statement of Compliance with DMURS which forms part of the enclosed TTA, the streets/pathways have been designed to cater for pedestrian and cyclist priority. All routes through the site will be lit by public lighting, as per the submitted plans for same (Refer to the enclosed Site Lighting Plan, prepared by OCSC Consulting Engineers).</p> <p>Slow speed vehicular movements will be encouraged so pedestrians and cyclists will be able to travel safely through and around the perimeter of the site.</p>
<p>Transport and Mobility (TM) Policy 3 Walking and Cycling It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.</p>	
<p>TM3 Objective 2 To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities.</p>	
<p>TM3 Objective 3 To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists within a safe and comfortable environment for a wide range of ages, abilities, and journey types.</p>	
<p>TM3 Objective 4 To prioritise the upgrade of footpaths, public lighting & public realm maintenance and supporting signage on public roads/paths where a demonstrated need exists for busy routes used by runners & walkers.</p>	
<p>TM3 Objective 6 To ensure that all walking and cycling routes have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.</p>	

<p>TRANSPORT AND MOBILITY (TM) Policy 6 Road and Street Design It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present.</p>	
<p>TRANSPORT AND MOBILITY (TM) Policy 7 Car Parking It is the policy of Council to take a balanced approach to the provision of car parking with the aim of meeting the needs of businesses and communities whilst promoting a transition towards more sustainable forms of transportation.</p>	<p>The proposed development includes a mix of land uses and careful consideration has been given to the allocation of car spaces based on demand as well as the standards outlined in Section 11.4.2 of the <i>Development Plan</i> (discussed below).</p> <p>The design and management of all car parking within the scheme is discussed in more detail in the enclosed TTA.</p>
<p>TM7 Objective 1 To carefully consider the number of parking spaces provided to service the needs of new development.</p>	<p>All car parking proposed within the scheme is located within the basement in order to maximise the amount of useable public open space and to enhance the public realm to the forefront of the development, which the Local Authority indicated a preference for. An area for HGV manoeuvring at surface level is required to facilitate delivery of goods to the non-residential uses. Deliveries will take place at certain times of the day so as not to cause nuisance to pedestrians/cyclists.</p>
<p>TM7 Objective 2 To effectively design and manage parking to ensure the efficient turnover of spaces.</p>	
<p>TM7 Objective 3 To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape.</p>	
<p>TM7 Objective 4 To make provisions for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and land owners.</p>	<p>EV car parking space (17 No. in total) can be provided within the basement car park. Specific requirements can be agreed with the planning authority as a condition of permission to be agreed prior to commencement of development.</p>

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 6 (Transport & Mobility).

Chapter 7 - Infrastructure & Environmental Quality	
<p>INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 1 Water & Wastewater It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County.</p>	<p>This planning application is supported by a full suite of engineering proposals to serve the proposed development, including extensive SuDS proposals which are further detailed in the <i>Water Services Report</i>, prepared by PHM Consulting.</p> <p>Furthermore, the SuDS proposals are detailed the <i>Landscape Design Rationale + Statement of Response</i>, prepared by Studio Aula, supported by an Ecological Impact Assessment (EclA), prepared by Flynn Furney Environmental Consultants.</p>
<p>IE1 Objective 1 To work in conjunction with Irish Water to protect, manage and optimise water supply and foul drainage networks in the County.</p>	<p>The flood risk assessment has been carried out in accordance with The Planning System and Flood Risk Assessment Guidelines for Planning Authorities whereby the developed site is shown not to be at significant risk from flooding and to not create a significant risk to adjoining areas or downstream (See enclosed <i>Water Services Report</i>)</p>
<p>IE1 Objective 7 To prohibit the connection of surface water outflows to the foul drainage network where separation systems are available.</p>	<p>Furthermore, the <i>Environmental Impact Assessment (EIA) Screening</i> report enclosed with this planning application gives full consideration to the proposed development from an air and noise pollution and waste management perspective. The application is also accompanied by a <i>Construction Waste Management Plan (CWMP)</i> and a <i>Construction Environmental Management Plan (CEMP)</i>, prepared by PHM Consulting.</p>
<p>INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 2 Surface Water & Groundwater It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.</p>	<p>This planning application is also supported by an <i>Energy and Sustainability Report</i>, prepared by OCSC Consulting Engineers, which sets out the energy efficiency measures associated with the proposed development, including a district heating system, and electric vehicle parking. Having regard to the above, we conclude that the proposed development aligns with the</p>
<p>IE2 Objective 3 To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.</p>	
<p>IE2 Objective 4 To incorporate Sustainable Urban Drainage Systems (SUDS) as part of Local Area Plans, Planning Schemes, Framework Plans and</p>	

<p>Design Statements to address the potential for Sustainable Urban Drainage at a site and/or district scale, including the potential for wetland facilities.</p>	<p>overarching policy themes contained within the <i>Development Plan</i>.</p>
<p>IE2 Objective 5 To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.</p>	<p>OCSC Consulting Engineers have prepared a <i>Preliminary Environmental Site Assessment</i> report which considers any potential soil and groundwater contamination risk associated with the proposed development.</p>
<p>IE2 Objective 9 To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands, and natural floodplains, within the County from inappropriate development. This will include protection buffers in riverine and wetland areas as appropriate (see also Objective G3 Objective 2 – Biodiversity Protection Zone).</p>	
<p>IE2 Objective 10 To require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, in particular for brownfield development.</p>	
<p>INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 3 Flood Risk It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.</p>	
<p>IE3 Objective 3: To manage flood risk in the County in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014), in particular when preparing plans and programmes and assessing</p>	

<p>development proposals. For lands identified as being at risk of flooding in (but not limited to) the Strategic Flood Risk Assessment, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these Guidelines, paying particular attention to residual flood risks and any proposed site specific flood management measures.</p>	
<p>INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 5 Waste Management It is the policy of the Council to implement European Union, National and Regional waste and related environmental policy, legislation, guidance, and codes of practice to improve management of material resources and wastes.</p>	<p>The application is accompanied by an <i>Operational Waste Management Plan (OWMP)</i>, prepared by OCSC Consulting Engineers, which includes full details on waste management and recycling.</p>
<p>IE5 Objective 8 To secure appropriate provision for the sustainable management of waste within developments, including the provision of facilities for the storage, separation, and collection of such waste.</p>	
<p>INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE) Policy 7 Environmental Quality It is the policy of the Council to have regard to European Union, National and Regional policy relating to air quality, light pollution, and noise pollution and to seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity.</p>	<p>The <i>EIA Screening</i> report, prepared by AWN Consulting, and enclosed with this planning application concludes that there are no likely significant environmental effects in terms of the material assets, for the proposed development and considering the existing environment and proposed future environment which would warrant preparation of an EIA.</p>
<p>IE7 Objective 4 To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multifunctional uses of streets including movement and recreation as detailed in the</p>	<p>The application is accompanied by a <i>Noise Assessment</i>, prepared by Allegro Acoustics, which includes mitigation measures to ensure there is minimal noise disturbance.</p>

<p>Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).</p>	
<p>IE7 Objective 5 To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas.</p>	<p>The design of all external lighting schemes will ensure that light spillage or pollution in the immediate surrounding environment is minimised and the residential amenity of the surrounding area will not be affected.</p>

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 7 (Infrastructure and Environmental Quality).

Chapter 8 - Green Infrastructure	
<p>GREEN INFRASTRUCTURE (G) Policy 1 Overarching It is the policy of the Council to protect, enhance and further develop a multifunctional Green Infrastructure network by building an interconnected network of parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.</p>	<p>The proposed development is supported by a significant landscaping proposal which ensures the delivery of high-quality open space, including play space provision, the retention of special landscape features such as mature trees and local biodiversity enhancements and the delivery of a significant SuDS scheme. Furthermore, from an ecological and Habitats Directive perspective, the planning application is supported by a <i>Screening for Appropriate Assessment</i> and a full <i>EIA Screening</i> report</p>
<p>G1 Objective 1 To establish a coherent, integrated and evolving Green Infrastructure network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams forming the strategic links and to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans, such as Local Area Plans and other approved plans.</p>	<p>The proposed open spaces, together with their connectivity with the existing open space to the south, will significantly enhance the green infrastructure network in the local area.</p> <p>Having regard to the following sections which address the development management standards, we confirm that the proposed development complies with the overarching themes contained within the <i>Development Plan</i>.</p>
<p>GREEN INFRASTRUCTURE (G) Policy 2 Green Infrastructure Network It is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure, and enhance biodiversity,</p>	<p>The existing site currently comprises extensive asphalt-surfaced car park and the design proposals envisage turning it into a heavily planted space which will enhance and support biodiversity. The planting</p>

<p>and provide readily accessible parks, open spaces, and recreational facilities.</p>	<p>proposals will therefore represent a significant increase in 'greening' of the subject site.</p>
<p>G2 Objective 2 To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.</p>	<p>The enclosed landscape drawing pack and accompanying <i>Landscape Design Rationale + Statement of Response</i> provides full details on all Green Infrastructure initiatives.</p>
<p>G2 Objective 3 To restrict development that would fragment or prejudice the Green Infrastructure network.</p>	<p>There are no trees within the site, however, there are existing mature trees located on the adjoining site to the west and north.</p>
<p>G2 Objective 5 To integrate Green Infrastructure as an essential component of all new developments.</p>	<p>Potential impacts on these trees have been assessed and tree protection measures have been specified in accordance with best practice and are sufficient to safeguard neighbouring trees during the proposed works (A full arborcultural pack, prepared by CM Arb is enclosed with this planning application)</p>
<p>G2 Objective 9 To preserve, protect and augment trees, groups of trees, woodlands, and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.</p>	<p>An invasive species survey was also carried, the result of which found:</p>
<p>G2 Objective 10 To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.</p>	<p><i>'No species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011), were found within the boundary. Buddleja davidii, an invasive species with a Medium Impact risk, was noted in abundance.'</i></p>
<p>G2 Objective 11 To incorporate appropriate elements of Green Infrastructure e.g. new tree planting, grass verges, planters etc. into existing areas of hard infrastructure wherever possible, thereby integrating these areas of existing urban environment into the overall Green Infrastructure network.</p>	
<p>G2 Objective 12 To seek to control and manage non-native invasive species and to develop strategies with relevant stakeholders to assist in the</p>	

<p>control of these species throughout the County.</p>	
<p>G2 Objective 13 To seek to prevent the loss of woodlands, hedgerows, aquatic habitats, and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder.</p>	
<p>GREEN INFRASTRUCTURE (G) Policy 4 Public Open Space and Landscape Setting It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.</p>	
<p>G4 Objective 1 To support and facilitate the provision of a network of high quality, well located and multifunctional public parks, and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.</p>	<p>The subject site area measures c. 0.46 hectares (4,606 sq m) and c. 1,347 sq m (c. 29% of the overall site area) of public open space has been provided as part of the proposed development (excluding 'peripheral open space'). The area of public open space is defined as 'Smaller Residential Open Space', 'Civic Space/Square' with steppingstone 'Amenity Green Space' according to the <i>Development Plan</i> categorisation.</p>
<p>G4 Objective 2 To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.</p>	
<p>G4 Objective 4 To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.</p>	<p>Public lighting has been carefully selected to ensure bat species in the vicinity are not affected.</p>

<p>GREEN INFRASTRUCTURE (G) Policy 5 Sustainable Urban Drainage Systems It is the policy of the Council to promote and support the development of Sustainable Urban Drainage Systems (SUDS) in the County and to maximise the amenity and biodiversity value of these systems.</p>	<p>Proposed SuDS include:</p> <ul style="list-style-type: none"> • Green/Blue roofs to ALL flat roof areas. • Blue roof system to the Basement Podium at ground floor level. • Infiltration Trenches within the public realm areas to the south and east of the building. • Tree pits and raingarden areas to the public realm areas. • Permeable surface paving and subsurface attenuation layer. • Maximum discharge rate of 1.5 l/s noted on drainage layout at the outfall Hydrobrake manhole. <p>Full details on SUDS measures can be found in the enclosed <i>Water Services Report</i> and <i>Landscape Architecture Design Rationale + Statement of Response</i>.</p>
<p>G5 Objective 1 To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.</p>	
<p>GREEN INFRASTRUCTURE (G) Policy 6 New Development in Urban Areas It is the policy of the Council to support the protection and enhancement of Green Infrastructure in all new development in urban areas, to strengthen Green Infrastructure linkage across the wider urban network and to achieve the highest standards of living and working environments.</p>	
<p>G6 Objective 2 To require new development to provide links into the wider Green Infrastructure network, in particular where similar features exist on adjoining sites.</p>	
<p>G6 Objective 3 To require multifunctional open space provision within all new developments that includes provision for ecology and sustainable water management.</p>	

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 8 (Green Infrastructure).

Chapter 9 - Heritage, Conservation & Landscapes	
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 2 Archaeological Heritage</p>	<p>The planning application is supported by an <i>Archaeological Impact assessment and Method Statement</i>.</p>

<p>It is the policy of the Council to manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p>	
<p>HCL2 Objective 2 To ensure that development is designed to avoid impacting on archaeological heritage that is of significant interest including previously unknown sites, features and objects.</p>	<p>The report notes that the proposed development area falls within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places (Fig. 6). However, as the site is recorded as 'House - 18th/19th century' on the Sites and Monuments Record, the possibility of any physical elements of the RMP site extending into the proposed development area are negligible. Any impacts on Sally Park house are therefore deemed to be indirect, in the form of impacts on the visual amenity.</p>
<p>HCL2 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.</p>	<p>It is the Archaeologist's opinion, that the proposed development will not be visible from the grounds on the south side of the house. The development will be visible from the north side of the house, however as this is the rear of Sally Park, with the main façade, south facing, it is the opinion of the project Archaeologist that any impacts on the house are deemed only slightly negative.</p> <p>There are no known archaeological sites within the red line boundary of the development.</p> <p>The townland boundary which runs along the northern site boundary is notable and takes the form of a rubble and cement-built wall. It is proposed to maintain this boundary largely untouched and consequently the impacts here will be negligible.</p>
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 7 Landscapes It is the policy of the Council to preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.</p>	<p>The subject site is not located in an area deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity. A Landscape Character Baseline Study is included as part of the <i>Landscape Architecture Design Rationale + Statement of Response</i>.</p>

<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 8 Views and Prospects It is the policy of the Council to preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.</p>	<p>The application is accompanied by photomontages, prepared by Digital Dimensions and VIA.</p>
<p>HCL8 Objective 1 To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places.</p>	<p>The topography of the site, together with the locations of surrounding mature trees, has been used, where possible, to minimise visual impact yet deliver buildings to an appropriate height and scale. It is considered that this approach successfully integrates the new development into the area and whilst clearly comprising a new and higher density form of development than the prevailing two storey housing.</p>
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 9 Dublin Mountains It is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological, archaeological and amenity value of the Dublin Mountains, as a key element of the County’s Green Infrastructure network.</p>	<p>The proposal will not give rise to significant visual impacts as evidenced by the enclosed VIA). This assessment considers the visual impact of the development proposed when viewed from 12 No. viewpoints from a range of locations external to the site (See enclosed <i>Verified Photomontages</i> booklet, prepared by Digital Dimensions).</p>
<p>HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 12 Natura 2000 Sites It is the policy of the Council to support the conservation and improvement of Natura 2000 Sites and to protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site.</p>	<p>A <i>Screening for Appropriate Assessment</i>, prepared by Flynn Furney Environmental Consultants, is enclosed with the planning application.</p> <p>In summary, the report concludes that the proposed development, individually/in combination with other plans and projects (either directly or indirectly), is not likely to have any significant effects on any of the European sites.</p>

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 9 (Heritage Conservation & Landscapes).

Chapter 10 - Energy	
<p>ENERGY (E)</p> <p>Policy 4 Energy Performance in New Buildings</p> <p>It is the policy of the Council to ensure that new development is designed to take account of the impacts of climate change, and that energy efficiency and renewable energy measures are considered in accordance with national building regulations, policy and guidelines.</p>	<p>The <i>Energy and Sustainability Report</i> submitted with this planning application provides an overview of how the project intends to integrate sustainability as a key strategy into the development's design. A Building Energy Rating (BER) of A2/A3 has been targeted throughout. The energy and sustainability strategy will be implemented, and the proposed development will achieve all energy and sustainability targets.</p>
<p>E4 Objective 1</p> <p>To ensure that medium to large scale residential and commercial developments are designed to take account of the impacts of climate change, including the installation of rainwater harvesting systems, and that energy efficiency and renewable energy measures are incorporated in accordance with national building regulations, policy and guidelines.</p>	

Having regard to the above, we confirm that the proposed development complies with the *Development Plan* policies in respect to Chapter 10 (Energy).

4.2.5 Compliance with the Development Management Standards within the *South Dublin County Council Development Plan 2016-2022*

Chapter 11 of the *Development Plan* sets out the development standards and criteria that seek to ensure development takes place in an orderly and efficient manner.

The following development standards are relevant to the current application and are considered under the headings contained within Chapter 11 of the *Development Plan*:

Design Statements (Section 11.2.1)

This section of the *Development Plan* includes the following:

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

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

The enclosed *Architectural Design Statement*, prepared by OMP Architects, provides site analysis, concept plans and a response to the design criteria set out in the National Planning Guidance and relevant sections of the *Development Plan*. The application is also accompanied by a DMURS Compliance Statement (Section 6.0 of the enclosed TTA), prepared by Transport Insights.

Building Height (Section 11.2.7)

This section of the *Development Plan* requires that *'Proposals for higher buildings of over three storeys in residential areas should be accompanied by a site analysis (including character appraisal) and statement that addresses the impact of the development.'*

An *Architectural Design Statement* and *Statement of Response*, prepared by OMP Architects, is enclosed and includes a full site analysis and character appraisal in support of the proposed development.

Signage – Advertising (Section 11.2.8)

This section of the *Development Plan* relates to all signs erected on the exterior of buildings, within windows, as standalone structures or attached to public utilities.

Full regard has been given to criteria for advertising signs outlined in Table 11.19 of the *Development Plan*. Details on the size and location of the proposed signage are included in the enclosed architectural elevation drawings, prepared by OMP Architects. The Applicant is happy to accept a condition which requires that all advertising signage details must be agreed, in full, with the Local Authority.

Residential (Section 11.3.1)

This Section of the *Development Plan* sets out a number of development standards which will be considered as part of any new residential proposals. These are listed and responded to below:

Section 11.3.1(i) *Mix of Dwelling Types* of the *Development Plan* states:

'The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality. With the exception of student accommodation, proposals that include a high proportion of one bedroom dwellings (more than 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. Design Statements for residential or mixed use development proposals with a residential element (see Section 11.2.2 Design Statements) will be required to address the mix of dwelling types.'

The proposed development provides the following unit mix:

- 2 No. studio units (c. 2%);
- 47 No. 1 bed apartment (incl. duplex) units (c. 47%);
- 46 No. 2 bed apartment (incl. duplex) units (c. 46%); and
- 5 No. 3 bed apartment units (c. 5%).

It is recognised that the proposed development includes more than 10% one-bedroom dwelling types (50% in total, including studio units) and this is therefore identified as a material contravention (refer to the enclosed *Material Contravention Statement*).

The application is accompanied by a *Unit Mix Review & Justification Report*, prepared by Hooke & MacDonald Estate Agents and Property Services.

The conclusion of this report states:

'On review of the local and surrounding areas at Firhouse, there is a significant shortage of good quality modern apartments for sale or to rent in the market. The provision of the proposed unit mix at the Property, predominately one bedroom and two bedroom apartments, will allow for increased delivery of accommodation and more efficient use of land, thus allowing South Dublin County Council area, and the State, a better opportunity of meeting its housing targets, as previously outlined. And it will also assist in rebalancing the locality away from houses towards much needed apartments, which currently only make up 13% of the stock in the Local Authority area. This approach is also in line with the with national spatial strategies to increase densities.'

As such, in our opinion, the mix of apartment types is appropriate due to the significant quantum of traditional housing stock within the area (as evidenced in the *Unit Mix Review & Justification Report*) and the need to accommodate higher densities in line with strategic planning policy. The enclosed *Architectural Design Statement* also addresses the mix of dwelling types proposed.

The proposed scheme will provide for a mix of apartment typologies and thus contribute to the overall residential mix within the wider area and facilitate a range of household sizes.

Section 11.3.1(ii) *Residential Density* of the *Development Plan* states:

'In general the number of dwellings to be provided on a site should be determined with reference to the Departmental Guidelines document Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high capacity public transport facilities. In accordance with Departmental Guidance, the residential density (net) of new development should generally be greater than 35 dwellings per hectare, save in exceptional circumstances. Local Area Plans, SDZ Planning Schemes and Framework Plans will set out density bands in growth areas.'

For reasons outlined previously, the proposed residential density of 217 No. units per hectare is appropriate given the need to encourage medium to high-density residential development on serviced lands, in close proximity to good quality public transport which also have the benefit of being adjacent to high quality pedestrian and cyclist infrastructure. The capacity of the local public transport is discussed in the enclosed TTA.

Section 11.3.1(iii) *Public Open Space/Children’s Play* of the *Development Plan* states:

‘The Planning Authority will require public open space to be provided as an integral part of the design of new residential and mixed use developments...’

As well as stating the requirement to provide 10% of the total site area as public open space this section of the *Development Plan* outlines that a detailed Landscape Plan will be required for residential developments of 10 No. units and above. It further sets out requirements with regard to children’s play spaces and the need to provide natural play features. In this regard, the submitted landscaping drawing pack, prepared by Studio Aula, which included full details on all play spaces incorporated into the proposed development.

Section 11.3.1(iii) *Dwelling Standards* of the *Development Plan* states:

‘All apartments must accord with or exceed the open space and floor area standards set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2015) and the minimum floor areas set out in Table 11.21. An apartment refers to a dwelling unit that is not a house and may comprise an apartment or duplex unit.’

The minimum floor space standards for apartments outlined in the *Development Plan* are shown below:

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

Figure 4.3 Extract from Table 11.21 (Minimum Space Standards for Apartments) of the *Development Plan* (cropped by TPA, 2022.)

We can confirm that the majority of the apartments will accord with or exceed the open space and floor area standards set out in Table 11.21 above. We highlight that the total floor area standard for studio apartments (40 sq m) contained within the *Development Plan* is not met in this instance and is therefore identified as a material contravention. (Refer to the enclosed *Material Contravention Statement*)

The design of schemes fully accords with the minimum standards outlined in the *Apartment Guidelines* in relation to design, internal facilities, aspect, lift/stair cores, communal facilities, refuge storage, bicycle parking and children’s play and amenity spaces. The enclosed HQA, provides full details on a floor areas proposed within the scheme.

Section 11.3.1(v) *Privacy of the Development Plan* states:

'A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy.'

'Dwellings with direct street frontage should generally include a privacy strip of at least 1 metre or a front garden.'

The proposed design strategy has sought to maximise separation distances between opposing windows to ensure a high standard of residential accommodation within the scheme and also mitigate against any potential adverse impact upon neighbouring developments. There are however, a number of instances where the separation distances between opposing windows, both within and outside of the development, fall below 22 metres and this is therefore identified as a material contravention (refer to the enclosed *Material Contravention Statement*) which is addressed as a material contravention in the enclosed *Material Contravention Statement*.

We note the instances referred to by Section 11.3.1(v) whereby reduced separation distances may be acceptable. We confirm that despite the reduced separation distances, the design strategy, which includes the following mitigations/design elements to ensure that the proposed development does not give rise to an unacceptable impact upon the proposed standard of accommodation or surrounding neighbouring amenity:

- Inset/recessed balconies;
- Balcony positioning;
- Stepped/profiled Façade;
- Direction of window outlook;
- Blank façades;
- Privacy Screenings;
- Planted buffers; and
- Opaque glass.

Full details on the mitigation measures proposed within the scheme to avoid any potential privacy issues and overlooking is contained within the enclosed *Architectural Design Statement*.

Section 11.3.1(vi) *Dual Aspect Ratios* of the *Development Plan* states that *'dual aspect ratios in apartment schemes shall be provided in accordance with Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2015).'*

We can confirm, the proposed development provides for a dual aspect ratio of 50%, in accordance with the standards outlined in the *Apartment Guidelines*. The enclosed architectural *Technical Document, Architectural Design Statement, HQA* and architectural drawings, prepared by OMP Architects, provide full details on single and dual aspect units.

Section 11.3.1(vii) *Access Cores and Communal Areas* of the *Development Plan* states:

'Apartment schemes should seek to minimise the use of shared entrances, where possible, in favour of own door access at street level. Where shared access lobbies are proposed the number of units served by one entrance should be kept to a minimum. Projecting external staircases to access upper floors should be avoided as they can dominate the streetscape.'

Within Block 01, there are between eight to twelve apartments per stair core while Block 02 contains a maximum of twelve apartments per floor plate. The proposed duplex units will each have own door access, as confirmed by the enclosed architectural *Technical Document*.

Section 11.3.1(viii) *Clothes Drying Facilities* of the *Development Plan* states that *'adequately ventilated clothes drying facilities should be provided for apartment developments in the form of suitably sized communal facilities or individual facilities within each unit.'*

Each residential unit will be fitted with appropriately sized washing and drying facilities.

Residential Consolidation (Section 11.3.2)

This section of the *Development Plan* lists specific criteria which development on infill sites should abide by. In response to this, we can confirm:

- The proposed development has had full regard to the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009* and the companion Urban Design Manual, as outlined in Section 3.5 of this Statement and responded to in the enclosed *Architectural Design Statement*, prepared by OMP Architects.
- A full site analysis has been undertaken by OMP Architects which takes account of the local context. The surrounding built form, density, features, materials and finishes have all been fully considered.
- The subject site is void of pillars, gateways and vegetation. The rubble stone boundary wall along the northern and west site boundary will be fully retained and not be compromised through the construction phase of the proposed scheme.
- A transition in height is provided along the eastern site boundary in direct response to the adjacent two storey semi-detached housing within Mount Carmel Park housing estate. The design of the proposal has also been cognisant of the prevailing built height within the area, the Protected Views from the N81 to the north and nearby protected structures.
- The proposed development seeks a reduction in car parking standards as discussed previously. We submit that this section of the *Development Plan* allows for a degree of flexibility with regards to car parking standards based on the context of the public

transport provision and the proximity of services and facilities such as shops. We contend that this criterion has been met. The enclosed TTA justifies the reduced car parking provision.

- The application does not propose the demolition of any dwellings.

Retail Development (Section 11.3.6)

Section 11.3.6(i) *Retail Criteria* of the *Development Plan* states that 'new retail development shall accord with the requirements outlined in Chapter 5 *Urban Centres and Retail* and in Section 11.2' and specifies a list of additional criteria for consideration.

Though it is recognised that the sequential approach seeks to direct new retail development within town centres, major retail centres and district centres, it is submitted that the scale and form of the retail element proposed (barber shop measuring c. 28 sqm) is modest and will replace existing barber shop use on site.

Section 11.3.6(ii) *Restrictions on Uses* of the *Development Plan* outlines that certain uses be discouraged in urban centres. As such, the Planning Authority will seek to ensure that the quantum of betting offices is not disproportionate to the overall size and character of the area and that such development will not give rise to any negative impacts on the amenity of the area.

As discussed previously, the site is located within the 'LC - Local Centre' land zoning objectives whereby 'Betting Office' is a 'Permitted in Principle' and use. The zoning supports the proposed use subject to other relevant policies and objectives outlined in the *Development Plan*. In our view, it is a reasonable objective, and the proposed type of use (betting office) should be carefully assessed, particularly if there is potential for a 'proliferation' of betting offices as a direct result of the proposal. Importantly, we note that the application seeks for an existing betting office use to cease and to be replaced by a new betting office, albeit in a new building and size on site. Therefore, the proposal will not increase the number of betting offices within the area. Further to this, the betting office will also offer to maximise passive and active surveillance of the street frontage and open space alongside the other non-residential uses at ground floor into the evening.

Early Childhood Care and Education (Section 11.2.13)

This section of the *Development Plan* has regard to proposals for childcare facilities. The proposed development includes a c. 114 sq m creche having regard to the requirements of *Childcare Facilities, 2001* (discussed in Section 3.8 of this Statement) which provides that 1 No. childcare facility will be provided per 75 No. new residential units proposed. We refer the Planning Authority to the enclosed *Architectural Design Statement*, prepared by OMP Architects, for full details on the creche facility, its suitability and location.

Healthcare Facilities (Section 11.2.13)

This section of the *Development Plan* states that ‘small scale medical surgeries/practices (doctor/dentist/physiotherapist, etc) are open for consideration in established areas, subject to appropriate safeguards to protect the residential amenity of the area.’

The proposed medical unit is intended to be accompanied by doctor/dentist, or similar. There are 4 No. consulting rooms proposed which would occupy 3 No. consultants and 1 No. support staff, approximately. It is expected that the consultancy will operate within normal working hours. Full details on the proposed medical unit are contained within the *Architectural Design Statement*, prepared by OMP Architects.

Bicycle Parking Standards (Section 11.4.1)

Bicycle storage for the dwelling units is provided through a combination of surface spaces and basement bicycle stores within the residential blocks. A total of 270 No. spaces are proposed, which is in excess of the minimum of 44 No. spaces required by the *Development Plan*.

It is noted that the proposed number of cycle spaces also complies with the bicycle parking standards set out in the *Apartment Guidelines*. Please refer to Sections 5.5 of the TTA for further details regarding bicycle parking provision.

Car Parking Standards (Section 11.4.2)

Maximum car parking standards for residential developments are identified in Table 11.24 of the *Development Plan*. As the subject site is located within close proximity to good public transport links (i.e. within 400m of Dublin Bus routes nos. 75, 75b, 49 and 65b), it is classified as being within Zone 2.

The (maximum) parking standards for Zone 2 are as follows:

Category	Land Use	Zone 2 Standard	Max. spaces required
Residential	1 - Bed Apartment	0.75 spaces	37
	2 - Bed Apartment	1 space	45
	3 - Bed Apartment	1.25 spaces	6
Retail and retail Service	Café	1 per 20 sqm GFA	3
	Betting Office	1 per 25sqm GFA	3
	Office	1 per 25 sqm GFA	1
Medical	Clinics and Group Practices	1.5 per consulting room	2
Education	Creche	1 per classroom	1
Total:			101

Table 4.3: Car parking standards applicable to the application extracted from Table 11.24 of the *Development Plan*

A total of 80 No. car parking spaces is provided to serve the proposed development at basement level. As referenced previously, the site benefits from its close proximity to high

quality public transport routes. The surrounding context of the site is also characterised by a well-developed pedestrian and cycling network. The proposed reduction in car parking was also discussed at each pre-application meeting with the Local Authority and was deemed to be acceptable.

In total, a proposed car parking ratio of 0.63 spaces per residential unit is proposed. Further detail regarding the car parking strategy is provided within the TTA report provided by Transport Insights.

4.2.6 Emerging Policy

The *Draft South Dublin County Development Plan, 2022-2028* (herein referred to as 'Draft Plan') went on public display on 7th July 2021.



Figure 4.4: Cover of the *Draft South Dublin County Development Plan, 2022-2028*.

Public consultation on the Amendments to the *Draft Plan* began on the 29th March 2022. It is understood that the adopted Plan will come into force 6 weeks after the Development Plan is made on July 1, 2022. It is anticipated that the *South Dublin County Development Plan, 2022-2028* will likely be adopted c. 12th August 2022, and before a decision is expected on this planning application.

The likely content of the new County Development Plan has been addressed in greater detail in Appendix A of this Statement. This draws upon the material alterations that is in the public domain published on the 29th March 2022.

5.0 CONCLUSION

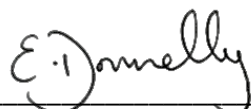
In summary, the proposed development will provide for, inter alia, 100 No. apartments on underutilised, serviced, lands, in an existing urban area in Dublin.

The proposed non-residential uses and public open space will contribute to the Firhouse area from a placemaking perspective, providing a new destination, sensitively stitched into an existing community, for both future occupiers and existing residents.

1. *National Planning Framework (Ireland 2040 – Our Plan);*
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031;*
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009);*
4. *Urban Design Manual: A Best Practice Guide (2009);*
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018);*
6. *Childcare Facilities – Guidelines for Planning Authorities (2001);*
7. *Part V of the Planning and Development Act 2000: Guidelines (2017);*
8. *Design Manual for Urban Roads and Streets (DMURS) (2013);*
9. *Urban Development and Building Heights, Guidelines for Planning Authorities Consultation Draft August (2018);*
10. *The Planning System and Flood Risk Management (2009);*
11. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009);*
12. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);*
13. *South Dublin County Council Development Plan 2016-2022; and*
14. *Draft South Dublin County Development Plan 2022 – 2028.*

In conclusion, we contend that the development of the application site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development.

Yours sincerely



Lizzie Donnelly
Associate
Tom Phillips + Associates

**APPENDIX A - PLANNING STATEMENT OF CONSISTENCY RELATING
TO THE COMPLIANCE OF THE PROPOSED DEVELOPMENT WITH THE
DRAFT SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028
(INCLUDING PROPOSED MATERIAL ALTERATIONS).**

PLANNING STATEMENT OF CONSISTENCY

***Draft South Dublin County Development Plan 2022-2028*
(including Proposed Material Alterations)**

1.0 INTRODUCTION

This secondary *Statement of Consistency* relates to the *Draft South Dublin County Development Plan 2022-2028*, including the proposed material alterations.

The *Draft South Dublin County Development Plan 2022-2028* ('*Draft Plan*') went on public display on the 7th July 2021 until the 15th September 2021.

Public consultation on the Amendments to the *Draft Plan* began on the 29th March 2022. It is understood that the adopted Plan will come into force 6 weeks after the new Development Plan is made on July 1, 2022.

The likely content of the new County Development Plan has been addressed in this Statement and draws upon the draft wording and associated material alterations that are in the public domain at the time of writing.

We note that while the *South Dublin County Council Development Plan 2016 – 2022* remains in legal effect at the point of the lodgement, we expect that the new County Development Plan 2022-2028 will be adopted when a decision is expected on this planning application by An Bord Pleanála.

This secondary Statement of Consistency assesses the main policies outlined in all chapters of the *Draft Plan*. The proposed scheme is assessed in greater detail against the relevant Development Management standards, as outlined in Chapter 13.

2.0 LOCAL POLICY COMPLIANCE

As discussed, the *South Dublin Draft County Development Plan 2022-2028* (herein referred to as '*Draft Plan*') went on public display on the 7th July 2021.

The Proposed Material Alterations to the *Draft Plan* went on public consultation on the 29th March 2022. All Material Amendments and the associated environmental assessments were available to view online.

This Statement refers to the draft wording and associated material alterations that are in the public domain at the time of writing. For the avoidance of doubt, we note that the as adopted wording of the County Development Plan 2022-2028 is not yet available to the public.

The *South Dublin County Council Development Plan 2016 – 2022* is the current statutory plan for the area (at the time of writing).

2.1 Core Strategy of *Draft Plan*

2.1.1 Core Strategy and Settlement Strategy

The Core Strategy (contained within Section 2.0 of the *Draft Plan*) has informed the overall vision for future development within South Dublin up to 2028. Climate Action is integrated as a central overarching theme for all aspects of the Development Plan, a key element of which is compact growth.

The 'Vision' of the Core Strategy and Settlement Strategy is outlined as follows:

'Maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands.'

Section 2.1 of the *Draft Plan* further states:

*'The promotion of a compact urban form of development is a central part of mitigating climate change. The policies and objectives of this Core Strategy seek to **provide for a consolidated urban form within existing settlements that are integrated with existing and planned public transport and the delivery of social and physical infrastructure.** Such measures set the tone for the delivery of successful and sustainable communities within the County over the lifetime of this Plan and beyond.'* (our emphasis.)

The Core Strategy estimates that there is an overall requirement of 15,576 units between 2022 and 2028. There is a total Land Capacity of 428 ha (excluding Long Term Strategic Lands) with the potential to accommodate 21,490 units.

The parameters within which the Planning Authority frames the Core Strategy are defined within National and Regional planning policy frameworks comprising:

- *Project Ireland 2040: National Planning Framework;*
- *The Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031, including the Dublin Metropolitan Area Strategic Plan, and*
- Section 28 Ministerial Guidelines including Specific Planning Policy Requirements outlined under Section 28(1) of The Act.

Chapter 2 “Core Strategy and Settlement Hierarchy” (Table 9) of the *Draft Plan* outlines the capacity of undeveloped lands within South Dublin and identifies that Templeogue, Walkinstown, Rathfarnham and Firhouse as having 103.38 Ha of lands (greenfield and mixed use) to accommodate 4,836 No. residential units. The proposed development will contribute to the 890 No. units to be accommodated on brownfield, mixed use, lands.

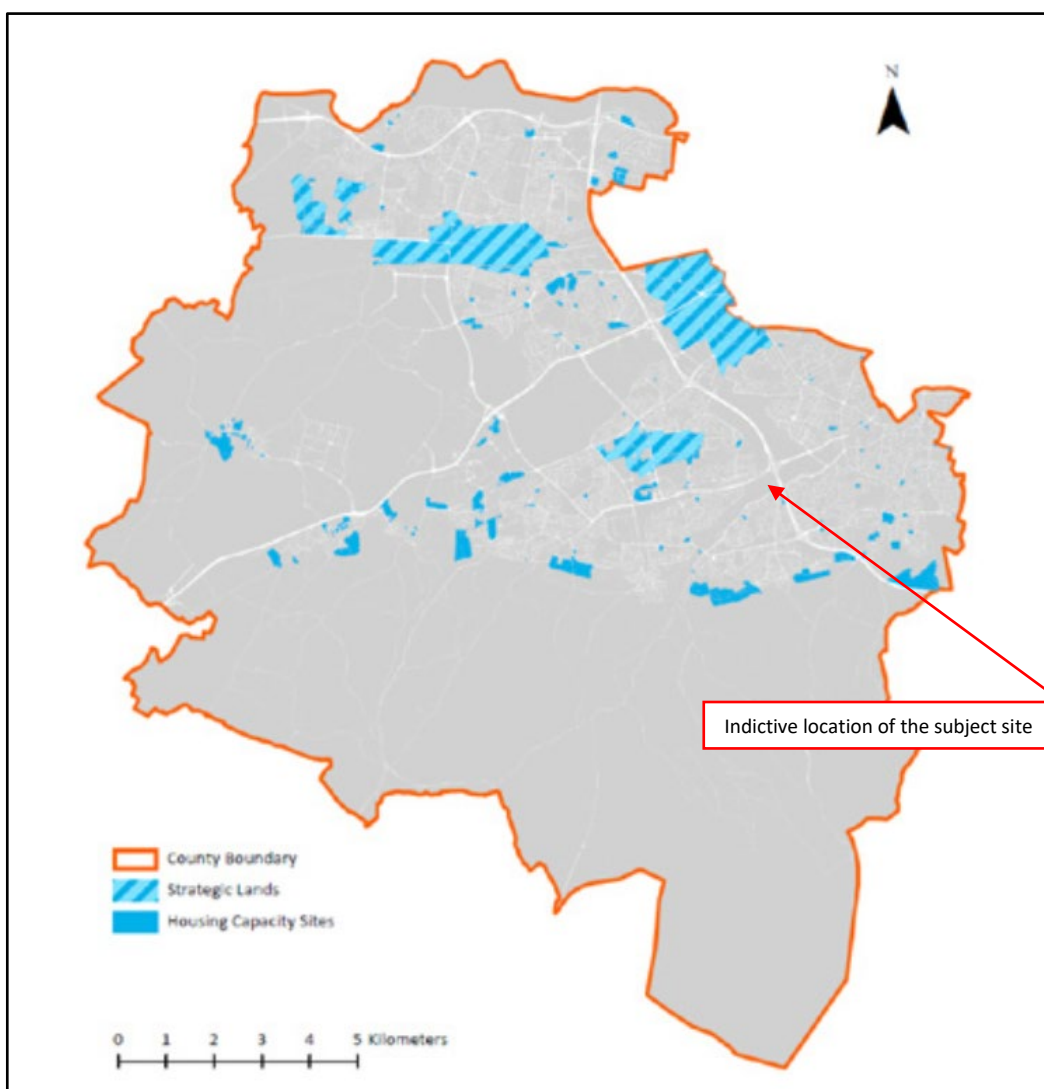


Figure 2.1: The extent of the total housing capacity sites of 42,570 on 990 ha on available already zoned land, with the subject site identified as a ‘Housing Capacity Site’ (source: *Draft Plan*, cropped and annotated by TPA, 2022.)

Section 2.6.5 (Table 11 ‘Core Strategy Table 2022-2028’) sets out the Core Strategy for the Development Plan as shown below:

Settlement Type	Neighbourhood Area / Settlement Name	2016 persons	2016 units & share (%)	Estimated Built 2016 to Q4 2020 and share (%)	Total Land (HA) 2021 - 2028	Total Housing (Units) 2021 - 2028 and share (%)	Total 2028 units and share (%)	Target 2028 persons and share (%)	Population Growth from 2016 persons No. (%)
Dublin City and Suburbs	Tallaght	71,350	24,080 (25%)	700 (12%)	42.54 39.84	2,000 1865 (-11%) (12%)	26,780 (22%)	76,525 (24%)	+5,175 (7%)
	Naas Road City Edge	1,384	396 (0.4%)	15 (0%)	20.02	1,010 (6%)	1,421 (1%)	3,349 (1%)	+1,965 (142%)
	Templeogue, Walkinstown, Rathfarnham, Firhouse	78,166	28,503 (30%)	1,750 (30%)	55.91 50.39	1,953 1677 (-11%) (11%)	32,206 (27%)	85,264 (26%)	+7,098 (9%)
	Clondalkin, Clonburris and Grange Castle	44,500	14,869 (16%)	200 (3%)	122.3 119.78	5,385 5189 (-30%) (33%)	20,454 (17%)	55,206 (17%)	+10,706 (24%)
	Lucan, Adamstown, Palmerstown	59,000	19,069 (20%)	1,625 (28%)	93.83 80.85	3,322 2673 (-19%) (17%)	24,039 (20%)	68,483 (21%)	+9,483 (16%)
	Citywest	8,238	2,503 (3%)	1,164 (20%)	78.52 64.12	2,833 2113 (-16%) (14%)	6,502 (5%)	15,900 (5%)	+7,662 (93%)
Sub-Total		262,638	89,420 (94%)	5,454 (93%)	418 313	16,800 14,517 (-93%) (93%)	111,402 (93.7%)	304,726 (93%)	42,088 (+16%)

Figure 2.2: Extract from Table 11 of the *Draft Plan* inclusive of Material Alterations (cropped and annotated by TPA, 2022.)

Section 2.6.7 ‘Monitoring of Growth / Active Land Management’ of the *Draft Plan* includes the following policy objective:

CS3 Objective 3: *‘To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services. (our emphasis.)’*

‘The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.’

CS4 Objective 2: *‘To promote the delivery of residential development through active land management measures and a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites and under-utilised areas.’*

The subject site in Firhouse measures c. 0.46 ha and is located in a ‘Neighbourhood Area’, alongside Templeogue, Walkinstown and Rathfarnham. The unit allocation for these areas collectively is 1,677 No. units up to 2028. The proposed development includes 100 No. residential units which will contribute to the overall allocation and is highly unlikely to exceed

the allocation for this particular ‘Neighbourhood Area’ given the time at which this planning application is lodged (at the beginning of the lifetime of the new County Development Plan).

The subject site is brownfield in nature and the application seeks to deliver a mixed use, primarily residential, development on underutilised lands which are appropriately zoned LC (Local Centre). The proposed development therefore complies with the above policy objectives.

Section 2.6.8 ‘Employment Lands’ of the *Draft Plan* aims to ensure that sufficient lands are identified for employment purposes at suitable locations, taking proper account of national planning policies. It is estimated that there is a total land capacity of 675 ha to facilitate further employment, of which 58.27 ha are located in Local, Village, District and Town Centres (zoned LC, VC, DC, and TC).

The proposed development includes a mix of uses (café, office, creche, betting office, barber shop and a medical use) which will generate a number of jobs on ‘Local Centre’ zoned lands and therefore complies the following policy objective:

CS5 Objective 3: ‘To support mixed use employment activities in our urban areas in accordance with the settlement and retail hierarchies.’

Section 2.7 ‘Settlement Strategy’ of the *Draft Plan* sets out the function and role of each settlement within South Dublin County. Table 13 ‘RSES Settlement Hierarchy relating to South Dublin County Council’ of the *Draft Plan* identifies that Firhouse is within Dublin City and Suburbs.

Level	Settlement Typology	Description	South Dublin	South Dublin County Neighbourhood Areas
1	Dublin City and Suburbs	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.	Palmerstown, Lucan, Clondalkin, Tallaght,	Naas Road
			Templeogue, Ballyroan, Ballycullen, Ballyboden, Knocklyon, Edmondstown, Firhouse, Ballycullen and parts of Greenhills, Walkinstown, Terenure and Rathfarnham, and Citywest area.	Firhouse / Templeogue / Walkinstown / Rathfarnham
				Tallaght
				Lucan/ Palmerstown (Including Adamstown/ and Environs)
			Clondalkin/ Clonburris/ Grangecastle and Environs	
			Citywest Area within the wider Citywest/Saggart/ Newcastle/Rathcoole NA	

Figure 2.3: Extract from Table 13 ‘RSES Settlement Hierarchy relating to South Dublin County Council’ (Source: *Draft Plan*.)

The *Draft Plan* states:

'In accordance with the principles of sustainable development, and NPO 3b of the NPF; future growth within the County will be prioritised in the Dublin City and Suburbs area first to encourage population growth close to existing and planned employment, services, key transport infrastructure and local amenities. This will ensure a critical mass of people to continue the viability of such services. In this regard, higher densities should be applied to the Dublin City and Suburbs settlement with a graded reduction in the lower level settlements in line with prevailing Ministerial Guidelines.'

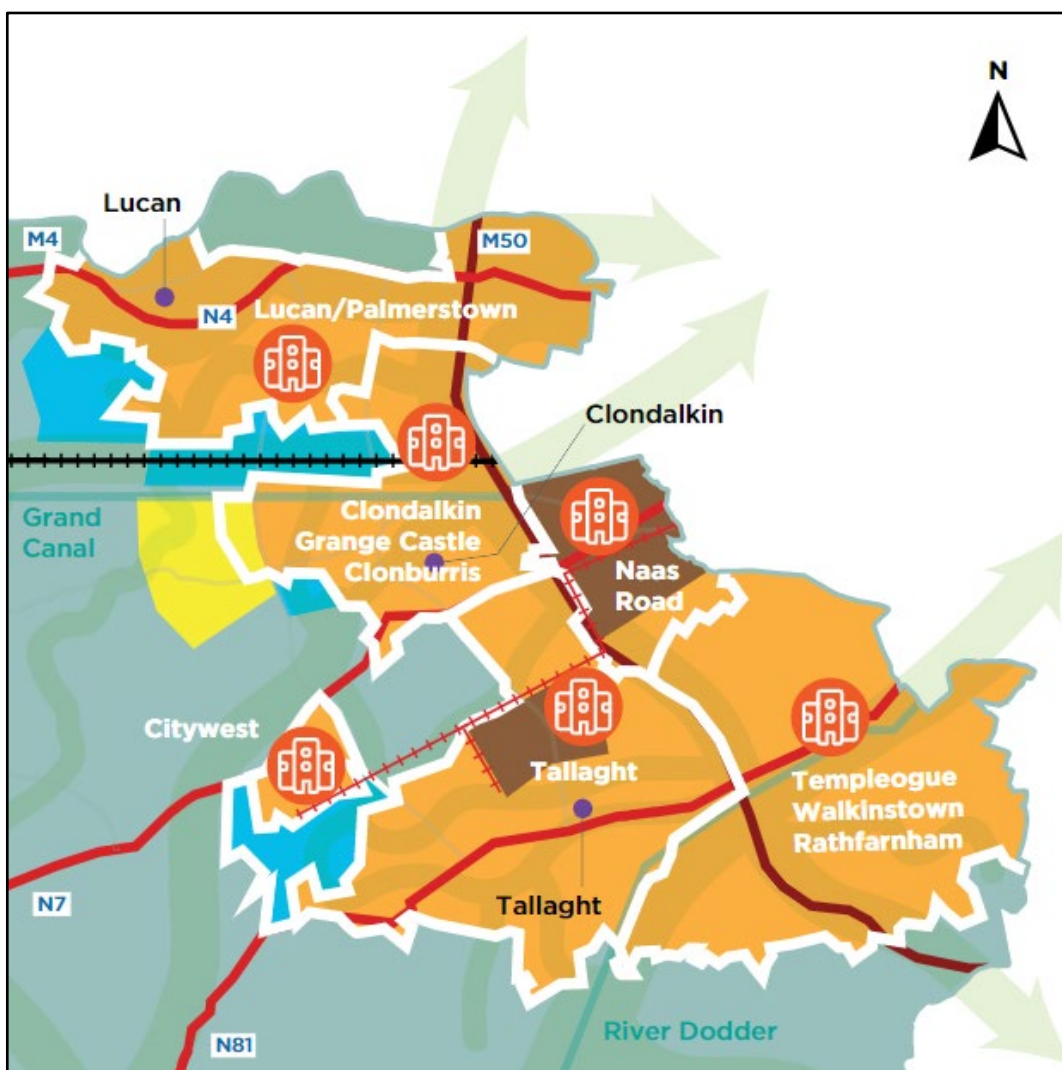


Figure 2.4: Extract of Figure 11 of the *Draft Plan* identifies the Dublin City and Suburbs Settlement Boundary (cropped by TPA, 2022.)

The following policy objectives are relevant:

CS6 Objective 4: *'To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.'* (our emphasis.)

CS6 Objective 5: *'To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally-accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which need them.'* (our emphasis.)

Section 2.7.1 'Dublin City and Suburbs' of the *Draft Plan* refers to 'Wider Dublin City and Suburbs area', in which the subject site is located, and states the following:

'A key component of this Development Plan is to support the consolidation of the key urban areas with more local day to day services focused on the existing villages, district centres and local centres. It is envisaged that the development of the wider settlement area will largely be provided for through infill and brownfield growth....

*As the suburbs of Dublin developed, so new local and district centres were formed, each with their own identity and sense of place supporting the residential areas. Such areas include Knocklyon, Edmondstown, Ballyboden, **Firhouse**, Ballyroan, Ballycullen, and those parts of Greenhills and Walkinstown which are within South Dublin but straddle the County boundary.'* (our emphasis.)

The proposed development will deliver new residential accommodation and commercial uses on an underutilised site that has been zoned as 'Local Centre' for a number of years. The subject site is in close proximity to existing bus services (which will be vastly improved through the delivery of BusConnects), local extensive public parks, local sports clubs and existing schools within the Firhouse/Knocklyon Area.

The Core Strategy of the *Draft Plan* seeks to focus development on suitable strategic nodes along existing or planned public transport corridors. The subject lands comprise a strategically located, underutilised, site within the Dublin Metropolitan area and is identified as being located within the 'Dublin City and Suburbs' settlement boundary and is also in close proximity to Tallaght and is easily accessed via the M50 National Motorway. The proposed residential development will have a gross density of c. 217 units per hectare and will provide an appropriate mix of unit types and sizes, in addition to non-residential uses, high quality open

space and public realm and a childcare facility and is considered to be consistent with the Core Strategy of the *Draft Plan*.

2.1.2 Land Use Zoning Designation and Mapped Objectives

In the *Draft Plan*, the application site is LC (Local Centre) – ‘To protect, improve and provide for the future development of Local Centres.’, as shown in Figure 2.5 below

The southern area of the application site is unzoned and will be reserved for public open space and to gain access to the site, as previously agreed with South Dublin County Council (refer to enclosed Letter of Consent and accompanying drawing).

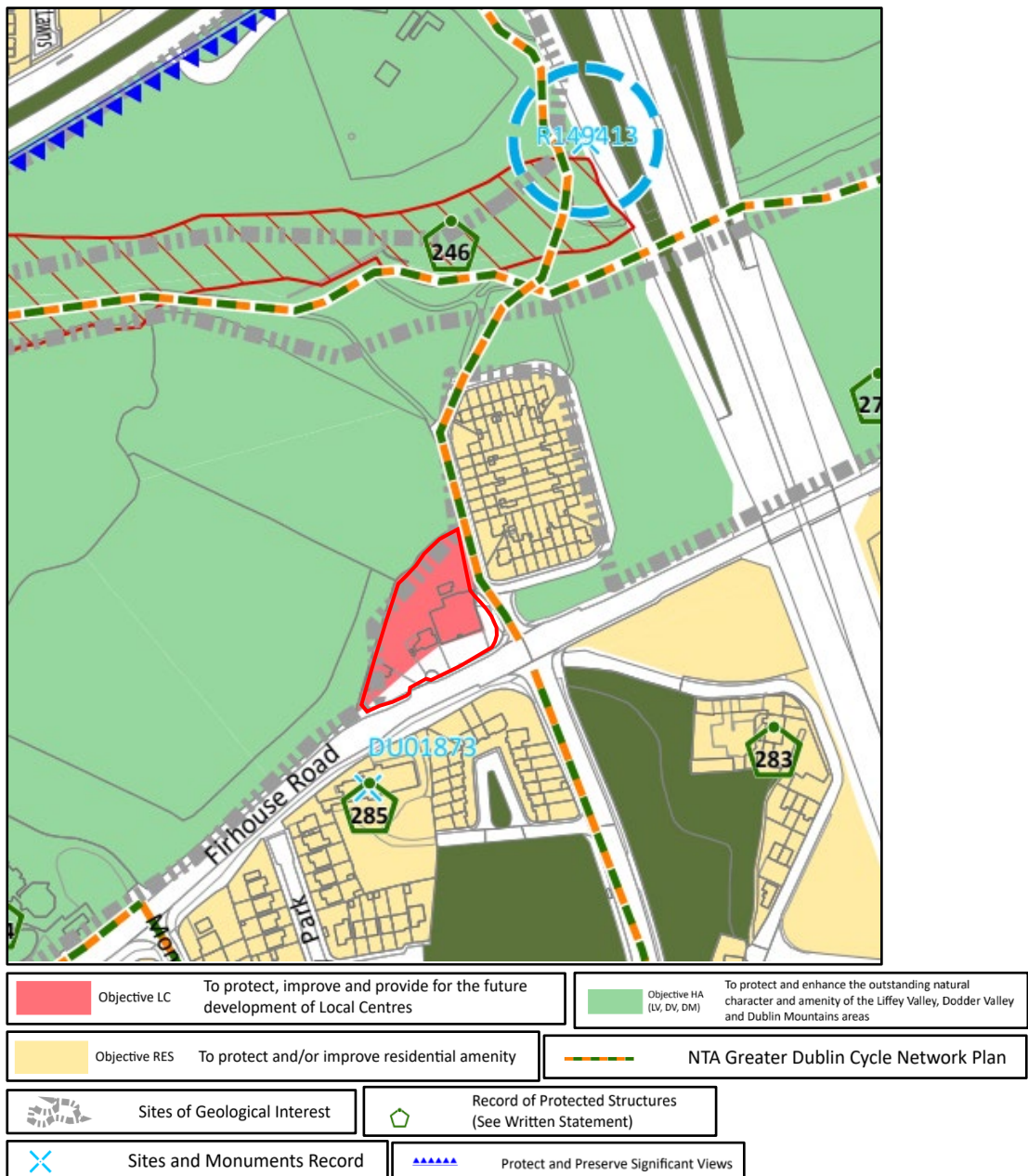


Figure 2.5: Extract from Map No. 9 of the *Draft Plan* which showcases the zoning objectives of the subject site and the wider area and mapped objectives (indicative site boundary in red).

Table 13.9 of the *Draft Plan*, the contents of which are set out in Table 2.1 below outlines ‘Residential’ as being ‘Permitted in Principle’. No Proposed Material Amendments have been proposed to the Local Centre land-use zoning table.

ZONING OBJECTIVE ‘LC’
<i>‘To protect, improve and provide for the future development of Local Centres.’</i>
Permitted in Principle
<i>Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car Park, Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Home Based Economic Activities, Housing for Older People, Live-Work Units, Nursing Home, Offices less than 100 sq.m, Off-Licence, Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential, Residential Institution, Restaurant/Café, Retirement Home, Shop-Local, Shop-Neighbourhood, Social Club, Veterinary Surgery, Work-Live Units.</i>

Table 2.1: Uses permitted in principle for Zoning Objective ‘LC’, with uses proposed as part of the subject application in bold (source: *Draft Plan*, collated by TPA, 2022.)

The non-residential uses proposed as part of the development include: Café (‘*Restaurant/Café*’), Medical (‘*Doctor/Dentist*’), Office (‘*Offices less than 100 sq.m*’), Barber Shop (‘*Shop-Local*’), Bookmakers (‘*Betting Office*’) and a Creche (‘*Childcare Facilities*’). Each of these uses are ‘*Permitted in Principle*’ under the Zoning Objective – LC.

The strategic housing development, inclusive of 100 No. residential units and c. 355 sq m of the above listed non-residential uses accord with land use zoning Objective ‘Local Centre’.

2.1.3 Compliance with Policies of the *Draft South Dublin County Development Plan 2022 - 2028*

It is respectfully submitted that the proposed development is consistent with the policies and objectives of the *Draft Plan* outlined in the tables below.

Table 2.2: Policy objectives in the *Draft Plan* that are applicable to the subject application including responses as required (collated by TPA, 2022.)

Chapter 3 - Natural, Cultural and Built Heritage	
<p>Policy NCBH1: Overarching Protect, conserve and enhance the County’s natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.</p> <p>(NCBH1 Objectives 1 - 3)</p>	<p>The application site is void of any natural features which would support trees and hedgerows and wildlife habitats.</p> <p>Mesh Conservation Architects undertook as survey of the existing buildings on site, and, in their opinion, none of the buildings/structures are of cultural or heritage significance. All buildings on site are largely vacant and in need of extensive</p>

	<p>repair. The barber shop and betting office which currently occupies in the western building will be accommodated within the proposed development.</p> <p>Full consideration has been afforded to the County's Landscape Character Assessment and the County Geological Audit as evidence by the <i>Landscape Architecture Design Rationale + Statement of Response</i> and the <i>Preliminary Environmental Assessment Report</i>, enclosed with this planning application.</p>
<p>Policy NCBH2 Biodiversity Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies</p> <p>(NCBH2 Objectives 1 - 4)</p>	<p>The green open space proposed within the proposed development will serve as 'stepping-stones' within the wider GI network and present opportunities to strengthen GI and biodiversity through SuDS features, and the provision of tree and pollinator-friendly planting.</p>
<p>Policy NCBH3 Natura 2000 Sites Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity</p> <p>(NCBH3 Objective 1 - 3)</p>	<p>The application is accompanied by an <i>Screening for Appropriate Assessment</i> report, prepared by Flynn Furney Environmental Consultants, which, in summary, concludes the proposed development, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites.</p>
<p>Policy NCBH5 Protection of Habitats and Species Outside of Designated Areas Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</p>	<p>An ecological impact assessment was undertaken by Flynn Furney Environmental Consultants and an <i>Environment Impact Assessment</i> (EIA) report is enclosed with this application. The proposed development will support the protection of species and features of biodiversity importance mitigation measures are incorporated into all development proposals.</p>

<p>NCBH5 Objectives 1 and 2</p>	<p>The subject application is on lands zoned LC (Local Centre) adjacent to the Zoning Objective 'HA – DV'. The application is accompanied by an extensive suite of assessment which demonstrates the proposed development will not negatively impact the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley.</p>
<p>Policy NCBH8 Dodder River Valley Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure network.</p> <p>NCBH8 Objective 1 - 5</p>	
<p>Policy NCBH10 Invasive Species Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species</p> <p>NCBH10 Objective 1: To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, applicants should submit a control and management programme with measures to prevent, control and/or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).</p> <p>NCBH10 Objective 2: To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, where notified by members of the public that such species, located on public lands, pose a potential threat to property.</p>	<p>An invasive species survey was undertaken by Flynn Furney Environmental Consultants. No species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011), were found within the boundary.</p> <p>The application is accompanied by an <i>Invasive Species Survey Report</i> which includes biosecurity measures to prevent potential infestation.</p>

<p>Policy NCB12 Geological Sites Maintain the conservation value and seek the sustainable management of the County’s geological heritage resource.</p> <p>NCBH12 Objective 1: To protect identified County Geological Sites from inappropriate development, avoiding potential conflicts with other ecological and cultural assets by engaging in consultation, and to promote the importance and potential of such sites through the County’s Heritage Plan.</p>	<p>An area of geological interest, known as the ‘Dodder Terraces’, is located in close proximity to the site and also straddle the north and western boundaries of the site. The proposed development will not infringe on the geological heritage site.</p> <p>The GSI online mapping service was reviewed by OCSC Consulting Engineers regarding areas of geological interest in the area of the site. The nearest area of geological heritage is the Dodder Terraces (site code SD004) which is located beyond the north and west boundary of the site. The site does not lie within the designated area. For full details, refer to the enclosed <i>Preliminary Environmental Site Assessment</i>, prepared by OCSC Consulting Engineers, which accompanies this application.</p>
<p>Policy NCBH13 Archaeological Heritage Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p> <p>NCB13 Objective 2: To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects.</p> <p>NCBH13 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.</p> <p>NCBH13 Objective 1 – 5</p>	<p>The proposed development has been assessed from an architectural and archaeological perspective.</p> <p><i>An Archaeological Impact Assessment and Method Statement</i>, prepared by AHC Ltd, is enclosed. There are no buildings/structures within the subject site listed as Protected Structures or included in the NIAH registry.</p> <p>Sally Park – House and Gateway (Nursing Home) located c. 35m to the southeast of the application site is included in the NIAH registry (Ref. Ref 11215010) and is a Protected Structure (RPR Ref. 285). Sally Park House is listed as an 18th century dwelling on the Sites and Monuments Record (SMR ref: DU022-103).</p> <p>The <i>Archaeological Impact Assessment and Method Statement</i>, prepared by AHC Ltd., which is enclosed as part of this planning application states:</p> <p><i>‘...the possibility of any physical elements of the RMP site extending into the proposed development area are negligible.</i></p>

	<p><i>Any impacts on Sally Park house are therefore deemed to be indirect, in the form of impacts on the visual amenity. The proposed development will not be visible from the grounds on the south side of the house. The development will be visible from the north side of the house, however, as this is the rear of Sally Park, with the main façade, south-facing, any impacts on the house are deemed only slightly negative.'</i></p> <p>Other Protected Structures in the area include the Carmelite Monastery of the Assumption (RPS Ref. 284) described as Detached Three-Bay Single Storey Former School House, The City Watercourse, Firhouse (RPS Reference 246) which relates to the Mill Race Weir and Sluice (RM).</p> <p><i>A Heritage Impact Assessment, prepared by Mesh Conservation Architects, are enclosed with this application. It is the opinion of the Conservation Architect that '...there is nothing significant about the cottage that would make it significant enough to warrant protection from demolition. Similarly, the former Firhouse Inn pub is not worthy of statutory protection. It has been heavily altered and extended over the decades, and it has minimal architectural or historical significance.'</i></p>
<p>Policy NCBH14 Landscapes Preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.</p>	<p>The subject site is not located in an area deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity. A Landscape Character Baseline Study is included as part of the <i>Landscape Design Rationale + Statement of Response</i>.</p> <p>The application is also accompanied by a <i>Visual Impact Assessment (VIA)</i>, prepared by Doyle & O'Troithigh Landscape Architecture, appraises the visual impacts arising from the</p>

<p>NCBH14 Objective 1: To protect and enhance the unique landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2021).</p> <p>NCBH14 Objective 2: To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2021) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy 2015-2025.</p> <p>NCBH14 Objective 3: To ensure that development respects and reinforces the distinctiveness and uniqueness of the Landscape Character Types and retains important characteristics such as habitats, landform, vernacular heritage and settlement patterns</p> <p>NCBH14 Objective 4: To require a Landscape/Visual Impact Assessment to accompany all planning applications for significant proposals, located within or adjacent to sensitive landscapes and to provide mitigation measures to address any likely negative impacts.</p> <p>NCBH14 Objective 1 – 5</p>	<p>proposed development based on 12 no. views selected by Digital Dimension (see enclosed <i>Verified Photomontages</i> booklet).</p> <p>The assessment notes:</p> <p><i>‘Operational Phase</i></p> <p><i>Consistent and effective maintenance of hard and soft landscape areas, (entrance areas, open space area and walkways) together with quality site and building management are key to avoiding or minimising negative landscape and visual impacts arising from the operation of the proposed development given the location of the site to the south of the Dodder Valley Park</i></p> <p><i>The design and layout of the proposed open space is considered appropriate in terms of its character, zoning, and context. The proposed scheme (Refer to Figure to the Landscape Architects drawings) includes for a series of measures that will ensure a long-term positive impact in areas to the Firhouse Road R114.’</i></p>
<p>Policy NCBH15 Views and Prospects</p> <p>Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.</p> <p>NCBH15 Objective 1: To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or</p>	<p>There is an area zoned to “Protect and Preserve Significant Views”, looking from the N81 across Riverbank Park with views of the Wicklow Mountains.</p> <p>As discussed, verified photomontages prepared by Digital Dimensions include a view of the site from the area designated to ‘Protect and Preserve Significant Views’ (Refer to ‘V10’). With respect to V10, the</p>

<p>interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places and to prevent development which would impede or interfere with Views and / or Prospects.</p> <p>NCBH15 Objective 2: To require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.</p> <p>NCBH15 Objective 1 – 3</p>	<p>LVIA outlines that during the Operational Phase Impacts visual impacts will be ‘Imperceptible neutral long term’.</p>
<p>Policy NCBH19 Protected Structures</p> <p>Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.</p> <p>NCBH19 Objective 1 – 8</p>	<p>As discussed in the enclosed <i>Archaeological Impact Assessment and Method Statement</i>, it is unlikely that the proposed development will affect the setting, special character or appearance of other Protected Structures within the vicinity due to setback distances, the layout, height and design of the scheme, the existence of vegetation along the northern and western site boundaries and the inclusion of generous landscaping proposals along Firhouse Road and Mount Carmel Park.</p>
<p>Policy NCBH21 Vernacular/Traditional and Older Buildings, Estates and Streetscapes</p> <p>Ensure appropriate design of new-build elements and interventions in historic buildings and environments.</p> <p>NCBH21 Objective 1: To retain existing buildings that, while not listed as Protected Structures, are considered to contribute to historic character, local character, visual setting, rural amenity or streetscape value within the County.</p> <p>NCBH21 Objective 4: To ensure that infill development is sympathetic to the architectural interest, character and visual amenity of the area.</p>	<p>Mesh Conservation Architects have advised the following:</p> <p><i>The Firhouse Inn is a much altered pub, probably dating from the first quarter of the 20th century. Many of its features have been removed or covered up with modern renders. This structure was substantially extended to the west after its sale around 1945. The pub is not architecturally or historically significant.</i></p> <p><i>The single storey cottage is a simple artisan style house, dating from the second quarter of the 20th century. It is a simple vernacular structure, last in use as a cafe. It has no particular architectural or historic significance.</i></p>

<p>NCBH21 Objective 5: To encourage the retention and /or reinstatement of the original fabric of our vernacular and historic building stock such as windows, doors, roof coverings, shop and public house fronts and other special features.</p> <p>NCBH21 Objective 1 – 6</p>	<p><i>The group of commercial structures at the south-west corner of the site appear to date from the late 20th or early 21st century, and have no architectural significance.”</i></p> <p>It is proposed to demolish all buildings on site and provide a much needed mixed-use development which comprises 100 No. new housing units on a serviced, brownfield site (which is currently developed yet largely unoccupied) in line with National Planning Policy Objectives.</p>
<p>Policy NCBH24 Adapting and Reusing Historic Buildings Support and encourage the reuse and adaptation of historic, traditional, and older vacant and derelict buildings as a key component of promoting sustainable development and achieving compact growth and as a catalyst for the revitalisation of historic village and town centres.</p> <p>NCBH24 Objective 2: To prohibit demolition or new build, where there are re-use options for historic buildings in order to promote a reduction in carbon footprint.</p>	

Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 3 (Natural, Heritage & Built Heritage).

Chapter 4 - Green Infrastructure	
<p>Policy GI1: Overarching Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.</p> <p>GI1 Objective 3: To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and</p>	<p>Studio Aula have prepared a 'Green Infrastructure Plan' which is submitted as part of this planning application together with a <i>Landscape Design Rationale + Statement of Response</i>. It outlines compliance with Green Infrastructure policies.</p> <p>There is no extant vegetation on the site as it is currently laid out as an impermeable asphalt paved car park and buildings, with no extant planting on the site. However, along the northern/ north-western site boundary of the subject site, a group of mature trees is established in the adjacent site of Dodder Valley Park, comprising a visually prominent and of high public</p>

<p>biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.</p> <p>GI1 Objective 4: To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.</p> <p>GI1 Objective 1 – 8</p>	<p>amenity value (refer to arboricultural documentation, prepared by CM Arn, enclosed with this planning application). The proposed open space, together with its connectivity with the existing open space, particularly to the north of the site, will significantly enhance the green infrastructure network in the local area.</p> <p>All mature tree stands within the adjoining site will not be adversely affected as a result of the proposed development as outlined in the <i>Arboricultural Report</i> which is submitted with this planning application.</p> <p>We further confirm that the planning application is also supported by a full EclA and a <i>Screening for Appropriate Assessment</i> report.</p>
<p>Policy GI2 Biodiversity</p> <p>Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council’s commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the East Region Spatial and Economic Strategy (RSES).</p> <p>GI2 Objective 1: To reduce fragmentation and enhance South Dublin County’s GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.</p>	

<p>GI2 Objective 2: To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.</p> <p>GI2 Objective 6: To continue to support and expand the County Pollinator Plan through the management and monitoring of the County’s pollinator protection sites as part of the Council’s commitment to the provisions of the National Pollinator Plan 2021-2025.</p> <p>GI2 Objective 4: Integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this chapter.</p> <p>GI2 Objective 7: To enhance the biodiversity value of publicly owned hard infrastructure areas by incorporating the planting of new trees, grasses and other species, thereby integrating this infrastructure into the overall GI network.</p> <p>GI2 Objective 1 – 10</p>	
<p>Policy GI3 Sustainable Water Management Protect and enhance the natural, historical, amenity and biodiversity value of the County’s watercourses. Require the long-term management and protection of these watercourses as significant elements of the County’s and Region’s Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate. Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian</p>	<p>We confirm that the planning application is also supported by a full EclA <i>Report</i> and <i>Screening for Appropriate Assessment</i> report.</p> <p>We can confirm the proposed development is not situated proximate to any riparian corridor and this planning application is accompanied by a flood risk assessment (See the enclosed <i>Water Service Report</i> for full details).</p>

<p>corridors and the application of appropriate restrictions to development within these corridors.</p> <p>G13 Objective 1 – G13 Objective 4</p>	
<p>Policy GI4 Sustainable Urban Drainage Systems Require the provision of Sustainable Urban Drainage Systems (SUDS) in the County and maximise the amenity and biodiversity value of these systems.</p> <p>GI4 Objective 1 – 6</p>	<p>Proposed SuDS measure incorporated into the subject development include:</p> <ul style="list-style-type: none"> • Green/Blue roofs to all flat roof areas. • Blue roof system to the Basement Podium at ground floor level. • Infiltration Trenches within the public realm areas to the south and east of the building. • Tree pits and raingarden areas to the public realm areas. • Permeable surface paving and subsurface attenuation layer. <p>Full details on the location of the SuDs features can be found in the enclosed engineering and landscaping packs.</p>
<p>Policy GI5 Climate Resilience Strengthen the County’s GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.</p> <p>GI5 Objective 4 To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq.metres. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirements based on best international standards and the unique features of the County’s GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 13 Implementation and Monitoring, Section 13.3.2).</p>	<p>As discussed, Studio Aula have prepared a ‘Green Infrastructure Plan’ which is submitted as part of this planning application together with a <i>Landscape Design Rationale + Statement of Response</i>. It outlines compliance with Green Infrastructure policies.</p> <p>A hierarchy of open spaces is proposed and will connect with existing open spaces within the surrounding area and will significantly enhance the green infrastructure network.</p>

<p>GI5 Objective 1 - GI5 Objective 7</p>	
<p>Policy GI6 Human Health and Wellbeing Improve the accessibility and recreational amenity of the County’s GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.</p> <p>GI6 Objective 4: To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 Community and Public Open Space of this Development Plan and South Dublin County’s Parks and Open Space Strategy.</p> <p>GI6 Objective 5: To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</p> <p>GI6 Objective 6: To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3 Natural, Cultural and Built Heritage).</p> <p>GI6 Objective 1 - GI6 Objective 10</p>	<p>As discussed previously, the subject site is void of any vegetation and the proposed development will provide large areas of accessible recreational amenity space to be enjoyed by future residents of the scheme and the local community.</p> <p>The landscape design proposes a simple, resilient, and legible streetscape and sequence of open spaces with a clear hierarchy to settle the two buildings into the receiving environment.</p> <p>The proposal includes the planting of primarily indigenous species. Linking of open spaces and recreational areas with planted buffer areas will contribute to extending a ‘green network’ of mosaic spaces, stepping-stones and ecological corridors for wildlife habitat and commuting animals.</p> <p>The design of the public lighting proposed has been carefully considered to ensure bat species within the area are not adversely affected.</p>

Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 4 (Green Infrastructure).

<p>Chapter 5 - Quality Design and Healthy Placemaking</p>	
<p>Policy QDP1 Successful and Sustainable Neighbourhood Support the development of successful and sustainable neighbourhoods that are</p>	<p>The proposed development has been designed in accordance with both the <i>‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’</i> (including the associated</p>

<p>connected to and provide for a range of local services and facilities.</p> <p>QDP1 Objective 1: To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p> <p>QDP1 Objective 2: To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).</p> <p>QDP1 Objective 3: To protect the quality, ambience, vibrancy and vitality of urban centres by promoting an appropriate mix of complementary and compatible day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.</p> <p>QDP1 Objective 4: To reinforce the network of urban centres as the appropriate locations for new mixed-use development, ensuring that the existing context including identified built and natural assets, urban design, integration and potential for connectivity fully informs development.</p> <p>QDP1 Objective 5: To promote the re-development of underutilised Local Centres within the County as new mixed use neighbourhood hubs continuing to provide for local retail and services in a manner which respects and consolidates the existing urban character of these areas ensuring adherence</p>	<p><i>'Urban Design Manual'</i>) and provides an array of facilities to support the new community and provide for the existing community. This includes local retail provision, services and public open space.</p> <p>The proposed development complies with the <i>'Urban Design Manual – A Best Practice Guide'</i> (2009), and the <i>'Design Manual for Urban Roads and Streets'</i> (2013). Transport Insights have prepared DMURS Compliance Statement which forms part of the TTA and is enclosed with this application.</p> <p>The proposed development includes an appropriate mix of complementary and compatible day and evening uses, including commercial, retail and residential uses.</p> <p>The application proposed to re-develop an underutilised site which is zoned LC (Local Centres) with a new mixed use neighbourhood which will provide for local retail and services in a manner which respects and consolidates the existing urban character of the area.</p> <p>OMP Architects have ensured adherence to the eight key design principles in <i>'The Plan Approach'</i> contained within the <i>Draft Plan</i>.</p>
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<p>to the eight key design principles in 'The Plan Approach' including quality of design, integration, accessibility and connections to the surrounding areas.</p> <p>QDP1 Objective 6: To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy towards the delivery of longterm sustainable communities.</p> <p>QDP1 Objective 1 - QDP1 Objective 6</p>	
<p>Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods</p> <p>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.</p> <p>QDP2 Objective 1: To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.</p> <p>QDP2 Objective 2: To ensure that 'The Plan Approach' to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under Section 247 of the Planning & Development Act, 2000, as amended).</p>	<p>As discussed, the Design Team have applied the main principles from the 'The Plan Approach'.</p> <p>The enclosed <i>Architectural Design Statement</i> and <i>Statement of Response</i>, prepared by OMP Architects, demonstrates how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.</p>

<p>QDP2 Objectives 1 and 2</p>	
<p>Policy QDP3 Neighbourhood Context Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.</p> <p>QDP3 Objective 1: To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 Implementation and Monitoring in relation to design statements.</p> <p>QDP3 Objective 6: To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.</p> <p>QDP3 Objective 1 - Objective 9</p>	<p>The proposed development will respond in positive manner to the existing character and setting of the immediate. The taller elements of the proposed will also respect the surrounding context, as illustrated in the enclosed <i>Architectural Design Statement</i> and <i>Statement of Response</i>, prepared by OMP Architects. These documents demonstrate how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.</p>
<p>Policy QDP4 Healthy Placemaking Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.</p> <p>QDP4 Objective 1: To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and</p>	<p>This application is accompanied by detailed architectural plans, which sets out the urban design principles underpinning the overall design approach to the site's re-development. It is also supported by an <i>Architectural Design Statement</i> which details the proposal in design terms and sets out the design rationale for the development.</p>

<p>infrastructure in line with the provisions of NPO 4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES.</p> <p>QDP4 Objective 2: To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.</p> <p>QDP4 Objective 1 and QDP4 Objective 2</p>	
<p>Policy QDP5 Connected Neighbourhoods</p> <p>Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.</p> <p>QDP5 Objective 1: To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure including cycling and walking, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 12 Our Neighbourhoods for further details).</p> <p>QDP5 Objective 1 and QDP5 Objective 2</p>	<p>The proposed development has been designed taking into account guidance set out in the <i>Guidelines on Sustainable Residential Development in Urban Areas (2009)</i> and its companion document <i>Urban Design Manual</i> – the details of which are clearly set out previously within the main <i>Statement of Consistency</i> and the submitted <i>Architectural Design Statement</i> and the submitted <i>Planning Report</i>.</p> <p>The development, its layout and proposed connections to adjoining lands afford future residents' proximate access to services and facilities in the area and promote sustainable modes of transport, primarily pedestrian and cyclist connections through the site to adjoining lands.</p> <p>The proposed development will contribute positively to the creation of new, and the enhancement of the existing public realm which currently comprises primarily hardstanding car park. The public realm proposed will enable the community to enjoy a healthy living environment outdoors but within the boundaries of the site. No design element will downgrade the existing public realm, and will, in contrast, inherently enhance it. A healthy place to live, both mentally and physically The landscaping rationale report provides further with regard to the public realm.</p>
<p>Policy QDP6 Public Realm</p> <p>Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.</p> <p>QDP6 Objective 1: To require that all development proposals, whether in</p>	

<p>established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 13 Implementation and Monitoring - Design Statements and Public Realm).</p> <p>QDP6 Objective 3: To promote and implement environmental and public realm improvements in existing town, village, district and local centres to a high standard and finish to ensure that the design addresses environmental quality, urban design, safety including the potential for anti-social behaviour, identity, and image.</p> <p>QDP6 Objective 6: To ensure that all new developments but particularly apartment developments where gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, both mentally and physically.</p> <p>QDP6 Objective 7: To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height and of a high quality where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge in order to leverage the opportunity to improve the quality of boundary treatments.</p> <p>QDP6 Objective 1 - QDP6 Objective 7</p>	<p>All boundaries are of a similar height and of a high quality where they are bordered by a public footpath.</p>
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<p>Policy QDP7 High Quality Design – Development General Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.</p> <p>QDP7 Objective 1: To actively promote high quality design through the policies and objectives which form ‘The Plan Approach’ to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County’s Building Height and Density Guide.</p> <p>QDP7 Objective 1</p>	<p>The Design Team have applied the main principles from the ‘The Plan Approach’ as outlined in the <i>Draft Plan</i>. OMP Architects have also used the South Dublin County’s Building Height and Density Guide when considering appropriate building heights within the context.</p>
<p>Policy QDP7 High Quality Design – Street Frontage To actively promote well-designed streets and public spaces that provide for active frontages and ‘live’ edges that feel safe, secure and attractive for all to use.</p> <p>QDP7 Objective 2: To actively promote well-designed streets and public spaces that provide for active frontages and ‘live’ edges that feel safe, secure and attractive for all to use.</p> <p>QDP7 Objective 3: To require a high quality of design and finish for new and replacement shopfronts, signage, and advertising, having regard to the requirements set out in Chapter 13 Implementation and Monitoring.</p> <p>QDP7 Objective 2 – QDP7 Objective 4</p>	<p>Active frontages and ‘live’ edges have been provided at ground floor level while the public open space is wholly overlooked and designed to be as welcoming as possible.</p> <p>The design and finishes of the non-residential units are distinctive and of high quality. Signage zones are proposed (see enclosed elevational drawings), and the Applicant is happy to accept a condition which requires that full signage details are to be agreed with the Local Authority (should planning permission be granted.)</p>
<p>Policy QDP7: High Quality Design – Street Width and Height</p> <p>QDP7 Objective 5: To ensure that development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines on Quality Housing for Sustainable Communities, DEHLG</p>	<p>The proposed development has been designed taking into account guidance set out in the <i>Guidelines on Sustainable Residential Development in Urban Areas (2009)</i> and its companion document <i>Urban Design Manual</i> – the details of which are clearly set out previously within the main <i>Statement of Consistency</i> and the</p>

<p>(2007), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), or any superseding guidelines, including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p> <p>QDP7 Objective 6: To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</p> <p>QDP7 Objective 7: To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County’s Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).</p> <p>QDP7 Objective 5 - QDP7 Objective 7</p>	<p>submitted <i>Architectural Design Statement</i> and the submitted <i>Planning Report</i>.</p> <p>A DMURS Compliance Statement forms part of the enclosed TTA and confirms the proposed development is consistent with the principles and guidance of DMURS.</p>
<p>Policy QDP7 High Quality Design – Adaptability and Inclusivity</p> <p>QDP7 Objective 8: To promote and support a Universal Design Approach to residential and non residential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age,</p>	<p>The proposed development has been universally designed to cater to all ages and abilities set out in the submitted <i>Architectural Design Statement</i>.</p>

<p>ability or disability consistent with RPO 9.12 and 9.13 of the RSES. (See also Chapter 8 Community Infrastructure and Open Space.)</p> <p>QDP7 Objective 9: To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin County’s Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide (2009) and the guidance on Lifetime Homes as set out in the Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).</p> <p>QDP7 Objective 11: To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive county.</p> <p>QDP7 Objective 12: To develop a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and/or mobility impairments and based on the principles of universal design.</p> <p>QDP7 Objective 8 - QDP7 Objective 12</p>	<p>The proposed mixed use development comprises is attractive and will contain a variety of housing types and tenures with supporting, public realm and residential amenities.</p> <p>A network of pedestrian footpaths and public spaces are proposed which includes accessible outdoor seating and facilities for people with disabilities and/or mobility impaired.</p>
<p>Policy QDP8 High Quality Design – Building Height and Density Guide (BHDG)</p> <p>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 out in the South Dublin County’s Building Heights and Density Guide 2021.</p>	<p>The <i>Architectural Design Statement</i> provides a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County’s Height and Density Guide.</p> <p>As stated in QDP8 Objective 2, increased building heights on lands zoned Local Centre (LC) are proactively encouraged.</p>

<p>QDP8 Objective 1: To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).</p> <p>QDP8 Objective 2: In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.</p> <p>QDP8 Objective 1 and QDP8 Objective 2</p>	<p>The <i>Architectural Design Statement</i> outlines the overall heights strategy for the proposed development, in particular the transition from the existing established housing on Mount Carmel Park through to Firhouse Road, the design has made sure to satisfy objectives with respect to quality placemaking and contributing to the life of the local community.</p>
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<p>Policy QDP9 High-Quality Design - Building Height and Density Apply a context driven approach to building heights in South Dublin, as supported by South Dublin’s Building Heights and Density Guide.</p> <p>QDP9 Objective 1: To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.</p> <p>QDP9 Objective 1</p>	
<p>Policy QDP10: Mix of Dwelling Types 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.</p> <p>QDP10 Objective 1: To ensure that all new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</p> <p>QDP10 Objective 2: To ensure that our ageing society is catered for in a choice of housing provision having regard to South Dublin Age Friendly County Strategy and Age Friendly Ireland’s Principle and Guidelines for the Planning Authority (2021).</p> <p>QDP10 Objective 1 and QDP10 Objective 2</p>	<p>The proposed development provides a mix of dwelling types that will accommodate a variety of tenures.</p>

<p>Policy QDP11 Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.</p> <p>QDP11 Objective 1 - QDP11 Objective 3</p>	<p>The <i>Architectural Design Statement</i> and <i>Statement of Response</i> outlines a detailed justification for the proposed materials and finishes.</p>
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Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 5 (Quality Design and Healthy Placemaking).

Chapter 6 - Housing	
<p>Policy H1 Housing Strategy and Interim Housing Needs Demand Assessment 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.</p> <p>H1 Objective 2: To require that 20% of lands zoned for residential use, or for a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended).</p> <p>H1 Objective 3: To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.</p>	<p>The Applicant has engaged in consultation with the Housing Section of the Local Authority and has reached agreement on the Part V proposals outlined. The proposed development will provide for 20% social housing as set out in the Part V documentation accompanying this planning application submission, in accordance with the Council’s Housing Strategy and as is required under Part V of the Planning and Development Act, 2000 (as amended).</p> <p>The preliminary agreement is for the transfer of 20 no. units.</p> <p>The Applicant agrees to accept a condition attaching to a grant of planning permission, if An Bord Pleanála is minded to approve the proposed development, which requires the Applicant to enter into a Part V agreement with the Local Authority as per their requirements, prior to the commencement of development. All details relating to Part V are enclosed with this application.</p> <p>A residential density of c. 217 units per hectare. The proposed development inherently complies with the overarching themes of the NPF by proposing a compact well-designed sustainable form of residential development on an</p>

<p>H1 Objective 6: To ensure the selection of land or housing units to purchase or lease by the Council, including Part V, promotes the development of sustainable and mixed income communities.</p> <p>H1 Objective 8: To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries suited to their strategic regional role, subject to good design and development management standards being met.</p> <p>H1 Objective 13: Proposals for residential development shall provide a minimum of 30% 3- bedroom units, a lesser provision may be acceptable where it can be demonstrated that:</p> <ul style="list-style-type: none"> • there are unique site constraints that would prevent such provision; or • that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or • the scheme is a social and/or affordable housing scheme <p>Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).</p> <p>H1 Objective 1 – 19</p>	<p>underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the NPF's aims to consolidate Dublin through the development of underutilised, brownfield sites.</p> <p>The scale and locational characteristics of the subject site, therefore, provides an opportunity for a sustainable, higher density, residential development and the delivery of much-needed housing.</p> <p>The subject site is a small infill brownfield site of c. 0.46 hectares. The proposed development comprises 100 no. apartment units of which 5 no. are 3 bedroom units and this is therefore identified as a material contravention.</p> <p>The <i>Unit Mix Review & Justification Report</i> is enclosed with this planning application notes the significant shortage of good quality modern apartments for sale or rent in South Dublin County Council administrative area.</p> <p>In our opinion, a balance has to be struck between making the most sufficient use of serviced lands in accordance with National Planning Policy objectives and:</p> <ul style="list-style-type: none"> - providing an appropriate mix of uses to comply with the Local Centre zoning; - protecting the west/north boundary wall and mature trees; - protecting the residential amenity of proximate existing houses. - the need to provide an attractive useable open space on Local Authority lands; and - and the need to preserve protected views of the Dublin Mountains.
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	<p>Notwithstanding the above, a <i>Material Contravention Statement</i> accompanies this planning application and demonstrates how An Bord Pleanála is justified to grant permission for the scheme having regard to Section 37(2)(b) of the Planning and Development Act 2000 (as amended).</p>
<p>Policy H2 Supply of Housing Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.</p> <p>H3 Objective 1: To support housing that is designed for older persons and persons with disabilities and/ or mental health issues in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</p> <p>H2 Objective 1 - H2 Objective 5</p>	<p>The housing is designed to accommodate persons of all ages and abilities and the site is proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</p>
<p>Policy H3 Housing for All 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.</p> <p>H3 Objective 1: To support housing that is designed for older people in residential and mixed use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.</p> <p>H3 Objective 1 - H3 Objective 9</p>	

<p>Policy H7</p> <p>Residential Design and Layout</p> <p>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 overall layout and appearance of the development.</p> <p>H7 Objective 1: To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and Chapter 13 Implementation and Monitoring.</p> <p>H7 Objective 2: To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.</p> <p>H7 Objective 3: To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling having regard to the National Transport Authority’s Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</p> <p>H7 Objective 1 - H7 Objective 4</p>	<p>The enclosed <i>Architectural Design Statement</i>, which, <i>inter alia</i>, demonstrates that the layout and residential design of the proposed development conforms with best practice.</p> <p>The proposal incorporates energy efficiency measures and promotes innovation in renewable energy opportunities as demonstrated in the <i>Energy and Sustainability Report</i> which is enclosed with this planning application.</p>
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<p>Policy H8 Public Open Space Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.</p> <p>H8 Objective 1: To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring.</p> <p>H8 Objective 2: To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.</p> <p>H8 Objective 3: To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.</p> <p>H8 Objective 1 - H8 Objective 3</p>	<p>The proposed development includes c. 1,347 sq m (c. 29%) of public open space provision and is therefore in compliance with the minimum public open space standard for residential development on mixed use lands as per Table 8.2 of the <i>Draft Plan</i>.</p> <p>However, we note that Section 8.7.3 of the <i>Draft Plan</i> explicitly states that the overall standard for public open space is 2.4 hectares per 1,000 population and that this should be applied to ‘all’ developments with a residential element.</p> <p>COS5 Objective 6 of the <i>Draft Plan</i> further states:</p> <p><i>‘To require that public open space calculations be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.’</i></p> <p>Using the above calculation method, a minimum of c. 3,840 sq m (or c. 83%) would need to be provided on site.</p> <p>In relation to Section 8.7.4, COS5 Objective 5 further provides the following:</p> <p><i>‘To require the provision of public open space as part of a proposed development site area in accordance with the Public Open Space Standards (minimum) set out in Table 8.2.</i></p> <p><i>The Council has the discretion for the remaining open space requirement to achieve the overall standard of 2.4 ha per 1,000 population, to allow for the provision or upgrading of small parks, local parks and neighbourhood parks outside the development site area, subject to the open space or facilities meeting the open space ‘accessibility from homes’ standards for</i></p>
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	<p><i>each public open space type set out in Table 8.1.</i></p> <p><i>In exceptional circumstances where the provision or upgrade of small parks, local parks and neighbourhood parks is not achievable, the Council has the discretion for the remaining open space requirement to allow provision or upgrade of Regional Parks, to achieve the overall standard of 2.4 ha per 1,000 population, subject to the Regional Park meeting the open space ‘accessibility from homes’ standard set out in Table 8.1.’</i></p> <p>However, we contend that a generous public open space and high quality public realm is provided and the site is within easy walking distance of a Regional Park (Dodder Valley Park), therefore a condition requiring contribution in lieu of the public open space shortfall would be unreasonable.</p>
<p>Policy H9 Private and Semi-Private Open Space Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.</p> <p>H9 Objective 1: To ensure that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13 Implementation and Monitoring.</p> <p>H9 Objective 2: To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.</p>	<p>Further to this, all apartments have access to their own private balconies or terraces and communal open spaces are provided in accordance with the minimum requirements.</p>

<p>H9 Objective 1 and 2</p>	
<p>Policy H10 Internal Residential Accommodation</p> <p>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> <p>H10 Objective 1: To promote the provision of high-quality houses and apartments/duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 13 Implementation and Monitoring.</p> <p>H10 Objective 2: To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity.</p> <p>H10 Objective 3: To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.</p> <p>H10 Objective 1 - H10 Objective 3</p>	<p>The enclosed HQA demonstrates compliance with the relevant standards for apartments. Units are adaptable for future needs and are generously sized to accommodate workspaces here necessary.</p>
<p>Policy H11 Privacy and Security</p> <p>Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</p> <p>H11 Objective 1: To ensure there is a clear definition and delineation between private,</p>	<p>A study to address issues of amenity for existing residents in adjacent dwellings and future occupants of the proposed development has been undertaken and is summarised in the <i>Statement of Response</i>.</p> <p>Contiguous elevation drawings showing the</p>

<p>semiprivate (communal) and the public open spaces that serve residential development.</p> <p>H11 Objective 2: To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.</p> <p>H11 Objective 3: To ensure that private open spaces, where it consists of gardens, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</p> <p>H11 Objective 4: To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.</p> <p>H11 Objective 1 - H11 Objective 4</p>	<p>relationship between the proposed development and adjacent dwellings on all sides have been included with this planning application.</p> <p>There is a clear definition and delineation between private, communal and public open spaces that serve residential development. Private open spaces are screened by robust boundary treatments.</p> <p>Street frontage and passive surveillance of surrounding streets and public realm is maximised.</p> <p>In respect of H11 Objective 4, we highlight that in some instances, the setback distance between opposing upper floor window is not met and we have therefore identified this as a material contravention (refer to the enclosed <i>Material Contravention Statement</i>).</p>
<p>Policy H12 Steep or Varying Topography Sites Ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.</p> <p>H12 Objective 1: To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).</p>	<p>The proposed development is maximum 5 storeys. The building height strategy inherently responds to the topography of the site and the proposed includes transitional building height, as necessary.</p>

<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> <p>H13 Objective 1: To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.</p> <p>H13 Objective 4: To promote and encourage ‘Living-Over-The-Shop’ residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.</p> <p>H13 Objective 5: To ensure that new development in established areas does not unduly impact on the amenities or character of an area.</p> <p>H13 Objective 1 - H13 Objective 7</p>	<p>The application will seek to develop an infill site with a mixed-use, primarily residential development, measuring c. 0.46 hectares in an established area which will utilise existing infrastructure and services.</p> <p>The proposed development provides for an appropriate residential density and has been designed to provide a good level of residential amenity for future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.</p> <p>We note H13 Objective 4 in particular which seeks to promote and encourage ‘Living-Over-The-Shop’ residential uses on the upper floors of appropriate buildings located in Local Centres. The proposal is therefore complies with this policy objective.</p>
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Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 6 (Housing), unless otherwise identified as a material contravention.

Chapter 7 - Sustainable Movement	
<p>Policy SM1</p> <p>Overarching – Transport and Movement</p> <p>Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.</p> <p>SM1 Objective 1: To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car/Van/HGV/Motorcycle).</p> <p>SM1 Objective 1 - SM1 Objective 8</p>	<p>The locational characteristics of the subject site, in the context of public transport accessibility and employment locations, are considered to support the provision of reduced car parking and emphasise sustainable travel. In addition to the location of the lands, the nature and characteristics of the proposed development are considered to encourage and support the use of sustainable modes of transport and minimise reliance on car use, including through the provision of non-residential local services and facilities, the inclusion of a new pedestrian footpath dissecting the site provides enhanced permeability between Firhouse Road and the Dodder Valley Park and integrates with the existing pedestrian and cyclist infrastructure. Further details are contained within the TTA.</p>

<p>Policy SM2 Walking and Cycling Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.</p> <p>SM2 Objective 3: To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas.</p> <p>SM2 Objective 1 - SM2 Objective 17</p>	<p>The Framework Residential Travel Plan, which form part of the TTA, sets out the objectives, mode share targets and a coherent set of Action Plan measures which together comprise the Residential Travel Plan (RTP). The overarching objectives of the Plan is to promote sustainable travel choices (walking, cycling and public transport) and reduce car dependency, car use and car ownership among residents and staff of the development.</p> <p>All green infrastructure proposals are detailed in the <i>Landscape Architecture Design Rationale + Statement of Response</i>, submitted with this planning application.</p>
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<p>Policy SM3 Public Transport – General Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.</p> <p>SM3 Objective 1: To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail.</p> <p>SM3 Objective 3: To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.</p> <p>SM3 Objective 1 - SM3 Objective 10</p>	
<p>Policy SM4: Strategic Road Network</p> <p>SM4 Objective 9: To ensure that all new roads and streets are designed to enhance insofar as feasible, the County’s green infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</p> <p>SM4 Objective 10: To support sustainable measures including car-pooling and car clubs which promote access to cars rather than car ownership and which facilitate higher utilisation of vehicles rather than higher numbers of vehicles.</p> <p>SM4 Objective 1 - SM4 Objective 11</p>	

<p>Policy SM5 Street and Road Design Ensure that streets and roads within the County are designed to balance the needs of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.</p> <p>SM5 Objective 1 - SM5 Objective 5</p>	
<p>Policy SM6 Traffic and Transport Management Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.</p> <p>SM6 Objective 3: To minimise the impact of new development on the County’s road and street network through prioritising active travel and public transport and implementing appropriate traffic and transport management measures.</p> <p>SM6 Objective 8: To require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment.</p> <p>SM6 Objective 1 - SM6 Objective 11</p>	<p>The enclosed TTA has assessed the traffic impact as a result of the proposed development for the year of opening, year of opening +5 years and the year of opening +15 years. The report demonstrates that the proposed development shall have no material impact on the operation of the local road network in all future assessment years. As discussed, a Framework Residential Travel Plan is also enclosed within the TTA.</p>
<p>Policy SM7 Car Parking and EV Charging Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.</p> <p>SM7 Objective 1: To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility.</p>	<p>20% of car parking spaces (i.e. 17 no. spaces) will be equipped to allow for the charging of electric vehicles. All spaces are capable of being upgraded to include electric vehicle charging points as demand increases.</p> <p>8 no. motorcycle parking spaces will also be provided within the basement car park.</p> <p>The use of more sustainable modes of transport is strongly encouraged and the proposal includes a total of 270 no. bicycle parking spaces to serve future residents and the local community.</p>

<p>SM7 Objective 2: To limit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available.</p> <p>SM7 Objective 5: To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</p> <p>SM7 Objective 6: To promote appropriate parking arrangements for specific user requirements including disabled drivers, motorcycles and scooters in town and district centres, public transport nodes and other destinations.</p> <p>SM7 Objective 10: To ensure that parking provision, including the provision of EV charging facilities, does not detract from the comfort and safety of pedestrians and cyclists, visual amenity or the character of an area. (refer also to Chapter 10 Energy).</p> <p>SM7 Objective 1 - SM7 Objective 11</p>	<p>All car parking is proposed at the basement level as the Local Authority’s preference during the pre-application consultation process was to keep the public realm free from car parking where possible.</p>
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Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 7 (Sustainable Movement).

Chapter 8 - Community Infrastructure and Open Space	
<p>Policy COS5 Parks and Public Open Space – Overarching Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County.</p> <p>COS5 Objective 1: To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the</p>	<p>As discussed previously, c. 29% of the total site area is set aside as public open space. This public open space can be identified as ‘Smaller Residential Open Spaces’ as per Table 8.1 of the <i>Draft Plan</i>.</p> <p>Full details on the proposed play spaces can be found in the landscaping drawings and accompanying <i>Landscape Architecture Design Rationale + Statement of Response</i> submitted with this planning application.</p>

<p>overall standard of 2.4ha per 1,000 population.</p> <p>COS5 Objective 19: To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure playspaces and play facilities comply with universal design principles.</p> <p>COS5 Objective 20: To ensure that children’s play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13: Implementation and Monitoring.</p> <p>COS5 Objective 1 - COS5 Objective 18</p> <p>COS5 Objective 4, 5 and 6</p> <p>Play Facilities</p> <p>COS5 Objective 19 - COS5 Objective 18</p>	
<p>Policy COS6 Healthcare Facilities</p> <p>Support the Health Service Executive (HSE) in their aim to provide access to a range of quality health services, in line with Sláinte care and relative to the scale of each settlement and community, and facilitate other statutory and voluntary agencies, and the private sector in the provision of healthcare facilities and services, including the system of hospital care and the provision of community based primary care facilities</p>	<p>A medical unit (c. 59 sq m) is proposed at ground floor level within the proposed development, at a scale which is appropriate to the local centre setting.</p> <p>Full details on the medical unit are contained within the <i>Architectural Design Statement</i> which accompanies this application.</p>

<p>appropriate to the size and scale of each settlement.</p> <p>COS6 Objective 1: To facilitate the development of community-based care including primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with the Development Plan core and settlement strategy, consistent with RPO 9.23 of the RSES.</p> <p>COS6 Objective 3: To support the provision of appropriately scaled healthcare facilities within existing settlements, in locations that are accessible by public transport and safe walking and cycling infrastructure.</p> <p>COS6 Objective 1 - COS6 Objective 4</p>	
<p>Policy COS7 Childcare Facilities</p> <p>Support and facilitate the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee.</p> <p>COS7 Objective 1: To support and facilitate the provision of childcare facilities on well located sites within or close to existing built-up areas, including adjacent to school sites, and within employment areas where the environment is appropriate, making provision to encourage sustainable transport, consistent with NPO 31 of the NPF.</p> <p>COS7 Objective 2: To require provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities (2001) or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places</p>	<p>A crèche (c. 114 sq m) is proposed at lower ground floor level of Block 01 at the northeast and associated outdoor play area to the rear.</p> <p>Full details on the childcare facility are contained within the <i>Architectural Design Statement</i> and the floor plan drawings which accompany this application.</p>

<p>for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity.</p> <p>COS7 Objective 1 - COS7 Objective 6</p>	
<p>Policy COS8 Primary and Post Primary Schools</p> <p>Policy COS8(a): Work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities.</p> <p>Policy COS8(b): Engage with the Department of Education and Skills and support the Department’s School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need.</p>	<p>The enclosed <i>Community and Social Infrastructure Audit</i> is enclosed which outlines that there are 21 No. existing primary schools and 9 No. post primary schools located within c. 2km of the site and elsewhere within the larger Firhouse Area. In addition to this, there were also 3 No. special education facilities operating in the immediate vicinity, including St. Rose’s Special School, Saint Joseph’s Special School and Cheeverstown Special School.</p> <p>The assessment found that the future demand for primary and secondary school places generated by the proposed development (an estimated 51 No. places) will likely be absorbed by the existing schools’ network in the area.</p>

Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 8 (Community Infrastructure and Open Space).

Chapter 9 - Economic Development and Employment	
<p>Policy EDE4 Urban Growth, Regeneration and Placemaking</p> <p>Support urban growth and regeneration through the promotion of good placemaking to attract employees and employers and to provide a competitive advantage to the County and diverse investment opportunity.</p> <p>EDE4 Objective 7: To require that employment space provided as part of new mixed-use development is suitably designed to be a viable workspace to meet the needs</p>	<p>The proposed development includes an office unit (c. 30 sq m) which will serve to accommodate a range of different employment types (e.g. solicitors, accountants etc.).</p> <p>Full details on the office unit are contained within the <i>Architectural Design Statement</i> and the floor plan drawings which accompany this application.</p>

<p>of a broad range of different employment types.</p>	
<p>Policy EDE8 Retail – Overarching Seek to ensure adequate retail provision at suitable locations in the County, having regard to the sequential approach, and protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.</p> <p>EDE8 Objective 3: To support new retail provision in the County to meet the needs of the County’s population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.</p>	<p>The proposed development includes a retail unit (barber shop measuring c. 28 sq m) which will accommodate the tenant of the existing barber shop on the site.</p> <p>Full details on the barber shop are contained within the <i>Architectural Design Statement</i> and the floor plan drawings which accompany this application.</p>
<p>Policy EDE14 Retail - Local Centres Maintain and enhance the retailing function of Local Centres.</p> <p>EDE14 Objective 1: To support the development and enhancement of local centres as sustainable, multifaceted, retail led mixed use centres, enhancing local access to daily retail needs, which do not adversely impact on or draw trade from higher order retail centres.</p>	
<p>Policy EDE17 Retail - Off Licences and Betting Offices Manage the provision of off-licences and betting offices and to prevent an excessive concentration of these land uses.</p> <p>EDE17 Objective 1: To prevent an excessive concentration of off-licence and betting offices in our urban areas.</p>	<p>The site is located within the LC (Local Centre) land zoning objectives whereby ‘Betting Office’ is a ‘Permitted in Principle’ and use. The zoning supports the proposed use subject to other relevant policies and objectives outlined in the <i>Draft Plan</i>.</p> <p>We note that the application seeks for an existing betting office use to cease and to be replaced by a new betting office, albeit in a new building and size on site.</p>

	Therefore, the proposal will not increase the number of betting offices within the area. Further to this, the betting office will also offer to maximise passive and active surveillance of the street frontage and open space alongside the other non-residential uses at ground floor into the evening.
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Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 9 (Economic Development and Employment).

Chapter 10 - Energy	
<p>Policy E2 South Dublin Energy Profile</p> <p>Further develop and implement climate action and energy related initiatives in the County in conjunction with EMRA, the Dublin Energy Agency (Codema), Climate Action Regional Office (CARO) and all relevant stakeholders, promoting energy efficiency and renewable energy measures across the County.</p> <p>E2 Objective 1: To seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development.</p>	<p>As confirmed by the <i>Energy and Sustainability Report</i> enclosed with this planning application, the proposed development will comply with Part L 2021 (NZEB) for residential areas and Part L 2021 (NZEB) for non-residential areas. As part of the development's efforts to further reduce energy consumption, the project is targeting an A2/A3 BER (Building Energy Rating).</p>
<p>Policy E3 Energy Performance in Existing and New Buildings</p> <p>Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.</p> <p>E3 Objective 3: To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building</p>	<p>Extensive work has been carried out to develop a balanced design approach to achieve these onerous targets with a number of sustainable features being incorporated into the design from the early stages.</p> <p>As discussed, 20% of the car parking spaces will have EV charging facilities.</p>

<p>regulations and relevant policy and guidelines.</p> <p>E3 Objective 1 - E2 Objective 4</p>	
<p>Policy E5 Low Carbon District Heating Networks</p> <p>E5 Objective 5: To support the recording and monitoring objectives of the plan by incorporating an 'Energy Assessment Form' into the planning application process providing information relating to energy use within larger developments of over 20 residential units or 3000 sq m commercial or equivalent mixed use to include annual and peak demand for heat and electricity, floor area, BER rating, heating system details, details of renewables on site, EV charging details.</p>	<p>At present there is no Energy Assessment Form available.</p>

Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 10 (Energy).

Chapter 11 - Infrastructure and Environmental Services	
<p>Policy IE2 Water Supply and Wastewater</p> <p>Ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to support growth in jobs over the lifetime of the Development Plan facilitating environmental protection and sustainable growth.</p> <p>IE2 Objective 9: To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system.</p> <p>IE2 Objective 10: To require all development proposals to provide a separate foul and surface water drainage system – where practicable.</p>	<p>Full details on water supply and wastewater infrastructure to serve the proposed development are contained within the <i>Water Services Report</i> which is submitted with this planning application.</p>

<p>Policy IE3 Surface Water and Groundwater Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.</p> <p>IE3 Objective 2: To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in Section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.</p> <p>IE3 Objective 8: Integrate Surface Water and Groundwater systems as an essential component of all new developments, in accordance with the requirements set out in Chapter 13 Implementation and Monitoring and the policies and objectives of this chapter.</p>	<p>Full details on surface water and groundwater management are contained within the <i>Water Services Report</i> which is submitted with this planning application.</p> <p>This planning application is supported by a full suite of engineering proposals to serve the proposed development, including extensive SuDS proposals which are further detailed in the <i>Water Services Report</i> prepared by PHM Consulting.</p> <p>Furthermore, the SuDS proposals are detailed the Landscape Report prepared by Studio Aula, supported by an EclA, prepared by Flynn Furney Environmental Consultants.</p>
<p>Policy IE4 Flood Risk Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.</p> <p>IE4 Objective 1: To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive and Chapter 13 Implementation and Monitoring and the policies and objectives of this chapter.</p>	<p>The flood risk assessment has been carried out in accordance with The Planning System and Flood Risk Assessment Guidelines for Planning Authorities whereby the developed site is shown not to be at significant risk from flooding and to not create a significant risk to adjoining areas or downstream.</p>

<p>IE4 Objective 2: To require all developments in the County to be designed and constructed in accordance with the “Precautionary Principle” detailed in the OPW Guidelines.</p>	
<p>Policy IE7 Environmental Quality Seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation.</p> <p>IE7 Objective 5: To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).</p> <p>IE7 Objective 6: To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas having regard to the Institute of Lighting Engineers’ Guidance Notes for the Reduction of Light Pollution (UK). (see Section 13.9.3 (iii))</p> <p>IE7 Objective 7: To ensure that noise sensitive development in proximity to national and other roads provides a noise impact assessment and includes appropriate mitigation measures, such as noise barriers, set back landscaping and/or buffer zones between areas of land where development is proposed and existing and proposed national and other roads.</p>	<p>The enclosed EclA report gives full consideration to the proposed development from an air and noise pollution and waste management perspective.</p> <p>The enclosed <i>Energy and Sustainability Report</i> which sets out the energy efficiency measures associated with the proposed development, including a district heating system, and electric vehicle parking. Having regard to the above, we conclude that the proposed development aligns with the overarching policy themes contained within the <i>Draft Plan</i>.</p>

Having regard to the above, we confirm that the proposed development complies with the *Draft Plan* policies in respect to Chapter 11 (Infrastructure and Environmental Services).

2.1.4 Neighbourhood Areas

Chapter 12 identifies 7 No. geographical ‘Neighbourhood Areas’ where key services and facilities were found to be common to particular towns/villages and urban centres within the County. In doing so, the *Draft Plan* states that this process has informed and facilitated a more tailored approach to the provision of key services and facilities as each area grows over the plan period. One of the 7 No. Neighbourhood Areas is ‘Templeogue/Walkinstown/Rathfarnham/Firhouse’, within which the subject site at Firhouse Road is located.

The *Draft Plan* states:

*‘The Templeogue / Walkinstown / Rathfarnham / **Firhouse** neighbourhood is located 8km south-west of Dublin City Centre, forming the eastern part of South Dublin County, part of Dublin City suburbs and the wider Metropolitan Area. The lands are defined by the central spine of the River Dodder from west to east and the rural landscape setting along the southern boundary. The M50 motorway weaves through the neighbourhood from south-east to the north. Dublin City Council administrative area is located along the north-eastern Boundary.*

The neighbourhood includes bus transportation links to Dublin City Centre and to Tallaght to the west. Strong neighbourhoods exist in this area crossing administrative boundaries. The eastern Section is an established suburban area in South Dublin County and is characterised by mature residential neighbourhoods including Templeogue, Walkinstown, Rathfarnham and Knocklyon.’ (our emphasis.)

The *Draft Plan* further outlines that the projected population for this area is 85,264 people over the Plan period, a projected growth of 7,098 persons between 2022-2028. The *Draft Plan* supports the consolidation of these key urban areas with more local day-to-day services focused within local centres as the plan strives towards a 10-minute settlement concept.

The proposed development provides 355 sq m of non-residential uses, including a medical facility, childcare facility, café, betting office and a barber shop (retail) each designed to serve the local community in association with the significant residential development proposed. The proposed development conforms with the above and with the land use zoning objective for the lands.

2.1.5 Compliance with the *Draft Development Plan* Development Management Standards

Chapter 13 (Implementation and Monitoring) of the *Draft Plan* sets out the development standards and criteria that seek to ensure development takes place in an orderly and efficient manner. The following development standards are relevant to the proposed development which have been considered under the headings contained within Chapter 13 of the *Draft Plan*:

Landscape Character Assessment (Section 13.2.1)

The *Draft Plan* states that ‘a Landscape Impact Assessment will be required for development proposals in high amenity zones and sensitive landscapes, including proposals that could potentially impact on designated views or prospects.’

The Landscape Character Assessment (LCA) for South Dublin County (Appendix 9 of the *Draft Plan*) identifies five Landscape Character Areas, with the subject site being located in an ‘Urban’ area. Additionally, the LCA also identifies several Landscape Character Types within the County with the subject site being located in an ‘Urban Fringe’.

This enclosed VIA appraises the visual impacts arising from the proposed development. The enclosed *Landscape Design Rationale + Statement of Response*, prepared by Studio Aula, also includes a Landscape Character Baseline Study.

Ecological Protection (Section 13.2.2)

In line with Section 13.2.2 of the *Draft Plan*, the following documents, prepared by Flynn Furney, Environmental Consultants are enclosed with this planning application:

- *An Ecological Impact Assessment Report;*
- *A Bat Survey Report;*
- *A Bird Survey Report;* and
- *An Invasive Species Survey Report.*

Appropriate Assessment (Section 13.2.3)

In line with Section 13.2.3 of the *Draft Plan*, a *Screening for Appropriate Assessment Report*, prepared by Flynn Furney, Environmental Consultants is enclosed.

Environmental Impact Assessment (13.2.4)

In line with Section 13.2.4 of the *Draft Plan*, an *Environmental Impact Assessment (EIA) Screening*, prepared by AWN Consulting is enclosed.

Archaeological Heritage (13.2.5)

In line with Section 13.2.5 of the *Draft Plan*, an *Archaeological Impact Assessment and Method Statement*, prepared by AHC Ltd., is enclosed with this application.

Vernacular and Historic/Older Buildings, Estates and Streetscapes (13.2.8)

A *Heritage Impact Assessment*, prepared by Mesh Conservation Architects, is enclosed with this application.

Green Infrastructure and Development Management (13.3.2)

In line with Section 13.3.2 of the *Draft Plan*, full details on the Green Infrastructure proposed within the development are outlined in the enclosed landscaping drawing pack and *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula.

Universal Design (Section 13.4.1)

In line with Section 13.4.1 of the *Draft Plan*, the application is accompanied by an 'Access Statement' in the form of a *Universal Design Statement* and a detailed *Architectural Design Statement*, prepared by the OMP Architects, which in conjunction with this *Statement of Consistency*, sets out the proposed development's compliance the 12 design criteria set out in the 'Urban Design Manual' (2009) and reflected in the South Dublin County Council's Building Height and Design Guide.

Design Considerations and Statements (Section 13.4.2)

In line with Section 13.4.2 of the *Draft Plan*, the application is accompanied by a statement, prepared by OMP Architects, which details how 'the plan approach' has been taken into consideration and incorporated into the design of the proposed development.

Building Heights and Density (Section 13.4.3)

Section 13.4.3 and QDP8 Objective 1 of the *Draft Plan* provides that all medium to large scale and complex planning applications shall be accompanied by a 'Design Statement' which includes a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).

We note also that South Dublin County's Height and Density Guide states the following:

*'In line with NPO35 and SPPR1, this Guide supports the objective of the Plan to **proactively consider increased building heights on lands zoned Regen, MRC, DC, LC, TC and Res-N as well as sites identified and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018)** where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin Building Height and Density Guide that it is contextually appropriate to do so.'*

Due regard has been given to the Building Height and Density Guide for South Dublin County contained within Appendix 10 of the *Draft Plan*. The proposed development, which has a maximum of 5 storeys is 2.5xCH in the primarily two-storey streetscape.

The enclosed *Architectural Design Statement*, prepared by the OMP Architects, provides a contextual analysis the density and height of the proposed development with reference to the

receiving environment of the proposed development. This should be read in conjunction with this *Statement of Consistency*.

In summary, the proposed residential density of 217 No. units per hectare is appropriate given the need to encourage medium to high density residential development on serviced lands, in close proximity to good quality public transport which also have the benefit of being adjacent to high quality pedestrian and cyclist infrastructure and connections between active and passive recreational areas.

Healthy Placemaking and Public Realm (at Site and Neighbourhood Level (Section 13.4.4 and 13.4.5))

In response to Section 13.4.4 and 13.4.5 of the *Draft Plan*, the application is accompanied by an *Architecture Design Statement* and *Statement of Response*, which demonstrates that a high quality public realm is provided which is welcoming and enhances the urban setting and the character of the area.

Signage (Section 13.4.7)

The proposed development includes a number of signage 'zones' signs on buildings at ground floor level which are proportionate to the scale of the building and will only advertise goods or services that are associated. The advertising signage will be simple in design and integrate with the architectural language of the building.

Should the Board be minded grant planning permission for the subject development, the applicant is happy to accept a condition which requires that full details of the signage will need to be agreed with the Local Authority by way of compliance (should planning permission be granted).

Vacant Site Levy – Residential and Regeneration Lands (Section 13.5.1)

This Section includes the following:

'The following zoned lands are included as lands with the objective of development and renewal of areas in need of regeneration:

- *Objective REGEN (regeneration), and areas in need of regeneration within TC (town centre), DC (District Centre), VC (Village Centre) and LC (Local Centre).*

These lands offer great potential for the significant supply of housing and employment space, as set out in their zoning objectives. Furthermore, the local, town, village and district centre zoned lands are included given their critical role for sustainable neighbourhoods and wider communities.'

The proposed development comprises a significant supply of housing units which are compliment with ground floor employment uses and therefore accords with the above.

Residential Development (Section 13.5)

This Section of the *Draft Plan* sets out a number of development standards which will be considered as part of any new residential proposals. These are listed and responded to below:

Mix of Dwelling Types (Section 13.5.2)

The proposed development provides the following unit mix:

- 2 No. studio units (c. 2%);
- 47 No. 1 bed apartment (incl. duplex) units (c. 47%);
- 46 No. 2 bed apartment (incl. duplex) units (c. 46%); and
- 5 No. 3 bed apartment units (c. 5%).

It is recognised that the proposed development does not include more than 30% 3-bedroom units. Justification for the proposed unit mix is outlined in the demonstrated in the enclosed *Architectural Design Statement*, prepared by OMP Architects .

For reasons discussed previously in this *Statement of Consistency*, in our opinion, the mix of apartment types is appropriate in this instance.

Residential Standards (Section 13.5.4)

As demonstrated in this *Statement of Consistency* and *Quality Housing Assessment (HQA)*, the proposed units have been designed in accordance with the:

- *Quality Housing for Sustainable Communities Guidelines, DEHLG (2007)*,
- *The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*, the companion *Urban Design Manual – A Best Practice Guide, DEHLG (2009)*; and
- *Sustainable Urban Housing: Design Standards for New Apartments (2020)*.

Apartments

We can confirm that all apartments will accord with or exceed the communal open space and floor area standards set out in Table 3.21 of the *Draft Plan* (Figure 2.6 below) and the *Apartments*. The design of schemes fully accords with the minimum standards outlined in the *Apartment Guidelines* in relation to design, internal facilities, aspect, lift/stair cores, communal facilities, refuge storage, bicycle parking and children’s play and amenity spaces. Refer the enclosed HQA, prepared by OMP Architects, for further details.

Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage
Studio	37 sq.m	4 sq.m	4 sq.m	3 sq.m
One bedroom	45 sq.m	5 sq.m	5 sq.m	3 sq.m
Two bedrooms (3 person)	63 sq.m	6 sq.m	6 sq.m	5 sq.m
Two Bedrooms (4 person)	73 sq.m	7 sq.m	7 sq.m	6 sq.m
Three bedrooms (5 person)	90 sq.m	9 sq.m	9 sq.m	9 sq.m

Figure 2.6: Extract from Table 3.21 of the *Draft Plan*

Apartment Size Safeguards

We confirm:

- There are 10 No. 2-bedroom (3 persons) proposed as part of the development, being less than 10% of the total number of units.
- As demonstrated in the enclosed ‘Safeguarding Higher Standards Diagrams’ (Dwg No. 20022-OMP-ZZ-ZZ-DR-A-6002) and the HQA, prepared by OMP Architects, the majority of apartments exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units by a minimum of 10%.

Private Space

We confirm:

- The quantum of private open space the apartments accord with Table 3.21 of the *Draft Plan*.
- The spaces are provided in the form of terraces and balconies and are located to optimise solar orientation and designed to minimise overshadowing and overlooking.
- No balconies overhang onto the public path.
- Balconies are accessed via the main living areas of each apartment.
- All balconies are a minimum depth of 1.5 metres, in one useable length.
- Amenity spaces proposed at ground level incorporate boundary treatments to ensure privacy.
- There is a clear distinction between the communal central open space through the inclusion of appropriate boundary treatments.

Communal / Semi-Private Space

We confirm:

- All communal open spaces are screened from full public view and public access, and restricted through innovative design mechanisms.
- Communal amenity is provided centrally between the two blocks and at roof levels.
- The communal open space is visible from, and accessible to, all units proposed within the scheme.

Internal Storage Standards

We confirm:

- The storage areas are in addition to kitchen presses and bedroom furniture.
- The hot press/boiler space are not counted towards the overall quantum.
- No individual storage room exceeds 3.5 sqm.
- Storage is provided within the apartment units.

Floor to Ceiling Heights

We confirm:

- All ground level apartment floor to ceiling heights are a minimum of 2.7m.

Lift and Stair Cores

We confirm:

- A maximum of 12 No. apartments per floor per staircore is provided.

Separation Distances and Block Layout

The *Draft Plan* outlines that all proposals for apartment development and those over three storeys high should include a minimum clearance distance of circa 22 metres, in general, between opposing window.

The *Draft Plan* includes the following standard in relation to 'Separation Distances and Block Layout':

"...Section 10 of the Urban Design Manual (2009) addresses privacy and amenity and sets out that rather than establishing a minimum window-to-window standard, the aim should be to assess the impact on privacy of each layout and home design based on:

- The site's location and residents' expected levels of privacy
- *The size of the windows – both those overlooking and overlooked*

- *Changes in level between overlooking windows*
- *Ability to screen/partially obscure views through design*

In this regard and as benchmark for development, a minimum clearance distance of circa 22 metres, in general, is required between opposing windows, including in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.

Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy in line with the provisions of the Urban Design Manual as detailed above. In all instances where the benchmark separation distance is not being met, the applicant shall submit a daylight availability analysis for the proposed development and detail appropriate design measures to reduce undue overlooking."

H11 Objective 4 also states:

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

As discussed previously, there are a number of instances where the separation distances between opposing windows, both within and outside of the development, fall below 22 metres and this is therefore identified as a material contravention (refer to the enclosed *Material Contravention Statement*) which is addressed as a material contravention in the enclosed *Material Contravention Statement*.

The *Statement of Response*, prepared by OMP Architects, summarises considerations taken to address issues of amenity for existing residents in adjacent dwellings and future occupants of the proposed development. Contiguous elevation drawings showing the relationship between the proposed development and adjacent dwellings on all sides have been included with the application.

Privacy and Security Considerations

We can confirm:

- The apartment blocks overlook the communal open spaces and public realm.
- All entrance points are clearly indicated, well lit, and overlooked by adjoining and adjacent units.
- All ground floor units are secured. Internal and external communal area can only be accessed by the residents.
- All residential units with direct frontage to the street and ground floor apartment include a privacy strip of at least 1.5 metres in depth.
- The proposed landscape design and boundary treatments have been carefully considered to ensure all units are offered privacy and security.

Dual Aspect

We can confirm:

- 50% of the apartments are dual aspect, which complies with the minimum of 50% for the site.
- Of the single aspect units, no units are north facing
- The enclosed *Daylight & Sunlight Report* confirms all units located on lower floors are not overshadowed.

Sunlight / Daylight

The enclosed *Daylight & Sunlight Report*, prepared by OSCS Consulting Engineers, demonstrates that the development can satisfy the standards set out in the '*Site Layout Planning for Daylight and Sunlight*' (2nd edition): *A Guideline to Good Practice (BRE 2011)* and *BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'*.

Access Cores and Communal Areas

We can confirm:

- All apartment units at street level are provided with their own door access.
- The maximum number of units sharing an access lobby within the proposed scheme is 12.
- The proposed development does not include a projecting external staircase.

Clothes Drying Facilities

Adequately ventilated clothes drying facilities are provided.

Building Lifecycle Report and Management Companies

A *Building Lifecycle Report*, prepared by OMP Architects, accompanies this planning application and includes details on long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application.

Building Design

We can confirm:

- The proposed development incorporates sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations, 2006.
- The proposed development incorporates water saving measures.
- The proposed development includes green/blue roofs which will aid in water absorption and also contribute positively to the environment and visual amenity

Residential Consolidation (Section 13.5.8)

This Section relates to both ‘Infill Sites’, ‘Corner/ Side Garden Sites’ and ‘Dwelling Sub-Division and Upper Floors’. This *Statement of Consistency* and enclosed *Planning Report* confirms that the proposed development complies with the overarching standards relating to residential consolidation as set out in the *Draft Plan*.

Public Open Space (Section 13.5.11)

Public open space shall be provided at the rates specified in Table 13.22 of the *Draft Plan*, shown in Figure 2.7.

Land Use	Public Open Space Standards (Minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area

Figure 2.7: Extract from Table 3.22 of the *Draft Plan*

As discussed previously, c. 29% of the total site is provided as public open space.

The submitted landscaping plans and accompanying *Landscape Architecture Design Rationale + Statement of Response* provides full details on all open spaces and the natural play features included for children’s play. SuDS features are included in the proposed development with a significant quantum of new planting proposed.

Quality of Public Open Space Provision

This Section lists a number of considerations that should be used to guide the provision and design of open spaces under the following headings:

- Access
- Recreation Facilities
- Green Infrastructure, Biodiversity and Sustainable Water Management
- Accessibility
- Safety

This planning application is accompanied by a *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula, which has regard to the guidance in the *Draft Plan* to ensure the public open space is of high quality and useable by all ages and abilities.

Children's Play Areas

We can confirm:

- Children's play areas are provided in the semi-private (communal) and the public open space.
- The publicly accessible children's play area is not proposed to be taken-in-charge, however, should the Local Authority wish to take this in charge, the applicant is happy to accept a condition in this regard (should permission be granted).
- The proposed play spaces are generally based on the principles of natural play.
- All play spaces are easily accessible and overlooked by the apartment units and non-residential units, while not causing a nuisance to nearby residents (see enclosed *Noise Impact Assessment*).
- Suitable provision for teenagers has also been considered as part of the proposal.

The enclosed landscaping plans and accompanying *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula, also includes full details on all play spaces proposed within the development.

Early Childhood Care and Education Facilities

This Section of the *Draft Plan* outlines that 1 No. childcare facility, with a minimum of 20 places for each 75 units, should be provided as part of new residential developments.

The proposed development includes a 114 sq m creche at ground floor level having regard to the requirements of *Child Childcare Facilities, 2001* and Circular Letter PL 3/2016 (DECLG, 2016).

The enclosed *Architectural Design Statement*, prepared by OMP Architects, includes full details on the creche facility proposed.

Healthcare Facilities

This Section of the *Draft Plan* states that all planning applications for health facilities should include full details to allow an understanding of the nature and extent of the proposed development.

The proposed development includes a small 'medical' practitioner which measures c. 59 sqm in total. The enclosed *Architectural Design Statement*, prepared by OMP Architects, includes full details on the medical use proposed.

Retail Development (Section 13.7.3)

This Section of the *Draft Plan* includes a list of criteria for newly proposed retail development, consideration. The application includes a barber shop measuring c. 28 sq m. In our opinion, the scale and form of the retail element proposed is modest and will replace existing retail use (barber shop) on site.

Section 13.7.3 (ii) *Restrictions on Uses of the Draft Plan* states:

- *'The Planning Authority will seek to ensure that the quantum of off-licence and betting offices, particularly within smaller centres, is not disproportionate to the overall size and character of the area and that the development would not have a negative impact on the amenity of the area due to noise, general disturbance, hours of operation and litter. The provision of a small Section of a convenience shop for an ancillary off-licence use is generally acceptable.'*

The zoning objective for the subject site remain as 'Local Centre' in the *Draft Plan* and whereby 'Betting Office' remains a 'Permitted in Principle' use. For reasons outlined in this *Statement of Consistency*, it is in our opinion the proposed betting office at this location is acceptable.

Bicycle Parking/Storage Standards (Section 13.8.1)

Bicycle parking is divided into two categories. Long Term (designed for use by residents and employees and Short Stay (designed for ease of use by the general public).

Table 13.24 of the *Draft Plan* sets out minimum bicycle parking/storage rates for all new development.

Category	Land Use	Long Term	Short Term
Accommodation	Residential Apartment	1 per bedroom	1 per two apartments
Education	Crèche	1 per 5 staff	1 per 10 children
Retail and retail Service	Café Restaurant	1 per 5 staff	1 per 10 seats
	Shop (Barbers)	None specified	None specified
-	Betting Office	None specified	None specified
Medical	Clinics and Group Practices	1 per 5 staff	0.5 per consulting room
Enterprise and Employment	Office	1 per 200 sqm GFA	1 per 200 sqm GFA

Table 2.2 Extracted bicycle parking standards from Table 3.22 of the *Draft Plan*

Please refer to Section 5.5 of the enclosed TTA for further details regarding bicycle parking provision.

Car Parking Standards (Section 13.8.2)

The car parking rates are divided into two main categories Zone 1 and Zone 2.

Zone 2 relates to applications, for both residential and non residential developments, which are proximate to good quality public transport (existing and proposed) and therefore have more restrictive car parking rates.

The proposed development is a brownfield/infill site located within Dublin city and suburbs settlement's boundary and within 400-500 metres of a high-quality bus services (Dublin Bus routes Nos. 75, 75b, 49 and 65b), including proposed services that have proceeded to construction (i.e. Bus Connects) and is therefore classified as being within Zone 2.

Tables 13.25 and 13.26 of the *Draft Plan* set out the 'maximum' car parking rates for non-residential and residential development.

The parking standards for Zone 2 and applicable to the proposed development are as follows:

Category	Land Use	Zone 2
Education	Creche	0.5 per classroom
Retail and retail Service	Café	1 per 20 sqm GFA
	Restaurant	
	Shop (Barbers)	None specified
-	Betting Office	None specified
Medical	Clinics and Group Practices	1.5 per consulting room
Enterprise and Employment	Offices	1 per 75 sqm GFA

Table 2.3 Extracted Car Parking Standards from Table 3.25 of the *Draft Plan*

Category	Land Use	Zone 2 Standard
Apartment Duplex	1 Bed	0.75 spaces
	2 Bed	1 space
	3 Bed	1.25 spaces

Table 2.4 Extracted maximum car parking standards from Table 3.26 of the *Draft Plan*

As discussed previously A total of 80 No. car parking spaces is provided to serve the proposed development at basement level.

Further commentary with regard to the car parking provision and the *Draft Plan* standards is provided within the *Traffic and Transport Assessment*, prepared by Transport Insights.

Car Parking/Charging for Electric Vehicles (EVs) (Section 13.8.3)

There are 17 No. EV charging spaces are provided (i.e. 20% of the total parking spaces provided) as part of the proposed development, with the remainder of the parking spaces being capable of accommodating future charging points, as required.

Further commentary with regard to the car parking provision and the *Draft Plan* standards is provided within the TTA.

Car Parking Design and Layout (Section 13.8.4)

This Section of the *Draft Plan* states that for large commercial developments or residential developments of over 50 dwellings per hectare, large areas of off-street parking will be required as followed. In relation to basement car parks, it is stated:

'Basements: To ensure a safe and secure environment, basement car parks should be well lit and well ventilated. Basement car parks that protrude above the ground level as a street interface will generally not be acceptable in town and village centres due to their visually obtrusive and inactive nature. A protrusion of up to 1.2m may be acceptable in residential areas provided the facade is screened with planting and it does not inhibit levels of passive surveillance from residences or the formation of 'own door' access from the street.'

The proposed basement car park will be safe and secure, well lit and well ventilated in accordance with the above standard.

Traffic and Transport Assessment (Section 13.8.5)

As discussed, a *Traffic and Transport Assessment* (TTA) has been submitted with the application, prepared by Transport Insights.

Travel Plans (Section 13.8.6)

A Framework Residential Travel Plan has been submitted with the application, prepared by Transport Insights, and forms part of the TTA.

Water Management (Section 13.9.1)

Flood Risk Assessment

Though the application site is not located in a flood prone area, this planning application is accompanied by a Flood Risk Assessment, prepared by PHM Consulting, as required by Section 13.9.1(i) of the *Draft Plan*.

Surface Water

The enclosed *Water Services Report*, prepared by PHM Consulting, provides full details on the surface water drainage associated with the proposed development, as required by Section 13.9.1(ii) of the *Draft Plan*.

Sustainable Urban Drainage System (SuDS)

The enclosed *Water Services Report*, prepared by PHM Consulting, provides full details on all Sustainable Urban Drainage System (SuDS) incorporated into the proposed development, as required by Section 13.9.1(iii) of the *Draft Plan*.

Groundwater

The enclosed *Preliminary Environmental Site Assessment*, prepared by OCSC Consulting Engineers, provides full details on the nature and extent of soil and groundwater

contamination and the risks associated with the proposed site development works, as required by Section 13.9.1(iv) of the *Draft Plan*.

Environmental Hazard Management (Section 13.9.3)

With regards to Sections 13.9.3 (i) and 13.9.3 (ii) of the *Draft Plan*, which relate to 'Air Quality' and 'Noise', an EIA screening exercise has been carried by AWN Consulting Engineers and an *Environmental Impact Assessment Screening Report* is enclosed with this application.

Sections 13.9.3 (iii) of the *Draft Plan* relates 'Lighting'. The application is accompanied by a public lighting layout and a *Site Light Report*, prepared by OCSC Consulting Engineers. The enclosed landscape plans, prepared by Studio Aula, and public lighting plan have been co-ordinated to ensure they are practical, viable and compatible. The site lighting proposed has been designed to avoid light spillage, the creation of glare or the emission of light. Additionally, appropriate levels of light and dark is offered throughout the site in response to ecological surveys carried out by Flynn Furney Environmental Consultants.

Waste Management (Section 13.9.4)

Sections 13.9.4 (ii) of the *Draft Plan* includes a list of criteria for the design and siting of waste facilities and bring facilities.

The application is accompanied by an *Operational Waste Management Plan (OWMP)*, prepared by OCSC Consulting Engineers, which provides full details the storage and collection of waste materials proposed as part of the application.

A *Construction and Waste Management Plan (CWMP)*, prepared by PHM Consulting, is also enclosed.

Energy Performance in New Buildings (Section 13.10.1)

This Section of the *Draft Plan* requires that proposals for medium to large scale residential and commercial developments in excess of 10 residential units and / or 1,000 sq. metres of commercial floor space should be accompanied by an Energy Efficiency and Climate Change Adaptation Design Statement.

The application is also supported by an *Energy and Sustainability Report*, prepared by OCSC Consulting Engineers, which sets out the energy efficiency measures associated with the proposed development, including a district heating system, and electric vehicle parking.

3.0 CONCLUSION

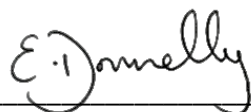
In summary, the proposed development will provide for, inter alia, 100 No. apartments on underutilised, serviced, lands, in an existing urban area in Dublin.

The proposed non-residential uses and public open space will contribute to the Firhouse area from a placemaking perspective, providing a new destination, sensitively stitched into an existing community, for both future occupiers and existing residents.

1. *National Planning Framework (Ireland 2040 – Our Plan);*
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031;*
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009);*
4. *Urban Design Manual: A Best Practice Guide (2009);*
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018);*
6. *Childcare Facilities – Guidelines for Planning Authorities (2001);*
7. *Part V of the Planning and Development Act 2000: Guidelines (2017);*
8. *Design Manual for Urban Roads and Streets (DMURS) (2013);*
9. *Urban Development and Building Heights, Guidelines for Planning Authorities Consultation Draft August (2018);*
10. *The Planning System and Flood Risk Management (2009);*
11. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009);*
12. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);*
13. *South Dublin County Council Development Plan 2016-2022; and*
14. *Draft South Dublin County Development Plan 2022 – 2028.*

In conclusion, we contend that the development of the application site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development.

Yours sincerely



Lizzie Donnelly
Associate
Tom Phillips + Associates