



**ARMSTRONG  
FENTON**  
ASSOCIATES

**PROJECT:** "Clonburris Strategic Development Zone" (SDZ), Dublin 22.

**PLANNING REPORT:** for proposed mixed use & residential development at "Clonburris Urban Centre & Clonburris South-East", Clonburris SDZ.

**CLIENT:** Kelland Homes Ltd

**DATE:** June 2022

Planning &  
Development  
Consultants





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## 1.0. Introduction

- 1.1. This report has been prepared by Armstrong Fenton Associates, Planning Consultants, on behalf of our client Kelland Homes Ltd, who is seeking planning permission for the construction of a mixed use and residential development on a site area of 6.3 hectares (15.5 acres), at a site that lies within the Clonburris Strategic Development Zone (SDZ). The application site is located in the south-eastern section of Clonburris SDZ and forms part of the "Development Areas" of "Clonburris Urban Centre" (CUC) and "Clonburris South-East" (CSE).
- 1.2. The permission being sought, and as per the public notices, is as follows:

**Kelland Homes Ltd seeks permission for development on a site area of 6.3Ha, on lands within the townland of Cappagh, Dublin 22. The proposed development is located west of the Ninth Lock Road, south of the Dublin-Cork railway line, north of Cappaghmore housing estate and Whitton Avenue, and east of an existing carpark / park & ride facility at the Clondalkin Fonthill train station and the R113 (Fonthill Road). The proposed development is located within the Clonburris Strategic Development Zone (SDZ), within part of the development areas of Clonburris Urban Centre (i.e. CUC-S4) and Clonburris South East (i.e. CSE-S1 & CSE-S2), as identified in the Clonburris SDZ Planning Scheme 2019.**

**The proposed development consists of the construction of 294 no. dwellings, crèche and retail / commercial unit, comprised of:**

- 118 no. 2, 3 & 4 bed, 2 storey semi-detached and terraced houses;
- 104 no. 2 & 3 bed duplex units accommodated in 10 no. 3 storey buildings;
- 72 no. 1 & 2 bedroom apartments in 2 no. 4 & 6 storey buildings;
- 1 no. 2 storey crèche (c.520.2m<sup>2</sup>);
- 1 no. 2 storey retail /commercial unit (c.152.1m<sup>2</sup>).

**Access to the development will be via the permitted road network (under Ref. SDZ20A/0021) which provides access from the Ninth Lock Road to the east and the R113 (Fonthill Road) to the west. The proposed development will connect into the permitted infrastructural works as approved under the Clonburris Strategic Development Zone Planning Scheme (2019) and permitted under Ref. SDZ20A/0021, with the proposed development connecting into the permitted surface water drainage attenuation systems i.e. 1 no. pond, 3 no. modular underground storage systems and 1 no. detention basin combined with modular underground storage systems. The proposed wastewater infrastructure will connect into a permitted foul pumping station and pipe network within proposed road corridors to facilitate drainage connections to future wastewater drainage infrastructure within the adjoining SDZ lands (including future Irish Water pumping station permitted under SDZ21A/0006).**

**The proposed development also provides for all associated site development works above and below ground, public & communal open spaces, hard & soft landscaping and boundary treatments, surface car parking, bicycle parking, bin & bicycle storage, public lighting, plant (M&E), utility services & 4 no. ESB sub-stations.**

**This application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015.**



### 1.3. Design Team

This planning application has been prepared by a qualified design team with vast experience in residential development. The design team for the proposed development includes:

- |   |  |
|---|--|
| Armstrong Fenton Associates                 | Planning Consultants                         |
| Davey + Smith Architects                    | Architects                                   |
| Pinnacle Consulting Engineers               | Drainage and Water Services, Internal Roads  |
| Pinnacle Consulting Engineers               | Traffic & Transport Assessment               |
| RMDA Landscape Architects                   | Landscaping Proposals                        |
| Arborist Associates                         | Tree & Hedgerow Survey                       |
| RSK Engineering & Environmental Consultants | Ecology / Appropriate Assessment Screening   |
| Redmond Analytical Management Services      | Public Lighting                              |
| BBSC Building Services                      | Utilities, Electrical and Telecommunications |
| IAC   | Archaeology                                  |



## 2.0. Site Location & Context

- 2.1. The lands subject to this application are located in the townland of Cappagh, within the Clonburris Strategic Development Zone, in Dublin 22. The site is in greenfield condition and is located west of the Ninth Lock Road, south of the Dublin-Cork railway line, north of Cappaghmore housing estate and Whitton Avenue, and east of an existing carpark / park & ride facility at the Clondalkin Fonthill train station and the R113 (Fonthill Road). The proposed development is located within part of the development areas of Clonburris Urban Centre (i.e. CUC-S4) and Clonburris South East (i.e. CSE-S1 & CSE-S2), as identified in the Clonburris SDZ Planning Scheme 2019.
- 2.2. The site is currently zoned Objective SDZ: *"To provide for strategic development in accordance with approved planning schemes"* in the South Dublin County Development Plan 2016-2022. As noted above, Clonburris is designated as a Strategic Development Zone (SDZ) in accordance with Article 5 of SI no 604. South Dublin County Council is recognised as the Development Agency under this Order and have prepared a Planning Scheme for the lands, i.e. the 2019 Clonburris Strategic Development Zone Planning Scheme (hereafter "planning scheme"), which was approved by An Bord Pleanála on 8<sup>th</sup> May 2019.
- 2.3. On 15<sup>th</sup> December 2015, the Government approved the designation of the lands at Balgaddy - Clonburris, as a site for the establishment of an SDZ. Order 2015 (S.I. No. 604 of 2015) established and extended the designated area for the Clonburris SDZ. The Clonburris SDZ Planning Scheme comprises 280 hectares and is located to the west of Dublin City Centre and the M50 - within the triangle between Lucan, Clondalkin and Liffey Valley.
- 2.4. Section 170 of the Planning and Development Act 2000 (as amended) sets out the procedure for planning applications within an SDZ and the following sections of the Act are noted:
- "(2) Subject to the provisions of Part X or Part XAB, or both of those Parts as appropriate, a planning authority shall grant permission in respect of an application for a development in a strategic development zone where it is satisfied that the development, where carried out in accordance with the application or subject to any conditions which the planning authority may attach to a permission, would be consistent with any planning scheme in force for the land in question, and no permission shall be granted for any development which would not be consistent with such a planning scheme.*
- (3) Notwithstanding section 37, no appeal shall lie to the Board against a decision of a planning authority on an application for permission in respect of a development in a strategic development zone.*
- (4) Where the planning authority decides to grant permission for a development in a strategic development zone, the grant shall be deemed to be given on the date of the decision".*
- 2.5. The subsections of the 2000 Act state that were an application is submitted to the Planning Authority, it shall be granted planning permission so long as it complies with the Planning Scheme. Furthermore, there is no right to appeal the Council's decision to An Bord Pleanála.
- 2.6. This current application for permission for development is made in accordance with the aforementioned provisions and compliance with the Planning Scheme is set out in this Planning Report.





Fig. 1 – Aerial view of the subject site, indicatively outlined in red.

### 3.0. Planning History

The following provides details of the relevant, recent planning history attached to the subject site and Clonburris SDZ.

#### 3.1. Ref. SDZ20A/0021 – Roads and Drainage Infrastructure works

On the 12th of August 2021, South Dublin County Council granted permission for development comprising *inter alia*:

- roads and drainage infrastructure works for the future development of the southern half of the overall Strategic Development Zone (SDZ) lands; the roads infrastructure works are for
- the construction of c. 4.0km of a new road, known as Clonburris Southern Link Street,
- a number of vehicular access spurs to facilitate future development of adjoining lands, a total of 8 new junctions (including 3 junctions to facilitate future road developments within the SDZ;
- the drainage infrastructure works include 8 attenuation systems (with outfalls to Griffeen River, Kilmahuddrick Stream and existing storm sewers) including 4 ponds , 2 modular underground storage systems and 2 detention basins combined with modular underground storage systems all adjacent to proposed Clonburris Southern Link Street; surface water drainage culverts to existing watercourses;
- ducting for public electrical services and utilities and the diversion of existing utilities is provided for within the proposed road corridor;

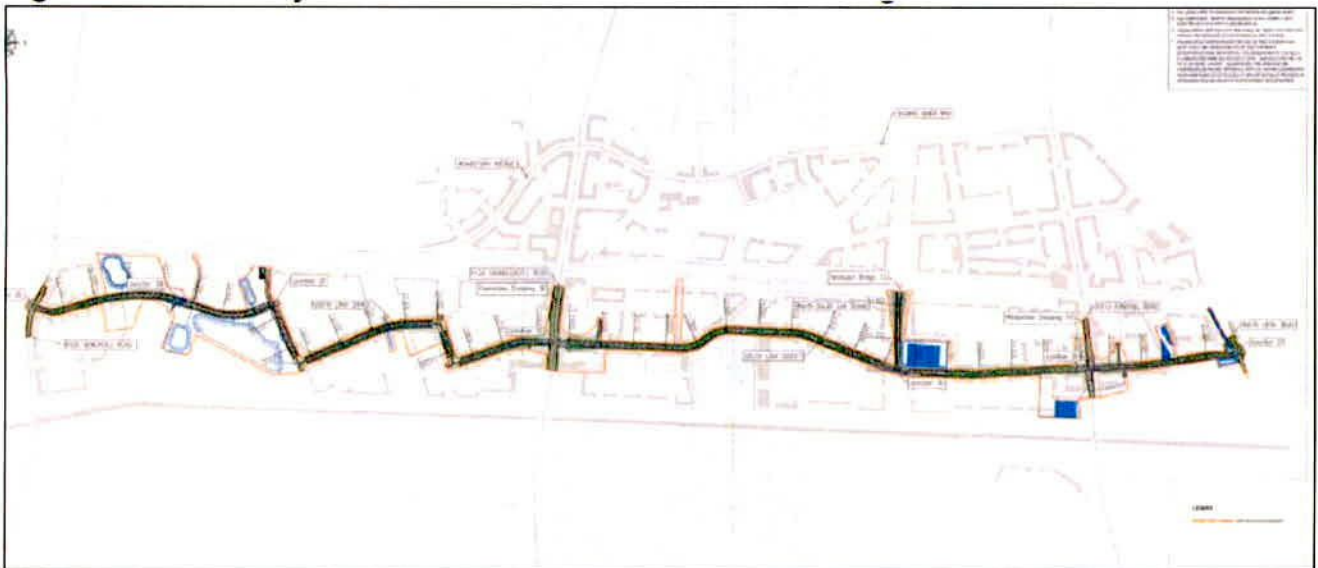


Fig. 2 – Site Layout Ref. SDZ20A/0021 – Roads and Drainage Infrastructure.

As can be seen from Fig. 2 above, the eastern most part of the permitted roads and drainage infrastructure traverses the applicant's lands, and the proposed development will utilise same.

**3.2. Ref. SDZ21A/0022** – Carin Homes Properties Ltd has recently sought permission for the construction of 569 dwellings, a creche, innovation hub and open space in the Clonburris Southwest Development Area of the Clonburris SDZ Planning Scheme 2019, which is the north-west of the subject site, and west of the Fonthill Road. The permission being sought is comprised of 173 houses comprising 8 two bedroom houses, 153 three bedroom houses and 12 four bedroom houses (147 dwellings in CSW-S4 consisting of 8 two bedroom houses, 127 three bedroom houses & 12 four bedroom houses & 26 three bedroom dwellings in CSW-S3), all 2 storey comprising semi-detached,



terraced, end terrace units (with parking and private open space); 148 duplex apartments/apartments (88 in CSW-S4 & 60 in CSW-S3) comprising 74 two bedroom units and 74 three bedroom units, in 16 three storey buildings, 396 apartments in 3 no. 4-6 storey blocks, provision of an innovation hub (626sq.m) and creche (c. 547sq.m) in a part 3/4 storey 'local node' building in CSWS4. Vehicular access will be from the permitted Clonburris Southern Link Street (SDZ20A/0021) and R113 to the east (along with provision of internal haul routes (for construction) to connect to the R136 to the west). Public Open Space/landscaping of c. 4.1 hectares (to include Local Park and MUGA in CSW-S3, Grand Canal Park, along the southern and eastern boundaries of the site to connect to existing Grand Canal towpath) as well as a series of communal open spaces to serve apartments and duplex units (c. 0.39 ha); and all ancillary development works including footpaths, landscaping boundary treatments, public, private open space areas, car parking (656 spaces) and bicycle parking (672 spaces), single storey ESB substations/bike/bin stores, 'Gateway' entrance signage, solar panels at roof level of apartments, and all ancillary site development/construction works. A request for Additional Information (AI) was sought on 4<sup>th</sup> February 2022 and a response to same was submitted to the Planning Authority on 16<sup>th</sup> June 2022. At the time of lodging this current application for permission, a decision has not been made on the aforementioned application – a decision is expected in c. 10<sup>th</sup> August 2022.

**3.3. SDCC Part 8** – South Dublin County Council recently prepared a Part 8 planning application for a proposed social and affordable housing development consisting of 263 no. residential units, on a site area of 10.65Ha, located on lands within the Clonburris SDZ, in the subsector known as Kishogue South West which is located on Lynches Lane to the east of the R136 Outer Ring Road, and is west of the subject application. The proposed residential accommodation consists of 1 No. single storey – two bed semi-detached house, 1 No. single storey – four bed semi-detached house, 65 No. apartments – one bed apartments, 53 No. apartments – two bed apartments, 106 No. two storey – three bed terrace/semi-detached houses, 16 No. Duplex – three bed houses, 15 No. three storey – four bed houses, 6 No. two storey – four bed houses. A Community building and Homework room is also proposed along with site development and landscape works include the provision of 253 No. Parking spaces, 169 No. cycle parking spaces, 3 x ESB substations, high quality amenity spaces including a linear park and community green, landscape works, revised junctions at the entrance to the development from Lynches Lane, SUD's measures and all associated ancillary site development works on a site located on lands within Clonburris SDZ, primarily in the subsector known as Kishogue South West which is located on Lynches Lane to the West of the R136 Outer Ring Road. At the time of lodging this current application for permission, a decision has not been made on the proposed Part 8 social and affordable housing development.

## 4.0. Planning Context

### 4.1. South Dublin County Development Plan 2016-2022

The proposed development site is zoned objective SDZ "To provide for Strategic Development in accordance with the approved Planning Schemes" under the South Dublin County Council Development Plan 2016-2022 (hereafter CDP).

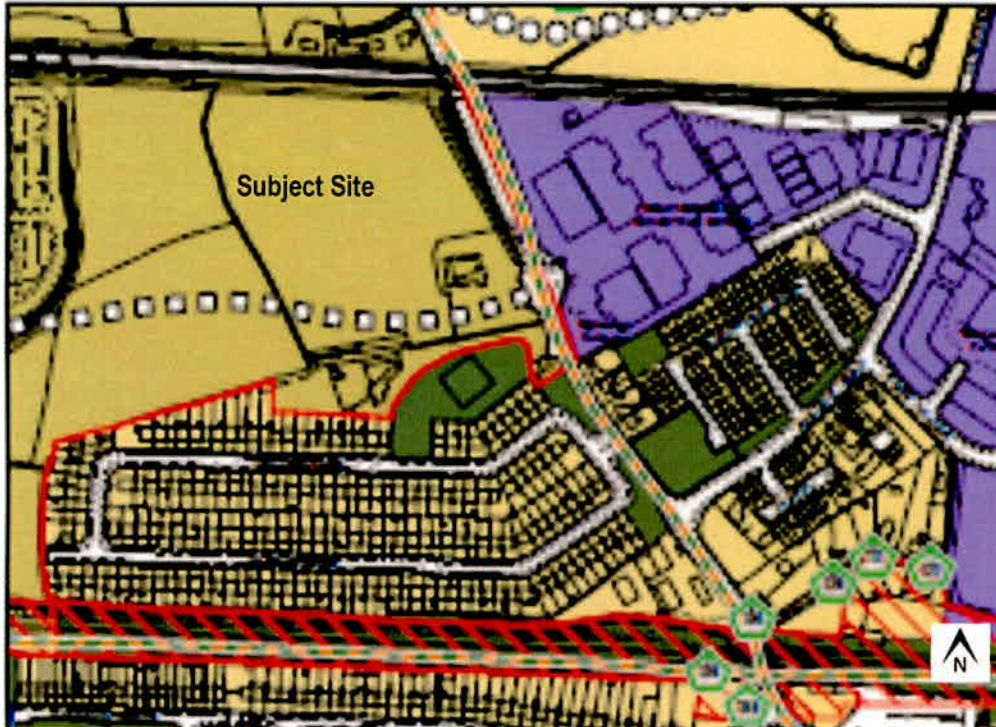


Fig. 3 – Extract from Map 5 of the South Dublin County Development Plan 2016-2022 land use zoning map.

#### Use Zoning Objectives

	Objective RES	To protect and/or improve residential amenity
	Objective RES-N	To provide for new residential communities in accordance with approved area plans
	Objective SDZ	To provide for strategic development in accordance with approved planning schemes

The application site is designated to be part of the Clonburris Strategic Development Zone. Section 169(9) of the Planning and Development Act 2000 (as amended) states:

*(9) A planning scheme made under this section shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded.*

Taking this into account, the Clonburris SDZ Planning Scheme 2019 is the principal planning document in relation to the subject lands and is deemed to form part of the South Dublin County Development Plan. Section 4.2 of this report sets out the requirements of the approved Clonburris Planning Scheme 2019 relevant to the proposed development.

The principle of the construction of residential units on this portion of the SDZ lands is consistent with the Clonburris SDZ Planning Scheme.

The proposal represents the second planning application for residential / commercial development with the SDZ area, aside from the aforementioned Part 8 development. It is considered that the commencement of the build out of the SDZ is in accordance with the Core Strategy of the Development Plan and is therefore acceptable in principle.



The following is a stated policy of the CDP - *CS Policy 7 Strategic Development Zones* - It is the policy of the Council to continue to implement the approved Planning Schemes for Adamstown SDZ and to secure the implementation of an approved Planning Scheme for the Clonburris SDZ.

We also note the following stated objectives of the CDP in relation to Clonburris:

*“CS2 Objective 1: To promote and facilitate urban expansion on designated Strategic Development Zone sites at Adamstown and Clonburris, in tandem with the delivery of high capacity public transport services and subject to an approved Planning Scheme.”*

*CORE STRATEGY (CS) Policy 7 Strategic Development Zones It is the policy of the Council to continue to implement the approved Planning Schemes for Adamstown SDZ and to secure the implementation of an approved Planning Scheme for the Clonburris SDZ.*

Section 1.8.0 notes that the strategic growth nodes at Adamstown and Clonburris (SDZs) offer significant potential for housing and commercial activity and are priority development areas stating that the SDZs are serviced by strategic water, drainage and transport infrastructure. The delivery of sufficient public transport and road capacity shall be actively supported in tandem with future development of the SDZs so as to facilitate sustainable new development in these areas. Internal physical and social infrastructure is required to be delivered in tandem with housing. The future development of these areas is/will be subject to approved Planning Schemes and is dependent on a sustainable delivery model.

Section 2.2 of the CDP states that the Strategic growth nodes at Adamstown and Clonburris SDZs are also priority development areas.

#### **4.2. Clonburris Strategic Development Zone Planning Scheme, 2019**

The draft Clonburris Planning Scheme 2017 was published in September 2017 for public consultation. On the 1<sup>st</sup> of February 2018, the Elected Members resolved to make the Planning Scheme for the Clonburris Strategic Development Zone subject to variations and modifications. The making of the Planning Scheme was subject to a number of appeals to An Bord Pleanála and subsequently an Oral Hearing was held in January 2019. An Bord Pleanála approved the Planning Scheme subject to modifications by Order dated the 8<sup>th</sup> May 2019

The Planning Scheme provides for the establishment of three Character Areas - Clonburris, Kishoge and Adamstown Extension. Clonburris and Kishoge will each focus around an urban centre established at the two points of highest accessibility within the SDZ lands, namely Clondalkin-Fonthill and Kishoge railway stations. Adamstown Extension will extend the community of Adamstown to the south-east and will be separated from Kishoge by parklands.

The development of the entire planning scheme is expected to deliver a target of 8,437 new residential units, a minimum of 7,300 sq.m gross community floor space, approximately 21,520 sq.m gross retail floorspace and between 30,000 and 40,000 sq.m employment floorspace. It is envisaged that the SDZ would support a population of approximately 21,000 people with approximately 2,400 jobs and 6,000 school places. The Scheme also provides for four primary and four post-primary schools.



Fig. 4 – Extract of Figure 1.2 of SDZ Planning Scheme “The SDZ Location”.

Within the Planning Scheme, there are 12 no. “Development Areas” which are further sub-divided into sub-sectors, with the subject site being located in / straddling two Development Areas, i.e. Clonburris Urban Centre (i.e. CUC-S4) and Clonburris South East (i.e. CSE-S1 & CSE-S2).

Development Area	Net Area (Ha.)
Adamstown Extension	9.19
Kishoge Urban Centre	10.94
Kishoge North West	11.16
Kishoge North East	14.36
Kishoge South West	21.55
Kishoge South East	12.50
Clonburris Urban Centre	17.90
Clonburris North West	14.37
Clonburris North East	7.50
Clonburris South West	25.98
Clonburris South East	3.30
Canal Extension	2.27
<b>Total</b>	<b>151.02</b>

Fig. 5 – Extract from Table 2.1.4 “Development Areas” of SDZ Planning Scheme.

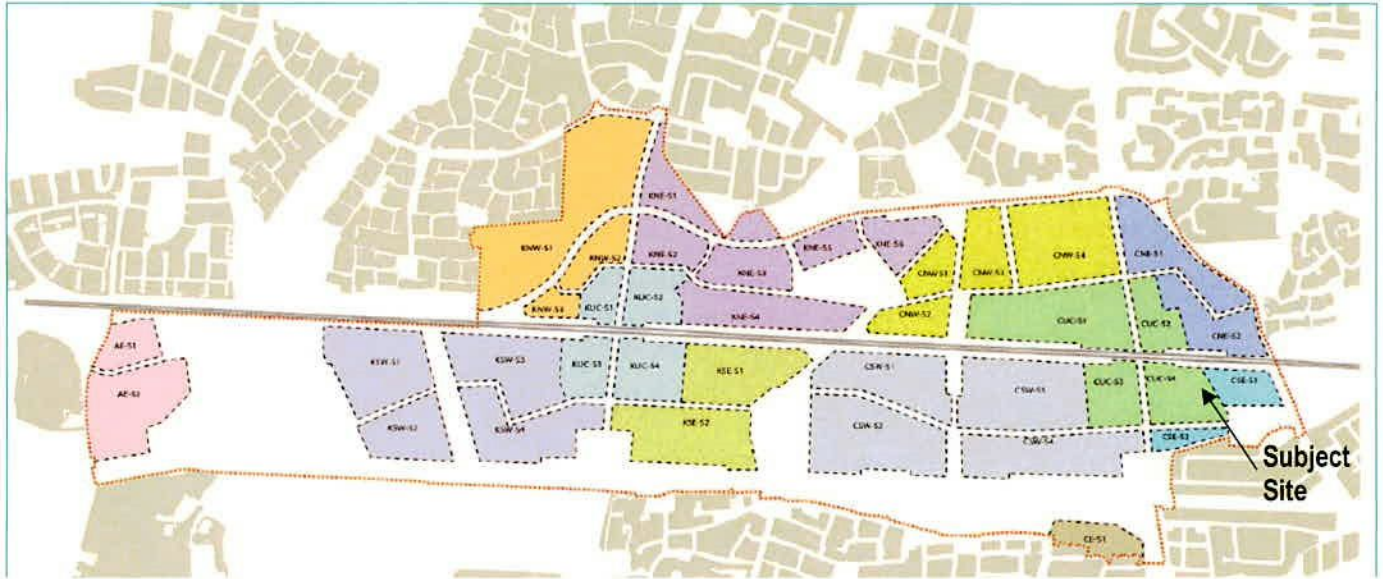


Fig. 6 – Extract from Fig. 2.1.4 “Development Areas and Sub-Sectors Map”.

Development Area	Total Dwelling Units (number)		
	Min	Target	Max
Adamstown Extension	395	442	487
Kishoge Urban Centre	711	1,039	1,368
Kishoge North West	514	566	625
Kishoge North East	667	738	811
Kishoge South West	949	1,059	1164
Kishoge South East	610	678	735
Clonburriss Urban Centre	1,194	1,938	2,686
Clonburriss North West	713	783	856
Clonburriss North East	372	410	447
Clonburriss South West	1,311	1,441	1,569
Clonburriss South East	184	201	217
Canal Extension	110	121	133
<b>Total</b>	<b>7,730</b>	<b>9,416</b>	<b>11,098</b>

Fig. 7 – Extract from Table 2.1.5 “Extent of Residential Development According to Development Area” of SDZ Planning Scheme.

#### 4.2.1. Urban Grain, Building Lines and Street/Road Locations

Figure 2.4.2 of the Planning Scheme identifies ‘Fine Urban Grain’ locations in the Planning Scheme. This diagram also identifies fixed building lines, which largely front to main streets with flexible inner lines between blocks. In certain locations, such as areas identified for urban grain, there is a restriction of maximum building frontages of 10 metres in these locations. The principle of all designated streets within the Planning Scheme is fixed and the alignment of each street including its centre line (i.e. refer to Figure 2.8.5 in Section 2.8 of the Planning Scheme – “Building Centre Line & Urban Grain”) are either fixed or flexible depending on typology. The planned street hierarchy for the SDZ lands is illustrated in Figure 2.2.1. The Arterial Streets and Link Streets are fixed whereas the local streets are flexible.

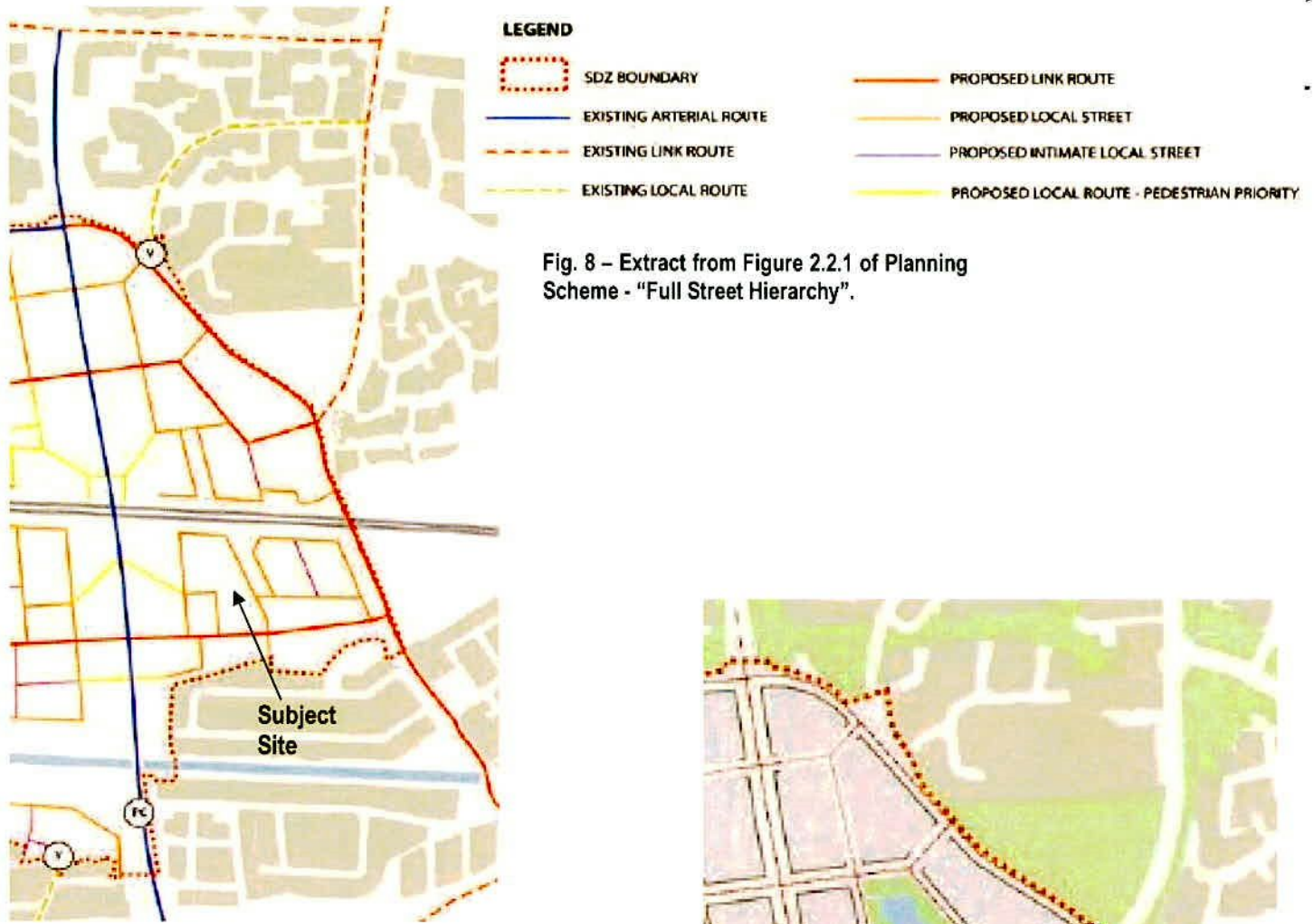
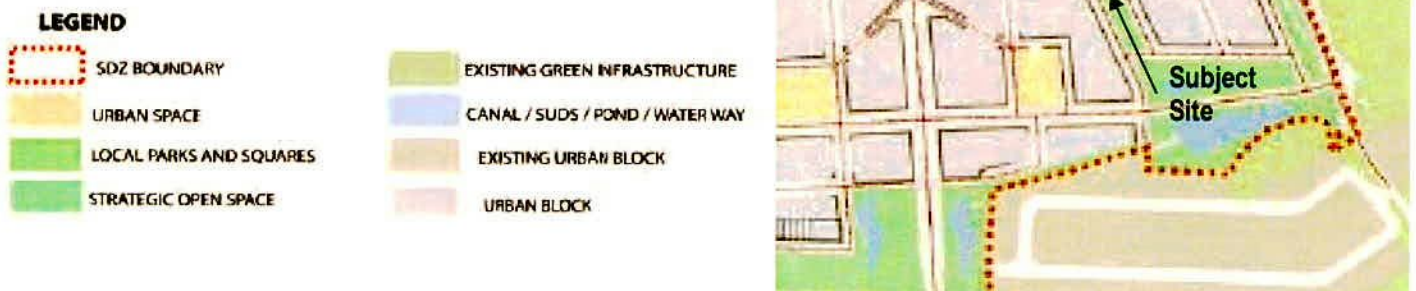


Fig. 8 – Extract from Figure 2.2.1 of Planning Scheme - “Full Street Hierarchy”.

Fig. 9 – Extract from Figure 2.4.2 “Fine Urban Grain Locations in Planning Scheme”.







### 4.2.1.1. Link Streets

The Planning Scheme states that the primary function of Link Streets is to connect the SDZ lands together by connecting Arterial Streets, Urban Centres and Development Areas including local nodes and open spaces. Link Streets are to be designed to provide the main multi-modal spines for movement within the SDZ lands. Link Streets will act as the principal corridors for the movement of pedestrians, cyclists, public transport (local buses) and vehicles within and through the SDZ lands.

The Planning Scheme also states that existing roads that are designated as Link Streets under the Scheme (Lock Road, Griffeen Avenue and the Lucan-Newlands Road) shall be upgraded as traffic calmed streets. These upgraded streets will be augmented by a framework of new Link Streets that will traverse the SDZ lands in the form of east-west streets to the north and south of the rail line together with a connecting north-south Link Street. All Development Areas shall therefore be afforded direct and convenient vehicular, pedestrian and cyclist access to Link Streets. In light of same, the permitted c. 4.0km of a new road, known as Clonburriss Southern Link Street (permitted under Ref. SDZ20A/0021), will traverse our client's lands and facilitate access to the proposed development. This application for permission does not propose alterations to same.

### 4.2.2. Landscaping, Public Open Space, Green Spaces

The Planning Scheme states that the key principles in relation to open space are:

- Provide a hierarchy of high quality and multi-functional open spaces including, strategic spaces, local parks, urban spaces and strategic routes;
- To allow the movement network to connect to and through open spaces by providing safe, well-overlooked and accessible routes;
- To provide appropriate space for health and well-being, required to meet the recreational needs of the new population of Clonburriss through the provision of adequate walking and cycling facilities and a diversity of green spaces for active and passive recreation; and
- Provide recreation facilities and open spaces that are capable of accommodating a range of community sport and recreation needs and use by the community at varying times including after school hours."

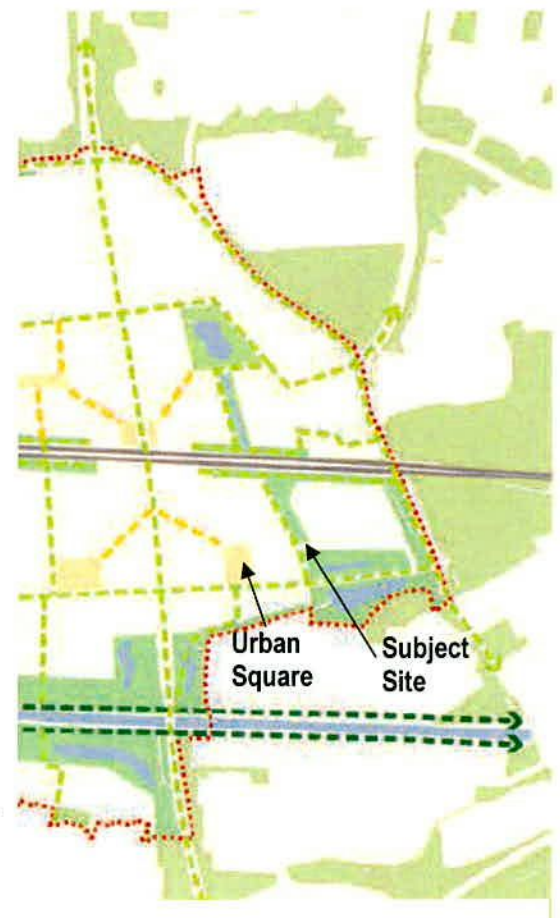


Fig. 10 – Extract from Figure 2.10.1 “Open Space” in Planning Scheme.

LEGEND					
	SDZ BOUNDARY		URBAN SPACES		LOCAL GREEN CORRIDOR
	LOCAL PARKS AND SQUARES		EXISTING GREEN INFRASTRUCTURE		STRATEGIC GREEN CORRIDOR
	STRATEGIC OPEN SPACE		CANAL / SJDS / POND / WATER WAY		LOCAL LINK

The main active outdoor recreation facilities will largely be accommodated in the three main parks on the SDZ lands: the extension to Griffeen Valley Park, Grand Canal Park and Na Cluainte Park, which are all located to the west of the Fonthill Road and not on / adjacent to the subject application site.

The Planning Scheme also provides for a network of urban spaces and squares with five urban squares to be provided as part of the Planning Scheme along with other urban spaces. These squares and spaces are to connect the residential areas into the urban centres of Kishoge and Clonburris. The Planning Scheme provides that they form part of the core urban structure of the lands and will be located in the Clonburris and Kishoge hubs, close to the major transport interchange of Fonthill Railway Station, Kishoge Railway Station and act as focal points for local, district and wider area bus, cycle and pedestrian movement.

The urban squares and spaces are to be designed to the highest quality and are to take into account the quality of materials, the quality and variety of sub spaces within the squares, links into and across the squares and spaces and the maintenance and management of the spaces over time. The urban squares and spaces shall be designed in accordance with the Design Criteria for the landscape elements as set out in Table 2.10.3 of the Planning Scheme, which for the subject site, the following objectives are relevant i.e.

- To provide focal spaces for the urban centres, and the Planning Scheme more generally.
- To provide robust, multi-functional and adaptable design.
- To host a range of activities.
- To provide for a comfortable and inviting space for all users.
- To accommodate evening economy.

#### 4.2.3. Green & Blue Infrastructure



Fig. 11 – Extract from Figure 2.3.1 “Green Infrastructure” in Planning Scheme.

Section 2.3 of the Planning Scheme sets out the following key principles for green and blue infrastructure:

- *To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change;*
- *To retain and improve key landscape and ecological features such as hedgerows, the Grand Canal and the Griffeen River;*
- *To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems;*
- *To reduce fragmentation and strengthen ecological links through the retrofitting and or upgrading of the pedestrian bridge over the railway line to a ‘green bridge’;*
- *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;*



- *To support native plant and animal species and encourage corridors for their movement; and*
- *To seek to retain hedgerows, aquatic habitats and established tree lines wherever possible.*

The Planning Scheme requires that developments on the SDZ lands should identify and protect (where possible) the existing green infrastructure elements on the lands including green open spaces, hedgerows, large trees, watercourses and other natural physical features as these are a strong part of the lands history and will define the character of areas and help to create attractive neighbourhoods.

These blue and green spaces are to take the form of parks, open spaces, constructed wetlands, swales, tree planting, hedgerows, parks, permeable paving, green roofs and a green bridge over the railway line. These spaces will provide for amenity and recreation, biodiversity protection and enhancement, water management and adaption to climate change. In general, the recreation and amenity spaces should all be overlooked by buildings and streets that would provide passive supervision from residents, pedestrians and passing motorists where appropriate.

This application for permission is accompanied by landscaping proposals prepared by RMDA Landscape Architects and a tree and hedgerow survey carried out by Arborist Associates. Please refer to same for further details.

#### **4.2.4. Biodiversity and Natural Heritage**

The Planning Scheme notes that there is in excess of 30 km of hedgerow/treeline habitat within the SDZ lands. The Planning Scheme notes that where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.

We note that the Planning Scheme states that the important hedgerow along the Neilstown / Cappagh boundary should be enhanced and protected and as much as possible of the over thirty kilometres of hedgerow on the SDZ lands should be retained and protected and where these hedgerows cannot be retained, a new hedgerow network composed of the same species shall be planted along roadways within the development.

This application for permission is accompanied by a tree and hedgerow survey that identifies the trees/hedgerows to be retained, protected and removed. The application site is off set from the Neilstown / Cappagh townland boundary with the south-eastern most corner of the application site abutting same but no buildings are proposed in this area. Please refer to the enclosed arborists and landscape architects drawings and reports for details in relation to hedgerows.

#### **4.2.5. Clonburris Urban Centre – Core Retail Area**

The Planning Scheme provides one major retail District Centre at Clonburris Urban Centre, focused on the transport interchange at Fonthill Train Station. For the purposes of retail policy, a Core Retail Area for the Clonburris Urban Centre and Kishoge Urban centres are defined in the Function Map for the Planning Scheme (see Figure 2.5.1).

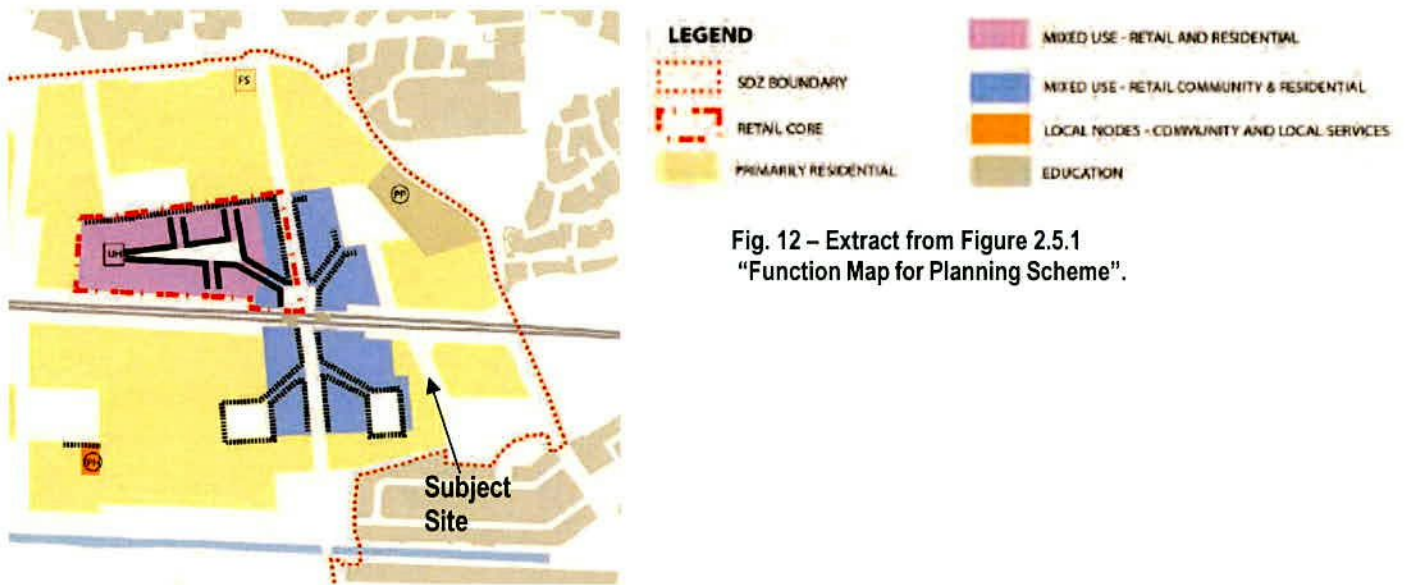


Fig. 12 – Extract from Figure 2.5.1  
“Function Map for Planning Scheme”.

Part of the subject application site lies within the Clonburris Urban Centre (i.e. CUC-S4), which is identified under Figure 2.5.1 of the Planning Scheme as being a “Mixed Use – Retail Community & Residential Area”. It should also be noted that the majority of the mixed use area within CUC-S4 is occupied by the existing park and ride / car park facility associated with the Clondalkin Fonthill train station. The Planning Scheme requires that community, leisure, employment, civic and cultural uses should be provided in addition to retail use in this area. The retail units should be provided principally at ground level in the centre.

#### 4.2.6. Built Form and Design

One of the key principles of the Planning Scheme is to ensure that development is designed in accordance with best practice and promotes identity and diversity between Development Areas. It is a Planning Scheme requirement to: To ensure that development is laid out in a series of blocks and plots that are legible, permeable and human in scale with appropriate topography responses, building heights, street widths, urban grain and street frontages; and To design streets using a more integrated approach to pedestrian, cyclist and vehicular movement and ensure that the movement function of each street is reflected by an appropriate design response and design speed.

The Planning Scheme also requires, in order to ensure coherency and quality in design, that all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ retail services development) shall be accompanied by a Design Statement. The project architects Davey-Smith have prepared the submitted Design Statement – please refer to same.

#### 4.2.7. Archaeology

Section 2.12 of the Planning Scheme deals with Archaeology, with a key principle being to ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process. Section 2.12.3 requires that Applications for development within the SDZ lands should therefore be accompanied by desktop analysis and field survey work carried out by a licensed archaeologist. In accordance with same, IAC Archaeology has prepared the submitted Archaeological Impact Assessment report to study the impact, if any, on the archaeological and historical resource of a proposed residential development

Archaeological testing was carried out over the course of one day on 22<sup>nd</sup> March 2021 using a mechanical excavator fitted with a flat grading bucket. A total of 6 trenches (426 linear metres) were excavated which targeted the remaining



greenfield areas that were not subject to an earlier program of archaeological testing (that was applied to a larger development zone). This program of archaeological testing focused on a smaller development area which represents this planning application. One trench, trench 7 was not excavated as it was within the exclusion zone of an ESB Powerline crossed the site. Archaeological testing revealed no features or deposits of archaeological significance.

It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. Any further mitigation will require approval from the National Monuments Service of the DoHLGH.

#### 4.2.8. Development Areas

Table 2.13.1 of the Planning Scheme provides a summary of the quantitative parameters contained within the Planning Scheme. For the purposes of the subject application, table 1 below shows the relevant targets for the application site.

Development Area	Sub - Sector	Net Area (Ha)	Average Net Density (Low)	Average Net Density (High)	Total No. Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)
Clonburris Urban Centre	CUC-S4	3.82	67	150	258	414	573
Clonburris South East	CSE-S1	2.17	51	61	111	122	132
Clonburris South East	CSE-S2	1.13	65	75	73	79	85

Table 1 – Summary of quantitative parameters contained within the Planning Scheme applicable to the subject site.

Section 2.1.5 of the Planning Scheme sets out the density margins within the Development Areas, and notes that to allow for more accurate management of densities and ensure that higher densities are achieved within appropriate areas, densities under the Planning Scheme are prescribed according to Sub Sector (as Development Areas are divided into Sub Sectors - refer to Figure 2.1.4 of the Planning Scheme and Fig. 6 above). Development within each Sub Sector is to be consistent with the density margins set out in Table 2.1.8 (refer to Fig. 13 below).

According to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.

Residential densities are to be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development).

Development Area	Sub Sector	Net Density Margin per Ha.	
		MIN.	MAX.
Clonburris Urban Centre (CUC)	S1	65	150
	S2	73	150
	S3	65	150
	S4	67	150
Clonburris South East (CSE)	S1	51	61
	S2	65	75

Fig. 13 – Extract from Table 2.1.8 “Density Margin per Sub Sector” of the Planning Scheme.

It can therefore be seen that sub sector CUC-S4 has a density range of 67-150 units per hectare. Sub-sector CSE-S1 has a density range of 51-61 units per hectare and CSE-S2 has a density range of 65-75 units per hectare.

#### 4.2.8.1. Development Area 1 – Clonburris Urban Centre (i.e. CUC-S4)

It should be noted, however, that the subject application site does not occupy all of sub-sector CUC-S4 due to ownership as well as the existing park and ride facility. Approx. 1.7Ha can be discounted from the overall net development area of CUC-S4 which lies outside the application site, thus leaving approx. 2.12Ha of sub-sector CUC-S4 within the application site. As part of the subject application, approx. 143 no. dwellings are proposed in CUC-S4 which equates to a net density of 84 units per hectare which is within the minimum and maximum density range of the Planning Scheme for CUC-S4.

It is also noted that this is the first development proposal within the Clonburris Urban Centre, with further proposals to follow in the future. The Applicant also controls additional lands within Clonburris Urban Centre Development Area, i.e. Sub-Sector CUC-S2 to the north, with further sub-sectors to the west in separate ownership/control, that are likely to be the subject of future planning applications for development.



Fig. 14 – Extract from Figure 3.3.3 “Clonburris Urban Centre” of the Planning Scheme, with part of the subject application site outlined in red.

#### 4.2.8.2. Development Area 2 – Clonburriss South East (i.e. CSE-S1 & CSE-S2)

The application site also lies within the majority of sub-sector CSE-S1 in Clonburriss South East. A strip of approx. 0.17Ha along the eastern boundary of CSE-S1 can be discounted that is outside of the application site (in separate ownership) which leaves a net developable area of approx. 2Ha, upon which it is proposed to deliver 141 no. dwellings, thus producing a net density of 70 units per hectare.

The application site also straddles part of sub-sector CSE-S2 in Clonburriss South East. Approx. 0.4Ha can be discounted from the net developable area of CSE-S2 as it lies outside of the subject application site, thus leaving approx. 1.7Ha of sub-sector CSE-S2 within the application site. Approx. 66 no. dwellings are proposed in CSE-S2 which equates to a net density of 39 units per hectare which is within the min and max density range of the Planning Scheme for CSE-S2.

We note that Table 2.13.1 of the Planning Scheme provides for the following for Clonburriss South East, i.e. CSE-S1 and CSE-S2 combined:

- Total dwellings (low margin) – 184
- Total dwellings (high margin) – 217
- Total dwellings (target) - 201

The proposed development in Clonburriss South East i.e. sub-sectors CSE-S1 and CSE-S2 combined, provides for 207 no. dwellings which meets the target dwelling numbers for this Development Area as set out in the Planning Scheme.



Fig. 15 – Extract from Figure 3.3.5 “Clonburriss South East” of the Planning Scheme, within part of the subject application site outlined in red – located in sub-sectors CSE-S1 and CSE-S2.



## 5.0. Pre-Planning Consultation

- 5.1. A Section 247 pre-planning consultation regarding the proposed development was held with South Dublin County Council (SDCC) under pre-planning Ref. PPSDZC05/20 on the 18<sup>th</sup> December 2020. This meeting was held online via Microsoft Teams due to the Covid-19 pandemic.

In attendance at the meeting were Sarah Watson, Tracy McGibbon and Eoin Burke of SDCC's Planning Department, in addition to other members of the Local Authority's various Departments (Roads, Drainage, Landscaping Sections). The project's planning consultants, architects, engineering and landscaping consultants were all represented at the meeting, in addition to the applicant.

It should be noted that the applicant's design team consulted with the Planning Authority on a number of occasions over the past two years, both formally and informally, however, the above meeting was the last formal pre-planning consultation held between the project design team and SDCC.

- 5.2. Pre-planning discussions centred around the general layout of the proposed scheme, proposed density and building heights, the requirements of the Clonburris Strategic Development Zone Planning Scheme 2019 to with regard density and building heights as well as the protection of hedgerows, provision of public open space, attenuation provision, road access and pedestrian / cyclist permeability. The alignment of the approved Main Link Road which traverses the subject site in an east-west direction was also a key consideration throughout the pre-planning / design process.
- 5.3. The outcome of pre-planning discussions have been carefully considered in the final design now put forward for permission and it is considered that the proposed development caters for a sustainable new neighbourhood which achieves the vision and objectives of the Clonburris Strategic Development Zone Planning Scheme 2019.





## 6.0. Proposed Development

6.1. The development that we now seek permission for, and as described in the public notices, is as follows:

Kelland Homes Ltd. intends to apply for permission for development on a site area of 6.3Ha, on lands within the townland of Cappagh, Dublin 22. The proposed development is located west of the Ninth Lock Road, south of the Dublin-Cork railway line, north of Cappaghmore housing estate and Whitton Avenue, and east of an existing carpark / park & ride facility at the Clondalkin Fonthill train station and the R113 (Fonthill Road). The proposed development is located within the Clonburris Strategic Development Zone (SDZ), within part of the development areas of Clonburris Urban Centre (i.e. CUC-S4) and Clonburris South East (i.e. CSE-S1 & CSE-S2), as identified in the Clonburris SDZ Planning Scheme 2019.

The proposed development consists of the construction of 294 no. dwellings, crèche and retail / commercial unit, comprised of:

- 118 no. 2, 3 & 4 bed, 2 storey semi-detached and terraced houses;
- 104 no. 2 & 3 bed duplex units accommodated in 10 no. 3 storey buildings;
- 72 no. 1 & 2 bedroom apartments in 2 no. 4 & 6 storey buildings;
- 1 no. 2 storey creche (c.520.2m<sup>2</sup>);
- 1 no. 2 storey retail /commercial unit (c.152.1m<sup>2</sup>).

Access to the development will be via the permitted road network (under Ref. SDZ20A/0021) which provides access from the Ninth Lock Road to the east and the R113 (Fonthill Road) to the west. The proposed development will connect into the permitted infrastructural works as approved under the Clonburris Strategic Development Zone Planning Scheme (2019) and permitted under Ref. SDZ20A/0021, with the proposed development connecting into the permitted surface water drainage attenuation systems i.e. 1 no. pond, 3 no. modular underground storage systems and 1 no. detention basin combined with modular underground storage systems. The proposed wastewater infrastructure will connect into a permitted foul pumping station and pipe network within proposed road corridors to facilitate drainage connections to future wastewater drainage infrastructure within the adjoining SDZ lands (including future Irish Water pumping station permitted under SDZ21A/0006).

The proposed development also provides for all associated site development works above and below ground, public & communal open spaces, hard & soft landscaping and boundary treatments, surface car parking (401 no. spaces), bicycle parking (797 no. spaces), bin & bicycle storage, public lighting, plant (M&E), utility services & 4 no. ESB sub-stations.

This application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015.

6.2. The lands subject to the proposed development are identified within the red line of application as illustrated on the submitted site location map (drawing no. PL 001) and the proposed site plan (drawing no. PL 003), both prepared by Davey-Smith Architects. As can be seen from both drawings, there are two areas of land outlined in red and the area between both, not outlined in red, represents the permitted Clonburris South Link Street and associated infrastructural works that already have the benefit of planning permission under Ref. SDZ20A/0021. These permitted works are also illustrated on the enclosed site layout plan and the proposed development will utilise these permitted works for access and infrastructure. It should be noted at the outset that (a) this application for permission does not propose alterations or modifications to the roads and drainage infrastructure permitted under Ref. SDZ20A/0021 and (b) the aforementioned permitted development was designed to accommodate the future development of the subject lands, i.e. that now subject to this current application for permission. It should also be noted that the aforementioned

permitted infrastructural works include surface water attenuation for both the road and future developments on the SDZ lands through which the road crosses (refer to Fig. 16 below). Furthermore, Cappagh House, located on our client's lands, will be demolished as permitted already under the aforementioned permission for infrastructural works under Ref. SDZ20A/0021 in order to enable access from the western boundary of the site. There is no demolition of habitable or any other structures relating to the proposed development.



**Fig. 16 – permitted surface water attenuation under Ref. SDZ20A/0021 on the subject application site.**

**6.3.** The development put forward for permission proposes the construction of 294 no. dwellings, crèche and retail / commercial unit and all associated site developments works etc., on lands that have been designated by the Government to be of strategic in nature for the delivery of housing. As outlined in section 4, the SZ Planning Scheme sets out the parameters for the development of these lands and the following sets out how the details of the proposed development and its compliance with the Planning Scheme.



Fig. 17 – Proposed Site Layout Plan.

#### 6.4. Dwelling Mix

The proposed development for 294 no. dwellings provides for a mix of dwelling types comprised of:

- 118 no. 2, 3 & 4 bed, 2 storey semi-detached and terraced houses – (c.40% houses);
- 104 no. 2 & 3 bed duplex units accommodated in 10 no. 3 storey buildings – (c.35% duplexes);
- 72 no. 1 & 2 bedroom apartments in 2 no. 4 & 6 storey buildings — (c.25% apartments);

This is further broken down into:

- 14 no. semi-detached houses (5%);
- 104 no. terraced houses (35%);
- 104 no. duplex units (35%);
- 72 no. apartments (c.25%).

A mix of 1, 2, 3 and 4 bedroom dwellings are proposed and details of same are set out in Tables 2 - 9, with a full schedule of accommodation provided for in the enclosed Housing Quality Assessment, which is submitted as a separate document – please refer to same.

#### Houses:



House Type	Description	No. of Units	Floor Area (m <sup>2</sup> )	Total Floor Area (m <sup>2</sup> )
A1	2 storey, 3 bed end of terrace	42	107.4	4,510.8
A2	2 storey, 3 bed mid terrace	39	105.4	4,110.6
A3	2 storey, 3 bed end of terrace	6	105.4	632.4
B	2 storey, 2 bed mid terrace	19	86.2	1,637.8
C	2 storey, 4 bed semi-detached	12	133.8	1,605.6
<b>Total</b>		<b>118</b>	<b>-</b>	<b>12,497.2m<sup>2</sup></b>

Table 2: Proposed House Types.

House Type	2 bed	3 bed	4 bed	Total
No. of Units	19	87	12	118
% Mix	16%	74%	10%	100%

Table 3: Total Proposed House Type Mix.

**Duplex Blocks A, B, E, F, G, H, I & J:**

Description	Floor	No. of Units	Floor Area (m <sup>2</sup> )	Total Floor Area (m <sup>2</sup> )
2 bed / 4 person apartment	Ground	34	77.3	2,628.2
2 bed / 4 person apartment	Ground	6	74.4	446.4
3 bed / 5 person duplex	First & Second	40	111.8	4472
<b>Total</b>		<b>80</b>		<b>7,546.6m<sup>2</sup></b>

**Duplex Blocks C & D:**

Description	Floor	No. of Units	Floor Area (m <sup>2</sup> )	Total Floor Area (m <sup>2</sup> )
2 bed / 4 person apartment	Ground	10	73.1	731
2 bed / 4 person apartment	Ground	2	76	152
3 bed / 5 person duplex	First & Second	12	109.2	1,310.4
<b>Total</b>		<b>24</b>		<b>2,193.4m<sup>2</sup></b>

Table 4: Proposed Duplex Types.



Duplex Type	2 bed / 4 person	3 bed / 5 person	Total
No. of Units	52	52	104
% Mix	50%	50%	100%

Table 5: Total Proposed Duplex Type Mix.

**Apartments:**

**Block A:**

Unit No.	Apartment Type	Floor Area (m <sup>2</sup> )
1	2 bed / 4 person	81.8
2	2 bed / 4 person	82.4
3	2 bed / 4 person	81.8
4	2 bed / 3 person	72.3
5	1 bed / 2 person	53.1
6	2 bed / 4 person	93.3
7	2 bed / 4 person	81.8
8	2 bed / 4 person	85.3
9	2 bed / 4 person	81.8
10	2 bed / 4 person	82.4
11	2 bed / 3 person	75.1
12	1 bed / 2 person	49.9
13	1 bed / 2 person	49.9
14	1 bed / 2 person	49.9
15	2 bed / 4 person	93.3
16	2 bed / 3 person	81.8
17	2 bed / 3 person	85.3
18	2 bed / 4 person	81.8
19	2 bed / 4 person	82.4
20	2 bed / 3 person	75.1
21	1 bed / 2 person	49.9
22	1 bed / 2 person	49.9
23	1 bed / 2 person	49.9
24	2 bed / 4 person	84.1
25	2 bed / 3 person	81.8
26	2 bed / 3 person	85.3
27	2 bed / 4 person	81.8
28	2 bed / 4 person	82.4
29	2 bed / 3 person	75.1
30	1 bed / 2 person	49.9
31	1 bed / 2 person	49.9
32	1 bed / 2 person	49.9



33	2 bed / 4 person	84.1
34	2 bed / 3 person	81.8
35	2 bed / 3 person	85.3
36	2 bed / 4 person	81.8
37	2 bed / 4 person	82.4
38	2 bed / 3 person	75.1
39	1 bed / 2 person	49.9
40	1 bed / 2 person	49.9
41	1 bed / 2 person	49.9
42	2 bed / 4 person	84.1
43	2 bed / 3 person	81.8
44	2 bed / 3 person	85.3
45	2 bed / 4 person	85.9
46	2 bed / 4 person	53.5
47	2 bed / 3 person	72.3
48	2 bed / 4 person	84.1
49	2 bed / 3 person	81.8
50	2 bed / 3 person	85.3
<b>Total = 50 no.</b>		<b>3,664.7m<sup>2</sup></b>

Table 6: Proposed Apartments in Block A.

**Block B:**

Unit No.	Apartment Type	Floor Area (m <sup>2</sup> )
1	1 bed / 2 person	48
2	1 bed / 2 person	52.3
3	1 bed / 2 person	57.1
4	2 bed / 4 person	81.7
5	2 bed / 4 person	84.5
6	2 bed / 4 person	86.4
7	1 bed / 2 person	48
8	1 bed / 2 person	52.3
9	1 bed / 2 person	57.1
10	2 bed / 4 person	81.7
11	2 bed / 4 person	84.5
12	2 bed / 4 person	86.4
13	2 bed / 4 person	80.9
14	2 bed / 4 person	80.6
15	2 bed / 4 person	81.7
16	2 bed / 4 person	84.5
17	2 bed / 4 person	86.4
18	2 bed / 4 person	80.9
19	2 bed / 4 person	80.6
20	2 bed / 4 person	81.7
21	2 bed / 4 person	84.5
22	2 bed / 4 person	86.4
<b>Total = 22 no.</b>		<b>1,648.2m<sup>2</sup></b>

Table 7: Proposed Apartments in Block B



Apartment Type	1 bed	2 bed / 3 person	2 bed / 4 person	Total
No. of Units	19	16	37	72
% Mix	26%	22%	52%	100%

Table 8: Total Type of Proposed Apartments.

Dwelling Type	1 bed	2 bed	3 bed	4 bed	Total	Percentage %
Houses	0	19	87	12	118	40%
Apartments	19	53	0	0	72	25%
Duplex	0	52	52	0	104	35%
Total	19	124	139	12	294	100%
Percentage %	10%	39%	39%	12%	100%	-

Table 9: Overall Proposed Dwelling Mix

The Planning Scheme (section 2.1.6 of same) states that the range of dwellings permitted in Clonburris will include houses, townhouses, duplex units, maisonettes and apartments (including Build to Rent and Shared Accommodation) and also states that *“In order to facilitate market flexibility over the lifetime of the Planning Scheme, a detailed breakdown of unit types is not specified.”* From Tables 2-8 above, it is demonstrated that a wide range of dwelling types and sizes are proposed, including apartments, duplex apartment units and houses in a variety of types.

It is also put forward that the current proposal provides for apartments, duplexes and houses of varying size and type. The proposed mix of dwelling types is dispersed throughout the site to create a compact urban layout at an efficient density. All of the proposed dwellings either meet or exceed the minimum relevant standards for living accommodation. In addition, the proposed development is in accordance with the National Planning Framework, which recognises the increasing demand to cater for one and two person households, a mix of 1 bed apartments and 2 bed houses are catered for, equating to 71% of the overall proposed unit types.

## 6.5. Dwelling Size

Section 2.1.6 of the Planning Scheme states that the design and layout of individual dwellings should provide a high-quality living environment for residents and that regard should be given to the targets and standards set out under Quality Housing for Sustainable Communities Guidelines (2007) with regard to minimum room sizes, dimensions and overall floor areas. It also states that all apartments shall accord with or exceed the open space and floor area standards set out in the 2015 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for



Planning Authorities (we note that these have been superseded by an updates version issued in 2020).

Tables 2.1.9 and 2.1.10 of the Planning Scheme set out the minimum space standards for houses and apartments respectively. Tables 2-6 above, as well as the more detailed enclosed Housing Quality Assessment (HQA) demonstrate that the proposed dwellings either meet or exceed the standards set out in both the Quality Housing for Sustainable Communities Guidelines (2007) and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) (hereafter "Apartment Guidelines").

Type of Unit	Houses	Private Open Space
One Bedroom	50 sq.m	48 sq.m
Two Bedroom	80 sq.m	55 sq.m
Three Bedroom	92 sq.m	60 sq.m
Four Bedroom or more	110 sq.m	70 sq.m

Fig. 18 – Extract from Table 2.1.9 "Minimum Space standards for Houses" of the SDZ Planning Scheme.

It is evident from Table 2 above that the 5 no. proposed house types all exceed the minimum standards set out in the Table 2.1.9 of the Planning Scheme and this is also demonstrated in the submitted HQA – please refer to same.

In relation to compliance with the 2020 Apartment Guidelines, the following is noted with reference to the Specific Planning Policy Requirements (SPPRs) contained in same:

#### Specific Planning Policy Requirement 1 (Mix)

Specific Planning Policy Requirement 1 (SPPR 1) states that '*Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)*'.

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios).

Unit Type	1 bed	2 bed	3 bed	Total
Apartments	19	53	0	72
Duplex Apartments	0	52	52	104
Total	19	105	52	176
Overall Mix %	11%	60%	29%	100%

Table 10: Overall Apartment / Duplex Mix

The proposed development complies with SPPR 1 as it provides for 176 no. apartments and duplex units comprised of 11% (19 no. 1 bedroom units), 60% (105 no. 2-bedroom units) and 29% (52 no. 3-bedroom units).

We also note that no Housing Need and Demand Assessment has been undertaken by the Planning Authority for this area of the County, and it is therefore submitted that the proposed unit mix is consistent with the relevant planning policy requirement for Unit Mix.





### **Specific Planning Policy Requirement 2 (Small Urban Infill Sites)**

Specific Planning Policy Requirement 2 (SPPR 2) is not relevant to the subject site.

### **Specific Planning Policy Requirement 3 (Minimum Areas)**

Specific Planning Policy Requirement 3 (SPPR3 2) requires the following minimum floor areas for apartments:

- Studio apartment Minimum 37 sq.m;
- 1 bedroom apartment Minimum 45 sq.m;
- 2 bedroom apartment Minimum 73 sq.m;
- 3 bedroom apartment Minimum 90 sq.m.

The proposed development complies with the minimum apartment floor area requirements set out in SPPR3. The schedule of accommodation / Housing Quality Assessment, as well as the submitted drawings prepared by Davey-Smith Architects demonstrates that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2020.

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

Using the minimum standards of the Apartment Guidelines, the proposed 176 no. apartments and duplex units should have a total floor area of 13,200m<sup>2</sup>. In total, the proposed 176 no. apartments and duplex units provide a total floor area of 15,052.9m<sup>2</sup>, which is an exceedance of 14% above the minimum standard.

Therefore, the proposed development complies with SPPR 3.

### **Specific Planning Policy Requirement 4 (Aspect)**

SPPR4 of the Guidelines relates to the provision of dual aspect units. The proposed development includes 80% dual aspect units (140 no.) There are no north facing single aspect units within the scheme.

### **Specific Planning Policy Requirement 5 (floor to ceiling heights)**

The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level.

### **Specific Planning Policy Requirement 6 (Max units per core)**

SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes.

The apartment to stair/lift core ratio varies per block. The maximum no. of apartments per core is 9. The proposal therefore complies with this SPPR6.

The submitted Housing Quality Assessment demonstrates how the proposed apartments comply with appendix 1 of the Apartment Guidelines 2020 in respect of sizes of apartments, minimum aggregate floor areas, widths, storage, minimum private open space – please refer to this separate document that accompanies this application for permission.



With reference to Appendix 1 of the Apartment Guidelines, communal open space for Blocks A and B would require a communal open space provision of 450m<sup>2</sup>. The communal open space provided of c. 746.2m<sup>2</sup> is substantially above the requirements.

### **SPPRs 7, 8 and 9 - Build to Rent and Shared Accommodation**

The above SPPR's do not apply to the proposed development.

## **6.6. Ancillary Services / Other Proposed Uses**

Non-residential uses within the current application consist of:

- a) a proposed crèche facility of 520.2m<sup>2</sup>, which is located on the ground and first floor of/adjacent to Block A;
- b) a proposed retail / café / commercial unit of 152.2m<sup>2</sup>, which is also located on the ground and first floor of/adjacent to Block A.

The proposed development comprises 294 no. dwellings consisting of 118 no. 2, 3 and 4 bed houses, 72 no. 1 and 2 bed apartments, and 104 no. 2 and 3 bed duplex units. As set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020), 1 bed units should not generally be considered to contribute a requirement for childcare provision.

Therefore, by excluding the proposed 19 no. 1 bed units, the proposed development comprises 275 no. 2, 3 and 4 bed units which would give a requirement for c. 73 no. childcare places based on the standards of the Childcare Facilities Guidelines for Planning Authorities (2001).

The development provides a crèche of c. 520m<sup>2</sup>, located adjacent to Block A in the western part of the site, adjacent to the proposed plaza, close to the existing park and ride facility, as well as being in a highly visible location. The proposed crèche is also afforded 3 no. dedicated car parking spaces and 13 no. bicycle parking spaces. The proposed floor area of the crèche exceeds the minimum requirement and includes sufficient additional floorspace to accommodate food prep area, toilets, sleep room, reception/office, circulation and escape route spaces, furniture and permanent fixtures as required, and caters for 84 no. children at a minimum.

Details of the proposed crèche are set out on the enclosed Davey-Smith drawing no.s PH007, PH011 & PH026 – please refer to same. These drawings also detail the plans for the proposed retail / commercial unit.

The development also includes for all associated site development works including car parking, landscaping and open spaces and piped and wired services, bin & bicycle stores, sub-stations, all on an overall site area of approximately 6.3Ha.

## **6.7. Gross Floor Space**

The proposed residential accommodation comprises a total of 27,550.1m<sup>2</sup> gross floor area. The proposed non-residential elements comprise a crèche of 520.2m<sup>2</sup> and a retail / commercial unit of 152.2m<sup>2</sup>. The total gross floor area proposed is 28,222.5m<sup>2</sup>.

- Residential floor space – 27,550.1m<sup>2</sup>;
- Crèche – 520.2m<sup>2</sup>;
- Retail / commercial unit – 152.2m<sup>2</sup>;
- Total floor area – 28,222.5m<sup>2</sup>.



## 6.8. Key Design Principles

This application for permission is accompanied by a detailed design statement, prepared by Davey-Smith Architects, which accords with section 2.8.2 of the Planning Scheme – please refer to the submitted “Architectural Design Statement”.

Key features of the site have been incorporated into the design strategy of the proposed development. The site is adjacent to the existing park and ride facility associated with the Clondalkin / Fonthill train station, to the immediate north-west. The car park is higher than that subject site by c.1m and the level difference presents as a small embankment along this boundary. In addition, a central hedgerow runs north to south through the site and is identified in the SDZ Planning Scheme as being part of the green infrastructure of the lands (refer to Figure 2.3.1 “Green Infrastructure” in Planning Scheme). This existing hedgerow is incorporated into the main central spine of open space within the proposed development.

The future Clonburris Southern Link Street (CSLS) bisects the proposed development. This link street will be characterised by a duplex typology that features a strong architectural gable frontage designed in manner that allows for alternating materials over a common ground floor base. These gable facades measure over 12m at their apex which ensures a strong, urban street edge. The entrance to the development along the CSLS from the Fonthill Road is marked by two taller apartments buildings (Blocks A & B) which are 6 and 4 storeys respectively. Block A faces directly onto a new urban/civic plaza.

Own door, traditional housing comprised of terraced and semi-detached houses are proposed beyond the main urban edges which ensures that the central area of open space is passively supervised. The central park is planned as a key organising element within the design strategy for the proposed development. While the park will ensure the greatest area of protection for the central hedgerow to be maintained, it will also provide a clear sense of place and orientation for the residents within the scheme, being equally accessible from the east and west.

## 6.9. Development Areas

The application site straddles two separate “Development Areas” of the SDZ Planning Scheme:

- i. Part of Development Area 1 – Clonburris Urban Centre i.e. part of sub-sector CUC-S4;
- ii. Development Area 2 – Clonburris South East i.e. sub-sectors CSE-S1 and CSE-S2.

Both of these Development Areas are located within the Clonburris Character Area, with section 3.2 of the Planning Scheme stating that *“the Clonburris Character Area will comprise clustering of residential, retail and commercial uses to form a centre located around the Clondalkin- Fonthill Railway Station. The centre will comprise medium to high density development located close to the public transport hub of heavy rail and planned Core Orbital bus services. Civic and community uses will also locate at the Clonburris centre and will contribute to the creation of an active and busy centre organised around a high quality designed Urban Square at its retail core. Development will transition outwards from the centre to medium and lower density residential development with local nodes, community floorspace, schools and high quality open spaces”*.

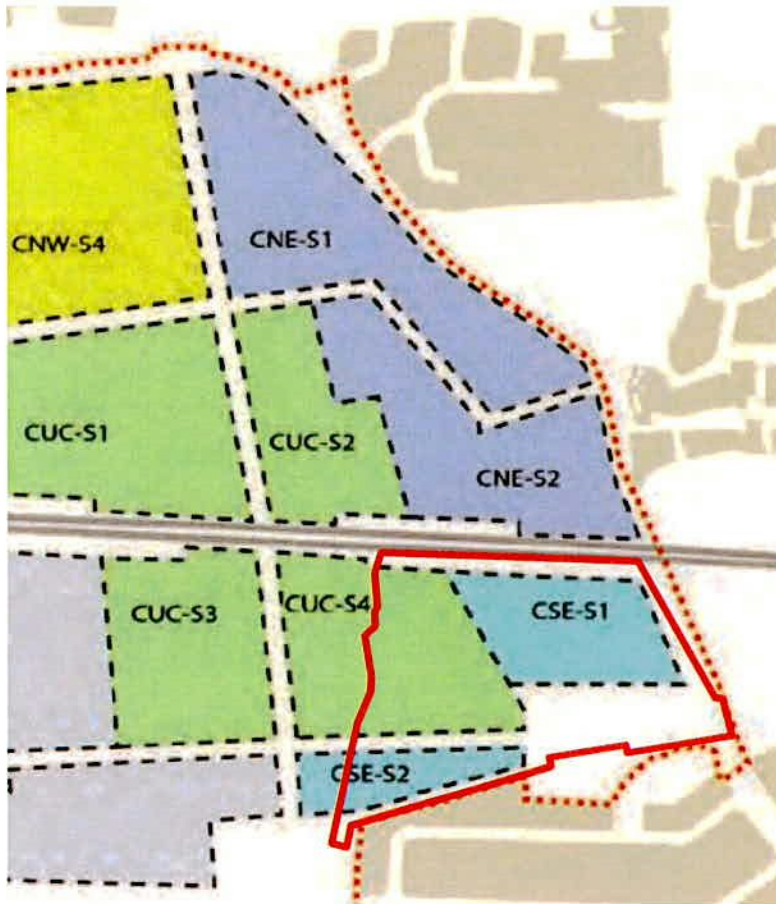


Fig. 19 – Indicative outline of application site as per the Development Areas and Sub-Sectors of the Planning Scheme.

Both of these Development Areas are located within the Clonburris Character Area, with section 3.2 of the Planning Scheme stating that “the Clonburris Character Area will comprise clustering of residential, retail and commercial uses to form a centre located around the Clondalkin- Fonthill Railway Station. The centre will comprise medium to high density development located close to the public transport hub of heavy rail and planned Core Orbital bus services. Civic and community uses will also locate at the Clonburris centre and will contribute to the creation of an active and busy centre organised around a high quality designed Urban Square at its retail core. Development will transition outwards from the centre to medium and lower density residential development with local nodes, community floorspace, schools and high quality open spaces”.

### 6.9.1. Development Area 1 – Clonburris Urban Centre

The Development Area of Clonburris Urban Centre is sub-divided into 4 separate sub-sectors i.e. CUC-S1, CUC-S2, CUC-S3 and CUC-S4 which combined account for a net developable area of 17.9Ha, which is envisaged to accommodate 1,938 no. dwellings, as well as retail and non-retail commercial development.

The subject application site lies within sub-sector CUC-S4 but does not occupy all of that sub-sector due to ownership as well as the existing park and ride facility. Approx. 1.7Ha can be discounted from the overall net development area of CUC-S4 which lies outside the application site, thus leaving approx. 2.12Ha of sub-sector CUC-S4 within the application site.

The key objectives of the Planning Scheme as they relate to Development Area 1 Clonburris Urban Centre are:

- To develop a high quality mixed use District Centre to serve the community of Clonburriss and surrounding communities.
- To provide for significant commercial (non-retail) provision in areas of high accessibility to public transport.
- To provide for a District Centre level retail to support a range of needs within the district catchment.
- To develop a significant multi-purpose civic building for the entire SDZ area and surrounding communities.
- To ensure high levels of legibility and ease of orientation.
- To achieve high levels of permeability, particularly for pedestrians and cyclists.
- To provide for transport interchange at the railway station, in particular, connecting rail, bus and cyclists.
- To provide a new civic space for Clonburriss, which will serve as multi-functional business and social space focal space.
- To achieve good levels of continuity and enclosure along the arterial streets, Link Streets/avenues and the urban spaces.

The main retail area of Clonburriss Urban Centre is to be to the north-west in sub-sector CUC-S1, with the subject application site being identified as accommodating missed uses including retail, community and residential, as per Figure 2.5.1 "Function Map" of the Planning Scheme – refer to Fig. 20:

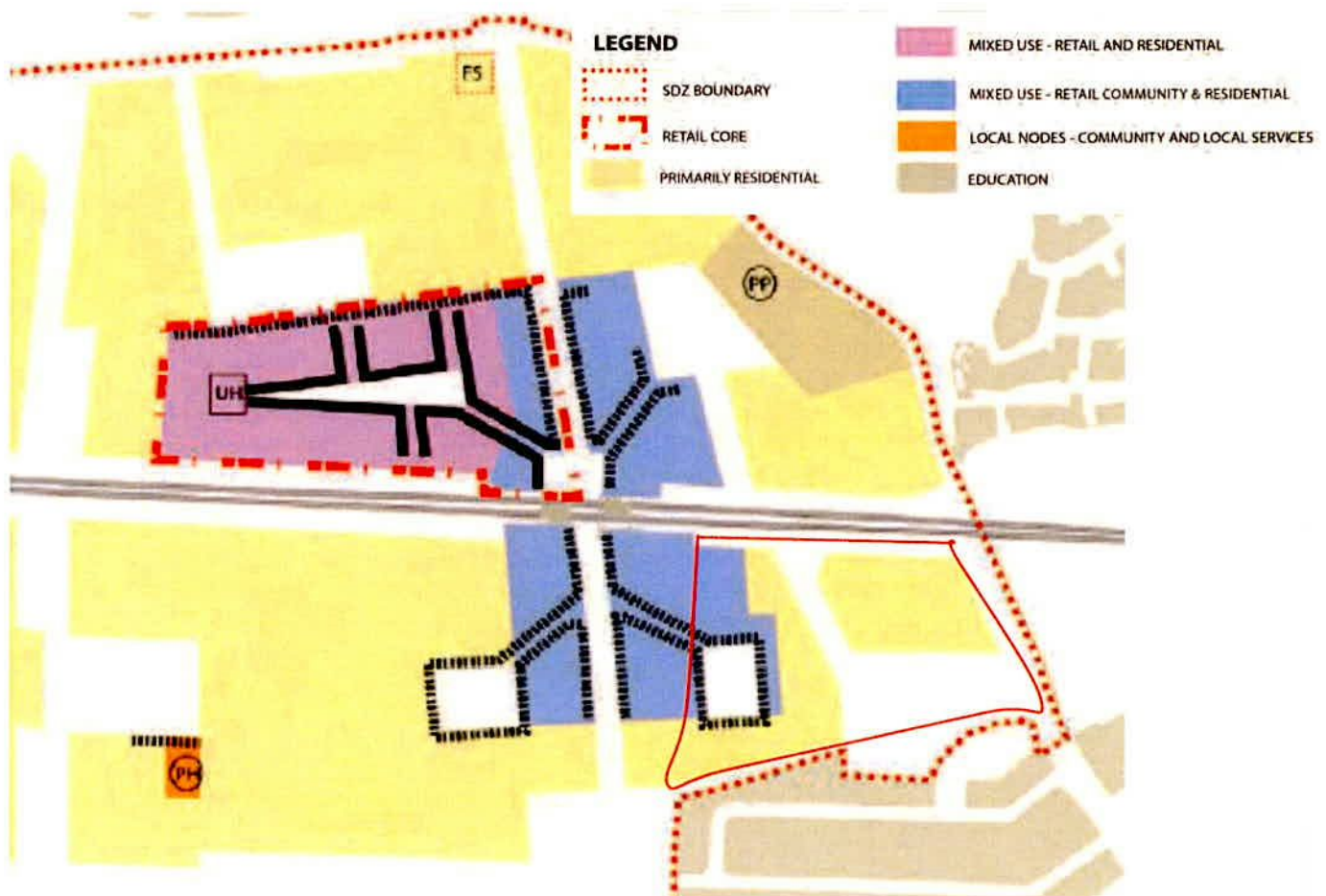


Fig. 20 – Extract from Figure 2.5.1 "Function Map for Planning Scheme with subject application site indicatively outlined in red.



### 6.9.1.1. Density and Quantum of Dwellings

Section 2.1.5 of the Planning Scheme sets out the density margins within the Development Areas. The Planning Scheme notes that to allow for more accurate management of densities and ensure that higher densities are achieved within appropriate areas, densities under this Planning Scheme are prescribed according to Sub Sector (as Development Areas are divided into Sub Sectors - refer to Figure 2.1.4). Development within each Sub Sector shall be consistent with the density margins set out in Table 2.1.8.

According to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.

Residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development).

Development Area	Sub Sector	Net Density Margin per Ha.	
		MIN.	MAX.
Clonburris Urban Centre (CUC)	S1	65	150
	S2	73	150
	S3	65	150
	S4	67	150

Fig. 21 – Extract from Table 2.1.8 “Density Margin per Sub Sector” of the Planning Scheme, with the subject site being located within part of sub-sector S4.

It can therefore be seen that sub sector CUC-S4 has a density range of 67-150 units per hectare. As outlined above, the subject application site does not occupy all of sub-sector CUC-S4 due to ownership as well as the existing park and ride facility. Approx. 1.7Ha can be discounted from the overall net development area of CUC-S4 which lies outside the application site, thus leaving approx. 2.12Ha of sub-sector CUC-S4 within the application site. As part of the subject application, approx. 143 no. dwellings are proposed in CUC-S4 which equates to a net density of 84 units per hectare which is within the minimum and maximum density range of the Planning Scheme for CUC-S4.

It is also noted that this is the first development proposal within the Clonburris Urban Centre, with further proposals to follow in the future. The Applicant also controls additional lands within Clonburris Urban Centre Development Area, i.e. Sub-Sector CUC-S2 to the north, with further sub-sectors to the west in separate ownership/control, that are all likely to be the subject of future planning applications for development.

### 6.9.1.2. Quantum of Dwellings

Table 2.13.1 of the Planning Scheme provides a summary of the quantitative parameters contained within the Planning Scheme. For the purposes of the subject application, table 11 over shows the relevant targets for the application site.

- Total dwellings (low margin) – 258
- Total dwellings (high margin) – 573
- Total dwellings (target) – 414



Development Area	Sub-Sector	Net Area (Ha)	Average Net Density (Low)	Average Net Density (High)	Total No. Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)
Clonburris Urban Centre	CUC-S4	3.82	67	150	258	414	573

Table 11 – Extract from Table 2.13.1 “Development Areas in Clonburris and Sub Sectors”.

As outlined above, the subject application site lies within sub-sector CUC-S4 but does not occupy all of that sub-sector due to ownership as well as the existing park and ride facility. Approx. 1.7Ha (c. 45%) can be discounted from the overall net development area of CUC-S4 which lies outside the application site, thus leaving approx. 2.12Ha (c. 55%) of sub-sector CUC-S4 within the application site. As part of the subject application, approx. 143 no. dwellings are proposed in CUC-S4. As the application site represents c.55% of the developable area of CUC-S4, the proposed 143 no. dwellings accords with 55% of the target no. of dwellings (low margin) (258 x 55% = 142), therefore the proposed development is within the permitted range of target dwellings for CUC-S4.



Fig. 22 – Extract from Figure 3.3.3 “Clonburris Urban Centre” of the Planning Scheme, with part of the subject application site outlined in red.

### 6.9.1.3. Non-Residential Use

As illustrated in Fig. 22 above, the main retail area of Clonburris Urban Centre is to be to the north-west in sub-sector CUC-S1, with the subject application site being identified as accommodating missed uses including retail, community and residential, as per Figure 2.5.1 “Function Map” of the Planning Scheme.

Non-residential uses within the current application consist of:

- a) a proposed crèche facility of 520.2m<sup>2</sup>, which is located on the ground and first floor of/adjacent to Block A;
- b) a proposed retail / café / commercial unit of 152.2m<sup>2</sup>, which is also located on the ground and first floor of/adjacent to Block A.

The proposed non-residential uses will be located adjacent to a public/civic plaza area at the entrance to the development off the Fonthill Road. The proposed Civic Plaza (1,115.9m<sup>2</sup>) will be a landscaped forecourt for a creche, a local shop and a taller apartment building. The plaza is a pedestrian priority zone with parking provided to the side for drop off / collection. The play space for the creche is south facing and is provided a threshold of protection from the adjoining public plaza by a subtle manipulation of the landscape in this area, so that the play space is secured and unobtrusive. The retail unit is proposed over two floors with independent access off the public plaza. This unit could be subdivided into two or more units with a shop on the ground floor and consultant/ service use on the first /mezzanine floor.



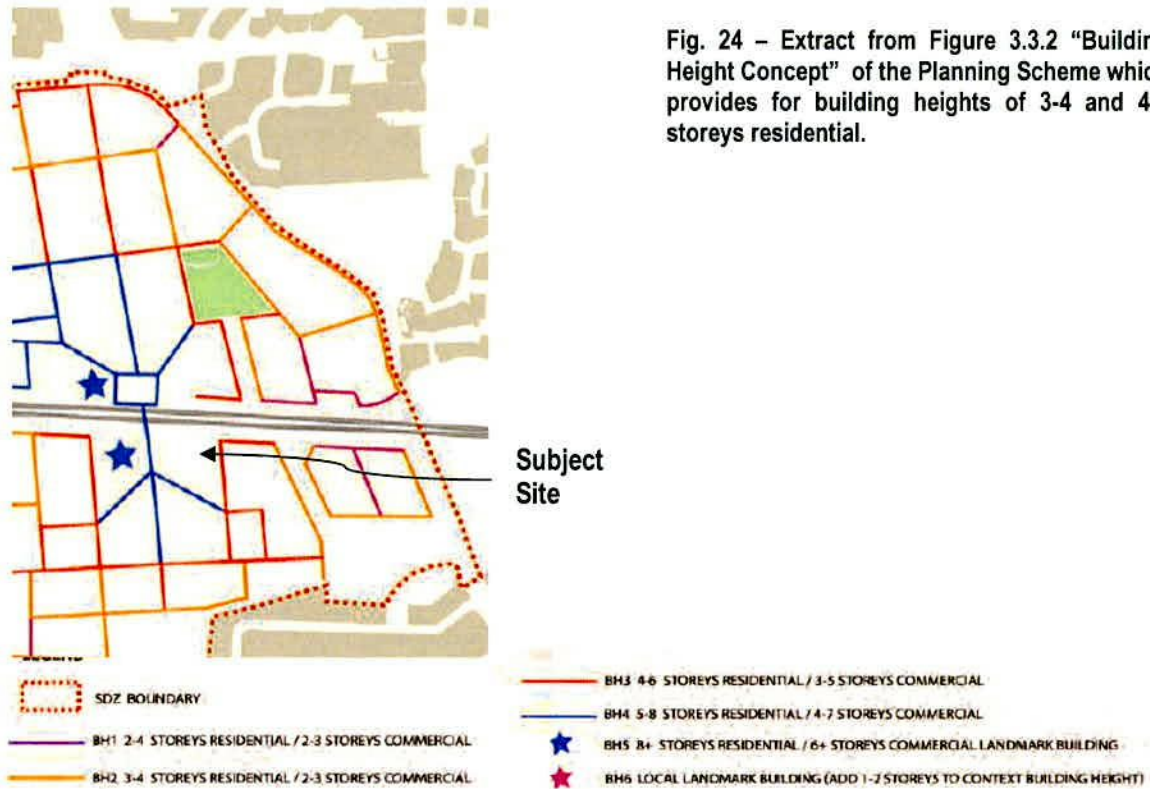
Fig. 23 - View of proposed Civic Plaza with local shop, creche at Block A.

#### 6.9.1.4. Building Height

Figure 3.3.2 - Building Height Concept of the Clonburrish Strategic Development Zone Planning Scheme (see Fig. 24 overleaf) sets out the height concept for the SDZ. This is to be read in conjunction with the requirements of Section 2.8.6 and the relevant character area of the SDZ, in this case the area known as CUC\_S4 within Development Area 1: Clonburrish Urban Centre.

The concept diagram indicates a height range of 4 – 6 storeys in the western part of the application site and 3 – 4 storeys on the eastern part of the site. Table 3.3.1 of the Planning Scheme states that building heights of 2 – 8 storeys are permissible in sub-sector CUC-S4 of the Clonburrish Urban Centre. The proposed building heights in this part of the application site are 2 storey houses, 3 storey duplex units and apartment Block A which is 6 storeys, therefore the proposed building heights are within the parameters for same as per the Planning Scheme.





### 6.9.2. Development Area 2 – Clonburris South East (i.e. CSE-S1 & CSE-S2)

The Development Area of Clonburris South East is sub-divided into 2 separate sub-sectors i.e. CSE-S1 and CSE-S2 which combined account for a net developable area of 3.3Ha, which is envisaged to accommodate 201 no. dwellings.

The application site also lies within the majority of sub-sector CSE-S1 in Clonburris South East. A strip of approx. 0.17Ha along the eastern boundary of CSE-S1 can be discounted that is outside of the application site (in separate ownership) which leaves a net developable area of approx. 2Ha.

The application site also straddles part of sub-sector CSE-S2 in Clonburris South East. Approx. 0.4Ha can be discounted from the net developable area of CSE-S2 as it lies outside of the subject application site, thus leaving approx. 1.7Ha of sub-sector CSE-S2 within the application site.

The key objectives of the Planning Scheme as they relate to Development Area 2 Clonburris South East are:

- *To develop a high quality residential neighbourhood at Clonburris South East;*
- *To integrate with existing development at Cappaghmore;*
- *To provide locally accessible open spaces of local and strategic importance;*
- *To ensure high levels of legibility and ease of orientation;*
- *To provide a new Link Street/avenue between Clonburris urban centre and Lucan-Newlands Road;*
- *To prioritise pedestrian and cyclist movement and to provide for local bus services along the avenue;*
- *To provide for a range of housing along the new avenue and local streets including home zones;*
- *To provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake within a new strategic open space at Cappaghmore; and*

- To retain the Cappamore Lodge Screen entrance wall as a gateway feature



Fig. 25 – Extract from Figure 3.3.5 “Clonburris South East” of the Planning Scheme, within part of the subject application site outlined in red – located in sub-sectors CSE-S1 and CSE-S2.

### 6.9.2.1. Density and Quantum of Dwellings

Section 2.1.5 of the Planning Scheme sets out the density margins within the Development Areas. The Planning Scheme notes that to allow for more accurate management of densities and ensure that higher densities are achieved within appropriate areas, densities under this Planning Scheme are prescribed according to Sub Sector (as Development Areas are divided into Sub Sectors - refer to Figure 2.1.4). Development within each Sub Sector shall be consistent with the density margins set out in Table 2.1.8.

According to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.

Residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development).



Development Area	Sub Sector	Net Density Margin per Ha.	
		MIN.	MAX.
Clonburriss South East (CSE)	S1	51	61
	S2	65	75

Fig. 26 – Extract from Table 2.1.8 “Density Margin per Sub Sector” of the Planning Scheme.

It can therefore be seen that sub sector CSE-S1 has a density range of 51-61 units per hectare. The net developable area of the application site within CSE-S1 is 2Ha, upon which it is proposed to deliver 141 no. dwellings, thus producing a net density of 70 units per hectare.

It can also be seen that sub sector CSE-S2 has a density range of 65-75 units per hectare. The net developable area of the application site within CSE-S2 is 1.7Ha, upon which it is proposed to deliver 66 no. dwellings, thus producing a net density of 39 units per hectare.

In total, 207 no. dwellings are proposed in Clonburriss South East, with this part of the application site equating to 3.7Ha which produces a density of 56 units per hectare.

### 6.9.2.2. Quantum of Dwellings

Table 2.13.1 of the Planning Scheme provides a summary of the quantitative parameters contained within the Planning Scheme. For the purposes of the subject application, table 12 below shows the relevant targets for the application site.

Development Area	Sub - Sector	Net Area (Ha)	Average Net Density (Low)	Average Net Density (High)	Total No. Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)
Clonburriss South East	CSE-S1	2.17	51	61	111	122	132
Clonburriss South East	CSE-S2	1.13	65	75	73	79	85

Table 12 – Extract from Table 2.13.1 “Development Areas in Clonburriss and Sub Sectors”.

#### CSE-S1

- Total dwellings (low margin) – 111
- Total dwellings (high margin) – 132
- Total dwellings (target) – 122

#### CSE-S2

- Total dwellings (low margin) – 73
- Total dwellings (high margin) – 85
- Total dwellings (target) – 79

The part of the application site that lies within Clonburriss South East proposes to develop 207 no. dwellings across both sub-sectors (CSE-S1 = 141 no. units + CSE-S2 = 66 no. units) which is within the combined total dwellings high margin for both sub-sectors i.e. CSE-S1 = 132 no. units + CSE-S2 = 85 no. units – total = 217 no. units, therefore meeting the target dwelling numbers for this Development Area as set out in the Planning Scheme.

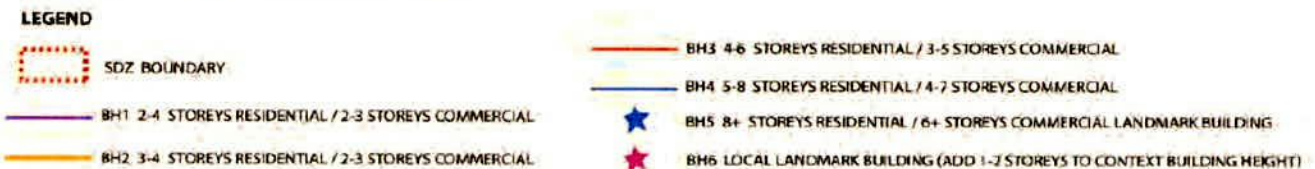
### 6.9.2.3. Building Height

Figure 3.3.2 - Building Height Concept of the Clonburris Strategic Development Zone Planning Scheme (see Fig. 27 below) sets out the height concept for the SDZ. This is to be read in conjunction with the requirements of Section 2.8.6 and the relevant character area of the SDZ, in this case the area known as CSE-S1 and CSE-S2 within Development Area 2: Clonburris South East.

The concept diagram indicates a height range of 4 – 6 storeys in the western part of the application site and 2 – 4 storeys on the eastern part of the site. Table 3.3.2 of the Planning Scheme states that building heights of 2 – 4 storeys are permissible in sub-sector CSE-S1 and 2 – 6 storeys are permissible in sub-sector CSE-S2. The proposed building heights in this part of the application site are 2 storey houses, 3 storey duplex units and apartment Block B which is 4 storeys, therefore the proposed building heights are within the parameters for same as per the Planning Scheme.



Fig. 27 – Extract from Figure 3.3.2 “Building Height Concept” of the Planning Scheme which provides for building heights of 3-4 and 4-6 storeys residential.



### 6.10. Access

The future Clonburris Southern Link Street (CSLS) bisects the proposed development. North of the CSLS the site is within sub-sectors CUC-S4 and CSE-S1, while to the south, the application site is within sub-sector CSE-S2, with the overall application site straddling two separate Development Areas, i.e. part of Clonburris Urban Centre and all of Clonburris South East. The Clonburris South Link Street which links the R113 (Fonthill Road) to the west, to the Ninth Lock Road (L1026) to the east will provide access to the subject site.

The proposed development will be accessed from the Clonburris Southern Link Street (CSLS) which has been granted permission in August 2021 under planning reference SDZ20A/0021. The CSLS includes minor priority-controlled junctions along the street alignment to provide access to future development cells within the Clonburris SDZ, including the subject site. The subject site's internal road layout has been designed with a number of junctions



and a meandering alignment through the development to promote traffic calming and discourage “rat running” through the development. The proposed development also includes a new road off the CSLS to provide access to Whitton Avenue to the south, as agreed in principle with the Planning Authority.

## 6.11. Movement and Transport

The Planning Scheme states that the key principles in relation to movement and transport are:

- *To link the Development Areas of Clonburriss with each other and with surrounding communities through a permeable and clear hierarchy of integrated streets and dedicated pedestrian and cycle routes;*
- *To integrate appropriate pieces of infrastructure that overcome challenges to movement across the SDZ lands;*
- *To develop a transport framework that maximises route choice and access to residential, education, retail, service, community and leisure uses by means of walking, cycling and public transport while balancing the needs of the car;*
- *To upgrade existing sections of strategic roads within the SDZ lands to integrated urban streets.*
- *To seek the delivery of public transport infrastructure and services that will serve the trips demands of the SDZ Planning Scheme.*

### 6.11.1. Pedestrian and Cycle Movement

The Planning Scheme also seeks to ensure that development within the SDZ lands will be afforded direct or indirect access to dedicated pedestrian and cycle routes (strategic and local), Link Streets and Arterial Streets.

Existing and planned streets are classified within a hierarchy on the basis of their function, context and location. All street typologies within the hierarchy are to be designed in accordance with the requirements of DMURS (2013), the National Cycle Manual (2011), the Guidelines for Setting and Managing Speed Limits in Ireland (2015) together with the street typologies, as illustrated in the Planning Scheme.

The design of the proposed development has taken into account the relevant provisions of DMURs, and guidelines above, including the objectives set out in the Planning Scheme. It is a necessary part of the design framework for a residential development such as this to ensure that there is good permeability for those residents and visitors to the development who choose not to travel by car. The development has been designed to ensure that there is good permeability for pedestrians and cyclists. Connections between the internal layout and the external pedestrian and cycle networks located on the South Link Road, form part of the overall access strategy for the site. Within the proposed development, pedestrian movement is suitably catered for by footpath connections within and adjacent to the development up to the relevant boundaries.

The internal layout demands that all visitors to the site are catered for and so pedestrian routes between dwelling areas and key nodes within the layout are well designed and clearly delineated. Given the experience of the applicant as a long-established house builder, the need to create a safe environment that satisfies resident’s requirements and convenience has been taken into account in the overall design. Accordingly, every effort has been made to ensure that vehicular access will be restricted in areas where there are likely to be the highest concentrations of pedestrian/cycle movements.

The internal site layout will include several crossing facilities that are located along key desire lines, and which coordinate well with the proposed car parking layouts to enhance the safety, visibility and convenience of those



people on foot. These facilities will include features such as tactile paving and surface treatments that will benefit all users and assist those with impaired mobility.

Pedestrian linkages will be provided to the boundary of the local estates and other future developments as part of the development. Pedestrian linkage to the lands that form part of the Clonburris SDZ will be provided as part of subsequent stages of development.

Given the desire in current planning guidance to improve accessibility for non-car modes of travel, access by bicycle is increasingly important. Since the weather and topography inevitably have an influence on cycle use, the key to cycle accessibility is the existence of convenient and safe links associated with secure and carefully sited cycle parking.

### 6.11.2. Car and Bicycle Parking

The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022, with this application also accompanied by a Residential Travel Plan which sets out the car and bicycle parking requirements and strategy for the proposed development – please refer to sections 4.4 and 4.5 of same. A summary of same is as follows:

#### Car Parking:

Table 11.24 'Maximum Parking Rates (Residential Development)' of South Dublin County Council's Development Plan 2016-2022 sets out the car parking requirements for various types of development. South Dublin County Council's parking standards are described as maximum standards i.e., parking should not be provided over and above same. The 2020 'Sustainable Urban Housing – Design Standards for New Apartments' sets out alternative designer standards for apartments. Under these Guidelines *'the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.'*

Therefore, the car parking provision for the site seeks to balance to maximum requirements, as described in the South Dublin County Council Development Plan, and what is sustainable based on the criteria outlined in the 'Sustainable Urban Housing – Design Standards for New Apartments'. This approach will be adopted for both the apartments and duplex in this development.

We also note that section 2.2.6 "Parking" of the SDZ Planning Scheme states that the car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies the Planning Scheme. It also states that *"the standards are maximum parking standards and should not be viewed as a target"*.

The Planning Scheme also states that *"Further to the Accessibility Assessment carried out as part of the accompanying Transport Assessment and Strategy, Zone 2 parking standards prescribed under the South Dublin County Council Development Plan 2016 – 2022 shall be applied to all areas that have been identified with an accessibility level of 1, 2 or 3 (see Fig. 2.2.8). Zone 1 parking standards shall be applied to all other areas of the SDZ lands"*.

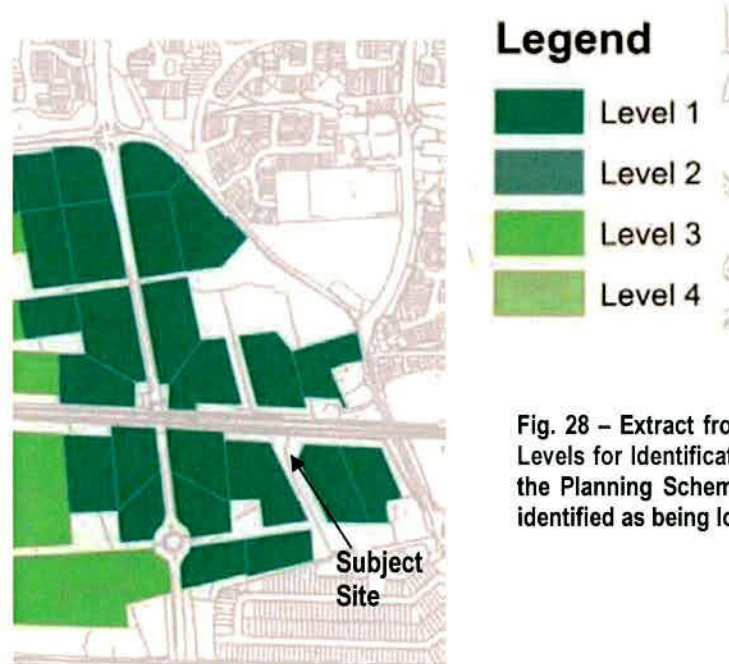


Fig. 28 – Extract from Figure 2.2.8 “Accessibility Levels for Identification of Car Parking Zones” of the Planning Scheme, with the subject sit being identified as being located in “Level 1”.

The subject lands are located within an area with an accessibility level of 1 and are therefore located within Zone 2 (as per the South Dublin County Development Plan standards).

For the proposed 118 no. houses, parking provision for the houses will be in accordance with table 11.24 ‘Maximum Parking Rates (Residential Development)’ the Development Plan, a total of 236 no. car parking spaces for the houses will be provided in this development.

For the 104 no. duplex units, car parking in accordance with the 2020 ‘Sustainable Urban Housing – Design Standards for New Apartments’ is applied, with 99 no. car parking spaces afforded to the proposed duplex units.

For the 72 no. apartments, accommodated in Blocks A and B, car parking in accordance with the 2020 ‘Sustainable Urban Housing – Design Standards for New Apartments’ is applied, with 55 no. car parking spaces afforded to the proposed duplex units.

The 2020 ‘Sustainable Urban Housing – Design Standards for New Apartments’ determines the car parking requirements *‘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’* based on the following designations:

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

A Central and/or Accessible Urban Locations are defined by larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport where the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.

Intermediate Urban Locations are defined as suburban/urban locations that are 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). In such instances, planning authorities are encouraged to consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.



Peripheral and/or Less Accessible Urban Location are defined by locations that are peripheral or less accessible urban locations where one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.

For the purpose of this application, the development is considered as Central and/or Accessible Urban Locations given its proximity to Clondalkin Fonthill Train Station and frequent bus services.

As apartment and duplex elements of this development are well served by public transport, in such instances planning authorities are encouraged to consider a reduced overall car parking standard and or eliminate altogether. Therefore, a total of 154 no. parking spaces will be provided for the development duplex and apartment elements of the development.

Parking will be provided within the curtilage of each house. On street surface car parking will be provided for the apartments, duplexes, creches and visitor car parking spaces.

The Development Plan standard suggests a total of 241 no. spaces for the apartment/duplex element of the proposed development.

Without car parking dominating the proposal and taking into account the guidance set out in publications like DMURS and 'Sustainable Urban Housing – Design Standards for New Apartments' it is proposed to provide 154 no. spaces for the apartment blocks and duplex units. This level of parking will both meet the demand for spaces but will also act as demand management tool for trips to/from the proposed development. Therefore, a balance has been struck for the car parking provision taking into account the Development Plan standard and the anticipated demand.

A summary of the car parking provided for the proposed development is as follows:

- 236 no. spaces for 18 no. houses;
- 99 no. spaces for 104 no. duplex units;
- 55 no. spaces for 72 no. apartments;
- 3 no. spaces for the creche;
- 8 no. spaces for the retail/commercial unit;
- Total = 401 no. car parking spaces.

#### Bicycle Parking:

Table 11.22 'Minimum Bicycle Parking Rates' of the South Dublin County Development Plan 2016-2022 sets out the cycle parking requirements for various types of development. In accordance with Table 11.22 'Minimum Bicycle Parking Rates' of the Development Plan a total of 51 no. bicycle spaces are required. Given that the requirements of the 2020 'Sustainable Urban Housing – Design Standards for New Apartments' has been applied to the car parking provision for the apartments and duplex, the quantum of cycle parking required to meet the standards has been calculated to be 84 no. spaces.

The proposed development has sought to reduce the number of car parking spaces overall. The 2020 Sustainable Urban Housing – Design Standards for New Apartments states that where it is sought to reduce car parking provision in apartment schemes, it must be demonstrated that other non-car based modes of transport can meet the needs of residents, whether in full or in part, additional secure, covered cycle parking provision will be necessary. Given that car parking is provided at c. 0.9 spaces per unit, the provision of cycle spaces should be greater than the Development Plan requirement but less than the 'Sustainable Urban Housing – Design Standards for New Apartments' requirement. Therefore, 797 cycle spaces will be provided. The Apartment Guidelines suggest, as a benchmark guideline for apartments, that an absolute minimum of one secure, covered bicycle parking space per unit should be required. This benchmark has been provided. Therefore, it is considered that the provision of 84 no. bicycle spaces will meet the demand of local residents. Bicycle parking for the proposed houses will be



accommodated within the curtilage of each property, with dedicated bicycle stores provided for each apartments / duplex block/building, as identified on the submitted site layout plan.

### 6.12. Green & Blue Infrastructure



Section 2.3 of the Planning Scheme sets out a number of key principles for green and blue infrastructure, including *inter alia*:

- To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change;
- To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems;

Fig. 29 – Extract from Figure 2.3.1 “Green Infrastructure” in Planning Scheme.

As can be seen from Figure 2.3.1 of the Planning Scheme a local green corridor is proposed running east-west through the application site which represents the Clonburriss Southern Link Street (CSLS) which has been granted permission in August 2021 under planning reference SDZ20A/0021. The proposed development does not affect or propose to alter same and therefore the planning including landscaping proposals along this permitted link street will be as per the permission granted under Ref. SDZ20A/0021.

In the south-east corner of Development Area 2: Clonburriss South East an attenuation pond has also been permitted under Ref. SDZ20A/0021 which was also designed to accommodate the future development potential of the application site. This area is included in the subject application site, however, no changes to same are proposed from that already permitted under Ref. SDZ20A/0021, and also accords with one of the key objectives for Development Area 2 i.e. “To provide significant and integrated SUDS infrastructure, including a high amenity retention pond/lake within a new strategic open space at Cappaghmore”.

This application for permission is accompanied by an arboricultural assessment and details landscaping proposals which seek to retain existing hedgerows on site, particularly in the main area of open space within the proposed development. Approx. 202 linear metres of the existing north-south hedgerow are to be retained. The submitted



arboricultural assessment refers to the permitted infrastructure under Ref. SDZ20A/0021 and also sets out mitigation measures – please refer to this enclosed report and associated drawings prepared by Arborist Associates. In addition, the submitted landscaping proposal prepared by RMDA Landscape Architects provides details of the proposed hedgerow (i.e. new native hedgerow) to be planted along the perimeter of the site.

### 6.13. Open Space Provision

Section 2.10 of the Planning Scheme “Landscape and Open Space” states that the overarching principle is to: *“To provide attractive, interesting and well used outdoor spaces using the latest place making and urban design principles, creating a pedestrian-centred environment with active, inviting public space, parks and private gardens”*. Please refer to the submitted Landscape Rationale prepared by RMDA Landscape Architects for details of the landscape strategy applied to the proposed development.

Table 2.13.1 of the Planning Scheme sets out the following minimum “Local Parks and Squares” requirement for the Development Areas and associated sub-sectors. The following are the relevant criteria for the subject application site:

- Clonburriss Urban Centre: CUC-S4 – 3,600sq.m;
- Clonburriss South-East: 4,300sq.m.

#### 6.13.1. Public Open Space

In accordance with the framework set out in the SDZ Planning Scheme, the main area of public open space is to be provided in the northern part of the site in the form of a north-south park, which includes retention of the existing hedgerow. The public open space extends along the northern boundary of the site and into/along the eastern boundary of the site, under which permitted surface water attenuation is to be delivered (under Ref. SDZ20A/0021). In total, this area accounts for 10,698m<sup>2</sup> of public open space which exceeds the minimum requirement for open space as per Table 2.13.1 of the Planning Scheme, and equates to c.17% of the overall application site area. The central park is planned as a key organising element within the design and layout of the proposed development. While the park will ensure the greatest area of protection for the central hedgerow to be maintained, it will also provide a clear sense of place and orientation for the residents within the scheme, being equally accessible from both the east and the west. The permitted Link Road scheme further provides pedestrian and tucan crossing points connecting the areas south of the Link Road to the park and the proposed bus stops are also proposed close to entrance to the park

The location of the public open space has been carefully considered whereby attenuation and suds will be integrated to complement its biodiversity and ecological quality. The proposed landscaping design has been prepared by RMDA Landscape Architects and caters for natural play space for children. Please refer to the enclosed RMDA Landscape Architects drawings and rationale document for details of the proposals.

In addition to the aforementioned public open spaces provision, it should also be noted that a civic plaza is proposed as public open space, which is located to the south of Block A, announcing the entrance to the scheme. It occupies an area of c.1,116m<sup>2</sup> and is designed as an urban squares in accordance with the Design Criteria for the landscape elements as set out in Table 2.10.3 of the Planning Scheme. A visualisation of same is enclosed in the submitted Architectural Design Statement and as per the foregoing Fig. 23 on page 37 of this report.

#### 6.13.2. Communal Open Space

The proposed apartment buildings Blocks A and B accommodate 72 no. 1 and 2 bed apartments. In accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, these units require 450m<sup>2</sup> of communal open space. To the side/north of Block A, an area of dedicated communal



open space of c.389m<sup>2</sup> is provided for, while adjacent to / south of Block B another area of communal open space of c.357m<sup>2</sup> is provided for. Combined, these two areas provide for 746m<sup>2</sup> of communal open space which exceeds the minimum requirement. These areas of communal open space will be delineated by a 1.2m high bowtop metal railing in order to separate same from the public realm. This space will be in the charge of a management company and the residents of the apartment buildings will have direct access to same.

### **6.13.3. Private Open Space**

Each of the proposed houses has been provided with private open space in the form of private rear gardens. Please refer to the enclosed site layout plan (drawing no. P-1001) which details the quantum and form of private open space. All of the houses have been provided with the necessary private open space meeting the standards of the Development Plan, i.e. 55sq.m for a 2 bed house, 60sq.m for a 3 bed house and 70sq.m for a 4 bed house.

The proposed ground floor apartments have private open space in the form of ground floor terraces while the duplex units overhead have balconies at first floor level overlooking the adjacent communal open space. A full breakdown of the private open space for the proposed dwellings are detailed on the enclosed plans for same as well as the enclosed HQA – please refer to same.

### **6.14. Physical Infrastructure / Services**

Proposals for the provision of services / infrastructure have been prepared by Pinnacle & Associates Consulting Engineers and are described in the enclosed engineering drawings and reports – please refer to same for details.



## 7.0. Phasing

- 7.1.** Table 4.2 of the Planning Scheme identifies the infrastructure required to be linked to the delivery of residential development and phased in accordance with the construction of residential units. Table 4.3 sets out the phasing for the overall scheme, with the phasing programme based on the premise that the number of dwelling units that may be constructed and occupied in each phase of development is dependent on a predetermined amount of works to provide infrastructure, services, facilities and amenities having been completed to serve each phase.
- 7.2.** Table 4.3 of the Planning Scheme sets out the phasing programme for the development of the SDZ lands. A number of important prior to commencement plans / strategies are required to be prepared. These are a Surface Water Management Plan to implement the Surface Water Strategy, a Parks and Landscape Strategy, and Water and Wastewater Plans. It is noted that the preparation of these plans / strategies by landowners will require coordinated responses on the detailed infrastructural provisions, together with agreement with the Development Agency, as well as with Irish Water in many instances.
- 7.3.** The Planning Scheme does not specify a commencement location for the construction of residential units for any phase of residential development. The location for commencing development in the Planning Scheme and within Development Areas is flexible. However, apart from exceptional circumstances, when development commences in a Development Area, subsequent permissions and development in the subject Development Area shall be required to integrate with the previous development in a sequential way.
- 7.4.** The Phasing Table (Table 4.3) for the Planning Scheme details a schedule and programme to plan and deliver strategic infrastructure and amenities on a phased basis, in tandem with the development of residential units in the Planning Scheme. The phasing programme is based on the premise that the number of dwelling units that may be constructed and occupied in each phase of development is dependent on a predetermined amount of works to provide infrastructure, services, facilities and amenities having been completed to serve each phase. As such, in the event that the minimum requirements of the Phasing Table are not delivered for a particular phase, a restriction on the construction and occupation of residential units in the next phase will apply.

<b>Phase 0 Prior to commencement of development requirement</b>	<b>Current Status</b>
Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.	Surface Water Strategy Agreed
Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.	Biodiversity Management Plan has been submitted to SDCC.
Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council.	This has been approved by SDCC.

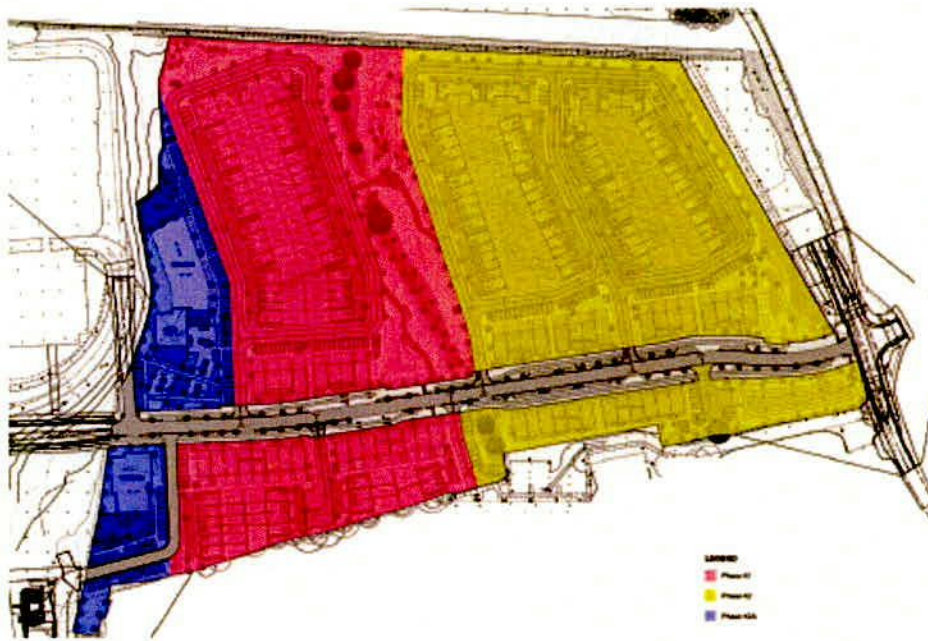


7.5. It is noted that the plans and strategies above are required to be agreed prior to commencement of development, however, it is our understanding that the absence of agreement does not preclude the Planning Authority from permitting development. It is our understanding that the agreed and draft plans and strategies will be considered as part of the assessment of this planning application.

Phase 1A 0-1,000 Residential Units Constructed and Occupied Requirements	Current Proposal
Retail Core development in accordance with the Place Making Requirements.	Retail core will be developed in separate application in the relevant Development Areas / Sub-Sectors
Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station & completion of the realignment of Lock Road (R120)	This requirement is Not Applicable to the Clonburris Urban Centre and Clonburris South East Development Areas
Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC	Noted.
The planning of works for the provision of community floor space and the availability of childcare spaces	<p>A creche and retail / commercial units is provided in current application.</p> <p>There is a concurrent application under Ref. SDZ21A/0022 which includes an innovation hub (626sq.m)</p>

7.6. The current proposal is for 294 no. dwellings, which along with a concurrent application for 569 no. dwellings, which combined are below 1,000, it is considered that the minimum requirements of Phase 1A are not relevant to date.

7.7. For the proposed development of 294 no. dwellings, creche and retail/commercial unit, it is envisaged that this will be delivered in three phases. Phasing is proposed in tandem with the delivery of the Link Road which will include a new junction off the Fonthill Road. It is intended to deliver the park and area of development west of the park during phase 1, with construction followed by the area east of the park during phase 2 and finally the apartments, creche and retail plaza as phase 3.



**Fig. 30 – Proposed phasing:**

**Yellow = phase 1 - 119 no. units**

**Pink = phase 2 – 103 no. units**

**Blue = phase 3 – 72 no. units,  
creche & retail/commercial unit.**



## 8.0. Part V Proposal

- 8.1. Our client intends to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of South Dublin County Council with respect to the provision of Social & Affordable Housing. In the event of a condition, in respect of Social & Affordable Housing, being attached to a grant of planning permission, our clients will comply with the Council's requirements.
- 8.2. In the case of this proposed residential development of 294 no. units, the applicant fully intends to comply with the provisions of Part V of the Planning and Development Act 2000 (as amended) and with the requirements of the Housing Department in relation to the provision of Social & Affordable Housing, in the event of a condition for the provision of same being attached to a grant of permission for this development. To this end, it is proposed to satisfy the 20% requirement and we enclose indicative costings re same. The proposed social housing units are 20 no. 1 and 2 bed apartments in Apartment Block B and 12 no. 2 and 3 bed duplex units in Duplex Block B. In addition, 30 no. 2 and 3 bed duplex units are proposed to be provided as affordable housing units, located in Duplex Blocks A, B, G and H. The location of these units can be identified on the submitted drawing no. PL001PLA-04 "Part V Proposal". This proposal put forward by the applicant is subject to agreement with the Housing Department of South Dublin County Council prior to the lodgement of a commencement notice, in accordance with the relevant statutory provisions. The applicant encloses as part of this application the necessary details in relation to Part V proposals for the purposes of validating this application for permission. The units to be acquired and acquisition prices etc. are to be agreed subsequent to a grant of permission and prior to lodgement of commencement notice. We acknowledge that there is a Part V requirement of 20% so in this case that equates to 59 no. units, which is subject to a grant of permission, however, should the number of permitted dwellings be less than the current proposal of 62 no. social and affordable housing units, then it is considered that the Part V requirement may be less than 59 no. units.
- 8.3. Please note that the Part V proposal, including drawings and costs, were submitted to the Housing Department of SDCC prior to the lodgement of this application. Please refer to the enclosed costings and a letter from the SDCC Housing Department (dated 14.06.2022) confirming that the applicant has engaged with them prior to the submission of this application.



## 9.0. Appropriate Assessment

- 9.1. An Appropriate Assessment Screening Report of the proposed development on the subject lands was undertaken by RSK and is included as part of this application – please refer to same. Article 6(3) the 'Habitats' Directive 92/43/EEC requires that an “appropriate assessment” be undertaken for any plan or project that is likely to have an impact on a Natura 2000 site i.e. a Special Area of Conservation (SAC) or a Special Protection Area for Birds (SPA).
- 9.2. Article 6(3) requires a thorough application of the requirement to undertake an appropriate assessment of the ecological implications of any plan or project, whether within or outside of a designated site, which may impact upon its stated conservation objectives.
- 9.3. The Appropriate Assessment procedure is a two-step process, involving an initial screening of the plan or project to determine the likelihood of potential impacts arising from the plan and then when necessary, a second step involving a process of appropriate assessment where a potential impact has been determined during the screening process which cannot be avoided or mitigated against.
- 9.4. The Appropriate Assessment Screening Report has been undertaken in accordance with Guidance produced by DOEHLG in 2009 and documents produced by EU “*Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC*”. The first stage in Appropriate Assessment is the production of a Screening Report. The aim of screening is to discover whether the project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. The methodology adopted in the enclosed Screening Report follows that recommended in the DOEHLG Guidelines. It follows a logical sequence and ensures that the recording and reporting of information is manageable and proportionate.
- 9.5. RSK ecologists have carried out the enclosed Appropriate Assessment Screening Report, please refer to same for details. The guidance document published by the Department of Housing, Planning and Local Government (then DEHLG) ‘*Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities*’ (2009) recommends a distance of 15km as the precautionary Zone of Influence (ZOI) for a plan or project being assessed for likely significant effects on European Sites, stating however that this should be evaluated on a case-by-case basis, with sites outside 15km included in the assessment depending on the likely impacts of the project and the sensitivities of the ecological receptors, bearing in mind the precautionary principle (e.g. where a hydrological pathway is present it may be necessary to assess sites outside the 15km limit). As such, the 15km ZOI is used in the submitted AA Screening report as an initial starting point for collating European sites for AA screening.
- 9.6. The following European Sites are within the potential zone of influence of the proposed development:
- Rye Water Valley SAC – 6.5km to the north-west;
  - Glenasmole Valley SAC – 8.3km to the south-east;
  - Wicklow Mountains SAC – 10.5km to the south;
  - Wicklow Mountains SPA – 12.5km to the south;
  - South Dublin Bay SAC – 12.4km to east;
  - South Dublin Bay & River Tolka Estuary SAP – 12.4km to the east;
  - North Dublin Bay SAAC – 15km to the north-east;
  - North Bull island SPA – 15km to the north-east.
  - Rockabill to Dalkey Island SAC – 20.6km to the south-east;
  - Howth Head SAC – 20.7km to the north;
  - Howth Head Coast SPA – 23.3km of the north;
  - Ireland’s Eye SAC – 23.6km to the east.

- 9.7. The submitted AA Screening Report concludes that all European sites with a potential connection to the site of proposed development at Clonburriss SDZ under the source-pathway-receptor model were assessed for any likely





significant effects of the development on their qualifying interests. The potential Zone of Influence was considered to extend up to 23.6 km from the proposed development. All potential significant effects were ruled out based on either a lack of connection, the small magnitude or low likelihood of effects based primarily on the substantial distances separating the source and receptor. It is therefore advised that the Appropriate Assessment process need not proceed any further and can be concluded with this Stage One screening report.



## 10.0. Ecological & Environmental Impact Assessment

### 10.1. Ecological Impact Assessment

The applicant engaged the services of RSK to prepare an Ecological Impact Assessment (EclA) of the proposed development, and a copy of same is submitted as part of the this application for permission – please refer to same for further details. A summary of the EclA is as follows:

The proposed development is part of the Clonburriss Strategic Development Zone Planning Scheme developed by South Dublin County Council. The 6.3Hha site is to contain a housing estate with 294 residential units. Its proximity to the Grand Canal pNHA and the undeveloped lands of the SDZ which extends to the west across the R113 should be considered when assessing the ecological impacts of the project. Undeveloped lands are becoming increasingly scarce in the greater Dublin area as the city expands and regional policies must ensure that there is no overall loss of biodiversity.

No residual effects are envisaged on any EU designated sites; the closest that has a pathway of connection to the proposed development is 10.5 km away. The hydrological connection of the Site to Dublin Bay is weak and the proposed development is unlikely to have any effect on its water quality. However, bird species from coastal SPAs spend time foraging inland and they utilize the open fields that are subject to regular flooding in winter

The Site is poorly connected with the wider landscape but does contain a number of internally connecting hedgerows and there is access to the Canal to the south. This means the Site provides good foraging ground but is unlikely to be used extensively by larger mammals such as badger. It provides nesting and foraging habitat to a range of bird species. There are a number of non-regulated invasive plant species present on the Site, removal of which could be considered a Site enhancement. A number of pools of standing water in ditches form potential habitat for amphibians.

After assessment of the key ecological receptors on the Site and the likely impact of the proposed development, it was found that the proposed mitigation measures cannot fully prevent residual adverse impacts. A number of compensation measures are proposed, including the erection of bat and bird boxes, the set aside of an area of land to be managed for wildlife and the compensatory planting of native hedgerows and trees. The creation of pools suitable for amphibians can be done as a compensation or enhancement.

Further surveys for bats, newts, breeding birds and barn owl are recommended prior to commencement of further works. These will inform the need for certain compensatory measures. Monitoring surveys are recommended after construction to assess the effectiveness of certain measures.

### 10.2. Environmental Impact Assessment

RSK has also prepared the submitted Environmental Impact Assessment (EIA) Screening Report and Statement in accordance with 299B (1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended. The objective of this report is to determine whether an Environmental Impact Assessment Report (EIAR) is required for the proposed development as set out in the mandatory and discretionary provision for the Planning and Development Act, 2001 as amended (the Act) and Schedule 5 of the Planning and Development Regulations, 2018 as amended (the Regulations), which has been prepared to provide supporting information to assist the competent authority, in this instance South Dublin County Council (SDCC), in determining whether an EIA is required for the proposed development.

The requirement for a 'sub-threshold' development to be subject to EIA is determined by the likelihood that the development would result in significant environmental effects which may arise due to location or characteristics of the development. Environmental Impact Assessment (EIA) is a process for identifying the likely significant consequences of a proposed development on the biological, physical and human environment prior to development consent being awarded. The purpose of the 299B Statement is to accompany the Environmental Impact



Assessment (EIA) Screening Report and provide the information required in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001 (as amended) ("The Regulations"). The submitted EIA Screening Report has been prepared with input from the design team to ensure that all potential effects as a result of the development have been considered within the EIA Screening process.

The submitted EIA Screening report asserts that the proposed development has been assessed against the screening criteria specified in the EIA Regulations. This has demonstrated that the proposed development is significantly below the thresholds set out in Class 10 (b)(i), (iii) or (iv) Part 2 of Schedule 5 of the Planning and development Regulations, as amended in the provision of a housing development.

- The number of housing units proposed is 294 units and will therefore be significantly below the threshold specified in class 10(b)(i).
- The site area is c. 6.3 ha with the Clonburris Strategic Development Zone and is situated in a predominately residential setting, therefore be significantly below the area threshold and "urban development" on lands comprising "other parts of a build-up area" other than a business district specified in class 10(b)(iv).

The EIA Screening Report concludes that having considered the nature, scale and location of the proposal; having regard to the characteristics and location of the proposed development and having regard to the characteristics of potential impacts it is considered that the project is unlikely to give rise to significant environmental impacts.

The EIA Screening Report also states that all recommended mitigation measures and standard best practice methodologies will be employed throughout the construction and operational phase of the development to prevent any risk of pollution and limit and potential disturbance to the surrounding area.

The submitted EIA Screening Report was completed in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended, in respect of the proposed application for Clonburris, Dublin 22 on lands located within the Clonburris Strategic Development Zone. It should be read in conjunction with the reports referred and submitted with the planning application. It details how the available results of all relevant assessments of the effects on the environment from the Proposed Development have been carried out pursuant to relevant European Legislation.

The EIA Screening Report concludes that *"this Statement, in conjunction with the EIA Screening, has determined that, based on best scientific knowledge, the Proposed Development is unlikely to result in significant effects on the environment and, as such, an Environmental Impact Assessment is not required"*.

For full details regarding the environmental impact assessment screening undertaken for the proposed development, please refer to the submitted EIA Screening Report prepared by RSK which is submitted as a separate document.



## 11.0. Public Lighting / Utilities

11.1. We enclose a Public Lighting layout plan for the proposed development, which has been prepared in conjunction with the landscaping proposals. Also submitted as part of this application are:

- Energy Statement
- Utility Statement
- Communications Assessment

11.2. All of the aforementioned have been prepared by BBSC and are submitted as separate documents – please refer to same for further details.



## 12.0. Archaeology

- 12.1. Section 2.12 of the Planning Scheme deals with Archaeology, with a key principle being to ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process. Section 2.12.3 requires that Applications for development within the SDZ lands should therefore be accompanied by desktop analysis and field survey work carried out by a licensed archaeologist. In accordance with same, IAC Archaeology has prepared the submitted Archaeological Impact Assessment report to study the impact, if any, on the archaeological and historical resource of a proposed residential development.
- 12.2. Archaeological testing was carried out over the course of one day on 22<sup>nd</sup> March 2021 using a mechanical excavator fitted with a flat grading bucket. A total of 6 trenches (426 linear metres) were excavated which targeted the remaining greenfield areas that were not subject to an earlier program of archaeological testing (that was applied to a larger development zone). This program of archaeological testing focused on a smaller development area which represents this planning application. One trench, trench 7 was not excavated as it was within the exclusion zone of an ESB Powerline crossed the site. Archaeological testing revealed no features or deposits of archaeological significance.
- 12.3. It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. Any further mitigation will require approval from the National Monuments Service of the DoHLGH.



## 13.0. Conclusion

- 13.1.** The proposed development site lies within the Clonburris Strategic Development Zone (SDZ) and is currently in greenfield, underutilised condition. It has been strategically identified by Government as delivering housing. This application represents the first phase of development of our client's lands within the SDZ. As outlined earlier in this report, as well as in other accompanying documentation, permission has been granted for strategic roads and infrastructure to serve the SDZ lands, and the permitted works include elements on our client's lands, such as the Clonburris Southern Link Street that runs in an east west direction through the site, which will provide access to the proposed development from the Ninth Lock Road to the east and the Fonthill Road to the west. Drainage infrastructure including surface water attention is also permitted on our clients' lands. The aforementioned permitted roads and drainage infrastructure will not be altered by the current proposed development but have been designed to ensure that the proposed development can be serviced. Taking all of the foregoing into consideration, the proposed development is being put forward for permission as it is considered to be an efficient use of zoned serviced land. The site can architecturally support a development such as that currently proposed, which has the capacity to stand on its own merits using plot proportions, heights and traditional materials. The proposed development is modern with a use of traditional materials throughout, and will successfully contribute to the creation of a new, urban residential character in Clonburris. We assert that the development is acceptable in terms of use, residential density and mix of dwelling types.
- 13.2.** The proposed development of 294 no. dwellings provides for a high quality design of varying dwelling types that is laid out in a traditional manner. The site also enjoys close proximity to a wide range of existing local services and facilities, including the Clondalkin / Fonthill train station to the north-west. As this application is the second housing application on the SDZ lands, with more applications for permission expected in the future, cognisance must be paid to the fact this current application represents the first phase of development in the SDZ. The proposed development accords with the zoning objectives attached to this site, with residential use being an appropriate land use. The development put forward for permission accords with recommended densities while the layout and landscaping will provide for a good level and quality of residential amenity.
- 13.3.** The overall development proposal is the result of informed design decisions that have been the outcome of numerous design team meetings and pre-planning consultation with the Planning Authority. The proposed development is consistent with the SDZ Planning Scheme and comprises a high standard of residential development in accordance with the Department of the Environment, Heritage and Local Government best practice guidelines for Quality Housing for Sustainable Communities, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and associated Urban Design Manual Best Practice Guidelines (both 2009) and the 2020 Sustainable Urban Housing: Design Standards for New Apartments.
- 13.4.** The development of this site for housing, retails/commercial use, creche as well as open spaces is appropriate and we request that the Planning Authority positively considers this application for permission to allow development to proceed such that much-needed housing can be delivered. The quantum of dwellings put forward for permission is pragmatic in terms of delivering a viable development and providing for much needed housing and therefore ought to be granted permission.
- 13.5.** Please also refer to the accompanying architectural design statement, architectural drawings, drainage and roads/traffic engineering documentation as well as the landscaping proposal and arboricultural impact assessment etc., all of which have informed the proposed design strategy for the proposed development.
- 13.6.** We trust that the Planning Authority will give due consideration to the merits of this application and we look forward to a favourable decision to grant permission in due course, as we consider the development being applied accords with the proper planning and sustainable development of the area and also accords with the Clonburris SDZ Planning Scheme.



Yours sincerely,

A handwritten signature in blue ink that reads "Tracy Armstrong".

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Tracy Armstrong, MRUP MIPI MRTPI  
**Armstrong Fenton Associates**

