

Planning  
Report –  
Further  
Information  
Reg. Ref.:  
SDZ23A/0004

Clonburris SDZ  
Adamstown  
Extension

Proposed Residential  
Development and All  
Associated and  
Ancillary Works.

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

For Clear Real Estate  
Holdings Limited

**NOVEMBER 2023**

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## 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 Further Information Response Report. It forms part of the response to the Planning Authority's Request for Further Information, dated 06 April 2023, in respect of proposed residential development comprising in Adamstown Extension in the Clonburris Strategic Development Zone (SDZ), under Planning Application SDCC Reg. Ref. SDZ23A/0004.

Arising from the request for Further Information the revised scheme, in summary, seeks planning permission for a period of 7 years for development comprising 395no. units (139no. houses, 74no. 'Build-to-Rent' duplex / apartments, 68no. duplex / apartments and 114no. apartments), 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"*.

We are pleased to note the generally positive assessment of the proposed development by the Planning Authority (see Section 2 below). We welcome this opportunity to provide Further Information and clarification to the Planning Authority in relation to those specific matters it has raised in its letter dated 06 April 2023. We trust this submission will assist the Planning Authority in its further assessment of same and determination of the application.

We note that in issuing the Request for Further Information, the Planning Authority has had full regard to the issues raised by third party submissions. This is confirmed by reference to the Chief Executive's Order.

The Applicant's formal response comprises this Report and the accompanying Further Information plans and particulars enclosed herewith. A list of enclosures is provided at the end of this Report.

6no. copies of the Further Information material are submitted in accordance with the requirements set out in the Request for Further Information dated 6 April 2023.

This Further Information response has been prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants with significant inputs from Burke Kennedy Doyle Architects, Waterman Moylan Engineering Consultants, Brady Shipman Martin Built Environment Consultants, 3D Design Bureau, AWN Consulting, IN2 Design Partnership, Irish Archaeological Consultancy and Sabre Electrical Services Limited.

## **2 PLANNING AUTHORITY'S ASSESSMENT**

From the Chief Executive's Order and the Further Information Request we interpret the Planning Authority's general satisfaction that the following aspects of the proposed scheme have been appropriately resolved by the Applicant and its Design Team.

### **2.1 Land Use Zoning**

The Planning Authority considers that principle of residential development on this portion of the SDZ lands is consistent with the Planning Scheme.

### **2.2 Density**

The Planning Authority generally considers that the number of units proposed and density achieved is consistent with the Planning Scheme. It is considered that the proposed development does not preclude the development of the remainder of Sub-sector 2 in accordance with the Planning Scheme.

Clarification was sought in relation to the distributions of units across the Sub-sectors. A response to this is set out in Section 5 of this Report.

### **2.3 Dwelling Mix**

The Planning Authority generally considers that a good mix of units is proposed which will achieve a key objective for the Planning Scheme.

### **2.4 Design & Layout**

The Planning Authority generally considers that the layout of the scheme including built form and building height is consistent with the Planning Scheme. It is considered that the visual impact of the proposed development would be acceptable.

### **2.5 Connectivity / Permeability**

The Planning Authority generally considers that the movement and street network proposed is largely compliant with the Planning Scheme. The SDCC Roads Department has confirmed that the proposed layout conforms closely to the Planning Scheme roads hierarchy.

Clarification was sought in relation to the northern strategic pedestrian / cycle route. A response to this is set out in Section 5 of this Report.

### **2.6 Street Design**

The Planning Authority generally considers that the approach of the proposed development in terms of street designation is consistent with the Planning Scheme.

Clarification was sought in relation to the detailed design of certain streets. A response to this is set out in Section 5 of this Report.

### **2.7 Parking**

The Planning Authority generally considers that the quantum of car and bicycle parking complies with the requirements of the Development Plan and the Planning Scheme.

## 2.8 Water Services

No significant issues were raised by the SDCC Drainage Department in relation to water supply, foulwater drainage subject to appropriate conditions being attached to any grant of permission.

Clarification was sought in relation to the use of SuDs in the public open spaces. As response to this is set out in Section 5 of this Report.

## 2.9 Landscaping / Public Open Space

No significant issues were raised by the SDCC Drainage Parks in relation to public open space. It was noted that significant open space has already been permitted under SDCC Reg. Ref. SDZ21A/0022. It is considered that the communal areas to serve the apartments / duplexes is acceptable.

Clarification was sought in relation to the maintenance of the proposed eastern public open space. A response to this is set out in Section 5 of this Report.

## 2.10 Other Items

No issues were raised by the Planning Authority in relation to Aerodromes and noise.

## 2.11 Environmental Impact Assessment

The Planning Authority considers that the need for an Environmental Impact Assessment (EIA) can be excluded. The Planning Authority concluded that: -

*“Having regard to the modest nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.”*

## 2.12 Screening for Appropriate Assessment

In carrying out a screening for an Appropriate Assessment, the Planning Authority concluded that: -

*“... the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on the above listed European sites or any other European site, in view of the said sites’ conservation objectives.”*

### 3 DESIGN MODIFICATIONS ARISING FROM THE APPLICANT'S RESPONSE

For the convenience of the Planning Authority, the following summarises the design amendments made by the Applicant in response to the Further Information Request: -

- The number of units has increased from 385no. units to 395no. units arising from the distribution of residential density between Sector 1 and Sector 2.
- R120 Frontage has been amended as follows: -
  - Apartment Blocks 2 has been moved south of the Clonburris Link Road and Terrace 1 (formerly Terrace 4) has moved north of the Clonburris Link Road.
  - The footprint of both Apartment Block 1 and 2 have been adjusted including the number of units per Block: -
    - Apartment Block 1 accommodates 50 no. units (previously 48no. units).
    - Apartment Block 2 accommodates 64 no. units (previously 56no. units).
  - Omission of the single storey Tenant Amenity Building.
  - The road layout and communal space to the east of Apartment Block 1 and Terrace 1 has been adjusted to relate to the revised buildings layouts.
  - The layout of Local Street 5 has been adjusted arising from the relocation of Apartment Block 1.
  - Apartment Block 2 now includes a communal roof terrace and an area of communal open space at ground floor level.
- The western end of Terrace 2 (formerly Terrace 1) now includes 2no. 3 storey duplexes to bookend the terrace.
- 2no. 3 storey duplexes at the western-end of Terrace 7 have been omitted and replaced with a bicycle / waste store / sub-station.
- Housing Block 3 has been adjusted to omit in-curtilage car parking and provide on street parking.
- Housing Blocks 3, 4, 5, 6 & 7 have had a number of incremental adjustments arising from the following: -
  - Retention of the southern boundary, omission of previously proposed ball netting & fences and subsequent adjustment of Local Street 4 away from the retain hedgerow.
  - Omission of in-curtilage car parking and provide on street parking on Local Street 2 & 3 and Intimate Street 2.
  - Additional of bay windows & minor changes to windows on gable elevations of house types B1, C, F3 & D2A.
- Road layout of Local Street 1, 2, 3, 4, 5, 6, 7, 8 & 9 have been adjusted to include additional street trees. This has resulted in a loss of 41no. car parking spaces across the application site.
- 497no. car parking spaces proposed (previously 538no.).
- 797no. bicycle parking spaces proposed (previously 878no.).

We enclose herewith for the convenience of the Planning Authority a revised set of planning drawings and RFI Response Booklet, prepared by Burke Kennedy Doyle Architects, which illustrate the modifications set out above. Furthermore, arising from the incremental adjustment to the Site Layout as a result of the request for Further Information the following has also been provided: -

- Updated Landscape Masterplan, prepared by Bradby Shipman Martin Built Environment Consultants.

- Updated Public Lighting Plan, prepared by Sabre Electrical Services Limited.
- Updated Roads Drawings, prepared by Waterman Moylan Consulting Engineers.
- Updated Drainage Drawings, prepared by Waterman Moylan Consulting Engineers.

Please refer to Section 11 of this Report for a full list of the updated documentation submitted with this response to the request for Further Information.

#### **4 CONSULTATION WITH SOUTH DUBLIN COUNTY COUNCIL**

Prior to the submission of this Further Information response, a meeting was held with South Dublin County Council, including attendees from the Planning, Roads and Parks Department on 19 July 2023. The purpose of the meeting was to set out an overview of the Applicant's intended response, to ensure as far as possible that mutual agreement could be reached with the Planning Authority. Generally, the proposed responses to the Further Information Items were well received with no significant issues raised.

Subsequent to that meeting this office engaged with the Senior Executive Planner, Planning Department with regard Item 2B (distribution of units between sub-sectors). Revisions were proposed to the distribution of units between the Sub-sectors, including a minor increase in the number of units proposed. The Planning Department reverted to this office by email on 14 September 2023 and stated that it appeared that the revised layout *"demonstrated that the overall application would be within the required density range"*.

The Applicant also engaged with the SDCC Housing Department prior to the submission of this response to the request for Further Information. Arising from the minor increase in units proposed a revised Part V Validation Letter was issued by the SDCC Housing Department on 3 November 2023 and is enclosed with this responses to the request for Further Information.

## 5 RESPONSE TO FURTHER INFORMATION REQUEST ITEMS 1–4

### 5.1 FI Item 1 – Planning Scheme Compliance

(a) The applicant has summarised the phasing requirements applicable up to Phase 1A 0-1,000 units. There are a total of 1,995 units either granted permission or included in planning applications currently under consideration. If all of these units were granted, constructed and occupied, they would take up the vast majority of the phasing allowance up to 2,000 units when the Phase 1B (1, 001-2,000 units) requirements must be complied with. The applicant has provided a rationale for the duration of the permission to be 7 years, which would make it more likely that development would take place in a later phase. The applicant is requested to provide details on Phase 1B to enable the Planning Authority to allocate sufficient dwellings between landowners and ensure the delivery of the required infrastructure.

(b) 385 units are proposed under the current application. No indication is given as to how many are located within subsectors S1 and S2 and the applicant is requested to clarify this. It is also noted that there is a 220KV power lines traversing the site. The applicant is requested to set out how undergrounding of these cables may impact phasing / delivery of the houses.

(c) The applicant is requested to clarify whether there are any single aspect north facing apartments.

(d) The scheme indicates a strategic cycle route to the north of the local street at the north of the site. It is not apparent that this has been included in the proposed layout and the applicant is requested to provide a revised layout indicating the cycle route.

(e) Intimate Local Street 2: South end of street widens to 22.6m between frontages with perpendicular parking. The applicant is requested to redesign this portion of the street to ensure in keeping with scheme road layout and requirements for intimate local streets.

(f) The applicant is requested to provide revised elevations, increasing dual frontage recommended for the following units:

- B1 (handed), B4 (handed), B4 (non-handed), C1 (handed), C1 (non-handed), F2 (handed), F2 (non-handed)

(g) The applicant is requested to consider whether own door units can be provided within the apartments.

(h) BTR is generally applied to apartment blocks. The applicant is requested to set out how the proposed development complies with the Department of Housing, Local Government and Heritage “Regulation of Commercial Institutional Investment in Housing”, May 2021 guidelines which includes a clear rationale and justification for the proposed housing mix and demonstrate that the proposed development would not result in the displacement of individual purchasers and/or social and affordable housing including cost rental housing.

#### 5.1.1 Applicant’s Response to Item 1(A) – Phasing

The following is the position with regard to units applied for and / or permitted in Clonburris at the time of responding to the Request for Further Information.

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 January 2023	563	944
SDZ22A/0010	Kelland Homes Ltd.	Clonburris Urban Centre & South East	2-May-23	Commenced August 2023	294	1,238

<b>SDZ22A/0017</b>	Cairn Homes Properties Ltd.	Clonburris South West	16-May-23	Granted Permission	157	1,395
<b>SDZ22A/0018</b>		Clonburris Urban Centre & South West	31-Oct-23	Granted Permission	594	1,989
<b>Proposed Development</b>	Clear Real Estate Holdings Limited	Adamstown Extension	N/A	Response to Further Information	395	2,384
<b>Potential Cumulative No. of Units</b>						<b>2,384</b>

The main infrastructure permitted under SDCC Reg. Ref. SDZ20A/0021 has gone to tender and the works have commenced. The infrastructure is funded under Urban Regeneration and Development Fund (URDF).

The Applicant sits on a Board together with Cairn Homes, Kelland Homes and South Dublin County Council to manage the overall implementation and co-ordination of the development of the Clonburris SDZ.

The Applicant is working closely with adjoining Landowners, including South Dublin County Council, to deliver the strategic infrastructure required in Clonburris. In this regard, the main road infrastructure, cycle paths, and adjoining parkland to the site will be complete prior to the occupation of any units. As part of this strategic delivery, the Applicant has committed to delivering the following minimum units within the timelines denoted below. These minimum targets have been agreed with all the major Landowners in Clonburris, including South Dublin County Council. Please see the Commencements and Occupations agreed between landowners below (Figure 2).

COMMENCEMENTS (MIN)										
YEAR	2023		2024		2025		2026		2027	
HALF YEAR	H1	H2								
UNITS				34	34	34	34			34

OCCUPATIONS (MIN)										
YEAR	2023		2024		2025		2026		2027	
HALF YEAR	H1	H2								
UNITS					20	20	29	29	34	

End of 2027: 170no. Units Commencements & 132no. Occupations.

**Figure 1:** The Applicant's Commencement & Occupation Schedule.

Commencements (min)								
Year	2023		2024		2025		2026	
Half Yr	H1	H2	H1	H2	H1	H2	H1	H2
Cairn	133	206	147	147	146	110	83	
Kelland	4	26	30	30	30	30	30	
SDCC		118	65	66	66	66		
Quintain				34	34	34	34	
sub total	137	350	242	277	276	240	147	0
Accumulative	137	487	729	1006	1282	1522	1669	1669

Occupations (min)								
Year	2023		2024		2025		2026	
Half Yr	H1	H2	H1	H2	H1	H2	H1	H2
Cairn		80	161	161	154	154	131	131
Kelland			21	42	38	38	15	15
SDCC			59	59	66	66	66	65
Quintain					20	20	29	29
sub total	0	80	241	262	278	278	241	240
Accumulative	0	80	321	583	861	1139	1380	1620

Figure 2: Clonburris Landowners Commencement & Occupation Schedule.

As such, the Applicant in conjunction with the other Clonburris Stakeholders have agreed the number of constructed and occupied units per Phase of the Clonburris SDZ and will collectively remain within Phase 1A initially. The necessary infrastructure will be delivered in tandem to allow commensurate development into Phase 1B collectively.

### 5.1.2 Applicant's Response to Item 1(B) – Unit Allocation per Sub-sector & 220KV Power Lines

#### Unit Allocation per Sub-sector

The response to Item 1B of the request for Further Information has resulted in changes to the layout along the western portion of the site adjacent the R120. Broadly this has resulted in: -

- The number of units has increased from 385no. units to 395no. units arising from the distribution of residential density between Sub-sector 1 and Sub-sector 2.
- R120 Frontage has been amended as follows: -
  - Apartment Blocks 2 has been moved south of the Clonburris Link Road and Terrace 1 (formerly Terrace 4) has moved north of the Clonburris Link Road.
  - The footprint of both Apartment Block 1 and 2 have been adjusted including the number of units per Block: -
    - Apartment Block 1 accommodates 50 no. units (previously 48no. units).
    - Apartment Block 2 accommodates 64 no. units (previously 56no. units).
  - The Tenant Amenity Building has been omitted.
  - The road layout and communal space to the east of Apartment Block 1 and Terrace 1 has been adjusted to relate to the revised buildings layouts.
  - The layout of Local Street 5 has been adjusted arising from the relocation of Apartment Block 1.
  - Apartment Block 2 now includes a communal roof terrace and an area of communal open space at ground floor level.

Figure 3 (below) shows extracts from 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 3:** Extract from Tables 2.1.5 and 2.1.8 of the Planning Scheme relating to target units / density requirements.

With regard to the transfer of residential floorspace, the Planning Scheme states that: -

*“Subject to no net loss of units within a Development Area and the achievement of the built form objectives, the Planning Authority may allow up to 10% of the maximum residential units allocated in any Sub Sector to be transferred to an immediately adjacent Sub Sector.”*

The Planning Scheme goes on to state that: -

*“Development within each Sub Sector shall be consistent with the density margins set out in Table 2.1.8. In the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.”*

Place	Development Areas	Sub-Sector	Gross Areas (ha.)	Net Area (ha.)	Average Net Density - Low Margin (-5 DPH)	Average Net Density - High Margin (+5 DPH)	Total Dwellings (Low Margin)	Total dwellings (Target)	Total Dwellings (High Margin)
ADAMSTOWN EXTENSION	Adamstown Extension	AE-S1		2.19	43	53	94	105	116
		AE-S2		7.00	43	53	301	338	371
Adamstown Extension Sub Totals			9.19	9.19			395	442	487

**Figure 4:** Extract from Tables 2.13.1 of the Planning Scheme relating to target units / density requirements.

Having liaised with the Planning Department prior to the submission of this response to the request for Further Information it was confirmed that up to 10% of units could be transferred from one Sub-sector to an immediately adjacent Sub-sector (See Section 4 above). In the context of the application site, it is proposed to transfer allocated units from Sub-sector 2 to Sub-sector 1. In broad terms, this would result in a maximum transfer as follows: -

- Max No. Units in Sub-sector 2: 371
- 371 @ 10% = 37no. units.
- As such, the Sub-sector 1 ‘maximum’ can increase to 153no. units (116 + 37 = 153).

We refer the Planning Authority to the RFI Response Booklet and associated Site Layout Drawings, prepared by Burke Kennedy Doyle Architects which shows the revised layout. In summary Sub-sector 1 now contains 137no. units and Sub-sector 2 contains 258no. units. Overall (Sub-sector 1 & 2), 395no. units are now proposed which achieves an average density of 52.6no. units per Ha.

As noted above, allowing for the transfer of up to 10% of the residential units from an immediately adjoining Sub-sector, Sub-sector 1 can accommodate up to 153no. Within the current layout, 137no. units are proposed which is approx. 90% of the potential number of units which could be allocated in Sub-sector 1. As such, the proposed number of units in Sub-sector 1 is compliant with the Planning Scheme when the flexibility with regard the transfer of residential floorspace is applied.

The portion of Sub-sector 2 now within the application site includes 258no. units over c. 5.15 Ha which equates to a density of c. 50.1no. units per Ha. As such, Sub-sector 2 falls within the allowable density range (43 – 53no. units per Ha) as set out in the Planning Scheme.

The 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. 81no. unit on the Lucan Pitch & Putt lands (indicative layout only), leading to a total of 339no. units in total for Sub-sector 2 which achieves a net density of 49.6no. units per Ha. As such, the future potential development of Lucan Pitch & Putt lands would continue to meet the required density set out in the Planning Scheme.

Overall, Sub-Sector 1 and 2 can accommodate approx. 476no. units which would achieve an average density of 51.8no. units per Ha. It has been clearly demonstrated that the transfer of residential units from Sub-Sector 2 to Sub-Sector 1 to accommodate the proposed layout as presented in this response to the Further Information request is compliant with the target units / density requirements of the Planning Scheme and will not result in a net loss of units within the overall Development Area.

For the convenience of the Planning Authority, the revised layout has been re-assessed in the context of the Apartment Guidelines (Section 6 of the Report), Development Plan (Section 7 of the Report) and Planning Scheme (Section 8 of the Report). Notwithstanding the revisions to the layout arising from the request for Further Information the scheme continues to meet the requirements set out in national and local planning policy guidance.

### **220KV Power Lines**

The Applicant has engaged with ESB Networks with regard the status of the 220kV power lines. It has been confirmed to the Applicant that the 220kV power lines that traverse the application site have been decommissioned and the associated 220kV pylons await removal / decommission. ESB Networks have confirmed that the pylon decommissioning is scheduled for 2024.

The 220kV power lines have been re-routed underground via ducting and cabling parallel to the northern boundary of the application site has been installed and commissioned.

The proposed development in Sub-sector 1 has been set back from the northern boundary of the application site to avoid conflict with the undergrounded powerlines.

We refer the Planning Authority to the updated Construction & Environmental Management Plan, prepared by AWN Consulting which provides details of the proposed phasing of the proposed development. In summary, construction will start in the north east to complete the amenity area / cycle infrastructure (Phase 1) working clockwise through Sub-sector 2 (Phase 2, 3 & 4) and finalising in Sub-sector 1 (Phase 5 & 6) – See Figure 5 below.

As such, the phasing of the development has been designed to facilitate pylon decommissioning (scheduled for 2024) without affecting the delivery of residential units (Phase 6 to be delivered in approx. 2027, i.e. where the 220kV pylons are currently located).



Figure 5: Extract from the Construction & Environmental Management Plan, prepared by AWN Consulting showing the proposed construction phasing of the proposed development.

**5.1.3 Applicant’s Response to Item 1(C) – North Facing Apartments**

There are no single aspect north facing apartments, we refer the Planning Authority to the enclosed RFI Response Booklet, prepared by Burke Kennedy Doyle Architects, which confirms that all north facing apartment units within apartments buildings are dual aspect. We note that all duplex units are proposed as dual aspect.

**5.1.4 Applicant’s Response to Item 1(D) – Strategic Cycle Route**

In the first instance we refer the Planning Authority to the RFI Response Booklet, prepared by Burke Kennedy Doyle Architects and the Landscape Response, prepared by Brady Shipman Martin Landscape Architects.

As illustrated within the planning application dedicated cycle-route have been planned across the site in accordance with the Planning Scheme. To the north of the proposed application area, the pedestrian and cycle route runs parallel to the train-line, linking from the pedestrian and cycle bridge over the railway (north-east of site) to the Adamstown Rd (N52). The Planning Scheme illustrates a connection to the N52 to the north-east of the site which is not feasible to provide due to the c. 6m change of level from the existing green field level up to the N52 bridge level.

As part of the response to the request for Further Information the Application confirms that a spur connection can be provided in the north-west corner of the site to facilitate any potential future connection by others. We note that the landscaping works proposed to the northern portion of the site do not preclude the potential for any future connections in this area. Please refer to Figure 6 below showing details of the potential spur.



**Figure 6:** Extract from the RFI Response Booklet, prepared by Burke Kennedy Doyle Architects showing the location of the potential spur to facilitate any potential future connection by others.

### 5.1.5 Applicant's Response to Item 1(E) – Local Street 2

We refer the Planning Authority to the enclosed RFI Response Booklet, prepared by Burke Kennedy Doyle Architects which shows the redesign of the south end of Intimate Local Street 2 to ensure in keeping with scheme road layout and requirements for Intimate Local Streets.

The south end of Intimate Street 2 has been amended to remove perpendicular parking and now shows parallel parking to one side of the street only. The street profile in this location now matches the intimate street requirements set out in the Planning Scheme. The positions of houses along this section of intimate street have been adjusted to ensure the maximum separation distances are not exceeded.

### 5.1.6 Applicant's Response to Item 1(F) – House Type Elevations

We refer the Planning Authority to the enclosed RFI Response Booklet and associated House Type Drawings prepared by Burke Kennedy Doyle Architects which shows the revised elevations of units B1, B4, B4, C1, C1, F2, F2. These revised elevations include multiple windows on the front & gable elevations to ensure dual frontages are provided multiple windows on the front & gable elevations to ensure dual frontages are provided.

It is noted that House Type D2, which only occurs at one location on the Site Layout Plan was shown in error without gable windows to active the eastern elevation. Windows are now shown to this elevation to ensure passive surveillance of the bicycle storage areas adjacent to this residential unit. While this adjustment was not specifically required as part of the request for Further Information it was considered that it was important to address in terms of appropriate urban design nonetheless.

#### **5.1.7 Applicant's Response to Item 1(G) – Own Door Apartment Units**

We refer the Planning Authority to the enclosed RFI Response Booklet, prepared by Burke Kennedy Doyle Architects which outlines the rationale for why own door units cannot be feasibly provided within the apartments.

Due to the significant falling street levels along the R120 from the top of the bridge to the entrance to Clonburris Link Street providing own door access to the proposed Apartment Block 1 & 2 is not feasible. In order to service the apartment, car parking and plant spaces are provided below road level underneath the building which uses the contours of the site to semi-submerge the ground floor parking level.

Notwithstanding, all of the Duplex Terraces located along the R120 have own door access onto the street to provide animation and passive surveillance.

The buffer zone between the back of footpath and edge of building line also accommodates a series of stepped planters and appropriate landscaping to provide an attractive edge along the R120. We refer the Planning Authority to the enclosed Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants for further detail.

#### **5.1.8 Applicant's Response to Item 1(H) – Regulation of Commercial Institutional Investment in Housing**

Circular Letter NRUP 01/2023, was published by the Department of Housing, Local Government and Heritage on 13 July 2023. This Circular confirmed that transitional arrangements relating to Build-to-Rent typologies have been extended to Prospective Applicants that had requested, in writing, a formal pre-planning meeting with a Local Authority in accordance with Section 247 of the Planning & Development Act 2000, as amended on or before 21<sup>st</sup> December 2022 for a proposal within an SDZ involving 100no. or more units.

Formal pre-planning with South Dublin County Council for the proposed development was requested on 8 March 2022 with the first pre-planning meeting taking place on 4 April 2022 (Pre-App. Ref. PPSDZC01/22). As such, the Special Planning Policy Requirement (SPPR) 7 and 8 of the Apartment Guidelines (2018) continue to apply to the proposed development.

The Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities 2021 set out conditions which restrict the purchase of units to individuals, however, this excluded Build-to-Rent. The Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities were subsequently updated in 2023 omitting the distinction to Build-to-Rent. However, we respectfully contend that on the basis the proposed development meets the transitional requirements to avail of SPPR 7 & 8 relating to Build-to-Rent the previous provisions of the provision of the 2021 Guidelines would more reasonably apply.

Furthermore, as SPPR 7 & 8 of the Apartment Guidelines take precedent over other Guidelines. As the Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities 2023 do not contain any SPPRs the provision of Build-to-Rent duplex units for management by a single entity can be considered acceptable in this instance.

Notwithstanding the above, the Applicant respectfully considers that the inclusion of Build-to-Rent units would not result in the *“displacement of individual purchasers and / or social and affordable housing, including cost rental housing”*.

As an experienced developer of large land banks and new suburbs, the Applicant understands the need for providing a variety of product types alongside a mix of tenures to ensure a new town caters for all. In the context of the scale of the new town of Clonburris it is entirely appropriate that some of the homes we develop should be made available for rent for families who choose to rent rather than buy.

Of the 395no. units proposed, only 74no. (19%) are proposed to be designated as rental units. The Applicant is delivering a well-balanced mix between renters and owner-occupiers.

The proposed Build-to-Rent units will be designated as rental units that can be leased to private tenants, affordable tenants, cost rental, or social tenants, so it is respectfully submitted that there is no displacement of social and affordable housing including cost rental housing.

## 5.2 FI Item 2 – Streets & Landscaping

*1. Much of the hedgerow removal is considered unavoidable in order to deliver this development however, removal of Hedgerow H3 along with trees along the southern boundary is considered excessive and damaging to the local green infrastructure. The applicant is requested to provide revised plans to include the retention /enhancement of this hedgerow.*

*2. The applicant is requested to revise plans to include additional street trees on local street 2, 3, 9, 7. Currently only one side of street is planted.*

*3. The applicant is requested to provide revised plans to demonstrate the use of SUDS for water treatment, amenity and biodiversity. Please refer to SDCC SUDs Guide. Swale details to be revised to include min 1 meter width at base of swale and consider planting to increase amenity and biodiversity value.*

*4. The applicant is requested to redesign the area to the north of local street 6 to be fully planted with native tree mix.*

*5. Park: Arrangement / grouping of trees in the park area to be agreed with Public Realm (lcolleran@sdblincoco.ie) prior to resubmission. Where wildflower meadows are proposed sufficient space should be provided between trees/tree groups to allow for maintenance by large tractor with zero grazer. Avoid wildflower seed mixes for meadows. May be used in bioswales. Boundary detail to be agreed which excludes vehicles- maintenance entrance required.*

### 5.2.1 Applicant's Response to Item 2(1) – Southern Boundary

We refer the Planning Authority to the enclosed RFI Response Booklet and Site Layout Plan, prepared by Burke Kennedy Doyle Architects, and Landscape Response to RFI Booklet and Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants, which illustrates how the full extent of this hedgerow is now to be retained.

A Tree Survey and Planning Report and associated Arborist Drawings, prepared by Independent Tree Surveys Ltd. Accompanied the planning application. Brady Shipman Martin Built Environment Consultants engaged with Independent Tree Surveys Ltd. Prior to the submission of this response to the request for Further Information and generally noted that revised design will still provide for a greater range of trees and a greater canopy coverage across the site over the medium to long-term.

### 5.2.2 Applicant's Response to Item 2(2) – Local Street Design

We refer the Planning Authority to the enclosed RFI Response Booklet and Site Layout Plan, prepared by Burke Kennedy Doyle Architects, and Landscape Response to RFI Booklet and Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants, which illustrates how Local Street 2, 3, 9, 7 have been redesigned to align with Planning Scheme street diagrams. All streets are now fully compliant with the Planning Scheme.

We refer the Planning Authority to the revised Outdoor Lighting Report and Public Lighting Layout Plans, prepared by Sabre Electrical Services Ltd. The public lighting proposals have adjusted to align with the revised street layouts.

### 5.2.3 Applicant's Response to Item 2(3) – SuDs

We refer the Planning Authority to the Landscape Response to RFI Booklet, prepared by Brady Shipman Martin Built Environment Consultants which confirm bio-swales will be provided to parkland boundaries following consultation with Laurance Colleran, SDCC Parks Department.

### 5.2.4 Applicant's Response to Item 2(4) – Local Street 6

We refer the Planning Authority to the Landscape Response to RFI Booklet, prepared by Brady Shipman Martin Built Environment Consultants which shows that the hedgerow to the northern boundary will be retained and additional native tree / woodland mix will be planted to the remaining space to the north of Local Street 6.

### 5.2.5 Applicant's Response to Item 2(5) – Eastern Public Open Space

Brady Shipman Martin Built Environment Consultants has engaged with Laurence Colleran, SDCC Park Department to determine a suitable approach. Trees will be grouped to allow the zero grazer to manoeuvre and cut the surrounding wildflower areas. We refer the Planning Authority to the Landscape Response to RFI Booklet and Landscape Drawings, prepared by Brady Shipman Martin Built Environment Consultants Landscape Architects for further details.

## 5.3 FI Item 3 – Archaeology

*1. The applicant is required to engage the services of a suitably qualified Archaeologist to carry out an Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Geophysical Survey and Archaeological Test Excavation to respond to this request for Further Information.*

*No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.*

*2. The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site (consulting appropriate documentary sources), and review all cartographic sources and aerial photographs for the area.*

*3. The Archaeological Geophysical Survey must be carried out under licence from the Department of Housing, Local Government and Heritage and in accordance with an approved method statement; note a period of 2-3 weeks should be allowed to facilitate processing and approval of the licence application and method statement.*

*4. The Archaeological Test Excavation must be carried out under licence from this Department and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.*

*5. Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings and the results of the Archaeological Geophysical Survey. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from this department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.*

*6. Having completed the work, the archaeologist shall submit a written report to this Department and the Local Authority describing the findings of the AIA including the results of the geophysical survey and test excavations. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.*

*7. Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. This Department will advise the Local Authority with regard to these matters. No decision should be made on this application until this Department and the Local Authority have had the opportunity to fully evaluate the findings of the AIA.*

### 5.3.1 Applicant's Response to Item 3 – Archaeological Impact Assessment

In response to this Further Information Request, Irish Archaeological Consultancy Ltd. (IAC) have been appointed by the Applicant, to carry out an Archaeological Impact Assessment (AIA).

Following the receipt of an appropriate License from the Department of Housing, Local Government and Heritage, a geophysical survey was carried out within the development site in June 2023 and archaeological test trenching took place from the 21<sup>st</sup> to 23<sup>rd</sup> June 2023.

We refer the Planning Authority to the Archaeological Impact Assessment (AIA), prepared by Irish Archaeological Consultancy Ltd. (IAC) which concludes the following: -

*"An archaeological assessment was carried out at Adamstown, Lucan, Co. Dublin in response to a Request for Further Information with regard to a planning application for a proposed residential development. This comprised a geophysical survey and a subsequent programme of test trenching which targeted greenfield areas and geophysical anomalies of archaeological potential. There are no recorded monuments located within the proposed development area, although the site of Adamstown Castle (DU017-029) lies c. 50m to the west. Evidence for extensive previous ground disturbances was noted during field inspection, and by the geophysical and testing surveys. The presence of two high voltage pylons and upstanding building in the northern field limited the extent of the ground investigations.*

*The archaeological assessment has identified two previously unrecorded areas of archaeological potential (designated as AA1 and AA2). These comprise two relatively small-scale archaeological features; a possible figure-of-eight kiln (AA1) and a circular spread of charcoal-rich material and heat-shattered stones (AA2)."*

We can confirm that this report has been issued to the Department of Housing, Local Government & Heritage as well as the Local Authority under this Further Information (correspondence enclosed). At the time of submitting this response to the request for Further Information no comments have been received from the Department or the Local Authority.

Appropriate mitigation measures for the small scale archaeological features which have been identified have been outlined in Section 4 of the AIA in accordance with industry best practice.

### 5.4 FI Item 4 – Transport & Mobility

**1. Applicant to provide a written rationale as to how the issues raised in the applicant Road Safety Audit were addressed.**

**2. EV car-parking provision must increase to a minimum of 108no. spaces in line with min 20% requirement in CDP 2022-28.**

**3. Applicant to submit revised layout showing visitor bicycle parking covered in line with the National Cycle Manual.**

**4. Applicant to provide details of how the Greenway that follows the western rail corridor will be continued under the road/rail bridge to the NW corner of the subject site.**

#### 5.4.1 Applicant's Response to Item 4(1) – Road Safety Audit

We refer the Planning Authority to the Additional Information Civil Engineering Response – Transport Planning, prepared by Waterman Moylan Consulting Engineers which identifies how each design issues raised in the Road Safety Audit is to be addressed.

#### 5.4.2 Applicant's Response to Item 4(2) – EV Parking

We refer the Planning Authority to the enclosed RFI Response Booklet and Schedule of Accommodation, prepared by Burke Kennedy Doyle Architects, which provides a breakdown of EV car parking provisions for the revised layout. As the request for Further Information has led to layout changes there has been a reduction of 41no. overall car parking spaces from application stage leaving a total of 497no. car parking spaces.

In line with minimum requirements set out in the Development Plan a total of 20% of the overall parking has been provided for EV car-parking, as such a total of 102no. EV car parking spaces are provided.

#### **5.4.3 Applicant's Response to Item 4(3) – Visitor Bicycle Parking**

We refer the Planning Authority to Drawing No. 6268-P-702 'Bicycle Shelter Details – Type 3, 4 & 5', prepared by Burke Kennedy Doyle Architects, which provides updated drawings that now includes covered visitor bicycle parking areas, in line with the National Cycle Manual.

#### **5.4.4 Applicant's Response to Item 4(4) – Northern Cycle Route**

In the first instance we refer the Planning Authority to the RFI Response Booklet, prepared by Burke Kennedy Doyle Architects and the Landscape Response, prepared by Brady Shipman Martin Landscape Architects.

As illustrated within the planning application dedicated cycle-route have been planned across the site in accordance with the Planning Scheme. To the north of the proposed application area, the pedestrian and cycle route runs parallel to the train-line, linking from the pedestrian and cycle bridge over the railway (north-east of site) to the Adamstown Rd (N52). The Planning Scheme illustrates a connection to the N52 to the north-east of the site which is not feasible to provide due to the c. 6m change of level from the existing green field level up to the N52 bridge level.

As part of the response to the request for Further Information the Application confirms that a spur connection can be provided in the north-west corner of the site to facilitate any potential future connection by others. We note that the landscaping works proposed to the northern portion of the site do not preclude the potential for any future connections in this area. Please refer to Figure 6 above showing details of the potential spur.

## 6 SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, GUIDELINES FOR PLANNING AUTHORITIES (2023)

For the convenience of the Planning Authority, we further set out below the compliance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023), following the design amendments made by the Applicant in response to the Further Information Request (relocation and re-design of the apartment blocks and relocation of duplex units).

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 National Planning Framework – Ireland 2040 (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.

### 6.1 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. 71no. duplex / apartment units with three or more bedrooms are proposed making up c. 18% of the overall mix of units.

### 6.2 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 Housing Quality Assessment (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	55	48.9 – 53.9	45
2 Bed Apartment – 3 Person	22	64.2 – 64.7	63
2 Bed Apartment – 4 Person	37	81.5 – 81.9	73
2 Bed Apartment (1 Storey)	50	85.6 – 87.0	73
3 Bed Duplex (2 Storey)	71	117.9 – 135.5	90
2 Bed Duplex (2 Storey)	21	113 – 114	73
<b>Total</b>	<b>256</b>		

### 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 Apartment Guidelines. Overall, 60% of the proposed apartment / duplex units exceed the Apartment Guidelines minimum requirements (i.e. 10% larger). A HQA, prepared by Burke Kennedy Doyle Architects, confirms this.

### 6.3 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. Overall, 76% of the proposed apartment / duplex units are dual aspect. A HQA, prepared by Burke Kennedy Doyle Architects, shows the proportion of dual aspect apartments / duplexes.

#### 6.4 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.”*

The ground floor duplex / apartments have a floor to ceiling height of 2.7m, thus complying with the above standard.

Apartment Block 2 now includes ground floor units and has a floor to ceiling height of 2.7m, thus complying with the above standard. Apartment Blocks 1 does not include ground floor apartment.

#### 6.5 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.

#### 6.6 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. Apartment Block 2 now includes a communal terrace. Based on the number of units proposed in the Apartment Blocks (114no.) there is a requirement for c. 688 sq. m of communal open space. The proposed development provides 687 sq. m of communal open space to serve the Apartment Blocks.

We refer the Planning Authority to the Drawing Nos. L1003 'Communal Open Space 1' and L1004 'Communal Open Space 2', prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further details on the layout and treatment of these communal open spaces.

Furthermore, we refer the Planning Authority to Section 4 of the RFI Daylight and Sunlight Analysis, prepared by IN2 Engineering Design Partnership, which assesses the impact of the proposed development on the sunlight availability to the amenity spaces. Generally it is concluded that the amenity spaces receive 84% to 100% sunlight which demonstrates the design quality of the spaces proposed.

For the Terraces of Duplex / Apartments, 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.

### **Car Parking**

The planning application was accompanied by a Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which provided a rationale as to why the site is considered as an intermediate location.

A total of 497no. car parking spaces are now proposed to serve the proposed residential units (previously 538no. car parking spaces). The proposed car parking provisions for apartments and duplexes are in line with the Apartment Guidelines in an effort to reduce overall parking standards. As noted earlier in the Report, arising from the request for Further Information there has been a reduction of 41no. car parking spaces in total. This relates predominately to the adjustments require to the street design.

We refer the Planning Authority to the Additional Information Response Transportation Planning, prepared by Waterman Moylan Consulting Engineers which demonstrates that the revised car parking provision remains in accordance with the provisions of the Apartment Guidelines.

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.

### **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, 797no. bicycle parking spaces are provided as part of the proposed development (previously 878no. bicycle parking spaces). This is a reduction of 81no. bicycle parking spaces from application stage as a result of the redesign of the Apartment Blocks and adjustment to street layouts. 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-702 'Bike Shelter Details' and Dwg. No. 6268-P-711 'Bin-Bike Store Details', prepared by Burke Kennedy Doyle Architects which identifies the locations of bicycle parking facilities.

We also refer the Planning Authority to the Additional Information Response Transportation Planning, prepared by Waterman Moylan Consulting Engineers which demonstrates that the revised bicycle parking provision remains in accordance with the provisions of the Apartment Guidelines.

### **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 RFI Daylight and 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 99% 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 8no. rooms 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 room/rooms that are well daylight, despite the assessed room being slightly below target.
2. Sunlight – The KLDs or bedrooms with below target SDA (Spatial Daylight Autonomy), are located in units that receive over 3 hours of sunlight (Medium exposure). Therefore, whilst the rooms were found to be non-compliant for daylight, their apartment units achieve the above 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 for private.

Section 6.3 and Appendix A of the RFI Daylight and Sunlight Analysis, prepared by IN2 Engineering Design Partnership identifies the specific compensatory measures applicable to each of the 8no. rooms which are non-compliant.

### **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.

Notwithstanding, the proposed development includes 74no. Build-to-Rent units as part of the overall tenure within the scheme. 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 74no. Build-to-Rent units and as such they are designed in accordance with the Apartment Guidelines.

We refer the planning authority to Applicant's Response to Section 5.1.8 of this Report which sets out the Applicants response to Item 1(H) – Regulation of Commercial Institutional Investment in Housing, for further details on these Build-to-Rent units.

Arising from the request for Further Information the Tenant Amenity has been omitted. In order to comply with the Build-to-Rent provisions we invite the Planning Authority to attach a suitable condition to agree the location for an amenity space within the ground floor of Duplex Terrace 2.

## 7 SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028

For the convenience of the Planning Authority, we further set out below the compliance with the South Dublin County Development Plan 2022 – 2028, following the design amendments made by the Applicant in response to the request for Further Information .

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 395no. 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 Coolsuddan (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.

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.

Arising from the request for Further Information the existing southern boundary (adjacent Lucan Pitch & Putt lands) has now been retained. Additionally, a number of the street layouts have been adjusted with associated changes to the landscaping (including additional street trees).

We refer the Planning Authority to the response to Item 1(e) and Item 2 in Section 5 of this Report for responses to landscaping and street design as well as the updated Landscape Masterplan and Landscape Design Report, prepared by Brady Shipman Martin Landscape & Built Environment Consultants.

## 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 395no. dwellings, of which 176no. are 3-bedroom and 34no. are 4-bedroom units. Therefore, approximately 44% of the proposed units are at least 3-bedrooms, which is above the minimum 30% noted in H1 Objective 12. There are 74no. 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 (2023).

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 revised Site Layout Plans, prepared by Burke Kennedy Doyle Architects as well as the revised Landscape Drawings, 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.

**Table 8.2:** Public Open Space Standards

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

**Figure 7:** Extract from Table 8.2 of the Development Plan outlining public open space standards.

The proposed development continues to provide 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. This has not changed on foot of request for Further Information. In response to Item 2(5) of the Request for Further Information (see Section 5 above) trees will be grouped to allow the zero grazer to manouver and cut the surrounding wildflower areas (as agreed in principle with Laurence Colleran, SDCC Park).

**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
Four bedroom or more	110 sq m	70 sq m

**Table 3.21:** Minimum Standards for Apartments

Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage
Studio	37 sq m	4 sq m	4 sq m	3 sq m
One bedroom	45 sq m	5 sq m	5 sq m	3 sq m
Two bedrooms (3 person)	63 sq m	6 sq m	6 sq m	5 sq m
Two Bedrooms (4 person)	73 sq m	7 sq m	7 sq m	6 sq m
Three bedrooms (5 person)	90 sq m	9 sq m	9 sq m	9 sq m

**Figure 8:** 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 2,162sq. m of communal open space proposed for the apartment and duplex 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 Drawing Nos. L1003 'Communal Open Space 1' and L1004 'Communal Open Space 2', prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further details on the layout and treatment of these communal open spaces.

## 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 9:** 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 497no. car parking spaces are is provided at street and a portion in the undercroft of Apartment Block 1. 102no. 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 Additional Information Civil Engineering Response Transportation Planning, prepared by Waterman Moylan Consulting Engineers for further discussion in relation to car parking provision.

## 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 13.24:** Minimum Bicycle Parking/Storage Rates

Category	Land-Use	Long Term	Short Stay
<b>Accommodation</b>	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 10:** 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 797no. bicycle parking spaces. 122no. spaces for Electric Bicycles are also provided across the site.

The Schedule of Accommodation, prepared by Burke Kennedy Doyle Architects provides a breakdown of car and bicycle parking spaces provided.

We refer the Planning Authority to the Additional Information Civil Engineering Response Transportation Planning, prepared by Waterman Moylan Consulting Engineers for further discussion in relation to car parking provision.

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

For the convenience of the Planning Authority, we further set out below the compliance with the Clonburris Strategic Development Zone Planning Scheme 2019, following the design amendments made by the Applicant in response to the request for Further Information.

The site is subject to Clonburris 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 Clonburris SDZ Planning Scheme identify the areas zoned residential and the Permitted in Principle land uses.

Figure 2.1.2 | Land Use Area Map

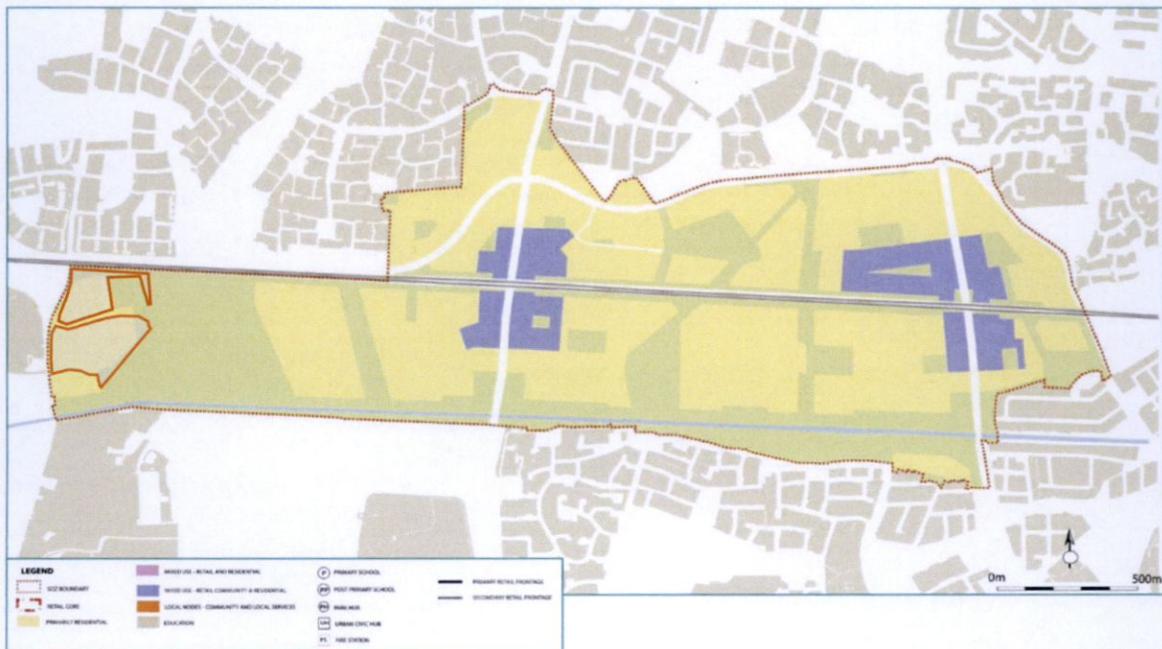


Figure 11: Land Use Area Map and Table from the Planning Scheme with residential-zoned lands in yellow and the application site highlighted in orange (Overlay by SLA).

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 395no. residential units 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 395no. 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 Sections 5.1 and 5.2 of this Report above for further details in relation to the changes proposed the layout arising from the request for Further Information.

### 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. This has been examined in section 5.1.3 above as part of this further information request.

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

We refer the Planning Authority to the response to Item 1(b) in Section 5 of this Report for responses to target units / density requirements of the Planning Scheme.

Overall, Sub-Sector 1 and 2 can accommodate approx. 476no. units which would achieve an average density of 51.8no. units per Ha. It has been clearly demonstrated that the transfer of residential units from Sub-Sector 2 to Sub-Sector 1 to accommodate the proposed layout as presented in this response to the Further Information request is compliant with the target units / density requirements of the Planning Scheme and will not result in a net loss of units within the overall Development Area.

### 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.

### 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, 182no. duplex / apartments and 74no. Build-to-Rent duplex apartments. Arising, the mix of units is as follows: -

- 1-Bed: 55 (13.9% of total units)
- 2-Bed: 130 (33% of total units)
- 3-Bed: 176 (44.6% of total units)
- 4-Bed: 34 (8.6% of total units)

We refer the Planning Authority to the Schedule of Accommodation 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. 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.

SDCC Roads Department are generally satisfied with the street network subject to adjustments required under Item 1(e) and Item 2 of the request for Further Information (See response in Section 5 of this Report).

We refer the Planning Authority to the Additional Information Response Traffic & Transport Assessment Report and Roads Drawings, prepared by Waterman Moylan Consulting Engineers and the Further Information Response Booklet, prepared by Burke Kennedy Doyle Architects for additional detail with regard the adjustments to the street layouts.

#### 8.2.1.1 Internal Movement Strategy

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.

SDCC Roads Department are generally satisfied with pedestrian / cyclist connectivity subject to clarification regarding the northern strategic cycle route under Item 1(d) and Item 4(4) of the request for Further Information (See response in Section 5 of this Report).

Due to significant difference in levels between the R120 and the application site the provision of a ramp is considered unfeasible. As part of the response to the request for Further Information the Application confirms that a spur connection can be provided in the north-west corner of the site to facilitate any potential future connection by others. We note that the landscaping works proposed to the northern portion of the site do not preclude the potential for any future connections in this area.

### 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 2.2.8 | Accessibility Levels for Identification of Car Parking Zones



Figure 13: 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).

The proposed development includes the provision of 497no. car parking spaces. The car parking standard in Zone 1 provide a ratio of 1.33no. spaces per unit while the car parking standards in Zone 2 provide a ratio of 0.8no. space per unit.

As such, considering the maximum car parking requirements is calculated as 578no. spaces the proposed car parking aligns with the provision of the Development Plan, Planning Scheme and Apartment Guidelines.

Furthermore, 102no. 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 497no. 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 797no. bicycle parking spaces where 656no. 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 Additional Information Civil Engineer Response – Transportation Planning, prepared by Waterman Moylan Consulting Engineers, in relation the traffic impact of the proposed residential development arising from the request for Further Information. The revised scheme does not impact on the surrounding road network negligible / within the capacity of the impacted junctions.

## 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.
- Arising from the request for Further Information the existing south boundary (adjacent Lucan Pitch & Putt lands) has now been retained.

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

Brady Shipman Martin Built Environment Consultants engaged with Independent Tree Surveys Ltd. Prior to the submission of this response to the request for Further Information and generally noted that revised design will still provide for a greater range of trees and a greater canopy coverage across the site over the medium to long-term.

### **8.3.1 Sustainable Urban Drainage**

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 the Additional Information Civil Engineer Response – Drainage Planning and Engineering 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 RFI Response Booklet, prepared by Burke Kennedy Doyle Architects for further detail on the amended proposed to the scheme as a result of the request for Further Information.

### **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.

We refer the Planning Authority to the RFI Response Booklet, prepared by Burke Kennedy Doyle Architects for further detail on proposed block size, scale, form and massing arising from the request for Further Information.

### **8.4.3 Building Height**

The general building height guidelines for the Planning Scheme are identified in Figure 19 below.



Figure 14: 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 – 8 storeys and as such is in line with the Building Height Strategy as presented in the Planning Scheme.



Figure 15: Extract from the RFI Booklet, 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 Further Information Response Landscape Booklet, prepared by Brady Shipman Martin Built Environment Consultants. In terms of residual effects on the landscape context it is generally concluded that *“in summary, the LVIA considered the proposed development would have no significant negative effects on the landscape or visual receptors in the receiving environment, and that as the proposal is compliant with the landscape / urban design-related principles and objectives of the Clonburris SDZ Planning Scheme, it can be considered an appropriate intervention in the landscape consistent with the planned and emerging character of the area. Effects on a range of sensitive viewpoints, residential receptors in the local receiving environment would be moderate at most during construction but neutral or positive during operation.”*

## **8.5 Services and Infrastructure**

With the exception of minor adjustments to the water supply, wastewater and surface water drainage network as a result of the adjustment made to the street layout there are no changes proposed to the water services proposed.

SDCC Drainage Department confirmed that there were no objections subject to appropriate condition being attached to any grant of permission.

We refer the Planning Authority to the Additional Information Response Drainage Response and Drawings, prepared by Waterman Moylan Consulting Engineers for further detail.

### **8.5.1 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 was submitted with 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. Notwithstanding the adjustments to the Apartment Block and some of the Terraces the same energy efficient principle will be applied.

### **8.5.2 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 revised 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 21 below.

Figure 2.10.1 | Open Space

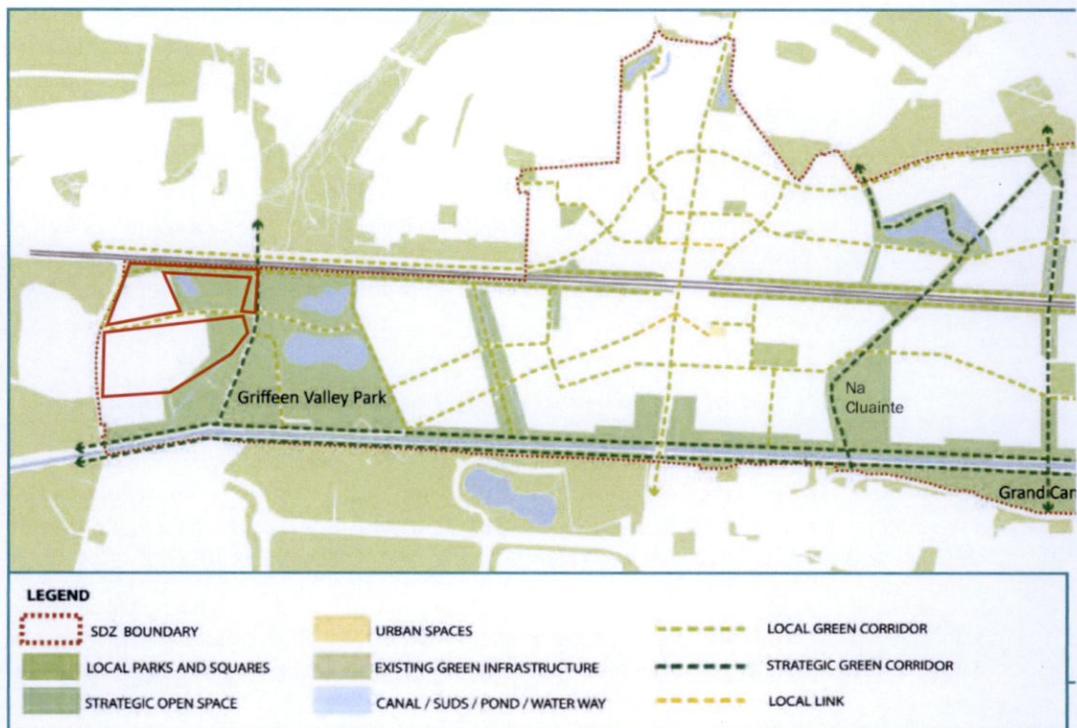


Figure 16: Extract from Figure 2.10.1 Open Space of the Planning Scheme with application site outlined in orange (Overlay by SLA).

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 Further Information Response Landscape Booklet and Landscape Drawings, prepared by Brady Shipman Martin Landscape & Built Environment Consultants for further detail in relation to the revised landscaping proposals.

## 8.7 Biodiversity and Natural Heritage

### 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. The existing southern boundary (adjacent Lucan Pitch & Putt lands) has now been retained (in response to Item 2(1) of the request for Further Information).

There is no change to the Ecological Impact Assessment (which includes a Habitat Management Plan), prepared by Brady Shipman Martin Landscape and Built Environment Consultants as submitted at planning application stage (confirmed in the Further Information Response Landscape Booklet in response to Item 2(1)). This provided 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.

We refer the Planning Authority to the accompanying Further Information Response Landscape Booklet and Landscape Drawings, prepared by Brady Shipman Martin Landscape and Built Environment Consultants, for details of the revised proposed tree planting arising from the adjustments to the street layouts.

### 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 Further Information Response Landscape Booklet and Landscape Drawings, prepared by Brady Shipman Martin Landscape and Built Environment for details of the additional hedgerow to be retained in response to the request for Further Information.

## 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, however, in response to the request for Further Information Request, Irish Archaeological Consultancy Ltd. have been appointed by the Applicant, to carry out an Archaeological Impact Assessment. We refer the Planning authority to Section 5.3.1 of this Report for further detail.

## 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.

We refer the Planning Authority to Section 5.1.1 of this Report for further details on phasing as required as part of the request for Further Information.

## **9 ENVIRONMENTAL ASSESSMENTS**

### **9.1 Construction & Environmental Management Plan**

An updated Construction & Environment Management Plan (CEMP), prepared by AWN Consulting is enclosed with this response to the request for Further Information.

### **9.2 Appropriate Assessment**

The minor revision to the proposed residential scheme have been reviewed by Brady Shipman Martin Landscape and Built Environment Consultants. The revised scheme does not change the conclusion of the Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants submitted with the planning application.

We refer the Planning Authority to the Further Information Response Landscape Booklet, prepared by Brady Shipman Martin Landscape and Built Environment for confirmation of same.

### **9.3 Ecological Impact Assessment**

We refer the Planning Authority to the Further Information Response Landscape Booklet, prepared by Brady Shipman Martin Landscape and Built Environment for confirmation that the conclusions of the Ecological Impact Assessment Report do not change as a result of the minor revision to the proposed residential scheme.

### **9.4 Screening for Environmental Impact Assessment**

The minor revision to the proposed have been reviewed by Stephen Little & Associates Chartered Planners & Development Consultants. Notwithstanding the minor increase of residential units now proposed (an increase of 10no. units) the scheme remain sub-threshold in terms of number of units and site area. As such, the minor revisions to the scheme do not give rise to any new consideration not already considered as part of the Environmental Impact Assessment Screening Report prepared as part of the planning application.

We respectfully submit that the assessment carried out by SDCC (i.e. no requirement for EIA) would not be altered by the revisions proposed to the scheme as a result of the request for Further Information.

## 10 CONCLUSION

We welcome the generally positive assessment of the proposed scheme by the Planning Authority, and this opportunity presented to the Applicant to provide Further Information in relation to specific matters raised by the Planning Authority.

We trust that the enclosed material provides sufficient comfort to the Planning Authority in respect of the proposed development, to enable it to arrive at a favourable decision.

It remains our opinion that the proposed development is compliant with national, regional and county level planning policy guidance for residential development and will deliver a high-quality residential scheme. This includes compliance with the policies, objectives and design standards of the South Dublin County Council Development Plan 2022 – 2028 as well as the Clonburris SDZ Planning Scheme. The proposed development will consolidate development in the Clonburris SDZ development area as a whole by developing the Adamstown Extension (AE) area to a high quality standard.

It is also our professional planning opinion that the proposals represent a carefully considered housing layout and that the design successfully delivers a sustainable density of residential development in an innovative and attractive manner which will provide a valued and interesting new neighbourhood for residents. No significant adverse planning impacts are predicted arising from the proposed development and the proposal is otherwise consistent with the proper planning and sustainable development of this particular area.

It is our understanding that the proposals included in this submission are therefore compliant with the provisions of the Planning Scheme and are consistent with the requirements of the Planning Authority also.

We confirm that we continue to 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

**6no. copies** of the following plans and particulars are included with this Further Information Response to South Dublin County Council: -

1. Further Information Planning Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
2. Part V Validation Letter from South Dublin County Council, dated 3 November 2023.
3. Correspondence with Department of Housing, Local Government & Heritage & SDCC Archaeology Department.
4. RFI Architectural Drawings, prepared by Burke Kennedy Doyle Architects (Please refer to enclosed drawing schedule).
5. RFI Response Booklet, prepared by Burke Kennedy Doyle Architects.
6. Schedule of Accommodation, prepared by Burke Kennedy Doyle Architects.
7. Housing Quality Assessment, prepared by Burke Kennedy Doyle Architects.
8. RFI Engineering Drawings, prepared by Waterman Moylan Engineering Consultants (Please refer to enclosed drawing schedule).
9. Additional Information – Civil Engineering Response – Transportation Planning, prepared by Waterman Moylan Engineering Consultants.
10. Additional Information – Civil Engineering Response – Drainage Planning, prepared by Waterman Moylan Engineering Consultants.
11. Landscape Response to RFI, prepared by Brady Shipman Martin Built Environment Consultants.
12. RFI Landscape Drawings, prepared by Brady Shipman Martin Built Environment Consultants (Please refer to enclosed drawing schedule).
13. Photomontages, prepared by Brady Shipman Martin Built Environment Consultants.
14. Archaeological Assessment, prepared by Irish Archaeological Consultancy Ltd.
15. Sunlight and Daylight Analysis, prepared by IN2 Design Partnership.
16. Construction Environmental Management Plan, prepared by AWN Consulting.
17. Resource Waste Management Plan, prepared by AWN Consulting.
18. Operational Waste Management Plan, prepared by AWN Consulting.
19. Presentation Ariel Views and CGIs, prepared by 3D Design Bureau.
20. Outdoor Lighting Report, prepared by SABRE Electrical Services Limited.
21. 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.

**STEPHEN LITTLE & ASSOCIATES**

3 November 2023