

# SLA

Stephen Little  
& Associates

Planning  
Application  
to South  
Dublin County  
Council

Planning  
Application  
Report

Proposed Residential  
Development and All  
Associated and  
Ancillary Works.

In the townland of  
Adamstown, within  
the Clonburrish  
Strategic Development  
Zone (Adamstown  
Extension -  
Development Areas  
AE-S1 and AE-S2)

For Clear Real Estate  
Holdings Limited

**FEBURARY 2023**

## Document Control: -

Author	Checked by	Version	Date
TP	NO'C	Draft	11.11.2022
NO'C	MO'S	Final Draft	30.01.2022
NO'C	<i>Michael Sulli</i>	Final	03.02.2023

**TABLE OF CONTENTS**

<b>1</b>	<b>INTRODUCTION</b> .....	<b>1</b>
1.1	COMPLIANCE WITH PLANNING REGULATIONS.....	1
1.2	PLANNING DURATION.....	1
<b>2</b>	<b>SITE DESCRIPTION &amp; CONTEXT</b> .....	<b>3</b>
2.1	CLONBURRIS.....	3
2.2	APPLICATION SITE.....	4
2.3	SURROUNDING LAND USES.....	5
<b>3</b>	<b>PLANNING HISTORY</b> .....	<b>5</b>
3.1	SUBJECT SITE .....	5
3.2	CLONBURRIS SDZ .....	5
3.2.1	Permitted Development .....	5
3.2.2	Planning Applications to be Decided .....	6
3.3	RECORD OF RESIDENTIAL DEVELOPMENT IN CLONBURRIS .....	7
<b>4</b>	<b>PRE-PLANNING CONSULTATION</b> .....	<b>8</b>
4.1	OTHER DEPARTMENTS.....	8
4.1.1	Housing Department .....	8
4.2	PRESCRIBED BODIES.....	9
4.2.1	Irish Water .....	9
4.2.2	Irish Aviation Authority.....	9
<b>5</b>	<b>PROPOSED DEVELOPMENT</b> .....	<b>10</b>
5.1	KEY SITE STATISTICS .....	11
5.2	PROPOSED RESIDENTIAL DEVELOPMENT.....	11
5.2.1	Build-to-Rent .....	12
5.3	PROPOSED ANCILLARY DEVELOPMENT .....	12
5.4	DESIGN & LAYOUT.....	13
5.5	SUNLIGHT AND DAYLIGHT ASSESSMENT .....	15
5.6	RESIDENTIAL DENSITY .....	15
5.7	LANDSCAPE PROPOSALS.....	15
5.8	ARBORICULTURE.....	17
5.9	PUBLIC LIGHTING & SITE SERVICES.....	18
5.10	LANDSCAPE AND VISUAL IMPACT ASSESSMENT .....	18
5.11	WATER SERVICES.....	18
5.11.1	Water Supply .....	18
5.12	TRANSPORTATION.....	19
5.12.1	Access / Layout.....	19
5.12.2	Car Parking.....	19
5.12.3	Bicycle Parking.....	20
5.13	ENERGY STATEMENT .....	20
5.14	TAKING IN CHARGE .....	20
5.15	RESOURCE WASTE MANAGEMENT PLAN.....	20
5.16	OPERATIONAL WASTE MANAGEMENT PLAN .....	20
5.17	INWARD NOISE ASSESSMENT .....	21
5.18	BUILDING LIFECYCLE REPORT .....	21
5.19	DEMOLITION .....	21
5.20	PART V.....	21
<b>6</b>	<b>STRATEGIC PLANNING CONTEXT</b> .....	<b>22</b>
6.1	NATIONAL PLANNING FRAMEWORK – IRELAND 2040.....	22
6.2	EASTERN AND MIDLANDS REGIONAL SPATIAL & ECONOMIC STRATEGY .....	23
6.3	TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2022 – 2042 .....	24
6.4	SECTION 28 MINISTERIAL GUIDELINES.....	25

6.4.1	Sustainable Residential Guidelines in Urban Areas (Cities, Towns, Villages) (2009) .....	25
6.4.2	Urban Design Manual – A Best Practice Guide (2009).....	26
6.4.3	Quality Housing for Sustainable Communities (2007).....	29
6.4.4	Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022).....	29
6.4.4.1	Apartment Mix (SPPR 1).....	30
6.4.4.2	Apartment Floor Area (SPPR 3).....	30
6.4.4.3	Dual Aspect (SPPR 4).....	31
6.4.4.4	Floor to Ceiling Height (SPPR 5) .....	31
6.4.4.5	Lift and Stair Core (SPPR 6) .....	31
6.4.4.6	Other Design Standards for New Apartments .....	32
6.4.5	The Planning System and Flood Risk Management (2009).....	34
6.4.6	Design Manual for Urban Roads and Streets (2013) .....	35
<b>7</b>	<b>SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028 .....</b>	<b>36</b>
7.1	CORE STRATEGY .....	36
7.2	LAND USE ZONING.....	36
7.3	GREEN INFRASTRUCTURE .....	36
7.4	HOUSING .....	37
7.5	OPEN SPACE.....	38
7.6	CAR PARKING STANDARDS.....	39
7.7	BICYCLE PARKING STANDARDS .....	40
<b>8</b>	<b>COMPLIANCE WITH CLONBURRIS STRATEGIC DEVELOPMENT ZONE PLANNING SCHEME 2019.....</b>	<b>41</b>
8.1	LAND USE .....	41
8.1.1	Character Area.....	42
8.1.2	Residential Units and Density .....	42
8.1.3	Non-Residential Development.....	43
8.1.4	Residential Dwelling Mix .....	43
8.2	MOVEMENT AND TRANSPORT .....	43
8.2.1	Street Hierarchy.....	43
8.2.1.1	Internal Movement Strategy.....	45
8.2.2	Car Parking Standards.....	46
8.2.3	Bicycle Parking Standards.....	47
8.2.4	Transport Assessment .....	48
8.2.5	Mobility Management Plan .....	48
8.3	GREEN AND BLUE INFRASTRUCTURE .....	48
8.3.1	Sustainable Urban Drainage .....	49
8.4	BUILT FORM AND DESIGN .....	49
8.4.1	Design Criteria .....	49
8.4.2	Block Size and Form.....	50
8.4.3	Building Height .....	50
8.5	SERVICES AND INFRASTRUCTURE .....	52
8.5.1	Water Supply .....	52
8.5.2	Foul Water Drainage.....	52
8.5.3	Surface Water Drainage.....	52
8.5.4	Energy and Efficiency.....	53
8.5.5	Waste Management .....	53
8.6	LANDSCAPE AND OPEN SPACES .....	54
8.6.1	Proposed Open Spaces .....	54
8.7	BIODIVERSITY AND NATURAL HERITAGE .....	54
8.7.1	Grand Canal .....	55
8.7.2	Ecological Corridor.....	55
8.7.3	Street Trees .....	55
8.7.4	Hedgerows.....	55
8.8	HERITAGE PRESERVATION.....	56
8.9	COMPLIANCE WITH PHASING REQUIREMENTS .....	56

**9 ENVIRONMENTAL ASSESSMENTS ..... 59**

9.1 CONSTRUCTION & ENVIRONMENTAL MANAGEMENT PLAN ..... 59

9.2 APPROPRIATE ASSESSMENT ..... 59

9.3 ECOLOGICAL IMPACT ASSESSMENT ..... 59

9.4 SCREENING FOR ENVIRONMENTAL IMPACT ASSESSMENT ..... 59

**10 CONCLUSION ..... 60**

**11 ENCLOSURES ..... 61**

## 1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, are instructed by our Client (the Applicant), Clear Real Estate Holdings Limited, to prepare this Planning Application Report to accompany a planning application for residential development in Adamstown Extension in the Clonburris Strategic Development Zone (SDZ).

The proposal seeks permission for a period of 7 years for development comprising 385no. units (139no. houses, 70no. 'Build-to-Rent' duplex / apartments, 72no. duplex / apartments and 104no. apartments), tenant amenity building, areas of public open space and all associated and ancillary site development works within the approved Clonburris Strategic Development Zone Planning Scheme, 2019 ("the Planning Scheme") to form part of Adamstown Extension – Development Area 11. The proposed development delivers on the key objectives for Development Area 11 to develop "a high-quality residential neighbourhood as an extension to Adamstown".

A Site Location Map, prepared by Burke Kennedy Doyle Architects which identifies the application site has been prepared and is enclosed with this planning application – Dwg. No. 6268-P-001 – 'Site Location Plan'.

This Planning Application Report sets out how, in our opinion, the scheme complies with the proper planning and sustainable development of this area in the context of the relevant strategic local, regional and national planning policy as expressed primarily in the Planning Scheme and the South Dublin County Development Plan 2022 – 2028 ("the Development Plan").

An Environmental Impact (EIA) Screening Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants accompanies this planning application. The EIA Screening Report concludes that an Environmental Impact Assessment Report (EIAR) is not required having regard for the provisions of the Planning & Development Regulations 2001, as amended.

Enclosed is a Part V Proposal Letter, prepared by Clear Real Estate Holdings Limited. The associated Part V Layout, prepared by Burke Kennedy Doyle Architects accompanies this planning application. These identify how the Applicant proposes to comply with Section 96 of Act, as agreed in principle with South Dublin County Council (SDCC) Housing Department. We confirm that the Applicant purchased the application site within the period 1 September 2015 and 31 July 2021. This Application is one that will be determined by SDCC, in the period before 31 July 2026. As a result of the above, in line with Section 96(3)(j) of the Act, the appropriate Part V requirement is 10%. A Part V Validation Letter from SDCC Housing Department, is also enclosed.

In accordance with the statutory regulations, we confirm that an electronic fund transfer (EFT) has been issued to SDCC to the sum of €25,637.00 as the appropriate planning application fee. Proof of the EFT payment is enclosed with the application.

This Report should be read in conjunction with the plans and particulars accompanying this planning application. A list of the various accompanying application material is outlined at the end of this Report. We refer the Planning Authority also to the individual schedules that accompany consultants plans and particulars.

### 1.1 Compliance with Planning Regulations

We confirm that this planning application including the enclosed drawings, public notices and application form, have been prepared in accordance with the requirements of the Planning & Development Regulations, 2001 as amended.

### 1.2 Life of Permission Sought

Section 41 of the Planning & Development Act 2000, as amended: -

*(1) Without prejudice to the powers conferred on them by this Part and Part XXI to grant a permission to develop land for a limited period only, in deciding to grant a permission under section 34, 37, 37G, 37N or 293, a planning authority or the Board, as may be appropriate, may, having regard to the nature and extent*

*of the relevant development and any other material consideration, specify the period during which the permission is to have effect, being a period—*

*(a) in the case of all development requiring permission, of not less than 2 years, and*

*(b) in the case of residential development requiring permission, of not more than 10 years,*

*and where the planning authority or the Board exercises, or refuses to exercise, the power conferred on it by this section, the exercise or refusal shall be regarded as forming part of the relevant decision of the authority or the Board under section 34, 37, 37G, 37N or 293.*

*(2) Where an application for permission relates to a residential development comprising 10 or more houses—*

*(a) material considerations in subsection (1) may include any information available to the planning authority or furnished to it by the applicant concerning implementation by the applicant of any housing development in the previous 5 years, and*

*(b) an assessment by the planning authority of the likelihood of the proposed development being implemented within the appropriate period sought, being the appropriate period within the meaning provided for by section 40(3).*

Permission with a life of 7 Years is sought in this case.

Given the nature and scale of the proposed development, a 7 Year permission is considered necessary and reasonable on the basis that: -

- Delivery of key infrastructure (roads, wastewater and surface water) are being developed by Third Parties. If not in place in a timely manner the commencement of the proposed development may be delayed post grant of planning permission.
- Design and construction programme being delayed beyond 4 years given the scale of the project.
- On-going inflationary pressure affecting construction costs.
- The longer permission period allows for fluctuations in development output (i.e. construction of units) on a yearly basis to respond to potential changes in the construction market

For the reasons set out above, it is considered that a 7 Year permission period is considered appropriate as a contingency measure to protect the timely delivery of a significant quantum of housing, that is supported by long range strategic national and regional planning policy and in a plan-led manner by the local statutory Development Plan and approved Planning Scheme.

## 2 SITE DESCRIPTION & CONTEXT

### 2.1 Clonburris

Clonburris is a Strategic Development Zone, consisting of approximately 280 Ha of greenfield land. It is in a prime location for urban expansion, located to the west of Dublin City Centre and the M50 within the triangle between Lucan, Clondalkin and Liffey Valley. Clonburris is a logical area to continue the expansion of the Dublin Area. Clonburris is bisected from east to west by the Grand Canal and the Dublin-Kildare / Cork railway line and by two strategic north-south roads – Grange Castle Road in the centre of the site and the Fonthill Road to the East. Newcastle / Lock Road (R120) forms part of the land’s western boundary. Grange Castle Business Park is located just to the south of the Grand Canal and Adamstown SDZ is located to the north-west boundary of Clonburris on the opposite side of the railway line in that location.

Clonburris is an area that provides a logical and sequential expansion of the Greater Dublin Area along the western corridor served by the railway line. Despite its location and context, the area has never been developed to any significant degree and retains its rural character. Clonburris is currently characterised by agricultural landscapes. Current developments on the land consist of a primary and secondary school, a number of private residents, together with traveller accommodation constructed by SDCC. There are also two train stations within the SDZ; the Clondalkin-Fonthill station is operational, whereas the Kishoge station is not operational (but due to open in late 2023); both having an associated park and ride facility.



**Figure 1:** Extract from the Planning Scheme showing the extent of the Planning Scheme boundary in red and application site highlighted in orange (Overlay by SLA).



## 2.2 Application Site

The overall Clonburris SDZ lands are located to the west of Dublin City Centre and the M50, between the N4 and N6 National Primary routes. The subject site for this planning application is located in the westernmost portion of the Planning Scheme in the Adamstown Extension Development Area. The overall Adamstown Extension lands is bisected from east to west by the permitted Clonburris Southern Link Street (permitted under SDCC Reg. Ref. SDZ20A/0021) and is generally bounded to the east by Hayden’s Lane, to the south by the Grand Canal, to the west by R120 (which accesses Adamstown SDZ from the south), and the Dublin-Kildare / Cork rail line to the north. The Adamstown Extension lands is bisected from east to west by the permitted Clonburris Southern Link Street (permitted under SDCC Reg. Ref. SDZ20A/0021). The Adamstown SDZ is located to the north-west of the subject site on the northern side of the Kildare-Cork rail line.

The general topography of the overall SDZ lands is reasonably flat excluding the existing surrounding roads and railway. The majority of the primary road network traversing and bounding the site is elevated above the site.

The application site is generally bounded to the east by Hayden’s Lane and Griffeen River, to the south by Lucan Pitch & Putt, to the west by R120 (which accesses Adamstown SDZ from the south), and the Kildare-Cork rail line to the north. The application site is mainly undeveloped with large areas of scrub and green vegetated areas along the proposed road alignment. The application site can be seen below in Figure 2.

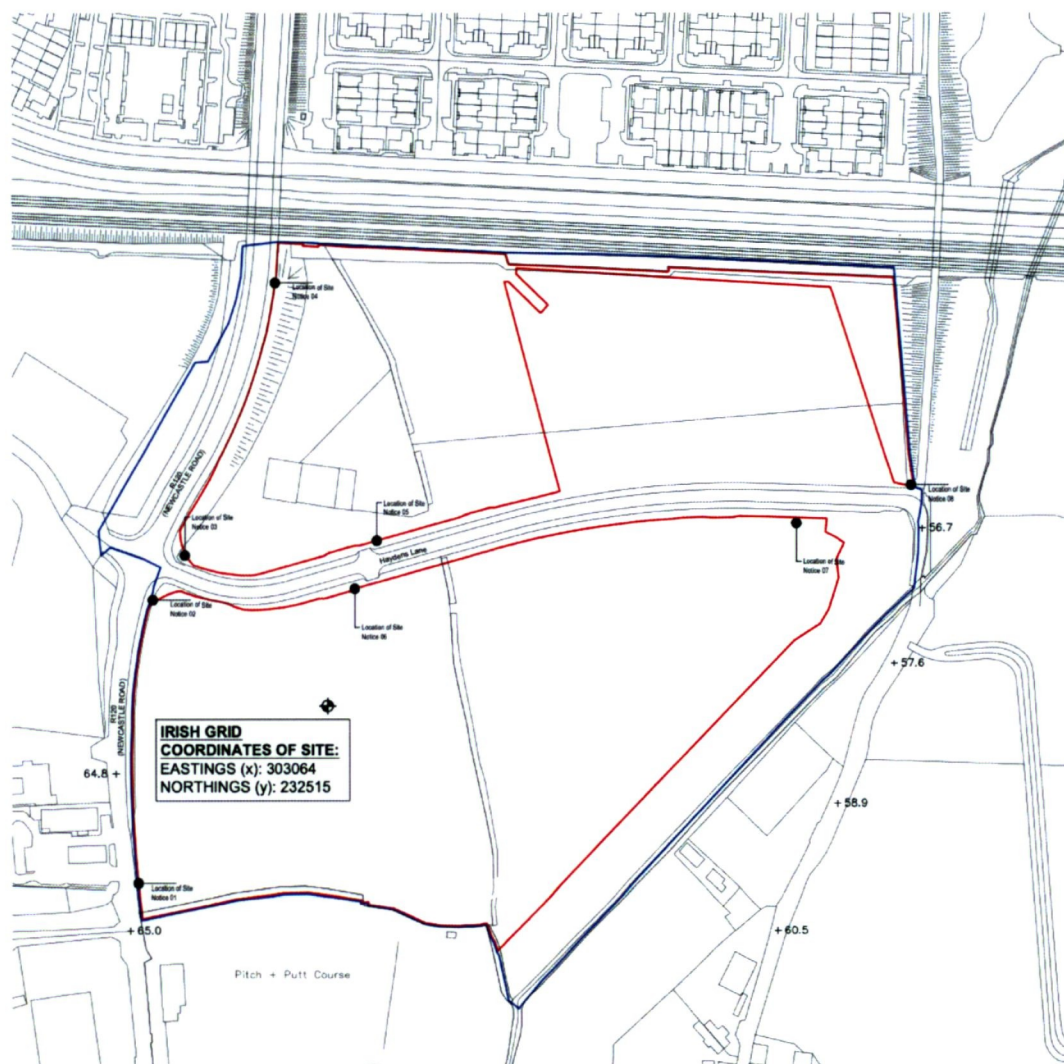


Figure 2: Extract from Drawing 6268-P-001 Site Location Map prepared by Burke Kennedy Doyle Architects showing subject site outlined in red.

## 2.3 Surrounding Land Uses

The subject area is generally surrounded by varying developed and undeveloped lands with a mix of transportation infrastructure adjacent in all directions. The lands of the Clonburris SDZ (lying entirely east of the subject site) are undeveloped, level greenfields populated by a mix of shrubs and vegetation. Within the SDZ lands there is a pitch-and-put course, a primary and secondary school, a number of residential dwellings, together with both social housing and traveller accommodation constructed by SDCC.

To the northwest of the subject site is the Adamstown SDZ which incorporates a mix of private residences, commercial uses, and community services. Servicing the SDZ's is the Kildare–Cork railway which stops at the Clondalkin Fonthill Station (in Clonburris) and Adamstown Station (in Adamstown). Other developments to the west and south of Adamstown Extension include a petrol station, a GAA club, and the Grange Castle International Business Park situated in Clondalkin.

## 3 PLANNING HISTORY

Based on planning searches of the SDCC online web-based planning search, Stephen Little & Associates understands that there has been no recent planning permission for development within the application site and 10no. significant planning permissions within the surrounding SDZ lands. The planning search has considered all relevant applications made within the past 10 years.

### 3.1 Subject Site

There is no relevant planning history within the application site.

### 3.2 Clonburris SDZ

#### 3.2.1 Permitted Development

##### **SDCC Reg. Ref. SDZ20A/0021**

Clonburris Infrastructure Limited sought a 10 year permission for roads and drainage infrastructure works under the Clonburris Strategic Development Zone Planning Scheme (2019) to form part of the public roads and drainage networks providing access and services for the future development of the southern half of the overall SDZ lands; the roads infrastructure works are for the construction of c. 4.0 km of a new road, known as Clonburris Southern Link Street.

The Planning Authority issued a Grant of Permission on 22 June 2021.

The Clonburris Southern Link Street transects the application site. As part of the proposed development minor amendments are proposed to permitted infrastructure to facilitate connections to the permitted Clonburris Southern Link Street and drainage infrastructure.

Works on the roads and drainage infrastructure are due to commence in 2023.

##### **SDCC Reg. Ref. SDZ21A/0022**

Cairn Homes Properties Ltd. lodged an application for the construction of a 569no. unit residential development with an accompanying creche, innovation hub, public open space and ancillary works and landscaping. In this case, the subject site lies to the east of the application site within the Clonburris southwest Development Area in the Clonburris SDZ lands.

The Planning Authority issued a Grant of Permission for the development subject to 38no. conditions on the 23 August 2022. This scheme is located approximately 1.5km to East of the site. Works have commenced on site as of the 30 January 2023.

**SDCC Reg. Ref. SDZ21A/0006**

On the 11 October 2021 Irish Water applied for permission for a wastewater pumping station to the east of Fonthill Road (R113) and west of Cappaghmore, Cappagh, Clondalkin, Co. Dublin within the Clonburris SDZ.

Permission was granted on the 8 November 2021.

**SDCC Reg. Ref. SD228/0001**

SDCC made a Part 8 Planning Application pursuant to the Planning & Development Regulations 2001, as amended for a 118no. unit social housing complex on a total site area of 2.5 Ha within the canal extension area of the Clonburris SDZ. Included in the permitted development is 112no. car parking spaces and 24no. bicycle parking spaces, as well as all ancillary works and landscaping.

The permission was granted at a Council Meeting on 13 June 2021.

This scheme is located approximately 2.5km southeast of the application site. Upon review of the Building Control Management Systems there is no evidence of this development being commenced at the time of this application.

**SDCC Reg. Ref. SD228/0003**

SDCC submitted a Part 8 Planning Application pursuant to the Planning & Development Regulations 2001, as amended for 263no. residential units, community facilities and open space in the Kishogue Southwest sub-sector of the Clonburris SDZ lands.

This permission was granted at a Council Meeting held on the 11 July 2022.

This scheme is located 2km east of the application site. Upon review of the Building Control Management Systems there is no evidence of this development being commenced at the time of this application.

**SDCC Reg. Ref. SD13A/0048**

Dublin V.E.C lodged an application for the construction of a post-primary school with a capacity of 1,000no. pupils comprising of 3no. integrated 3-storey blocks.

The development, which was permitted by the Planning Authority on 26 June 2013, is located to the northeast of the application site to the north of the railway line within the Planning Scheme lands. This permission was obtained when the subject lands were located with the designated Clonburris Local Area Plan this has since been superseded by the Planning Scheme.

Upon review of the Building Control Management Systems there is no evidence of this development being commenced at the time of this application. We note this application has now withered.

**3.2.2 Planning Applications to be Decided****SDCC Reg. Ref. SDZ22A/0011**

The Department of Education applied for planning permission on the 2 August 2022 for a primary school of c. 3,355 sq. m 2 storeys in height and will comprise 16no. classrooms with an additional 2no. Special Education Needs Units, a general-purpose hall and hard and soft landscaping and play works.

The Planning Authority sought Further Information on the 26 September 2022. Further information has been lodged on the 20 January 2023 and a decision is due on the 16 February 2023.

**SDCC Reg. Ref. SDZ22A/0017**

On the 2 December 2022 Cairn Homes Properties Ltd. applied for permission for 157 dwellings, comprising 81no. houses and 79no. apartments within the South-West Development Area of the Clonburris SDZ.

A decision is due from the Planning Authority on the 6 February 2023.

**SDCC Reg Ref. SDZ22A/0018**

On the 15 December 2022 Cairn Homes Properties Ltd. applied for permission for a mixed-use development within the Development Areas CUCS3 & CSWS3 of the Clonburris SDZ Planning Scheme. The development in summary comprises of 594no. apartments, office floorspace, 4no. retail units, a creche and an Urban Square.

A decision is due from the Planning Authority on the 17 February 2023.

**SDCC Reg. Ref. SDZ22A/0010**

Kelland Homes Ltd. lodged an application for 294no. dwellings, creche and retail / commercial unit within the Southeast Development Area (CSE-S1 and CSE-S2) and part of Clonburris Urban Centre (CUC-54) as identified in the Clonburris SDZ Planning Scheme.

No decision has been made on this application. The Planning Authority sought Clarification of Additional Information on the 4 January 2023. At the time of making this planning application, there has been no response to the request for Clarification of Further Information.

**3.3 Record of Residential Development in Clonburris**

The below table outlines a list of residential developments throughout the Planning Scheme to date: -

Reg. Ref.	Applicant	Description	Date of Grant	Status	No. of Units	Cumulative No. of Units
SD228/0001	SDCC	Canal Extension	13-Jun-21	Granted Permission	118	118
SD228/0003	SDCC	Kishogue South West	11-Jul-22	Granted Permission	263	381
SDZ21A/0022	Cairn Homes Properties Ltd.	Clonburris South West	23-Aug-22	Commenced	569	950
Proposed Development	Clear Real Estate Holdings Limited	Adamstown Extension	Awaiting Decision	-	385	1,335
<b>Potential Cumulative No. of Units</b>						<b>1,335</b>

At the time of making this planning application, site clearance / enabling works for permitted residential development within the Clonburris Southwest Development Area in the Clonburris SDZ lands (SDCC Reg. Ref. SDZ21A/0022 refers) have commenced. This is the only active residential development in the Clonburris SDZ lands and as such no units have been completed / occupied yet.

Works on the roads and drainage infrastructure permitted under SDCC Reg. Ref. SDZ20A/0021 are due to commence in 2023.

## 4 PRE-PLANNING CONSULTATION

Pre-planning Consultation was held with the Planning Authority over the course of the preparation of this application. The following personnel from the Planning Authority were present at one or more of these consultations: -

- Eoin Burke – Planning
- Colm Harte – Planning
- Sarah Watson – Planning
- Pdraig Collins – Planning
- Graham Murphy – Roads
- John McGee – Roads
- Debbie O’Dempsey – Part V
- Fionnuala Colins – Parks
- Ronan Toft – Drainage

We confirm the dates of the Pre-Planning Consultation with SDCC below: -

- Meeting 1 – 1 April 2022.
- Meeting 2 – 28 September 2022.

The initial pre-planning consultation received a positive response from the Planning Authority in regard to the proposed development. Minor design revisions were proposed in relation to the apartment block design, road typologies public amenity space and parking. The Client welcomed these suggestions and revised the proposed development in suit.

In the second pre-planning consultation, the Planning Authority was broadly satisfied that all issues raised in the previous Pre-Planning meeting were addressed.

The proposal subject of this planning application to SDCC has had full regard to issues raised by the Planning Authority at pre-planning consultation stage.

We do however acknowledge the ‘wholly without prejudice’ nature of these Pre-Planning Consultations.

### 4.1 Other Departments

In addition to the above formal Pre-Planning Meeting, there were a number of meetings held with officials from the individual Departments throughout this process.

#### 4.1.1 Housing Department

The Applicant has also engaged with SDCC Housing Department to identify how they intend to meet their Part V obligations.

Enclosed with the application is a Part V Proposal Letter, prepared by Clear Real Estate Holdings Limited, and associated drawing prepared by Burke Kennedy Doyle Architects (Refer to accompanying Drawing Register). These identify how the Applicant proposes to comply with Section 96 of the Planning & Development Act 2000 (as amended).

A Part V Validation Letter from SDCC Housing Department, is enclosed with this planning application.

## **4.2 Prescribed Bodies**

### **4.2.1 Irish Water**

A Confirmation of Feasibility (CoF) from Irish Water, dated 10 January 2023 is enclosed with this planning application. This CoF confirms that there is sufficient capacity for water supply without upgrade and that wastewater connection was feasible subject to certain upgrade works.

The required upgrade works for part of the permitted roads and drainage infrastructure works (SDCC Reg. Ref. SDZ20A/0021 refers). Works on the roads and drainage infrastructure are due to commence in 2023.

We refer the Planning Authority to the Statement of Design Acceptance, dated 18 January 2023, in respect of the proposed development, which demonstrates compliance with Irish Water Standards and confirms that connection to the Irish Water network is feasible.

### **4.2.2 Irish Aviation Authority**

Stephen Little and Associates Chartered Planners & Development Consultants consulted the Irish Aviation Authority (IAA) on the development proposals by letter dated 17 November 2022. The IAA responded on 7 December 2022 (enclosed) confirming the Authority have no observations in relation to the proposed development.

## 5 PROPOSED DEVELOPMENT

The planning application site (c. 8.94 Ha) is located in the westernmost portion of the Planning Scheme in the Adamstown Extension Development Area (AE-S1 and AE-S2). The Adamstown Extension lands is bisected from east to west by the permitted Clonburris Southern Link Street (permitted under SDCC Reg. Ref. SDZ20A/0021) and is generally bounded to the east by Hayden's Lane and Griffeen River, to the south by Lucan Pitch & Putt, to the west by R120 (which accesses Adamstown SDZ from the south), and the Kildare-Cork rail line to the north. The Adamstown SDZ is located to the north-west of the subject site on the northern side of the Kildare-Cork rail line. The application site is mainly undeveloped with large areas of scrub and green vegetated areas along the proposed road alignment.

The proposal seeks permission for a period of 7 years for development 385no. dwelling units (139no. houses, 70no. 'Build-to-Rent' duplex / apartments, 72no. duplex / apartments and 104no. apartments), ranging between 2 – 6 storeys in height comprising the following: -

- Total of 139no. houses consisting of: -
  - 102no. 3-bedroom 2 storey terraced houses (House Type: D, E & F).
  - 11no. 4-bedroom 2 storey terraced houses (House Type: C).
  - 26no. 4-bedroom 3 storey terraced houses (House Type: A & B).
- Total of 70no. 'Build-to-Rent' duplex / apartments units consisting of: -
  - 35no. 2-bedroom units (House Type: J, L & O).
  - 35no. 3-bedroom units (House Type: K, M & P).
- Total of 72no. duplex / apartment units consisting of: -
  - 36no. 2-bedroom units (House Type: J, L & O).
  - 36no. 3-bedroom units (House Type: K, M & P).
- Total of 104no. apartment units accommodated in 2no. blocks ranging from 4 – 6 storeys consisting of: -
  - 48 no. 1-bedroom units (House Type: A1 & A2).
  - 56 no. 2-bedroom units (House Type: B1 & B2).
- Private rear gardens are provided for all houses. Private patios / terraces and balconies are provided for all duplexes and apartments.
- Vehicular access to serve the development is provided off the Clonburris Southern Link Street permitted under SDCC Reg. Ref. SDZ20A/0021 and currently under construction. Pedestrian and cycle access is also provided to the Newcastle Road (R120) and to the Clonburris Southern Link Street.
- All associated and ancillary site development, infrastructural, hard and soft landscaping and boundary treatment works, including: -
  - A single storey tenant amenity building (c. 170 sq. m);
  - Areas of public open space (1.45Ha);
  - 538no. car parking spaces and 878no. bicycle parking spaces (660no. long-term spaces and 218no. visitor spaces)
  - Bin and bicycle stores;
  - Plant provided at undercroft level and additional plant provided at roof level (including solar panels) of the proposed apartment blocks.
  - 3no. ESB Sub-stations.
  - Demolition of remaining walls and hardstanding associated with a former agricultural building.

- The development proposed includes minor revisions to an attenuation pond, connections to water services (wastewater, surfacewater and water supply) and connections to permitted cycle / pedestrian paths permitted under SDCC Reg. Ref. SDZ20A/0021.

### 5.1 Key Site Statistics

In summary, the key statistics for the proposed developments are outlined below: -

Key Site Statistics	
Total Number of Units	385no. units
Gross Floor Area (Residential Only)	c. 39,234 sq. m
Gross Site Area	c. 8.94 Ha
Net Site Area	c. 7.43 Ha
Net Density	51.8no. units per Ha
Unit Mix	<b>1-Bed:</b> 48 (13% of total units) <b>2-Bed:</b> 127 (33% of total units) <b>3-Bed:</b> 173 (45% of total units) <b>4-Bed:</b> 37 (9% of total units)
Public Open Space	c. 1.45 Ha
Communal Open Space	c. 2,571 sq. m
Part V	39no. units
Plot Ratio (Gross Site Area)	0.52
Site Coverage (Gross Site Area)	23%

### 5.2 Proposed Residential Development

385no. residential units are proposed in this case, including a mix of 15no. different unit types. These range from apartments, duplexes and houses.

The housing design typology ranges from deep plan to wide frontage semi-detached and terraced houses, of two to three storeys, and accommodating 3 and 4 bed units.

The apartment design typology is reflected in 2no. apartment buildings, ranging from 1 to 5 storeys, and accommodating a range of 1, 2 and 3 bed apartment units.

The duplex design typology is reflected in 7no. blocks, ranging from 2 to 3 storeys, and accommodating a range of 1, 2 and 3 bed apartment and duplex units.



UNIT TYPES	UNIT TYPE DESCRIPTION	GROSS INTERNAL AREA (m <sup>2</sup> ) *		NUMBER OF UNITS	TOTAL AREA	BED SPACES	TOTAL BED SPACES
					GIA (m <sup>2</sup> )		
<b>HOUSES</b>							
A	4 Bed -Terrace (3 storey)	141.2	(120)	11	1553.2	7	77
B	4 Bed -Terrace (3 storey)	154.9	(120)	15	2323.5	7	105
C	4 Bed -Terrace (2 storey)	138.4	(116)	11	1522.4	7	77
D	3 Bed - Terrace (2 storey)	106.6	(92)	46	4903.6	5	230
E	3 Bed - Terrace (2 storey)	109.5	(92)	41	4489.5	5	205
F	3 Bed - Terrace (2 storey)	116.0	(92)	15	1740.0	5	75
<b>TOTAL HOUSES</b>				<b>139</b>	<b>16532.2</b>		<b>769</b>
<b>RESIDENTIAL UNIT TYPE MIX</b>							
	UNIT TYPE			No UNITS	OVERALL (%)		Housing (%)
	3-bed house			102	26.5		73.4
	4-bed house			37	9.6		26.6
	<b>TOTAL UNITS</b>			<b>139</b>			
<b>DUPLEX / APARTMENTS</b>							
J	2 Bed Apartment (1 storey)	85.6 - 87.0	(73)	46	3944	4	184
K	3 Bed Duplex (2 storeys)	117.9 - 119.7	(90)	46	5447	5	230
L	2 Bed Duplex (2 storeys)	113 - 114	(73)	21	2387.5	4	84
M	3 Bed Duplex (2 storeys)	135.5	(90)	21	2844.6	5	105
O	2 Bed Apartment (1 storeys)	79.5	(55)	4	318	4	16
P	3 Bed Duplex (2 storeys)	125.7	(90)	4	502.8	5	20
A1/A2	1 bed/2 people Apartments	48.9 - 53.9	(45 - 49.5)	48	2417	2	96
B1	2bed/3people Apartments	64.2 - 64.7	(63)	20	1290	3	60
B2	2 bed/4people Apartments	81.5 - 81.9	(79 - 80.9)	36	2942.9	4	144
<b>TOTAL DUPLEX / APARTMENTS UNITS</b>				<b>246</b>	<b>22093.8</b>		<b>939</b>
TENANT AMENITY BUILDING				170	170		
<b>DUPLEX / APARTMENTS UNIT TYPE MIX</b>							
	2 Bed Apartment (1 storey)			50	13.0		20.3
	3 Bed Duplex (2 storeys)			71	18.4		28.9
	2 Bed Duplex (2 storeys)			21	5.5		8.5
	1 bed/2 people Apartments			48	12.5		19.5
	2bed/3people Apartments			20	5.2		8.1
	2 bed/4people Apartments			36	9.4		14.6
	<b>TOTAL DUPLEX / APT UNITS</b>			<b>246</b>			
<b>TOTAL (EXTENT OF PROPOSED APPLICATION) *</b>				<b>385</b>	<b>39234</b>		<b>1708</b>
* NOTE - FIGURE SHOWN INCLUDES RESIDENTIAL ACCOMMODATION + AMENITY BUILDING + ANCILLARY ACCOMMODATION							

Figure 3: Extract from Overall Schedule of Areas, prepared by Burke Kennedy Doyle Architects

It can be seen from the above, that the houses, apartments and duplexes proposed in this case generally exceed the ‘minimum’ standards provided for by the Apartment Guidelines (2022) and the Quality Housing for Sustainable Communities (2007).

We refer the Planning Authority to the Schedule of Accommodation (SoA) and Housing Quality Assessment (HQA), together with the House Type and Apartment Block drawings prepared by Burke Kennedy Doyle Architects enclosed with this planning application.

### 5.2.1 Build-to-Rent

The proposed development includes 70no. ‘Build-to-Rent’ duplex / apartments (35no. 2-bedroom units and 35no. 3-bedroom units). These units are located in Terrace in 1, 2, 4, 5 and 6.

We refer the Planning Authority to the Dwg. No. 6268-P-007 ‘Proposed Residential Development Strategy’, prepared by Burke Kennedy Doyle Architects enclosed with this planning application which show the location of the ‘Build-to-Rent’ units in the context of the wider mix of typologies.

### 5.3 Proposed Ancillary Development

The following table identifies the extent of ancillary accommodation envisaged within the scheme.

Class of Development	Gross Internal Area
Tenant Amenity Facility	170 sq. m

The proposed tenant amenity building is located to the east of Apartment Block 2. The Tenant Amenity Building will serve the resident of the scheme.

We refer the Planning Authority to the Dwg. No. 6268-P-710 ‘Tenant Amenity Building’, prepared by Burke Kennedy Doyle Architects enclosed with this planning application for further detail of the proposed Tenant Amenity Building.

**5.4 Design & Layout**

We refer the Planning Authority in the first instance to the Architectural Design Rationale, prepared by Burke Kennedy Architects which sets out the design rationale for the proposed development having regard for the specific context of the site.

The proposed development at this site is the result of carefully considered architectural-led design and in-depth pre-planning consultation with the Planning Authority.



**Figure 4:** Computer Generated Image, prepared by 3D Design Bureau showing an aerial view the proposed development with the permitted road and infrastructure works show.

**Northern Area**

Apartment Block 1 and 2 establishes an urban edge along this portion the R120. The units addressing the road will provide active frontage and improve passive surveillance.

Apartment Block 2 provides a marker building on the junction of the permitted Clonburris Southern Link Street and the R120. The end of the Apartment Block 2 at this junction has been carefully designed to provide a high quality architectural treatment and maintain active frontage.

The scale transitions to 3 storey duplex / apartments immediately east of the Apartment Blocks and steps down further to 2 / 3 storey terraced and semi-detached houses adjacent the attenuation pond permitted under SDCC Reg. Ref. SDZ20A/0021. The houses proposed adjacent the permitted attenuation pond will provide active frontage to this edge of the site.

2no. Terraces of duplex / apartments which are 3 storeys in height address the norther edge of the permitted Clonburriss Southern Link Street. The ground floor units have own door access which will provide activity at street level. A mix of materials and 'bookend' design to the duplex / apartment terraces will provide further animation along the street.

A single storey Tenant Amenity Building is proposed between Apartment Block 2 and Terrace 1 duplex / apartments.

An area along the north and east of the permitted attenuation pond will include landscaping and additional pedestrian / cycle path to connect with the landscape works permitted in this area under SDCC Reg. Ref. SDZ20A/0021. The proposed pedestrian / cycle path will allow connection east back towards the primary cycle / pedestrian infrastructure on the permitted Clonburriss Southern Link Street.

### Southern Area

3no. Terraces of duplex / apartments which are 3 storeys in height establishes an urban edge along this portion the R120. The units have own access through a planted buffer strip adjacent the R120 which will provide activity at street level. The units addressing the road will provide active frontage and improve passive surveillance.



**Figure 5:** Computer Generated Image, prepared by 3D Design Bureau showing scale on the permitted Clonburriss Southern Link Road.

The scale transitions to 2 storey terraced and semi-detached houses adjacent the proposed open space to the east / southeast. The houses proposed onto Local Street 2 and 4 provide an active edge overlooking the proposed public open space.

4no. Terraces of duplex / apartments which are 3 storeys in height address the norther edge of the permitted Clonburriss Southern Link Street. The ground floor units have own door access which will

provide activity at street level. A mix of materials and 'bookend' design to the duplex / apartment terraces will provide further animation along the street.

The proposed public open space will include a series of connected paths to encourage walking and cycling and a small playground. The Griffeen River edge will be enhanced where possible with native planting to integrate the existing natural features.

A high-quality palette of materials are proposed on the apartment buildings which will also add to character and distinctiveness of the proposal. We refer the Planning Authority to the Architectural Design Rationale and Elevation Drawings, prepared by Burke Kennedy Doyle Architects which provide further detail on the material proposed.

## 5.5 Sunlight and Daylight Assessment

We refer the Planning Authority to the accompanying Daylight & Sunlight Analysis, prepared by IN2 Engineering Design Partnership, which provides an analysis of daylight and sunlight that would be available to the proposed development.

The analysis determined that 98.5% of Kitchen / Living / Dining (KLD) spaces, living rooms and bedrooms would achieve or exceed BRE guidance targets. This provides for an excellent level of amenity value within the development as a whole. It is noted that a total of 12no. units have been determined to be non-compliant, so compensatory measures have been introduced for these units applying the precautionary approach.

We refer the Planning Authority to Section 6.4.4 of this Report which discussed compliance with the Apartment Guidelines (2022).

## 5.6 Residential Density

The proposed development of 385no. units on a net site area of c. 7.43 Ha. achieves a net residential density of 51.2no. units per Ha. This is above the minimum requirement of 50no. units per Ha outlined in the Development Plan and falls within the acceptable density range (43no. units per Ha to 53no. units per Ha) for the Adamstown Extension Development Area as prescribed in the Planning Scheme.

## 5.7 Landscape Proposals

The landscape proposal has been designed by Brady Shipman Martin Landscape & Built Environment Consultants. The landscape proposals have regard to the provisions of the Planning Scheme. The proposed landscape scheme is a key component of the integration of the new building environment with the existing and permitted landscape conditions. The key landscape features include: -

- A range of spaces will be provided to allow opportunities for passive and active recreation. The primary open space provision is located to the east of the development adjacent the Griffeen River.
- Provision of play features for a variety of ages groups, with a mix of both formal and informal natural play.
- The design of streets will enhance the experience of pedestrians and modes of active travel.
- The Griffeen River corridor will be managed for biodiversity – planting will be enhanced where necessary, and a dark corridor will be maintained for bats.
- The layout will provide for an off-road shared cycle routes across the site where feasible.



**Figure 6:** Extract from the Landscape Masterplan Drawing, prepared by Brady Shipman Martin Landscape & Built Environment Consultants

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail on the landscaping proposals.

**Connections / Permeability**

An internal network has been developed with the aim of maximising travel by walking, cycling and public transport. The walking and cycling network link back to the permitted Clonburriss Southern Link Street (SDCC Reg. Ref. SDZ20A/0021 refers) which provides wider access west toward Adamstown and east towards the remainder of the Clonburriss SDZ lands.

New connections are created onto the R120 in the southern area of the proposed development. It has not been possible to create similar connections onto the R120 in the northern area of the proposed development due to the change in levels with the R120 rail bridge (See further discussion in Section XX of this Report and in the Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants).



**Figure 7:** Extract from the Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants showing site connectivity.

**Boundary Treatments**

- **Northern Boundary (with Rail Line)**

The existing hedgerow along the northern boundary will be enhanced with additional native shrub and tree planting to increase the width and further screen the development from the adjacent railway.

- **Southern Boundary (with Lucan Pitch & Putt)**

A portion of the southern boundary adjoins Lucan Pitch and Putt course. The existing fenceline and security fence will be preserved and ball netting introduced to provide a safety barrier for the development.

We refer the Planning Authority to the Boundary Treatment Drawing and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail in relation to the boundary treatments proposed across the proposed development.

**5.8 Arboriculture**

We refer the Planning Authority to the Tree Survey and Planning Report and associated Arborist Drawings, prepared by Independent Tree Surveys Ltd. that are enclosed with this planning application.

It is generally concluded that the overall arboricultural impact of this development will be low and that the planting of new trees across the development in accordance with the new landscape plans will help mitigate the loss of sections of hedgerow and individual trees that are being removed to facilitate the development.

## 5.9 Public Lighting & Site Services

We refer the Planning Authority to the Outdoor Lighting Report and Public Lighting Layout Plans, prepared by Sabre Electrical Services Ltd. The public lighting proposals have been designed with due regard to public safety and the creation of welcoming streets and spaces.

The public lighting layout has been co-ordinated with the landscaping scheme presented by Brady Shipman Martin Landscape & Built Environment Consultants. Furthermore, due consideration has been given to the potential ecological impact of the lighting scheme proposed. The potential impact is fully considered as part of the Ecological Impact Assessment, prepared by Brady Shipman Martin Landscape & Built Environment Consultants.

## 5.10 Landscape and Visual Impact Assessment

A Landscape and Visual Impact Assessment prepared by Brady Shipman Martin Landscape & Built Environment Consultants is enclosed with this planning application. This assessment concludes that there are no significant residual effects expected from the proposed development.

## 5.11 Water Services

We refer the Planning Authority to the Engineering Assessment Report and the Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers for full details on the proposed water services.

### 5.11.1 Water Supply

Water will be supplied to the proposed development via 8no. connections to the permitted watermain networks as per SDCC Reg. Ref. SDZ20A/0021. 3no. connections will serve the development to the north of Hayden's Lane and 5no. connections serving the lands to the South.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for water supply.

### Wastewater

It is proposed to drain wastewater from the proposed development via a network of foul gravity sewers which flow to a network in Hayden's Lane as permitted under SDCC Reg. Ref. SDZ20A/0021. There will be a total of 2no. connections from the proposed development to the permitted infrastructure, 1no. connection from the North of Hayden's Lane and 1no. from the South of Hayden's Lane.

We refer the Planning Authority to Drawing Nos. P1201 and P1202 Drainage Layout Sheets 1 and 2, prepared by Waterman Moylan Consulting Engineers, which show the proposed foul drainage layout.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for wastewater connection subject to certain upgrade works.

The required upgrade works for part of the permitted roads and drainage infrastructure works (SDCC Reg. Ref. SDZ20A/0021 refers). Works on the roads and drainage infrastructure are due to commence in 2023.

### Surface Water

It is proposed to drain surface water from southern area via 4no. connections to the permitted surface water network. From where it will discharge to the permitted attenuation pond.

For the norther area it is intended to discharge directly to the permitted attenuation pond (immediately east). This will require a minor amendment to the attenuation pond permitted under SDCC Reg. Ref. SDZ20A/0021 to include a new outfall headwall into the pond (northwest area).

The Sustainable Urban Drainage Strategy (SuDS) strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed, on and around the apartment blocks (source controls), include the following: -

- Permeable paving.
- Filter drains.
- Green / Sedum roofs.

SuDS measures proposed, within the wider application site (site controls), include the following: -

- Roadside Bio-retention Tree Pits.
- Swales

Regional controls will be provided by the infrastructure permitted under SDCC Reg. Ref. SDZ20A/0021 refers which has been sized and designed in anticipation of the subjection application. This permitted infrastructure includes an attenuation pond, a flow control device, and a petrol interceptor.

We refer the Planning Authority to Section 3.4 of the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers for further information.

The SuDS measures proposed have been co-ordinated with the landscaping scheme presented by Brady Shipman Martin Landscape & Built Environment Consultants.

### **Flood Risk**

We refer the Planning Authority to the Flood Risk Assessment, prepared Waterman Moylan Consulting Engineers. This concludes that there is a low risk of flooding.

## **5.12 Transportation**

We refer the Planning Authority to the Traffic & Transport Assessment and the Travel Plan, prepared by Waterman Moylan Consulting Engineers, which sets out how the proposed development would address traffic and transportation issues, including road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

### **5.12.1 Access / Layout**

Vehicular access to the proposed development site will be provided from the R120 onto the permitted Clonburris Link Street (SDCC Reg. Ref. SDZ20A/0021 refers). The proposed development also includes a number of internal roads providing vehicular, pedestrian and cycle access design in accordance with the Design Manual for Urban Roads and Streets (DMURS).

We refer the Planning Authority to the Road Drawings, prepared by Waterman Moylan Consulting Engineers for further detail in this regard.

We refer the Planning Authority to the Design Rationale, prepared by Burke Kennedy Doyle Architects which details how the proposed streets generally accord with the road hierarchy and typologies set out in Section 2.2.4 of the Planning Scheme. This is discussed further in Section 8.2 of this Report.

### **5.12.2 Car Parking**

The proposed development includes the provision of 538no. car parking spaces which are provided mainly at street level (in curtilage and on-street) and a portion in the undercroft of the Apartment Blocks.

94no. on-street car parking spaces are provided for Electric Vehicles. 100% of in curtilage car parking has future provision of EV car charging.



We refer the Planning Authority to the Dwg. No. 6268-P-008 'Proposed Parking Strategy Plan', prepared by Burke Kennedy Doyle Architects which identifies the locations of these spaces. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of spaces provided for houses and apartment / duplexes.

### **5.12.3 Bicycle Parking**

The proposed development includes the provision of 878no. bicycle parking spaces. Long term bicycle parking for all units will be provided in secure areas within the apartment block undercroft areas or dedicated stores located conveniently adjacent apartment / duplexes or terraced houses. Semi-detached house with access to rear garden can adequately provide bicycle storage. The short term visitor bicycle parking will be provided by stands / shelters within the public realm in locations which are overlooked for safety and encourage their use. Spaces for Electric Bicycles are also provided across the site.

We refer the Planning Authority to the Dwg. No. 6268-P-008 'Proposed Parking Strategy Plan', prepared by Burke Kennedy Doyle Architects which identifies the locations of bicycle parking facilities. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of spaces provided for houses and apartment / duplexes.

### **5.13 Energy Statement**

An Energy Efficiency and Climate Change Adaptation Design Statement, prepared by Waterman Moylan Consulting Engineers is enclosed with this planning application. This analysis determined an energy and servicing strategy to enable compliance with the standards set out under the Building Regulations Part L 2021.

### **5.14 Taking in Charge**

We refer the Planning Authority to Dwg. No. 6268-P-005 'Taking in Charge Plan', prepared by Burke Kennedy Doyle Architects which identifies the areas of the proposed development to be taken in charge by SDCC.

### **5.15 Resource Waste Management Plan**

A Resource Waste Management Plan prepared by AWN Consulting Ltd is enclosed with this application. The proposed demolition are relatively minor, consisting of the demolition of remaining walls and hard standing associated with a former agricultural building on site. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

### **5.16 Operational Waste Management Plan**

An Operational Waste Management Plan prepared by AWN Consulting Ltd is enclosed with this application. This plan provides a strategy for storing, handling, collecting and transporting wastes generated at the subject site in accordance with the current legal and industry standards. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible, and provides guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution. The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

### **5.17 Inward Noise Assessment**

We refer the Planning Authority to the Noise Impact Assessment, prepared by RSK Ireland Limited. The assessment generally concludes that site is suitable for a residential development, subject to the provision of the noise control recommendations including specific glazing and ventilation.

### **5.18 Building Lifecycle Report**

A Building Lifecycle Report, prepared by SCD Consulting is enclosed with this planning application. This Report contains an initial assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of making the planning application. On foot of this assessment, the Applicant proposes specific measures (contained in the Report) to effectively manage and reduce costs for the benefit of residents.

### **5.19 Demolition**

The proposed development includes the demolition of remaining walls and hardstanding associated with a former agricultural building. We refer the Planning Authority to Dwg. No. 6268-P-009 'Demolitions Drawing', prepared by Burke Kennedy Doyle Architects showing the extent to the demolition to occur.

### **5.20 Part V**

A Part V Proposal, prepared by the Applicant is enclosed with this planning application which sets out how Part V obligations are to be addressed (provision of 39no. units).

Also enclosed is a Part V Validation Letter issued by SDCC in respect of the enclosed Part V Proposal.

## 6 STRATEGIC PLANNING CONTEXT

The application site lies within the boundaries of the area covered by the Clonburris Strategic Development Zone Planning Scheme, 2019 (“the Planning Scheme”).

Section 6 of this Report will highlight this proposed development’s compliance with strategic planning documents. Furthermore, Section 7 of this Report details the compliance of the proposed residential development with the South Dublin County Development Plan 2022 – 2028 (“the Development Plan”). Section 8 of this Report then details the compliance of the proposed development with regard to the Planning Scheme.

### 6.1 National Planning Framework – Ireland 2040

The National Planning Framework (NPF) marks a shift away from allowing urban sprawl, to more brownfield and infill urban development, focussed on integrated investment in and use of quality public transport focussed development and other essential services, to deliver a denser and sustainably compact urban form.

The delivery of the significant transport projects within the Greater Dublin Area is identified as a “Key Growth Enabler” in terms of Dublin meeting its growth targets. Specifically, the NPF confirms this key growth enabler to be: -

*“Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the Luas green line link to Metro Link.”*

The NPF has strategic high level objectives regarding progressing the sustainable development of new greenfield areas for housing, particularly those that are on public transport corridors, such as Clonburris. The NPF recognises the importance of new development within Clonburris and has noted a Clonburris as a key future growth enable noting:

*“Progressing the sustainable development of **new greenfield areas for housing, especially those on public transport corridors** such as Adamstown, Cherrywood, **Clonburris** and Clongriffin.”*

[Emphasis added by SLA]

The NPF also sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered. Objective 72a requires Planning Authorities to apply a standardised tiered approach to zoning of land and Appendix 3 of the NPF ‘A Methodology for a Tiered Approach to Land Zoning’ sets out a two-tier approach to land use zoning. The following is set out in relation to Tier 1: Serviced Zoned Land: -

**“Tier 1: Serviced Zoned Land**

*This zoning comprises lands that are **able to connect to existing development services**, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which **there is service capacity available**, and can therefore accommodate new development.*

*These lands will **generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands**. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

*Inclusion in Tier 1 will generally require the lands to be **within the footprint of or spatially sequential within the identified settlement**.”*

[Emphasis added by SLA]

The NPF also sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered. In the context of this proposal, it is considered that the following particular NPOs are worthy of mention: -

**National Policy Objective 2a**

*“A target of half 50% of future population and employment growth will be focused in the existing five Cities and their suburbs.”*

**National Policy Objective 11**

*"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

**National Policy Objective 13**

*"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment".*

**National Policy Objective 27**

*"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

**National Policy Objective 33**

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

The proposed development is consistent with the NPF promotion of delivering sustainable housing at appropriate densities, at well-connected suburban sites, which are zoned for residential development and fully serviceable.

The proposed development will provide additional amenities including a significant quantum of public open spaces which will support greater connectivity to the surrounding areas. The provision of residential development in along public transport corridors will support the sequential and consolidated development of the Greater Dublin Area.

## 6.2 Eastern and Midlands Regional Spatial & Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the East and Midlands (including the Dublin Metropolitan Area Strategic Plan – MASP) came into effect on 28 June 2019. This provides regional level strategic planning policy for the eastern and midland region, and Dublin, in line with the NPF. Dublin comprises Dublin City and Metropolitan Area.

This document sets out the regional level strategic planning policy for the eastern and midland region, and Dublin Metropolitan Area, in line with the national strategy and policy objectives for managing housing and employment development to support projected population growth set out in the NPF.

Strategic residential and employment development corridors are identified in the DMASP. The South-West Corridor Strategic Development Areas along the Kildare line includes DART upgrades to Cellbridge-Hazelhatch (this includes Adamstown and Kishoge (Clonburris)).

### South-West Corridor

The Clonburris lands are noted within the South-West strategic corridor within the Dublin MASP. The Dublin MASP provision for the South-West Corridor reads: -

*"The consolidation of the western suburbs of Clonburris, Kilcarbery and Adamstown, linked to increased capacity and electrified services on the Kildare line, to be delivered by 2027, and at Grangecastle supported by additional bus connections. Brownfield regeneration lands at Naas Road and Tallaght and new residential communities at Fortunestown, supported by the LUAS redline."*

**[Emphasis added by SLA]**

The Planning Scheme plays an important role in the consolidation of the South-West Corridor. The proposed residential development is oriented towards transport links, and is well connected to its broader context, including the Grand Canal greenway / blueway and the residential, commercial and public transport provisions in Adamstown.

Regional Policy Objective (RPO) 5.3 states: -

*“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.”*

The proposed development enables multi-modal and sustainable movement through the provision of inter-connected pedestrian and cycle paths that are easily accessible to regional transport links including the Grand Canal greenway and the Adamstown Station on the Kildare. Rail Line.

RPO 5.5 states: -

*“Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

The proposed mix of housing type and tenure is focused on fulfilling the density requirements prescribed in the Planning Scheme with regard to housing quality and neighbourhood design, accessibility and movement.

RPO 5.7 and 5.8 relating to Green Infrastructure states: -

*“RPO 5.7: Co-ordinate across local authority boundaries to identify, manage, develop and protect regional Green Infrastructure, to enhance strategic connections and develop a Green Infrastructure policy in the Dublin Metropolitan Area.”*

*“RPO 5.8: Support the promotion and development of greenway infrastructure and facilities in the Dublin metropolitan area and to support the expansion and connections between key strategic cycle routes and greenways as set out in the NTA Greater Dublin Area Cycle Network Plan.”*

We refer the Planning Authority to the Landscape Masterplan and Landscape Design Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants. The site’s landscape design integrates with the surrounding permitted green infrastructure (SDCC Reg. Ref. SDZ20A/0021 refers).

Overall, the proposed development is consistent with the RSES and DMASP promotion of sustainable residential neighbourhood growth to consolidate the western suburbs of Clonburris.

### 6.3 Transport Strategy for the Greater Dublin Area 2022 – 2042

The Transport Strategy for the Greater Dublin Area 2022 – 2042 provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. The strategy is based on national policies on sustainability as set out in the climate action and low carbon legislation and in climate action plans. It also provides a transport planning policy around which other agencies involved in land use planning, environmental protection and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential strategic component in the orderly, integrated development of the GDA over the next 20 years.

A number of key transportation proposal underpin the GDA Transport Strategy including but not limited to: -

- **Dart + South West** (currently under tender process for construction phase) this includes electrification of the Kildare Line from Dublin Heuston to Hazelhatch-Celbridge.
- **Bus Connects** – a ‘Core Bus Network’ for the region comprising: -
  - 16no. radial bus corridors.
  - 3no. orbital bus corridors.
  - 6no. regional bus corridors

The Dart+ South West will provide the application site with a sustainable public transport option as it includes both Adamstown and Kishoge stations. Both are within reasonable walking distance from the proposed development. Kishoge train station is due to open in late 2023, this station is approximately 1.2km from the proposed development. We note the proposed development is not directly located on a proposed Bus Connects route however there will be a number of spine routes located within walking distance from the application site.

Overall, the proposed development is consistent with national policy in terms of land use and transportation integration by providing residential development in close proximity to existing public transport corridors. In the case of the application site the adjacent public transport is to be upgraded to DART standard which will significantly increase capacity and frequency.

## 6.4 Section 28 Ministerial Guidelines

The following Statements of Consistency sets out how the proposed development is consistent with the Section 28 Ministerial Guidelines.

### 6.4.1 Sustainable Residential Guidelines in Urban Areas (Cities, Towns, Villages) (2009)

Section 5.8 of the Sustainable Residential Development in Urban Areas Guidelines (2009) sets out that sites greater than 0.5 Ha and within 1km of a rail / light rail station are expected to achieve minimum residential density of 50no. units per Ha.

In terms of the calculation methodology for gross versus net density, Appendix A of the Guidelines sets out the methodology for the calculation of Gross and Net density which are set out as follows: -

#### **Gross Density**

*"A gross density measure is best applied to estimating overall land areas required for mixed use developments".*

#### **Net Density**

*"A net site density measure is a more refined estimate than a gross site density measure and includes only those areas which will be developed for housing and directly associated uses. These will include: -*

- *Access roads within the site.*
- *Private garden space.*
- *Car parking areas.*
- *Incidental open space and landscaping.*
- *Children's play areas where these are to be provided.*

*It therefore excludes: -*

- *Major and local distributor roads.*
- *Primary Schools, Churches, Local Shopping etc.*
- ***Open spaces serving a wider area.***
- ***Significant landscape buffer strips."***

**[Emphasis added by SLA]**

From this it is reasonable to conclude that the proposed public open space and landscaped buffer areas serving the local / wider community (i.e. not incidental spaces) can be excluded for the purposes of calculating net residential density.

The proposed development of 385no. units on a net site area of c. 7.43 Ha. achieves a net residential density of 51.2no. units per Ha. This is above the minimum requirement of 50no. units per Ha outlined in the Development Plan and falls within the acceptable density range (43no. units per Ha to 53no. units per Ha) for the Adamstown Extension Development Area as prescribed in the Planning Scheme.

Furthermore, future development of the Lucan Pitch & Putt lands has been considered in terms of potential density achieved. We refer to the Planning Authority to Dwg. No 6268-P-003 ‘Proposed Master Plan’, prepared by Burke Kennedy Doyle Architects. The layout provides for an additional c. 88no. unit on the Lucan Pitch & Putt lands (indicative layout only) to demonstrate that a nett density of c. 51no. units per Ha can be achieved. As such, the future potential development of Lucan Pitch & Putt lands would continue to meet the required density set out in both the Development Plan, Planning Scheme and national guidance.

**6.4.2 Urban Design Manual – A Best Practice Guide (2009)**

The following table provides an overview of the ‘12 Design Criteria’ contained within the Urban Design Manual (2009), which are relevant to the proposed development. A response as to how the proposed development adheres to each of the criteria is also set out.

Furthermore, we refer the Planning Authority to the accompanying Design Rationale, prepared by Burke Kennedy Doyle Architects, which sets out a more detailed response to each of the 12 Design Criteria.

Criteria	Applicant’s Response
<p><b>1. Context</b></p>	<ul style="list-style-type: none"> <li>• The proposed development is in the Adamstown Extension zone of the Clonburris SDZ, designed to mesh with the design, densities, and uses of Adamstown SDZ to the north.</li> <li>• The proposed building heights generally adhere to the provision of the Planning Scheme. Building heights decrease as you move towards sensitive boundaries and away from the existing Rail Station – i.e. reducing to 2 storeys towards the southern boundary.</li> <li>• Existing site boundaries treatments will be retained and trees of merit within existing hedgerows on-site are being retained where feasible.</li> <li>• The design and layout of the proposal acknowledges Canal, Park, and Rail Frontages of residential buildings as identified in the Planning Scheme.</li> </ul>
<p><b>2. Connections</b></p>	<ul style="list-style-type: none"> <li>• The principal street of the design has been previously permitted and is now under construction. The Clonburris Southern Link Street connects the application site to R120 Regional Road to the west and the rest of Clonburris SDZ to the east.</li> <li>• The street layout is designed to provide a well-defined urban building block layout, while respecting the existing natural tree and hedgerow lines. This block layout provides a grid of simple and legible secondary streets, promoting connectivity through the scheme and into the surrounding areas.</li> <li>• A dedicated cycle way is being provided east/west along the Clonburris Southern Link Street which will provide a link between the proposed development and the rest of Clonburris to the east. The cycle way will also connect to R120 to the west, which connects immediately to Adamstown to the north.</li> <li>• The internal connecting cycle / walking routes will encourage and facilitate more walking and cycling within the proposed development.</li> <li>• The proposed development is located within 1.8km of Adamstown Station which is approximately 20 minutes walking distance from the western most part of the proposed development.</li> </ul>
<p><b>3. Inclusivity</b></p>	<ul style="list-style-type: none"> <li>• A holistic approach has informed the design, including architecture, landscaping, servicing, drainage, sustainable transportation, and energy management with the intention of delivering a healthy, integrated and natural urban environment, fostering a sense of community.</li> <li>• The proposed units are designed to provide high quality homes and choice to the full range of prospective purchasers. The development is also focused on providing homes in the immediate future to match the aspirations set out in ‘Rebuilding Ireland’ to increase provision.</li> <li>• The scheme is fully compliant with Part M of the Building Regulations.</li> <li>• The overall landscape approach is to provide a variety of hard and soft landscaped spaces (including play areas) that create a high quality public realm.</li> <li>• The public spaces are legible which is further assisted by the connectivity of the linear spaces which allows the user to intuitively navigate the entire scheme.</li> </ul>

	<ul style="list-style-type: none"> <li>• There is a provision of a children’s open space and playground.</li> <li>• Provision has been made within the Masterplan for Woodbrook to provide an appropriately scaled Tenant Facility which will provide an amenity for the neighbourhood. The local centre also provides a civic space.</li> </ul>
<b>4. Variety</b>	<ul style="list-style-type: none"> <li>• There is a range of apartments, duplexes and houses (detached, semi-detached and terraced) in 1 bed, 2 bed, 3 bed, and 4 bed formats in buildings ranging in height from 2 to 6 storeys. The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.</li> <li>• A range of public open spaces will also be provided. In addition, pathways and cycle ways are provided through the development.</li> </ul>
<b>5. Efficiency</b>	<ul style="list-style-type: none"> <li>• The site will achieve a net density of c. 51.8no. units per Ha, where the min–max range is 43 – 53no. units per HA as prescribed in the Planning Scheme.</li> <li>• The proposed layout incorporates existing natural features into the new network of green spaces and green loops, in order to make efficient use of existing landscape features in achieving the required open space provision.</li> <li>• The scheme is landscaped to ensure that the public open spaces benefit from the best solar orientation.</li> <li>• All dwellings within the proposed development will be constructed to meet the current Part L Building Regulation with regard energy efficiency.</li> <li>• The layout of the proposed development will optimise orientation to minimise the provision of north facing gardens / balconies / terraces thus optimising the benefits of passive solar gain for individual units.</li> </ul>
<b>6. Distinctiveness</b>	<ul style="list-style-type: none"> <li>• The proposed residential development makes up part of the Adamstown Extension ‘Development Area’ which incorporates differentiating building forms, material finishes and landscape layout to provide interest and variety.</li> <li>• The proposed Apartment Block will add distinction in terms of form, finishes and architectural quality. The block is framed at the end of the Clonburris Southern Link Street running north / south will provide a feature within the wider setting of the scheme for those walking / cycling toward Adamstown SDZ, for example.</li> <li>• The street hierarchy of formal avenues and side streets will further enhance the sense of place within each character area.</li> </ul>
<b>7. Layout</b>	<ul style="list-style-type: none"> <li>• The proposed layout is arranged as a series of well-defined urban blocks and streets set into a structure of green open spaces and green links. The streets are arranged in a hierarchy of street types, formal avenues, and side streets with no dead-end cul-de sacs.</li> <li>• The building types are arranged to create an organised hierarchy of scales appropriate to their particular locations. A range of dwelling types is proposed, with a well-integrated tenure mix.</li> <li>• The scheme encourages walkability and provides the necessary desire lines within the site to allow users ease of access across the scheme.</li> <li>• The internal road network is designed to reduce the dominance of cars and encourage an environment that is pedestrian friendly.</li> <li>• The orientation and layouts of residential units ensures that all roads and public spaces benefit from passive surveillance.</li> <li>• The street network is designed to adhere to the provisions set out in the Design Manual for Urban Roads and Streets (2013). It is intended that the road layout supports a reduction the primacy of car usage, making it more conducive for those who wish to walk or cycle.</li> <li>• Street trees are provided along the network of streets in order to create people friendly places with distinctive character to aid legibility.</li> </ul>
<b>8. Public Realm</b>	<ul style="list-style-type: none"> <li>• All public and communal spaces within the scheme are more than adequately overlooked.</li> <li>• The public open spaces are an integrated feature of the design that allow users to naturally traverse the subject site without unnecessary barriers or dead ends.</li> <li>• The layout of the proposed development maximises the use of passive surveillance. Public open space and dedicated cycle / walking routes benefit from passive surveillance which will encourage their use and provide an effective deterrent for anti-social behaviour.</li> <li>• Parking is provided in a range of conditions including on curtilage of dwelling, banked on street parking, grouped courtyard or podiums and parking has been integrated</li> </ul>



	<p>with the overall landscape treatment and ‘softened’ where possible with planting and other landscaping features.</p>
<b>9. Adaptability</b>	<ul style="list-style-type: none"> <li>• The proposed units meet appropriate accessibility standards and are capable of internal modification to meet changing household needs. A number of house type have been included with optional extensions to ensure a range of options are available to prospective owners.</li> <li>• The scheme includes a range of energy efficient measures that assist in reducing the overall carbon footprint of the scheme over its lifetime.</li> <li>• A Building Lifecycle Report will set out how the apartment blocks are managed and maintained efficiently.</li> <li>• All units within the proposed development have been designed to meet Part L energy efficiency standards.</li> <li>• External materials have been selected to ensure longevity and minimal maintenance, the selected materials allow for future additions or changes to be readily constructible.</li> <li>• All private open spaces including rear gardens, communal spaces and private balconies meet the requirements of the Development Plan.</li> </ul>
<b>10. Privacy &amp; Amenity</b>	<ul style="list-style-type: none"> <li>• Each unit will have access to dedicated private open space that meets the standards of the Quality Housing Guidelines (2007) and the Apartment Guidelines (2022).</li> <li>• Over 50% of the proposed apartment and 100% of the duplex units within the proposal are dual aspect.</li> <li>• Units will be laid out and orientated toward all major open spaces area to ensure that passive surveillance is maximised.</li> <li>• Storage space will be provided within all units and will meet the requirements of the Development Plan and the Apartment Guidelines (2022).</li> </ul>
<b>11. Parking</b>	<ul style="list-style-type: none"> <li>• Car parking is integrated into the layout of residential streets with additional visitor parking also provided for.</li> <li>• Car parking is provided adjacent to all duplex on-street courts and apartments at podium and street level.</li> <li>• Bicycle storage will be provided for all apartment and duplexes to meets the requirements of the Apartment Guidelines 2022.</li> <li>• Bicycle storage will be catered for in communal bike stores integrated into the local street to serve mid-terrace houses, or, in the case of the apartments, bike parking has been provided within the podium parking areas or at grade in the immediate vicinity for visitors.</li> </ul>
<b>12. Detailed Design</b>	<ul style="list-style-type: none"> <li>• The building forms are designed to create clear, legible and well-defined street blocks. Street corners are designed with windows onto both sides of each corner, ensuring good animation and levels of passive overlooking consistently throughout the development.</li> <li>• The building heights proposed respond to the context of the site. Clonburris Southern Link Street is lined to by 3 storey building providing a sense of enclosure.</li> <li>• The higher densities of the proposed development are focused along the R120 Regional Road which connected the Clonburris SDZ to the Adamstown SDZ via the Rail Line overpass.</li> <li>• The selection of materials and the elevational treatments are designed to deliver a sense of urban quality, and particular care has been taken to ensure a coherency of elevation treatment.</li> <li>• A wide range of house, duplex and apartment types are proposed to deliver a sustainable housing mix. Each unit type has been carefully designed to achieve the unit and individual room dimension requirements within an efficient plan form.</li> <li>• All of the apartment blocks have been oriented to maximise access to daylight / sunlight. The majority of apartment units are dual aspect.</li> <li>• The overall layout is permeable and improves walkability and connectivity.</li> <li>• The open spaces are designed to be accessible, encourage active use and positive visual amenity within the overall scheme.</li> <li>• A high quality landscape approach using a mixture of paving, textured finishes, and planting to provide a public realm that is aesthetically pleasing, functional and practical in terms of facilitating maintenance.</li> <li>• Car parking within the local streets has been carefully managed to ensure it does not dominate the streetscape.</li> </ul>

### 6.4.3 Quality Housing for Sustainable Communities (2007)

In the case of these Quality Housing Guidelines, there are no specific objectives, or policies set out in which to refer to. As a result, we have identified the aspects of the Guidelines we feel are most relevant and identified a response. Having regard for Table 5.1 of the Guidelines (below) with regard the space provision and room sizes for typical dwellings, all houses within a proposed development must adhere to these standards.

Table 5.1: Space provision and room sizes for typical dwellings

DWELLING TYPE	TARGET GROSS FLOOR AREA (m <sup>2</sup> )	MINIMUM - MAIN LIVING ROOM (m <sup>2</sup> )	AGGREGATE LIVING AREA (m <sup>2</sup> )	AGGREGATE BEDROOM AREA (m <sup>2</sup> )	STORAGE (m <sup>2</sup> )
<b>Family Dwellings - 3 or more persons</b>					
4BED/7P House (3 storey)	120	15	40	43	6
4BED/7P House (2 storey)	110	15	40	43	6
4BED/7P House (1 storey)	100	15	40	43	6
4BED/7P Apartment	105	15	40	43	11
3BED/6P House (3 storey)	110	15	37	36	6
3BED/6P House (2 storey)	100	15	37	36	6
3BED/6P House (1 storey)	90	15	37	36	6
3BED/6P Apartment	94	15	37	36	10
3BED/5P House (3 storey)	102	13	34	32	5
3BED/5P House (2 storey)	92	13	34	32	5
3BED/5P House (1 storey)	82	13	34	32	5
3BED/5P Apartment	86	13	34	32	9
3BED/4P House (2 storey)	83	13	30	26	4
3BED/4P House (1 storey)	73	13	30	26	4
3BED/4P Apartment	76	13	30	26	7
2BED/4P House (2 storey)	80	13	30	25	4
2BED/4P House (1 storey)	70	13	30	25	4
2BED/4P Apartment	73	13	30	25	7
2BED/3P House (2 storey)	70	13	28	20	3
2BED/3P House (1 storey)	60	13	28	20	3
2BED/3P Apartment	63	13	28	20	5
1BED/2P House (1 storey)	44	11	23	11	2
1BED/2P Apartment	45	11	23	11	3

Figure 8: Extract form Table 5.1 of the Quality Housing for Sustainable Communities Guidelines (2007)

All of the houses proposed are significantly in excess of the minimum size requirements of the Housing Guidelines (2007). We refer the Planning Authority to the HQA, prepared by Burke Kennedy Doyle Architects which confirm this.

### 6.4.4 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022)

The Guidelines contain a number of ‘Specific Planning Policy Requirements’ (SPPR). These specific planning policy requirements contained in these new Guidelines take precedence over policies and objectives of development plans, local area plans and strategic development zone planning schemes.

The Apartment Guidelines recognise that the population and housing targets set out by the NPF will necessitate “a significant and sustained increase in housing output and apartment type development in particular”

The Guidelines address the requirement identified in the NPF to put in place Section 28 Ministerial Guidelines to improve the evidence base planning guidance for housing provision that meets local housing need. The need to accommodate one, two and three person households in urban locations is identified in the Apartment Guidelines.

6.4.4.1 Apartment Mix (SPPR 1)

*Specific Planning Policy Requirement 1 of the Apartment Guidelines, states: -*

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

The proposed development is compliant with SPPR 1 of the Apartment Guidelines as no more than 50% of the proposed units are one-bedroom. There are no studio units proposed.

The proposed unit mix of 1-bed, 2-bed and 3-bed units is supported by the guidance and SPPRs set out in the Apartment Guidelines, which specify that no minimum requirement shall apply in respect of the provision of apartments with three or more bedrooms. 72no. duplex / apartment units with three or more bedrooms are proposed making up c. 18.4% of the overall mix of units.

6.4.4.2 Apartment Floor Area (SPPR 3)

*Specific Planning Policy Requirement 3 that the following minimum floor areas are achieved for apartments: -*

Minimum Apartment Floor Areas	
Studio (1 person)	37 sq. m
One bedroom (2 person)	45 sq. m
Two bedroom (3 person)	63 sq. m
Two bedroom (4 person)	73 sq. m
Three bedroom (5 person)	90 sq. m

All apartments in the proposed development will meet the minimum floor area requirements set out the Guidelines. A HQA, prepared by Burke Kennedy Doyle Architects, confirms this. The Table below highlights the difference in size of the units when compared to the minimum standards.

Apartments / Duplexes			
Unit Type	No. of Units	GFA (m <sup>2</sup> ) / Unit	Min. Size – Guidelines 2022
1 Bed Apartment – 2 Person	48	48.9 – 55.2	45
2 Bed Apartment – 3 Person	20	66.8	63
2 Bed Apartment – 4 Person	36	87.3 – 87.8	73
2 Bed Duplex	21	114	73
3 Bed Duplex	71	119.4 – 132.5	90
2 Bed Apartment / Duplex	50	77.2 - 87	73
<b>Total</b>	<b>246</b>		

\* **Net Internal Area** (i.e. floor area of apartments only – omitting circulation areas etc. within apartment blocks).

### Safeguarding Higher Standards

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

All apartments in the proposed development will meet the floor area requirements set out the Guidelines. A HQA, prepared by Burke Kennedy Doyle Architects, is contained in in this application for reference which shows the vast majority of the units are 10% of greater than the minimum size required.

#### 6.4.4.3 Dual Aspect (SPPR 4)

*Specific Planning Policy Requirement 4* sets out that the minimum number of dual aspect apartments that may be provided in any single apartment scheme. In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

SPPR4 of the Apartment Guidelines states: -

*"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: -*

*(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations....*

***(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***

*(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion ..."*

**[Emphasis added by SLA]**

The site is considered a suburban or intermediate location in the context of the Apartment Guidelines. Over 50% of the proposed apartment and 100% of the duplex units within the proposal are dual aspect. A HQA, prepared by Burke Kennedy Doyle Architects, shows the proportion of dual aspect apartments.

#### 6.4.4.4 Floor to Ceiling Height (SPPR 5)

The Guidelines advise that the minimum floor to ceiling height must accord with the Building Regulations requirement of 2.4m. However, *Specific Planning Policy Requirement 5* (SPPR 5) sets out that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.

SPPR5 states: -

*"Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."*

As illustrated on the Duplex Block Section Drawings prepared, by Burke Kennedy Doyle Architects, the ground floor duplex / apartments have a floor to ceiling height of 2.7m, thus complying with the above standard. The Apartment Blocks do not include ground floor apartment.

#### 6.4.4.5 Lift and Stair Core (SPPR 6)

As per the Apartment Guidelines, up to 12no. apartments per floor per individual stair / lift core may be provided in apartment schemes under *Specific Planning Policy Requirement 6*.

The proposed development complies with SPPR 6 of the Apartment Guidelines. The apartments have been designed to a maximum of 12no. units per core.

We refer the Planning Authority to the Apartment Floor Plans prepared by Burke Kennedy Doyle Architects for further details.

6.4.4.6 Other Design Standards for New Apartments

**Private & Communal Open Space**

As per the Guidelines, the minimum requirement for private amenity space is as follows: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq. m
One bedroom	5 sq. m
Two bedroom (3 person)	6 sq. m
Two bedroom (4 person)	7 sq. m
Three bedroom	9 sq. m
Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq. m
One bedroom	5 sq. m
Two bedroom (3 person)	6 sq. m
Two bedroom (4 person)	7 sq. m
Three bedroom	9 sq. m

Each apartment is provided with a private balcony / terrace which meet or exceeds the above requirements, as demonstrated in the apartment Floor Plans and HQA, prepared by Burke Kennedy Doyle Architects that accompany this planning application.

Communal open space is located immediately east of the Apartment Blocks to serve same. Based on the number of units proposed in the Apartment Blocks (104no.) there is a requirement for c. 632 sq. m communal open space.

We refer the Planning Authority to the Site Layout Plans, prepared by Burke Kennedy Doyle Architects and the Landscape Plans, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further details on the layout and treatment of these spaces.

Furthermore, we refer the Planning Authority to the Daylight, Sunlight and Overshadowing Study, prepared by Integrated Environmental Solutions Limited which assesses the impact of the proposed development on the sunlight availability to the amenity spaces. Generally it is concluded that: -

*“... all amenity space was found to be compliant with the guidelines. Green contours indicate areas which receive at least 2 hours of sunlight on the 21<sup>st</sup> March, darker contours indicate some degree of overshadowing. Overall, more than 99% of proposed amenity space is predicted to receive at least 2 hours of direct sunlight on the 21<sup>st</sup> March.”*

For the Terraces of Duplex / Apartment, the communal and private area requirements to provide oversized private spaces directly accessible to each unit.

As can be seen from the above, the proposed communal and private spaces are well considered and will provide an exception level of amenity for prospective residents.

We refer the Planning Authority to the Design rationale, prepared by Burke Kennedy Doyle Architects for further detail in relation to provision of communal open space serving the apartment blocks and duplexes.

## Car Parking

The Guidelines set out the following broad proximity and accessibility considerations for Apartments are generally defined under the following categories: -

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

In the context of car parking provision, it is considered that the subject lands fall in to the 'Intermediate Urban Location' category which is defined as: -

*"Intermediate Urban Locations: In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard."*

The Planning Application is accompanied by a Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which provides a rationale as to why the site is considered as an intermediate location.

A total of 538no. car parking spaces are proposed to serve the proposed residential units. A car parking ratio of 0.9 for apartments and duplexes. The proposed car parking provisions for apartments and duplexes are in line with the Guidelines in an effort to reduce overall parking standards.

We refer the Planning Authority to the Dwg. No. 6268-P-008 'Proposed Parking Strategy Plan', prepared by Burke Kennedy Doyle Architects which identifies the locations of car parking. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of spaces provided apartment / duplexes.

## Bicycle Parking

The Guidelines set out with regard to bicycle parking that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.

Generally, 1no. dedicated bicycle space per bedroom and 1no. visitor bicycle space per 2no. units is required. Bicycle parking should be easily accessible and provided within a dedicated facility.

In total, 878no. bicycle parking spaces are provided as part of the proposed development. All bicycle parking is located at ground floor level within dedicated, secure and well-lit facilities.

We refer the Planning Authority to the Dwg. No. 6268-P-008 'Proposed Parking Strategy Plan', prepared by Burke Kennedy Doyle Architects which identifies the locations of bicycle parking facilities. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of spaces provided apartment / duplexes.

## Daylight / Sunlight

Section 6.5 of the Apartment Guidelines set out that Planning Authorities must "*weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision with the location of the site and the need to ensure an appropriate scale of urban residential development.*" The Apartment Guidelines state that regard must be had guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.

Section 6.7 of the Apartment Guidelines goes on to state that where an Applicant cannot fully meet all of the requirements of the daylight provisions (in the relevant guidelines), this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out.

We refer the Planning Authority to the accompanying Daylight & Sunlight Analysis, prepared by IN2 Engineering Design Partnership, which provides an analysis of daylight and sunlight that would be available to the proposed development.

The analysis determined that 98.5% of KLD spaces, living rooms and bedrooms would achieve or exceed BRE guidance targets. This provides for an excellent level of amenity value within the development as a whole. It is noted that a total of 12no. units have been determined to be non-compliant, so compensatory measures have been introduced for these units applying the precautionary approach.

The compensatory measures are noted as the following: -

1. Daylight Adjacency – In the cases where a room is below target, there are adjacent room/rooms with the apartment which were found to be comfortably compliant. Therefore, these units each have rooms that are well daylit, despite a single room being slightly below target.
2. Sunlight – The KLDs or bedrooms with below target Spatial Daylight Autonomy receive over 3 hours of sunlight. Therefore, whilst the rooms were found to be non-compliant for daylight, their apartment units achieve the requisite sunlight availability for compliance.
3. Aspect – In addition to their private amenity space, a number of units have direct aspect out onto landscaped communal or public open space providing an excellent view from the KLD space.
4. Direct Access to Courtyard – A number of ground floor units have direct access to courtyard connecting with nature. It also provides a good ventilation through the units.
5. Private Amenity Space – All apartments have been designed to allow direct access to a balcony or patio for private amenity space.

Section 6.3 and Appendix A of the Daylight, Sunlight and Overshadowing Study, prepared by Integrated Environmental Solutions Limited identifies the specific compensatory measures applicable to each of the 12 no. units which are non-compliant.

### **Building Life Cycle Report**

In line with the requirements of paragraph 6.13 of the Apartment Guidelines, this application is accompanied by a Building Lifecycle Report.

We refer the Planning Authority to the Building Lifecycle Report, prepared by SCD Consulting.

### **Build-to-Rent**

On 22 December 2022, updated Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022) came into effect. SPPR 7 and SPPR 8 which set out the requirements and design standards for build to rent (BTR) have now been removed from the Apartment Guidelines.

The proposed development includes 70no. Build-to-Rent units. All units within the proposed development have been designed to the minimum standards for floor area, amenity area, dual aspect etc. The assessment set out above include the 70no. Build-to-Rent units and as such they are designed in accordance with the Apartment Guidelines.

#### **6.4.5 The Planning System and Flood Risk Management (2009)**

A Site Specific Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers has been set out in accordance with the Planning System and Flood Risk Management Guidelines for Local Government (2009) and accompanies this planning application.

The Site Specific Flood Risk Assessment proposes a number of mitigation measures and as a result of these the residual risk of flooding from any source is low.

#### **6.4.6 Design Manual for Urban Roads and Streets (2013)**

The proposed residential scheme is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The scheme proposals are the outcome of an integrated design approach that seeks to implement a sustainable community connected by well-designed streets which deliver safe, convenient and attractive networks.

We refer the planning authority to the Traffic & Transport Assessment Report, prepared by Waterman Moylan Consulting Engineers and the Road Safety Audit, prepared by Bruton Consulting Engineers included in Appendix D of the Traffic & Transport Assessment Report for further details.



## 7 SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028

The application site is designated to be part of the Clonburris Strategic Development Zone. Section 169(9) of the Planning & Development Act 2000, as amended (“the Act”) reads as follows: -

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

As such, the Clonburris Planning Scheme 2019 is the principal planning document in relation to site, and should be deemed to form part of the development plan. This report thus examines the proposed development’s compliance with the Clonburris Planning Scheme primarily. In accordance with the above section of the Act, the Planning Scheme is deemed to form part of the Development Plan. Any complementary measures in the Development Plan will still apply within the SDZ, and these are also discussed in this section.

### 7.1 Core Strategy

It is noted under the Core Strategy that lands at Clonburris have an approved SDZ Planning Scheme and represent a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor.

CS objective 4 states: -

*“To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs.”*

The proposed development is in line with this statement in the core strategy as it provides 385no. residential units in accordance with the Planning Scheme. We refer the Planning Authority to Section 8 of this Report below which details how the proposed development accords with the Clonburris SDZ planning scheme.

### 7.2 Land Use Zoning

The application site is zoned ‘SDZ’ in the Development Plan and is designated to be part of the Clonburris Strategic Development Zone. The land-use objective for the SDZ zoning the objective of which is *“To provide for strategic development in accordance with approved planning schemes.”*

The SDZ is subject to the Planning Scheme for specific land-use allocation. We refer the Planning Authority to Section 8.1 of this Report which outlines the proposed development’s compliance with the specific land use provisions of the Planning Scheme.

### 7.3 Green Infrastructure

South Dublin has a number of Strategic Green Infrastructure Corridors. The Clonburris lands fall within Strategic Corridor 3, the Grand Canal Corridor. The Grand Canal is a key national Green Infrastructure feature, acting as a major ecological and recreational link between the River Shannon in the midlands and Dublin City where the canal enters the sea.

Green space at Clonburris is noted as a stepping stone for the Grand Canal Corridor. The objectives for the stepping stones are as follows: -

- To preserve and enhance hedgerows to provide improved connectivity between the scrubland at Coolscuddan (north of Grangecastle West) and the Grand Canal GI Corridor.
- To enhance the biodiversity within open space areas acting as stepping stones proximal to the Grand Canal Corridor.

The Tree Survey and Planning Report and associated Arborist Drawings, prepared by Independent Tree Surveys Ltd. identify the trees / hedgerows which can be practicably retained.

It is necessary to remove some sections of existing hedgerow to comply with the SDZ Planning Scheme, and where feasible, plants from these hedgerows will be trans-located to suitable areas within the site to further enhance the existing and proposed native vegetation.

A Green Space Factor (GSF) Plan has been prepared for the proposed development in line with GI Objective 4 of the South Dublin County Development Plan 2022 – 2028. In line with the scoring set out in SDCC’s Guidance Note on GSF, the proposed development achieves a GSF score of 0.31. As set out in the Guidance note there is a minimum score of 0.5 for SDZ zoning in SDCC. However, the proposed development is constrained by a number of factor these are detailed further within the Ecological Impact Assessment Report enclosed with this application prepared by Brady Shipman Martin Landscape & Built Environment Consultants.

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail on how the landscaping proposals are in accordance with the provisions of the Planning Scheme.

## 7.4 Housing

It is noted in Chapter 6 of the Development Plan that planned growth for the Development Plan period comprises 93% of new homes within the Dublin City and Suburbs settlement through the re-use, infill and consolidation of existing urban areas with sustainable intensification along public transport networks at the ‘REGEN’ zoned lands, Adamstown and Clonburris SDZs and the new district at Fortunestown. The proposed development will contribute towards this target through the provision of 3,385no. residential units within the Clonburris SDZ.

H1 Objective 12 states: -

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

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

*Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).”*

The proposed development provides 385no. dwellings, of which 173no. are 3-bedroom and 37no. are 4-bedroom units. Therefore, approximately 55% of the proposed units are at least 3-bedrooms, which is above the minimum 30% noted in H1 Objective 12. There are 70no. Build-to-Rent apartments proposed as part of this planning application. All of the Build-to-Rent units proposed comply with the Sustainable Urban Housing: Design Standards for New Apartments (2022).

Policy H7 states: -

*“Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.”*

Policy H8 states: -

*“Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.”*

Policy H9 states: -

*“Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.”*

The proposed development is of a high-quality design which incorporates high quality public and private open space which ensures a pleasant living environment for future residents. We refer the Planning Authority to the Design Rationale and Site Layout Plans, prepared by Burke Kennedy Doyle Architects as well as the Landscape Drawings and landscape Design Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants for further detail in relation to same.

**7.5 Open Space**

Section 8.7.3 addressed the quantity of Public Open Space required within South Dublin County Council. Table 8.2 as below outlines the Public Open Space Standards

2: Public Open Space Standards

Use	Public Open Space Standards (minimum)
All Standard	2.4 Ha per 1,000 Population
Residential Development on Zone RES-N	Minimum 15% of site area
Residential Development in Other Zones including mixed use	Minimum 10% of site area

**Figure 9:** Extract from Table 8.2 of the Development Plan outlining public open space standards.

The proposed development provides 1.45 Ha of public open space on a site of 8.94 Ha hence the proposed development provides c. 16% of the site area as public open space. This is above the minimum requirement in the Development Plan.

**Table 3.20:** Minimum Standards for Housing

Type of Unit	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

31: Minimum Standards for Apartments

Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage
One bedroom	37 sq m	4 sq m	4 sq m	3 sq m
Two bedrooms	45 sq m	5 sq m	5 sq m	3 sq m
Three bedrooms	73 sq m	7 sq m	7 sq m	6 sq m
Four bedrooms	90 sq m	9 sq m	9 sq m	9 sq m

**Figure 10:** Extract from Tables 3.20 and 3.21 of the Development Plan outlining minimum standards of communal and private open space for Houses and Apartments.

All houses are provided with private rear gardens and all apartments and duplexes are also provided with balconies and gardens. All spaces meet the minimum standard as outlined in table 3.20 and 3.21 of the development plan (as above in Figure 10). We refer the Planning Authority to the Site Layout Plan and the HQA, prepared by Burke Kennedy Doyle Architects for further details.

There is also 1,106.2 sq. m of communal open space proposed for the apartment buildings. The landscape design of these communal spaces have been designed to ensure security and segregation of the communal open spaces from the nearby units which are not proposed to use these spaces. We refer the Planning Authority to the Design rationale, prepared by Burke Kennedy Doyle Architects for further detail in relation to provision of communal open space serving the apartment blocks and duplexes. Furthermore, we refer the Planning Authority to the Landscape Plans, prepared by Brady Shipman Martin Landscape and Built Environment Consultants for further detail in relation to the high quality material and finishes proposed.

### 7.6 Car Parking Standards

Section 13.8.2 – Car Parking Standards set out the Maximum Parking rates for non-residential and residential development. Parking rates are divided into two main categories, the proposed development site has components in both Zones 1 and 2. Table 13.26 of the Development Plan sets out Maximum Parking rates.

**Table 13.26: Maximum Parking Rates (Residential Development)**

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

**Figure 11:** Extract from Table 13.26 of the Development Plan outlining maximum car parking requirements.

The Development states that the number of spaces provided for any particular development should not exceed the maximum provision. It is set out that: -

*“The maximum parking standards may also be varied in particular areas by the Planning Authority through planning mechanisms such as SDZ Planning Schemes, Local Area Plans or Movement Framework Plans and Area Access Studies.”*

Section 12.7.5 of the Development Plan states: -

*“EV charging shall be provided in all residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided, with higher provision within this range required in urban areas.”*

The proposed development includes the provision of 538no. car parking spaces which are provided mainly at street level (in curtilage and on-street) and a portion in the undercroft of the Apartment Blocks. 94no. on-street car parking spaces are provided for Electric Vehicles. 100% of in curtilage car parking has future provision of EV car charging.

We refer the Planning Authority to the Traffic & Transport Assessment and Mobility Management Plan, prepared by Waterman Moylan Consulting Engineers for further discussion in relation to car parking provision.

We refer the Planning Authority to the Dwg. No. 6268-P-008 ‘Proposed Parking Strategy Plan’, prepared by Burke Kennedy Doyle Architects which identifies the locations of car parking. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of car parking spaces provided.

Further discussion in relation to car parking requirement sin the context of the Planning Scheme are addressed in Section 8 of this Report below.

### 7.7 Bicycle Parking Standards

Section 13.8.1 – Bicycle Parking / Storage Standards of the Development Plan sets out the minimum bicycle parking / storage for all new development. Bicycle parking / storage rates are divided into two main categories: -

- **Long Term:** These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- **Short Stay:** These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.

TABLE 13.26: Minimum Bicycle Parking/Storage Rates

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

Figure 12: Extract from Table 13.26 of the Development Plan outlining maximum bicycle parking requirements.

The minimum standards set out in Table 13.24 of the Development Plan relate to apartments / duplexes and reflect the standards prescribed in the Apartment Guidelines.

The proposed development includes the provision of 878no. bicycle parking spaces. Spaces for Electric Bicycles are also provided across the site.

We refer the Planning Authority to the Traffic & Transport Assessment and Mobility Management Plan, prepared by Waterman Moylan Consulting Engineers for further discussion in relation to bicycle parking provision.

We refer the Planning Authority to the Dwg. No. 6268-P-008 ‘Proposed Parking Strategy Plan’, prepared by Burke Kennedy Doyle Architects which identifies the locations of car parking. The Parking Requirements Schedule, prepared by Burke Kennedy Doyle Architects provides a breakdown of bicycle parking spaces provided.

Further discussion in relation to car parking requirement sin the context of the Planning Scheme are addressed in Section 8 of this Report below.

## 8 COMPLIANCE WITH CLONBURRIS STRATEGIC DEVELOPMENT ZONE PLANNING SCHEME 2019

The site is subject to Clonburriss SDZ Planning Scheme 2019 (“the Planning Scheme”). The key policies in the Planning Scheme with relevance to the proposed development are examined below.

### 8.1 Land Use

The Key Principles relevant to the application site as per Section 2.1 of the Planning Scheme state: -

- To promote increased residential densities within walking distance of public transport nodes in a manner that creates viable and active urban centres
- To support the development of sustainable communities and to ensure that new residential development is carried out in accordance with Government policy in relation to the development of housing and residential communities, catering for a range of dwelling, types, sizes and tenure options.

Figure 2.1.2 and Table 2.1.1 of the Clonburriss SDZ Planning Scheme identify the areas zoned residential and the Permitted in Principle land uses.

Figure 2.1.2 | Land Use Area Map

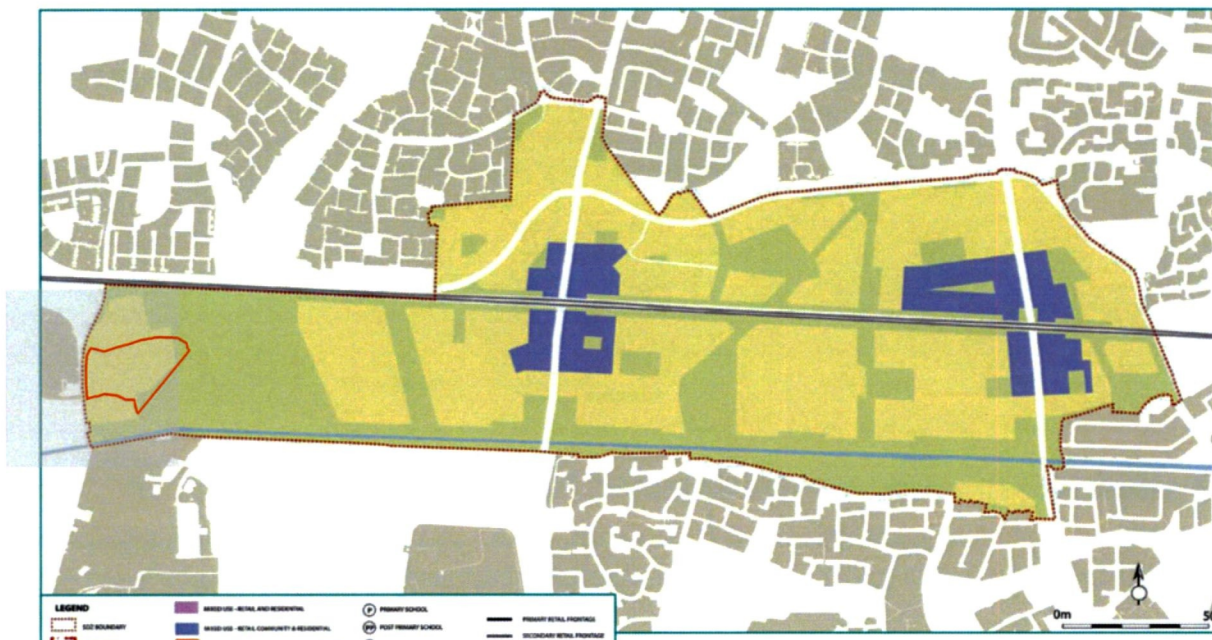


Figure 13: Land Use Area Map and Table from the Planning Scheme with residential-zoned lands in yellow and the application site highlighted in orange (Overlay by SLA).

The majority of the application site is on lands zoned as ‘Primarily Residential’. The remainder of the application site is on lands zoned as ‘Open Space Areas’. Residential use is permissible on lands zoned as ‘Primarily Residential’ and public open space is permissible on lands zoned as ‘Open Space Areas’.

The proposed development comprises 385no. residential units, tenant amenity building (ancillary residential use and public opens space). The proposed residential use and public opens space are permitted uses as set out in Table 2.1.1 and 2.1.3 of the Planning Scheme.

### 8.1.1 Character Area

To provide detailed guidance for the envisioned design of development, the SDZ lands are sub-divided into 3no. Character Areas. These are further sub-divided into ‘Sub-Sectors’ for development. The proposed development falls within the Adamstown Extension Character Area. The Adamstown Extension development area comprises of 2no. subsectors AE-S1 and AE-S2.

Some key principles of the Character Area are as follows: -

- To develop a high quality residential neighbourhood as an extension to Adamstown.
- To provide locally accessible open spaces of local and strategic importance.
- To provide a range of housing along the new avenue and local streets including home zones.
- To provide significant and integrated SUDS infrastructure.

In accordance with the key principles outlined above, the proposed development contributes towards a high quality residential neighbourhood providing 385no. units along in a series of blocks arranged around a hierarchy of interconnected street types. The proposed development provides significant amenity through its provision of open space which includes a well-integrated SuDS strategy and co-ordinated planting and public lighting layout to create a safe and attractive environment. The proposed development includes measures to integrate pedestrian / cycle connectivity to encourage a healthier lifestyle and support a modal shift towards sustainable transport.

We refer the Planning Authority to the Design Rationale, prepared by Burke Kennedy Doyle Architect which demonstrates how the proposed development response to the site context and principle of the Adamstown Extension Character Area.

### 8.1.2 Residential Units and Density

Presented in Figure 14 below showing Table 2.1.5 and table 2.1.8 of the Planning Scheme. These specify the target number of dwellings and density margins in Adamstown Extension.

**Table 2.1.5** | Extent of Residential Development According to Development Area

Development Area	Total Dwelling Units (number)		
	Min	Target	Max
Adamstown Extension	395	442	487

**Table 2.1.8** | Density Margins per Sub Sector

Development Area	Sub Sector	Net Density Margin per Ha.	
		MIN.	MAX.
Adamstown Extension (AE)	S1	43	53
	S2	43	53

**Figure 14:** Extract from Tables 2.1.5 and 2.1.8 of the Planning Scheme relating to target units / density requirements.

The proposed development of 385no. units on a net site area of c. 7.43 Ha. achieves a net residential density of 51.2no. units per Ha. This falls within the acceptable density range (43no. units per Ha to 53no. units per Ha) for the Adamstown Extension Development Area as prescribed in the Planning Scheme.

Furthermore, future development of the Lucan Pitch & Putt lands has been considered in terms of potential density achieved. We refer to the Planning Authority to Dwg. No 6268-P-003 ‘Proposed Master Plan’, prepared by Burke Kennedy Doyle Architects. The layout provides for an additional c. 88no. unit on the Lucan Pitch & Putt lands (indicative layout only) to demonstrate that a nett density of c. 51no. units per Ha can be achieved. As such, the future potential development of Lucan Pitch & Putt lands would continue to meet the required density set out in both the Development Plan, Planning Scheme and national guidance.

The overall Adamstown Extension lands (S1 & S2) can achieve approx. 466no. residential units demonstrating the ‘target’ number of dwelling can be exceeded should the Lucan Pitch & Putt lands be developed in future. Notwithstanding, the proposed development falls within the acceptable density range as set out in Table 2.1.8 of the Planning Scheme.

### 8.1.3 Non-Residential Development

Table 2.1.6 of the Planning Scheme indicates that 0 (zero) sq. m of land in Adamstown Extension Sub Sectors 1 and 2 should be allocated for retail, community, or employment use.

As such, this application does not provide any retail, community or employment uses and remains entirely residential with associated open spaces and ancillary development.

A single storey tenant amenity building is provided to serve the residents of the Build-to-Rent units (an ancillary residential use). It will not be available to member of the general public thus not considered a commercial use for clarity.

### 8.1.4 Residential Dwelling Mix

Section 2.1.6 of the Planning Scheme states: -

*“The range of dwellings permitted in Clonburris include **houses**, townhouses, **duplex units**, maisonettes and **apartments (including Build to Rent and Shared Accommodation)**.”*

[Emphasis added by SLA]

The proposed development includes the provision of houses, duplexes and apartments with an associated Build-to-Rent component. The mix of typologies includes: -

- 139no. houses.
- 72no. duplex / apartments.
- 70no. Build-to-Rent duplex apartment.
- 104no. apartments.

Arising, the mix of units is as follows: -

- 1-Bed: 48 (13% of total units)
- 2-Bed: 127 (33% of total units)
- 3-Bed: 173 (45% of total units)
- 4-Bed: 37 (9% of total units)

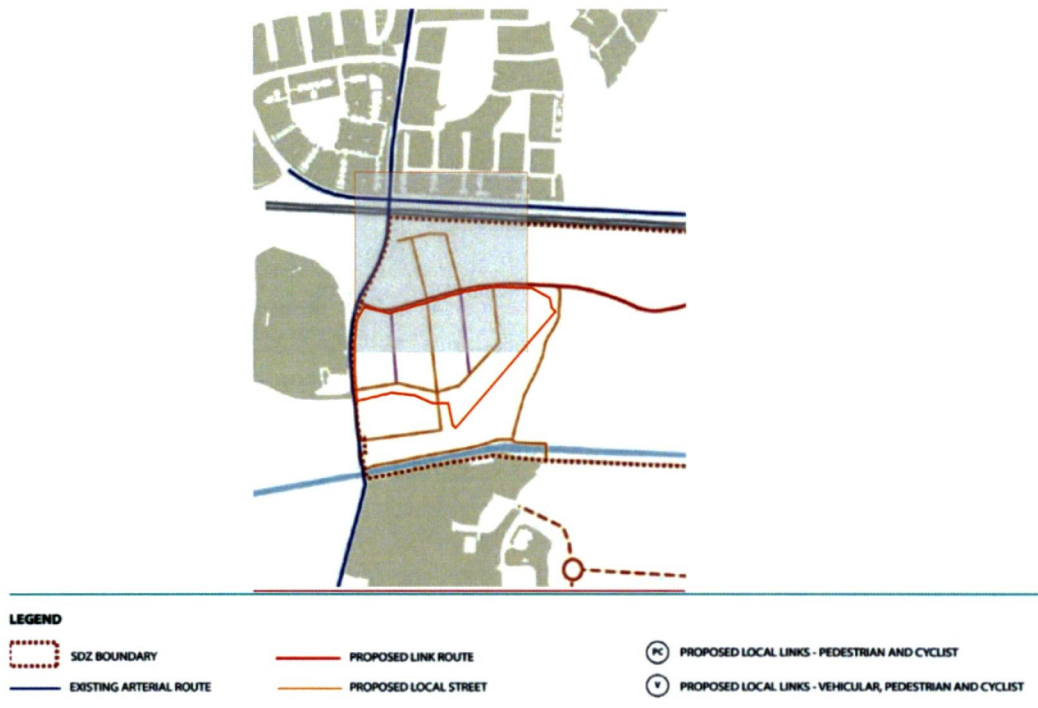
We refer the Planning Authority to the Design Rationale, SoA and HQA prepared by Burke Kennedy Doyle Architect which demonstrates the mix and quality of the dwellings proposed.

## 8.2 Movement and Transport

### 8.2.1 Street Hierarchy

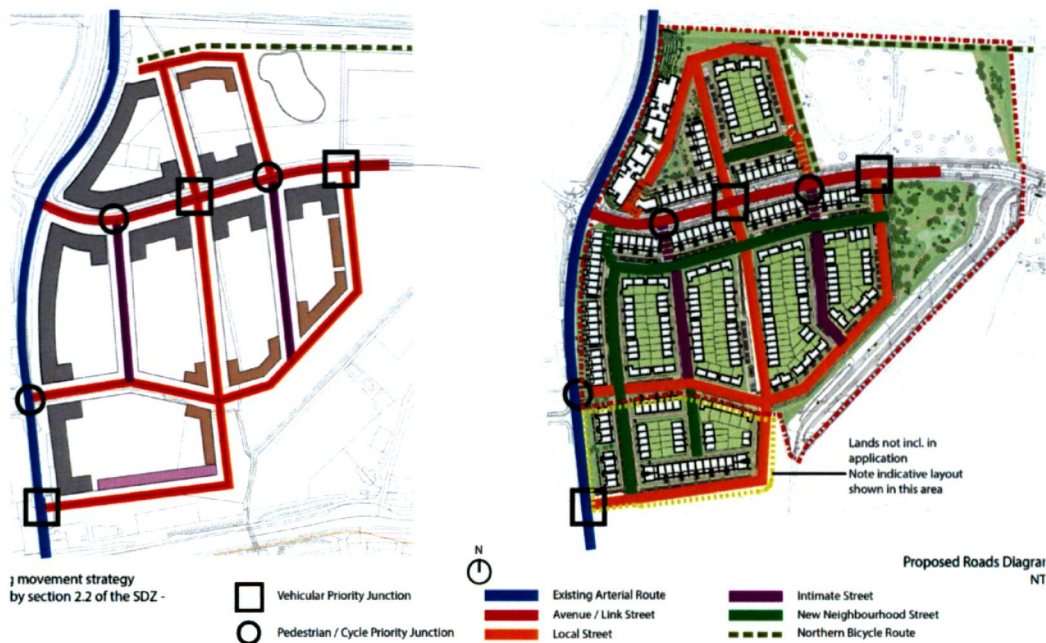
Figure 2.2.1 of the Planning Scheme set out the Street Hierarchy associated with Adamstown Extension Development Area.





**Figure 15:** Extract from Figure 2.2.1 of the Planning Scheme showing Street Hierarchy with application site outlined in orange (Overlay by SLA).

The proposed development provides a street network that is closely aligned with the indicative Street Hierarchy as seen above. The proposed development has due regard to the typology, primacy, alignment and design speed further specified in Table 2.2.1 of the Planning Scheme.



**Figure** Street Hierarchy generally aligns with the Figure 2.2.1 of the Planning Scheme



**Figure 17:** Extract from Dwg. No. 21-055-P1100 Road General Arrangement, prepared by Waterman Moylan Consulting Engineers showing the proposed road alignments.

Figure 15 and 16 below emphasises the interconnection of the proposed street network with the overall Planning Scheme movement strategy via the Clonburris Southern Link Street permitted under SDCC Reg. Ref. SDZ20A/0021.

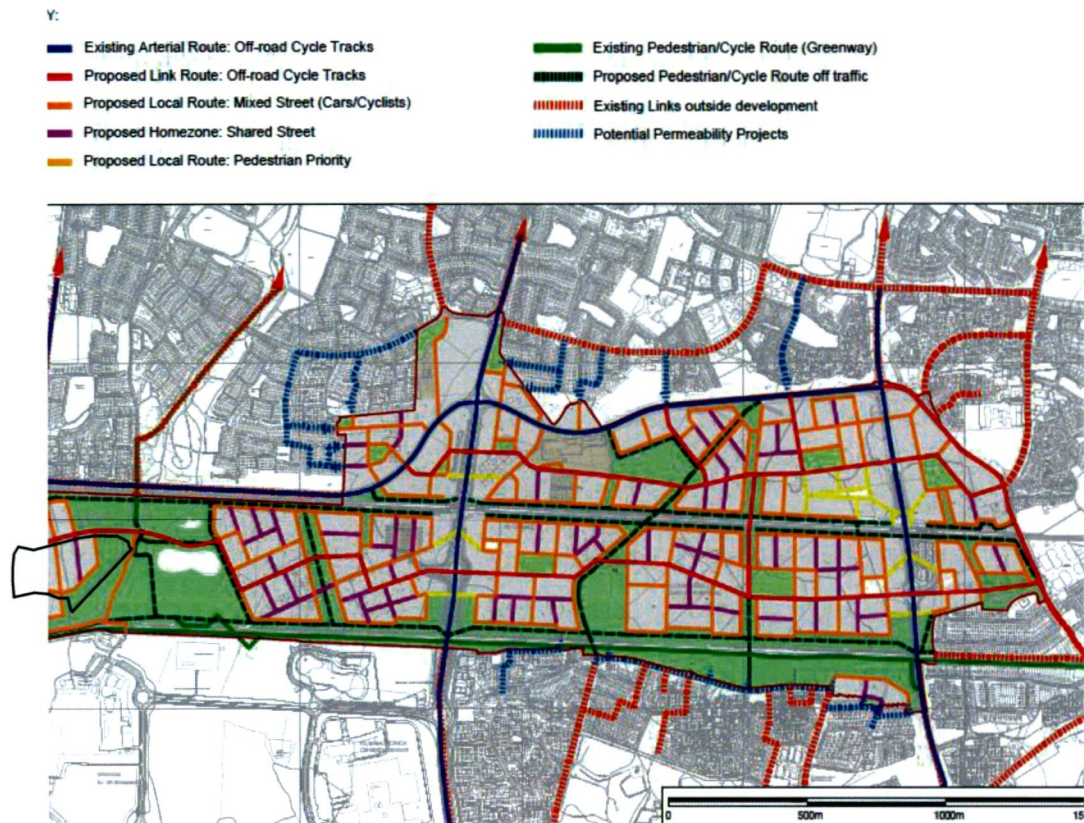
As illustrated in Figure 17 above, the proposed street network provides vehicular connection throughout the subject site by connecting local roads to the permitted Clonburris Southern Link Street and the existing R120 to the west. The local streets proposed satisfy the 15km/hour to 30km/hour Design Speed range.

Across the provision of local streets, there are key movement junctions and no cul-de-sac, which are not permitted within the SDZ lands. Some of the provided Local Streets are considered Intimate Local Streets; therefore, as recommended in the Planning Scheme, the design thereof prioritises pedestrian and cyclist movement in a “shared-space” street / homezone. In consideration of these features, the proposed Local Streets are therefore in accordance with the provisions of the Planning Scheme in this regard.

We refer the Planning Authority to the Traffic & Transport Assessment Report and Roads Drawings, prepared by Waterman Moylan Consulting Engineers and the Design Rationale, prepared by Burke Kennedy Doyle Architects which sets out how the proposed layout generally aligns with the street hierarchy set out in Figure 2.2.1 of the Planning Scheme.

**8.2.1.1 Internal Movement Strategy**

A Transport Assessment & Transport Strategy was prepared to inform the provision of the with the Planning Scheme.



**Figure**  
showing the internal movement strategy and street hierarchy with application site outlined in black (Overlay by SLA).

As set out above, the layout of the proposed development is consistent with the layout set out in the Planning Scheme. The Transport Assessment & Transport Strategy for the Planning Scheme shows an east west ‘Pedestrian / Cycle Route Off Traffic’ adjacent to the northern boundary of the application site to connect with the R120.

Due to significant difference in levels between the R120 and the application site the provision of a ramp is considered unfeasible. The provision of a significant structure to create ramp access has the potential to impact on the grading associated with the attenuation pond permitted under SDCC Reg. Ref. SDZ20A/0021. Furthermore, the provision of a ramp with a steep inclined is likely to be unappealing for cyclists and pedestrians which is further compounded by the fact that there is no dedicated crossing point on the R120 to facilitate connection further west. The proposed development includes a link back towards the Clonburris Southern Link Street permitted under SDCC Reg. Ref. SDZ20A/0021 which will provide appropriate connection back into the main east / west pedestrian / cycle infrastructure.

We refer the Planning Authority to Section 1.14 of the Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for discussion in relation to the issues with the implementation of this cycle / pedestrian connection.

**8.2.2 Car Parking Standards**

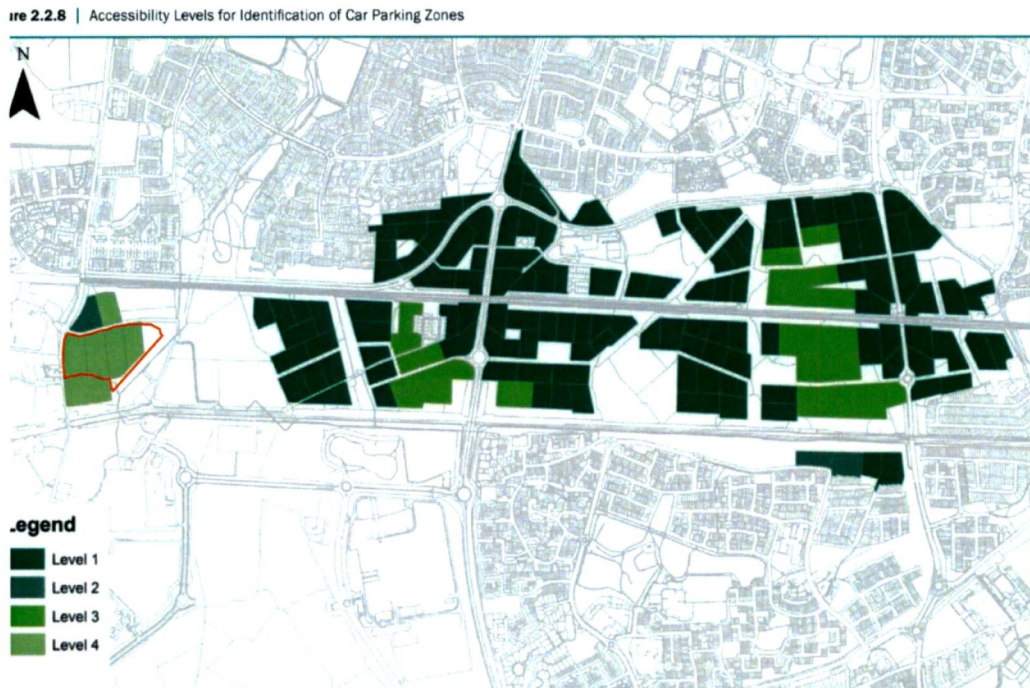
Section 2.2.6 of the Planning Scheme states: -

*“The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme. The standards are maximum parking standards and should not be viewed as a target. Details in relation to the design of car parking are set out under Section 2.8 (Built Form and Design) of this Planning Scheme.”*

In this regard, the Accessibility Levels determined in Figure 2.2.8 of the Planning Scheme correspond to the Parking Zones stated in the Development Plan accordingly: -

- Zone 2 parking standards prescribed under the Development Plan shall be applied to all areas that have been identified with an accessibility Level of 1, 2 or 3.
- Zone 1 parking standards shall be applied to all other areas of the SDZ lands.

In relation to the proposed development, Accessibility Levels 2 and 4 are identified on Figure 2.2.8 of the Planning Scheme.



**Figure 19:** Extract from Figure 2.2.8 Accessibility Level of the Planning Scheme of the Planning Scheme with application site outlined in orange (Overlay by SLA).

We refer the Planning Authority to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers. It is considered that as the majority of the application site is Level 4 it can be classified Zone 1 (Development Plan requirements) and the area of the application site in Level 2 can be classified Zone 2 (Development Plan requirements)

The proposed development includes the provision of 538no. car parking spaces. The car parking standard in Zone 1 provide a ratio of 1.5no. spaces per unit while the car parking standards in Zone 2 provide a ratio of 0.9no. space per unit.

As such, considering the maximum car parking requirements is calculated as 558no. spaces the proposed car parking aligns with the provision of the Development Plan, Planning Scheme and Apartment Guidelines.

Furthermore, 94no. spaces have allocated to Electric Vehicle charging spaces. All other in-curtilage and on street parking have the capacity to provide Electric Vehicle charging points in the future.

Considering the maximum quantum of car parking spaces the proposed development delivers 538no. car parking spaces. This is below the maximum car parking spaces required and provides 20% EV charging spaces with 80% future provision and as such is in accordance with the planning scheme.

### 8.2.3 Bicycle Parking Standards

Section 2.2.6 of the Planning Scheme states: -

*"The minimum parking standards for the SDZ lands are set out under the South Dublin County Council Development Plan 2016 – 2022 and the Transport Assessment and Strategy that accompanies this Planning Scheme."*

We refer the Planning Authority to Section 7.7 of this Report which outlines compliance with the Development Plan bicycle parking requirements.

The proposed development provides 878no. bicycle parking spaces where 638no. spaces is the minimum requirement as set out in the Development Plan. The bicycle parking requirements for Duplexes / apartments are in accordance with the Apartment Guidelines.

#### 8.2.4 Transport Assessment

Section 2.2.7 of the Planning Scheme states: -

*"Transport and Traffic Assessments (TTAs) should be carried out on a case by case basis for developments that have the potential to generate a significant increase in trips on the overall transport network."*

We refer the Planning Authority to the Transport and Traffic Assessment, prepared by Waterman Moylan, in relation to the proposed residential development's impact on street traffic and vehicle parking needs. The Report generally concludes that:

*"Based on the anticipated levels of traffic generated by the proposed development, the existing and future road infrastructure, it is considered that the impact on the surrounding road network will be negligible. Therefore, it is concluded that there are no significant traffic or transportation related reasons that should prevent the granting of planning permission for the proposed development."*

#### 8.2.5 Mobility Management Plan

Section 2.2.7 of the Planning Scheme states: -

*"Individual MMPs or Workplace Travel Plans (WTP) should also accompany applications for larger sized developments in accordance with the recommendations of the NTA's Achieving Effective Workplace Travel Plans: Guidance for Local Authorities (2012)."*

We refer the Planning Authority to the Travel Plan, prepared by Waterman Moylan, in relation to the proposed residential development's measures to encourage sustainable travel modes and reduce car borne traffic within a development.

### 8.3 Green and Blue Infrastructure

It is an overarching principle of the Planning Scheme to: -

*"Deliver a network of high quality green and blue infrastructure spaces and public parks while protecting, enhancing and sensitively upgrading the natural, built and cultural assets of Clonburris lands."*

Some of the **Key Principles** for green and blue infrastructure in the Planning Scheme that relate to the proposed development are as follows: -

- To protect, enhance and develop an interconnected green and blue infrastructure network of parks, open spaces, hedgerows, grasslands, protected areas, rivers and streams for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.
- To retain and improve key landscape and ecological features such as hedgerows, the Grand Canal and the Griffeen River.
- To incorporate new elements of Green and Blue Infrastructure such as tree planting, parks and natural open spaces and sustainable urban drainage systems.
- To seek to retain hedgerows, aquatic habitats and established tree lines wherever possible.

The proposed landscape scheme is a key component of the integration of the new building environment with the existing and permitted landscape conditions. The key landscape features to support green infrastructure include: -

- A range of spaces will be provided to allow opportunities for passive and active recreation. The primary open space provision is located to the east of the development adjacent the Griffeen River.
- The design of streets will enhance the experience of pedestrians and modes of active travel.
- The Griffeen River corridor will be managed for biodiversity – planting will be enhanced where necessary, and a dark corridor will be maintained for bats.

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail on the landscaping proposals.

Furthermore, we refer the Planning Authority to the Tree Survey and Planning Report and associated Arborist Drawings, prepared by Independent Tree Surveys Ltd. that are enclosed with this planning application.

It is generally concluded that the overall arboricultural impact of this development will be low and that the planting of new trees across the development in accordance with the new landscape plans will help mitigate the loss of sections of hedgerow and individual trees that are being removed to facilitate the development.

The Ecological Impact Assessment, prepared by Brady Shipman Martin Landscape & Built Environment Consultants includes a Habitat Management Plan (Appendix 4) which details the management and protection of the hedgerows, treelines, woodland and other semi-natural habitats that are retained and / or enhanced (in accordance with Clonburris SDZ Biodiversity Management Plan).

### 8.3.1 Sustainable Urban Drainage

Section 2.3.2 of the Planning Scheme states: -

*"It is essential that open spaces accommodating SUDS measures such as attenuation ponds, shall be designed in order to achieve a balance between surface water management and high quality open space.*

*The key elements of the proposed SUDS measures are as follows:*

- *The SUDs shall be designed into the street, public squares and open space network, as a series of 'wet' and 'dry' landscape elements. These should be of a high quality to achieve a multifunctional space for amenity, biodiversity and surface water management and should include grasses and swales, and high quality, well designed attenuation ponds and constructed wetlands.*
- *A system of infiltration trenches, tree pits, permeable paving green roofs, and other elements shall be provided that should direct surface water to attenuation areas.*
- *Swales should be designed as linear landscape elements and used as elements to enhance streetscape and neighbourhood character and identity.*
- *Surface water should be captured and treated within the curtilage of each site using green roofs, rainwater gardens, filter trenches or bio retention units."*

The proposed development's SuDs measures rely on the permitted attenuation pond to the immediate north-east of the site (SDCC Reg. Ref. SDZ20A/0021). This attenuation pond has sufficient capacity to accommodate the proposed development. SuDs features incorporate in the proposed development include filter drains, permeable paving, bio-retention systems/raingardens, roadside swales and green roofs. This is in line with the requirements of the Planning Scheme.

We refer the Planning Authority to Section 3 of the Engineering Report and Drainage Drawings, prepared by Waterman Moylan Consulting Engineers, for detailed measures of the proposed SuDs features.

## 8.4 Built Form and Design

### 8.4.1 Design Criteria

Section 2.8.2 of the Planning Scheme states: -

*“To ensure coherency and quality in design, all medium to large scale development proposals on the SDZ lands (Landmark Buildings, 10 dwellings or more in the case of residential development or development of over 1,000 sq.m in the case of employment or retail/ retail services development) shall be accompanied by a Design Rationale...”*

We refer the Planning Authority to the Design Rationale, prepared by Burke Kennedy Doyle Architects for further detail on proposed design elements.

**8.4.2 Block Size and Form**

Section 2.8.3 of the Planning Scheme states: -

*“Development across the SDZ lands shall be shaped and defined by the street network prescribed under the Movement and Transport section of this Planning Scheme (Section 2.2) and shall be divided into a series of blocks that present strong building frontages to surrounding streets especially at corners.”*

The proposed development provides a mix of residential unit types in 2no. primary apartment blocks addressing the R120, 3no. duplex / apartment blocks addressing the R120 and 6no. duplex / apartment blocks addressing the Clonburriss Southern Link Street permitted under SDCC Reg. Ref. SDZ20A/0021. The blocks are designed with building massing to the permitter while maintaining appropriate set-back from the streets. Building frontage is inclusive of primary and secondary street frontage with no dead or windowless gables.

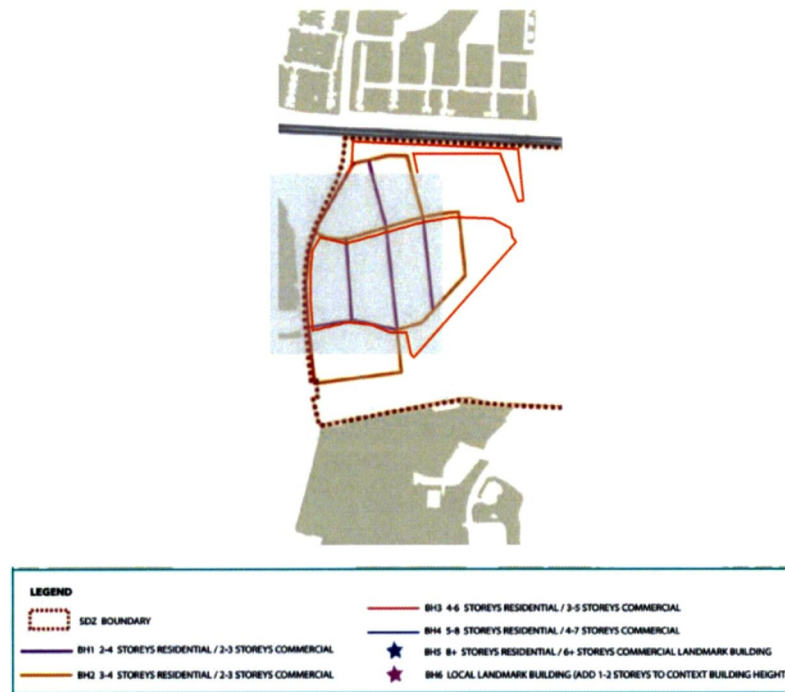


**Figure 20:** Extract from the Design Rationale, prepared by Burke Kennedy showing how the height, form, massing and materiality reflect to the different conditions of the Adamstown Extension Development Area.

We refer the Planning Authority to the Design Rationale, prepared by Burke Kennedy Doyle Architects for further detail on proposed block size, scale, form and massing.

**8.4.3 Building Height**

The general building height guidelines for the Planning Scheme are identified in Figure 21 below.



**Figure 21:** Extract from Figure 2.8.10 Building Height Strategy of the Planning Scheme of the Planning Scheme with application site outlined in orange (Overlay by SLA).

The application site contains BH1, BH2 and BH3 streets. The appropriate range for building height in the subject site is therefore 2 – 6 storeys. The proposed development ranges in height from 2 – 6 storeys and as such is in line with the Building Height Strategy as presented in the Planning Scheme.



**Figure 22:** Extract from the Design Rationale, prepared by Burke Kennedy showing how the proposed building height aligns with the provisions of the Planning Scheme.

We refer the Planning Authority to the Architectural Drawings and Design Rationale prepared by Burke Kennedy Doyle Architects Architects, for specific details on the building heights.



Furthermore, we refer the Planning Authority to the landscape & Visual Impact Assessment, prepared by Brady Shipman Martin Landscape & Built Environment Consultants. In terms of residual effects on the landscape context it is generally concluded that *“the magnitude of change on landscape context of the Site during the Operational Phase will be medium and the effect will be moderate, positive, and long-term.”*

## **8.5 Services and Infrastructure**

### **8.5.1 Water Supply**

The strategic objectives for the delivery of water services are set out by the Water Services Strategic Plan (WSSP) by Irish Water up to 2040. At a local level, SDC C manages aspects of the water supply and foul drainage networks.

The Planning Scheme notes that capacity in the surrounding water supply network is *“generally sufficient”* to supply the SDZ lands, and that the projected population of Clonburris has been taken into account by Irish Water in their planning for the Greater Dublin Area.

Water will be supplied to the proposed development via 8no. connections to the permitted watermain networks as per SDCC Reg. Ref. SDZ20A/0021. 3no. connections will serve the development to the north of Hayden’s Lane and 5no. connections serving the lands to the South.

We refer the Planning Authority to the Statement of Design Acceptance, dated 18 January 2023, in respect of the proposed development, which demonstrates compliance with Irish Water Standards.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for water supply.

### **8.5.2 Foul Water Drainage**

The Planning Scheme notes that wastewater infrastructure development within the SDZ must align with Irish Water’s Strategic Network Development Plans for the SDZ.

It is proposed to drain wastewater from the proposed development via a network of foul gravity sewers which flow to a network in Hayden’s Lane as permitted under SDCC Reg. Ref. SDZ20A/0021. There will be a total of 2no. connections from the proposed development to the permitted infrastructure, 1no. connection from the North of Hayden’s Lane and 1no. from the South of Hayden’s Lane.

We refer the Planning Authority to Drawing Nos. P1201 and P1202 Drainage Layout Sheets 1 and 2, prepared by Waterman Moylan Consulting Engineers, which show the proposed foul drainage layout.

The Certificate of Feasibility received from Irish Water confirms that there is sufficient capacity for wastewater connection subject to certain upgrade works.

We refer the Planning Authority to the Statement of Design Acceptance, dated 18 January 2023, in respect of the proposed development, which demonstrates compliance with Irish Water Standards.

The required upgrade works for part of the permitted roads and drainage infrastructure works (SDCC Reg. Ref. SDZ20A/0021 refers). Works on the roads and drainage infrastructure are due to commence in 2023.

### **8.5.3 Surface Water Drainage**

A Surface Water Strategy (SWS) was carried out in respect of the Planning Scheme and forms part of the accompanying documents to the Planning Scheme.

The key principles of surface water management outlined in the Surface Water Strategy (SWS) accompanying the Planning Scheme are as follows: -

- Manage surface water runoff at source in order to prevent or reduce surface water flows.
- Manage water on the surface to intercept flows and direct them to areas designed to treat, store and discharge flows away from residential dwellings, businesses, and transportation networks, where disruption and flooding could occur.
- Develop a high quality SuDS integrated within public realm and public open space where feasible, to provide high quality and attractive 'green and blue' corridors, features and focal points with the SDZ landscape, which can also enhance local amenity, ecology and biodiversity.
- Effective operation and maintenance of SuDS measures, to ensure that such systems are operating to their designed capacity.
- Account for climate change and any changes to the amount of impermeable areas over the design life of the development, in accordance with the GSDSDS.

It is proposed to drain surface water from southern area via 4no. connections to the permitted surface water network. From where it will discharge to the permitted attenuation pond.

For the norther area it is intended to discharge directly to the permitted attenuation pond (immediately east). This will require a minor amendment to the attenuation pond permitted under SDCC Reg. Ref. SDZ20A/0021 to include a new outfall headwall into the pond (northwest area).

The Sustainable Urban Drainage Strategy (SuDS) strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed, on and around the apartment blocks (source controls), include the following: -

- Permeable paving.
- Filter drains.
- Green / Sedum roofs.

SuDS measures proposed, within the wider application site (site controls), include the following: -

- Roadside Bio-retention Tree Pits.
- Swales

Regional controls will be provided by the infrastructure permitted under SDCC Reg. Ref. SDZ20A/0021 refers which has been sized and designed in anticipation of the subjection application. This permitted infrastructure includes an attenuation pond, a flow control device, and a petrol interceptor.

We refer the Planning Authority to Section 3.4 of the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers for further information.

The SuDS measures proposed have been co-ordinated with the landscaping scheme presented by Brady Shipman Martin Landscape & Built Environment Consultants.

#### **8.5.4 Energy and Efficiency**

The planning scheme noted the construction of new homes are required to comply with Building Regulations Part L.

An Energy Efficiency and Climate Change Adaptation Design Rationale, prepared by Waterman Moylan Consulting Engineers is enclosed with this planning application. This analysis determined an energy and servicing strategy to enable compliance with the standards set out under the Building Regulations Technical Guidance Document Part L 2021.

#### **8.5.5 Waste Management**

The Planning Scheme notes that waste and recycling needs to be fully considered and implemented in design, construction and operational phases of development.

We refer the Planning Authority to the Resource Waste Management Plan and the Operational Waste Management Plan prepared by AWN Consulting which detail how waste will be managed during construction and operation of the proposed development.

## 8.6 Landscape and Open Spaces

### 8.6.1 Proposed Open Spaces

The general building height guidelines for the Planning Scheme are identified in Figure 23 below.

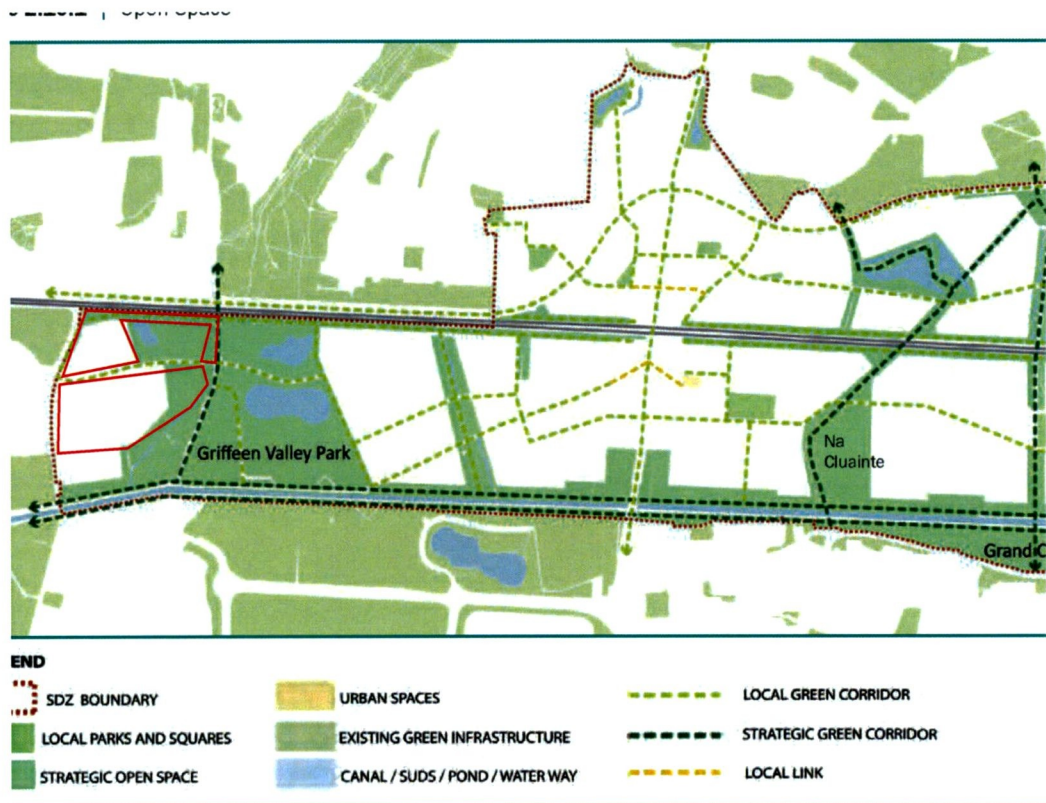


Figure  
(Overl

3

The primary open space area is located to the east of the application site adjacent the Griffeen River. Further landscaping and public open space will be provided to the north of the application site which will integrate with the attenuation pond area permitted under SDCC Reg. Ref. SDZ20A/0021. Overall, 1.45 Ha of public opens space is provided. The Griffeen River corridor will be managed for biodiversity with planting enhanced where necessary, and a dark corridor will be maintained for bats.

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail on the landscaping proposals.

## 8.7 Biodiversity and Natural Heritage

Key principles for Biodiversity and Natural Heritage in the Planning Scheme which relate to the proposed development are as follows: -

- To seek to protect and enhance natural, built and cultural heritage features, where appropriate, such as the Grand Canal, streams, Protected Structures and barony and townland boundary hedgerows.

- To avoid or minimise the impact on protected species and their habitats.
- Incorporate biodiversity and heritage into new developments.

### 8.7.1 Grand Canal

The Grand Canal is a proposed Natural Heritage Area (pNHA). Development proposals in proximity to the Grand Canal are required under the Planning Scheme to: -

*“Protect and incorporate high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches.”*

The Planning Scheme states that development (with the exception of footpaths and bridges) is required to maintain a 30m set back distance from the boundary of the pNHA. The proposed development is not located within 30m of the Grand Canal pNHA.

### 8.7.2 Ecological Corridor

The proposed development is adjacent to the Griffeen River (situated east of the subject site) and to the rail line (situated north of the subject site), both of which are categorized as primary ecological corridors under the Planning Scheme.

The proposed development seeks to avoid the loss of existing wildlife within these ecological corridors. The existing main water courses adjacent the site (Griffeen River) will not be affected by the proposed development. The Griffeen River corridor will be managed for biodiversity with planting enhanced where necessary, and a dark corridor will be maintained for bats.

We refer the Planning Authority to the Ecological Impact Assessment (which includes a Habitat Management Plan), prepared by Brady Shipman Martin Landscape and Built Environment Consultants for further detail in relation to habitat protection measure to be implemented as part of the proposed development.

### 8.7.3 Street Trees

The Planning Scheme provides that street trees should be considered an integral part of the street environment, in accordance with DMURS. Trees should be planted in medians, verges and build outs. Tree planting should be at frequent intervals, particularly where it can soften the impact of on-street parking. Larger tree species should be planted along all arterial and link streets.

The proposed scheme includes tree planting along the quantum of Local Roads which are interconnected with the permitted Link Street and its associated street trees. Trees have been selected according to the Adamstown Extension character area. Tree species have been chosen for their suitability to the future surrounding environment, their biodiversity value and impact on the long and short-term character of the road. The placement of the trees has been carefully considered so that tree planting does not interfere with sightlines and lighting columns set out by the design team, creating a dynamic rhythm along the extent of the proposed roads.

We refer the Planning Authority to the accompanying Landscape Design Report and Landscape Drawings, prepared by Brady Shipman Martin Landscape and Built Environment Consultants, for details of the proposed tree planting.

### 8.7.4 Hedgerows

There are over 30km of hedgerows that must be protected across the SDZ lands. Section 2.11.2 of the Planning states that: -

*“The hedgerow / treeline habitat linking the Grand Canal Corridor and the Rail Corridor should be retained where possible, in order to maintain the continued ecological integrity of these habitats including for foraging and commuting bats.”*

We refer the Planning Authority to the Landscape Masterplan Drawings and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail on the landscaping proposals. The Griffeen River corridor will be managed for biodiversity with planting enhanced where necessary, and a dark corridor will be maintained for bats.

### 8.8 Heritage Preservation

It is an overarching principle of the planning scheme: -

*“To retain and enhance architectural heritage and archaeological heritage features, sites and structures within the SDZ lands by encouraging conservation and incorporation including adaptive re-use, where appropriate, within the built fabric and landscape of the SDZ Lands.”*

The Planning Scheme also includes the following key principle for Biodiversity and Natural Heritage: -

*“To ensure that the high archaeological potential of the SDZ lands is fully considered and valued throughout the design and construction process.”*

There are no Protected Structure within or immediately adjacent the application. As such, impacts on architectural heritages does not arise.

The application site is not within an archaeological zone. Notwithstanding, the Applicant would invite the Planning Authority to attach a reasonable condition of permission requiring that construction works be monitored by a suitably qualified archaeologist, to be engaged prior to commencement of development.

### 8.9 Compliance with Phasing Requirements

The Planning Scheme sets out a phasing programme to ensure the coordinated planning and delivery of essential strategic infrastructure, amenities and community facilities in advance of and in tandem with population growth in Clonburris. Table 4.3 of the Planning Scheme sets out the phasing schedule and programme for the Clonburris SDZ, this table is shown in Figure 24 below.

Table 4.3 | Phasing Table

Phase	Residential Units constructed and occupied	Minimum delivery in Phase
	<b>Prior to commencement of development</b>	<ul style="list-style-type: none"> <li>» Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.</li> <li>» Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.</li> <li>» Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council.</li> </ul>
<b>1A</b>	<b>0 - 1,000</b>	<ul style="list-style-type: none"> <li>» Retail Core development in accordance with the Place Making Requirements.</li> <li>» Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station &amp; completion of the realignment of Lock Road (R120).</li> <li>» Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC.</li> <li>» The planning of works for the provision of community floor space and the availability of childcare spaces.</li> </ul>
<b>1B</b>	<b>1,001 - 2,000</b>	<ul style="list-style-type: none"> <li>» Planning permission for appropriate elements of Clonburris Retail Core, including retail provision, employment, residential, community floorspace and urban hub.</li> <li>» Planning permission for Kishoge Retail Core, including retail provision, employment, community floorspace and residential.</li> <li>» Planning and commencement of works at Griffeen Valley Park Extension or Na Cluainte (North and South) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.</li> <li>» Agree and make available a school site to the Department of Education (in accordance with requirement of the Department of Education and SDCC).</li> <li>» Provision of a minimum 1,000 sqm net convenience floorspace and 500 sqm net comparison/ retail services floorspace (As part of the Place Making Requirements for delivery of Kishoge).</li> <li>» Provision of a minimum of 500 sqm of community services floorspace (e.g. childcare or health centre) (At Kishoge or Clonburris - subject to location of residential units constructed).</li> <li>» Design and planning permission for District Park Hub at Clonburris Little.</li> <li>» Planning and commencement of Link Streets with associated undergrounded services in Development Areas where construction of residential units commences or commenced in Phase 1 (A or B).</li> <li>» Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3.</li> <li>» District and catchment level measures from an agreed Surface Water Management Plan to accommodate construction within the subject development areas of construction.</li> <li>» Retail Core development in accordance with the Place Making Requirements.</li> <li>» Development shall accord with Local Infrastructure Requirements in relation to opening of Kishoge Railway Station.</li> <li>» Provision of Water and Wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.</li> </ul>

Figure 24: Phasing Table as per the Clonburris SDZ Planning Scheme.

At the time of making this planning application, site clearance / enabling works for permitted residential development within the Clonburris Southwest Development Area in the Clonburris SDZ lands (SDCC Reg. Ref. SDZ21A/0022 refers) have commenced. This is the only active residential development in the Clonburris SDZ lands and as such no units have been completed / occupied yet.

Works on the roads and drainage infrastructure permitted under SDCC Reg. Ref. SDZ20A/0021 are due to commence in 2023.

Minimum Delivery in Phase	Status
<b>Prior to commencement of Development</b>	
Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.	<b>Complete – Approved by SDCC</b>
Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.	<b>Complete – Approved by SDCC</b>
Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council.	<b>Complete – Approved by SDCC</b>
<b>Phase 1A (0 – 1,000 residential units constructed and occupied)</b>	
Retail Core development in accordance with the Place Making Requirements.	Not Applicable to Adamstown Extension Development Area.
Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station & completion of the realignment of Lock Road (R120).	Not Applicable to Adamstown Extension Development Area.
Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC.	Noted. Refer to Irish Water Confirmation of Feasibility accompanying this planning application.
The planning of works for the provision of community floor space and the availability of childcare spaces.	Not Applicable to Adamstown Extension Development Area.
<b>Phase 1A (1,001 – 2,000 residential units constructed and occupied)</b>	
Planning permission for appropriate elements of Clonburris Retail Core, including retail provision, employment, residential, community floorspace and urban hub.	Not Applicable to Adamstown Extension Development Area. We note SDCC Reg. Ref. SDZ22A/0018 is seeking permission for retail and office floor space. This application is awaiting a decision.
Planning permission for Kishoge Retail Core, including retail provision, employment, community floorspace and residential.	Not Applicable to Adamstown Extension Development Area.
Planning and commencement of works at Griffeen Valley Park Extension or Na Cluainte (North and South) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.	Works to commence in late 2023.
Agree and make available a school site to the Department of Education (in accordance with requirement of the Department of Education and SDCC).	Not Applicable to Adamstown Extension Development Area.

Minimum Delivery in Phase	Status
	Department of Education is seeking permission for a Primary School (SDCC Reg. Ref. SDZ22A/0011 refers) – currently at Further Information stage.
Provision of a minimum 1,000 sqm net convenience floorspace and 500 sqm net comparison/ retail services floorspace (As part of the Place Making Requirements for delivery of Kishoge).	Not Applicable to Adamstown Extension Development Area.
Provision of a minimum of 500 sqm of community services floorspace (e.g. childcare or health centre) (At Kishoge or Clonburris – subject to location of residential units constructed).	Not Applicable to Adamstown Extension Development Area.
Design and planning permission for District Park Hub at Clonburris Little.	Not Applicable to Adamstown Extension Development Area.
Planning and commencement of Link Streets with associated undergrounded services in Development Areas where construction of residential units commences or commenced in Phase 1 (A or B).	Works to commence in late 2023.
Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3.	We note SDCC Reg. Ref. SDZ22A/0018 is seeking permission for a creche. This application is awaiting a decision.
District and catchment level measures from an agreed Surface Water Management Plan to accommodate construction within the subject development areas of construction.	Noted.
District and catchment level measures from an agreed Surface Water Management Plan to accommodate construction within the subject development areas of construction.	Noted.
Development shall accord with Local Infrastructure Requirements in relation to opening of Kishoge Railway Station.	Kishoge Railway Station to open in 2023.
Provision of Water and Wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.	Noted.

## 9 ENVIRONMENTAL ASSESSMENTS

### 9.1 Construction & Environmental Management Plan

A Construction & Environment Management Plan (CEMP), prepared by AWN Consulting is enclosed with this planning application. This details how the construction phase will be managed with minimal impacts on the environment or the surrounding community.

We confirm that a fully comprehensive CEMP (to be prepared by the appointed Contractor), to implement the requirements of the CEMP will be submitted to the Planning Authority for its approval in advance of any works commencing on site, should the Board grant permission for the proposed development.

### 9.2 Appropriate Assessment

We refer the Planning Authority to the Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants. The Report generally concludes: -

*"In view of best scientific knowledge this report concludes that the proposed development at Adamstown Extension, individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.*

*It is considered that this report provides sufficient relevant information to allow the Competent Authority (South Dublin County Council) to carry out an Appropriate Assessment Screening under Section 177U of the Planning Acts, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive in light of their conservation objectives."*

### 9.3 Ecological Impact Assessment

We refer the Planning Authority to the Ecological Impact Assessment Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants. The Report generally concludes: -

*"The proposed Adamstown Extension development in Clonburris SDZ will result in the removal of an internal hedge, as well as areas of scrub, immature woodland, unmanaged grassland and disturbed and recolonising ground. In line with the requirements of the Clonburris SDZ planning scheme, a new residential development will be delivered. Associated with the development will be new public open space and landscaped areas, including significant areas of ecologically sensitive planting and bat and bird boxes, insect hotels and the retention and enhancement of the boundary hedgerow / treeline and scrub. With the implementation of the required mitigation, including the significant additional hedgerow and treeline planting, and enhancement of retained grassland, there will be no long-term residual impact on any ecological receptors, either within or in the vicinity of the site, or associated with any site designated for nature conservation as a result of the proposed development."*

### 9.4 Screening for Environmental Impact Assessment

We refer the Planning Authority to the Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates Chartered Planners & Development Consultants. The Report generally concludes that: -

*"Having regard to the limited nature and size of the proposed development, its location on lands zoned for residential development, the site is within a SDZ and the proposed development is in line with the emerging pattern of development in this area, the nature and extent of the proposed development is not considered likely to result in any long-term significant impacts on its surrounding environment. Construction practices in line with the enclosed Construction and Environment Management Plan and mitigation in line with other reports. The temporary impact in respect of noise, dust and traffic will be predominantly contained within the development site, and in any case would be consistent of any similar development of this nature. The need for environmental impact assessment can, in our professional opinion therefore be excluded."*



## 10 CONCLUSION

We do not consider that there will be any significant adverse planning impacts arising from the proposed development. It is our considered professional planning opinion that the proposed development which is the subject of this planning application complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in: -

- Rebuilding Ireland – Action Plan for Housing & Homelessness.
- National Planning Framework, Ireland 2040.
- Regional Spatial & Economic Strategy for the Eastern & Midlands Area and Dublin Metropolitan Area Spatial Plan.
- Transport Strategy for the Greater Dublin Area 2022 – 2042.
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- Urban Design Manual – A Best Practice Guide (2009).
- Quality Housing for Sustainable Communities (2007).
- Sustainable Urban Housing: Design Standards for New Apartments (2022).
- South Dublin County Council Development Plan 2012 – 2028.
- Clonburris Strategic Development Zone Planning Scheme (2019).
- Other relevant national and regional planning strategies, objectives and planning design guidelines for development in the Dublin area.

The proposed development which is the subject of this planning application should be supported by the Planning Authority, on the grounds that: -

- The subject lands are located within ‘Dublin City and Suburbs’ and identified as having strategic residential development potential in the NPF. The lands are well connected, zoned and readily serviceable.
- The application site is located within Clonburris and is a residential-led development of which is targeted as part of the ‘South-West Strategic Development Corridor’ in the DMASP of the relevant RSES.
- It is therefore in line with the aspirations of the Core Strategy for South Dublin County and strategic policy objectives at National and Regional level to consolidate housing growth, to meet population projections, within the ‘Dublin and Suburbs’.
- It is compliant with the policies and objectives of the Development Plan and the Planning Scheme, and thus the proper planning and development of the area.
- The density, general layout (including road hierarchy) and building height of the proposed development is in accordance with the provision of the Planning Scheme.
- The proposed scheme involves the construction of a high-quality residential scheme which provides a large quantum of public open space and integrates with permitted public spaces and cycle / pedestrian infrastructure.
- The proposed design and layout seek to maximise penetration of sunlight and daylight and contribute positively to the design and appearance of the public realm.
- The design of apartments, duplex and houses within the scheme meet the sustainable development standards set out in the relevant Section 28 Ministerial Guidelines.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

## 11 ENCLOSURES

The following items are included with this application: -

1. Completed Application Form.
2. Proof of payment for planning application fee of €25,637.00
3. Newspaper Notice published (1 no. original copy of the relevant page).
4. Site Notice erected at 8no. locations on (1 no. copy enclosed).
5. Part V Proposal Letter, prepared by Clear Real Estate Holdings.
6. Part V Validation Letter from South Dublin County Council.
7. Letter from the Irish Aviation Authority.
8. Irish Water Confirmation of Feasibility.
9. Irish Water Design Acceptance Statement.

**6 no. copies** of the following plans and particulars: -

10. Planning Application Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
11. Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
12. Planning Drawings, prepared by Burke Kennedy Doyle Architects (Please refer to enclosed drawing schedule).
13. Design Rationale, prepared by Burke Kennedy Doyle Architects.
14. Schedule of Accommodation, prepared by Burke Kennedy Doyle Architects.
15. Housing Quality Assessment, prepared by Burke Kennedy Doyle Architects.
16. Engineering Drawings, prepared by Waterman Moylan Engineering Consultants (Please refer to enclosed drawing schedule).
17. Engineering Assessment Report, prepared by Waterman Moylan Engineering Consultants.
18. Flood Risk Assessment, prepared by Waterman Moylan Engineering Consultants.
19. Traffic & Transport Assessment, prepared by Waterman Moylan Engineering Consultants.
20. Travel Plan, prepared by Waterman Moylan Engineering Consultants.
21. Construction Traffic Management Plan, prepared by Waterman Moylan Engineering Consultants.
22. Construction Surface Water Management Plan, prepared by Waterman Moylan Engineering Consultants.
23. Energy Efficiency and Climate Change Adaptation Design Rationale, prepared by Waterman Moylan Engineering Consultants.
24. Landscape Design Report, prepared by Brady Shipman Martin.
25. Landscape Drawings, prepared by Brady Shipman Martin (Please refer to enclosed drawing schedule).
26. Landscape and Visual Impact Assessment, prepared by Brady Shipman Martin.
27. Photomontages, prepared by Brady Shipman Martin.
28. Appropriate Assessment Screening Report, prepared by Brady Shipman Martin.

29. Ecological Impact Assessment (including Habitat Management Plan), prepared by Brady Shipman Martin.
30. Tree Survey and Planning Report, prepared by Independent Tree Surveys Limited.
31. Arborist Drawings, prepared by Independent Tree Surveys Limited (Please refer to enclosed drawing schedule).
32. Sunlight and Daylight Analysis, prepared by IN2 Design Partnership.
33. Noise Impact Assessment, prepared by RSK Ireland Limited.
34. Outdoor Lighting Report, prepared by SABRE Electrical Services Limited.
35. Public Lighting Drawings (Dwg. No. SES 17022 Sheet 1 – Public Lighting Layout and Dwg. No. SES 17022 Sheet 2 – Public Lighting Layout), SABRE Electrical Services Limited.
36. Construction Environmental Management Plan, prepared by AWN Consulting.
37. Resource Waste Management Plan, prepared by AWN Consulting.
38. Operational Waste Management Plan, prepared by AWN Consulting.
39. Building Life Cycle Report, prepared by SCD Consulting.

**STEPHEN LITTLE & ASSOCIATES**

3 February 2023

Stephen Little & Associates are committed  
to progressing and achieving sustainable  
development goals.

Chartered Town  
Planners and  
Development  
Consultants

Address:  
26/27  
Upper Pembroke Street  
Dublin 2, D02 X361

Contact:  
T: 353-1 676 6507  
info@sla-pdc.com  
sla-pdc.com