



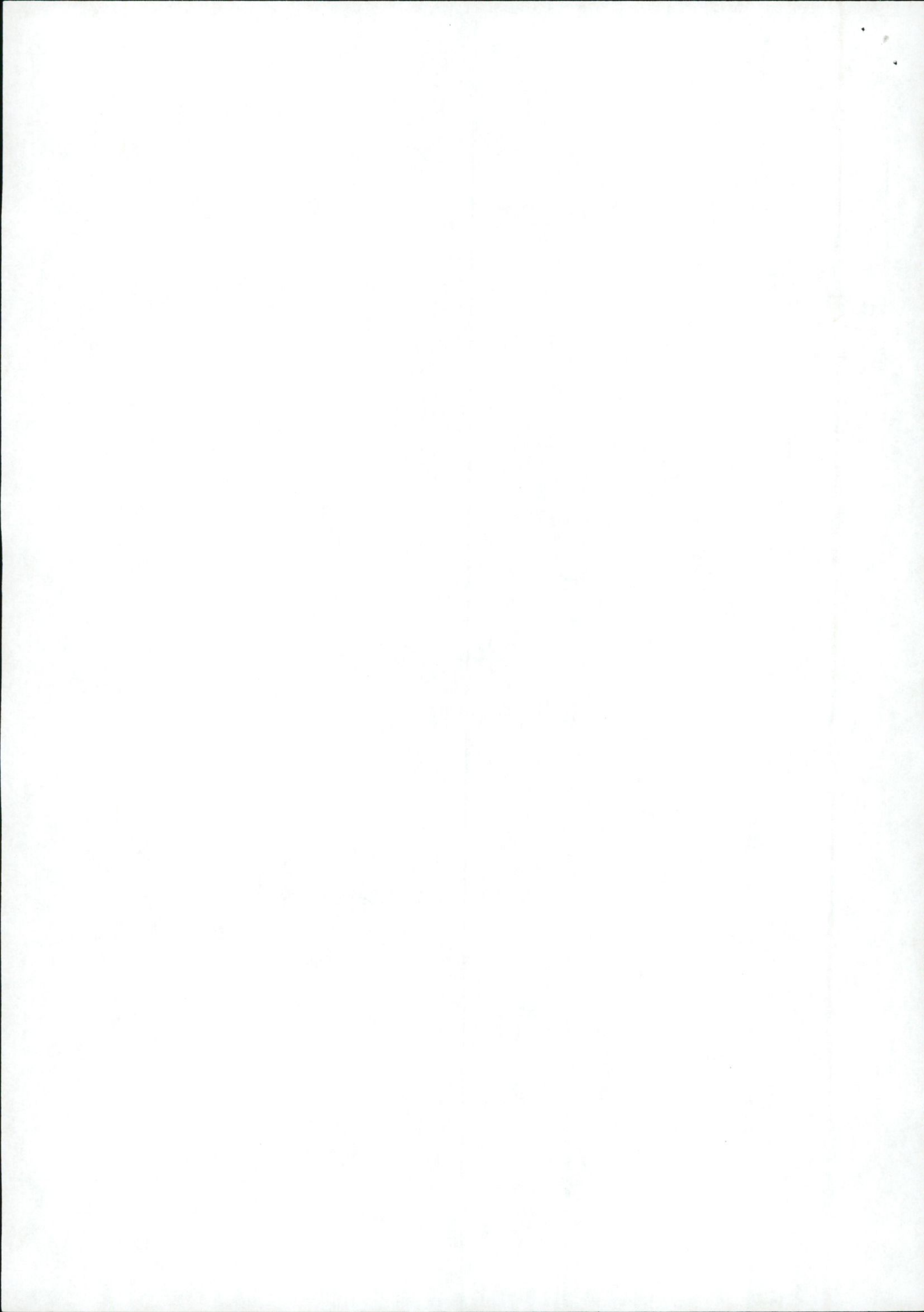
hw planning

Planning Statement

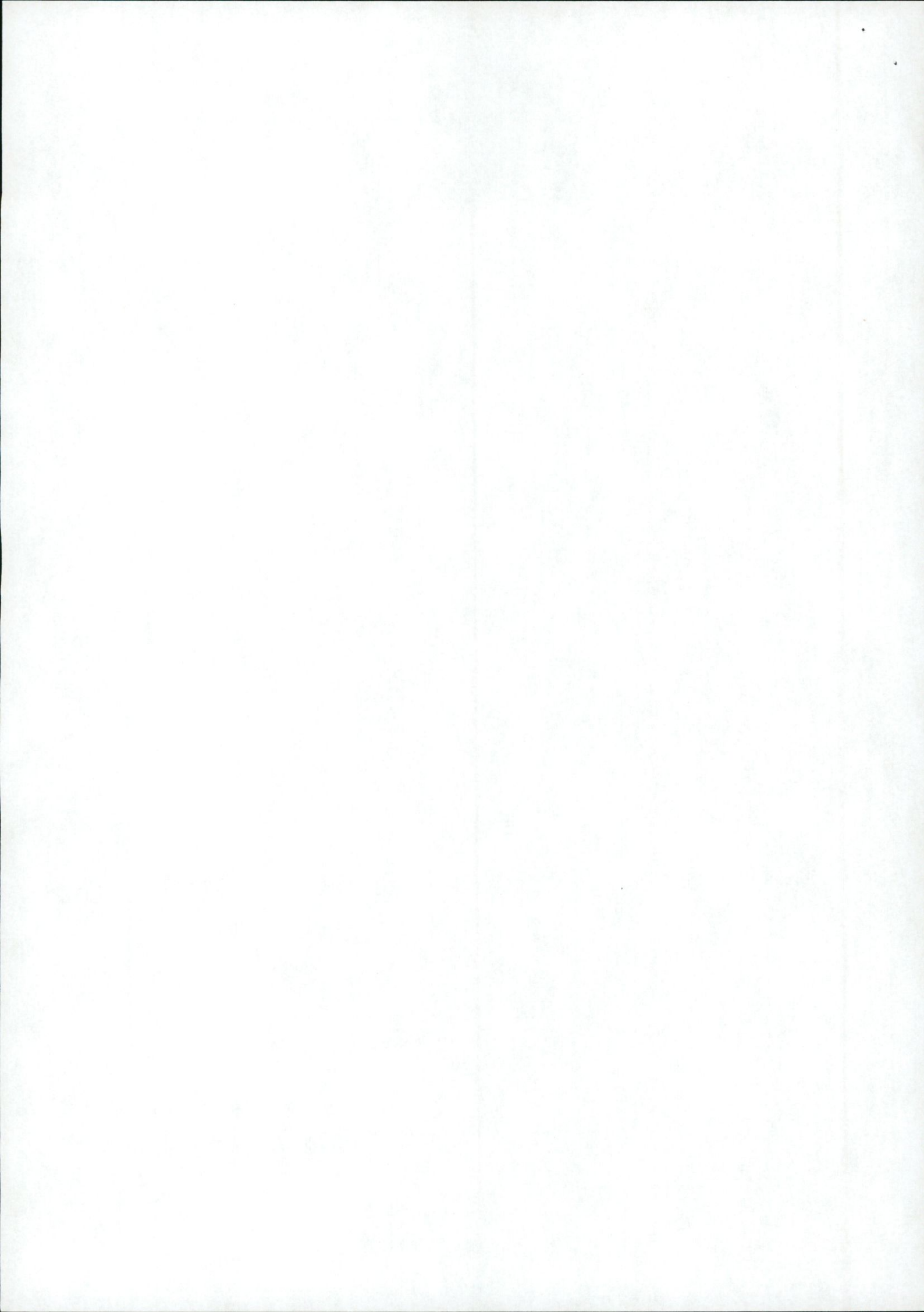
**Proposed Residential Development at Scholarstown House,
Scholarstown Road, Dublin 16.**

Client: Emmaville Limited

October 2022



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Connecting places.



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Site Context and Proposed Development

1.1 Introduction

This Planning Statement has been prepared by HW Planning on behalf of Emmaville Limited. It accompanies a planning application for the refurbishment of Scholarstown House to provide for 2 no. residential units and the construction of 74 no. residential units including all ancillary site development works at Scholarstown House, Scholarstown Road, Dublin 16, D16 E2H9.

This Planning Statement contains the following sections:

- Site Context & Proposed Development
- Planning Policy and Assessment
- Conclusions

1.2 Site Context

The 0.79 hectare site is currently comprised of a two storey dwelling, Scholarstown House which is listed on the Record of Protected Structures (RPS no. 322) and NIAH (Ref: 11216036), and a number of outbuildings located at the junction of Scholarstown Road and Orlagh Grove, Dublin 16. It represents a prominent corner off a local roundabout which is c. 350m away from the M50 motorway. The site is bounded to the east by St. Colmcille's Community School and to the south by a small parade of local services which include a Spar convenience store, a creche, a beauty clinic and two takeaways. There is an existing apartment development to the north of Scholarstown Road, and a large Strategic Housing Development of 590 residential units was permitted on lands adjacent to the site, which is currently under construction.



Figure 1 – Aerial View of Site and Surrounding Context

Scholarstown is situated 8.5km south west of Dublin City Centre and is located within the M50 ring road. The site is located within Rathfarnham which is a well-established residential suburb served by an abundance of local amenities. The site is in close proximity to a number of parks including Knocklyon Park, Edmondstown Park and Marley Park (see Figure 2).

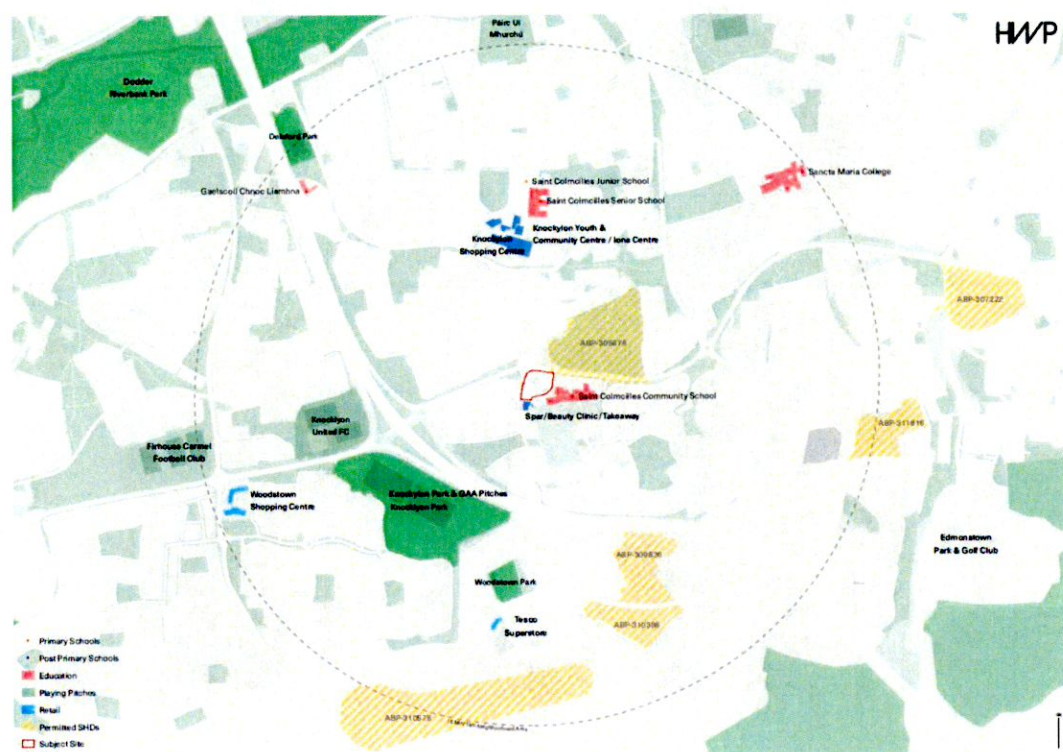


Figure 2 – Site Context Map

The site is within walking distance to a number of amenities including Knocklyon Shopping Centre (5-minute walk) where many retail units, health facilities and a restaurant are located and Knocklyon Youth and Community Centre and Iona Centre (8-minute walk) where a number of classes and courses are held. The site is also 1.8km away from Knocklyon GAA and Knocklyon United FC.

The site is afforded good public transport accessibility levels which includes access to Dublin Bus route no.'s 15 and 175 which run on a frequent timetable, from bus stops located immediately adjacent to the application site on Scholarstown Road. In addition, a bus stop serving Dublin Bus Route no. 15B is an 8-minute walk away from the site. The 15 and 15B bus routes connect the site to Rathgar, Rathmines and Dublin City Centre, while the 175 bus route connects the site to Tallaght, Dundrum Town Centre and University College Dublin (UCD) all of which are major employment centres.

In addition to the existing bus network, the BusConnects program of works to be undertaken by the National Transport Authority NTA will further improve the connectivity of the site to the wider Dublin area. The BusConnects plan will see a new spine route A1 (Beaumont – City Centre – Knocklyon) passing within 80m of the proposed development. The proposed frequency of service on the A1 spine route will be 12 to 15 minutes during weekdays. The plan will also include a new orbital route S8 (Tallaght– Sandyford – Dun Laoghaire) again passing by the proposed development. The proposed frequency of service on the Orbital route S8 will be 15 to 20 minutes during weekdays. These services will be rolled out in the coming years by The National Transport Authority (NTA) (see Figure 3).



Figure 3 – Connectivity Map of Site and Surrounding Area

1.3 Planning History

Based on a review of the South Dublin County Council Planning Enquiry System, there is no formal planning history on the subject site.¹

1.3.1 Pre-Planning Discussions

A pre-planning meeting (Ref: PP054/22) was held via Microsoft Teams on the 3rd August 2022. This statement outlines and considers the principal planning matters, as well as addressing the issues and gaps in information highlighted by South Dublin County Council during the S.247 pre-planning consultation which include:

- Works to Scholarstown House
- Design and layout
- Landscape strategy and biodiversity
- Vehicular access arrangements and refuse collection
- Car and bicycle parking
- Daylight/Sunlight

¹ As accessed on the 16th of September 2022.

- Unit mix

1.4 Proposed Development

The design rationale is to create and deliver a high quality sustainable residential development within this infill site that respects its setting within the curtilage of Scholarstown House.

The development will consist of:

- a) The demolition of the 4 no. existing shed structures on site within the curtilage of the protected structure.*
- b) The retention and conversion of Scholarstown House (Protected Structure) into two no. residential units comprised of 1 no. 2-bed and 1 no. 3-bed units served by private open space in the form of ground floor terraces. The proposed works to Scholarstown House include but are not limited to internal re-configuration; the re-location of the staircase to its original location within the house; the removal of non-original features including the closing up of non-original openings; and the creation of a new door opening within the existing alcove, and the blocking up of a window opening both located on the northern elevation.*
- c) The construction of an apartment block ranging in height from 3 to 5 storeys containing 74 no. apartment units comprised of 32 no. 1-bed apartments, 33 no. 2-bed apartments, and 9 no. 3-bed apartments all served by private open space in the form of balconies and/or ground floor terraces.*
- d) The proposed development also includes 100 sq.m of residential amenities and facilities consisting of but not limited to a reception, communal amenity room and parcel room.*
- e) The development will be served by a total of 40 no. car parking spaces and 183 no. cycle parking spaces accessed via a new pedestrian and vehicular access off Orlagh Grove with the existing entrances on Scholarstown Road and Orlagh Grove being re-configured to provide for pedestrian and cycle access.*
- f) The development will also consist of all ancillary development works required to facilitate the development including but not limited to, plant rooms, a substation, bin stores, landscaping, boundary treatments and lighting.*

The proposed development comprises the carrying out of works to a protected structure: Scholarstown House (RPS Ref: 322).

1.4.1 Improvement Works to St. Colmcille's Community School

The proposed development includes works to improve the health and safety of the staff and students of St. Colmcille's Community School. During early engagement in 2021 between the applicant and the school board, a pinch point was identified to the south east of the application site with the boundary of the school where there is currently conflict between cars and pedestrians due to the curved shape of the existing boundary wall. It is proposed to re-position the boundary wall at this location to alleviate this issue. Please refer to drawing no. DR-A-0035 for further information.

1.4.2 Works to Protected Structure

Scholarstown House is a detached three-bay, two-storey house with a three-storey return to the rear which was completely rebuilt following a fire in c. 1909. This historic dwelling contains a modest amount of early twentieth-century architectural fabric including ground-level fire surrounds,

Edwardian-style molded plaster detailing and stone windowsills within the masonry walls. This material which is of limited historic interest will be retained as part of the proposed new development, with the only losses being portions of unremarkable masonry walls where new or enlarged openings are proposed to facilitate safe access and communication within the dwelling, or existing simple stud walls which do not permit a usable layout within the present house which will be replaced with new partitions.

The existing slate-clad roof, eaves gutters, chimney stacks, wall masonry and all other historic features will all be conserved in accordance with best practice to retain the distinctive appearance of the extensively re-constructed building which is listed on the NIAH and Record of Protected Structures. A full breakdown of the interventions to Scholarstown House can be found within the Architectural Heritage Impact Assessment prepared by John Cronin & Associates.

1.4.3 Design

The development seeks to balance the provision of a residential apartment scheme complimented with amenity spaces designed to benefit the future occupants of the scheme.

The proposed development provides for a mix of one, two and three bed units which will provide accommodation for a mix of occupiers including single people, couples, families and downsizers.

These external landscaped spaces include pedestrian routes through a variety of soft landscape treatments dispersed with seating areas, play areas and plazas. The communal open spaces are separated from the public open spaces sensitively with soft landscape features which prevents the public from entering the resident communal open spaces in a non-intrusive manner.

The scheme includes private amenity spaces which are accessible off the primary living spaces to each apartment unit. These private amenity spaces are provided in the form of balconies which are a feature on the upper level apartments. Private terrace areas with separation/privacy planting are provided on those units which open onto ground level. A number of top floor units also benefit from roof terrace style private amenity space.

As a whole the scheme is a well-considered quality new building which respects and responds to the existing Scholarstown House which will be renovated and re-used as part of the overall development.



Figure 4 – CGI of Proposed Development within Wider Site Context

1.4.4 Landscape

The landscape proposal for the proposed development has been designed to incorporate the following:

- Enhance the landscape setting of Scholarstown House
- Provide for usable open spaces suitable for all ages
- Enhance biodiversity on the site by replacing non-native species with native species of plants
- Incorporate nature based SuDS where feasible

The design concept was developed and expanded to create landscaped spaces around the existing house that respected its setting but with a modern twist that reflects the proposed modern apartment blocks and open space use. This is achieved by utilising the geometry within the existing house and its setting and reflecting it within the proposed design while incorporating off-kilter with diagonal lines and proportional radii which are symmetrical and aligned with the existing house. The planting design was developed around creating a strong, structured and dynamic aesthetic, whilst contributing to biodiversity through the use of native species, retaining native trees where possible and the inclusion of pollinator friendly plants which overall enhance the setting of the protected structure.



Figure 5 – CGI of Proposed Development within Wider Site Context

1.4.5 Traffic and Transport

A Traffic and Transport Assessment prepared by Martin Hanley Consulting Engineers is submitted under separate cover which assesses the proposed development in the context of the traffic volumes for the existing and future conditions should planning permission be granted on the site and confirms that the operation impact of the proposed development will not have a detrimental impact on the surrounding traffic network.

1.4.6 Daylight/ Sunlight

A Daylight/Sunlight Assessment has been prepared by 3DDB which assess the Daylight and Sunlight of the proposed development and properties located in the surrounding area. These reports confirm that the proposed development as designed, meets the BRE Guidelines in terms of

Daylight/Sunlight, and that the proposed development will not have a adverse impact on any existing properties in terms daylight/sunlight or overshadowing.

1.5 Key Site Statistics

Key Site Statistics	
Site Area	0.79 hectares
No. Units	76
Public Open Space	1,570 sq.m
Communal Open Space	487 sq.m
Density	96 uph
Site Coverage	27%
Plot Ratio	0.98
Car Parking Spaces	40 (0.5 spaces per unit plus)
EV Parking Spaces	8 spaces (20%)
Cycle Parking Spaces	183

Planning Policy and Assessment

2.1 National Planning Policy

2.1.1 Project Ireland 2040: National Planning Framework

The National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is outlined as being to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role. We consider that the following are the key National Policy Objectives relevant to the proposed development are as follows;

- **National Policy Objective 2A:** A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs'.
- **National Policy Objective 3A:** 'Deliver at least 40% of all new homes nationally, within the existing built-up footprint of existing settlements'.
- **National Policy Objective 11:** 'In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth'.

2.1.2 Housing for All: A New Housing Plan for Ireland

The action Plan for housing and homelessness is based around 4 pathways which aim to allow for the building more homes to suit the populations needs, as well as improving the rental sector. The document recognises the need for the delivery of additional houses in order to alleviate the current housing crisis. The plan includes a number of action points relating to the 4 pathways, pathways 1, 2 and 3 are relevant to the proposed development:

- 01 Supporting Home Ownership and Increasing Affordability
- 02 Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion
- 03 Increasing New Housing Supply
- 04 Addressing Vacancy and Efficient Use of Existing Stock

2.2 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, the proposed development falls within an Intermediate Urban Location where densities of greater than 45 units per hectare will be accepted subject to meeting development management standards.

The design criteria for apartments are contained within the main body of the Guidelines and in Appendix 1. Quantitative standards for inter alia, unit size, internal space standards, dual-aspect ratios and amenity spaces are also set out within these Guidelines. The scheme is designed in compliance with the standards and the Housing Quality Audit prepared by C + W O'Brien Architects confirms this.

2.3 Regional Planning Policy

2.3.1 Eastern and Midlands Regional Assembly: Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (Eastern and Midland Regional Assembly) came into effect in July 2019. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region. The strategy includes a number of regional policy objectives which are relevant to the proposed development:

- **RPO 3.2** – Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.
- **RPO 3.3** – Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'.
- **RPO 5.3** - Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
- **RPO 5.4** - Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'¹³, 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities'.
- **RPO 5.5** - Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement

Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

- RPO 9.30 - Support the sensitive re-use of protected structures.

2.4 Local Planning Policy

2.4.1 South Dublin County Council Development Plan 2022-2028

The South Dublin County Development Plan 2022-2028 is the relevant statutory Development Plan for the area.

Zoning

The subject site is zoned Objective RES, the objective of which is '*To protect and/or improve residential amenity.*' where residential is a primary use.

From a zoning perspective, the use of the site residential development is consistent with the land use zoning applying to the site, and we would also note that the use of the application site for residential use is already established with the existing dwelling on the site 'Scholarstown House'.



Figure 6 – Extract from SDCC Interactive Zoning Map with Site Outlined in Red

2.4.2 Residential Development

Chapter 6 of the County Development Plan sets out the stands with regard to residential development for South Dublin.

Infill Development

H13 Objective 2 of the Development Plan encourages the use of underutilised sites for residential development subject to meeting the criteria as set out in the Plan in relation to residential development:

H13 Objective 2 - To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring.

The proposed development represents an infill development of a currently underutilised site. The development provides for a total of 76 no. units on a 0.79 ha site occupied by Scholarstown House (RPS Ref: 322) in a well-established residential area in close proximity to a number of amenities. The proposed development has been designed to comply with all qualitative and quantitative standards as set out in the County Development Plan and Ministerial Guidelines and therefore complies with the above policy as outlined in the Housing Quality Assessment prepared by C+W O'Brien Architects.

Unit Mix

The Development Plan outlines in H1 Objective 12 that a minimum of 30% 3-bedroom units should be provided, however a lesser provision may be acceptable where it can be demonstrated that the proposed housing mix meets the specific demand required in the area within a 10-minute walk of the site.

H1 Objective 12 - Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:

- *there are unique site constraints that would prevent such provision; or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- *the scheme is a social and / or affordable housing scheme.*

The proposed development includes a total of 13.5% no. 3-bedroom units which is considered appropriate based on the specific housing demand identified in the area. A breakdown of the total percentage of unit types is outlined in the table below:

Unit Mix		
Unit Type	No. of Units	% of Units
1-Bed	32	42
2-Bed	34	45
3-Bed	10	13
Total	76	100

Table 1 – Proposed Unit Mix

A key objective of the proposed development is to provide a variety in housing scales across the site. Following an assessment of the evolving housing market and engagement with local auctioneers² it is recognised that a development providing for 13.5% of 3-bed units would better respond to the local housing demand in the Scholarstown area and also provide a more diverse development, positively contributing to a greater housing mix.

The Statement of Housing Mix prepared has analysed the current unit mix in the prevailing area, and this report concludes that:

“the proposed scheme mix, by delivering predominantly 1 and 2 bedroom units will positively contribute to the specific housing demand of the Scholarstown area and assist the entry of first time buyers and smaller family units into the property market, as well those wishing to downsize from larger family units.”

It is therefore considered that the proposed housing mix proposed is acceptable for the area given the current market demands and a review of prevailing house sizes in the area surrounding the site.

Design and Layout

The design and layout of the proposed development has been carefully considered in compliance with the Development Plan Policies and Objectives to ensure that the development is of a high-quality design and there is no detrimental impact on adjoining properties or to the protected structure on site, Scholarstown House. The following policies apply to the proposed development:

Policy H7 - Residential Design and Layout: Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H10 – Internal Residential Accommodation: Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

It is considered that the proposed development represents a high-quality scheme which has been designed to respect and enhance the protected structure on site, Scholarstown House. The proposed unit mix of 1, 2 and 3-bedroom units provide for a scheme which is flexible and adaptable as it will provide for unit sizes to suit first time buyers, families and downsizers.

Public and Communal Open Space

Chapter 6 of the County Development Plan sets out the standards with regard to public open space for new residential development. In this regard, the following policies apply:

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.

H9 Objective 2: To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.

² Refer to accompanying letter prepared by CBRE, Valuer & Property Consultant and Statement of Housing Mix.

Land Use	Public Open Space Standards (Minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

Figure 7 – Extract from Table 12.22 of the Development Plan Outlining Minimum Public Open Space Standards

The proposed development includes a total of 1,570sq.m of public open space and 487sq.m of communal open space within the proposed development which is in excess of the minimum requirements. These areas have been designed to be usable by future occupants of the development and includes open grassed areas which can be used for an array of activities as well as more formal areas including a neighbourhood play area.

Open Space	Requirements	As Proposed
Public	10% of the Site Area or 790 sq.m	24% or 1,570 sq.m
Communal	487 sq.m	487 sq.m

Table 2 – Breakdown of Proposed Open Space

2.4.3 Protected Structures

The Development Plan encourages the re-use of Protected Structures which have had regard to their setting and special character and appearance. The following policies therefore apply:

Policy NCBH19: 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.

NCH19 – Objective 3: To address dereliction and to welcome, encourage and support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures consistent with RPO 9.30 of the RSES.

The proposed development represents a high-quality infill residential development which has been designed to respect the character, setting and architectural heritage of Scholarstown House. The proposed development ensures that the protected structure is re-used and incorporated into the overall site development and will be converted into 2 no. residential units ensuring that the use of the building will carry on indefinitely. As outlined in the Architectural Heritage Impact Assessment:

"The architectural heritage of the protected structure will be retained and conserved within the proposed contemporary scheme. It is not considered that the nineteenth-century iteration of Scholarstown House was ever a landmark residence, nor did its form or architecture have any significant visual contribution to the wider area given the extensive planting indicated around the site on nineteenth-century historic maps..."

The proposed changes to Scholarstown House itself are wholly appropriate and no material of architectural significance will be removed. The proposed use is wholly appropriate and will ensure that the protected structure has a viable long-term future use that is sympathetic to its significance. The project architects and landscape designers have prepared a scheme that provides ample private amenity and visual setting to this historic property."

It is therefore considered that the re-use of Scholarstown House and the demolition of the existing shed structures within the curtilage of the protected structure are acceptable in planning policy terms.

2.4.4 Car and Cycle Parking

As set out in Table 12.23 of the County Development Plan, a minimum of 1 cycle parking space is required to serve each bedroom. In total, 130 no. cycle spaces are required to meet the standards as set out above.

Category	Land-Use	Long Term	Short Stay
Accommodation	Hotel'	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms

Figure 8 - Extract from SDCC Development Plan Table 12.23 – Minimum Cycle Parking Standards

The proposed development includes a total of 143 dedicated cycle parking spaces to serve the proposed apartment units which is above the requirements as set out in the County Development Plan.

The site is located within zone two for the purpose of calculating car parking spaces where a maximum of 0.75-1.25 car parking spaces per unit.

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

Figure 9 - Extract from SDCC Development Plan Table 12.26 – Maximum Car Parking Standards

A total of 40 no. car parking spaces (ratio of 0.5 spaces per unit) are proposed to serve the development which is considered consistent with the Development Plan which states that a lower parking ratio would be considered where the proposal meets the criteria as set out in Section 12.7.4 which states:

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

- *The proximity of the site to public transport and the quality of the transport service it provides*
- *The proximity of the development to services that fulfil occasional and day to day needs*
- *The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development*
- *The ability of people to fulfil multiple needs in a single journey*
- *The levels of car dependency generated by particular uses within the development*
- *The ability of residents to live in close proximity to the workplace*
- *Peak hours of demand and the ability to share spaces between different uses*
- *Uses for which parking rates can be accumulated, and*
- *The ability of the surrounding road network to cater for an increase in traffic.*

In response to Section 12.7.4, the proposed development provides for a car parking ratio of 0.5 spaces per unit which aims to encourage future occupants of the scheme to use more sustainable modes of transport such as walking, cycling and public transport.

As previously outlined, the site is afforded good public transport accessibility levels which includes access to Dublin Bus route no.'s 15 and 175 which run on a frequent timetable, with from Bus Stops located on Scholarstown Road c. 1-3 minute walk from the site. In addition, a bus stop serving Dublin

Bus Route no. 15B is located an 8-minute walk away from the site. The 15 and 15B bus routes connect the site to Rathgar, Rathmines and Dublin City Centre, while the 175 bus route connects the site to Tallaght, Dundrum Town Centre and University College Dublin (UCD) all of which are major employment centres within the South Dublin County Council administrative area, and on this basis, it is considered that the level of car parking proposed is acceptable at this location.

In addition to the existing bus network, the BusConnects program will further improve the connectivity of the site to the wider Dublin area. Route A1 (Beaumont – City Centre – Knocklyon) (12-15 minute frequency), and the orbital route S8 (Tallaght– Sandyford – Dun Laoghaire) (15 to 20 minutes during weekdays) will both serve the site once implemented by the NTA.

A Mobility Management Plan³ has been prepared to encourage existing and future residents to increase modal shift away from car use to more sustainable modes of transport. This will be achieved through the implementation of the mobility management plan prepared and through the car parking strategy proposed.

As per the Development Plan, Section 12.7.5, a minimum of 20% (8 no.) of the total parking spaces provided within the proposed development will be fitted with EV charging stations as part of the proposed development with the remainder of the parking spaces capable of accommodating future charging points.

2.4.5 Part V

Part V, S.96 of the Planning and Development Act (as amended) applies to this application. New provisions relating to Part V under the Affordable Housing Act 2021 were formally enacted on 1st August 2021. Part V drawings⁴ accompany this planning application where 20% of the proposed units will be transferred to South Dublin County Council to meet the applicants Part V obligations.

The Part V units identified are as follows:

- 6 no. 1-bedroom apartments
- 6 no. 2 bedroom apartments
- 3 no. 3-bedroom apartments

2.4.6 Green Infrastructure/Biodiversity

Chapter 4 of the South Dublin County Development Plan sets out the Council's aims to protect and enhance the Green Infrastructure of South Dublin in line with Policy G11 and other objectives outlined below:

Policy G11 - Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.

G11 Objective 4 - To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but

³ Prepared by Horganlynch Consulting Engineers

⁴ Prepared by C+W O'Brien Architects

not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.

GI2 Objective 1 - To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.

GI Objective 2 - To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.

The proposed landscape strategy has been designed to include the following features/strategies which are considered to be in compliance with the policies as listed above:

- Utilise the network of paths, roads and open spaces within the development to create landscaped (GI) corridors for wildlife.
- Corridors have been located to link up all open spaces within the proposed development and connect to the wider green infrastructure network across the surrounding established residential areas, M50 corridor and the new Two Oaks residential development to enable healthy and sustainable communities.
- The proposals will seek to retain and enhance existing natural features across the site, wherever possible.
- All planting will be selected that is supportive of the All Ireland and Pollinator Plan.
- The proposed species rich grassland and native wildflower mixes will create swards of diverse meadow grassland which will support a rich diversity of invertebrates, bird and mammal species.
- Sustainable Urban Systems (SUDS) in the form of swales and permeable paving will be provided across the proposed development to control and manage surface overflow. These have been designed and incorporated into the landscape and provide biodiversity benefits.

2.5 Requirement for Environmental Impact Assessment

The subject development does not fall within development classes set out in Part 1 Schedule 5, however, the proposed development does fall within the category 'Infrastructure Projects' of Schedule 5, Part 2 (10)(b), which outlined that a mandatory EIA must be carried out for the following projects:

- i. Construction of more than 500 dwellings*
- ii. Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.*
- iii. Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.*
- iv. Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.*

The proposed development therefore does not trigger a requirement for mandatory EIA for the following reasons:

- The proposed development consists of 76 no. residential units which falls well below the threshold of 500 dwellings.
- The site area at 0.79 hectares is well below the threshold of 10 hectares.

2.5.1 Sub-Threshold EIA

Schedule 5, Part 2, (15) outlines that any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development, but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7. In cases where a project is mentioned in Part 2 but is classed as "subthreshold development", as is the case for this proposed development, it is necessary for the Competent Authority, which in this case is South Dublin County Council, to undertake a case-by-case examination about whether the development is likely to be associated with significant effects on the environment, unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment.

Having regard to the nature of this proposed development and the existing environment it is considered that a preliminary examination is sufficient to rule out likely significant environmental effects. The following assessment have been carried out to inform this decision:

- Tree Survey and Arboricultural Assessment
- AA Screening
- Bat Survey
- Engineering Services Report including Flood Risk Assessment
- Traffic and Transport Assessment
- Daylight and Sunlight Assessment
- Landscape and Visual Impact Assessment

On this basis, it is therefore considered that a sub-threshold EIAR is not required in this instance.

Conclusion

The principle of residential development on the site is well established given the sites history and zoning designation. The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy. The proposed development offers a unique opportunity to transform this under-utilised infill site into a vibrant new neighbourhood, which will contribute to the supply of much needed housing in Scholarstown and the wider Dublin 16 area.

The architectural drawings, considered in conjunction with the Architects Design Statement and Housing Quality Assessment demonstrate the applicant's commitment to delivering a well-designed scheme considerate of its history and location. The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the site's context.

The proposed development will support the key objectives contained in the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and South Dublin County Development Plan 2022-2028 by providing additional housing on an appropriately zoned site in a serviced area, within an existing built-up area. The provision of residential units at this location will further support the growth of Rathfarnham as an important suburb within the South Dublin County Council administrative area.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located, as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality development which is now being submitted for the consideration of South Dublin County Council.

Appendix A – Maps
