

DOWNEY



Planning Statement

**Lands at Old Nangor Road,
Clondalkin, Dublin 22**

Applicant: Dublin Simon Community

October 2022

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1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Statement, on behalf of the applicant, Dublin Simon Community, to accompany a planning application to South Dublin County Council for a proposed social housing development on lands at Old Nangor Road, Clondalkin, Dublin 22. The proposed development, as per the statutory notices, consists of the following:

“Planning permission is sought by Dublin Simon Community for a proposed social housing development on lands at Old Nangor Road, Clondalkin, Dublin 22. The proposed development will consist of 10 no. one bed units in a two-to-three storey apartment building, associated car parking and bicycle parking, bin store, water pump house, new vehicular access onto Old Nangor Road, new pedestrian access onto Old Nangor Road, landscaping, boundary treatments, public lighting, and all associated site and engineering works necessary to facilitate the development.”

This report sets out the planning rationale and justification for the proposed development and demonstrates how the proposal accords with the proper planning and sustainable development of the area. This statement should be read in conjunction with the plans, drawings and documentation submitted as part of the overall planning pack.

2.0 SITE LOCATION & DESCRIPTION

The subject site is situated on Old Nangor Road, Clondalkin, Dublin 22, and is therefore within the administrative area of South Dublin County Council. Clondalkin is a large suburban centre that is situated 11 kilometres west of Dublin City Centre and offers a wide range of amenities and services.

The subject site itself extends to an area of approximately 0.121 ha. The site is roughly L-shaped and is bounded for the most part by a high block wall. The front boundary is delineated by a stone wall and entrance which is angled to the road. The entrance shares a set back with the adjoining entrance to the local pitch and putt club. The site is bounded to the east by a vacant protected structure. The surrounding area is predominantly mixed-use residential/commercial with a row of two-storey terraced houses directly across the road from the subject site and a fast-food restaurant, snooker club and the Mill Shopping Centre in close proximity.

The site is well served by public transport, having access to the 13, 68, 69, 76, L54, 68, and the 76A Dublin Bus routes. The Clondalkin Fonthill train station is located approximately 1.5 kilometres, a 17-minute walk from the subject site to the north. The M50 is situated a 5-minute drive away which provides the area with access to the national motorway network and Dublin City.



Figure 1: Aerial View of the Subject Area, with subject site [approximate boundary in red] (Aerial Source: Google Earth)



Figure 2: Aerial View of the Subject Site [approximate boundary in red] (Aerial Source: Google Earth)



Figure 3: Street view of the Subject Site



Figure 4: Clondalkin Town Centre with significant surrounding amenities & services available in 10-minute immediate vicinity, with public transport routes outlined in yellow (Source: Google Earth)

3.0 PLANNING HISTORY

Downey have carried out a search of the relevant planning history pertaining to the subject site and immediate area, which shall be summarised below.

The subject site:

- **Reg. Ref. SD03A/0978; ABP Ref. PL06S.206553** – On 22nd December 2003, a planning application was made to South Dublin County Council for the following development: *“Construction of 9 no. apartments in 2 blocks comprising: 2 no. 2 bedroom apartments in block no. 1 (2 storey) and 7 no. 2 bedroom apartments in block no. 2 (4 storeys) and associated site works, landscaping and boundary treatment”*. Planning permission was refused by South Dublin County Council on 23rd February 2004 and this decision was upheld by An Bord Pleanála on 22nd July 2004, following a first party appeal. There were 2 no. reasons for refusals raised concerns regarding the design of the proposal and the inconsistency of the proposal with the open space zoning objective designated for the lands at the time.
- **Reg. Ref. SD05A/0370** – On 11th May 2005, a planning application for the following development was made to South Dublin County Council: *“Apartment building containing 6 no. two bedroom apartments and 1 no. one bedroom apartment with associated car-parking, boundary treatment, landscaping and all associated site development works with access/egress to Old Nangor Road”*. By Order dated 4th December 2006, South Dublin County Council granted planning permission for this proposed development, subject to 18 no. conditions. This permission was not implemented and has since expired.
- **Reg. Ref. SD16A/0450:** By order dated 21st July 2017, South Dublin County Council granted Dublin Simon Community planning permission subject to conditions for a proposed development consisting of the following: *‘A social housing development comprising of 10 one bed units in a three storey apartment building, associated car parking and bicycle parking, bin store, new vehicular access onto Old Nangor Road, new pedestrian access to replace existing vehicular entrance, landscaping, boundary treatments and all associated site and engineering works necessary to facilitate the development.’* A pre-planning meeting took place prior to the making of the application between Downey Planning (Agent), Michael Mohan Architects, Dublin Simon Community and South Dublin County Council.

South Dublin County Council sought further information on 22nd February 2017 and the applicant responded on 17th May 2017. The further information saw the evolution of the proposed development’s design. Planning permission was subsequently granted, subject to conditions.

The aforementioned planning permission pertaining to the application site confirms that a residential apartment development is appropriate and acceptable for this town centre site. At this juncture, it must be stressed that Dublin Simon Community were in advanced stages of the construction tender process for implementing the 2017 permission including appointment of consultants, appointment of contractors, production of tender/construction drawings and completion of extensive site investigation work. However, due to unforeseen circumstances which occurred during the lifetime of

the planning permission including the Covid-19 pandemic, supply chain issues, etc., Dublin Simon Community could not commence the development prior to its expiration. Efforts were made to extend the life of the permission but with the removal of economic, commercial and technical grounds from planning legislation, the extension of duration application was refused as substantial works had not been carried out, a requirement under the Planning and Development Act, 2000 (as amended). Planning application Reg. Ref. SD16A/0450/EP refers.

In light of these circumstances, this new planning application essentially represents the resubmission of the previous planning permission granted on the site and incorporates much of the planning compliance submission matters of the 2017 planning permission and engineering matters which have since transpired following extensive site investigation work.

Nearby planning permissions of note:

- **Reg. Ref. SD18A/0271:** On 24th January 2019, South Dublin County Council granted permission with conditions for a proposed development consisting of the: *'Construction of a community housing scheme for the elderly arranged in 4 blocks of 1-5 storeys with lower ground floor entry level to Blocks A, B and C. The scheme will comprise 99 1-2-bedroom apartments consisting of 76 1-bedroom, 21 2-bedroom and 2 studio apartments for visitors with northwest, southwest, southeast and northeast facing balconies/terraces, ancillary areas including plant/stores to Blocks A and C, communal areas/facilities, and entrance lobby in Block B (c.194sq.m) and bin storage and plant room in Block D (c.106sq.m), lobby, stair, and lift access'*. This permission is still active.
- **Reg. Ref. SD11A/0043:** On 20th April 2011, South Dublin County Council granted Clondalkin Paper Mills Sports & Social permission with conditions for a proposed development consisting of the following: *'Demolition of existing club house, re-configuration of existing pitch and putt course and the construction of new 499sq.m. clubhouse, footbridge and 56 no. car parking spaces, with new entrance from Old Nangor Road and associated landscaping and ancillary works, all consequent to the proposed development of the Metro West rail line.'*

4.0 DESCRIPTION OF PROPOSED DEVELOPMENT

The applicant, Dublin Simon Community, is applying for planning permission for a social housing development on lands at Old Nangor Road, Clondalkin, Dublin 22. The proposed development, as per the statutory notices, provides for the following:

"Planning permission is sought by Dublin Simon Community for a proposed social housing development on lands at Old Nangor Road, Clondalkin, Dublin 22. The proposed development will consist of 10 no. one bed units in a two-to-three storey apartment building, associated car parking and bicycle parking, bin store, water pump house, new vehicular access onto Old Nangor Road, new pedestrian access onto Old Nangor Road, landscaping, boundary treatments, public lighting, and all associated site and engineering works necessary to facilitate the development."

As previously mentioned, this planning application essentially represents the resubmission of the previous planning permission granted on the site and incorporates much of the planning compliance

submission matters of the 2017 planning permission and engineering matters which have since transpired following extensive site investigation work.

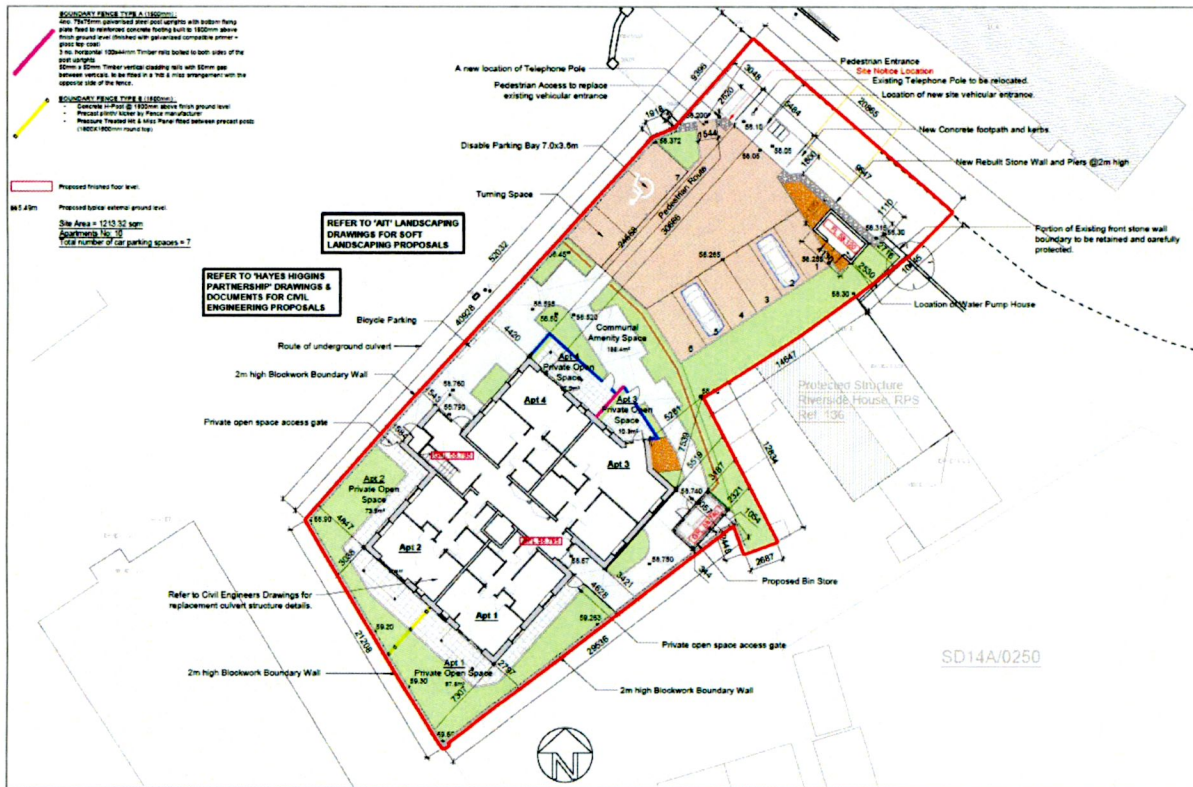


Figure 5: Proposed Site Layout Plan

The proposed apartment building is a two-three storey structure consisting of 10 no. 1-bed units. The proposed building has been sited to the rear of the subject site. Access to the site and car parking area will be provided via a vehicular access onto Old Nangor Road. There will be a total of 7 no. car parking spaces including 1 no. disabled car parking space. Given the site’s central urban location within a town centre in close proximity of public transport and within walking distance of a wide range of amenities, services and employment opportunities in the heart of Clondalkin, it is considered that the quantum of car parking proposed is appropriate in this case and accords with the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’ and the proper planning and sustainable development of the area. In addition, bicycle parking is being provided as part of the overall development.

There are a total of 10 no. one bed apartments proposed over three floors. The proposed apartments exceed the apartment design standards contained within the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’. All 10 no. apartment units are dual aspect, with private amenity spaces provided in the form of patios at ground floor level and balconies on the first and second floor level, with all private amenity spaces meeting the apartment guideline standards as depicted on the architectural floor plan drawings submitted as part of the application. Given the site’s location within Clondalkin town and indeed the site’s close proximity to an abundance of excellent public amenities/recreational resources such as golf courses, playing pitches, Corkagh Park, etc., it is considered that the quantum of communal/public open space provided as part of the scheme, in addition to the generous sized balconies and terraces, is appropriate in this instance.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is therefore considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site. Due consideration has been given to the surrounding existing structures within the immediate environs of the site, particularly the protected structures. The proposed development is respectful of the established character of the area in terms of heights, materials, finishes, etc., and is of a form and density that is compatible with the surrounding area. Special attention has been paid to the surrounding area and the setback of the units on the upper floors ensures that the overlooking is minimised. Therefore the proposed development, at a height of 3 storeys (2 storey plus 1 setback storey), can be considered appropriate within a town centre site. Please refer to the plans, sections, and elevation drawings prepared by Walsh Associates for further details on the design of the proposed development.

Overall, planning permission is being sought for the development of this infill urban site which consists of underutilised zoned, serviced lands. The proposed development will provide for the renewal of the subject site by delivering a high-quality scheme that will integrate with the existing surrounding area. It is submitted that the proposed development addresses the immediate need for social housing in South Dublin County as identified in the *Housing Action Plan 2022 to 2026*.

4.1 Dublin Simon Community



Dublin Simon Community is focused on providing supportive services at all stages of homelessness and are focused on providing supportive alternatives to people living in despair, enabling them to rebuild their lives and empower them to secure a safe home of their own

Dublin Simon Community are an Approved Housing Body and Charity organisation providing independent, medium, and high support housing projects for those who have been impacted by long-term homeless. As a community, Dublin Simon Community support people to exit homelessness, access and retain homes, and rebuild lives by delivering housing, health and wellbeing services. Their vision is to 'making home a reality'.

Dublin Simon Community, in conjunction with South Dublin County Council, have identified an urgent need to provide residential units for single users in the Local Authority's administrative area. The proposed development will assist in addressing this immediate need for social housing in the area. Dublin Simon Community have a Housing Management Service, set up in 2014, to manage accommodation. The team act as a point of contact if there are existing concerns with accommodation with the tenants, residents, and the surrounding neighbour locality. The team provide services such as housing allocation with the relevant local authority, pre-tenancy, training, independent living support, estate management, repairs and maintenance for all independent accommodation managed by Dublin Simon Community.

5.0 PLANNING CONTEXT

5.1 National and Regional Planning Context

5.1.1 Housing for All

In September 2021, the Government launched the *Housing for All* policy, which is the Government’s mission to tackle the housing crisis, through increasing the supply of housing to 33,000 annually on a national scale between 2021 and 2030. It is a multi-annual, multi-billion investment plan which seeks to improve Ireland’s housing system and deliver a range of housing tenures across the country, with various housing needs and demands met.

Tenure	2022	2023	2024	2025	2026	2027	2028	2029	2030
Social homes	9,000	9,100	9,300	10,000	10,200	10,200	10,200	10,200	10,200
Affordable & Cost Rental homes	4,100	5,500	6,400	6,400	6,100	6,300	6,400	6,300	6,300
Private Rental and Private Ownership homes	11,500	14,400	17,750	18,200	19,800	20,400	21,500	23,000	24,000
Total Homes	24,600	29,000	33,450	34,600	36,100	36,900	38,100	39,500	40,500

Figure 6: Projected Housing Output on annual basis up to 2030

It is the objective of the Government through Housing for All to deliver good quality homes to every citizen within the State through:

- Purchasing or Renting at an affordable price;
- Built to a high standard and in the appropriate location;
- Offer a high quality of life.

Housing for All contains four pathways in achieving the policy objectives through:

- Supporting home ownership and increasing affordability;
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- Increasing new housing supply;
- Addressing vacancy and efficient use of existing stock.

There are a set of objectives that aim to achieve the vision of implementing the housing strategy on a national level. The housing policy objectives that are relevant to the application on Old Nangor Road are the following:

HPO1: Enable Homeownership and Increase Affordability

HPO3: Work towards Ending Homelessness by 2030

HPO4: Increase Social Housing Delivery

HPO12: Deliver a new approach to active land management

HPO19: Address Vacancy in housing

HPO21: Drive social sustainability and foster sustainable communities

The proposed residential scheme of 10 social housing units would contribute to meeting the objectives and vision of the *Housing for All* government strategy, and it is a development that is dedicated to social housing supply delivery.

5.1.2 Project Ireland 2040: National Planning Framework

The *National Planning Framework*, under Project Ireland 2040, provides the overarching vision and development strategy to shape the national, regional, and local spatial development of Ireland to 2040. It composes of 10 National Strategic Outcomes which highlight the investment priorities to achieve sustainable development throughout Ireland.



Figure 7: The 10 National Strategic Outcomes for Project Ireland 2040

A key focal point within the NPF within Chapter 2.6 is a focus on compact and sustainable growth in development, putting an emphasis on the livability and quality of life within urban spaces and ensuring that regeneration and redevelopment initiatives are encouraged.

Chapter 4 of the NPF outlines the need to enhance the experience of people living and working in urban places within Ireland, and must put an emphasis on making cities, towns, and villages become more viable and attractive. It is **Objective 4** of the NPF to:

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

A sustainable approach to housing is essential in the development of vibrant neighbourhood environments that residents can interact with. It is important for planning and development to take a holistic sustainable approach, especially with the revitalisation of vacant buildings, infill and brownfield sites that are derelict or vacant and not in use.

Below is a suite of National Policy Objectives that are relevant to the current application:

NPO 3a: *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

NPO 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.*

NPO 4: *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

NPO6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area*

NPO13: *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.*

NPO28: *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*

NPO32: *To target the delivery of 550,000 additional households to 2040.*

NPO33: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

NPO34: *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*

NPO35: *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 proposed development will meet multiple National Strategic Outcomes regarding sustainable development for the future. This is further supported on a regional and local level, with more specific objectives, which will be explored in the next sections.

5.1.3 Regional Spatial and Economic Strategy Eastern and Midland Regional Assembly

The *Eastern Midlands Regional Assembly Regional Spatial and Economic Strategy 2019 - 2031 (RSES)* provides the 12-year strategic development framework for the Eastern and Midland Region. The principal purpose of the RSES is to support the implementation of *Project Ireland 2040*, by providing a more in-detail strategic plan that applies to the relevant area. The RSES is to be implemented by local authorities through the establishment of Development Plans and Economic and Community Plans that resonate with the policies set out.

Within Chapter 2, the RSES sets out the Strategic Vision for settlement and economic growth for the Eastern Midlands Regional Assembly area. These are supported by the 16 Regional Strategic Outcomes that align with policy recommendations in achieving sustainable development. The three key principles behind sustainable development of urban settlements are healthy placemaking, climate action and economic opportunity.

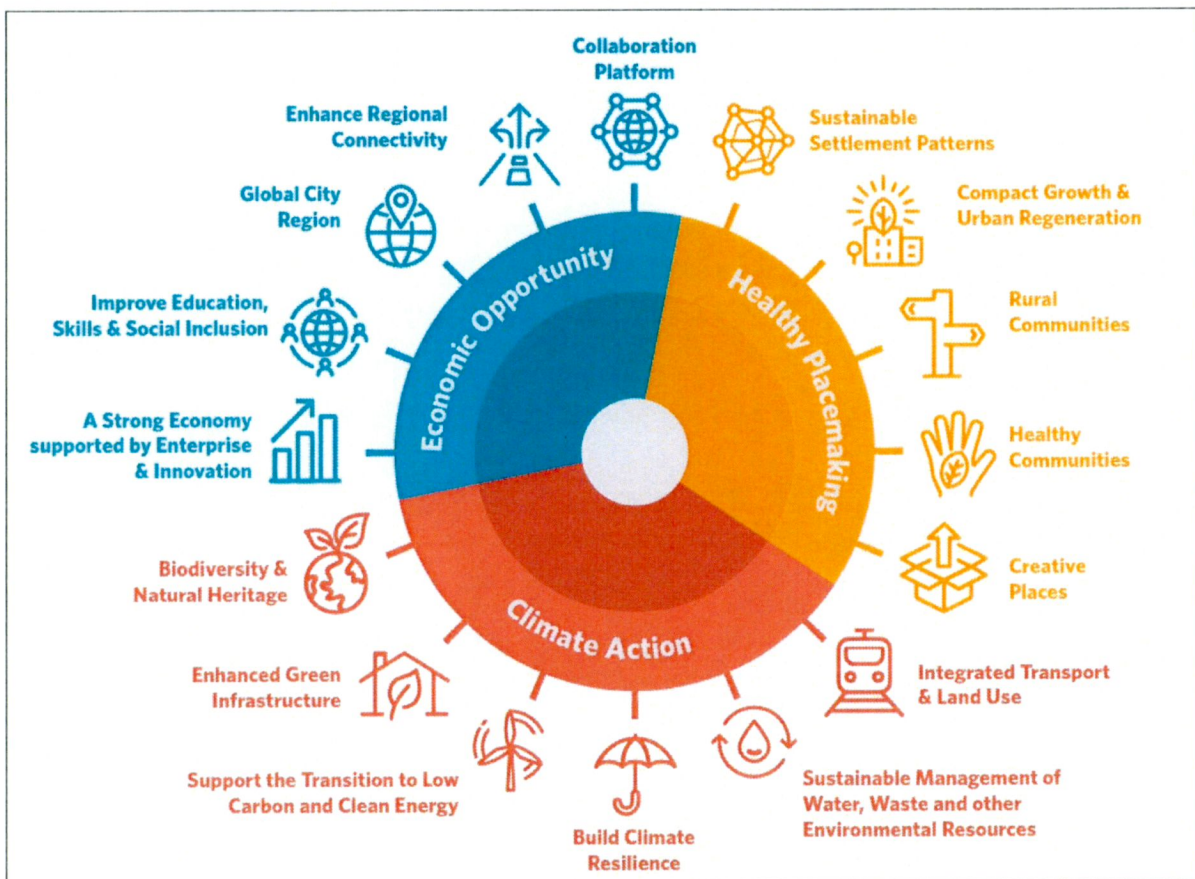


Figure 8: The 16 Regional Strategic Outcomes within the RSES

The RSES sets out the settlement hierarchy and provides guidance and objectives to encourage for sustainable development within the hierarchy to the discretion of local authorities to adopt the vision of the RSES. The applicants site falls under the Dublin Metropolitan Area Strategic Plan (MASP), which is a 12-to-20-year strategic planning and investment framework for the Dublin metropolitan area that underpins the National Planning Framework. Within the MASP, the site falls under the ‘Dublin City & Suburbs’ boundary of the Metropolitan plan for Dublin. Regarding housing development, a priority objective the MASP aims to achieve is the following:

‘Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport’ pp. 101.

Policies that are relevant to the development of housing within the MASP region that apply to the application site are the following:

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 9.1: *Local authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that everyone, including older people, disabled people and people with young children can move around with ease, avoiding separation or segregation*

RPO 9.12: *In Planning policy formulation and implementation local authorities and other stakeholders shall be informed by the need to cater for all levels of disability, through the appropriate mitigation of the built environment, and in particular for the needs of an ageing population*

The proposed development will contribute to the surrounding area in the context of these RPOs, that support the National Planning Framework, which have been set out to guide sustainable development on a regional basis, which is further supported by local policy and objectives.

5.1.4 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ build on the content of the 2015 apartment guidance, much of which remains valid, particularly with regard to design quality safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that, “in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than

30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years.”

The Guidelines also state that, *“aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *make better provision for building refurbishment and small-scale urban infill schemes;*
- *address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduces costs.”*

The HQA prepared by Walsh Associates submitted as part of this application outlines how the proposed development is consistent with these standards.

5.2 Local Planning Context

5.2.1 South Dublin County Development Plan 2022 - 2028

The *South Dublin County Development Plan 2022 – 2028* provides the overarching spatial planning framework for the subject area. The main objective of the Development Plan is putting a focus on the places where people live, the places where people work and the interaction and movement between these places while sustainably managing the environment. There is an emphasis on making the most efficient use of land and existing infrastructure by focusing development on urban infill and brownfield lands, in an aim to rejuvenate these lands and reduce urban sprawl challenges.

The subject site is zoned under Objective TC (Town Centre), which provides for the following:

To protect, improve and provide for the future development of Town Centres.

A range of use classes that are permitted in principle and open for consideration within Objective TC zones can be found in *Table 1*. The proposed development is permitted in principle under zoning objective TC.

Whilst the subject site is not located within an Architectural Conservation are (ACA), it is situated near the boundary of the Clondalkin Village ACA. Due consideration has been given to this area through the design evolution of the proposed development.



Figure 9: Zoning Land-Use Map within South Dublin County Development Plan with Subject Site Lands

Use Classes Relating to Zoning Objective TC	
Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car park, Childcare Facilities, Community Centre, Conference Centre, Crematorium, Cultural Use, Doctor / Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Home Based Economic Activities, Hospital, Hotel / Hostel, Housing for Older People, Industry-Light, Live-Work Units, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq. m, Offices 100 sq. m-1,000 sq. m, Offices over 1,000 sq. m, Off-Licence, Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Residential , Residential Institution, Restaurant / Café, Retail Warehouse, Retirement Home, Shop Local, Shop-Major Sales Outlet, Shop-Neighbourhood, Sports Club / Facility, Stadium, Social Club, Veterinary Surgery, Work-Live Units.
Open for Consideration	Allotments, Industry-General, Motor Sales Outlet, Outdoor Entertainment Park, Recycling Facility, Science and Technology Based Enterprise, Service Garage, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.

Table 1: South Dublin Development Plan 2022 - 2028 Zoning 'TC' Objectives

Development Management

A suite of policies that are relevant to the planning application that contributes to the provision of 10 social residential units are as follows:

Policy CS4: *Facilitate the re-use and regeneration of vacant sites and landbanks through various measures to promote compact urban growth in line with the Core Strategy.*

Policy CS7: *Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary*

Policy H1: *Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review.*

H3: *Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed-use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.*

Policy H13: *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*

PHP32: *It is a Policy Objective to support the provision of homeless accommodation and/or support services throughout the County.*

Policy H1 is further supported by Objectives 3, 4 and 6 which are the following:

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.*

Objective 4: *To recognise the urgent need for the increased provision of social and affordable housing to ensure that all residents in South Dublin County have access to a home. Such provision shall be made through working with approved housing bodies and co-operatives to provide for social and genuinely affordable housing accommodation to meet housing needs. This shall be carried out through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, cost rental leasing, and housing supports including RAS and HAP or any other mechanism promoted under Government Housing Policy, with priority given to new builds and renovations whenever available.*

Objective 6: *To provide social and affordable housing over the Plan period to meet forecast future housing need as identified in the Housing Strategy and interim HNDA.*

As Dublin Simon Community is an identified Approved Housing Body, the proposed development would support these policies and objectives in providing housing stock for those who are more vulnerable within society, in which there is a significant demand that needs to be met. The provision

of 10 social housing units would help alleviate the demand and contribute to the Housing for All policy, as well as the Housing Delivery Action Plan 2022 - 2026. The proposed development represents an appropriate use of the infill site.

In regard to the creation of sustainable neighbourhoods, the following policy applies:

Policy QDP2: *Overarching – Successful and Sustainable Neighbourhoods: Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.*

12.5.2: *Applications for new development shall be accompanied by a statement from a suitably qualified person detailing how ‘the plan approach’ has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed.*

The statement of how the ‘plan approach’ has been taken into consideration and incorporated within the design of the development, through the 8 criteria, is provided below, and further supported by the Architectural Design Statement prepared by Walsh Associates. Relevant policies throughout the Development Plan that are applicable to the plan approach will be provided in how the proposed development is in accordance with the proper planning and sustainable development of the area:

The Context

Policy QDP3: *Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.*

The proposed development will rejuvenate a site that is currently derelict and underutilised, and represents an appropriate development for the area, as it is situated within a Town Centre, in which there is a wide range of amenities and services. It achieves the 15-minute city that is advocated for throughout the RSES and Development Plan in establishing strong communities that have a high level of access to local goods and services.

Healthy Placemaking

Policy QDP4: *Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in*

Inclusive and sustainable placemaking has been incorporated into the design of the proposed development, with inclusivity at the forefront, which also connects with 5. *The Delivery of High-Quality and Inclusive Development*. Semi-private and private amenities have been provided throughout the proposed development and exceed the minimum standards, which achieves the policy objectives of **Policy H9:** *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.*

High-quality landscaping is proposed as part of the overall development. The Landscaping Report submitted as part of this planning application details the soft and hard landscaping plans for the proposed site which will contribute to the placemaking of the area. The 10 residential units are

disability access friendly, ensuring that the landscape plans are accessible for those with limited mobility. The design holistically takes into account healthy placemaking.

Connected Neighbourhoods

Policy QDP5: *Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities*

The proposed development incorporates the concept of the 10-minute neighbourhood, by being within the town centre of Clondalkin. There is a wide range of amenities, goods, services, employment opportunities and open spaces present within a 10-minute walking distance from the subject site.

It is a well-connected neighbourhood, with a wide range of bus public transport options available. The proposed development will be sufficiently served by surrounding amenities, employment, services, and transport options. It will also provide bike storage within the semi-private amenity area, and the provision of 7 car parking spaces including 1 disabled car parking space.

Public Realm

Policy QDP6: *Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.*

The public realm is important for the enjoyment of the residents and their interaction with the surrounding environment. The proposed development has incorporated elements of public realm within the proposed design, in which green infrastructure, landscape plans, lighting plans and structural layout has been taken into consideration in the formulation and presentation of the final design. The old stone wall to the front of the site will be restored and contribute to the public realm on Old Nangor Road. The subject site is also well served by amenities, leisure facilities, surrounding open spaces and parks in the vicinity of the neighbourhood.

The Delivery of High-Quality and Inclusive Development

Policy QDP7: *Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.*

The delivery of high-quality and inclusive development is important and the proposed development exceeds the minimum standards that are set out within the Sustainable Urban Housing: Design Standards for New Apartment Guidelines 2020 in relation to floor plans space, private open spaces, etc. An inclusive approach has been taken, in ensuring for universal access within and from the apartment building. The proposed development is in accordance with the delivery of a high-quality and inclusive development, and this can be seen through the architectural drawings prepared by Walsh Associates.

Appropriate Density and Building Heights

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.*

Policy QDP9: *Apply a context driven approach to building heights in South Dublin, as supported by South Dublin's Building Heights and Density Guide*

The proposed design has an appropriate setback from Old Nangor Road, in which a two-to-three storey design approach has been taken to ensure that overlooking will not occur and that the proposed development will not dominate the streetscape or detract from the existing buildings in the surrounding vicinity of the site. Regard has been given to the protected site adjacent to the development, in which an appropriate set-back has been implemented.

As the subject site is zoned as Town Centre, the Development Plan highlights the importance of compact development within these land-use zones. Under Policy QDP8 and QDP9, SDCC is to encourage for a context approach, in this instance of more compact infill developments to occur within the boundary of the town centre, in order for the long-term sustainability of residential development within these areas due to their close proximity to amenities and services.

Downey are of the considered opinion that the proposed density of the two-to-three storey design of the building is in compliance with the policies and objectives set out within the Development Plan, taking into account the surroundings adhering to the building and apartment guideline standards, and the *appendix 10* of the Development Plan: *Building Height and Density Guide 2022*.

Mix of Dwelling Types

The proposed development consists of 10 no. 1 bed apartment units. This planning application essentially represents the resubmission of the previous planning permission granted on the site for 10 no. 1 bed units (Reg. Ref. SD16A/0450) and incorporates much of the planning compliances matters of the 2017 planning permission and engineering matters which have since transpired following extensive site investigation work. There is clear recognition in this case of the need for single social housing residential units within the area between South Dublin County Council and Dublin Simon Community. It is a social housing development, in which **Policy H1** objectives acknowledges that lesser provision of the requirement of a residential mix may be considered regarding specific demand.

Materials, Colours and Textures.

Policy QDP11: *Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency*

The design incorporates material, colours and textures that tie in with the surrounding streetscape of the area. The landscape plan submitted as part of this planning application, as well as the landscape report, justifies the material, colours and texture choices that were made in relation to hard landscaping finishes.

It is submitted that the overarching eight key design principles have been considered and these are applied throughout the residential scheme, which represents a high-quality development and will contribute to the proper planning and sustainable development of Clondalkin's Town Centre area and is in compliance with **Policy QDP1** of Chapter 5 within the Development Plan of creating a healthy sustainable community.

Open Space

The provision of open space that is appropriately designed and located is a key element in the provision of high-quality residential developments. There should be active and passive recreational value within the site plan. The policy that applies to the provision of open spaces is follows:

Policy H8: *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 H11: *Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing*

The proposed development has taken into consideration the hard and soft landscape features that would enhance the open space of the area and provide clear hierarchies of the open spaces. There is a clear hierarchy with the proposed development, with a separation between the open space and the semi-private amenity space. It is submitted that the proposed development is in compliance with Policy H8 and fulfils Policy H11 in conjunction with Policy H9 which provides for the clear distinction of open spaces and semi-private spaces in the development.

In conjunction with open spaces, it is important that dwellings provide for a high-quality provision of semi-private and private open spaces in the design. The following policy sets out the provision for semi-private and private open spaces:

Policy H9: *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.*

The proposed development is in compliance with the minimum standards set out within the *Sustainable Urban Housing: Design Standards for New Apartments 2020*, in which there is a high provision of open spaces incorporated into the design. All residential units are provided with their own private spaces, in the form of patios at ground floor level and balconies on the upper floors that meet the minimum standards. These also serve as passive surveillance onto the surrounding open spaces and frontage of the apartment, ensuring for the privacy and security of the residents.

In light of the above, it is submitted that the proposed development is in compliance with the policies and objectives of the South Dublin County Development Plan 2022 – 2028.

5.2.2 Housing Delivery Action Plan 2022 – 2026

Housing for All required all local authorities to produce a Housing Delivery Action Plan for the period 2022 to 2026. This is a plan to set out the details of social and affordable housing delivery by local authorities.

South Dublin County Council have identified a delivery target further need for 3,671 social housing units, that comprises of 3,341 new build homes and 290 leased homes over the period of 2022 to 2026. The proposed development will contribute to the supply of social housing units required to meet the Housing for All and the Housing Delivery Action Plan objectives through collaboration with South Dublin County Council and the applicant, Dublin Simon Community.

6.0 PART V

This planning application for a proposed social housing development is being made by Dublin Simon Community, an Approved Housing Body (AHB) and charity. Thus, section 96 (13) does not apply in this case. The applicant has liaised with South Dublin County Council's Housing Department on this matter and a letter from South Dublin County Council's Housing Department accompanies this planning application.

7.0 ENVIRONMENTAL CONSIDERATIONS

An AA Screening Report has been prepared by *NM Ecology Ltd.* and is submitted in support of this planning application. This report has concluded that there is no risk of direct or indirect impacts on any European sites. Therefore, with regard to Article 42 (7) of the European Communities (Birds and Natural Habitats) Regulations 2011, it can be concluded on the basis of objective scientific information following screening, that the plan or project, individually or in combination with other plans or projects, will not have a significant effect on a European site. Therefore, an Appropriate Assessment is not required. For further information in this regard, please refer to the AA Screening Report which accompanies this application.

8.0 CONCLUSION

Downey, Chartered Town Planners, have prepared this Planning Statement, on behalf of the applicant, Dublin Simon Community, for a proposed social housing development comprising of 10 no. one bed units on lands at Old Nangor Road, Clondalkin, Dublin 22.

At this juncture, it must be stressed that Dublin Simon Community were in advanced stages of the construction tender process for implementing the 2017 social housing permission on the site including appointment of consultants, appointment of contractors, production of tender/construction drawings and completion of extensive site investigation work. However, due to unforeseen circumstances which occurred during the lifetime of the planning permission including the Covid-19 pandemic, supply chain issues, etc., Dublin Simon Community could not commence the development prior to its expiration. Thus, this new planning application essentially represents the resubmission of the previous planning permission granted on the site and incorporates much of the planning compliance submission matters of the 2017 planning permission and engineering matters which have since transpired following extensive site investigation work.

Dublin Simon Community, in conjunction with South Dublin County Council, have identified an urgent need to provide residential units for single users in the Local Authority's administrative area. The proposed development will assist in addressing this immediate need for social housing in the area.

The proposed development will provide for the renewal of the subject site by delivering a high-quality scheme that will integrate with the surrounding built environment. It is therefore submitted that the proposal accords with the relevant national, regional, and local plans, policies and guidelines, and Downey are of the considered opinion that the proposed development is in accordance with the proper planning and sustainable development of the area. In light of the above, Downey respectfully request that South Dublin County Council grant planning permission for the proposed development.