



 **Future** Analytics

Planning Report

Tay Lane, Rathcoole Age-Friendly Development

On behalf of
Riverside Projects Limited

August 2022

Document review and approval

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1.0 Introduction

KPMG Future Analytics ('KPMG FA') of 1 Stokes Place, Dublin 2 have been instructed by Riverside Projects Limited to prepare this Planning Report to accompany the application for an age-friendly residential development at lands located to the east of Tay Lane, Newcastle Road, Rathcoole, Dublin 24. The Proposed Development comprises a single 4-storey apartment block containing 58 no. self-contained age-friendly units with associated shared amenity facilities, high quality open space and parking. This application addresses the urgent need to provide additional purpose-built age-friendly housing in South Dublin to meet the increasing demand for this type of accommodation as highlighted in the Development Plan which is being driven by demographic change. The development is sought to be delivered in conjunction with AHB Clúid Housing which has considerable experience in the management of age-friendly housing schemes.

1.1 Purpose of the Report

This report outlines and summarises the key planning and development considerations of the proposed scheme in support of attaining a grant of permission by South Dublin County Council. It incorporates the following aspects:

- A description of the site location and context.
- An overview of the planning history of the site and surrounding properties.
- A detailed account of the consultation process carried out with South Dublin County Council.
- An overview of planning policy and guidance.
- A detailed description of the proposed development.
- Assessment of the principal planning considerations.

This report details how the 'Plan Approach' has been taken into consideration in the design of the Proposed Development in accordance with Policy QDP2 Objective 1 of the South Dublin County Development Plan 2022-2028 ('the Development Plan'). Specifically, it demonstrates how the Proposed Development aligns with the eight overarching principles for the achievement of successful and sustainable neighbourhoods.

This planning application including the enclosed drawings, public notices, and application form, have been prepared in accordance with the requirements of the Planning and Development Regulations 2001, as amended ('the Regulations').

1.2 Statutory Description

Planning permission is being sought for the following proposal (the Proposed Development):

'The construction of a four-storey apartment block (4224 sq.m) consisting of 58no. age-friendly residential units comprising 20no. 1-bedroom units and 38no. 2-bedroom units with associated private balconies, associated lift and stair cores, entrance lobby, and circulation space. The proposed development will also include the provision of a community facility (99.3 sq.m) and ancillary accommodation including refuse store (26.9 sq.m), cycle store (36 sq.m), plant room (46.2 sq.m), sub-station (14 sq.m), switch room (16 sq.m), landscaped public open space (907.4 sq.m) and communal open space (1225.6 sq.m), and 30no. car parking spaces and 80no. cycle parking spaces to serve the development. Vehicular access to the development will be provided via an upgraded entrance from Tay Lane with a minor pedestrian access provided from Eaton Drive to facilitate direct linkages to the town centre. Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development including the provision of internal access roads and pedestrian /

cycle pathways and linkages, boundary treatment, public lighting, hard and soft landscaping, services, rooftop PV panels and associated signage.'

1.3 Submitted Application Documents

The design of the Proposal has been informed by various technical assessments. We refer throughout this report to the following drawings and documents enclosed with this application:

Requirement	Author
PLANNING PARTICULARS	
Cover Letter	KPMG FA
Planning Application Form	KPMG FA
Site Notice	KPMG FA
Newspaper Notice	KPMG FA
Part V Costs	Applicant
Schedule of Accommodation (see Architectural Design Statement, Section 9.0)	PAC Studio
Letter of Consent	Coalbrook Properties Limited
Letter of Support from Clúid Housing	Clúid Housing
DRAWINGS	
Site Location Plan (@1:1,000)	PAC Studio
Site Layout Plan (@1:500)	PAC Studio
Architectural Drawings	PAC Studio
Part V Compliance Drawing (dwg no. RATH A2-60)	PAC Studio
Architectural Drawings Schedule	PAC Studio
Landscape Plan	Gannon & Associates
Tree Survey	Gannon & Associates
Landscape Document Issue Sheet	Gannon & Associates
Engineering Drawings	CORA
Engineering Drawings Schedule	CORA
REPORTS	
Planning Assessment Report	KPMG FA
Architectural Design Statement (Incl. Housing Quality Assessment)	PAC Studio
Landscape Design Rationale (Incl. Green Space Factor Worksheet)	Gannon & Associates
Townscape and Visual Impact Assessment (Incl. Photomontages)	Gannon & Associates
Daylight Analysis and Report	PAC Studio
Engineering Services Report & Flood Risk Assessment ('Engineering Report')	CORA
Traffic Assessment and Mobility Management Plan (TAMMP)	Martin Rogers
Environmental Noise Assessment & Design Recommendations ('Noise Assessment')	Allegro Assessment
Archaeological Desk Based Assessment Report	Colm Flynn

Requirement	Author
Tree & Hedgerow Survey Assessment, Management, Mitigation & Protection Measures ('Tree & Hedgerow Survey report')	Gannon & Associates
Ecological Impact Assessment Report	Gannon & Associates
Report to Inform Screening for Appropriate Assessment	Gannon & Associates
Building Lifecycle Report	PAC Studio
M&E Strategy Report	JV Tierney
Fire Strategy Overview Report	Eammon O'Boyle Associates
External Lighting Strategy (Incl. Proposed Site Lighting Layout Plan)	JV Tierney
Energy Analysis Report	JV Tierney
Energy Assessment Form	JV Tierney & PAC Studio

2.0 Subject Site

2.1 Site Location and Surrounds

The proposed development is to be delivered on a site measuring c.0.473 ha located east of Tay Lane, Rathcoole, Dublin 24 (the Site). The site boundary and its proximity to surrounding public transport, shops and services is illustrated in Figures 2.1 – 2.3. The Site is located within Rathcoole town centre approximately 20km southwest of Dublin city centre and 10km west of Tallaght town centre. The site topography slopes gently up from Tay Lane and is bounded by adjacent sites north and south opening up to a larger area which remains relatively level towards the northern N7 dual carriageway boundary.

The Site represents a sustainable urban infill development opportunity. The Site formerly housed a single-family dwelling but is now in a disused condition and has fallen into a state of disrepair in recent years which detracts from the residential and townscape amenity of the surrounding area. The Site which has a history of residential use. A single dwelling previously occupied the north-eastern corner of the Site with a private access path off Tay Road. The residential access path is largely intact however the rest of the Site has become overgrown with trees/shrubs and the existing boundary walls are in need of structural repair.

The Site sits in-between the well-established residential developments of Eaton Drive to the east and Hillview to the west. Surrounding residential building heights vary from 1.5 up to 4-storeys. The Site is bound to the north by National Road N7 and to the West by Tay Lane. The site is also partly bound by a two-storey Tuath Housing property to the north-west. To the east the Site is bound by Eaton Drive and Eaton Green, a 4-storey apartment complex. To the south the Site is adjoined by a property comprising Glebe House (a Protected Structure), and an existing warehousing/ industrial premises.

The Site location offers excellent connectivity to local amenities and transport links to the wider area. The Site is within walking distance of local shops and community facilities and is well-served by the regional public transport network. Dublin Bus route 69 connects Rathcoole town with the Red Line Luas stop at Teach Saggart and with Dublin City Centre, Hawkins Street. This route is available from Rathcoole Village stop at less than 100m from site. Go Ahead Ireland routes 126 and 125 connecting Newbridge to Dublin City Centre is available at 20 minute intervals from Rathcoole Slip Road stop located at 260m from site entrance via footbridge across N7. Residents of the scheme can also access Red Line Luas from the Teach Saggart stop located within 10 minutes drive time of the Site.

Figures 2.1, 2.2 and 2.3 show community facilities located in the vicinity of the Site. In order to adequately illustrate the distance from the Site to local amenities and facilities, a 100m, 200m and 500m radius around the subject site has been used on the below maps. Specifically, it was considered prudent to incorporate these three different radiuses around the site to highlight the different walking distances of facilities, particularly given varying mobility levels of future elderly residents.

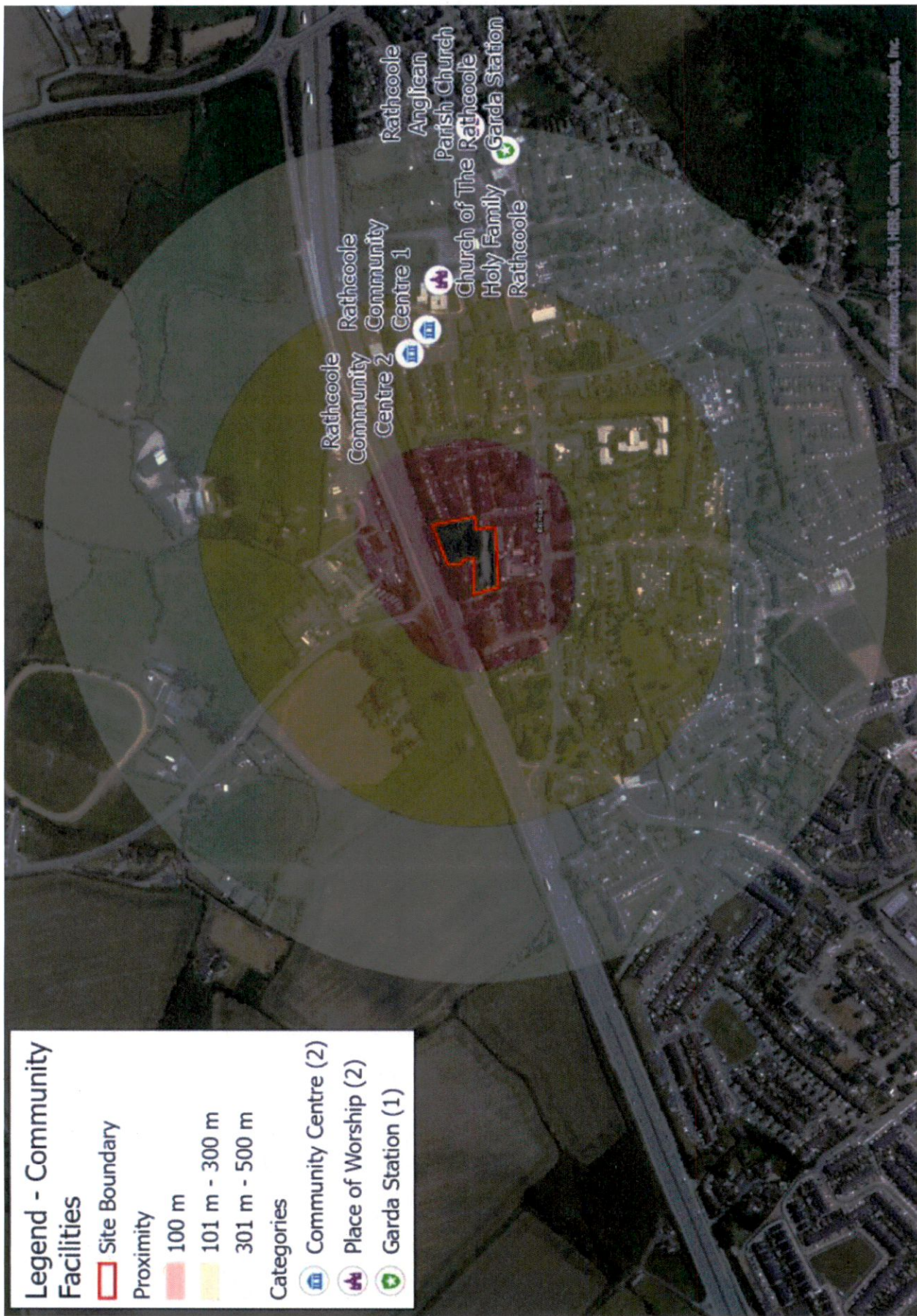


Figure 2.1 Community and Religious facilities within proximity to the subject site



Figure 2.2 Healthcare facilities within proximity to the subject site

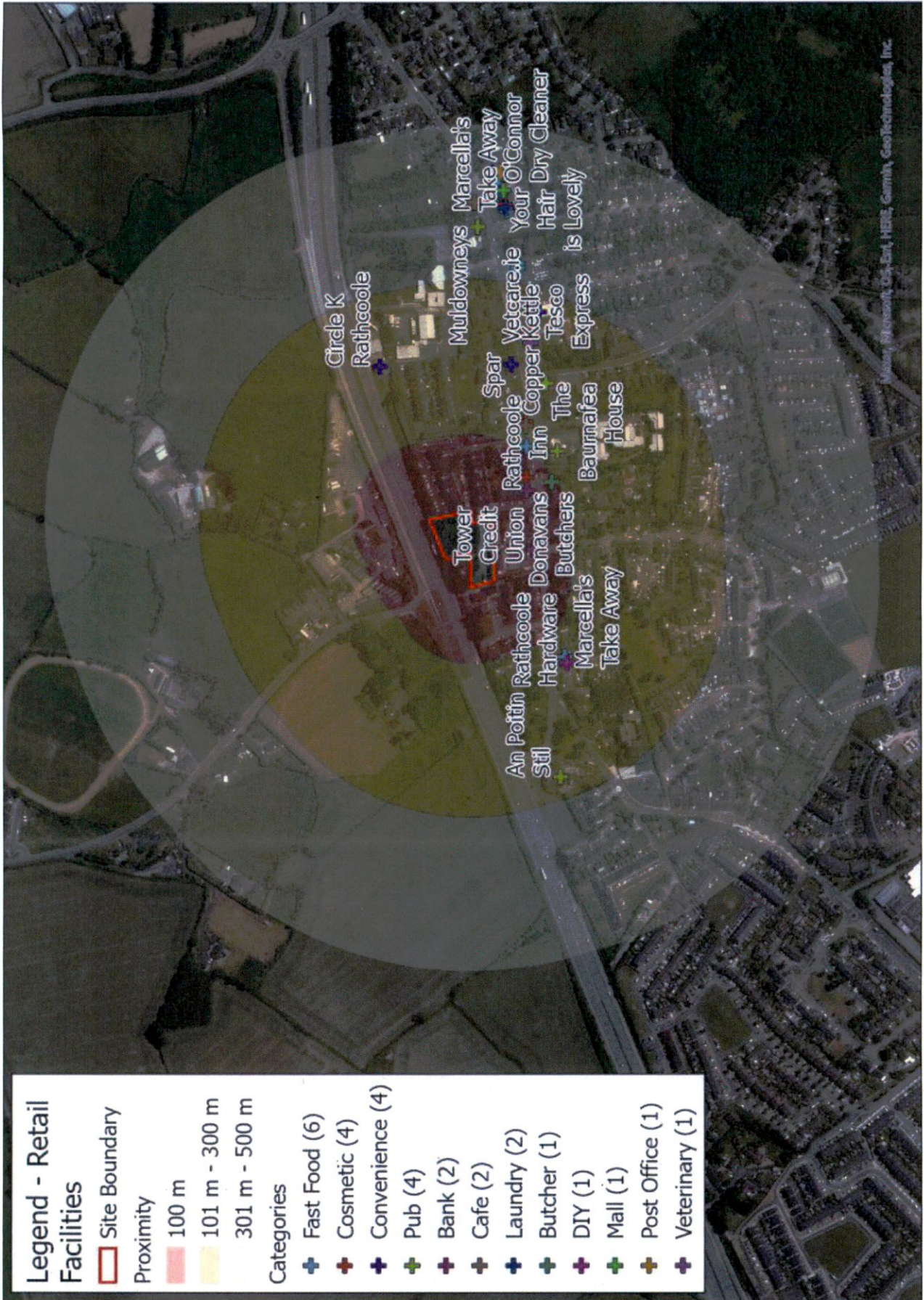


Figure 2.3 Retail facilities within proximity to the subject site

3.0 Planning History

This section provides an overview of relevant planning history for the Site, details of precedent apartment schemes on adjacent sites and identifies the planning pipeline of new elderly care facilities in South Dublin.

3.1 Site Planning History

The Site has an extensive planning history, having been the subject of a number of planning applications for redevelopment since 2000. Table 3.1 presents a summary of historic planning applications relating to the Site.

Table 3-1 Site Planning History

Reference(s)	Applicant & Development Description	Decision	Decision Date
Pl. Reg. Ref. S00A/0412 ABP Ref. PL062.121282	Coolbrook Properties Demolition of dwelling and erection of residential development to include: (1). Two storey pitched roof terraced block with roof level accommodation and dormers over, comprising 7 no. houses. (2). Two storey pitched roof block with roof penthouse level accommodation and dormers over and basement level parking, comprising 33 no. two bedroom apartments. (3). Relocated entrance way, car parking and all associated site works.	Application: Refuse Appeal: Refuse	14/08/2000 12/01/2001
Pl. Reg. Ref. S01A/0431 ABP Ref. PL06S.127289	Coolbrook Properties Demolition of dwelling and erection of residential development to include: (1). Block A - two storey building with roof penthouse level over, comprising 10 apartments (2). Block B - two storey building with roof penthouse level over, comprising 25 apartments (3). Re-located entranceway, car-parking, bin storage and all associated site works. A protected structure (St. Brigids Well) is located on the site of the proposed development.	Application: Grant Appeal: Refuse	09/10/2001 19/07/2002
Pl. Reg. Ref. SD03A/0629 ABP Ref. PL06S.205866	Coolbrook Properties Residential development of 40 no. apartments to comprise of: (1) Demolition of existing dwelling house and outbuildings. (2) Construction of Block A, facing Tay Lane roadway, 2 & 3 storey pitched roofed building comprising 13 no. x 2 bed apts. and 1 no. x 1 bed apt. (3) Construction of Block B, facing the N7 roadway, 2, 3 & 4 storey mansard roofed building comprising 22 no. x 2 bed apartments and 4 no. x 1 bed apts. (4) Relocated entrance way at Tay Lane, access road through to adjoining lands to the east and south, 67 no. car park spaces and all associated site works. (5) A Protected Structure (St. Brigids Well) is located adjacent to the site of the proposed development.	Application: Grant Appeal: Refuse	02/01/2004 31/05/2004

Pl. Reg. Ref. SD05A/0787	George Ray & Jimmy Stanley	Application: Refuse	30/03/2006
ABP Ref. PL06S.217356	Demolition of existing derelict dwelling & construction of 2 no. new blocks - Block A consisting of 4 storey inclusive of penthouse (14 x 1 bed, 10 x 2 bed & 2 x 3 bed townhouses) & Block B consisting of 4 storey inclusive of penthouse (14 x 1 bed, 10 x 2 bed & 2 x 3 bed townhouses) with balconies, terraces & associated landscaping, 84 car-parking spaces accessed from parking granted as part of adjacent Eaton development & provision of bicycle parking, bin-stores & associated site works. A total of 48 apartments & 4 townhouses will be provided within landscaped open spaces & site works. The development is to be accessed via new vehicular entrance at Tay Lane.	Appeal: Refuse	04/09/2006

The Council has sought to grant planning permission for apartment development on the Site on two occasions, first in 2001 for 35 no. units and in 2004 for 40 no. units (Pl. Reg. Ref. S01A/0431 & SD03A/0629). However, on both occasions the applications were refused by the Board following third-party appeals. The Board's previous reasons for refusal in these cases were as follows (summary):

- I. Would seriously injure the privacy and amenities of the adjoining residential property due to its height and massing and positioning of habitable room windows and the internal road route.
- II. The development includes apartments with a poor aspect and outlook (single aspect north facing apartments) which is contrary to the 'Residential Density Guidelines for Local Planning Authorities (1999)'.
- III. The layout of open space is sub-standard and contrary to the 'Residential Density Guidelines for Local Planning Authorities (1999)' - only significant open space is north facing and within the dual carriageway noise corridor.
- IV. The proposed density would result in overdevelopment of the site with reference to the Government's 'Residential Density Guidelines for Local Planning Authorities (1999)'.
- V. Permission for the development would be premature in the absence of an archaeological investigation of the St. Brigid's Well Recorded Monument.

The '1999 Residential Density Guidelines for Local Planning Authorities' are out of date and no longer apply. The height and density of the Proposed Development is justified in Section 7.2 of this report having regard to the statutory 'Sustainable Residential Development' Guidelines (2009) which replaced the 1999 Guidelines. We consider potential impacts on the surrounding residential and townscape amenity in Sections 7.2, 7.3 and 7.4 of this report.

3.2 Precedent schemes

Planning permission has been granted permission for two apartment schemes on surrounding sites in Rathcoole town centre – the Eaton development immediately east of the Site and the Glebe House site which lies immediately to the south. Table 3.2 presents a planning history summary for precedent schemes.

Table 3-2 Surrounding Sites Planning History

Reference(s)	Address, Applicant & Development Description	Decision	Decision Date
Pl. Reg. Ref. SD17A/0036 Amended by SD06A/0734 SD07A/0090	<p>Eaton development site enclosed by Main Street, Eaton Drive, Eaton Way and the N7</p> <p>Jimmy, Ray & George Stanley</p> <p>Demolition of a dwelling and associated out buildings comprising (1) The Bungalow. (2) Errislannan, and (3) the adjacent vacant site to the east, construction to facilitate the relocation of an existing ESB substation, construction of 4 no. 3-storey plus penthouse blocks containing 109 no. apartments (3 x 1 bed, 106 x 2 bed) with associated landscaping, with 2 decks of car-parking with ramp access containing 122 car-parking spaces to the rear of the site. Construction onto Main Street of a 3-storey block containing 2 medical units/offices on the ground floor and apartments over, construction of a 3-storey stepping down to 2-storey block containing creche (441sq.m.) on the ground floor, 2 medical units/offices (253sq.m.), and 2x2 bed apartments on the first floor and 4 no. apartments (2 x 1 bed and 2 x 2 bed) on the second floor, and construction of 3 no. retail units (474sq.m.) with 4 no. office units at first floor level (465sq.m.) within a 2-storey building accessed off Main Street and the existing Shopping Mall. A total of 119 apartments and 191 car-parking spaces will be provided within landscaped open spaces and site works. The development will be accessed from entrances at Main Street, and the Shopping Mall roadway allowing provision for access to other lands in the vicinity.</p> <p>The scheme has a maximum height of 12.12m overall and a maximum height of 11.59m facing onto Main Street.</p>	Application: Final Grant	26/09/2003
Pl. Reg. Ref. SD03A/0238	<p>The Glebe House Rathcoole enclosed by Tay Lane to the west, Main Street to the South and Eaton Drive to the east.</p> <p>LBJ Properties Ltd.</p> <p>A 69-bedroom Aparthotel with reception, restaurant/coffee shop and bar on ground floor function room on first floor with 15 retail units and 4 market stalls. The Glebe House site is zoned residential amenity and Eaton Drive is zoned village centre. The development will consist of the conservation and refurbishment of The Glebe House which has been fire damaged previously and the original interior features destroyed (area 306sq.m); the demolition of ancillary sheds and outhouses. The Glebe House is a Protected Structure (ref. 313) and is in an architectural conservation area and is an area of archaeological potential.</p> <p>The three-storey hotel guest wing facing Eaton Lane has a maximum height of 12.48m. The two-storey hotel guest wing facing Tay Lane has a maximum height of 12.15m.</p> <p>The smaller three-storey mixed retail/apart-hotel block which adjoins the southern boundary of the subject Site also has a maximum height of 12.48m.</p>	Application: Grant Appeal: Grant	01/10/2017 02/11/2018

The proposal has been carefully designed to complement the development proposals for the adjoining Glebe House site as well as to minimise impacts on the Glebe House Protected Structure (ref. 313) and the residential amenity of the surrounding area. At present, the Site detracts from the residential/townscape amenity of the surrounding area. The Proposed Development represents a significant improvement in terms of design quality and will complement proposals to redevelop the neighbouring Glebe House site, including restoration of the Protected Structure. We understand

however that redevelopment of the Glebe House site has not commenced and that the permission is due to expire in November 2023. We detail how the proposed design responds appropriately to its context in Section 7.2 and within the enclosed Architectural Design Statement.

Table 3-3 Proposed and Permitted Nursing Homes in Study Area (5km)

Pl. Ref. Site Address	Address, Applicant and Development Description	Decision	Decision Date
Reg. Ref. SD20A/0153	Millbrook Manor Nursing Home, Slade Road, Saggart, Co. Dublin Saggart Developments Ltd. Permission for 609.5sq.m, 16-bed extension to existing Nursing Home which consists of new 443sq.m two storey 14 bedroom extension adjoining existing building to the west, new 64.3sq.m single storey 2 bedroom extension to south west wing of existing, new 102.2sq.m 2 storey extension of existing dining areas to the north, new garden lawns and walkway with hard landscaped areas to north west of site, 8 new car parking spaces to existing car park to east of site and all associated site works.	Grant	22 Feb 2021 Construction completed
Reg. Ref. SD20A/0054	Boot Road/Convent Road, Fonthill Road & St. John's Road, Clondalkin, Dublin 22 Valley Healthcare Fund Alterations to Ref. SD11A/0135 including a change of use of Block A from nursing home to a primary care use.	Grant	22 Mar 2021 Application expiry date: 22 Mar 2026 Commencement date: 06 October 2021
Reg. Ref. SD18A/0328	Presentation Convent, Convent Road, Clondalkin, Dublin 22 Bartra Property (NH) Ltd. Nursing home building comprising 155 bedrooms and all associated ancillary accommodation (7741sq.m gross floor area); Retirement home building comprising 14 bedrooms and all associated ancillary accommodation (916sq.m gross floor area) in a two storey wing to the south east of the convent and internally connected to the nursing home. The development will be accessed via a vehicular and pedestrian entrances from New Road and will provide a total of 42 car parking spaces and 60 bicycle spaces.	Grant	22 May 2019 Application expiry date: No information provided Commencement date: 4 May 2021
Reg. Ref. SD16A/0278/EP	94-95, Cappaghmore, Clondalkin, Dublin 22. Eriacuram (Clondalkin Nursing Home) Amendments to previous grant of permission SD14A/0157. (GRANTED 2015) Change of use of part	Grant	06 Apr 2021 Application expiry date: 07 November 2023

Pl. Ref. Site Address	Address, Applicant and Development Description	Decision	Decision Date
	first floor plan to create 2 additional bedrooms, alterations and refurbishment of existing nursing home and all associated site works.		
SD14A/0157	94-95, Cappaghmore, Clondalkin, Dublin 22. Clondalkin Nursing Home Demolition of single storey out buildings and wall; construction of two and single storey extensions; alterations and refurbishment and all associated works.	Grant	07 Apr 2015 Application expiry date: 07 November 2023
Reg. Ref. SD14A/0021/EP	Ballynakelly & Rathcreedon, Newcastle, Co. Dublin. Lamberton Properties Ltd. Revisions to granted planning permission Reg. Ref. SD06A/0659 (as extended by Reg. Ref. SD06A/0659/EP) revisions to the permitted hotel development (which is partially constructed) will comprise construction of a retirement village in the permitted hotel grounds which will consist of: 69 individual 3 bedroom single storey retirement homes, ranging in size from 112sq.m. to 164.1sq.m; a single storey medical/health centre (146.7sq.m); a two storey community services centre (844.3sq.m); a nursing home/care centre to be located within the permitted hotel building necessitating a change of use of part of the hotel's accommodation block (1,653.7sq.m. at ground floor and 2,351.5sq.m. at first floor) from hotel use (comprising 92 hotel bedrooms in total) to nursing home/care centre use (comprising 60 nursing home/care centre bedrooms with associated dining, healthcare and administration facilities) as well as change of use of 302sq.m. at basement level car parking to nursing home/care centre mortuary, new 6.4sq.m. porch and a reception area for the nursing home/care centre; new vehicular lay-by and enclosed outdoor areas for nursing home residents (the gross floor space of the hotel incorporating the nursing home/care centre will now be approximately 29,562sq.m.); 2.2m to 2.5m high fencing and automatic gates surrounding the retirement homes.	Grant	23 Apr 2020 Application expiry date: 04 March 2025

As evidenced in table 3-3 above, there is currently no new nursing home provision in the planning pipeline in Rathcoole and relatively little provision for new nursing home facilities in neighbouring Saggart, Newcastle and City West areas, despite significant population growth forecast in South Dublin and demographic trends indicating the need for more facilities for the elderly.

The Proposed Development, if constructed, would provide much needed age-friendly housing in an area which currently has a noticeable shortfall of such housing and would help to free up capacity for those most in need of acute care services (nursing homes). The lack of accommodation for the elderly in the planning pipeline means that capacity issues for more acute care services will be exacerbated if proposals similar to this scheme are not brought forward in the near future.

4.0 Pre-Application Consultation

This section provides a detailed account of the consultation process carried out with South Dublin County Council and Irish Water.

4.1 SDCC Pre-planning Consultation

Members of the design team attended a pre-planning meeting with SDCC officers on 6 April 2020 (ref. PP028/20). A Feasibility Design Report (14 February 2020) was submitted to the Council to inform the pre-planning discussions. The two site layout options presented within the report are illustrated in Figure 4.1 below. Following this, the design team undertook further correspondence with Officers via email and a revised Feasibility Design Report (06 May 2020) was submitted. The Council confirmed in writing on 27 May 2020 that the revised design addressed the pre-planning comments. Table 4.1 summarises SDCC Officers' comments at pre-application stage and details how these have been addressed within the application proposal.

Table 4-1 SDCC consultation comments and design team response

Comment	Response
Design comments	
Two site layout options presented – applicant to provide justification / site analysis for chosen option.	<p>Detailed justification for the proposed final site layout is provided in the Architectural Design Statement (refer to Section 2.4 and 3.0) and detailed in Section 7.2 Section 7 of this report. The preferred Option 03 shows the apartment block orientated in a north-south direction located on the eastern side of the Site (adjacent to Eaton Drive) and all apartments have an east or west outlook. The chosen site layout has the following benefits:</p> <ul style="list-style-type: none"> • The narrowest side of the building faces on to Glebe House which minimises views of the Proposed Development in the background of Glebe House and the number of apartments 'over-looking' Glebe House. • East / west orientation of apartments maximises solar gain while reducing the need for mechanical heating. • Achieves minimum residential separation distances and exceeds the required setbacks from the N7 carriageway. • All car parking can be accommodated at the front of the site onto Tay Lane, allowing the remainder of the site to be utilised as a large and varied garden. Further
Needs to be ensured that apartments are designed as age-friendly accommodation - Clúid likely operator.	Section 7.2.6 of this Report and the Architectural Design Statement details how the proposed scheme has been purpose designed for elderly accommodation with reference to Universal design criteria, Clúid Design Handbook and the HIQA bedroom standards.
Site analysis based upon requirements of SPPR3 (of the Urban Development and Building Heights Guidelines 2018) as well as other relevant guidance	Detailed justification for proposed building height is provided in the Architectural Design Statement (see

Comment	Response
should be undertaken to justify proposed building height.	Section 5.0 & 5.5), and in Section 7.2 and Table 7.1 of this report.
Other planning matters	
Subject site zoned RES – ‘To protect and/or improve residential amenity’. Apartments acceptable in principle	None required.
Noise – noise impact assessment required. Apartments will need to be designed to mitigate from adjacent road.	A Noise Assessment is submitted with this application and the findings are reviewed in Section 7.5 of this report which demonstrates that an acceptable internal residential noise environment can be achieved as per established best practice with the design specification and mitigation measures proposed.
Landscape – full tree survey needed. Landscape architect required.	A full Tree & Hedgerow Survey Report and Landscape Design Rationale is submitted with this application and the findings and proposals are detailed in Section 7.3 of this report.
Drainage – attenuation at lower end of site. Twp pumping station at capacity – contact Irish Water.	A Drainage Strategy is contained in the submitted Engineering Report which provides details of engagement with Irish Water and details the proposed water supply, foul and surface water drainage strategy as agreed with Irish Water. The drainage strategy proposals are detailed in Section 7.9 of this report.
Roads – County Development Plan standards apply. Details of lighting required.	An External Lighting Strategy and Proposed Site Lighting Layout Plan is submitted with this application.
Conservation – Visual impact on adjacent Architectural Conservation Area should be taken into account. The Well should also be considered.	An Archaeologist Desktop Study is submitted with this application and the findings are reviewed in Section 7.7 of this report.
Housing Part V – liaise with the Housing department.	Section 7.12 details how the Applicant intends to comply with Part V.
Property Management.	It is proposed that the scheme will be managed by Clúid Housing Association. A Building Lifecycle Report is submitted with this application as detailed in Section 7.11 of this report.

4.2 Irish Water

The enclosed Engineering Report provides details of correspondence between the design team and Irish Water to agree the proposed water supply, foul and surface water drainage strategy.

4.3 Design Evolution

This section details how the design proposal has evolved since the initial Feasibility Design Report (14 February 2020) in response to SDCC consultation comments, engagement with other parties and site-specific constraints.

Building Orientation

The proposal has been rearranged so that the apartment block is now orientated in a north-south bar with all apartments facing east, west or south (shown in Figure 4.2) - there are no north facing apartments proposed.

Access

The proposal provides separate vehicular and pedestrian access. The pedestrian route follows along the southern boundary and leads directly to the main building entrance. It is proposed to connect the proposed access route with Tay Land to the west and Eaton Drive to the east in the interest of improving permeability. The entrance point to the building has been located at approximately halfway along its length which would correspond with the point of access to Eaton Drive.

Open space and landscaping

The pedestrian access avenue would be landscaped as a public open space. Overall, the scheme provides 19% Public Open Space which exceeds the 10% minimum requirement comfortably.

Dual Aspect Ratio

The building footprint has been redesigned to maximise the number of dual aspect apartments. Seven out of ten apartments on each floor (c. 70%) will be dual aspect.

Communal space

A community building has been included adjacent to the entrance to the building and is seen as a garden pavilion type structure which would have excellent aspect and allow the residents to enjoy the facilities within the garden environment.

External Spaces

A shadow analysis is included in the Architectural Design Statement which demonstrates that the gardens and external spaces will enjoy light throughout the day and into the evening, with limited shading from the proposed buildings. The shadow analysis also demonstrates that there is no undue overshadowing of neighbouring properties.

Height of Proposal

The Architectural Design Statement provides contextual elevations/sections which show the height of the proposal in relation to the adjacent Eaton development. Whilst both developments would be four stories tall the finished parapet heights of the Proposed Development would be in c. 1.5m higher than the Eaton development for two reasons; first, the ground floor accommodation is proposed at 500mm above the external ground level and secondly, the Proposed Development allows for more generous ceiling heights of 2700 mm at the ground floor and 260 mm above in line with the National Apartment Standards. The ceiling heights of the adjacent Eaton development are 2450 mm throughout.

Interface with the N7 National Road

The proposal maintains a separation distance from the carriageway in excess of the required minimum 20m setback and no accommodation faces the motorway directly. The enclosed Noise Assessment demonstrates that an acceptable internal residential noise environment can be achieved as per established best practice with the design specification and mitigation measures proposed.



Figure.4.1 Feasibility Design Report (14 February 2020) – Site Layout Options A and B

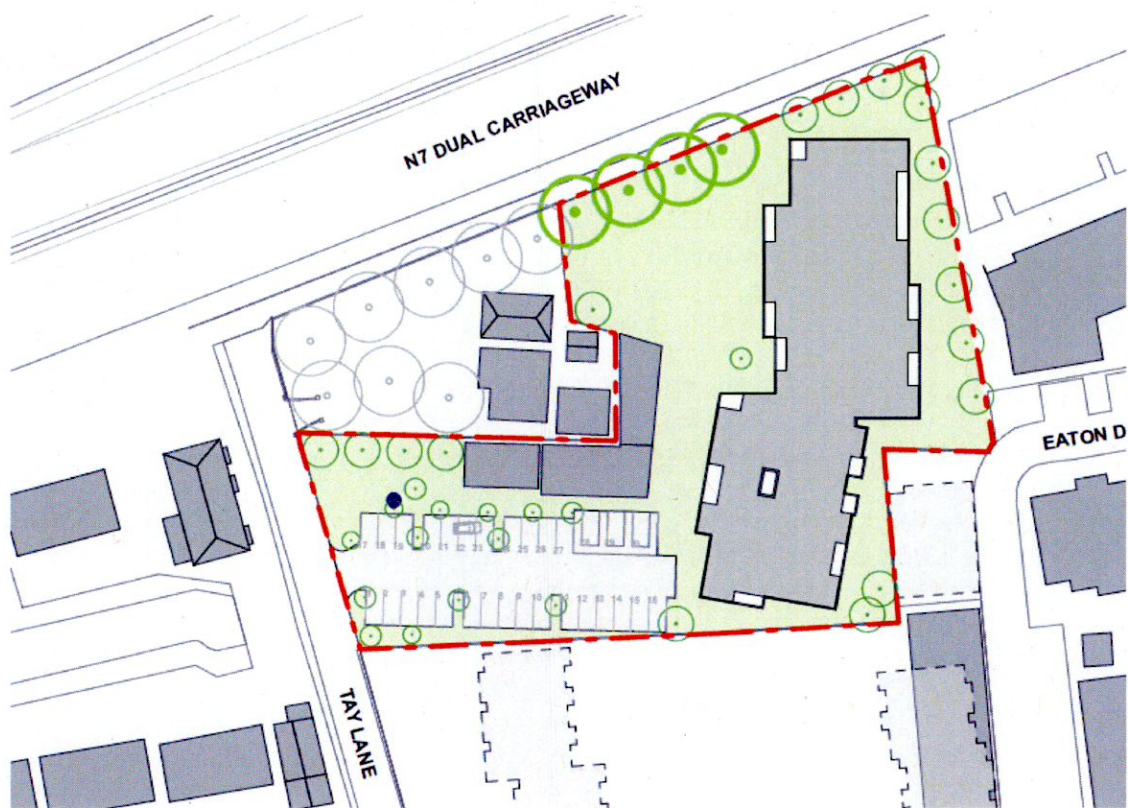


Figure.4.2 Final proposed Site Layout

5.0 Policy and Legislation

This section provides an overview of the legislative and policy context applying to the Site and the Proposed Development. At national level there is a significant body of guidance relating to residential development and the development of residential care facilities in particular. This section is supported by **Appendices 1 and 2**.

5.1 National Planning Policy and Guidelines

5.1.1 National Planning Framework: Ireland 2040

The National Planning Framework (NPF) was published in 2018 setting out the Government's plan to cater for a projected one million additional people living in Ireland by 2040. The NPF forecasts that population growth across the Eastern and Midland region (including South Dublin) will equate to 490,000 - 540,000 people, bringing the total population to around 2.85m by 2040.

At the core of the NPF's strategy is the need to achieve compact and sustainable growth (National Strategic Outcome 1) and to avoid urban sprawl (National Policy Objective 53). The NPF's 'compact growth' objectives include:

- National Policy Objective 3b: "Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints" (p 29)
- National Policy Objective 33: "Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."
- "Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport." (p22)

The NPF recognises that compact forms of growth can provide many benefits, including improving the viability of services, shops and public transport, reduce journey times enabling people to walk more and use the car less, and reducing energy demand (for heating and travel) while at the same time increasing housing supply (p 28).

A key objective of the NPF is to increase residential density in order to achieve the benefits of compact growth. The NPF recognises that infill development and increased build heights will play an important role in increasing densities. The NPF states:

- National Policy Objective 35: "Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."

The NPF acknowledges that infill and brownfield development is more challenging to deliver than greenfield for a multitude of reasons. Integrating new development within existing communities, who may prefer the status quo, is highlighted as a key challenge in this respect. The NPF promotes a flexible approach to the application of planning policies and standards to enable infill and brownfield development focusing on design and performance-based outcomes, rather than specifying absolute requirements in all cases. It also notes that there should be a significantly reduced car parking requirement for development in the inner suburbs of all five cities. The NPF states:

- National Policy Objective 13: *"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected."* (p 67)

The NPF estimates that the number of people aged 65 and over will double to 1.3 million by 2040 comprising approximately 23% of the population, compared to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple by 2040. The need to make sufficient provision for our ageing population now is clear. The NPF emphasises the need to provide better housing options for our ageing population within existing communities and close to existing services and facilities. The NPF states:

- *"It is Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible."*
- *"This further reinforces the need for well-designed lifetime adaptable infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct and accessible walking routes."* (p 86)

This is crystallised in National Policy Objective 30 which states:

"Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans." (p 86)

- The Proposed Development supports the Government's core policy objective of accommodating projected household growth while avoiding urban sprawl by delivering sustainable compact growth and increasing residential densities.
- The Proposed Development will achieve increased residential densities in line with national policy objectives through the sensitive redevelopment of a vacant underutilised brownfield site and increased building height.
- The Proposed Development contributes to the achievement of the NPF's objective to provide at least 50% of all new homes in Dublin within the existing built-up footprint.
- The Proposed Development supports the Government's core policy objective of enabling older people to live independently in their own communities for as long as possible.
- In line with National Policy the Proposed Development is ideally situated to provide age-friendly accommodation - it is within a growing town and close to local shops, community facilities and public transport.

5.1.2 Housing for All - a New Housing Plan for Ireland

Housing for All - a New Housing Plan for Ireland was published in 2021. It sets out the Government's housing plan to 2030. The Government's overall objective is that every citizen in the State should have access to good quality homes to purchase or rent at an affordable price built to a high standard and in the right place offering a high quality of life. The Plan forecasts that 33,000 homes will need to be delivered per annum on average up to 2030 to meet the additional household targets set out in the

NPF. The Plan identifies that new homes need to satisfy demand across four tenures – affordable, social, private rental and private ownership and be constructed within the context of specific development targets for the five cities and major towns.

Our ageing population is recognised in the Plan as being one of the most significant societal developments that the Country will need to respond to in the coming decades. The Central Statistics Office (CSO) projects that the number of people over the age of 65 will reach up to 1.6 million by 2051 which is double the population of that age cohort in 2016.

Section 2.4. of the Plan seeks to increase the housing options available to older people to facilitate ageing in place with dignity and independence, including policies and operational supports for older people considering right-sizing to smaller homes. It states that the Government will work to ensure that older people are supported to stay in their homes and communities for as long as possible and to fulfil the Programme for Government vision of an age friendly Ireland.

The Plan outlines the importance of considering older people in the wider planning process to ensure they have a choice of accommodation options and that their evolving needs are addressed. These options should be delivered as part of a variety of housing typologies to promote social inclusion and ensure elderly persons are part of a community.

The new Local Authority Housing Delivery Action Plans required under *Housing for All* will set out how dedicated social housing provision appropriate to the needs of older people will be delivered, matching the scale and extent of housing need for older people identified. The Plan also states that Local Authorities must also consider the needs of older people in the wider planning process, and this should be achieved through the Housing Needs Demand Assessment process.

- The Proposed Development supports the ambition of *Housing For All* to facilitate ageing in place with dignity and independence by increasing the housing options available to older people in *existing* communities.
- The Proposed Development will increase the quantity and improve the choice of age-friendly housing available to residents from within the town and beyond.
- The Proposed Development is ideally situated to provide housing for older people being located close to local shops, community facilities and public transport.

5.1.3 Urban Development and Building Heights – Guidelines for Planning Authorities

The 'Urban Development and Building Heights Guidelines' were published by the Irish Government in December 2018. It should be noted, first of all, that the 'Guidelines' part of their title is something of a misnomer, as they introduce a number of 'Specific Planning Policy Requirements' (SPPRs) that planning authorities and An Bord Pleanála are required to apply in the carrying out of their functions. The 'SPPRs' contained in the Guidelines take precedence over conflicting local policies or objectives.

The Guidelines further emphasise the focus on 'Compact Growth' that is contained in the NPF and, significantly, they introduce a 'presumption in favour' of additional height in urban locations with good public transport accessibility:

'It is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and other urban locations with good public transport accessibility' (p. 13)

The Guidelines provide for additional height, subject to compliance with the development management criteria contained in Section 3.2. Importantly, **SPPR 3** states that where compliance with the development management criteria can be demonstrated, planning permission may be granted *'even where specific objectives of the relevant development plan or local area plan may indicate otherwise'* (p 15).

The Proposed Development is assessed in detail against the development management criteria referenced under SPPR 3 in **Table 7.1** of this report. The height of the Proposed Development is assessed with reference to its surrounding context and precedent developments in Section 7.2 of this report and the enclosed Architectural Design Statement.

5.1.4 Sustainable Residential Development in Urban Areas

The statutory 'Sustainable Residential Development' Guidelines were published by the Government in 2009 to update and revise the 1999 Guidelines for Planning Authorities on Residential Density. The 1999 Guidelines advised planning authorities to promote increased residential densities due to three driving factors: the trend towards smaller average household sizes; the need to encourage the provision of affordable housing and the need to reduce CO2 emissions by reducing energy consumption in the residential and transport sectors. The need to address the affordability crisis and act on climate change is now more critical than ever.

In this context, the Guidelines recommend that increased densities should be encouraged on residentially zoned brownfield sites within town centres such as the subject Site. A maximum density figure is not provided in the Guidelines, rather it states that the objective should be to maximise the use of land without creating issues of 'overdevelopment'. The Guidelines state there should be no upper limit on the number of dwellings that may be provided within any town centre site subject to the following safeguards:

- comply with public and private open space development plan standards
- conform with urban form, height and massing development plans objectives
- comply with plot ratio and site coverage development plan standards
- achieve good internal space standards
- preserve protected buildings and Architectural Conservation Area and their settings
- avoid undue adverse amenity impacts on neighbours

The density of the Proposed Development is considered in its surrounding context in Section 7.2 of this report and the enclosed Architectural Design Statement.

5.1.5 Sustainable Urban Housing: Design Standards for New Apartments

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities were published by the Government in 2020 as a technical update to the 2018 Guidelines. The purpose of the Guidelines is to provide a consistent set of national design standards for apartments.

The guidelines recognise that apartment development will be crucial to meet forecast housing needs in a sustainable manner while avoiding further urban sprawl as targeted by the NPF. The NPF signals a clear shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to jobs and services. The 2020 Guidelines are prepared in the context of work undertaken by the Economic and Social Research Institute (ESRI) which forecasts a need for around 300,000 new homes in Ireland's cities to 2040, half of which are to be located in built-up areas.

The guidelines state that a dramatic increase in apartment development is required in order to significantly increase housing supply and meet housing demand across the Country. The need for

additional apartment development is driven by a variety of other factors including: a long-term move towards smaller average household size, an ageing and more diverse population, with greater labour mobility, and a higher proportion of households in the rented sector.

Chapter 3 contains national design standards for floor area, safeguarding higher standards, dual aspect ratios, floor to ceiling height, lift and stair cores, internal storage, private amenity space and security in apartments. Chapter 4 contains national design standards for communal facilities including access and services, refuse storage, communal amenity space, children's play space, car parking and bicycle parking in apartments.

The Proposed Development is assessed against relevant National apartment standards in detail in Section 7.2.

5.1.6 Housing Options for an Ageing Population Policy Statement

The need to plan ahead to meet the accommodation needs of an ageing population is reiterated in the 'Housing Options for our Ageing Population' policy statement issued jointly by the Department of Housing, Planning and Local Government and the Department of Health in 2019. The policy document outlines six principles which are intended to guide strategic planning of housing options for older people as follows:

1. Ageing in Place – identifies the importance of providing housing options for older people within existing and new communities to best facilitate social interaction. Housing should also be located close to amenities and services to enhance older people's general independence.
2. Supporting Urban Renewal – identifies that the development of good quality, well connected, urban centres with a range of housing tenures and types is required to enable older people to choose housing that is appropriate to their needs and maintain socially connected lives in their community.
3. Promoting Sustainable Lifetime Housing - all new housing should be reasonably accessible for older people and accord with Universal Design principles. The aim is to ensure that dwellings meet the changing needs of occupants over their lifetime. This will enable older people to remain independent in their own home without the need for costly remodelling.
4. Using Assistive Technology
5. Staying Socially Connected – accommodation should be located in areas where social supports are available and where there are opportunities to integrate and connect with the local community; and
6. Working Together

This policy document emphasises the preferences of elderly people to remain living in their own communities in order to stay socially connected and in turn maintain wellbeing.

- The Proposed Development is fully consistent with the principles of the Government Policy Statement. It is ideally situated to provide housing for older people being centrally located within an *existing* community close to local shops, community facilities and public transport.
- The Proposed Development which is centrally located in Rathcoole town will facilitate aging in place, independent living and social integration.
- The Proposed Development accords with Universal Design principles – this is detailed further in Section 7.2 and the enclosed Architectural Design Statement.

5.1.7 Age Friendly Principles and Guidelines for the Planning Authority

Age Friendly Principles and Guidelines for the Planning Authority was prepared by Age Friendly Ireland and published in 2021 containing guidance to assist planning authorities when reviewing the development plan. The guidelines are produced in the context of Part V of the Act which requires planning authorities to prepare a Housing Strategy as part of the statutory development plan. Section 94(3)(c) of the Act requires that in preparing its Housing Strategy, the planning authority shall:

“(c) ensure[s] that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households.... including the special requirements of elderly persons and persons with disabilities,”

All local authorities in Ireland have adopted Age Friendly strategies which, in turn, are largely embedded into their recently adopted local authority corporate plans. The Guidelines set out how the objectives of the planning authorities Age Friendly Strategy should be reflected in their statutory development plan. The Guidelines contain specific objectives under common development plan themes. Those objectives relevant to the Proposed Development are summarised below:

- Population Change and Trends: Forward age profiling is critical to inform the sustainable development of the area. Therefore, the development plan must identify ageing population (55+) trends/cohorts at County/City-level which should also be broken down by municipal districts, towns and rural areas.
- Implementation of age friendly policies: the development plan should identify locations and design standards for nursing homes/ step down facilities/independent living units in line with national policy and guidance. Development control policies should require a minimum of 1.5 bedrooms for each older person housing unit.
- Application of Universal Design Standards to housing: to apply the Universal Design Standards to all residential development proposals over time.
- Refurbishment and Replacement Dwellings: Councils should facilitate the refurbishment or replacement of existing social housing stock within settlements to provide for age friendly use.
- Healthcare: accessible healthcare facilities (including nursing homes and health centres) should be provided near to centres of population growth.
- Recreational Facilities & Tourism: the Council should ensure that the development of all public spaces is designed to meets the needs of older people informed by 'walkability audits'.

- The Proposed Development is an example of how the principles outlined above can be delivered on the ground.
- The Proposed Development provides the opportunity for members of the *existing* community to down-size while maintaining existing social ties and provides *all residents* with the opportunity to become part of a new community.
- The Proposed Development accords with Universal Design principles – this is detailed further in Section 7.2 and the enclosed Architectural Design Statement.

5.1.8 Housing for Older People - Thinking Ahead

The *Housing for Older People - Thinking Ahead* research paper, published in 2016, was jointly commissioned by the Housing Agency and Ireland Smart Ageing Exchange (ISAX) to review the housing needs of an ageing population which has received insufficient attention to date.

The paper defines a spectrum of care which comprises of eight stages of housing/care needs which vary from 1 which is the least cost intensive up to 8 which the most cost intensive. The research focused on independent living with care models (stage 3-6). The research found that independent living with care needs (stages 3-6) are not well catered for in Ireland. The paper recommends that substantial investment in new age-appropriate homes is required to enable people to age in their own communities with appropriate levels of care and to prevent unnecessary transitions to acute care facilities.

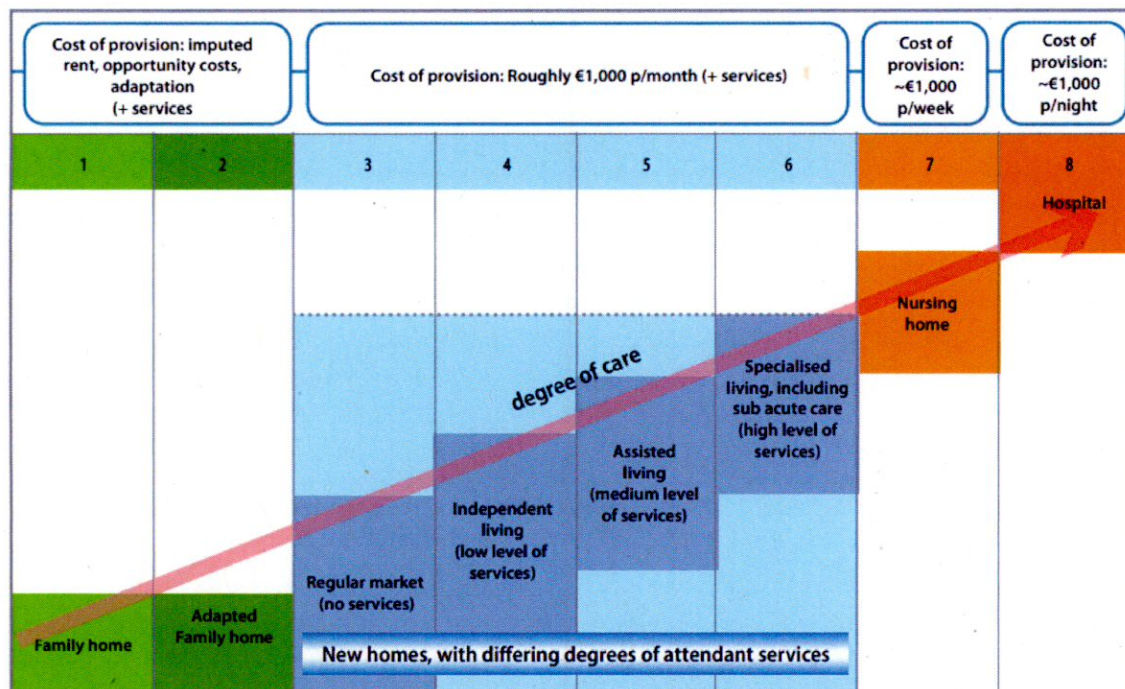


Figure 5.1. Spectrum of Care. Source: Figure 1.1 A new taxonomy of the housing and care needs of Ireland's older persons, *Housing for Older People - Thinking Ahead*, p15

The key findings emerging from the research are summarised here:

- Ageing in place: the concept of ageing in place involves more than just ageing at home. Options to 'downsize' must be provided within existing neighbourhoods to enable people to maintain social connections and access to services and facilities. This is critical because only a small fraction of homes are 'future-proof' - less than 30% of homes surveyed have widened doorways.
- Housing choice: housing and care choices for older people are limited. As the population of older people increases there is a risk that this will create blockages in the stock of existing housing if this is not addressed.
- Housing choice: Ireland caters for the first two stages (family home) and the last two stages (nursing home and hospital) of the housing and care needs spectrum. However, the four stages in the middle (independent living with care) are generally not well catered for.
- Nursing homes: the current model of nursing home provision which relies on a substantial fraction of older persons having housing equity is becoming increasingly unsustainable in the face of declining homeownership rates amongst the working age population.
- Housing needs: there is a large and growing gap between the types of accommodation/caring arrangements currently available and the needs of the ageing population. Based on conservative demand and construction cost assumptions it is estimated that there is an unmet need for c. 100,000 dwellings to meet the existing needs of older people (as of 2016), an investment cost of approximately €25bn (excluding land

costs). This does not take into account the significant population growth forecast in the 65+ age cohort.

- The Proposed Development is urgently required to address the significant shortfall of purpose built age-friendly housing in Ireland.
- The Proposed Development is classified as a stage 3 development – purpose built elderly needs accommodation without on-site care.
- The Proposed Development will help to prevent unnecessary transitions to acute care facilities (nursing homes) and therefore free up capacity for those most in need of acute care services.

5.2 Regional Planning Policy

5.2.1 Eastern Midlands Regional Assembly; Regional Spatial Economic Strategy

The Regional Spatial and Economic Strategy (RSES) (2019-2031) for the Eastern Midlands region was adopted in 2020 and provides a high-level development framework for the region that supports the implementation of the NPF. It identifies Regional Strategic Outcomes which align with the National Strategic Outcomes.

The RSES acknowledges that affordability of housing is one of the main challenges facing the Region, noting that *“continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the Region”* (p 17). The Regional Strategic Outcomes which apply to the Proposed Development include the following:

- *“2. Compact Growth and Urban Regeneration - Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens. (NSO 1)*
- *6. Integrated Transport and Land Use - Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)”*

The RSES identifies that the over 65 age cohort is projected to increase most significantly over the lifetime of the RSES and growth rates of the over 85 age cohort are expected to almost double. Accordingly, the RSES highlights *“an urgent need for responsive planning policy to avoid an ageing population crisis”* (p 200). Consistent with the NPF, the RSES recognises that the factors which contribute to a good quality of life for older people are community-based care, and that creating an age-friendly society requires high quality elderly accommodation to be available in the community.

- The Proposed Development will deliver on the following RSES Regional Strategic Outcomes - compact growth, urban regeneration and best use of existing transport infrastructure.
- The Proposed Development is entirely consistent with regional policy which support the regeneration of towns and delivery of housing by making better use of under-used land.
- Best use of existing transport infrastructure – the Site is well situated to facilitate a high proportion of trips via sustainable and active modes of travel being in an existing town centre and well served by the public transport network.
- The Proposed Development contributes to the achievement of the RSES objective to provide at least 50% of all new homes in Dublin within the existing built-up footprint.
- The Proposed Development will help to create an age-friendly society in accordance with the aims of the RSES by providing new high quality elderly care facilities *within* an existing community.

5.3 Local Planning Policy

5.3.1 South Dublin County Development Plan 2022-2028

The Site is wholly within the jurisdiction of South Dublin County Council. The Development Plan covers the plan period 2022 – 2028 which was made on 22 June 2022 and came into effect on 03 August 2022 ((the 'Development Plan').

Chapter 2 contains the core strategy for the County which sets out evidence-based population and housing targets for all settlements. The population of South Dublin is forecast to increase from 278,767 in 2016 to 323,769 by the end of the plan period in 2028 (+16.7%) which reflects the RSES high population target. This translates to an additional total housing target of 15,576 (or 2,613 per annum) for the County up to 2028 taking account of existing commitments.

Chapter 2 sets out the settlement strategy for the County. Rathcoole is defined in the settlement hierarchy as a 'self-sustaining growth town'. Rathcoole is categorised as a medium sized town which is set to experience significant population growth over the plan period. The Development Plan states Rathcoole had a population in 2016 of 4,351 which is targeted to grow by 1,339 persons (31%) to 5,690 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 this equates to an overall growth of 2,093 (48%) persons over the period 2017 to 2028. The housing delivery target for Rathcoole is 487 new homes over the plan period which equates to 3% of total housing growth in the County. Policies and objectives from Section 2.7.2 applying to Rathcoole are set out below:

- *"Policy CS10: Rathcoole: Support the sustainable long-term growth of Rathcoole by focusing development growth along the main street based on local demand and the ability of local services to cater for sustainable growth levels.*
- *CS10 Objective 2: To support well-designed infill development along the main street and core village area of Rathcoole.*
- *CS10 Objective 3: To proactively support and promote the highest levels of services, social infrastructure, facilities, retail and economic activity to meet the needs of current and future growth in line with the scale and function of Rathcoole within the settlement hierarchy.*
- *CS10 Objective 4: To facilitate the delivery of new residential development in a coordinated manner, ensuring alignment with investment infrastructure and supporting amenities and*

services. Such measures shall be delivered through appropriate phasing in line with CS10 SLO1 and SLO2.

In Chapter 6 the Development Plan recognises the need to provide purpose-built elderly housing schemes to meet the housing needs of the County's ageing population. It states that the projected growth in the 65+ group forms the largest change up to 2031 with a projected increase of 56.4% or 17,447 persons. This is a continuation of the trend from previous years where the cohort increased by 33% between 2011 and 2016 which is an increased rate from the 29% between 2006 and 2011 Census. This represented a 73% growth of this age group over the 10-year period of 2006-2016.

The Development Plan aims to address the housing needs of older people within their communities by providing a range of attractive accommodation choices for people wishing to rightsize which in turn will help to address the underutilisation of larger houses. However, the ability to rightsize depends on both the availability and accessibility of housing options that people feel would improve their quality of life. This often involves moving to smaller housing units which require less maintenance.

Analysis undertaken by the Council shows that enabling older to people to right size within their communities could release a significant stock of family homes. The analysis showed that approximately 12% of Council housing tenancies are comprised solely of households of one or two persons, all aged 55 or older, living in three or four-bedroom homes. This represents approximately 700 Council homes with single occupancy by an older person and almost 500 additional homes occupied by two older persons (1,200 homes in total). The total number of underutilised larger homes across the County will be far greater however the Development Plan does not estimate the number of private homes which are underutilised.

The shortage of purpose-built age-friendly homes in the County presents a barrier to addressing the current underutilisation of larger family homes. New age-friendly developments such as the Proposed Development are urgently required to address the undersupply of suitable accommodation choices for older people. The following policies and objectives specifically support the development of age-friendly schemes such as the Proposed Development:

- *Policy H1 Objective 3: "To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs."*
- *Policy H3: Housing for All Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.*
- *H3 Objective 5: To actively encourage and directly support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing and adaptation of existing properties as a matter of urgency.*
- *H3 Objective 6: To promote 'aging in place' and opportunities for right sizing within communities and require an evidence base for proposed new nursing homes in areas which appear to be well served by them.*

The Site is zoned as 'Existing Residential' (RES) land use with the primary objective being 'to protect and/or improve residential amenity'. Under this zoning Housing for Older People, Nursing Homes and Retirement homes are 'Permitted in Principle' and Community Centres are 'Open for Consideration'. Lands immediately to the southeast of the Site are zoned as 'Village Centre' (VC).

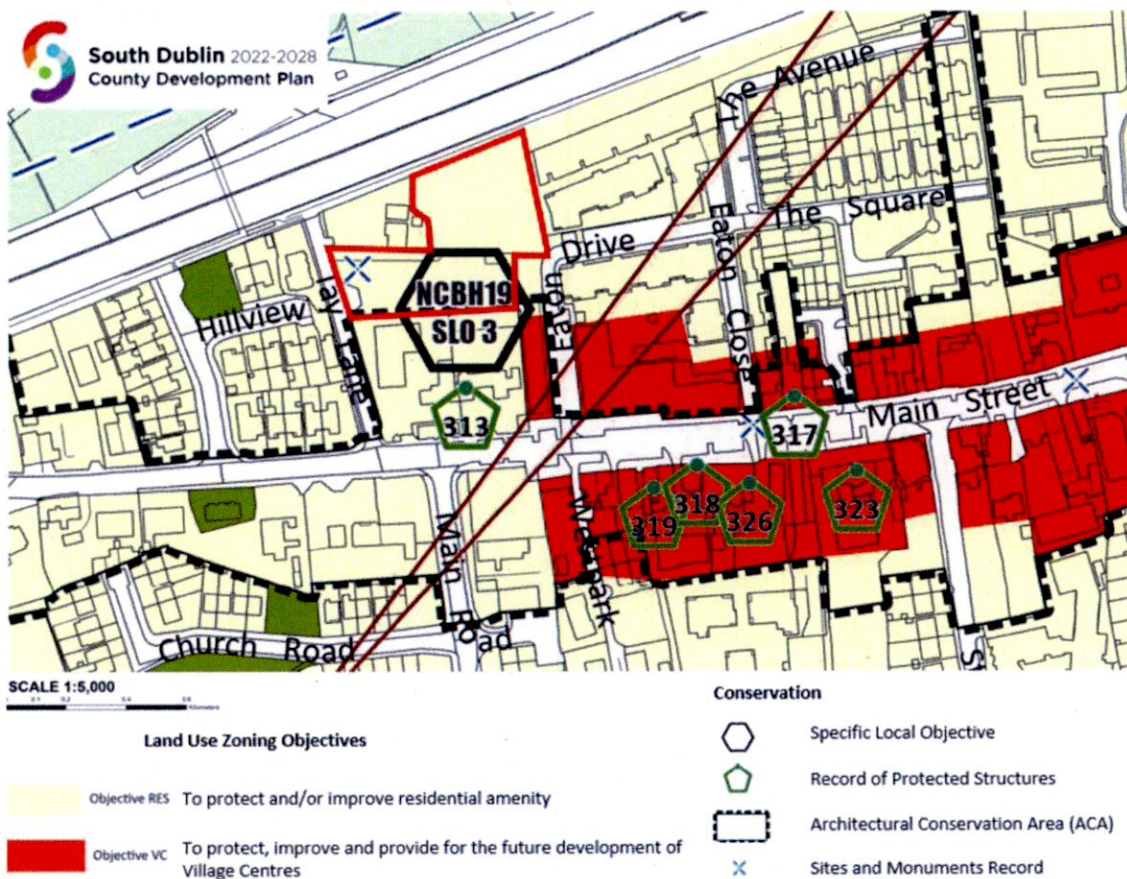


Figure 5.2 Zoning for subject site in SDCC Development Plan 2022-2028 with the Indicative Boundary of the Subject Site Outlined in Red

As detailed in Figure 5.2 and Table 5.2 the Site's southern boundary adjoins the boundary of the Rathcoole Town Architectural Conservation Area ('ACA') which contains several Protected Structures. The nearest Protected Structure – Glebe House - is located on the land parcel immediately to the South of the Site. This application is supported by an Architectural Design Statement which sets out an Architectural Impact Assessment and Design Rationale for the Proposed Development having regard to the adjacent Rathcoole Town ACA and surrounding Protected Structures. This is detailed further in Section 8.2 of this Report.

Table: 5.1 Protected Structures in the vicinity of the Site

RPS Ref.	Address/Location	Description
313	Rectory/Glebe House, Main Street, Rathcoole	House
317	Main Street, Rathcoole	Terraced Three Bay Two Storey with Commercial Units to Ground Floor
318	Hillview, Main Street, Rathcoole	Semi Detached Three Bay Two Storey House
319	Library Building, Rathcoole	Court Of Petty Sessions
323	Main Street, Rathcoole	Detached Five Bay Two Storey House
326	The Rathcoole Inn, Main Street, Rathcoole	Two Storey Thatched Public House

Historic records indicate that a buried Recorded Monument - St. Brigid's Well (no. DU021-030004) – is located in the northwestern corner of the Site. In total there are five no. Recorded Monuments in the vicinity of the Site as detailed in Table 5.2. This application is supported by an Archaeologist Desktop

Study prepared in accordance with the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999). This is detailed further in Section 7.7 of this Report.

Table: 5.2 Record of Monuments and Places in the vicinity of the Site

RMP No.	Address/Location	Description	Distance From Site
DU021-030004	Rathcoole Holy Well	Holy Well	Within development extent
DU021-030007	Rathcoole	16/17th century house	150m west of site
DU021-030008	Rathcoole	Settlement cluster	Unknown location in Rathcoole townland
DU021-030001	Rathcoole	Church	500m east of site
DU021-030001	Rathcoole	Graveyard	500m east of site

Further Development Plan policies and objectives applying to the Site and the Proposed Development are summarised in **Appendix 1 Table 1.1**.

- The Site's 'Residential' (RES) land use zoning under the Development Plan facilitates the Proposed Development - Housing for Older People is 'Permitted in Principle' and community centre is 'Open for Consideration'.
- The Proposed Development addresses the urgent need acknowledged by the Council to meet the existing and growing demand for purpose-built age-friendly housing in all communities throughout the County.
- The Proposed Development provides residents with the opportunity to 'right-size' to a home which better meets their housing needs which can help to unlock the supply of much-needed family housing in the County.

6.0 Proposed Development

This section provides an overview of the key characteristics of the Proposed Development. This section should be reviewed alongside the enclosed Architectural Drawings and Architectural Design Statement which provide further detail.

The proposed development will principally consist of the construction of a four-storey apartment block consisting of 58no. age-friendly residential apartments comprising 20 no. 1-bedroom units and 38no. 2-bedroom units. The proposed development also includes the provision of an ancillary community facility, associated accommodation including refuse stores and cycle stores, car and cycle parking, landscaped communal and public open space and boundary treatment works. Planning permission is also sought for internal access roads and pedestrian / cycle pathways and linkages, public lighting, landscaping, and all associated site and development works to facilitate the proposed development. The development is sought to be delivered in conjunction with AHB Clúid Housing and they have been consulted throughout the design process to ensure that the scheme conforms to their operational and quality standards. Table 6.1 sets out key development statistics.

Table 6.1 Key Development Statistics

KEY DEVELOPMENT STATISTICS	
Site Area	Gross Site Area 0.473 ha
Gross Floor Area (Residential)	3634.9 sq.m
Density	123 Unit/Ha
Plot Ratio	0.93
Site Coverage	30%
Height	Maximum height: 13.1m (4-storeys)
Total No. of units	58 units
OPEN SPACE	
Public Open Space	907.4 sq.m (19%)
Communal Amenity Open Space	1225.6 sq.m
NON-RESIDENTIAL	
Community Centre	86.2 sq.m
Plant Room	40.6 sq.m
Bin Store	25.8 sq.m
Bike Storage	36.0 sq.m
Switch Room	15.0 sq.m
Sub-Station	14.0 sq.m
RESIDENTIAL	
Apartments	1 Bed - 20 units 2 Bed - 38 units Total 58 units
Dual aspect apartments	70%
Part V	12 no. units
PARKING	
Car Parking Provision	30 no. total 3 no. Visitor
Bicycle Parking	56 no. long-stay 24 no. short-stay 80 no. total



Figure 6.1 Site Layout Plan of the proposed scheme

6.1 Need for Proposed Development

The need for additional age-friendly housing units tailored for the elderly is well-established at the National and local level. Planning policy at all levels recognises the need to increase the supply of age-friendly housing to meet the increasing demand in the context of demographic change. As noted in Section 5, the CSO data indicates that the elderly population will double in all regions of Ireland between 2006-2026. In South Dublin specifically, the Plan indicates that the 65+ age group will increase by 56.4% (17,447 persons) by 2031.

The Development Plan supports the delivery of housing tailored for the elderly. It is therefore considered that the proposed scheme is fully consistent with the plan and will provide much needed housing for an increasing age cohort.

6.1.1 An Ageing Population

The 2016 census showed that there was an increase in the number of older people in Ireland compared to the 2011 census. Figures from the 2016 census showed that South Dublin County had 11.1% of its total population in the age cohort 65 and above. While Rathcoole ED recorded 15.2% of its population to be over the age of 65. The state had a higher percentage in 2016 with 13.4% aged over 65 years old.

Consideration of future anticipated population has been achieved by referring to the Central Statistics Office's published projections for State-level¹ and an applied use of internationally recognised best

¹ CSO M2F2 Dublin Outflow - <https://www.cso.ie/en/releasesandpublications/ep/p-rpp/regionalpopulationprojections2017-2036/>

practice² to establish the likely trajectory of same at South Dublin County Council level (as no official projections are produced below regional level).

For the purposes of this research, we have considered alignment with the CSO's M2 migration assumption when designing a scenario for South Dublin. It aligns from 2026 (in order to first account for assumed near-term COVID-19 related drop-offs in migration). A projection scenario called 'M2aCF2 M21' was developed in this regard.

Table 6.2 illustrates that by 2026 South Dublin is anticipated to have nearly 15% of its total population comprised of those aged 65 and above; correspondingly the state will have almost 17% of its total population aged 65 and above.

Table 6.3 shows that in South Dublin, in the 10-year period from 2016 to 2026, an anticipated 14,349 additional people will be aged 65 and above. By 2031, it is anticipated to have increased by 21,114 people over 2016. This is a 46.4% and 68.3% increase on 2016 respectively.

Table 6.2: Percentage of total population aged 65 +

Year	2011	2016	p2021	p2026	p2031
SDCC 65+ as % of total (KPMG 2021+)	7.8%	10.5%	12.9%	14.7%	16.3%
State 65+ as % of total (CSO)	11.7%	13.4%	14.9%	16.7%	18.5%

Table 6.3: Number of people aged 65+

Year	2011	2016	p2021	p2026	p2031
SDCC population aged 65+ (KPMG 2021+)	23,053	30,925	38,089	45,274	52,039
State population aged 65+ (CSO)	535,393	637,567	743,089	867,118	999,654

This highlights the underlying need to provide adequate social infrastructure for the ageing population within South Dublin. Projections for the State predict an additional 229,551 people aged 65 and above by 2026, or 362,087 by 2031 (a 36% and 56.8% increase on 2016 respectively).

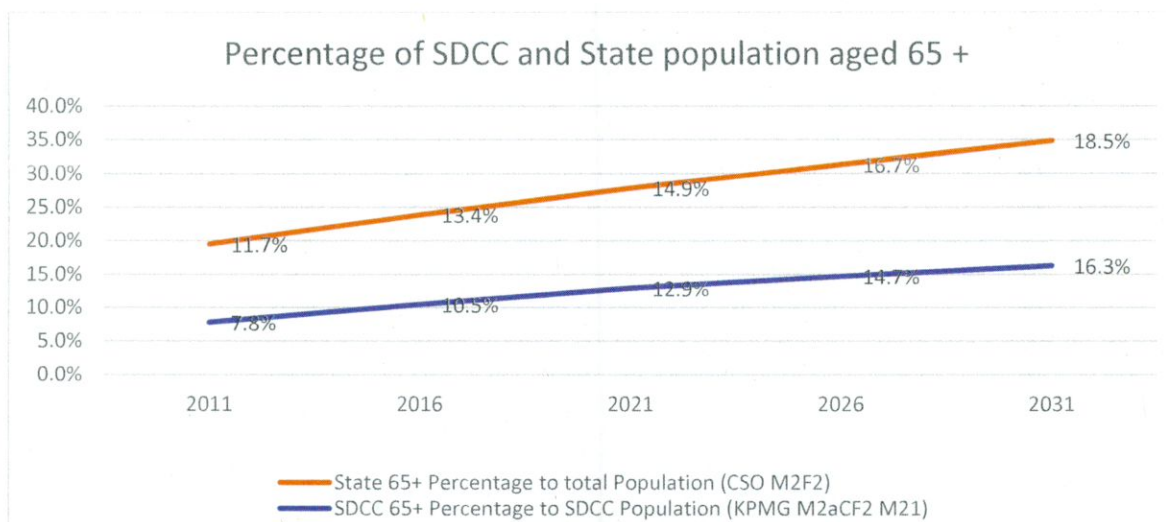


Figure 6.2: Projected percentage aged 65+ in South Dublin County Council (SDCC) and State population

² The application of the Cohort Component Method or CCM has been used to develop a forward-facing scenario on population growth. CCM is used by the Central Statistics Offices (CSO) and statistical agencies world-wide to determine population growth using data-led assumptions in mortality, fertility and migration. In this instance, an account of recent trends in migration and estimates from the CSO have been used to underpin a scenario called 'M2aCF2 M21' developed in March 2021 by KPMG Future Analytics. This scenario accounts for a near-term reduction in net inward migration, with a gradual return to the CSO M2 assumption by 2026. Further information is available upon request.

6.1.2 Existing Provision of Elderly Care

Figure 6.3 shows the location of registered elderly care facilities in the study area. Table 6.4 identifies the capacity of Nursing Homes according to the latest HIQA inspection reports available at 18 of August 2022. In total there are three nursing homes in the 5km Study area however there is only one nursing home in the town of Rathcoole with a capacity of four places.

The NPF aims to enable older people to live independently in their own communities by providing a choice of suitable accommodation for the elderly in all settlements. Our assessment shows there is extremely limited capacity for nursing homes to accommodate the growing aging population of Rathcoole which is projected to increase by 1,339 persons between 2016 – 2028 (31%). Further, as noted above, the 65+ age cohort is the fastest growing age cohort over the long-term to 2031.

As evidenced in Table 3-3 in **Section 3** of this report there is currently no additional nursing home spaces in the planning pipeline in Rathcoole and relatively little provision for new nursing home spaces in neighbouring settlements, despite significant population growth forecast in South Dublin and demographic trends indicating the need for more accommodation for the elderly.

The Proposed Development, if constructed, would provide much needed age-friendly housing in an area which currently has a noticeable shortfall of accommodation and would help to free up capacity for those most in need of nursing home spaces. The lack of care facilities for the elderly in the planning pipeline means that capacity issues for more acute care services will be exacerbated if proposals similar to this scheme are not brought forward in the near future.

Table 6.4: Capacity of Existing Nursing Homes in Study Area (5km)

Existing Nursing Home Name & Address	Maximum Occupancy	No. residents on last inspection	Capacity
Lisheen Nursing Home, Stoney Lane, Rathcoole, Co. Dublin, D24 Y042	118	114	4
Millbrook Manor Nursing Home, Castle Rd, 24, Coolmine, Saggart, Co. Dublin	63	56	7
TLC City West, Cooldown Commons, Fortunestown Lane, Citywest, Dublin 24	139	113	26

7.0 Planning Assessment

This Section addresses the principal planning considerations applying to the Proposed Development, having regard to national and regional policies and the Development Plan (2022-2028). This Section is supported by **Table 1.1 in Appendix 1**.

7.1 Principle of Development

The principle of development is supported by planning policy at all levels. The Proposed Development will secure the regeneration of a vacant brownfield site and deliver urgently needed age-friendly housing close to existing amenities and public transport within a town centre context. The NPF and the Development Plan encourages the development of age-friendly housing catering to the evolving housing and care needs of the growing elderly population.

The Proposed Development will contribute to the achievement of the following National and regional policy objectives (detailed in Section 5 of this report):

- Compact Growth - supports the core National and regional policy objective of accommodating projected household growth while avoiding urban sprawl by delivering sustainable compact growth and increasing residential densities (NSO 1, National Policy Objective 53, RSO 2).
- Supports the National and regional objective to provide at least 50% of all new homes in Dublin within the existing built-up footprint by achieving increased residential densities (National Policy Objective 3b).
- Increased residential densities will be achieved through the sensitive redevelopment of a vacant brownfield site and increased building height in an appropriate town centre location (National Policy Objective 35).
- In line with National and regional policy objectives and the Urban Development and Building Heights Guidelines, the Proposed Development is appropriately sited to accommodate increased residential densities and building heights being within a town centre and well-served by public transport (National Policy Objective 13).
- Urban Regeneration – delivers on the core regional policy objective of securing regeneration of towns and delivery of housing by making better use of under-used land (RSO 2).
- Best use of existing transport infrastructure – the Site is well situated to facilitate a high proportion of trips via sustainable and active modes of travel being in an existing town centre and well served by the public transport network (RSO 6).
- Age Friendly Society - the Proposed Development supports the National and Regional core policy objective of enabling older people to live independently within their communities for as long as possible (NPF p86, National Policy Objective 30, RSES p200).
- Aging in Place - in line with National and regional policy principles, the Proposed Development is ideally situated to provide age-friendly accommodation - it is within a growing town close to local shops, community facilities and public transport (NPF p86, National Policy Objective 30, RSES p200).

The Proposed Development is supported in principle by the Development Plan. The Site's 'Residential' (RES) land use zoning under the Development Plan facilitates the Proposed Development; Housing for Older People is 'Permitted in Principle' and community centre is 'Open for Consideration'. The proposal

is in line with Section 12.6.6 of the Development Plan which requires retirement villages (i.e., independent housing units with limited or no on-site care facilities) to locate on residential zoned land in settlements.

The Proposed Development addresses the urgent need acknowledged by the Council in the Development Plan to meet the existing and growing demand for purpose-built age-friendly housing in all communities throughout the County (Policy H3, H3 Objective 5). The Proposed Development supports aging in place in accordance with aim of the Development Plan (H3 Objective 6); it provides residents with the opportunity to 'right-size' to a home which better meets their housing and care needs which can help to unlock the supply of much-needed family housing in the County.

The Proposed Development is ideally situated to provide age-friendly accommodation as envisaged in the Development Plan (Policy H3) which supports the development of purpose-designed housing for older people in residential and mixed-use areas, proximate to existing services and amenities including shops, parks and public transport.

7.2 Design and Layout

The Proposal is the result of an iterative design process which has been enhanced by consultation involving the South Dublin County Council, Irish Water and Clúid Housing. The design and layout of the Proposed Development has been informed by a careful consideration of surrounding land uses, especially sensitive uses and the character and scale of surrounding properties, especially the adjacent Glebe House Protected Structure. The Proposed Development has been designed to integrate with the existing context in terms of scale, form and materiality. This application is supported by an Architectural Design Statement prepared in accordance with the requirements of the Development Plan and the South Dublin Building Height and Density Guide which details the design rationale.

7.2.1 Housing Quality Assessment

This section should be read alongside the Housing Quality Assessment submitted as part of this application (refer to Appendix 1 of the Architectural Design Statement) in accordance with the National Apartment Guidelines, which provides a consistent set of national standards for apartment design. The headline findings of the assessment are summarised below:

- Minimum floor area: all units meet or exceed the relevant National standard.
- Proportion of dual aspect units: the scheme exceeds the relevant National standard (at 33%). 70% of units will be dual aspect.
- Private amenity space: all units meet or exceed the relevant National standard. Each apartment is provided with a private balcony/terrace.
- Storage area requirement: 59% of units meet or exceed the relevant National standard.
- Bedroom floor area: all units meet or exceed the relevant National standards.
- Living/dining/kitchen area: all units meet or exceed the relevant National standards.

7.2.2 Density

The Development Plan does not prescribe maximum density standards. Under the 'Plan Approach', the Development Plan promotes increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure (QDP2 Objective 1). QDP7 Objective 1 states the Council will promote high quality design through the implementation of the South Dublin Building Height and Density Guide which outlines a criteria-based assessment for proposals based on the 12 criteria contained within the 'Urban Design Manual - A Best Practice Guide (2009)' (summarised in Section 5 of this report).

The Architectural Design Statement provides a contextual assessment of the Site in accordance with the South Dublin Building Height and Density Guide which demonstrates that the density of the Proposed Development is in keeping with the urban structure and grain of its surroundings (refer to Section 5.3 and 6.0). As noted above, the amount of public open space and communal amenity space exceeds the Development Plan minimum standards, and a variety of outdoor spaces are provided for active and passive recreation as detailed in Section 7.3 of this report.

The density of the Proposed Development is acceptable in view of precedent schemes permitted by the Council with higher densities. The permitted Eaton Green apartment development has a density of 303 units per hectare (Pl. Reg. Ref. SD17A/0036, SD06A/0734, SD07A/009). The permitted scheme on Glebe House site has a density of c.140 units per hectare when excluding the retail units (Pl. Reg. Ref. SD03A/0238).

7.2.3 Height

The Urban Development and Building Heights – Guidelines for Planning Authorities (2018) sets out the Government’s presumption in favour of increased building heights in urban locations with good public transport accessibility (p13) subject to compliance with development management criteria detailed under Section 3.2. Accordingly, the subject Site is generally considered to be suitable to accommodate increased building heights being in a town centre location with good access to public transport services.

The Proposed Development is assessed in detail against the SPPR 3 development management criteria in Table 7.1.

Table 7.1 Urban Development and Building Heights Guidelines - SPPR 3 Development Management Assessment

Development Management Criteria	Demonstration Of Compliance
At The Scale of The Relevant City/Town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The Site is directly served by the regional public transport network with frequent bus services to Dublin City Centre and surrounding settlements (every 20 minutes).
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. ³ Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The Proposed Development has been designed to integrate with the existing context in terms of scale, form and materiality as detailed in the enclosed Architectural Design Statement (refer to Section 5.0 & 5.5) and Townscape and Visual Impact Assessment. The design and layout of the Proposed Development has been informed by a careful consideration of surrounding land uses, especially sensitive uses and the character and scale of surrounding properties, especially the adjacent Glebe House Protected Structure.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	The Proposed Development will deliver a significant improvement to the public realm in terms of design and connectivity. The proposal will secure the redevelopment of a derelict, disused town centre site with high-quality purpose-built age-friendly housing units set within a highly landscaped setting. The Proposed Development will also improve connectivity and legibility within the town centre by providing a

Development Management Criteria	Demonstration Of Compliance
	new pedestrian footpath between Eaton Drive to the east and Tay Lane to the west.
At The Scale of District/ Neighbourhood / Street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	The Proposed Development which incorporates a four-storey element and a single storey element is in keeping with the prevailing height of the locality which varies significantly between 1.5 storeys up to 4-storeys. The adjacent residential development to the east at Eaton Close is 4 storeys in height with a further mix of one to two storeys. The site to the south behind the Glebe House has been granted permission for a mix of two and three storey buildings. The Proposed Development aims to maintain the height of Eaton Close in a new apartment block running North / South along the eastern edge of the site. This mitigates the impact on the neighbouring Tuath Housing property to the west of the development site, maximising the distance from the existing building. The horizontal banding extenuates the linearity of the building making it appear lower.
The proposal avoids long, uninterrupted walls of building in the form of perimeter blocks or slab blocks with materials / building fabric well considered.	The building provides a variety of angles and recesses through careful design of the façade to avoid long uninterrupted walls. The proposed mix of render and brickwork is designed within horizontal banding to remove the need for numerous movement joints while integrating into a well-considered facade. Refer to Section '4.4 Typical Apartment Bay' and Section '7.0 Proposed 3D Imagery' of the Architectural Design Statement for further details.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).	The Proposed Development will deliver a significant improvement to the public realm in terms of design and connectivity. The proposal will secure the redevelopment of a derelict, disused town centre site with high-quality purpose-built age-friendly housing units set within a highly landscaped setting. The Proposed Development will also improve connectivity and legibility within the town centre by providing a new pedestrian footpath between Eaton Drive to the east and Tay Lane to the west.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The Proposed Development will improve connectivity and legibility within the town centre by providing a new pedestrian footpath between Eaton Drive to the east and Tay Lane to the west.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The Proposed Development will provide urgently needed purpose-designed age-friendly housing. It will enhance the mix of dwelling types in the town centre and improve housing choice in the County.
At The Scale of The Site/ Building	

Development Management Criteria	Demonstration Of Compliance
<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light</p>	<p>The proposed apartment block is orientated in a north-south direction located on the eastern side of the Site (adjacent to Eaton Drive) and all apartments have an east or west outlook. The proposed site layout has the following benefits:</p> <ul style="list-style-type: none"> • The narrowest side of the building faces on to Glebe House which minimises views of the Proposed Development in the background of Glebe House and the number of apartments 'over-looking' Glebe House. • East / west orientation of apartments maximises solar gain while reducing the need for mechanical heating. • Achieves minimum residential separation distances and exceeds the required setbacks from the N7 carriageway. <p>Detailed justification for the proposed final site layout is provided in the Architectural Design Statement (refer to Section 2.4 and 3.0) and detailed in Section 7.2 Section 7 of this report</p> <p>The enclosed Daylight/Shadowing Assessment demonstrates that the Proposed Development will provide appropriate standards of daylight and sunlight for all habitable rooms and 93% of units will exceed the minimum suggested levels for Average Daylight Factors.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.</p>	<p>The enclosed Daylight/Shadowing Assessment demonstrates that the Proposed Development will provide appropriate standards of daylight and sunlight for all habitable rooms and 93% of units will exceed the minimum suggested levels for Average Daylight Factors.</p>
<p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	<p>As noted above, 93% of units will exceed the minimum suggested levels for Average Daylight Factors as detailed in 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guideline to Good Practice (BRE 2011) ('the BRE Guide') and BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. However, it is noted that specific apartments are marginal in terms of achieving the target daylight factor - notably for 4 of the bedrooms with private set back terraces - although these are all within 10% of the recommendations.</p> <p>The BRE Guide notes that the guide itself <i>'is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location.'</i> It recognises that <i>'Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many</i></p>

Development Management Criteria	Demonstration Of Compliance
	<p><i>factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.'</i> Therefore, if the situation arises where the targets identified within the Guide are not achieved, these should be highlighted and either justified in the context of the development / site or where relevant and applicable, compensatory measure will be proposed.</p> <p>In the context of the Proposed Development, it should be noted that daylight and sunlight to the proposed apartments has already been maximised through building orientation and increased window openings.</p> <p>The four no. bedrooms which do not meet the suggested Average Daylight Factors levels all contain private set back terraces which although they impact the quantum of daylight to the interior of bedrooms they also provide a positive contribution to the overall quality of life within the development. These four no. units do all however provide at least 2 hours (and in most cases 3 hours) of exposure to sunlight on the Spring Equinox as defined by IS EN 17037:2018 Daylight in Buildings. As such we are satisfied that the proposed development will provide appropriate standards of daylight and sunlight access for all habitable rooms.</p>

In line with the Urban Development and Building Heights Guidelines, the Development Plan does not prescribe maximum height standards. Rather under the Plan Approach, the Development Plan promotes increases in building heights in the right locations maximising transport network and infrastructure (QDP2 Objective 1). QDP7 Objective 1 states the Council will promote high quality design through the implementation of the South Dublin Building Height and Density Guide which outlines a criteria-based assessment for proposals based on the 12 criteria contained within the 'Urban Design Manual - A Best Practice Guide (2009)' which are summarised in Section 5 of this report.

The Architectural Design Statement provides a contextual visual assessment of the Site in accordance with the South Dublin Building Height and Density Guide which demonstrates that the height of the Proposed Development is in keeping with the character of surrounding sites and will not result in loss of amenity for neighbouring sites due to the careful design of the scheme (refer to Sections 5.0, 5.3 and 7.0). The proposed four storey apartment block is orientated along a north to south bar on the eastern side of the Site in order to mitigate impacts on the neighbouring two-storey Tuath Housing property to the northwest and the Glebe House Protected Structure to the south. The proposed community facility / store building proposed along the Tuath Housing property boundary is limited to a single storey to avoid any adverse impacts on the neighbouring property. The overshadowing analysis demonstrates that the impact on the neighbouring properties is minimal due to the proposed layout and orientation of the apartment block (refer to Section 5.3).



Figure 7.1. 3D image of the Proposed Development showing Eaton Drive to the east, the approved Glebe House redevelopment (Pl. Reg. Ref. SD03A/0238) to the south and the N7 to the north

The proposed apartment block maintains the height of the adjacent Eaton Close apartment building to the east. The parapet height of the proposed 4-storey apartment block, at 13.1m, is c. 1.5m taller than the adjacent 4-storey apartment blocks on Eaton Drive. The reason for this increased height is entirely justified, the Proposed Development is slightly taller due to the raised ground level and to allow for more generous ceiling heights in accordance with the National Apartment Guidelines (2.7 m at the ground floor and 2.6 m above ground floor) compared to the Eaton development (at 2.45 m) (Pl. Reg. Ref. SD17A/0036, SD06A/0734, SD07A/009).

Based on the consideration of the criteria contained in the South Dublin Building Height and Density Guide and the assessment against the Urban Development and Building Height Guidelines contained at **Table 7.1** it is submitted that the proposed building height is justified taking account of its sustainable location, surrounding building heights and the site layout which will see the proposed apartment block set within a generous area of high-quality landscaped open space.

7.2.4 Single / Dual Aspect

The Development Plan (section 11.3.1 vi) requires apartment schemes to achieve the dual aspect ratios set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018). The Site is within the built-up footprint of Rathcoole town centre, and it could therefore be considered as intermediate location under the National Apartment Guidelines. The Guidelines require at least 33% of units to be dual aspect in intermediate locations. The Proposed Development exceeds the minimum dual aspect ratio contained in the Guidelines substantially – 70% of the proposed units are dual aspect.

7.2.5 Setback

The Development Plan generally requires a minimum separation distance of 22m between directly opposing above ground floor windows as a general benchmark maintain privacy however reduced distances will be considered for higher density schemes or infill sites where innovative design solutions are used to maintain a high standard of privacy (Section 12.6.7).

As detailed, in Section 7.2.3 of this report, the proposed four-storey apartment block has been sited and orientated to maximise the separation distance from the neighbouring two-storey Tuath Housing property to the northwest. A separation distance of 22.6m between opposing windows has been achieved through the careful design of the site which exceeds the benchmark set in the Development Plan. The proposed community centre / storage building is single storey and all ground floor windows face into the Site. As such, it is submitted that the Proposed Development would not injure the privacy or amenities of the neighbouring Tuath Housing property or any other neighbouring properties.

The proposed site layout exceeds the required 20m setback from the N7 carriageway, at 20.5m. The Proposed Development also incorporates noise mitigation measures (detailed in Section 7.5 of this report) which will ensure the proposed apartments conform to internal residential noise standards as per best practice guidance.

7.2.6 Universal Design

In accordance with the Development Plan (Section 12.5.1), the development has been designed to accord with Universal design principles as detailed in the Architectural Design Statement (refer to Section 4.5). The proposed design has been developed in accordance with the Building Regulations 2010 Technical Guidance Document M (Access and Use). The proposed apartments layouts have been designed in line with Universal Design principles and the Clúid Design Handbook to be flexible and adaptable to suit changing lifestyles. The following specific Universal design measures have been incorporated into the scheme:

- Level access is provided throughout the whole development in accordance with Technical Guidance Document M.
- A lift will be provided in the apartment block providing step-free access to the upper floors and internal doors and corridor widths are sized to facilitate wheelchair access.
- All apartments, bedrooms, showers and balconies are entirely accessible by wheelchair.
- All apartment areas exceed current HIQA bedroom standards.
- In accordance with Technical Guidance Document M over 5% of the car parking spaces proposed are designated spaces (10% of total spaces) and designated disabled parking spaces are located next to building entrances to provide for efficient access.

Further, all bathrooms have been located adjacent to the primary bedroom on approximately 40% of the apartments to allow for direct access to be provided from the bedroom if necessary and a soft spot will be installed in the wall of all other apartments for easy adaptation.

7.3 Open Space and Landscaping

This Section presents an overview of the open spaces and Green Infrastructure incorporated to the scheme. The proposed open spaces are multifunctional in nature, providing complementary amenity, recreation, flood risk management and drainage, and ecological functions. This application is supported by a Landscape Design Rationale (Incl. Green Space Factor Worksheet), an Architectural Design Statement, Tree & Hedgerow Survey report and an Ecological Impact Assessment which provide further details of the proposed Green Infrastructure.

Balconies/terraces will be provided for each apartment to provide private amenity space for all residents. Balconies/terraces have been placed along the eastern and western façades of the apartment block to maximise solar gain. The scheme meets or exceeds the minimum Development Plan private amenity space requirement for each unit as detailed in the submitted Housing Quality Assessment. The Development Plan requirements are consistent with the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)'.

7.3.3 Ecology

The Development Plan aims to protect and promote biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected (Policy NCBH5).

In accordance with Development Plan NCBH5 Objective 2 an Ecological Impact Assessment has been carried out for the Proposed Development including bat roost and emergence surveys and recommends avoidance and mitigation measures.

The Ecological Impact Assessment finds that the Proposed Development has the potential to impact on local bird populations during construction as a result of loss of habitat (tree/shrub clearance), however given there are considerably more suitable nesting and foraging the Assessment concludes that the impact from the loss of this habitat is negligible. The removal of suitable nesting habitat during the breeding season has the potential to have a negative impact. To avoid this occurring standard practices can be applied during construction to ensure tree clearance is undertaken outside of nesting bird season wherever possible.

The Ecological Impact Assessment finds that the Proposed Development has the potential to impact on local bat populations during construction as a result of loss of habitat (tree/shrub clearance), however given the presence of existing light-spill within the site, and the availability of suitable, alternative habitat within the wider environment, the loss of this habitat is considered to be negligible. The Proposed Development will therefore not result in any significant negative effects on local bat populations in terms of impacts to wider landscape connectivity since the Site is not considered to perform an important landscape connectivity function for bat species being in a well-lit area next to a busy national road.

The Ecological Impact Assessment states there are no impacts on ecological receptors anticipated from the operational phase of the Proposed Development. The Assessment concludes that there will not be any significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the proposed development provided mitigation measures proposed are carried out in full.

7.3.4 Tree Survey and GSF

The site layout has been carefully considered to retain existing trees wherever possible in line with Development Plan NCBH11 Objective 3. The Proposed Development requires 42 no. trees to be removed in order to facilitate development of age-friendly housing on-site. 22 no. trees will be retained and protected along the norther boundary to provide a natural acoustic and visual buffer between the Site and the N7 to the north. The vast majority of trees identified for removal are Category C trees (refer to Tree Survey (sheet no. 22116/TS/01). Category C Trees are defined as 'trees of low quality / value with a minimum of 10 years life expectancy according to BS5837: 2012. 6 no. Category B trees are also identified for removal (moderate quality).

In accordance with Development Plan NCBH11 Objective 3, the landscaping strategy includes new high value tree and native hedgerow planting to compensate for the loss of existing trees. The trees

canopy calculation in the Landscape Design Rationale demonstrates that 19% of the Site will be covered by tree canopy when trees reach maturity (approximately 10 years) (refer to p9).

The Landscape Design Rationale contains a Green Space Factor scoring assessment which demonstrates that the Proposed Development will exceed the minimum GI score of 0.5 with a score of 0.57 (Development Plan GI5 Objective 4).

7.3.5 Surface Water Drainage

In accordance with the Development Plan (GI4 Objective 1) and the South Dublin County Council Sustainable Drainage Explanatory Design and Evaluation Guide (2022) a surface water drainage strategy has been prepared for the Proposed Development to limit surface water run-off through the use of Sustainable Drainage Systems (SuDS).

The proposed surface water drainage strategy includes a large soakaway which has been designed in accordance with the recommendations of BRE 365: Design of Soakaways (2016). The soakaway shall be constructed with proprietary modular units with a void ratio of 0.95 to enable the discharge of the surface water generated on the roof areas to the ground within the subject site area. The provision of the soakaway will ensure that no surface water will discharge to the public network. Details of the proposed soakaway are shown on drawing no. CORA-C001. Further detail is also provided in the enclosed Engineering Report (refer to p11-12).

7.4 Daylight and Shadow Assessments

In accordance with the Development Plan (Section 12.6.7) this application is supported by a Daylight Analysis and Report prepared in accordance with guidance contained in 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guideline to Good Practice (BRE 2011) ('the BRE Guide') and BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

The Proposed Development has been carefully designed to minimise overshadowing impact, both within the scheme and to adjacent properties, in addition to maximising daylight and sunlight into the proposed apartments.

The enclosed Daylight Analysis and Report concludes that 93% of units will exceed the minimum suggested levels for Average Daylight Factors. However, it is noted that specific apartments are marginal in terms of achieving the target daylight factor – notably, for 4 no. of the bedrooms with private setback terraces - although these are all within 10% of the recommended levels.

The BRE Guide notes that the guide itself '*is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location*'. It recognises that '*Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.*' Therefore, if the situation arises where the targets identified within the Guide are not achieved, these should be highlighted and either justified in the context of the development / site or where relevant and applicable, compensatory measure will be proposed.

In the context of the Proposed Development, it should be noted that daylight and sunlight to the proposed apartments has already been maximised through building orientation and increased window openings. The four no. bedrooms which do not meet the suggested Average Daylight Factors levels all

contain private set back terraces which although they limit the quantum of daylight to the interior of bedrooms they also provide a positive contribution to the overall quality of life within the development. Whilst four no. apartments contain bedrooms that are generally within 10% of achieving the recommended daylight factors, they do provide at least 2 hours (and in most cases 3 hours) of exposure to sunlight on the Spring Equinox (number of hours of sunshine per day for March 21, assuming clear skies) as defined by IS EN 17037:2018 Daylight in Buildings. Therefore, we are satisfied that the Proposed Development will provide appropriate standards of daylight and sunlight for all habitable rooms.

The Architectural Design Statement contains a shadow assessment (refer to Section 5.3) which demonstrates that the proposed courtyards receive sun for most of the year and that the impact on the neighbouring properties is limited in summer and during the spring / autumn equinox. The Proposed Development will have minimal impact on the building immediately to the east (Eaton Drive) since the frontage facing onto the Proposed Development is a gable end wall. The Proposed Development will have minimal impact on the Tuath Housing property immediately to the west due to the building being approximately 24m from adjacent building. The Proposed Development will have no effect on the building immediately to the south (Glebe House).

7.5 Noise Assessment

In line with pre-application advice received from the Council and Development Plan IE8 Objective 7 the design of the proposal has been informed by a Noise Assessment which considers the impact from the nearby national road on residential units and outdoor residential amenity spaces and recommends appropriate mitigation measures.

The Noise Assessment recommends 5 no. different façade design specifications to ensure that an acceptable internal noise environment is achieved within the proposed apartment building taking account of the findings of the external noise survey. The report recommends further good practice measures to further mitigate against noise ingress from the nearby road network:

1. No vents are used on the northern façade of the apartment block closet to the N7
2. Install a sound absorbing ceiling (Class C sound absorber or better) on the balconies located on the eastern and western façade in the northern portion of the apartment block to prevent reverberant noise build up.

In addition, Timber Noise Deflection Fencing at a depth of 1.8m will be erected along the northern boundary of the Site as detailed on the Landscape plan (No. 22116/LP/B). In conclusion the Proposed Development will ensure an acceptable internal residential noise environment in line with best practice with implementation of the mitigation measures detailed in the Noise Assessment. For further detail refer to the enclosed Noise Assessment.

7.6 Access and Parking

The site layout has been designed to prioritise sustainable modes of travel (walking and cycling) in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets ('DMURS') and Development Plan SM2 Objective 5.

The Proposed Development provides separate vehicular and pedestrian/cycle access from Tay Lane in order to provide a safe and comfortable environment for all having regard to the likelihood that some occupants would have reduced mobility. In compliance with the DMURS the carriageway width of the proposed access route is 5.9m wide. The proposed site layout provides safe and efficient access for all vehicles. The enclosed Vehicle Swept Path drawing (no. C014) demonstrates that refuse and fire

department vehicles can safely access, turn and exit the Site from eastbound and westbound along Main Street.

The main internal pedestrian route follows along the southern boundary. It is proposed to connect the proposed access route with Tay Lane to the west and Eaton Drive to the east in the interest of improving pedestrian permeability within the town centre.

The Development Plan does not contain specific car parking standards for age-friendly housing schemes however it acknowledges that a reduction in the normal car parking standards may be considered in retirement villages (i.e., independent housing units with limited or no on-site care facilities) subject to the Planning Authority being satisfied that an acceptable level of residential amenity will be provided and maintained (Section 12.6.6).

The Proposed Development provides 30 no. car parking spaces including: 3 no. disabled 'blue badge' spaces and 6 no. EV Charging spaces. It is proposed that 2 no. spaces will be reserved for users of the community space, 1 no. for the building manager and 3 no. for visitors. The overall figure of 30 No. spaces can be seen as striking a balance between apartment and retirement home standards. The occupier profile of 'age friendly' development is markedly different to that of a standard apartment scheme, which would require 53 No. spaces for full compliance with Development Plan standards. It should be noted that residents of 'age-friendly' schemes will have a far greater degree of independence than care home / retirement home residents and so providing a higher level of car parking, relative to the care homes standard, is justified. Furthermore, the majority of residents will not undertake daily work commutes which account for a high proportion of private car trips in a standard apartment development. Given that the site is within walking distance of local shops and facilities, providing a lower level of car parking relative to the standard for apartments is justified given the age profile and employment profile of the intended occupants.

The Proposed Development provides 80 no. cycle parking space including 56 long stay and 24 no. short stay. In accordance with the Development Plan all long-stay spaces will be covered and secure. All long-stay spaces are within a cycle store building. Short-stay spaces are conveniently located for visitors next to the Eaton Drive entrance and to the rear of the community facility building.

The proposed provision of 80 No. cycle spaces is 64% of the required provision for apartment developments. Given the targeted age profile for the proposed development, and the consequent reduced likelihood of cycling being a viable transport option for this age-cohort, this level of provision is seen as entirely justified.

7.7 Built Heritage and Architectural Conservation

The Development Plan aims to manage development to protect and conserve the Archaeological Heritage of the County (including monuments and sites) (Policy NCBH13) and ensure the protection of all Protected Structures including their curtilage and attendant grounds (NCBH19 Objective 1).

The design of the Proposed Development has been informed by an Archaeologist Desktop Study prepared in accordance with the Framework and Principles for the Protection of Archaeological Heritage (DAHG, 1999) and Guidelines on the Information to be contained in Environmental Impact Statements (EPA 2002, 2003, 2016).

The Site is within the zone of notification for a known archaeological site identified as St. Brigid's Holy Well (RMP DU021-030004) and is situated in proximity to the zone of notification for a known archaeological site identified as settlement cluster (RMP DU021-030008). As such, any works that impact on an RMP must be notified to the National Monuments Service of the Department of Housing, Local Government and Heritage, prior to commencement.

The enclosed Archaeologist Desktop Study concludes that the Proposed Development will directly impact on known archaeology. This archaeology is a known and legally protected archaeological site identified as St. Bridget's holy well. However, the extent and significance of the archaeology within the development location remains unknown. Consequently, archaeological mitigation measures are recommended for this project in order to ensure that the Proposed Development will not have a significant adverse impact on known archaeology as follows:

- Preservation in situ is the preferred outcome regarding known archaeology. Therefore, avoidance of any direct impacts on archaeology is recommended.
- Pre-construction archaeological test trenches should be excavated within the proposed development area. These test trenches should examine the nature and extent of the known archaeology and establish if any other archaeology is within the development site.

The proposed site layout has been designed to facilitate the in-situ preservation of the St. Bridget's holy well. The area directly above and surrounding the buried well is to be retained as a soft landscaped area as shown on the Landscape plan (No. 22116/LP/B).

As detailed, in Section 5 there are several Protected Structures in the vicinity of the Site. The nearest is Glebe House (ref. 313) which is located c. 28m south of the Site boundary. The site layout has been carefully considered to avoid any significant adverse effects on Glebe House as detailed in the Architectural Design Statement (refer to Section 3.2). The proposed apartment block is orientated in a north-south direction with the narrowest side of the building facing onto Glebe House. This minimises views of the Proposed Development in the background of Glebe House and also minimises the number of apartments 'over-looking' the Glebe House. Further, the Proposed Development will reinforce the existing boundary between the Site and the neighbouring property containing Glebe House through the planting of a native hedgerow buffer (1.2m tall) thereby creating a greater degree of visual separation between the two properties.



Figure 7.3. View of the Proposed Development (outlined in red) from Forest Hills with Glebe House shown in the foreground

It is considered that the Proposed Development will not have an adverse impact on the Glebe House since the proposed buildings will not alter the character of its surroundings; the design, scale, massing and material palette of the Proposed Development is entirely in keeping with surrounding properties in the foreground and background of Glebe House.

7.8 Flood Risk Assessment

In accordance with the Development Plan (IE4 Objective 1) this application is supported by a specific flood risk assessments prepared in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.

The flood risk assessment is contained in the submitted Engineering Report (refer to p14-30). The flood risk assessment finds that there is a remaining residual risk of flooding on-site from fluvial flooding due to local river/stream surcharging and sets out the following mitigation measures to adequately address the risk:

- Installation of permeable paving with sufficient sub-surface storage volume will allow for the predicted flood waters to be stored under the surface and infiltrate within the site after rainfall subsides.
- The proposed drainage system to be maintained on a regular basis to reduce the risk of a blockage. This new network shall also include the use of nonreturn valves to prevent the passage of water within the public network back into the proposed new development.
- Proposed surface water soakaways designed, and to be constructed, in accordance with BRE365: Design of Soakaways (2016). All rainwater collected on the new roof areas will be dispersed to the ground within the site area with no water discharging to the public network under normal conditions.
- The ground floor levels of the proposed buildings shall be constructed at approximately 2.4m above the adjacent road level. Therefore, there is no risk to the building from fluvial flood sources.

The Proposed Development has been designed to incorporate the above-referenced mitigation measures. The flood risk assessment concludes that the Proposed Development will not increase the run-off rates when compared with the existing site and satisfies the requirement of the SFRA to reduce flooding and improve water quality. Further it concludes that the proposed mitigation measures are sufficient to provide a suitable level of protection for the Proposed Development.

7.9 Services

This application is supported by an Engineering Report which should be read alongside this section. In accordance with Development Plan IE2 Objective 10 the Proposed Development incorporates a separate foul and surface water drainage system. The proposed surface water strategy is detailed under Section 7.3 of this report.

The proposed foul water drainage strategy comprises the construction of a new network of drainage infrastructure within the site which shall discharge to the public foul sewer system through a new connection via a 24m³ attenuation tank at times of reduced volumes (i.e., overnight). The attenuation tank will be decommissioned to allow the direct discharge to the public network once Irish Water upgrade works have completed (estimated completion date of early 2026). Correspondence received from Irish Water agreeing to the proposed foul water drainage strategy is shown in Appendix A of the Engineering Report.

Water will be supplied to the Proposed Development via a new connection to the public mains positioned along the centre line of Tay Lane. Correspondence received from Irish Water confirming the water connection is feasible is shown in Appendix A of the Engineering Report.

7.10 Energy Performance

In accordance with the requirements of the Development Plan this application is supported by an Energy Analysis Report which demonstrates how energy and climate change adaptation considerations have been inherently addressed in the design and planning of the scheme (H7 Objective 2, Section 12.10.1). In accordance with E5 Objective 5 an Energy Assessment Form is enclosed with this application.

The enclosed Energy Assessment Form confirms that a Building Energy Rating (BER) of A3 is targeted. The Energy Analysis Report details the design measures implemented to ensure that the proposed apartment building will comply with the 'Near Zero' Energy Performance of Buildings Directive as specified in Technical Guidance Document L 2019 (TGD L). The Proposed Development incorporates the following low energy technologies: Photo-Voltaic (PV) panels provided on the roof of the apartment building to meet the renewables and NZEB requirements of Technical Guidance Document L.

7.11 Building Management

The Proposed Development will comply with Section 12.6.6 of the Development Plan which requires retirement villages (i.e., independent housing units with limited or no on-site care facilities) including all housing units, infrastructure and amenities to be held in single ownership with lease agreements to the occupants and a management company in place to be responsible for all shared facilities.

The Proposed Development is sought to be delivered in conjunction with AHB Clúid Housing which has considerable experience in the management of age-friendly housing schemes. Clúid Housing has been consulted throughout the design process to ensure that the scheme conforms to their operational and quality standards. The proposed community centre will be available for residents to book through building management for residents and guests. The community centre will not be generally available to members of the general public except when visiting the facility as a guest.

In accordance with Section 6.13 of the National Apartment Guidelines (2020) and the Multi-Unit Developments Act (2011) a Building Lifecycle Report has been prepared for the Proposed Development which includes an assessment of costs on a per unit basis and details design and management measures which have been specifically considered by the Applicant to reduce costs for the benefit of residents.

7.12 Part V

Pursuant to Part V of the Planning and Development Act 2000 (as amended) a 20% social housing requirement will be applied to planning permissions for housing on all lands zoned solely for residential use, or for a mixture of residential and other uses except where the development qualifies for a modified or amended obligation or is otherwise exempted.

The Applicant intends to comply with Part V by the transfer of built units on site. Based on the plans and particulars submitted, it is envisaged that 12 no. units, which represents 21% of total units, will be provided for Part V. Further details are provided on the enclosed Part V Proposal Plans. Details of Part V costs have been submitted with this application following engagement with SDCC Housing.

7.13 Appropriate Assessment (AA) Screening

The Development Plan aims to protect Natura 2000 sites from any plans and projects that are likely to have a significant effect on their integrity (Policy NCBH3). In accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2009), screening for Appropriate Assessment has been carried out for the Proposed Development. This application is supported by an Appropriate Assessment (AA) Screening Report which should be read alongside this section.

The AA Screening Report considers whether there is potential for the Proposed Development to have likely significant effects on the conservation objectives or designation features of any European Protected Site (EPS) by applying the source - pathway - receptor model to define the likelihood of significant effects.

Adopting the precautionary principle, the AA Screening Report includes all European sites within a 15km distance of the Proposed Development in the source-path-way-receptor assessment. There are 10 no. European sites within the 15km radius. The Assessment detailed in Table 1 of the report concludes that there is no source-pathway-receptor connectivity between the Proposed Development and any European site and therefore there is no potential for impact.

The AA Screening Report determines that there is no potential for the development to have likely significant effects on the conservation objectives or designation features of any European Protected Site (EPS). Therefore, it is not necessary to carry out a Natura Impact Statement for the Proposed Development.

7.14 Proposed Planning Conditions

It is submitted that a Construction Management Plan and Construction & Demolition Waste Management Plan can be agreed with the Council by way of planning condition in advance of commencement of works once a contractor is appointed by the Applicant.

7.15 Conclusion - The Plan Approach

The Proposed Development has been designed in accordance with the 'The Plan Approach' which requires all new developments to be designed around eight overarching principles as detailed in the Development Plan (Policy QDP2 Objective 1). The Plan Approach aims to deliver sustainable communities and a healthier and better quality of life for all in the County.

This section summarises how the Proposed Development is consistent with the eight overarching principles drawing on the planning assessment and various technical reports and assessments submitted in support of the application.

Context: Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area.

This report and the enclosed Architectural Design Statement details how the Proposed Development has been carefully designed to protect and enhance built and natural heritage features on-site and in the surrounding area as follows:

- The site layout facilitates the in-situ preservation of the St. Bridget's holy well ((RMP DU021-030004). The area directly above and surrounding the buried well is to be retained as a soft landscaped area as shown on the Landscape Plan (No. 22116/LP/B).
- The proposed apartment block is orientated in a north-south direction with the narrowest side of the building facing on to Glebe House. This minimises views of the Proposed Development

in the background of Glebe House and minimises the number of apartments 'over-looking' Glebe House.

- Existing trees have been retained within the development wherever possible however 42 no. trees need to be removed to facilitate the apartment block. New high value tree and native hedgerow planting is proposed to compensate for the loss of existing trees and habitats. When all trees reach maturity the tree canopy will cover 19% of the Site area.
- The enclosed Ecological Impact Assessment demonstrates there would be no significant impacts on ecological receptors provided mitigation measures proposed are carried out.

Turning now to social and economic factors, the Proposed Development responds to the urgent need to provide additional purpose-built age-friendly housing in South Dublin to meet the growing demand for this type of accommodation driven by demographic change. The Proposed Development will provide further socio-economic benefits:

- The Proposed Development provides residents of retirement age with the opportunity to 'right-size' to a home which better meets their housing and care needs which in turn can help to unlock the supply of much-needed family housing in the County.
- The Proposed Development would provide much needed age-friendly housing in an area which currently has a noticeable shortfall of such housing and help to reduce demand and free up capacity of nursing homes for those most in need.

Healthy Placemaking: Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.

The Proposed Development has been designed to integrate with the existing context in terms of scale, form and materiality as detailed in the enclosed Architectural Design Statement and Townscape and Visual Impact Assessment. The design and layout of the Proposed Development has been informed by a careful consideration of surrounding land uses, especially sensitive uses and the character and scale of surrounding properties, especially the adjacent Glebe House Protected Structure. The Proposed Development will facilitate social interaction at the community level by providing elderly residents with the opportunity to stay living in their community in a home which is purpose built to better meet their needs. At Site level, the Proposed Development provides a mixture of communal spaces – including an indoor community centre and various outdoor spaces for recreation which aim to foster social integration between residents and visitors.

Connected Neighbourhoods: Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods

As detailed in Section 2 of this report, the Proposed Development is well connected to surrounding settlements and Dublin city centre via the public transport network and is within walking distance of bus stops in Rathcoole Town Centre.

Thriving Economy: Ease of access to and availability of good jobs and a good quality of life for the community at large.

As detailed in Section 2 of this report, the Site offers excellent connectivity to local amenities and is within walking distance of local shops and community facilities.

Inclusive and Accessible: High quality services, community infrastructure and open spaces accessible to all.

As detailed in Section 7.3 of this report, the Proposed Development provides a mixture of communal spaces – including an indoor community centre and various outdoor spaces for recreation which aim to

foster social integration between residents and visitors. The Proposed Development has been designed in accordance with Universal Design principles as detailed further in Section 7.2.6 and the enclosed Architectural Design Statement.

Public Realm: A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play.

As detailed in Section 7.3 of this report, the Proposed Development provides a mixture of communal spaces – including an indoor community centre and various outdoor spaces for recreation which aim to foster social integration between residents and visitors. The Proposed Development will deliver a significant improvement to the public realm in terms of design and connectivity. The proposal will secure the redevelopment of a derelict, disused town centre site and provide new high-quality purpose-built age-friendly housing units set within a highly landscaped setting. The Proposed Development will also improve connectivity and legibility within the town centre by providing a new pedestrian footpath between Eaton Drive to the east and Tay Lane to the west.

Built Form and Mix: Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure.

The Proposed Development has been designed to integrate with the existing context in terms of scale, form and materiality as detailed in the enclosed Architectural Design Statement and Townscape and Visual Impact Assessment. The height and density of the Proposed Development has been informed by a contextual assessment of surrounding built development and land uses, especially sensitive uses including the adjacent Glebe House Protected Structure and the Tuath Housing property.

Design and Materials: High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.

As detailed in the enclosed Architectural Design Statement (Section 4.4.), the Proposed Development incorporates a palette of high-quality materials which complement surrounding buildings and provide a durable finish that will age well thus minimising future maintenance costs. The enclosed Building Lifecycle Report accounts for the long-term and robust maintenance of the Proposed Development, including landscaping elements.

Summary

The planning assessment outlined in this Section demonstrates that the Proposed Development complies with the eight overarching principles for the achievement of successful and sustainable neighbourhoods which underpins the Plan Approach.

8.0 Conclusion

This application addresses the urgent need to provide additional purpose-built age-friendly housing in South Dublin as highlighted in the Development Plan to meet the increasing demand for this type of accommodation which is being driven by demographic change.

Planning policy at all levels encourages the development of purpose-built age-friendly housing such as this scheme to meet the housing and care needs of the growing elderly population. By providing older residents with the opportunity to 'right-size' to accommodation which better suits their needs the Proposed Development will help to unlock the supply of much-needed family homes and help to prevent unnecessary transitions to more acute care facilities thereby freeing up capacity for those most in need of nursing home spaces. Being centrally located in Rathcoole town centre the Site is ideally situated to provide age-friendly accommodation as recognised in the Development Plan and will facilitate aging in place in line with National, regional and local planning policy objectives. The Proposed Development will secure the regeneration of a vacant brownfield site and deliver age-friendly housing close to existing amenities and public transport within a town centre context. The Proposed Development contributes to the achievement of the following National and regional policy objectives:

- Responds to the urgent need for purpose-built age-friendly housing
- Ageing in Place
- Creation of an Age Friendly Society
- Compact Growth
- Providing at least 50% of new homes in Dublin's existing built-up footprint.
- Urban Regeneration
- Best use of existing transport infrastructure
- Increasing residential densities and building heights in appropriate locations

The final design proposal is the result of a carefully considered planning and design process which has been enhanced by consultation involving the design team, South Dublin County Council, Clúid Housing and Irish Water. We consider that the final proposal presents the optimum design solution for the Site:

- The Proposed Development involves the construction of a high-quality residential development in a landscaped setting that is respectful of its setting and in keeping with the character and scale of surrounding properties.
- The Proposed Development will enhance the amenity of the townscape – the proposal represents a significant improvement in terms of design quality and safety compared to the existing disused site.
- The Proposed Development will protect existing and future residents' amenity:
 - The site layout achieves minimum residential separation distances and exceeds the required setbacks from the N7 carriageway.
 - Noise Assessment – an acceptable internal residential noise environment can be achieved as per established best practice with the design specification and mitigation measures proposed.
 - Daylight and Sunlight assessment – the Proposed Development will provide appropriate standards of daylight and sunlight for all habitable rooms and 93% of units will exceed the minimum suggested levels for Average Daylight Factors. The shadow assessment demonstrates that the impact on neighbouring properties is limited.

- The proposed apartments conform to applicable standards contained in 'Sustainable Urban Housing: Design Standards for New Apartments' (2020) and all apartment areas exceed current HIQA bedroom standards.
- Energy Analysis Report and Building Lifecycle Report – the Proposed Development incorporates low energy design measures to ensure that the proposed apartment building will comply with the 'Near Zero' Energy Performance of Buildings Directive as specified in Technical Guidance Document L 2019 (TGD L).
- Ecological Impact Assessment – the Proposed Development will protect the ecological value of the Site and the surrounding area. The Ecological Impact Assessment concludes that there will not be any significant negative impact provided mitigation measures proposed are carried out in full.
- Archaeologist Desktop Study – archaeological mitigation measures are recommended for this project to ensure that the Proposed Development will protect surrounding architectural and archaeological heritage assets and their settings notably, St. Brigid's Well.
- Flood risk and drainage – the Proposed Development will not increase the risk of flooding on-site or elsewhere and will not be significant. A drainage strategy has been developed as an integral part of the proposal incorporating SUDS which will reduce existing run-off rates on-site.

This planning application is accompanied by an AA Screening Report which determines that there is no potential for the development to have likely significant effects on the conservation objectives or designation features of any European Protected Site (EPS). Therefore, it is not necessary to carry out a Natura Impact Statement for the Proposed Development.

We conclude that the Proposed Development will improve quality of life for residents in the County by improving housing choice and enhancing the mix of dwelling types in Rathcoole town centre. We therefore trust that it will meet with favourable assessment by South Dublin County Council.

For and on behalf of KPMG Future Analytics

Appendix 1 South Dublin County Development Plan (2022-2028) Policy Table

Table 1.1 South Dublin County Development Plan (2022-2028) policies and objectives

Policy / Objective
Ch. 3 Natural, Cultural and Built Heritage (NCBH)
<p>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</p>
<p>NCBH5 Objective 1: To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.</p>
<p>NCBH5 Objective 2: To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.</p>
<p>Policy NCBH13: Archaeological Heritage Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p>
<p>NCBH13 Objective 1: To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document.</p>
<p>NCBH13 Objective 2: To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects</p>
<p>NCBH13 Objective 3: To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.</p>
<p>NCBH13 Objective 4: To protect and preserve the archaeological value of underwater archaeological sites including associated features and any discovered battlefield sites of significant archaeological potential within the County.</p>
<p>Policy NCBH19: Protected Structures Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.</p>
<p>NCBH19 Objective 1: To ensure the protection of all structures (or parts of structures) and their immediate surroundings including the curtilage and attendant grounds of structures identified in the Record of Protected Structures.</p>
Ch. 5 Quality Design and Healthy Placemaking
<p>Policy QDP8: Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County's Building Heights and Density Guide 2021.</p>
<p>QDP8 Objective 1: To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a 'Design Statement'. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and</p>

Policy / Objective
Density Guide. Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).
Ch. 6 Housing
Policy H3: Housing for All Support the provision of accommodation for older people and people with disabilities and/or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.
H3 Objective 1: To support housing that is designed for older people persons and persons with disabilities and/ or mental health issues in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.
Policy H8: Public Open Space Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.
Policy H9: Private and Semi-Private Open Space Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.
Policy H13: Residential Consolidation Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.
Ch. 7 Sustainable Movement
Policy SM2: Walking and Cycling Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.
SM2 Objective 2: To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.
SM2 Objective 3: To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced by promoting compact growth and permeability in the design and layout of new development areas
SM2 Objective 4: To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.
SM2 Objective 5: To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.
Policy SM7: Car Parking and EV Charging Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities
SM7 Objective 1: To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility.
SM7 Objective 2: To limit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available.

Policy / Objective
<p>SM7 Objective 3: To implement area-based parking caps in locations where the highest intensity of development occurs and is promoted, such as town / district centres and higher-order public transport nodes.</p>
<p>SM7 Objective 4: To promote the provision and management of destination parking in areas of high trip demand, subject to appropriate pricing and locational criteria, taking into account the availability of more sustainable transport options.</p>
<p>SM7 Objective 5: To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</p>
<p>SM7 Objective 6: To promote appropriate parking arrangements for specific user requirements including disabled drivers, motorcycles and scooters in town and district centres, public transport nodes and other destinations.</p>
<p>SM7 Objective 7: To design and manage parking to ensure the efficient turnover of spaces within town, district and village centres and higher density development areas by applying the following measures:</p> <ul style="list-style-type: none"> - Ensuring that car parking is predominantly provided on-street and within communal and undesignated spaces, except in areas identified as tourist and food destination locations where additional widening of pedestrian areas is desirable necessitating the removal of on-street parking to facilitate - Placing restrictions on longer term parking.
<p>SM7 Objective 8: To require payment systems for car parks associated with major shopping centres and other large commercial developments where new facilities or major extensions to existing facilities are proposed.</p>
<p>SM7 Objective 9: To ensure that car parking is designed in such a manner as to promote visual amenity, green infrastructure, carbon sequestration and sustainable drainage (SuDS) by applying the following requirements:</p> <ul style="list-style-type: none"> - Provision of landscaping integrated into the design of all car parking, to include planting of native trees and pollinator species - Provision of not more than two parallel or five perpendicular spaces between trees/planting bays - Use of permeable paving, where appropriate.
<p>SM7 Objective 10: To ensure that parking provision, including the provision of EV charging facilities, does not detract from the comfort and safety of pedestrians and cyclists, visual amenity or the character of an area. (refer also to Chapter 10 Energy).</p>
<p>SM7 Objective 11: To review and seek to improve the issue of on-street car parking in housing estates to eliminate any road safety or social issues they present, where issues of safety are clearly identified.</p>
<p>Ch. 10 Energy</p>
<p>Policy E3: Energy Performance In Existing and New Buildings Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.</p>
<p>E3 Objective 1: To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance.</p>
<p>E3 Objective 2: To prioritise the retrofitting of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials when building from the ground up.</p>
<p>E3 Objective 3: To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.</p>

Policy / Objective
<p>E3 Objective 4: To support and facilitate the actions and targets of the National and South Dublin Climate Action Plans where they relate to private and public buildings in the County.</p>
<p>Ch. 11 Infrastructure and Environmental Services (IE)</p>
<p>Policy IE2: Water Supply and Wastewater Ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to support growth in jobs over the lifetime of the Development Plan facilitating environmental protection and sustainable growth.</p>
<p>IE2 Objective 1: To work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region.</p>
<p>IE2 Objective 2: To support Irish Water in delivering key water service projects in the County including:</p> <ul style="list-style-type: none"> - The Eastern and Midlands Region Water Supply Project. - Saggart Reservoir. - Upgrade of the 9B foul sewer. - Upgrade of the Dodder Valley Sewerage Scheme and work with Irish Water to tackle quickly the problems created by capacity issues regarding the Dodder Valley Sewer and in particular to encourage a pro-active response to surcharging into Dodder Valley Park to resolve the issue and mitigate the impacts on water quality, biodiversity, amenity and public health. - Upgrades to regional networks and treatment.
<p>IE2 Objective 3: To promote and support the implementation of the Greater Dublin Strategic Drainage Study, Dublin Region Local Authorities (2005) GSDSDS.</p>
<p>IE2 Objective 4: To support Irish Water in the delivery of the strategic objectives and strategic water and wastewater projects and infrastructure as set out in the Water Services Strategic Plan (2015), any subsequent plan, Irish Water's Capital Investment Plan 2020 – 2024, any subsequent Capital Investment Plans and the forthcoming National Water Resources Plan.</p>
<p>IE2 Objective 5: To prohibit the connection of surface water outflows to the foul drainage network where separation systems are available.</p>
<p>IE2 Objective 6: To work with Irish Water to reduce leakage in accordance with any forthcoming Regional Water Conservation Strategy.</p>
<p>IE2 Objective 7: To promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems – Code of practice.</p>
<p>IE2 Objective 8: To ensure on-going liaison and consultation with Irish Water to ensure that the water services infrastructure for the planned growth of the County, in line with the County's Core Strategy, is integrated into the relevant plans and capital programmes and to ensure that the design and layout of water services is fully considered to deliver sustainable growth.</p>
<p>IE2 Objective 9: To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system.</p>
<p>IE2 Objective 10: To require all development proposals to provide a separate foul and surface water drainage system – where practicable.</p>
<p>Policy IE4: Flood Risk Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.</p>
<p>IE4 Objective 1:</p>

Policy / Objective

To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.

IE4 Objective 2:

To require all developments in the County to be designed and constructed in accordance with the "Precautionary Principle" detailed in the OPW Guidelines.

IE4 Objective 3:

To continue to support and co-operate with the Office of Public Works in delivering the relevant Catchment-Based Flood Risk Assessment and Management Programme.

IE4 Objective 4:

To support and facilitate the delivery of flood alleviation schemes in South Dublin County, including the following schemes:

- Poddle Flood Alleviation Scheme.
- Camac Flood Alleviation Scheme.
- Whitechurch Flood Alleviation Scheme.