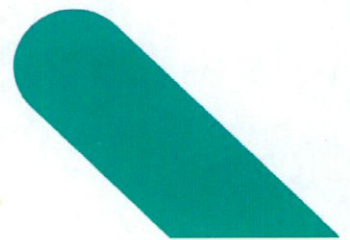
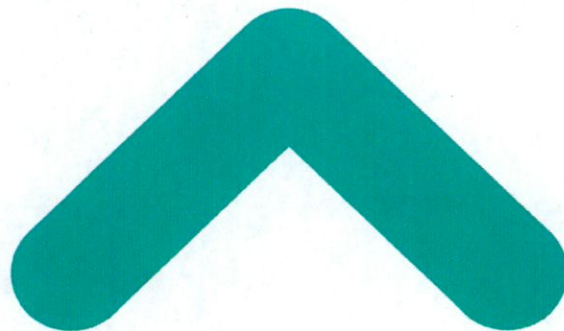


Planning Report

Pathway Homes Ltd.
Residential Development
at Knocklyon Road, Dublin
16.





DOCUMENT DETAILS

Client: **Pathway Homes Ltd**

Project Title: **Pathway Homes Ltd. Residential Development at Knocklyon Road, Dublin 16.**

Project Number: **210902**

Document Title: **Planning Report**

Document File Name: **210902 PR - F- 2022.11.17**

Prepared By: **MKO
Tuam Road
Galway
Ireland
H91 VW84**



Rev	Status	Date	Author(s)	Approved By
01	Draft	17/10/22	IOBM	MK
02	Draft	16/11/22	IOBM	MK
03	Final	17/11/22	IOBM	MK

Table of Contents

1.	INTRODUCTION.....	3
1.1	Preamble.....	3
1.2	Development Description.....	3
1.3	Project Team.....	3
2.	SUBJECT SITE.....	4
2.1	Site Description.....	4
2.2	Site Location.....	5
3.	PLANNING HISTORY.....	7
3.1	Applications of the Subject Site.....	7
3.2	Relevant Applications in the Sites Vicinity.....	7
4.	PROPOSED DEVELOPMENT.....	10
4.1	Description of Proposed Development.....	10
4.2	Key Planning Statistics.....	12
5.	PLANNING POLICY CONTEXT.....	14
5.1	National Planning Policy Context.....	14
5.1.1	National Planning Framework – Project Ireland 2040.....	14
5.1.2	Planning Policy Statement 2015.....	15
5.1.3	Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities (2009).....	15
5.1.4	Urban Development and Building Heights Guidelines for Planning Authorities (December 2018).....	16
5.1.5	Design Manual for Urban Roads and Streets.....	17
5.2	Regional Planning Policy Context.....	18
5.2.1	Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031.....	18
5.2.2	Dublin Metropolitan Area Strategic Plan.....	18
5.2.3	Transport Strategy for the Greater Dublin Area 2022- 2042.....	19
5.3	Local Planning Policy Context.....	20
5.3.1	South Dublin County Development Plan 2022-2028.....	20
5.3.1.1	Chapter 2: Core Strategy.....	20
5.3.1.2	Chapter 3: Nature, Cultural and Built Heritage.....	22
5.3.1.3	Chapter 4: Green Infrastructure.....	23
5.3.1.4	Chapter 5: Quality Design and Healthy Placemaking.....	24
5.3.1.5	Chapter 6: Housing.....	25
5.3.1.6	Chapter 7: Sustainable Movement.....	26
5.3.1.7	Chapter 12: Implementation and Monitoring.....	27
6.	PLANNING ASSESSMENT.....	30
6.1	Principle of the Development.....	30
6.1.1	National and Regional Policy.....	30
6.1.2	Core Strategy.....	31
6.1.3	Zoning.....	31
6.2	Design.....	31
6.2.1	Design Statement.....	33
6.2.2	Open Space.....	33
6.2.2.1	Private open space.....	34
6.2.3	Density and height.....	34
6.2.4	Daylight and Overshadowing.....	34
6.2.5	Car Parking.....	35



6.2.6	Public Transport Provision.....	36
6.2.7	Cycling and Active Transport	36
6.2.8	Road Safety.....	38
6.3	Civil Engineering.....	38
6.3.1	Foul and Surface Water.....	38
6.3.2	Flood Risk Assessment	38
6.4	Archaeological Assessment.....	39
6.5	Environmental & Biodiversity.....	39
6.5.1	Ecological Appraisal.....	39
6.5.2	Appropriate Assessment Screening Report	40
7.	CONCLUSION	41

TABLE OF TABLES

<i>Table 1 - Facilities and services surrounding the subject site.....</i>	<i>6</i>
<i>Table 2 - Relevant Planning Applications in the Sites Vicinity.....</i>	<i>7</i>
<i>Table 3 - Key Planning Statistics.....</i>	<i>12</i>
<i>Table 4 - Population Projections.....</i>	<i>21</i>
<i>Table 5 - Cycle Routes planned for development in the sites vicinity.....</i>	<i>27</i>
<i>Table 6 - Private open space allocation.....</i>	<i>29</i>
<i>Table 7 - Residential Car Parking Allocation</i>	<i>35</i>

TABLE OF FIGURES

<i>Figure 1 - Site location.....</i>	<i>4</i>
<i>Figure 2 - Zoning of proposed development site.....</i>	<i>4</i>
<i>Figure 3 - Subject site detailed services and facilities map.....</i>	<i>5</i>
<i>Figure 4 - Proposed Site Layout.....</i>	<i>10</i>
<i>Figure 5 - Proposed Elevations.....</i>	<i>11</i>
<i>Figure 6 - 3D visualisation of proposed development.....</i>	<i>11</i>
<i>Figure 7 - 3D visualisation of proposed development 2.....</i>	<i>12</i>
<i>Figure 8 - Revised BusConnects Route map in the Sites Vicinity.....</i>	<i>20</i>
<i>Figure 9 - Existing Cycling infrastructure.....</i>	<i>37</i>
<i>Figure 10 - Proposed Cycling Infrastructure.....</i>	<i>37</i>

1. INTRODUCTION

1.1 Preamble

This Planning Report is intended to give context and background to the proposed development at Knocklyon Road, Knocklyon, Dublin 16, and to demonstrate the proposed developments compliance with the current South Dublin County Development Plan 2022-2028, as well as National Policy and Guidelines. Providing a justified understanding and reasoning behind the proposed development shall assist the Planning Authority in their assessment of the planning application.

1.2 Development Description

The proposed development as set out in the public notices is as follows:

'The provision of 4 no. 5 bedroom semi-detached 2.5 storey houses semi-detached houses and associated car parking; private open space, site landscaping, connection to existing services as well as the provision of vehicular access from Knocklyon Road and all associated site development works.'

1.3 Project Team

The Project Team is as follows:

- Pathway Homes Ltd (Applicant)
- McCarthy Keville O'Sullivan Planning (MKO),
- Vincent Hannon Architects (VHA)
- Jennings O'Donovan (Consultant Engineers)
- ORS Civil and Structural Engineers (Road Safety Audit)
- H3D (Daylight, Sunlight and Overshadowing Analysis)
- Fado Archaeology (Archaeological Impact Assessment)
- Charles McCorkell Arboricultural Consultant (Tree Survey)
- Avrio (Environmental Consultants)

2. SUBJECT SITE

2.1 Site Description

The subject site is located on the Knocklyon Road, Dublin 16. The site is 0.0843ha in size. It is bounded to the north and east by existing residential development and to the south by the Knocklyon Road. The subject site is zoned 'Existing Res' under the current South Dublin County Council Development Plan 2022-2028 (Figure 2).

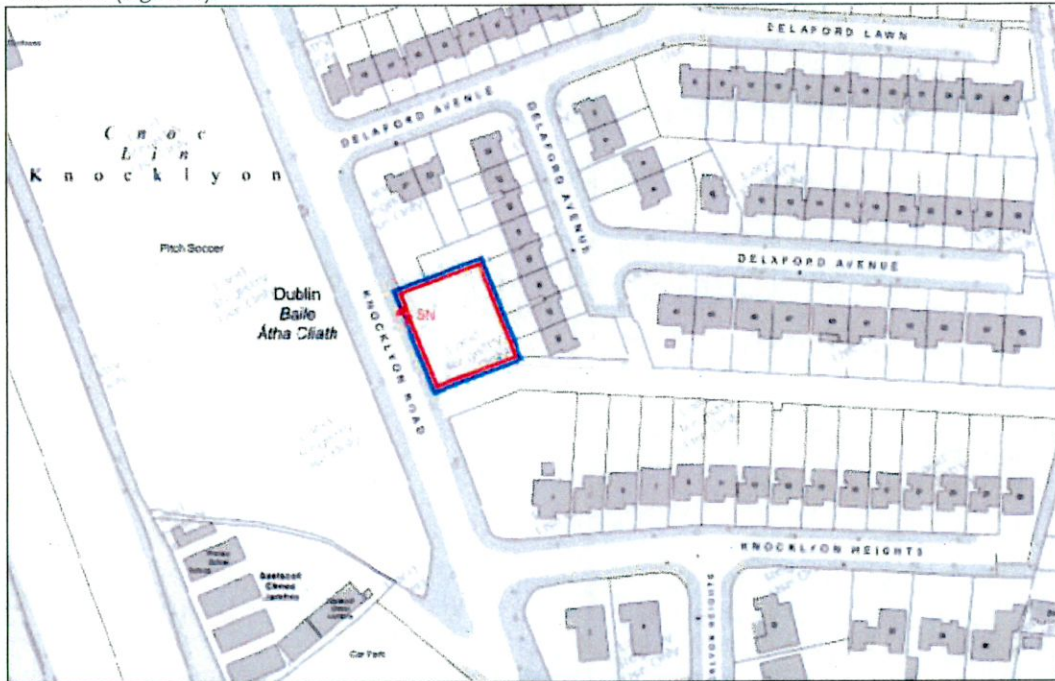


Figure 1 - Site location



Figure 2 - Subject Site Zoning: Existing Res.

The zoning objective of ‘Existing Res’ is ‘to protect and/or improve residential amenity’ with residential land use being permitted in principle as per Table 12.2 South County Dublin Development Plan 2022-2028). The site is located on the eastern side of the Knocklyon Road and is currently an undeveloped greenfield site. The subject site is primarily flat well-maintained grassland with trees to the side of the Knocklyon Road, a boundary wall to the south and hedgerows to the north and east creating a boundary line between the site and surrounding private residential garden space.

2.2 Site Location

The site is located on the Knocklyon Road, which falls within Dublin 16 allocating it to South Dublin County Council administrative area. The SD CDP 2022-2028 places the subject site in the eastern part of South Dublin County, part of Dublin City suburbs and the wider Metropolitan Area. The landscape character for this area is ‘Urban’ and has formed around existing natural features as an extension of Dublin City Centre. The area is predominantly residential, with numerous recreational, educational, and sports facilities in the locality. To the north of the site is the Dodder Valley Park, an area of public open space following the path of the Dodder River. The site is in close proximity to Tallaght and The Square Shopping Centre, Tallaght Football Stadium and the Red line Luas as well as a variety of restaurants, shops, amenities and services. Tallaght Hospital is located 4.5 km away. Knocklyon, c. 650m from the site is the closest built-up area with shops, schools, and a range of other facilities available. Similarly, Firhouse offers a selection of conveniences and services, located between the M50 and Tallaght located 1.5km from the subject site. Technological University Dublin Tallaght, one of five locations for the third level institute, is situated 5.2 km Northwest of the subject site as highlighted in Figure 3.

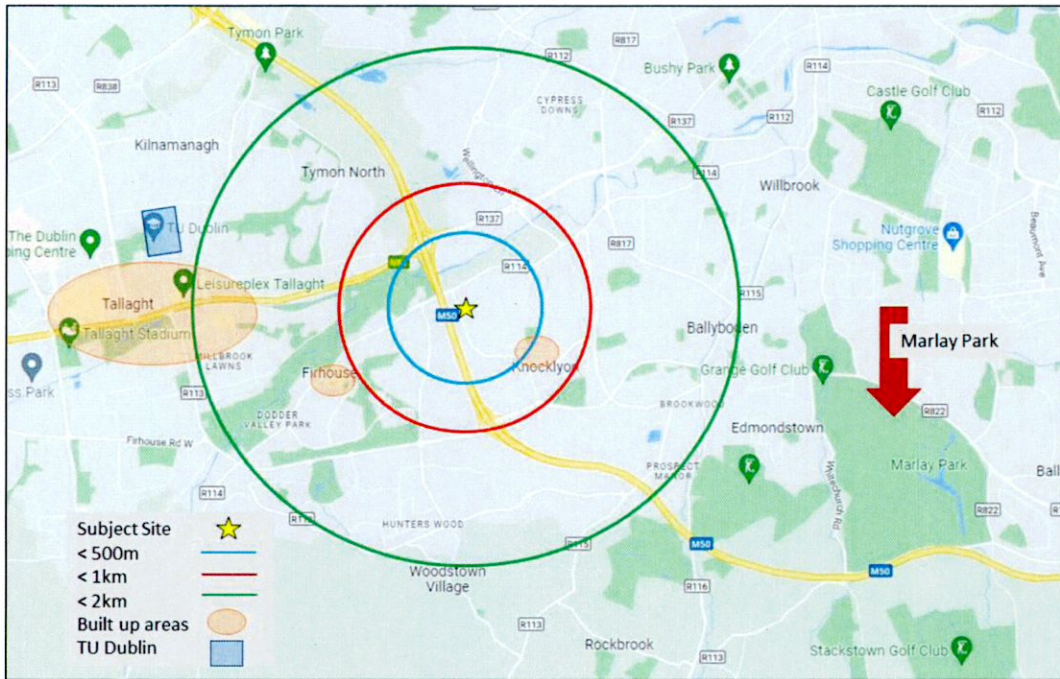


Figure 3 - Subject site detailed services and facilities map

Table 1 indicates distances to transport routes, schools and creches, sport and leisure facilities. The M50 is situated beside the site, a 2.5 km drive positions the driver on the Dublin motorway with connections to National Primary routes. The site is serviced by numerous bus routes, stop number 2547 on the Firhouse Road is reached by a 5-minute walk from the subject site. The stop is serviced by the 49, 65, 75 and 75A. There are a number of parks and open green space facilities in the locality including Marlay Park 3.6 km from the site and the Dodder Valley Park, 2.1 km from the site. Below, Table 1, also highlights the leisure and sports activities and clubs available in the area, such as Ballyboden St Enda’s GAA, Edmandstown golf club, Grange Golf Club, the National Basketball Arena and Tallaght Stadium, home of Shamrock Rovers football club.

Table 1 - Facilities and services surrounding the subject site.

Listed Amenities/services with corresponding distances from subject site				
	< 500 m	< 1km	< 2km	>2km
Bus Routes	5 min walk – 49, 65B, 75, 75A	6 min walk – 49, 65B, 75, 75A	14 min walk – 175 19 min walk – 15, 49, 75, 75A	
Luas stops				Kingswood, Tallaght, Belgard, Redcow, Kylemore
Creches	-Knocklyon Lodge: Creche & Montessori -Coolkidz		- Orlagh Park House Pre-School - Little Harvard Crèche & Montessori, Childcare in Scholarstown - Kids Inc - Creche & Montessori Rathfarnham - Chuckleberries Creche & Montessori Dalriada - Oakview Tallaght - Little Ladybird Creche, Montessori & Preschool	
Primary Schools	-Gaelscoil Chnoc Liamhna (Dublin)	- Scoil Treasa - Scoil Santain - St. Colmcille's Junior National School	- Holy Rosary Primary School - Firhouse Educate Together National School - Scoil Naomh Padraig - Bishop Shanahan National School - St. Dominic's National School	
Secondary Schools		- Tallaght Community School - St. Mac Dara's Community College	- Firhouse Educate Together Secondary School - Sancta Maria College - Christian Brothers Secondary School - Coláiste Éanna - Coláiste de hÍde	
Sport & Leisure Facilities	- Ballyboden St Enda's Gaa	- National Basketball Arena		- Edmondstown Golf Club - Rathfarnham Golf Club - Castle Golf Club - Thomas Davis GAA Club - St. Anne's GAA Club - Tallaght Stadium

3. PLANNING HISTORY

3.1 Applications of the Subject Site

The subject site has no planning history.

3.2 Relevant Applications in the Sites Vicinity

The construction of Gaelscoil Chnoc Liamhna is ongoing currently at the Knocklyon Road. The site of Gaelscoil Chnoc Liamhna is to the west of the subject site, between the M50 motorway and Knocklyon Road. The development description (ref. SD18A/0372) for the school is detailed below in *Table 2*. When finished, the school will be comprised of 3 floors, 16 no. classrooms and associated staff and student facilities. The scale of the building will be significant to the street with a total height of 11.8m and a total floor area of 2833.71m². The site of the school development had previously been a green space, football field for Knocklyon United FC. This large development will increase car traffic and pedestrian footfall on the road but also create opportunities to enhance public transport and active travel to the Knocklyon Road.

Table 2 - Relevant Planning Applications in the Sites Vicinity

Planning Reference	Applicant	Development Description	Decision
S01A/0278	P & C Tobin	To erect 3 no. bedroom farm-hand's lodge.	Incomplete Application
SD06A/0474	Gerardine O'Neill	Two storey dwelling house with attic bedroom and dormer to rear and roof light in southwest side, new vehicular entrance to front.	GRANT PERMISSION 05 Oct 2006
SD04A/0862	Paul & Mary Joyce	(a) Demolition of existing 2 storey dwelling and ancillary outbuildings, (b) Construction of 5 no. 2 storey town houses instead of 6, (c) Construction of 3 storeys apartment block excluding basement, consisting of 16 apartments instead of 21, with balconies to the front and rear, comprising of: no basement, 2 no. 1 bed, 4 no. 2 bed apartments on ground floor, 2 no. 1 bed, 4 no. 2 bed apartments on first floor, 4 no. 2 bed apartments on second floor, 34 surface car parking spaces instead of 19 spaces, bicycle parking, bin storage, landscaping, planting, front boundary wall with railing, relocation of the new entrance and associated site development works.	REFUSE PERMISSION 13 May 2005
SD14A/0112 PL06S.243729	Brian McGinn	Two storey detached house to side of existing house together with new entrance and associated site works.	REFUSE PERMISSION 18 Jul 2014 <u>ABP Decision:</u>

			Grant Permission 22 Jul 2014
SD15A/0336 PL06S.246101	Fitzwilliam Real Estate	Residential development consisting of 72 dwelling units including vehicular access from Firhouse Road, all associated site and infrastructural works including foul and surface water drainage, 106 car parking spaces, landscaping and public open space, boundary walls and fences, roads, cycle paths and footpaths all on a site area of approximately 2.3 hectares.	REFUSE PERMISSION 06 Jan 2016 <u>ABP Decision:</u> Refuse Permission 02 Jun 2016
SD188/0002	South Dublin County Council	Rapid Build Social Housing Development consisting of 16 housing units on undeveloped lands on site located on Old Knocklyon Road [Homeville end], and bounded by Firhouse Road, and the M50 motorway, (site opposite Homeville Court), at Firhouse, Dublin 16. In accordance with the requirements of the above, notice is hereby given that South Dublin County Council proposes: 2 no. 3 bedroom/5 person units - 2 storey; 5 no. 3 bedroom/5 person units - 2 storey; 9 no. 2 bedroom/3 person units - 3 storey Apartment Unit. The works include: New access off Old Knocklyon Road, landscaping works to boundaries and new park/play area, ancillary works to landscape housing areas, and all necessary associated ancillary works on the site and adjacent areas. All units to be minimum A2 BER rated. The housing provision includes two / three storey units grouped in terraces.	PART 8 APPROVED BY COUNCIL 10 Sep 2018
SD18A/0372	Minister for Education & Skills	(a) 3 storey permanent primary school building containing 16 en-suite classrooms, 1 general purpose room, 1 library/resource room, 1 multi-purpose room, 3 special education tuition rooms, all associated staff and pupil ancillary accommodation/facilities, roof garden, PV solar panels on the south facing pitched roofs and external building signage; (b) 2 ball courts with associated perimeter fencing; (c) junior play areas; (d) car parking for staff and visitors; (e) formation of a drop off bay for 10 cars, relocation of pedestrian	GRANT PERMISSION 21 Jan 2019

		crossing and provision for new pedestrian crossing, all on the Knocklyon Road; (f) realignment of access road and junction from Knocklyon Road including provision for new and realigned footpaths including shared cycle/pedestrian paths to both north and south of the junction; (g) all associated site works including boundary walls/fencing with signage, entrance gates, connection to public storm drainage via an attenuation system, connection to public foul drainage at Delaford Ave, public lighting, bike shelter, landscaping and temporary site compound.	
SD21A/0054	Deborah Soave	A two storey, detached house to side of existing house with new vehicular access and all associated site works.	DECLARED WITHDRAWN 15 Feb 2022
SD22A/0287	Deborah Soave	The development shall consist of two storey detached house to side of existing house with vehicular access and all associated site works.	REQUEST ADDITIONAL INFORMATION 22 Aug 2022

4. PROPOSED DEVELOPMENT

4.1 Description of Proposed Development

The proposed development consists of 4 no. 2.5 storey semi – detached houses. The houses are accessed by 2 no. proposed new entrances on Knocklyon Road. The proposed site layout is indicated in drawing no. 180201-3-102, provided by VHA, in *Figure 4* below. The proposed houses are almost uniform in style subject to minor differences in detail. The houses are 5-bedroom residences with a maximum height of 10.395m. The units share boundaries with the surrounding residential dwellings to the rear (northeast), Unit 1 shares a boundary to the north of the site and Unit 4 is enclosed to the south by a pedestrian walkway. Drawing no. 180201-3-103 enclosed details boundary treatments proposed while drawing no. 180201-03-200 of the proposed development illustrates the proposed elevations. A design and access statement has been prepared by Vincent Hannon Architects and is enclosed with this application. This statement sets out the design rationale and design principles of the proposed development. 3D imagery (*Figure 6* and *Figure 7*) of the proposed development displays a visualisation of the units, which include white smooth render with sections of brick and natural slate roof.



Figure 4 - Proposed Site Layout



Figure 5 - Proposed Elevations



Figure 6 - 3D visualisation of proposed development



Figure 7 - 3D visualisation of proposed development 2

4.2

Key Planning Statistics

The following table provides an overview of key planning statistics for the proposed development.

Table 3 - Key Planning Statistics

Planning Statistics	Proposed Development	National Policy Standards	Local Policy Standards
Overall Site Area (in hectares)	0.0843 ha	N/A	N/A
Total Floor Area of Residential Units	167 sq m Total of 4 units combined 668 sq m	120 sq m (Quality Housing for Sustainable Communities)	N/A
	47 units per hectare	The Sustainable Residential Development in Urban Areas identifies urban and suburban sites and locations of increased density	40 – 50 units per hectare (Table 11, Section 2.6.5, SD CDP 2022-2028) Further guidance on density and setting provided in Building Height and Density Guide, Appendix 10, SD CDP 2022-2028.
Height (Per unit)	2.5 storeys (10.395 m)	Up to 4 storeys Urban Development and Building Heights' (2018)	In line with prevailing height
Private Open Space	Unit 1 – 71.4 sq m	All housing units should have an area of open space to	70 sq m

Planning Statistics	Proposed Development	National Policy Standards	Local Policy Standards
	Unit 2 – 71 sq m Unit 3 – 70 sq m Unit 4 – 71 sq m	separate the dwelling from the surrounding buildings, this is influenced by plot width and distance between dwellings.	
Car Parking	1 parking spaces per unit Total no. spaces: 4	National Policy Objective 13: In suburban areas the inclusion of planning and related standards, including and 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.	Within Zone 2, 3 bed+ allocated maximum 1.5 spaces per unit

5. PLANNING POLICY CONTEXT

The planning policy document currently in place for the subject site is the South Dublin County Council Development Plan 2022 – 2028. In a policy context the area of Knocklyon, encompassing the subject site, is contained within the Level 1 settlement typology of Dublin City and Suburbs within Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031. The description states this is the *‘International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.’* The relevant policies and objectives of these documents is laid out within this section, the documents of relevance are as follows:

- National Planning Framework 2040
- Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities (2009)
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Design Manual for Urban Roads and Streets
- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031
- Dublin Metropolitan Area Strategic Plan
- Transport Strategy for the Greater Dublin Area 2016-2035
- Draft Transport Strategy for the Greater Dublin Area 2022- 2042
- South Dublin County Council Development Plan 2022 – 2028

5.1 National Planning Policy Context

5.1.1 National Planning Framework – Project Ireland 2040

The Department of Housing, Planning, Community and Local Government recently published the National Planning Framework (NPF) entitled ‘Ireland 2040’ to succeed the NSS. The NPF comprises the Government’s proposed long-term strategic planning framework to guide national, regional, and local planning and investment decisions over the next 25 years. The NPF is a high-level document which provides a framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy, and communications, into an overall coherent strategy. The NPF has a number of direct national policy objectives that articulate delivering on a compact urban growth programme. These include:

- NPO 5: describes the sufficient scale and quality of urban development.
- NPO 6: relates to increased residential population and employment in urban areas.
- NPO 13 identifies building height as an important measure for urban areas specifying that car parking standards will be based on performance criteria of the design and quality of a proposed scheme.
- NPO 32: To target the delivery of 550,000 additional households to 2040.
- NPO 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- NPO 68: Metropolitan Area Strategic Plans (MASPs) may enable up to 20% of the phased population growth targeted in the principal City and Suburban area, to be accommodated in the wider Metropolitan Area i.e. outside the city and suburbs, in addition to growth identified for the Metropolitan area. The NPF states that this should be subject to any relocated growth being in the form of compact development, such as infill or a sustainable urban extension and/or being served by high-capacity public transport and/or related to significant employment provision.

5.1.2 Planning Policy Statement 2015

The Department of Environment, Community and Local Government's (DECLG) Planning Policy Statement 2015 encourages Planning Authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development actually comes into use in accordance with Development Plan policy and in tandem with supporting infrastructure.

The policy statement acknowledges that creating a consolidated urban form fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure.

5.1.3 Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities (2009)

The 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009) set out the criteria on planning for sustainable neighbourhoods under four main themes, namely, provision of community facilities, efficient use of resources, amenity or quality of life issues and conservation of the built and natural environment.

The Guidelines advocating an urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods. A varied typology of residential units is promoted within neighbourhoods in order to encourage a diverse choice of housing options in terms of tenure, unit size, building design and to ensure demographic balance in residential communities.

The guidelines reinforce the need to carefully select appropriate locations for higher density residential development:

- *"The sequential approach as set out in the Department's Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities".*

Further the promotion of infill sites will contribute to sustainable development, including other benefits:

- *'The increase of population within city or town centres with their range of employment, recreation, educational, commercial and retail uses can help to curtail travel demand; therefore, these locations have the greatest potential for the creation of sustainable patterns of development. Increasing populations in these locations can assist in regeneration, make more intensive use of existing infrastructure, support local services and employment, encourage affordable housing provision and sustain alternative modes of travel such as walking, cycling and public transport. While a mix of residential and other uses will often be desirable in city and town centres, particular care is needed to ensure that residential amenity is protected. The infilling of "gap" sites will also contribute to the improvement of the architectural form.'*

These infill sites must also uphold and maintain the character of the area and design of the surrounding residential units:

- *'In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. The design approach should be*

based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc. Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands.'

5.1.4 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The Urban Development and Building Heights Guidelines for Planning Authorities (2018) were published by the Minister under Section 28 of the Planning and Development Act 2000 (as amended) and set out national policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

Section 1.7 of these guidelines outline that *'traditional building heights in most urban areas in Ireland vary somewhat within a limited and generally low-rise range. This range goes from two storeys in many suburban locations, frequently in the form of housing estates, moving towards building heights of three, four or more storeys in more central urban areas, but generally not more than 6-8 storeys in the central urban areas of the cities and larger towns'*

Section 1.9 of these guidelines set out that on *'reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban area ... Therefore, these guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels'*

Section 1.16 of these guidelines set out that *'The first of the 10 National Strategic Outcomes in the National Planning Framework that the Government is seeking to secure relates to compact urban growth, with the associated objective that at least half of the future housing growth of the main cities will be delivered within their existing built-up areas through infill and brownfield development and 30% in other key towns. The Government is determined to ensure that the realisation of this objective is a shared priority across Government, the wider public sector and through private investment and it will therefore be a key driver for investment and policy delivery at national, regional and local levels.'*

Section 1.17 of the guidelines set out that *'Securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities.'*

Section 3.2 of the guidelines relating to the development management criteria includes that applicants shall demonstrate that the proposed development satisfies criteria at various scales, which include:

- **At the scale of the relevant city/town**
 - The site should be well served by public transport with high capacity, frequent service and good links to other modes of transport.
 - Proposed development should include increased building heights and should integrate into and enhance the character of the surrounding area.
 - Proposed development should make a positive contribution to place-making and achieve appropriate massing, height and densities, responding to the scale of adjoining developments
- **At the scale of district/neighbourhood/street**

- The proposed development should respond well to the natural and built environment surrounding and make a positive contribution to the urban neighbourhood and streetscape.
 - The proposed development should not be monolithic with long, uninterrupted walls of building.
 - The proposed development 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 positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.
- **At the scale of the site/building**
 - The form, massing and height of the proposed development should be carefully designed to ensure maximisation of natural daylight, ventilation and views, and minimisation of loss of light or overshadowing.
 - Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision, with clear rationale and justification for where it is not possible to meet the requirements in their entirety.

Section 3.4 of the guidelines which relates to building height in suburban/edge locations states that locations such as this *‘typically now include townhouses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1- and 2-bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more-bedroom homes across a variety of building typology and tenure options’*

Specific Planning Policy Requirement (SPPR) 4: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;
- a greater mix of building heights and typologies in planning for the future development of suburban locations; and
- avoid monotype building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

5.1.5 Design Manual for Urban Roads and Streets

Design Manual for Urban Roads and Streets (DMURS) was published by the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government in April 2013. DMURS provides guidance relating to the design of urban roads and streets. DMURS encourages designers to give due consideration to creating a ‘sense of place’ which is of core significance to the creation of safe and more integrated street designs. The guidance document notes that four interlinked characteristics influence the sense of place within a street, including:

- **Connectivity:** The creation of vibrant and active places requires pedestrian activity. This in turn requires walkable street networks that can be easily navigated and are well connected.
- **Enclosure:** A sense of enclosure spatially defines streets and creates a more intimate and supervised environment. A sense of enclosure is achieved by orientating buildings toward the street and placing them along its edge. The use of street trees can also enhance the feeling of enclosure.

- **Active Edge:** An active frontage enlivens the edge of the street creating a more interesting and engaging environment. An active frontage is achieved with frequent entrances and openings that ensure the street is overlooked and generate pedestrian activity as people come and go from buildings.
- **Pedestrian Activity/Facilities:** The sense of intimacy, interest and overlooking that is created by a street that is enclosed and lined with active frontages enhances a pedestrian's feeling of security and well-being. Good pedestrian facilities (such as wide footpaths and well-designed crossings) also make walking a more convenient and pleasurable experience that will further encourage pedestrian activity.

The DMURS guidance emphasises that these four characteristics represent the basic measures that should be established to create people friendly streets that facilitate more sustainable neighbourhoods

5.2 Regional Planning Policy Context

5.2.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

The Eastern and Midland Regional Assembly adopted the Regional Spatial and Economic Strategy in 2019 (RSES). The RSES sets out a settlement hierarchy for the region and identifies key growth areas which will see significant development up to 2031 as well as population targets at the county level. A number of strategies and Regional Policy Objectives (RPOs) establish compliance with the NPF and set out how the region will develop over a 12-year timeframe.

RPO 4.3:

- *'Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.'*

The RSES also sets out the strategic planning and investment framework for the growth of the Dublin Metropolitan Area (MASP) which is an integrated land use and transportation strategy. It is a strategic planning document which sets out:

- A vision for the future growth of the Dublin Metropolitan Area, identifying strategic corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors.
- Large scale strategic residential, employment and regeneration development opportunities and infrastructure deficits or constraints that need to be addressed.
- A sequence of infrastructure priorities to promote greater co-ordination between Local Authorities, public transport and infrastructure providers for the phased delivery of sites

The subject site is located within the contiguous built environment of the Dublin Metropolitan Area.

5.2.2 Dublin Metropolitan Area Strategic Plan

The Dublin MASP supports National and Regional objectives and seeks to identify and support infrastructure investment and targeted growth within the Metropolitan Area.

Section 5.3 'Compact sustainable growth and accelerated housing delivery

- *'To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, 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.'*

These long-term goals are supported by the following policy objectives which align the MASP with all relevant national plans and guidelines:

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', 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities'.

5.2.3 **Transport Strategy for the Greater Dublin Area 2016-2035' and Draft Transport Strategy for the Greater Dublin Area 2022- 2042**

The National Transport Authority's (NTA) 'Transport Strategy for the Greater Dublin Area 2016-2035' provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area over the medium to long term. The draft Transport Strategy for the Greater Dublin Area 2022-2042 includes further enhancements for the Luas, with the capacity of the trams set to continue to increase well as further extensions of the Luas line. Future plans, for the years following 2042, propose a Luas line that would run from Dublin City Centre to Knocklyon and Tallaght.

A review of the Transport Strategy has been undertaken and has resulted in the Bus Services Network Redesign (published September 2020). The Revised BusConnects route map relevant to the proposed development is shown in *Figure 8* below. The bus schedules presented below, range in frequency but will provide the subject area with substantial connectivity to the County of Dublin when completed. The following BusConnects routes (F1, S6, S8, A1) are those within the closest proximity to the development site.

A1 to and from: Beaumont – City Centre – Knocklyon – Will run Monday to Friday from 5:00 to 23:00 every 12 to 30 minutes, Saturday from 6:00 to 23:00 every 15 to 20 minutes and Sunday from 8:00 to 23:00 every 20 to 30 minutes.

F1 to and from: Charlestown - Finglas Bypass - City Centre – Tallaght - Will run Monday to Friday from 5:00 to 23:00 every 15 to 30 minutes, Saturday from 6:00 to 23:00 every 15 to 20 minutes and Sunday from 8:00 to 23:00 every 20 to 30 minutes.

S6 to and from: Tallaght - Dundrum - UCD – Blackrock - Will run Monday to Friday from 5:00 to 23:00 every 10 to 30 minutes, Saturday from 6:00 to 23:00 every 15 to 20 minutes and Sunday from 8:00 to 23:00 every 20 to 30 minutes.

S8 to and from: Tallaght - Sandyford - Dún Laoghaire - Will run Monday to Friday from 6:00 to 23:00 every 15 to 30 minutes, Saturday from 6:00 to 23:00 every 30 minutes and Sunday from 8:00 to 23:00 every 30 minutes to 1 hour.

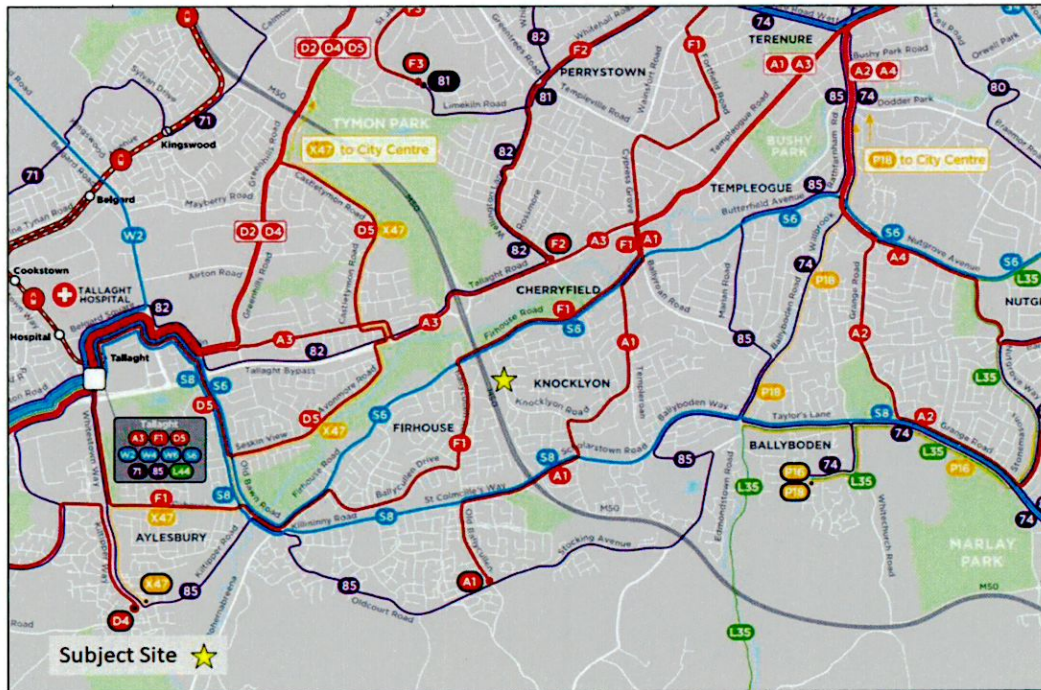


Figure 8 - Revised BusConnects Route map in the Sites Vicinity

5.3 Local Planning Policy Context

5.3.1 South Dublin County Development Plan 2022-2028

The South Dublin County Development Plan 2022-2028 (SD CDP) instructs and provides the guidance for the proper planning and sustainable development of the administrative area. The Development Plan guides growth and expansion to provide the highest quality environment and standard of living to the area, with sustainability, healthy placemaking and a growing economy at the centre of the plan. The SD CDP 2022-2028 is divided into 12 chapters, below are key policy and objectives set out in these chapters which are relevant to the proposed development.

The settlement hierarchy of the area as set out in the SD CDP 2022-2028, in line with the RSES describes the site as being in the *'international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. [the area] acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.'*

5.3.1.1 Chapter 2: Core Strategy

Housing for the projected population growth is a main aim within the core strategy. The SD CDP 2022-2028 relies on population projections to be able to account for the demand of the county. With these population projections estimations can be made for vital public services and facilities. These population projections are detailed in national and regional level policy and by the local authorities for their respective Development Plans:

'The RSES includes population figures for the Region, the parameters of which are set out under Appendix B of the EMRSES, which envisages South Dublin County to grow by an additional 50,233 persons from 2016 to 2031'

Population growth targets from the RSES are provided using historical data and projections including residential developments and various other factors set to influence the population growth in the future. The estimates for South County Dublin vary and are recalculated and adjusted for 'Additional Headroom' the results of these calculations are available in the Table 4 below.

Table 4 - Population Projections

South Dublin – Adjusted Population Projection 2016-2028			
Year	2016	2026 (Low to High)	2028 (Low to High)
South Dublin County Council	278,767	315,308 → 322,808	317,385 → 323,769
Change (No.) from 2016	-	+ 36,541 → 44,041	+ 38,618 → 45,002
Change (%) from 2016	-	+ 13.1% → 15.8%	+ 13.8 → 16.7%
Average Annual Pop growth	Ranging from +3654 to 4404 per year		Ranging from +3218 to 3877 per year

In the period of 2011 - 2016 the housing stock largely under-delivered in accommodating the growing population, with a growth of 13,562 people and only a 1,089 increase in housing stock. The NFP requires all local authority councils to provide a Housing Need Demand Assessment (HNDA), to get an overlook at the potential housing demand in each county in relation to the projected population and support the Housing Strategy. The Interim HNDA is available in Appendix 11 of the SD CDP 2022-2028, the assessment meticulously analyses past population statistics and data. The historical data is used and examined against future projections to determine the housing stock requirements as well as the type of housing unit required in the years to come.

The following sets out the Housing Strategy and Interim HNDA Policy Objectives, relevant to the proposed development, which are incorporated into the Development Plan.

Appendix 11, Section 9

Housing Strategy and Interim HNDA (HS) Policy 1: Overarching Policies and Objectives.

Implement the South Dublin County Council Housing Strategy and Interim HNDA Strategy 2022 – 2028.

HS1: Objective 1:

'To ensure adequate and appropriate land is zoned to facilitate and implement the aims of the Core Strategy, to deliver sustainable development, and to meet likely future housing need in the County as identified by the Housing Strategy and Interim HNDA.'

HS1: Objective 9:

'To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries, suited to their strategic regional role and subject to good design and development management standards begin met.'

HS1: Objective 15:

'To Ensure that proposals for residential development provide a minimum of 30% 3- bedroom units unless it can be demonstrated that:

- there are unique site constraints that would mitigate against 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 ten-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.'*

SD CDP 2022-2028 Core Strategy also sets out guidelines to support the growing population and meet the demand for housing, while also maintaining the quality and character of the county.

Policy CS3: Monitoring Population and Housing Growth

Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.

CS3 Objective 4:

- To maintain and further expand the database of greenfield, brownfield and infill sites as part of the active land management process.

Policy CS6: Settlement Strategy - Strategic Planning Principles

Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.

CS6 Objective 2:

- To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).

CS6 Objective 3:

- To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).

Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement

Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

CS7 Objective 3:

- To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).

5.3.1.2 Chapter 3: Nature, Cultural and Built Heritage

Policy NCBH20: Architectural Conservation Areas

Preserve and enhance the historic character and visual setting of Architectural Conservation Areas and carefully consider any proposals for development that would affect the special value of such areas.

NCBH20 Objective 3:

- To ensure that new development, including infill development, extensions and renovation works within or adjacent to an Architectural Conservation Area (ACA) preserves or enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.

Policy NCBH21: Vernacular / Traditional and Older Buildings, Estates and Streetscapes

Ensure appropriate design of new-build elements and interventions in historic buildings and environments.

NCBH21 Objective 4:

- To ensure that infill development is sympathetic to the architectural interest, character and visual amenity of the area.

Policy NCBH23: Architectural Conservation and Design

Encourage appropriate design of new-build elements and interventions in historic buildings and environments.

NCBH23 Objective 3:

- To support the development of sustainable back land and infill development that is appropriate in scale and character to historic town and village centres, that transitions appropriately,

accommodates surviving structures, where appropriate, and retains the historic streetscape form particularly within sensitive areas of architectural importance.

Policy NCBH25: Placemaking and the Historic Built Environment

Ensure that historic buildings and built environments are sensitively incorporated within development and regeneration schemes, taking advantage of their intrinsic attributes including character, visual amenity, sense of identity and place.

NCBH25 Objective 3:

- *To support the development of sustainable back land and infill development that is appropriate in scale and character to historic town and village centres, that transitions properly, that accommodates surviving structures where practical and that retains the historic streetscape form particularly within sensitive areas of architectural importance.*

5.3.1.3 Chapter 4: Green Infrastructure

Chapter 4 on Green Infrastructure (GI) is concerned with the mitigation of and adaptation to evolving climate change impacts. One such way of doing so is to include GI in development plans, this chapter informed by the **NPO 58, 59, 60, 62** and **RSO 10, 7.12, 7.16, 7.17**.

The overarching policy within this chapter is to:

‘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.’

GI1 Objective 2:

- *To implement and monitor the South Dublin County GI Strategy during the lifetime of this plan and develop a fit for purpose GI scoring for the County which will support ongoing identification, protection, enhancement and management of GI in the County and which will enable the assessment and monitoring of GI interventions in the County.*

GI1 Objective 3:

- *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.*

GI1 Objective 4:

- *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*

Policy GI3: Sustainable Water Management

GI3 Objective 1:

- *To ensure that hydromorphic assessments are undertaken where proposed development is within lands which are partially or wholly within the Riparian Corridors identified as part of this Development Plan.*

Policy GI4: Sustainable Drainage Systems (SuDS)

Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.

GI4 Objective 1:

- *To limit surface water run-off from new developments through the use of Sustainable Drainage Systems (SuDS) using surface water and nature-based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Explanatory Design and Evaluation Guide, 2022.*

GI4 Objective 2:

- *To incorporate a SuDS management train during the design stage whereby surface water is managed locally in small sub-catchments rather than being conveyed to and managed in large systems further down the catchment.*

Policy GI5: Climate Resilience

Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.

GI5 Objective 3: *To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.*

- *Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.*
- *Identify suitable sites for new urban trees including Miyawaki style mini woodlands, where feasible.*
- *Support the implementation of a co-ordinated regional approach to the maintenance of trees and support the work of the Regional Steering Group on Tree Management to which South Dublin County Council is a participant.*
- *Promote the establishment of tree trails in public parks across the County.*
- *Promote the planting of new woodlands and forestry within appropriate open space and park locations within the County.*
- *To plant "pocket forests" in tracts of open grassland to act as an oasis for biodiversity.*
- *To recognise the value of mature trees in terms of carbon sequestration and amenity over saplings.*

GI5 Objective 4:

- *To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).*

5.3.1.4 Chapter 5: Quality Design and Healthy Placemaking

Chapter 5 is informed by the following National and Regional policy objectives: **NPO 4**, **NPO 13**, and **RPO 9.10**.

Policy QDP1: Successful and Sustainable Neighbourhoods

Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.

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.'

Policy QDP3: Neighbourhood Context

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

QDP3 Objective 6:

- *To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.*

Policy QDP7: High Quality Design Development General

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

QDP7 Objective 1

- *To actively promote high quality design through the policies and objectives which form 'The Plan Approach' to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County's Building Height and Density Guide.*

Policy QDP8: High Quality Design - Building Height and Density Guide (BHDG)

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: High Quality Design - Building Height and Density

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

QDP9 Objective 1:

- *To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.*

Policy QDP10: Mix of Dwelling Types

Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.

QDP10 Objective 1:

- *To ensure that all new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.*

5.3.1.5 Chapter 6: Housing

National Strategic Outcome 1 of the NPF seeks to carefully manage the sustainable growth of compact cities, towns and villages rather than continuing the sprawl of urban development as a top national priority through the NPO 1, 28, 32, 33, 34 and RPO 9.1, 9.2, 9.4, 9.12.

Policy H2: Supply of Housing

Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.

H2 Objective 3:

- *To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County, working towards an even spread of such schemes across all LEAs, whilst ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates, subject to the protection of residential amenity.*

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.

H7 Objective 1:

- *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), or as may be updated and Chapter 12: Implementation and Monitoring.*

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.

H8 Objective 3:

- *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.*

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.

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.*

5.3.1.6 Chapter 7: Sustainable Movement

Chapter 7 of the SD CDP, Sustainable Movement, is informed by the following national and regional objectives: **NSO 4, NPO 64, RSES CH5, RPO 5.3**, along with the NTAs Strategy for the GDA, Climate Action Plan, Design Manual for Urban Roads and Streets and National Cycle Manual (2011). Within this chapter a series of cycling routes are laid out with a general time frame of 'now', 'soon' or 'later'. Those

most relevant to the proposed development site are presented in Table 5 below. These developments are also in line with **SM2 Objective 3**, further acknowledged below with other relevant Policies and Objectives in this chapter.

Table 5 - Cycle Routes planned for development in the sites vicinity

Now	Soon
Tallaght Village to Dodder Valley	Greenhills Road to Dodder Valley
Dodder Greenway (A) Dodder Greenway Bridges (B) to (F) Dodder Greenway Links	
Firhouse to Knocklyon	

Policy SM1: Overarching Transport and Movement

Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.

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 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.*

Policy SM3: Public Transport – General

Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.

Policy SM6: Traffic and Transport Management

Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.

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.*

5.3.1.7 Chapter 12: Implementation and Monitoring

Mix of Dwelling Types

- *The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality*
- *Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions.*

Environmental Impact Assessment

'Environmental Impact Assessment (EIA) is a key instrument of EU environmental policy. The primary purpose of the EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU) is to ensure that public and private projects, which are likely to have significant effects on the environment are granted permission only after an assessment of the likely significant environmental effects of those projects has been carried out. Potential concerns over proximity to River Dodder, although there is already a significant housing development surrounding the site.'

Landscape Character Assessment.

- *Divided into Landscape Character Areas and Landscape Character Types and within these there is varied possibility of the location to absorb new developments, the type of development can also create variabilities. Site may be subject to a Landscape Impact Assessment*

Green Space Factor

- *Applications must demonstrate a contribution towards 'protection or enhancement of Green Infrastructure' within application submissions via a Green Infrastructure Plan. Example given: 'In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone*

Green Space Factor (GSF)

- *The GSF is a score-based requirement that establishes minimum standards for landscaping and GI provision in new developments. Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Qualifying developments are required to reach the minimum Green Space Factor (GSF) score established by their land use zoning.*

If minimum score is not obtained, council will engage to discuss alternative solutions for the development's green infrastructure.

Floor to Ceiling Height

- *In line with SPPR 5 of the Apartment Guidelines, ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.*

Mid of Dwelling Types

- *On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality*

To demonstrate compliance with the housing and apartment standards set out below, all planning applications shall be accompanied by a Schedule of Accommodation and Housing Quality Assessment document in line with Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments, (2020).

Table 6 - Private open space allocation

Unit type	House size	Private open space
One bedroom	50 sq m	48 sq m
Two bedrooms	80 sq m	55 sq m
Three bedrooms	92 sq m	60 sq m
Four bedrooms or more	110 sq m	70 sq m

Development proposals for housing must be required to accord with or exceed the minimum private open space standards set out above in, *Table 5*. Generally, Private Open Space for housing should be located behind the front building line of the house and be designed to provide for adequate private amenity.

Residential Consolidation - Infill Sites

Development on infill sites should meet the following criteria:

- Be guided by the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual
- A site analysis that addresses the scale, siting and layout of new development taking account of the local context should accompany all proposals for infill development. On smaller sites of approximately 0.5 hectares or less a degree of integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes.
- Larger sites will have more flexibility to define an independent character.
- While the minimum standards set will be sought in relation to refurbishment schemes it is recognised that this may not achieve a positive planning outcome, particularly in relation to historic buildings, ‘living over the shop’ projects, and tight (less than 0.25 Hectares) urban centre infill developments. In order to allow for flexibility, the standards may be assessed on a case-by-case basis and if considered appropriate, reduced in part or a whole, subject to overall design quality in line with the guidelines
- Sustainable Urban Housing: Design Standards for New Apartments, 2020
- Significant site features, such as boundary treatments, pillars, gateways and vegetation should be retained, in so far as possible, but not to the detriment of providing an active interface with the street
- Where the proposed height is greater than that of the surrounding area a transition should be provided (See Chapter 5, Section 5.2.7 of this Chapter and Appendix 10: Building Height and Design Guide)
- Subject to appropriate safeguards to protect residential amenity, reduced public open space and car parking standards may be considered for infill development, dwelling sub-division, or where the development is intended for a specific group such as older people or students. Public open space provision will be examined in the context of the quality and quantum of private open space and the proximity of a public park. Courtyard type development for independent living in relation to housing for older people is promoted at appropriate locations. Car parking will be examined in the context of public transport provision and the proximity of services and facilities, such as shops
- Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure’s contribution to the visual setting or built heritage of the area
- All residential consolidation proposals shall be guided by the quantitative performance approaches and recommendations under the ‘Site Layout Planning for Daylight and Sunlight’

(2nd edition): A Guidelines to Good Practice (BRE 2011) and BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ and / or any updated guidance

- It should be ensured that residential amenity is not adversely impacted as a result of the proposed development
- Delivery of Public Open Space and Contribution in Lieu shall be in accordance with the provisions set out under Section 8.7.4 of Chapter 8: Community Infrastructure and Open Space.

6. PLANNING ASSESSMENT

Having reviewed national, regional, and local policy in the context of the proposed development, we consider that the key issues relating to the proposed development are:

- Principle of the Development
 - Compliance with National and Regional Policy
 - Compliance with Core strategy
 - Compliance with Zoning Objectives
- Design:
 - Design Statement
 - Open Space
 - Density and Height
 - Daylight and Overshadowing
 - Car Parking
 - Public Transport
 - Cycling and Active Transport
 - Road Safety
- Civil Engineering Services
- Archaeological Assessment
- Environment & Biodiversity

The following section sets out compliance of the proposed development with the policies, objectives and regulations set out in Section 6 and throughout this planning report.

6.1 Principle of the Development

The following section sets out the proposed developments compliance with National and Regional policies, attention is given to the standards and objectives set out in Chapter 12 of SD CDP 2022-2028.

6.1.1 National and Regional Policy

The proposed development supports the National and Regional policy objectives of Compact urban growth. The NPF sets out Compact Growth as a National Strategic Outcome 1, encouraging sustainable development within existing settlements to accommodate the growing population through controlled densification and consolidation. As the proposed development is located on a previously undeveloped grassland site in a prime residential location, it thus aids the target of accommodating 40% of future housing developments within existing built-up areas. Directly supporting **NPO 3a**, and **NPO 3b**.

NPO3a ‘Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements’

NPO3b ‘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’

The proposed infill development is located in close proximity to multiple public transport routes, schools, employment opportunities, sports facilities and recreational amenities. The RSES MASP highlights these factors as being an appropriate location for compact development, such as this proposed infill development. The proposed infill development also directly supports **RPO 4.3**, **RPO 5.3**, and **RPO 5.4** as quoted above in Section 5.2.

6.1.2 Core Strategy

The SD CDP 2022-2028 sets out within the core statement to provide and facilitate sustainable development of the county. Infill development is considered one of the ways to achieve sustainable development while being able to provide for the growing population and demand for housing. This is set out in the NPF as a clear focus for cities and towns, and is instilled within other national, regional, and local policy documents, which are laid out above. The proposed development remains consistent with this focus by utilising an infill site for compact growth while in keeping with the character of the Knocklyon Road.

The proposed development will consist of 4 no. 2.5 storey 5 no. bedroom residential units with 1 no. car parking spaces per unit. Providing compact development within the footprint of an existing settlement to aid in the supply of housing stock to provide for the projected annual population growth of between 3654 to 4404 from the years 2016 -2026. The proposed development will contribute towards meeting the new dwellings target provided for in the housing allocation in line with

Policy CS3: Monitoring Population and Housing Growth

- *'Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County'*

The subject site is located within the geographic boundary of Dublin City and Suburbs, supporting

Policy CS6 Objective 2:


- *'To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2)'*




6.1.3 Zoning

The subject site on the Knocklyon Road is zoned as *'Objective RES'* designated *'To protect and/or improve residential amenity'*. The proposed development is residential and seeks to provide 4 no. 5-bedroom homes on the Knocklyon Road, in compliance with zoning regulations and National, Regional and Local Authority objectives.

6.2 Design

The purpose of this section is to demonstrate compliance with design standards and establish the high quality of the proposed development and how the principles applicable to a small development as proposed set out in the 'Plan Approach' (Section 5.2.1 SD CDP 2022-2028) to the delivery of sustainable neighbourhoods has been considered. This is briefly set out in the table below and expanded in the following sections.

Design Principle	Design Response
<p data-bbox="355 383 440 405">Context</p> 	<p data-bbox="817 360 1324 734">The site is identified as a potential infill development site, which is zoned for residential development. The area is urban in nature, while having the qualities of a onetime 'suburb', the area is an established residential neighbourhood. Services such as those found at the local centre of Knocklyon give an edge of village feel to the subject site. Residential development at this site would see 4 units nestled among a strong community with future residents benefiting from the suburban life while having access to the greater metropolitan area.</p>
<p data-bbox="325 786 458 835">Healthy Placemaking</p> 	<p data-bbox="817 775 1324 1081">Due to the size and location of this site, a mixed-use development or alternative type of development would not be suitable. While a small development of private houses is proposed, energy efficient residential development at this location contributes to the healthy placemaking through high quality design of the proposed development, retaining existing trees and the proposed planting of native species mix of shrubs and trees.</p>
<p data-bbox="304 1137 481 1184">Connected Neighbourhoods</p> 	<p data-bbox="817 1126 1324 1245">The proposed development allows for future residents to be less dependent on cars and to use public transport and active travel. This is further set out in Section 6.2.7 below.</p>
<p data-bbox="341 1406 440 1456">Thriving Economy</p> 	<p data-bbox="817 1395 1318 1485">The proposed development would contribute to the local economy through the use of services and retail in Knocklyon.</p>
<p data-bbox="320 1821 461 1870">Inclusive and Accessible</p> 	<p data-bbox="817 1671 1321 1883">This design principle is not applicable to a small development of 4 private residential units. However, in terms of proposed future residents, the site is accessible by bus and by foot, and would allow for accessibility to services and amenities for future residents at all ages and abilities.</p>

 <p>Public Realm</p>	<p>While this design principle is not applicable to a small development of 4 private residences, the public realm has been considered in the design of the proposed development, and through the boundary treatments for the proposed development. This is discussed in the Design Statement enclosed.</p>
 <p>Built Form and Mix</p>	<p>The build form and mix proposed is in keeping with the prevailing uses and density of the surrounding area. It does not propose an increase in height or density or a mix of uses.</p>
 <p>Design and Materials</p>	<p>The proposed development includes high quality robust materials in a contemporary design. Design and materials are described in the Design Statement by VHA and discussed further below.</p>

6.2.1 Design Statement The proposed development is supported by a Design Statement prepared by Vincent Hannon Architects (VHA), which is enclosed with this application. The Design Statement has regard to best principles of urban design and incorporates a range of graphic material including CGI images. The design proposal is for 4 no. high-quality residential units, designed to allow for privacy of existing residents and future residents of the proposed units. The development at this site is an opportunity to respond to current demands for new-build housing in the area. The proposal enables compact growth, through infill development, while in keeping with the character and charm of the existing residential developments in the area. The amenities, services and public transport provided within the locality enable quality liveability for the proposed development in line with the 10-minute settlement concept.

Refer to the Design Statement Prepared by Vincent Hannon Architects (VHA), which outlines the principles, problems and solutions which were implemented as part of the development of this proposed design.

6.2.2 Open Space

The Open Space requirement for infill sites varies in context similar to that of the density requirements. Public Open Space is required for large infill developments however the proposed development at the Knocklyon Road is for 4 units of 5 no. bedroom residential units, on 0.0843 ha, thus the small scale of this would not require provision of public open space within the proposed development. There is an abundance of available public open space within the locality, the Dodder Valley Park sits to the North of the subject site and across the road is the Knocklyon United Football Club pitch which is accessible to the public as a greenspace.

6.2.2.1 Private open space

Private Open Space is an essential amenity for the proposed developments to allow for adequate separation between the proposed units and between the surrounding dwellings. The Private Open Space allocation of Unit 1 is 71.4 sqm, Unit 2 is 71 sqm, Unit 3 is 70 sqm, and Unit 4 is 71 sqm, a total of 283.40 sqm for the entire proposed development. The allocation of this Private Open Space meets that required within the Table 3.20 of SD CDP 2022-2028, as it is stated for a residential unit with no. 4 or more bedrooms 70 sqm should be given. The Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009) state this private open space is necessary for clear definition of private and public space as well ensuring privacy and security for both the existing and proposed dwellings and residents. The units at the Knocklyon Road are positioned in compliance with these guidelines to ensure privacy and boundary distinction.

6.2.3 Density and height

The subject site is a proposed infill development as described in **Policy CS6 of the SD CDP 2022-2028** with the objective to increase housing supply and support compact growth. As set out in the Plan, the nature of infill developments is complex and can vary greatly in terms of its relation to the nature of the surrounding area, available amenities, character of the locality and proximity to adjoining dwellings. The density of the proposed development is 48 units per hectare. This density falls in line with the SD CDP 2022-2028 guide of 40–50 units per hectare within Dublin City and Suburbs (Table 11, SD CDP 2022-2028). The design and layout of the site as it is presented strikes a balance between being a sustainable compact development utilising an infill site while also in keeping with surrounding residential developments and preserving the charm of the area. The SD CDP 2022-2028 maintains the density of infill sites should align with the area, to preserve and protect the established character and respect the privacy of surrounding dwellings. The privacy and character of surrounding dwellings are preserved through the retention of boundary walls.

The SD CDP 2022-2028 and Urban Development and Building Height Guidelines (2018) maintain building heights should not exceed 3 to 4 storeys unless the increase height can be justified by distance to public transport or are in keeping with the surrounding building height. The height of the proposed development is in keeping with the prevailing heights of the existing houses in the surrounding area. This development does not propose an increased height or density as described in the Urban Height and Density Toolkit at Appendix 10 of the SD CDP 2022-2028. Nonetheless, as an infill development, a design and access statement has been provided by VHA which describes the design, setting and materiality of the proposed development.

6.2.4 Daylight and Overshadowing

H3D were appointed to survey and provide a report on the daylight and potential overshadowing related to the proposed development upon surrounding dwellings. The outset of this report states the recommendation is for *‘at least half of the amenity areas should receive at least two hours of sunlight on March 21st’* in line with the BRE guideline (BRE 209, ‘Site Layout Planning for Daylight and Sunlight: A Guide for Good Practice’). H3D carried out a 3D computer model of the scheme based on the planning drawings and carried out an analysis. The results of this study are found in the Daylight Analysis and Overshadowing Report enclosed with this application. It was concluded that the proposed development would not cause an unacceptable overshadowing impact on the neighbouring rear garden amenity spaces or loss of access to sky for the windows facing the proposed development.

A vertical Sky Component analysis was carried out on the neighbouring properties to the East and to the South. Compliance with the BRE standards was achieved for all properties, meaning that all facing windows achieve at least 27% illuminance.

A shadow study was carried out by H3D to examine the levels of overshadowing affecting the neighbouring properties. The results of this study which examined overshadowing potential in March, June, September, and December found that while some shadowing occurs in September and December

when the sun is low in the sky, however the development meets the guideline levels of amenity spaces (BRE BR209) and access to sky by conforming with the vertical sky component standards.

The proposed development will not unduly impact the residential amenity of adjoining properties with respect of daylight and overshadowing as demonstrated in the report.

6.2.5 Car Parking

The subject site is located within the Parking Zone 2 (Residential). Zone 2 (Residential) is established in the SD CDP 2022-2028 section 12.7.4 as ‘More restrictive rates for application within town and village centres, lands zoned *REGEN*, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 400-500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service)’. As per the Development Plan Parking Zone 2, a maximum of 1.5 car parking spaces per residential unit of 3 bed+ are permitted, as can be seen in *Table 7* below from the SD CDP 2022-2028. The proposed development car parking allocation is 1 in curtilage space per unit. The use of active transport is encouraged and accessible in the area. The car parking allocation follows **NPO 13** which states that:

‘In urban areas, the inclusion of 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 suitable protected.’

Notwithstanding the proposed upgrades to as part of Bus Connects, existing bus services 49, 65B, 75 and 75A accessible from Knocklyon Avenue, c. 500m from the subject site have been set out in Section 2. The Red Line Luas service is also available by a 16 min cycle from the subject site. Services, shops and schools are located at Knocklyon which is c. 650 m from the subject site. Public transport and active travel are discussed further in Section 6.2.5 and 6.2.7.

Table 7 - Residential Car Parking Allocation

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

The parking has been designed to ensure a self-regulating street environment with adequate sightlines for exiting vehicles onto the Knocklyon Road. A swept-path analysis carried out by Jennings O Donovan confirmed that adequate space is provided for the turning of vehicles. Please refer to drawing no. 6902-JOD-XX-ZZ-DR-C-003 which indicate sightlines and VHA drawing no. 180201-03-200 which illustrates contextual elevations to Knocklyon Road.

6.2.6 Public Transport Provision

The site location, in section 2 of the planning report outlines the many amenities in the locality of the site, and the variety of public transport options available. The site is serviced by the 49, 65B, 75, 75A, 175 and 15 bus routes with stops varying in distance from 5 to 19 minutes. The accessibility of numerous bus routes makes the site incredibly accessible via public transport. The buses also allow connectivity to further public transport routes such as the Luas Red Line, the Tallaght Luas stop is located within 4km, and accessible via the 49 and 75 bus routes. Under the Transport Strategy for the Greater Dublin Area 2016-2035 there are four additional routes to be made available within the subject site's vicinity, these include the A1, F1, S6 and S8, detailed in section 5.2.3 above. The proposed development as a small infill development of 4 no. residential units supports compact urban development, aided by the already existing accessible public transport the locality is suitably serviced and capable of absorbing additional compact growth. The various public transport routes available in the vicinity of the subject site support the sustainable transport and active travel policies at a local and national level. Complying with the following SD CDP 2022-2028 policies and objectives:

- **Policy SM1:** *Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.*
- **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.*
- **Policy SM3:** *Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.*

6.2.7 Cycling and Active Transport

The subject site is within an established residential area, and within close proximity to a range of services and facilities. In addition to the well serviced public transport routes surrounding the site there are available cycle routes, these are shown below in *Figure 9*. The National Transport Authority has provided a Greater Dublin Area Cycle Network Plan which proposes an increase in viable cycle pathways in the vicinity of the subject site on the Knocklyon Road, visible in *Figure 10*. The South Dublin 'Cycle South Dublin' plan was adopted in April 2021 and proposes a number of 'now', 'soon' and 'later' projects which will increase the number of cycle routes in the county. *Figure 9* shows existing routes including the Dodder River Green way which is accessible from the subject site.



Figure 9 - Existing Cycling Infrastructure

Proposed cycling infrastructure will see a number of cycle routes which will provide cycling connectivity across the county (Figure 10). ‘Now’ projects are those being progressed within the next two years. The Tallaght to Knocklyon route is at preliminary design stage and will be completed toward the end of 2023 ([South Dublin Active Travel website](#)). The proposed plans for improved cycling infrastructure will result in future residents of the proposed development having safe active travel options for commuting by bicycle.

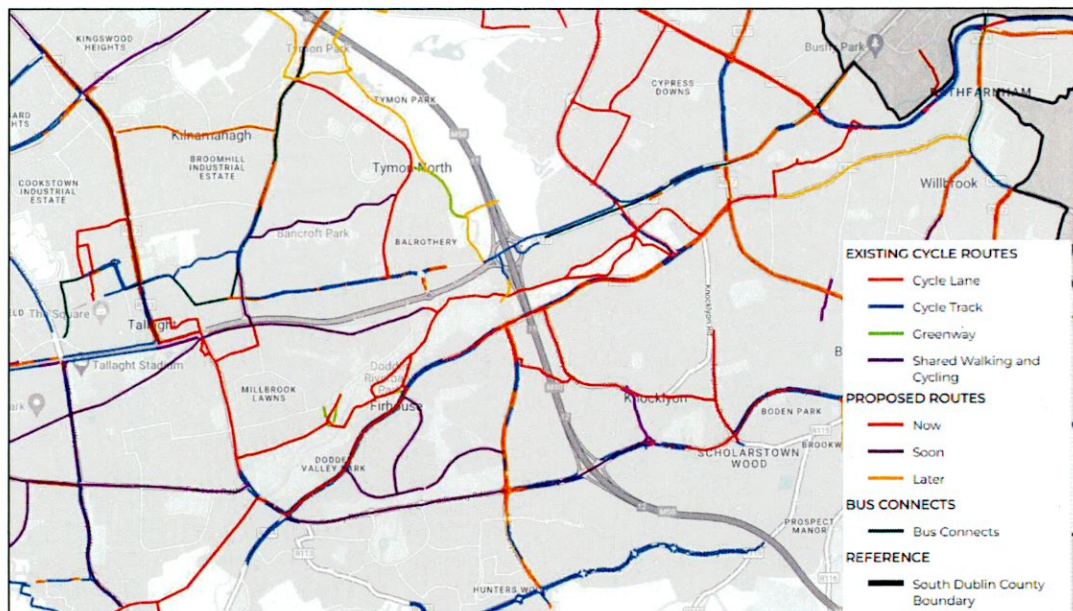


Figure 10 - Proposed Cycling Infrastructure

To the east of the site a primary school, Gaelscoil Chnoc Liamhna, is being constructed. The provision of safe and accessible active transport routes to and from the Knocklyon Road is thus of great importance to ensure the safety of residents and school going children travelling to the area. The pedestrian footpath at the east of the subject site boundary will be upgraded and car accessibility to the site will prioritise pedestrian mobility. The proposed development has examined active transport and active transport potential in compliance with the following SD CDP 2022-2028 policy and objectives:

- **Policy SM2:** 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 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.

6.2.8 Road Safety

A stage 1 / 2 Road Safety Audit was carried out by ORS and is enclosed with this application. The findings of the Road Safety Audit was considered by the design team in finalising the plans and particulars for the proposed development.

6.3 Civil Engineering

Jennings O'Donovan engineers were engaged as part of the planning design team to design water supply and drainage systems for the subject site, as well as assessing flood risk. The drawings and report enclosed as part of this application, provided by Jennings O'Donovan, provide a detailed description of the civil engineering and services to be provided, with respect to the relevant policy and standards.

6.3.1 Foul and Surface Water

Drawing no. 6902-JOD-XX-ZZ-DR-C-001 enclosed in the application refer to the proposed wastewater drainage infrastructure. The wastewater infrastructure was designed in compliance with Irish Water documents "Code of Practice for Wastewater Infrastructure" and "Wastewater Infrastructure Standard Details". The surface water drainage will be maintained by a proposed connection of each dwelling to the existing public storm sewer network. The SuDS guidelines and measures discussed in Section 5.3.1.3 have been incorporated into the design of foul and surface water drainage for the proposed development.

A new connection is proposed from the proposed development to a new foul water sewer for the Gaelscoil Chnoc Liamhna school that is currently under construction (Planning Reference: SD18A/0372) on the Knocklyon Road. The proposed connection will collect flows from the proposed residential units, details and calculations of the foul and surface water drainage are included within Sections 2 and 3 of the Civil Design Report enclosed.

6.3.2 Flood Risk Assessment

The flood risk assessment completed by Jennings O'Donovan was carried out in compliance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities issued by the Department of Environment, Heritage, and Local Government in November 2009. The assessment examined the impact of surface water runoff on the flow regimes in neighbouring watercourses, the loss of floodplain and review of historical flood records. The River Dodder lies approximately 435m North of the subject site on the Knocklyon Road.

No record of historical flooding on the subject site was found and the closest recorded flooding was 250m northeast of the subject site. This flooding occurred during a storm that equated to a 1 in 150-year flood event, with 76mm to 137mm of rainfall within a 24 hr period resulting in the flooding of two houses. The flood risk assessment concluded that *'the proposed development site is not at risk of flooding (fluvial, tidal, pluvial or groundwater) and the proposed works will not result in any significant change in risk or flooding regime.'* And no further stages of flood risk assessment should be required.

6.4 Archaeological Assessment

Fado Archaeology were engaged to carry out an Archaeological Assessment at the subject site to ensure compliance with the SD CDP 2022-2028.

- **Policy NCBH1** 'Protect, conserve and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.'

This report is enclosed with this application. This assessment consisted of desktop research and a site walkover, both identified the site held no evidence of any archaeological features or material remains. Archaeological, historical, and cartographic sources are utilised within this research. The results of the assessment concluded that 'Due to the small overall size (approximately 0.087 hectares) of the proposed development, the lack of recorded archaeological monuments within the vicinity of the subject site it is not recommended that the site be subject to further archaeological mitigation in the form of testing or monitoring.'

6.5 Environmental & Biodiversity

The ecology and biodiversity of the subject site has been closely examined in preparation for this application and the following sections provide summaries of the reports accompanying the application with reference to the relevant policy. Aviro were engaged to carry out the following Ecological Appraisal and Appropriate Assessment Screening Report for the subject site. The Ecological Appraisal and Appropriate Assessment Screening Report enclosed within this application should be read in conjunction with one another.

6.5.1 Ecological Appraisal

The Ecological Appraisal carried out by Aviro was done so to ensure compliance with the SD CDP 2022-2028.

- **Policy NCBH2:** Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.
- **NCBH2 Objective 1:** To support the implementation of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021-2025) and to support the adoption and implementation of the South Dublin County Biodiversity Action Plan (2020-2026) and Pollinator Action Plan (2021-2025) and any superseding plans.

The recommendations suggest trees and hedgerows are retained and protected during construction where possible. The removal of trees and hedgerows should be compensated with the planting of native species, listed within the report, as property boundaries and within rear gardens. The provision of compensatory flora is to ensure habitat connectivity is maintained. Invasive species Virginia creeper was identified within the subject site, it is recommended that this is managed within physical or chemical control, as is outlined in section 6.1 of the ecological appraisal.

The habitats identified on site are of moderate ecological value, suitable for commuting and foraging bats. Measures must be taken during construction of the proposed development to mitigate disturbance of the commuting and foraging bats; these measures are detailed within section 6.2 of the ecological appraisal enclosed.

The assessment of the site noted that there was no evidence was found indicating the presence of Badgers, Otters, Pine Martins, the common frog, or Red Squirrels on the site. The site and surrounding environs were not considered to be optimal for the habitats, commuting or foraging of these protected species otter habitats, commuting, or foraging otters. Although no evidence of badger setts was identified within the

subject site, they are highly mobile species and so precautionary measures should be taken during construction of the proposed development. Recommendations are made within the report to mitigate any impacts to protected species and potential habitats on the subject site. During the construction of the proposed development 'any open excavation pits or trenches should have wooden planks placed within them overnight and outside construction periods to provide a means of escape and to avoid accidental trapping of mammals or other wild/domestic animals within them'.

All breeding bird's species are protected by legislation and so the removal of vegetation must only be undertaken outside of the breeding season, extending from 1st March to 31st of August. The report makes recommendations to mitigate noise and vibration effects on foraging and commuting bats during proposed development construction, these include avoidance of inappropriately designed night-time lighting to avoid habitat fragmentation.

6.5.2 Appropriate Assessment Screening Report

The appropriate assessment was carried out in compliance with The Birds Directive, The EU Habitats Directive and The Water Framework Directive, to ensure protection of Special Areas of Conservation (SAC) and Special Protection Areas (SPA). This report ensures accordance with the following SD CDP 2022-2028 policies and objectives:

- **NCBH2 Objective 2:** *To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation.'*
- **NCBH2 Objective 3:** *To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as 'stepping stones' for the purposes of green infrastructure and Article 10 of the Habitats Directive.'*
- **Policy NCBH3: Natura 2000 Sites** *Conserve and protect Natura 2000 sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.'*

For Stage 1: Screening of the subject site, a desk study was carried out, as well as a walkover by a qualified ecologist, to survey the site. The site was not noted as being located within 2km of any Special Protected Areas (SPA), Special Areas of Conservation (SAC) or National Heritage Area (NHA). The conclusion of the report is that the proposed development *'whether individually or in combination with other plans and projects, will have no impact upon any Natura 2000 sites. The integrity of these sites will be maintained, and the habitats and species associated with these sites will not be adversely affected. It is of the opinion of this author that this application does not need to proceed to Stage II of the Appropriate Assessment process.'*

7. **CONCLUSION**

This planning report has been prepared by MKO to support a planning application for residential development at the Knocklyon Road, Knocklyon, Dublin 16 to South Dublin County Council. The proposed development will assist South Dublin County Council in meeting its commitment to provide for residential development ensuring the protection of existing residential amenity and will contribute to sustainable compact growth.

The proposed development presents the opportunity for compact urban growth in the form of an infill development of 4 no. units of high-quality design which would allow for sustainable urban living, the utilisation of sustainable transport modes and the benefit to residents of easy access to local amenities, schools, and recreation facilities.

In summary, it is submitted that the proposed development results in a development which fully accords with the proper planning and development of the area while providing an attractive, high quality, contemporary development. It is submitted that the proposed scheme represents a significant planning gain as it supports the aims and objectives of the South Dublin County Development Plan 2022-2028 and national policies to deliver compact urban growth.

