

# Planning Report

INCLUDING:

STATEMENT OF CONSISTENCY & RESPONSE TO LRD OPINION

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT SITE AT 72 BEAUMONT ROAD (D09 YD32) (AND LANDS TO THE REAR OF SAME) AND ADJOINING SITE AT THE JUNCTION OF BEAUMONT ROAD AND BEAUMONT GROVE (D09 XR63).

PREPARED BY MCG PLANNING  
ON BEHALF OF URBAN LIFE (BMD) LTD

September 2026

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## 1. Introduction

On behalf of the applicant Urban Life (BMD) Ltd, McGill Planning Limited have prepared this planning report to accompany this planning application made under Section 32D of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.

This Large-Scale Residential Development for 100 residential units is to be located on a site at Beaumont Road / Beaumont Grove / Grace Park Court / Ellenfield Road, Beaumont, Dublin 9. The site includes former properties at 72 Beaumont Road (D09 YD32) (and lands to the rear of same) and the adjoining site at the junction of Beaumont Road and Beaumont Grove (D09 XR63).



Figure 1 Aerial CGI of Proposed LRD

### Development Proposal and Statistics

The proposed development is as follows:

*“The development will consist of a residential development of 100 apartment/duplex units within 4 no. blocks ranging in height from 3 to 6 storeys. The overall residential mix will include 17 no. studio units, 45 no. 1-bed units, 27 no. 2-bed and 11 no. 3-bed units. All units will have private balconies or terraces with north, south, east or west orientation. The development will also include internal residential amenity space (with lobby/reception, parcel room, manager’s office and WC (c.120.1 sq.m in total)) at ground floor of the apartment block.*”

*Provision of 42 no. car parking spaces (including 2 no. accessible spaces, 1 no. car share space) all at surface level, 200 no. bicycle parking spaces (150 long-term resident spaces and 50 short-term visitor spaces), 2 no. motorbike spaces, communal open spaces (including play areas), hard and soft landscaping, and boundary treatments.*

*Vehicular, pedestrian and cyclist accesses will be from Grace Park Court and Beaumont Road to the south with associated upgrades to the public footpath. Provision of a pedestrian and cyclist route (and emergency access) through the site from Grace Park Court / Beaumont Road to Ellenfield Road with associated removal of existing boundary wall.*

*All associated site development works including import, export and reuse of material to achieve appropriate site levels, infrastructure and enabling works including water services provision and upgrades, public utilities, set down areas / loading bay, cycle parking areas/buildings, plant areas, green roofs, roof mounted photovoltaic (PV) panels, ESB substation, EV charging points and waste storage room."*

The key development statistics are set out in the table below:

| Development Proposal               | Site Statistics                                                                                           |
|------------------------------------|-----------------------------------------------------------------------------------------------------------|
| No. of Units                       | 100                                                                                                       |
| Unit Breakdown                     | 17 no. studios – 17%<br>45 no. 1-beds – 45%<br>27 no. 2-beds – 27%<br>11 no. 3 beds – 11%                 |
| No. of Blocks                      | 3 no. duplex/apartment blocks (3 storeys each) & 1 no. apartment block (6 storeys)                        |
| Site Area                          | 0.58 ha Net                                                                                               |
| Net Density                        | 172 dph                                                                                                   |
| Building Height                    | 3 to 6 storeys                                                                                            |
| Communal Open Space                | 1,266 sq.m Communal Open Space (net). 20.5% of the site area.                                             |
| Residential Internal Amenity Space | 101 sq.m net<br><br>(120.1 sq.m in total including lobby/reception, parcel room, manager's office and WC) |
| Car Parking                        | 42 no. car parking spaces (including 2 no. accessible spaces, 1 no. go car/car share space)               |
| Cycle Parking                      | 200 spaces (150 long term resident spaces and 50 short term visitor spaces).                              |

## 2. Site Description and Context



*Figure 2: Site Location (see architect's drawings for accurate red line).*

The application site is c.0.58ha net (c.0.61 gross including works across public road) and is located in the Whitehall / Beaumont area, Dublin 9, approximately 4.4km north of Dublin city centre. The site fronts onto a slip road off Beaumont Road and sides onto a tree-lined green verge along Beaumont Grove.

On the southwest side it is occupied by a bungalow and associated outbuilding with an address at no.72 Beaumont Road. Beaumont Drive-In a former commercial retail premises occupies the centre of the site, with associated storage buildings along the northwest boundary and an expansive hardstanding area. The remainder of the site along the northeast side is comprised of unkempt green areas.

The front and northeast side boundary are currently secured by a temporary security, while the remainder of the site is generally bounded by walls of varying heights.

The surrounding area is primarily characterised by residential properties of varying eras, including two-storey semi-detached housing along Beaumont Road and Beaumont Grove, two-storey terraced housing along Ellenfield Road and Glencorp Road and three-storey apartment buildings along Grace Park Court. Ground levels on site generally drop in an easterly direction by approximately 1m over a 70m distance with a gradual drop in levels in a southeast direction in the surrounding area.

There are no protected structures on the site and no conservation areas in the vicinity. The site is within a well-established residential suburban location on the north side of Dublin which is within walking distance of a multitude of services, exceptional public transport options and local amenity and employment opportunities. The Omni Park Shopping Centre and Dublin City university are located approximately 2km from the subject site.

Overall, it is considered that the site is well located, and a highly accessible location well served by public transport, bike and walking facilities providing connection to the employment, commercial, health and education services within the vicinity and wider City.

### Public Transport Accessibility

The nearest bus stops to the site are located on Beaumont Road. The closest stop is immediately adjacent to the subject development, with additional stops approximately 150 m (2-minute walk) from the site. These stops are served by bus routes 14 and 16.

Dublin Bus Route 14 links Beaumont with the LUAS Green Line Stop at Dundrum via Connolly Station, the City Centre and Rathmines. Services run at a frequency of 15-minute intervals up to 09:00, 12-minute intervals up to 15:30, 10 – 12 minutes intervals up to 19:30 and 15-minute intervals up to 23:30. On average, there are 5 services per hour in both directions.

Dublin Bus Route 16 links Dublin Airport with Ballinteer serving O'Connell Street, Harold's Cross and Terenure. Services run at a frequency of 10-minute intervals up to 09:30, 12-minute intervals up to 19:06 and 15 minutes intervals up to 23:30. On average, there are 5 services per hour in both directions.

There are also several bus routes which serve the site in the road network surrounding. Along Collins Avenue approximately 750m (10-minute walk), the subject development is served by bus route N4. Dublin Bus Route N4 was introduced by Bus Connects at the end of May 2022. Services generally operate at 10-minute intervals between 05:30 and 22:50 with 6 buses per hour in each direction.

The subject site is located approximately 500m from the N1/Swords Road, which is a Quality Bus Corridor (QBC), that is served by additional bus routes. There are optional walking routes to the bus stops on the N1/Swords Road as shown on the figure below including via Ellenfield Park.

When the BusConnects Network for the area is fully in place the site will be within 20m of the A1 Spine Route serving Beaumont to City Centre and Knocklyon Corridor (Stop ID 217 is located directly adjacent the site). The site will also be within 500 – 630m of the A2 (Dublin Airport to Dundrum via City Centre) and A4 (Swords to Dundrum via City Centre) Spine Routes (Stop ID 1641). The A2/A4 bus route stop can be accessed from the site via Ellenfield Park (DCC Public Park) (500m) or via Ellenfield Road/Shantalla Road (630m).

The frequency of the A-Spine services will result in peak time services going to and from the City Centre at 1 every 3-4 minutes along the Swords Road. The site is demonstrably well served by public transport, including a BusConnects Core Bus Corridor and multiple frequent bus services.

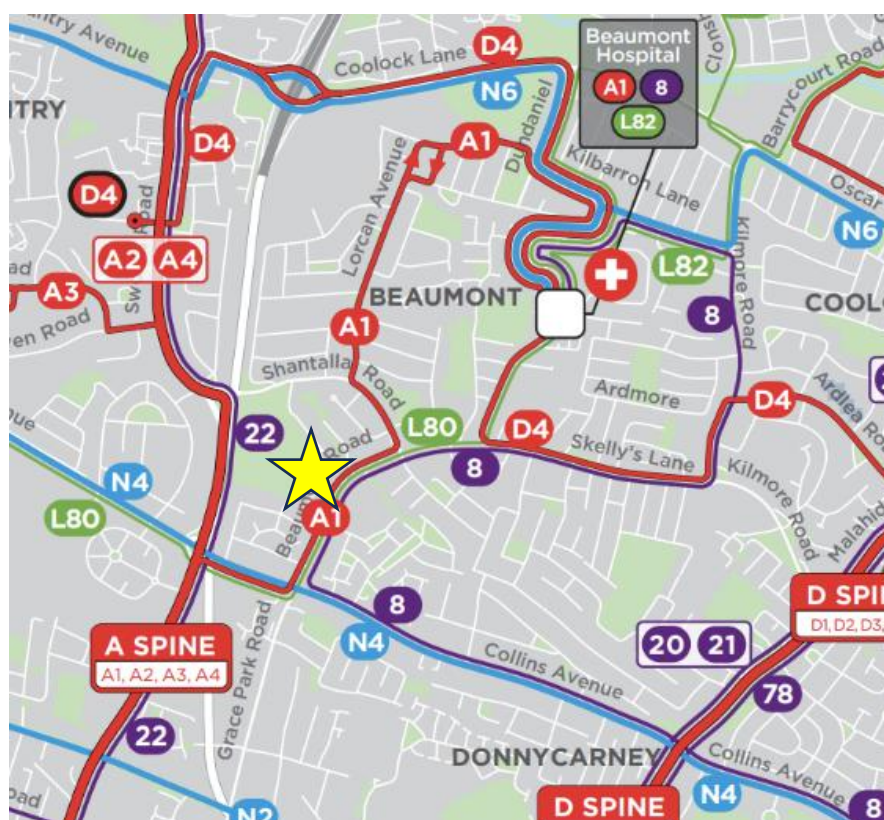
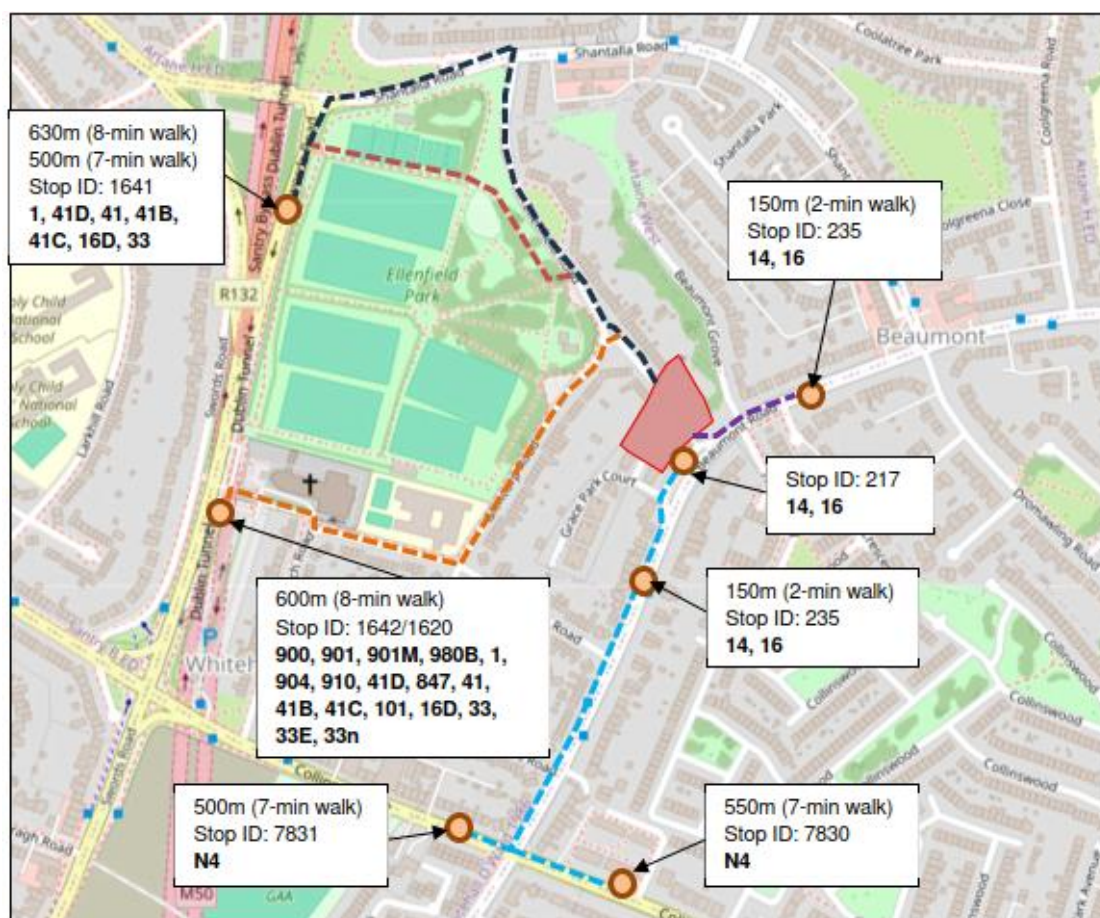


Figure 3: Site Location in Relation to Current Bus Connectivity and within the Complete BusConnects Network

## Social Infrastructure

The site has excellent access to existing Social & Community Infrastructure including schools, parks, healthcare, retail and other facilities.

A baseline study undertaken identified a significant range of services and facilities which contribute to quality of life for local residents, comprising 95 No. social infrastructure facilities were identified as part of this Audit within a radius of 1 km of the subject site.

Overall, healthcare, sports and recreation, community, education are all well-represented within the area and cater for the existing and proposed new residential community. The proposed development also includes passive and active open spaces as well as pedestrian links throughout the site.



Figure 4: School Locations in the Vicinity of the Application Site

A Community and Social Audit has been completed with regard to national, regional and local policy relating to the provision of suitable community facilities. Consideration has also been made to the policies on social and community infrastructure in the Dublin City Development Plan 2022–2028. The recommended types of facilities have been examined, and the result of this audit has identified that there is adequate existing capacity of these services and facilities within a reasonable catchment of the subject site. It is concluded that the existing school provision in the area is sufficient to cater for the needs of the current and future population of the area and the proposed development will be adequately catered for both in terms of school and childcare provision.

### 3. Planning History

#### Application No. 1

|                         |                                                           |
|-------------------------|-----------------------------------------------------------|
| <b>Ref No.</b>          | DCC Ref. 2569/21                                          |
| <b>Decision</b>         | Refuse permission                                         |
| <b>Date of decision</b> | 04/06/2021                                                |
| <b>Ref no</b>           | ACP Reg. Ref: 310709-21<br>Remitted ACP Reg. Ref.: 321996 |
| <b>Decision</b>         | Grant of permission subject to conditions                 |
| <b>Date of decision</b> | 11/01/2022                                                |

Permission was granted, under condition, for a 6 storey, Build to Rent Apartment development comprising 93 no. units within 2 blocks ranging up to 6 storeys. The scheme originally proposed 99 units with Block A up to 8 storeys, but the Commissions reduced that Block down to 6 storeys, omitting 6 units.



Figure 5: Site Layout Ref. 2569/21 (ACP reg. ref. 310709)

It is noted that the previous ACP grant decision was Judicially Reviewed to the High Court and the decision of the ACP was quashed but has been remitted back for a new decision. The case reference for the new decision is PL29N.321996 and was due to be decided on 07/07/2025. It remains a live appeal.



Figure 6: Elevations Drawing (ACP reg. ref. 310709)

In relation to the permission granted (prior to Judicial Review) the following aspects noted by the ACP inspector are noted with relevance to the current proposal:

| Criteria                | Inspector's observation                                                                                                                                                                                                                                   |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Zoning                  | <i>"residential use is permitted in principle based on the land-use zoning objectives contained in the Development Plan and I am satisfied that it would provide for a sustainable use of the site".</i>                                                  |
| Density                 | <i>"the site can sustainably support a high density of apartments" and "The proposed density is appropriate at this location".</i>                                                                                                                        |
| Block arrangement       | <i>"I consider the proposed block arrangement to be an appropriate design response for the site, including the stepped building arrangement".</i>                                                                                                         |
| Pedestrian link         | <i>"satisfied that the provision of this pedestrian link would support planning policy and would not be detrimental to the safety and amenities of neighbouring residents or the character of the area".</i>                                              |
| Materials               | <i>"I am satisfied that the proposed use of brick would provide a robust, low maintenance and long-lasting finish to the buildings".</i>                                                                                                                  |
| Transitional height     | <i>"I have no issue with the transition in the building height for block B, which features six storeys".</i>                                                                                                                                              |
| General impact          | <i>"I am satisfied that the proposed development would not result in excessive overshadowing or overlooking of neighbouring properties and would have not have excessively overbearing impacts when viewed from neighbouring residential properties".</i> |
| Lighting for neighbours | <i>"the lighting impacts arising from the proposed development for neighbouring properties would not be sufficiently adverse to require amendments".</i>                                                                                                  |

|                   |                                                                                                                                                                |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Internal lighting | <i>"the lighting to the proposed development would adequately meet the residential amenity levels for future residents".</i>                                   |
| Communal space    | <i>"the proposed communal facilities and communal open space would be... suitable to serve the development and in accordance with the relevant standards".</i> |
| Parking ratio     | <i>"satisfied" that the location was "suitable for the proposed reduced ratio of car parking (0.36)".</i>                                                      |
| Traffic impact    | <i>"the proposed development would not be likely to have substantive impacts on traffic relative to the existing background traffic levels".</i>               |
| Drainage          | <i>"the proposed site services, including surface water proposals, to be satisfactory to serve the development".</i>                                           |
| Ecology           | <i>"the residual impact on local ecology would be no more than negligible".</i>                                                                                |
| Flood risk        | <i>"I am satisfied that the development would be at very low risk of flooding and it would not increase the risk of flooding to other lands".</i>              |

Dublin City Council Decision Reg. Ref. 2569/21

The reasons for refusal given in the original DCC refusal are also listed below and how these are addressed in the current proposal:

| <b><i>Reasons for refusal</i></b>                                                                                                                                                                                                                                                                                                                                        | <b><i>Current proposal's approach</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>1) Height, scale and massing are excessive; would detract from visual amenities. Proximity of Blocks A &amp; B to the boundary would be overbearing on 9 and 23B Ellenfield Road; contrary to Building Heights Guidelines (2020), Dublin City Development Plan 2016–2022, and proper planning/sustainable development.</i>                                            | Height and massing have been revised by stepping down upper floors. The previous 2 to 8 storey blocks are replaced with 3 storey duplex blocks adjoining the residential areas, and with a 6-storey apartment block has been placed to the southeast of the site.                                                                                                                                                                                           |
| <i>2) Insufficient residential amenity for future residents: poor access to communal amenity space from Block A; significant number of rooms have unsatisfactory average daylight factor without adequate compensatory measures; contrary to Apartment Design Standards (2020), Dublin City Development Plan 2016–2022, and proper planning/sustainable development.</i> | <p>The previous scheme was Build to Rent (BTR) which necessitated a more substantial provision of internal amenity space for future renters.</p> <p>The current scheme is not BTR and there are no minimum requirements for internal amenity space. Nevertheless a dedicated amenity space of over 100 sq.m is provided. This is in addition to significant communal open space provision within the development equating to over 20% of the site area.</p> |

|  |                                                                                                                                                                                                                                                                                                                                                                                  |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>All units are in designed in accordance with the S28 Planning Design Standards for Apartments, 2025.</p> <p>The current scheme provides a good distribution of open space within the development and all with good access from the proposed units.</p> <p>A Daylight/Sunlight Assessment is included with the current proposal which demonstrate high rate of compliance.</p> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Application No. 2

|                         |                      |
|-------------------------|----------------------|
| <b>Ref No.</b>          | DCC Ref. 3881/22     |
| <b>Decision</b>         | Refuse permission    |
| <b>Date of decision</b> | 28/06/2022           |
| <b>Ref no</b>           | ACP Reg. Ref: 314161 |
| <b>Decision</b>         | Refuse permission    |
| <b>Date of decision</b> | 14/10/2024           |

Permission was refused for the demolition of dormer bungalow and clearance of all commercial buildings and structures on site and construction of two Build-to-Rent (BTR) apartment blocks (A & B); to contain a total of 99 apartments and communal facilities, including car and bicycle-parking; and all associated site works.

The Planning Authority refused permission on the basis that the proposal was unacceptable in terms of height, residential amenity impacts, zoning compliance, and the standard of residential accommodation and supporting facilities.

The Authority considered the development to be of excessive height, stating that it was “*too tall*” having regard to Section 16.7 of the Dublin City Development Plan 2016–2022 and the Urban Development and Building Height Guidelines for Planning Authorities (2018).

It further concluded that the scheme would be overbearing, particularly in relation to Ellenfield Road, and that this impact would conflict with the intent of the Z1 zoning objective.

In addition, the Authority found the proposal to be substandard in overall quality and in the provision of residential support facilities, services and amenities. Specific deficiencies identified included poor access to communal open space for Block A, unsatisfactory Average Daylight Factor levels for a significant number of units, and broader non-compliance with the Design Standards for New Apartments (2020), including SPFR 7.



Figure 7: Site Layout Map (ACP reg. ref. 314161)



Figure 8: Elevations Drawing (ACP reg. ref. 314161)

The DCC reasons for refusal have been addressed in the current revision of this application, as follows:

| Reasons for refusal                                                                                                                                                                                                                                                                                                                                                                                                  | Current proposal's approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1) <i>Excessive height, massing and overall scale, and close proximity to site boundaries; contrary to DCDP 2016–2022 (Section 16.7) and the Urban Development and Building Height Guidelines (Dec 2018); would not successfully integrate with existing development; contrary to Section 28 Ministerial Guidelines and proper planning/sustainable development.</i>                                                 | Height and massing have been revised and now provide 3 no. 3 storey duplex blocks adjoining the residential areas, and a 6-storey apartment block has been placed to the southeast of the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2) <i>Height/scale/massing and proximity to boundaries would adversely impact adjacent amenities by overbearance, particularly from Ellenfield Road; contrary to Z1 objective to protect residential amenities; would seriously injure nearby amenity and be contrary to proper planning/sustainable development.</i>                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3) <i>Substandard residential amenity for future occupants (Build-to-Rent): overall quality/quantity of Residential Support Facilities and Residents' Services/Amenities is seriously substandard; poor access to communal open space from Block A; many units unsatisfactory for average daylight factor; overall amenity not enhanced; contrary to Apartment Standards 2020 (incl. SPPR 7) and DCDP 2016–2022.</i> | <p>The previous scheme was Build to Rent (BTR) which necessitated a more substantial provision of internal amenity space for future renters.</p> <p>The current scheme is not BTR and there are no minimum requirements for internal amenity space. Nevertheless a dedicated amenity space of over 100 sq.m is provided. This is in addition to significant communal open space provision within the development equating to over 20% of the site area.</p> <p>All units are in designed in accordance with the S28 Planning Design Standards for Apartments, 2025.</p> <p>A Daylight/Sunlight Assessment is included with the current proposal which demonstrate high rate of compliance.</p> |

The ACP reasons for refusal have been addressed in the current revision of this application, as follows:

| Reasons for refusal                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Current proposal's approach                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>1) Height, scale, massing and proximity to site boundaries would result in overbearing impacts on the amenities of existing adjacent residential properties, particularly on Ellenfield Road; contrary to the Z1 zoning objective to protect, provide and improve residential amenities under the Dublin City Development Plan 2022–2028; would seriously injure visual and residential amenities and be contrary to proper planning and sustainable development.</i> | Height and massing have been revised by stepping down upper floors. The blocks have been revised to provide 3no. 3-storey duplex blocks adjacent to the established residential developments and 1no. 6-storey apartment block furthest away from current residential development. |
| <i>2) Poor standard of sunlight and daylight to a significant number of proposed residential units, failing to meet the standards of the Dublin City Development Plan 2022–2028 and relevant BRE Guidance; would seriously injure the residential amenities of future occupants and be contrary to proper planning and sustainable development.</i>                                                                                                                      | A Daylight/Sunlight Assessment is included with the current proposal which demonstrate high rate of compliance.                                                                                                                                                                    |

#### Other relevant applications

| Application Ref. | Development                                                                                     | Location                                                                                                                                                                                                                  | Decision | Decision Date |
|------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------------|
| 317121           | BusConnects Swords to City Centre Bus Corridor Scheme (Launching in Autumn 2026)                | Swords to Dublin City Centre                                                                                                                                                                                              | Granted  | 19/06/2024    |
| 313289           | 472 no. apartments, crèche and associated site works                                            | “Hartfield Place”, Swords Road, Whitehall, Dublin 9                                                                                                                                                                       | Granted  | 16/11/2022    |
| 316108           | 853 no. residential units (240 no. houses, 613 no. apartments), crèche and ancillary site works | Oscar Traynor Road Site, bounded by Coolock Lane (R104) to the north, Castletimon estate to the east, Lorcan estate to the south and by the N1 to the west, south-east of M50 Junction 2 Interchange, Dublin 5 / Dublin 9 | Granted  | 11/07/2023    |

## 4. Planning Rationale

The current proposed development will comprise the following:

- A Large-Scale Residential Development of 100 no. residential units (17no. Studio, 45no. 1 bed, 27 no. 2 bed, 11 no. 3 bed) within 4 no. blocks comprising 3 no. 3-storey duplex blocks and 1 no. 6 storey apartment block. The apartment block will also include an internal residential amenity space (with lobby/reception, parcel room, manager's office and WC (c.120.1 sq.m in total)) at ground floor.
- All associated site development works, vehicular accesses, landscaping (including public and communal open space), boundary treatments, car and cycle parking, bin stores, substations and service provision.

This is a residential zoned site located within a long-established and well served suburban community. The site has access from Beaumont Road with ease of access to frequent bus services, shops, employment and community facilities. Accordingly, it represents a highly appropriate infill opportunity and an optimal site for delivering housing in a serviced, accessible and highly sustainable location.

### Overall Layout

The residential buildings are set out in four blocks ranging in height up to 6 storeys and which wrap around a main, central communal open space that is designed and structured around a series of seating and gathering areas, including picnic table sets that promote informal meeting and community activity. Bench seating is integrated along key pedestrian routes, overlooking the open space to enhance passive surveillance and amenity. Play areas are included and a central open lawn area offers space for informal play and recreation, ensuring flexibility of use and a sense of openness within the development.

The central space connects directly to the additional communal open spaces to the west and east, providing a continuous, legible, and accessible sequence of spaces. These areas support informal recreation, relaxation, and gathering while ensuring permeability through the site. Street trees, soft landscape buffers, and carefully designed lighting enhance comfort, safety, and visual character, while sustainable drainage and permeable materials contribute to environmental performance.

Vehicular access is provided from Grace Park Court / Beaumont Road with a dedicated surface car park located in the west of the development containing 40 car parking spaces. A second vehicular access to 2 no. accessible spaces adjoining the apartment building in the centre of the site is also proposed. This second access will also serve as a service access for deliveries. The main central area of the development is proposed to be a shared area for pedestrians and cyclists, with no proposed internal road connecting Beaumont Road to Ellenfield Road. Permeability at this location is now designed to cater for pedestrian and cyclist only, with the exception of the fire tender emergency route.



Figure 9 Proposed Site Layout Plan (Henry J Lyons)

## Density

The proposed net density of 172 uph (100 / 0.58 ha) is in line with national policy on compact growth and sustainable development. Table 3.1 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) states that “residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.” The proposed net density of 172 uph is in full compliance with this guidance.

While the proposed density represents an increase compared to the existing low-density, two-storey suburban residential development in the surrounding area, it is consistent with recent planning precedent in the vicinity. In particular, the Hartfield Place LRD (ACP ref. 313289) was recently granted permission for a development with a net density of 173uph in blocks ranging from 4 to 8 storeys.

It is also relevant to note that the previously refused scheme on this site (ACP ref. 310709), which proposed a net density of 171uph, was considered acceptable both by the Planning Authority and the ACP Inspector, due to the site’s central and accessible location and proximity to various public transport services.

## Unit Mix

The proposed unit mix breakdown is as follows:

| Unit Size    | No. Of Units | Percentage  |
|--------------|--------------|-------------|
| Studio       | 17           | 17          |
| 1 bed        | 45           | 45          |
| 2 bed        | 27           | 27          |
| 3 bed        | 11           | 11          |
| <b>Total</b> | <b>100</b>   | <b>100%</b> |

Table 2 Proposed Unit Mix

This proposed housing mix is in accordance with section 3.2 of the Apartment Guidelines 2025 which identify that “In the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development and the broader housing choices enabled by the SRDCSGs, restrictions in statutory plans relating to mix within apartment developments, are not *warranted other than in specific circumstances.*”

The existing wider area is generally characterised by low density two storey suburban housing providing three and four bed housing. Grace Park Court to the west of the site consists of 4no. 3-storey duplex blocks. The provision of more apartments, which are smaller in size, is reflective of the current demographic change in Ireland towards smaller household sizes. This proposal will provide for a greater diversity and choice of housing in this area overall and accommodate the needs of smaller households as set out in the Apartment Guidelines 2025.

## Dual Aspect

The proposal includes 38% dual aspect (38 units), which is in compliance with the Development Plan and well in excess of the minimum 25% requirement set out in SPPR 3 of the Apartment Guidelines.

## Housing Quality Assessment

A Housing Quality Audit prepared by Henry J Lyons is enclosed with the application. This sets out the apartment mix throughout the proposed development, the size of the apartments, the quantum of private open space, storage space, living/dining/kitchen areas, bedroom areas, and dual aspect. The Housing Quality Assessment demonstrates that the proposed development meets all the requirements of the Apartment Guidelines 2025.

## Building Height, Design, Scale and Massing

The proposed development consists of four blocks ranging in height from three to six storeys, designed to function as a landmark development, while reinforcing the landscaped interface to the adjoining green corridor. The blocks have been arranged to maximise daylight and sunlight to the apartments, and to ensure that the central shared courtyard and the communal open spaces achieve a high level of sunlight and usability.

The overall height and massing strategy ensures appropriate transitions, reinforces key site connections, and provides suitable setbacks from neighbouring residential areas.

The development will feature a variety of elevation treatments using a complementary palette of high-quality, durable materials to create visual interest and distinct character across the blocks. The proposed layout, building footprints, and detailed design, including careful consideration of scale, access, fenestration, and overlooking, ensure a coherent relationship between blocks and their surroundings.

### Daylight, Sunlight and Shadowing

A full '*Daylight, Sunlight and Overshadowing Study*' has been submitted with this application which outlines the analyses undertaken to quantify the Sunlight and Daylight performance of the proposed Beaumont Road development.

#### **Daylight to Proposed Development**

BS EN 17037-2018+A1-2021 National Annex (BRE Guide 3rd Edition) has been analysed (whilst IS EN 17037-2018+A1-2021 (BRE Guide 3rd Edition) non-annex results have also been included in an appendix for completeness).

Across the proposed development, **100%** of the tested rooms are achieving the daylight provision targets in accordance with the BRE Guide.

#### **Daylight to Existing Buildings**

When compared to the Existing Situation, of the 146 no. points tested, **100%** have a Proposed VSC value greater than 27% or not less than 0.8 times their former value compared to the Existing Situation, thus complying with the BRE Guidelines.

#### **Sunlight to Proposed Development**

Of the 100 no. points tested, 90 no. points (**90%**) meet the BRE Guide 3rd Edition/IS/BS EN 17037-2018+A1-2021 sunlight exposure recommendations of greater than 1.5 hours on March 21st. When including bedrooms as habitable spaces this increases to 94 no. points (**94%**). Where windows do not meet this recommendation, this is predominantly as a result of their orientation. Overall, the sunlight provision results to the proposed development in accordance with IS/BS EN 17037:23018 are performing to a very high standard due to the fact that not all spaces face south.

#### **Sunlight to Existing Buildings**

When compared to the Existing Scheme, **91%** of the tested points (10 out of 11 no.) meet the BRE recommended values. These results highlight that the proposed development will have negligible impact to the sunlight received to these existing neighbouring properties. The point tested that falls below the winter recommendations is one window at No. 78A Beaumont Grove to the east of the development. The same window achieves the Annual Probable Sunlight Hours (APSH) results for living room windows. This winter result can be noted as a minor adverse impact to this property. Furthermore, although not included in this assessment it should also be taken into consideration that there are existing trees that will have some impact on the sunlight during the winter months even in the existing case.

#### **Shadow Impact on Existing Amenity Spaces**

On March 21st the vast majority of existing amenity spaces (**97.5%**) will receive the same levels of sunlight with the proposed development in place when compared to the existing scenario. Of the 41

no. existing private gardens assessed only one amenity space (No. 78 Beaumont Road) falls marginally outside the guidelines (73% rather than 80%) and therefore it can be concluded that there will be a minor adverse impact to this garden. Although not included in this assessment it should also be taken into consideration that there are existing trees along Beaumont Grove that will already be impacting on the sunlight to this garden space.

### Overlooking

The proposed development has been designed to safeguard residential amenity and to prevent undue overlooking of adjoining properties and internal communal areas. The layout adopts a courtyard-type arrangement with the blocks orientated primarily inward toward the central shared space, while maintaining appropriate setbacks and landscaped buffers along the site boundaries to soften the interface with neighbouring dwellings. Window and balcony placement has been carefully considered to ensure that primary outlook is directed toward the internal courtyard, landscaped areas and public streets, thereby reducing the potential for direct views into the private gardens and rear elevations of surrounding residential properties.

Within the scheme, the relationship between apartments and shared amenity spaces is intended to provide passive surveillance and a safe environment without compromising privacy. The arrangement of balconies and habitable room windows ensures that communal areas are overlooked in a managed manner, with clear differentiation between communal and private spaces.

### Open Space

Policy and Objective 5.1 of the S28 Sustainable and Compact Settlements Guidelines for Planning Authorities (2024) state that the requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.

The policy further states:

*“In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.”*

Sections 15.8.6 of the DCC Development Plan state that normally a provision of 10% of the site area is required as public open space within new residential developments. However, Section 15.8.7 clarifies that:

*“Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This*

*would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park.*

*In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective.*

*Financial contributions in lieu of public open space will only be applicable in schemes of 9 or more units. The details on the value of the contribution in lieu and other exemptions are set out in the Dublin City Section 48 Development Contribution Scheme and any future amendments thereof."*

The LRD Opinion from DCC states the following in relation to Public Open Space:

*"The site area is serviced by Ellenfield Park and no public open space is required within the site. A financial contribution in lieu of public open space is therefore required."*



Figure 10 Ellenfield Park

As a result the open spaces within the proposed development are designed and intended as communal open spaces. The proposed development will provide c.1,266 sq.m net in total of communal open space comprising a main, central space, along with an additional area east of the apartment block and a small area to the west adjoining the two duplex blocks.

This provision equates to 20.5% of the site area and is significantly greater than the minimum communal open space provision required under the Apartment Guidelines. In addition c.616 sq.m of ancillary landscape space will be provided.

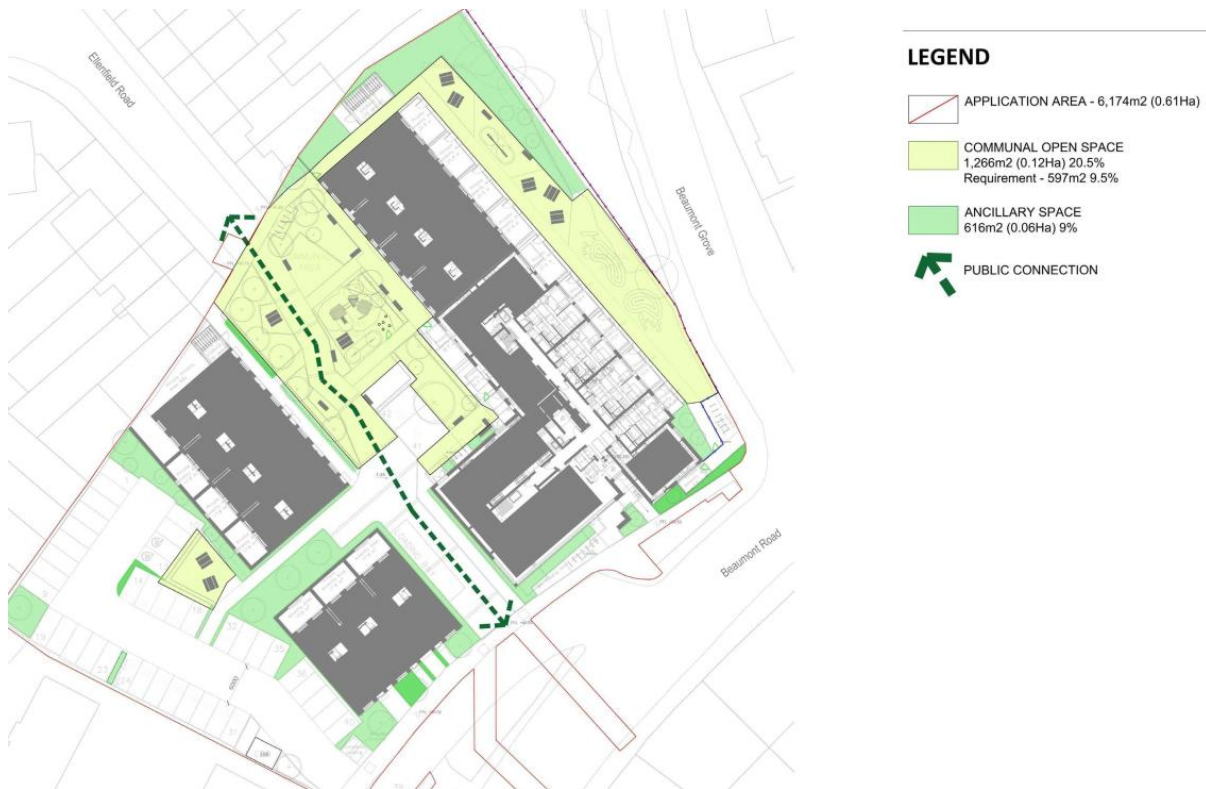


Figure 11 Communal Open Spaces (Parkhood)

## Car Parking

The overall development includes a total of 42 No. car parking spaces which includes 1 No. car sharing parking space, 1 No. accessible car parking space. This provision equates to 0.4 spaces per residential unit.

Dublin City Development Plan 2022-2028 divides Dublin City into three zones for the purpose of parking control, as illustrated on Map J of the development plan. In addition, Table 2: Maximum Car Parking Standards for Various Land Uses within the Appendix 5 of the Dublin City Development Plan 2022-2028, sets out the required level of on-site parking to be provided.

The Subject Development is in Zone 2 therefore; the maximum number of car parking spaces is 1 per each dwelling.

Dublin City Development Plan 2022-2028 stipulates that a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location. It is considered that the subject site is aligned with the criteria:

- Location suitability and site advantages: The site is located in a strategic location with several schools, health centres, retail areas and business parks within walking distance (see Figure 3 and Figure 5 above).
- Proximity to High Frequency Public Transport services (10 minutes' walk): The site is well served by public transport, and future improvements will enhance this further, providing an excellent public transportation service.

The nearest bus stops to the site are located on Beaumont Road. The closest stop is immediately adjacent to the subject development, with additional stops approximately 150 m (2-minute walk) from

the site. These stops are served by bus routes 14 and 16. These services run at a frequency of 10 – 15 minutes.

There are also several bus routes which serve the site in the road network surrounding. Along Collins Avenue approximately 500m (7-minute walk), the subject development is served by bus route N4 which has a frequency of 10 minutes.

The subject site is located approximately 650m (8-minute walk), from the N1/Swords Road, which is a Quality Bus Corridor (QBC), that is served by additional bus routes such as 900, 901, 901M, 980B, 1, 904, 910, 41D, 847, 41, 41B, 41C, 101, 16D, 33, 33E and 33n.

Additionally, according to the Public Transport Accessibility Level (PTAL) analysis, the subject development is located in an area that has medium to high level of service.

- Walking and cycling accessibility/permeability and any improvement to same: The internal layout is designed to provide pedestrian pathways to link internal units to the surrounding pedestrian network. The permeability of the site is ensured by providing access to/from the surrounding road network (see Section 5.2.2).
- The range of services and sources of employment available within walking distance of the development: The overall development is surrounded by several services and employment areas as indicated in Figure 3 and Figure 5 above.

A 24-minute walk provides access to a range of amenities, including healthcare facilities such as Beaumont Hospital; educational facilities such as St. David's Boys National School and St. David's College, Artane; grocery stores including Centra, Tesco and Lidl; and retail destinations such as Omni Shopping Centre and Artane Castle Shopping Centre.

The subject development is well connected to surrounding areas via cycling infrastructure. A 24-minute walk provides access to a range of amenities, including healthcare facilities such as Beaumont Hospital; educational facilities such as St. David's Boys National School and St. David's College, Artane; grocery stores including Centra, Tesco and Lidl; retail destinations such as Omni Shopping Centre and Artane Castle Shopping Centre; public transport links including Killester, Connolly and Clontarf DART stations; and employment hubs such as Eastpoint Business Park, Jamestown Business Park and Port Tunnel Business Park.

- Availability of shared mobility: The site is located in close proximity to various alternative Go-Car facilities which are less than 10-minute walking catchment from the subject site. The subject site will benefit from the Go-Car scheme with an allocated Go-Car parking space immediately adjacent to the subject development's access.
- Impact on the amenities of surrounding properties or areas including overspill parking: in terms of mobility, the primary objective of the developments is to discourage the use of private vehicles and encourage residents to choose more sustainable means of transport. The extensive public transport service in the area and the provision of carsharing within the development help to ensure that residents do not feel the need to own a car in order to reach their destination. In addition, to mitigate any potential negative effects, the following measures have been proposed:
  - Resident Parking Permits: Introduction of a resident parking permit scheme to prioritize local residents.

- Enhanced Public Transport: Encouragement of public transport use through improved accessibility and frequency of services.
- Cycle Facilities: Provision of ample bicycle parking to promote cycling as an alternative mode of transport.

These measures aim to ensure that the development does not adversely affect the amenities of the surrounding properties and maintains the quality of life for local residents. Further information about this is provided in the Waterman Moylan Mobility Management Plan.

- Impact on traffic safety including obstruction of other road users: the overall development has been analysed to determine its potential impact on traffic safety, with a focus on preventing obstructions to other road users. Key strategies to enhance traffic safety and minimize obstructions include:
  - Clear Signage: Installation of clear and visible signage to guide drivers and pedestrians, reducing the risk of accidents.
  - Provision of sufficient sightlines: Sufficient sightlines have been provided at the entrance of subject development (see Waterman Moylan Drawing No. 20-048-P2016 – Proposed Entrance Sightlines).
- Robustness of Mobility Management Plan to support the development: The planning application documentation includes this Mobility Management Plan which provides for several measures to be adopted to encourage the use of sustainable means of transport by residents of the subject development.

The 0.4 car parking ratio proposed is considered adequate, as the subject development is located within an area with a medium to high level of public transport service, as outlined above. It is also noted that a recently permitted development (Reg. Ref. LRD6076/25-S3), the Hines Scheme at Hoy Cross College on Conliffe Road, located within a 2 km radius of the subject site, provides a parking ratio of 0.31 spaces per unit. Accordingly, for the recently permitted development comprising 1,131 apartment units, a total of 345 car parking spaces is proposed, reflecting the site's high public transport accessibility. Given that the subject development benefits from a comparable level of public transport provision, a parking ratio of 0.32 spaces per unit is considered sufficient to meet the anticipated demand of future residents.

### Permeability

This site is highly accessible, which, as set out in the transport section above, can accommodate a reduced level of car parking in favour of increased levels of cycle parking and pedestrian mobility. The proposal includes a pedestrian route through the site which will lead to Ellenfield Park and public transport options in the area.

### Engineering Services

#### Water Supply & Foul Drainage

There is an existing 300mm diameter concrete foul sewer line traversing the site from the northwestern boundary to the southeastern corner of the subject site. The foul network ultimately outfalls to the Beaumont Waste Water Pump Station which is located across the road from the subject site, whereafter it is pumped in the 300mm diameter rising main, that is located along the eastern boundary of the subject site, northwards. The existing rising main has an average depth of c. 1.47m. It is proposed that this pipe is to be diverted to a more suitable location, adjacent to the Beaumont

Road. The diversion will ultimately tie into the existing sewer manhole located in the southeastern corner of the site.

It is proposed to connect the subject site to the existing 150mm uPVC watermain on Beaumont Road to the south of the site. A pre-connection enquiry, Uisce Éireann Reg. Ref. CDS25009341, was submitted to Uisce Éireann on the December 2025 for the 110 units. A response from Uisce Éireann was received confirming that the connection is feasible without upgrades.

#### Surface Water

There is an existing 225mm diameter surface water vitrified clay pipe traversing the subject site from the northwestern boundary to the southeastern boundary. Diversion of the existing surface water that is currently travelling through the site is required. All onsite surface water will be flowing into the diverted line at a restricted rate and ultimately connected to the existing 250mm diameter surface water line to the south of the site.

The attenuation storage required for the subject site is sized to accommodate the Qbar runoff rate of 3.16 l/s and a contributing hard standing area of 0.381ha. The runoff will be restricted via the Hydro-Brake (or similar approved) manhole, with excess runoff stored in an underground stone filled attenuation. The above mentioned input data were utilised in the CAUSEWAY – FLOW modelling software to determine the storage required.

A green/blue roof structure is proposed for the building offering surface water storage up to and including the 1-in-100 year rainfall event. The green/blue roof will connect separately into the proposed surface water network of the subject site. Surface water flow from the green/blue roof will be restricted to 1.0 l/s. The flow restriction will be achieved by means of an overflow control device fitted to the roof system.

The proposed surface water drainage system for this development will be designed as a sustainable urban drainage system and will use underground attenuation together with a flow control device, permeable paving, green-blue/roof and a petrol interceptor.

#### Part V

Please see the submitted Part V pack. The proposal is designed in accordance with the Part V requirements of the Planning Act and with a 20% allocation (20 no. units) of the total number of units provided. These units are located on first and second floor. A Part V validation letter has been submitted with this application from DCC's Housing and Community Services Department.

#### Materials and Finishes

Henry J Lyons set out in their Architectural Design Rationale the development provides the specific detailing of materials, elevations and external finishes to the buildings. The finishes have been chosen to ensure that they are high quality, durable and sustainable finishes providing a high-quality development. Please refer to the individual block elevations and overall site context elevation and section drawings prepared by Henry J Lyons, and the 3-D Visualisations prepared by Modelworks accompanying the submission illustrating the design of the scheme and demonstrating how the development will sit in the site and the surrounding context.

## 5. Statement of Response to LRD Opinion

An LRD Meeting, planning authority reference LRD9004/26-S2 was held on the 18<sup>th</sup> of March 2026 via Microsoft Teams. Following this LRD Meeting under section 32 of the Act, the council were required to provide an Opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

The Planning Authority issued its Opinion on the 15<sup>th</sup> of April 2026. This confirmed that the *“Planning Authority is of the opinion that the documentation submitted constitute a reasonable basis on which to make an application for permission for the proposed LRD.”*

The Opinion also stated that: *“Furthermore pursuant to article 16A of the Planning and Development (Large-Scale Residential Development) Regulations 2021 the applicant is hereby notified that, in addition to the requirements of section 32D, notify the prospective LRD applicant that specified information in addition to the requirements of article 23, the following specific information should be submitted with any LRD application for permission for the proposed development:*

| LRD Opinion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1.Planning</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>1.1 Density / Accessible Location</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <i>Having regard to the <u>cumulative</u> provision of existing and planned public transportation (urban bus service) within 500 metres, the centre of the application site is categorised by the planning authority as an 'Accessible Location'. Having regard to this the applicant shall demonstrate compliance / alignment with Sustainable Residential Density and Compact Settlement Guidelines (2024), particularly in terms of density and car parking ratio proposed (see also Transportation Planning matters below).</i> | <p>This is noted. Compliance with the Compact Settlement Guidelines in relation to density and car parking provision is outlined in detail in the planning policy review in Section 6 below.</p> <p>We contend that the proposed density of the development is acceptable for this location and is fully justified having regard to the objectives, intent and proper interpretation of the 2024 Guidelines.</p>                                                                                                                                                                    |
| <b>1.2 Communal Amenity Space</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <i>The extent of the communal amenity space to the east of the site is unclear. The boundaries of same are unclear. The usability of same is equally unclear, particularly the communal amenity space in the south-eastern portion of the site.</i>                                                                                                                                                                                                                                                                                 | <p>Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1004 Open Space Provision Plan prepared as part of the significant revision to the open space/car parking layout in the proposed development, following comments received at the LRD Opinion meeting. The drawing and information has been updated to clarify the extent, layout, and distribution of communal amenity space including the eastern portion of the site. The drawing sets out the associated ancillary spaces and provides a comprehensive schedule of areas. The boundaries of all communal open spaces</p> |

*The quantum of communal open space has been crudely calculated in the documentation stated to equate to 1,800 sq.m. It is not clear how this figure has been arrived at. In order to provide clarity, the landscape plans require additional detail clearly indicating all key dimensions of the communal amenity spaces and buffer / privacy strips adjacent to the ground floor units; nature of uses, including equipment / seating etc., indicated on the landscape plans. The true quantum of useable and accessible communal amenity space is required to be provided.*

*The communal open space to east does not relate well to the proposed 6-storey apartment block as ease of access has not been provided. The pedestrian route to access the amenity space from the apartments is convoluted and far from ideal. Furthermore, the residents of the block do not have any views of the amenity space, thereby no supervision from the residents of the block of the external amenity spaces below. Children living in the apartment block would not benefit from the required level of passive supervision from any of the block's units. The future occupants of the apartments, i.e. those living in the higher density part of the scheme, should have the optimum access to, and overlooking of / sense of connection to, their associated communal amenity space in the scheme. The submitted Planning Report and Design Statement also require updating detailing how this has been achieved.*

are clearly defined in terms of extent, access, and ownership. The design / layout / presentation on this plan of the communal area to the south-east has been improved to demonstrate how it is anticipated to function as an attractive, safe, and usable amenity space for residents.

Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1004 Open Space Provision Plan. This drawing has been updated to provide additional clarity on the extent, quantum and usability of communal open space (as well as extent of ancillary landscape areas or open spaces).

- Communal Open space – 1,266m<sup>2</sup> (0.12Ha) 20.5%
- Ancillary Space – 616m<sup>2</sup> (0.06Ha) 9%

Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals. The communal open space arrangement within the proposed development has been significantly revised to address this point and improve connectivity between residents and amenity spaces. The main change is the provision of a central landscaped courtyard in the centre of the site in an area that was previously dominated by car parking and access provision. A smaller area of open space including a play area is located to the west. This and the reworked communal open space to the east ensure a balanced and improved provision of amenity spaces across the site. Residents in Block A have direct access to the communal open space to their immediate west (equating to 745m<sup>2</sup>) while a short walk through intervening open space would take them to the communal open space towards Beaumont Grove (equating to 425m<sup>2</sup>). The positioning and orientation of the open space in relation to the apartments enable natural surveillance of the

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| <p><i>It is unlikely that residents from the units on the eastern side of the scheme will utilise the favourable communal space on the western side of the scheme due to unlikely sense of attachment to it coupled with road safety issues i.e. residents, including young children, having to traverse the roadway and car parking running from one end of the site to the other. In this regard the applicant is advised not to rely on the communal amenity space on the western side of the scheme to serve the residents residing in the apartment block on eastern side of the scheme.</i></p>                                                                      | <p>communal spaces from multiple units, as well as from active ground floor frontages. This ensures an enhanced level of passive supervision, contributing to safety and usability, particularly for families and children and the amendments offer improvement and clarity to the amenity area's connectivity, usability, and surveillance.</p> <p>Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals. The amended layout reworked the open space across the application site and this serves to address this point in terms of resident connectivity and accessibility to amenity areas. The repositioning of the core open space to the central courtyard (and moving car parking from this area) ensures open space is located in a more favourable location and increases sense of ownership and place. Residents can access this open space without having to traverse vehicular routes or car parking areas and it provides an enhanced linkage to the further open space towards Beaumont Grove. The former communal open space to the west has been reduced in size but still provides a small play area.</p> |
| <p><b>1.3 Daylight, Sunlight and Overshadowing</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><i>It is noted that the 'Daylight, Sunlight and Overshadowing Study' prepared by IES and submitted with the Opinion documentation does not assess sun lighting of the communal amenity space to the east of the site serving the apartment block and the adjacent proposed residential units. All of the amenity spaces require assessment, and the study requires to be updated to include same.</i></p> <p><i>Daylighting: The documents show a very high compliance rate with standards for the proposed residential units. For those units not reaching minimum standards, the units should be clearly identified and robust compensatory measures set out.</i></p> | <p>We refer to the updated Daylight, Sunlight and Overshadowing Study prepared by IES which includes an assessment of Sunlight to all proposed amenity spaces including the eastern communal open space. The assessment demonstrates that on March 21st, 88% of the combined proposed communal amenity areas situated within the development site will receive at least 2 hours of sunlight over their total area, thus exceeding recommendations in the BRE Guide (3rd Edition).</p> <p>The final design as submitted for planning was retested by IES and across the development, 100% of the tested rooms are achieving the daylight provision targets in accordance with Table NA.1 of BS EN 17037-2018+A1-2021 National Annex using Method 2.</p>                                                                                                                                                                                                                                                                                                                                                                                            |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Overall the quality of daylight provision across the development is high.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>1.4 Housing Quality Assessment (HQA)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><i>Compliance of the apartments and duplex units have been taken as given and no in-depth discussion of same took place. The applicant was advised at the meeting to ensure the residential units complied with, or exceeded, all relevant standards, including compliance with, or exceeding the following as set out in Development Plan (where relevant) and the Section 28 Guidelines to include: the 'minimum floor area' standards (SPPR 2); 'room sizes'; 'floor to ceiling' heights (SPPR 4) 'Private Amenity Space'; 'Dual Aspect Ratio (SPPR 3)'; 'Internal Storage'; 'Security Considerations; Communal Facilities (Section 4).</i></p> <p><i>The applicant is requested to highlight (by clear colour coding or other) those units that have been designed to comply with UD standards i.e. Objective SNO11 of the Dublin City Development Plan 2022 - 2028 and the HQA should include a column which shows which apartments are designed as Universal Design (UD) units.</i></p> | <p>Noted. All units either comply with or excess the minimum standards and are individually detailed in the Housing Quality Audit (HQA).</p> <p>The 12 UD units are as follows:</p> <ul style="list-style-type: none"> <li>• A-00-08 (1 bed apartment)</li> <li>• TA-00-01 (2 bed duplex apartment)</li> <li>• TA-00-02 (2 bed duplex apartment)</li> <li>• TA-00-03 (2 bed duplex apartment)</li> <li>• TA-00-04 (2 bed duplex apartment)</li> <li>• TA-00-05 (2 bed duplex apartment)</li> <li>• TA-00-06 (2 bed duplex apartment)</li> <li>• TA-00-07 (2 bed duplex apartment)</li> <li>• TA-00-08 (2 bed duplex apartment)</li> <li>• TA-00-09 (2 bed duplex apartment)</li> <li>• TA-00-10 (2 bed duplex apartment)</li> <li>• TA-00-11 (2 bed duplex apartment)</li> </ul> <p>These are identified in the Schedule of Accommodation and also details in Section 7 of the HQA and Section 3 of the Design Statement.</p> |
| <b>1.5 Street Activation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><i>Block A has been designed with a blank façade at ground floor level at the prominent entry point to the scheme. The ground floors uses here do not activate the street / provide passive overlooking at the entrance to the scheme. The ground floor façade at the south-west point of Block A is blank. This is main entrance and exit point into the scheme. To improve</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>The ground floor of the apartment block has been revised with the amenity enlarged and now additional fenestration and animation onto the western elevation, as can be seen in the CGI extract below and on HJL Drawing 2002 (Courtyard Elevation).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

*security, residential amenity and visual amenity the applicant is requested to provide the active uses at this key entry point i.e. 'Amenity Space'; 'Caretakers' / Building Maintenance Office at this key entry point and the 'back of house' uses i.e. plant room; waste storage ESB substation' in less prominent locations.*



Please also refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals. The ground floor layout has been revised to introduce an area of open space incorporating seating and planted areas at the main entrance to Block A. This intervention provides activity and passive surveillance aside this arrival point.

Further landscape works are incorporated along the south-west façade to soften its appearance and enhance visual amenity. These changes will improve the landscape character at the main entrance / exit point to address this point.

## 1.6 Block Description / Drawings Consistency

*The description of development refers to 4 no. blocks, yet drawings only label 2 blocks – A & B. The drawings and description of development should align to allow for ease of reference and understanding of the proposal.*

The labelling has been revised. The 22 units within the 3 no. duplex blocks comprise 11 no. 2-bed units at ground floor and 11 no. 3 bed units at upper floor and which are listed separately as “townhouse” on the HQA. The unit types on each floor of the 6 storey apartment block are clearly marked on the drawings and HQA.

*The applicant is required to submit all relevant supporting documents in accordance with Section 15.1 of the Dublin City Development Plan 2022 – 2028.*

All relevant documents as per Section 15.1 of the Dublin City Development Plan 2022–2028 have been submitted. Note that Community Safety Strategy is included within the Design Statement from HJL.

## 2. Transportation

### 2.1 Application Red Line Boundary and Work to the Public Road

*a) A Letter of Consent to extend the redline boundary into the public road will be required. The applicant is requested to*

Noted. A DCC letter of consent dated 25/8/26 is included with the LRD application and follows consultation with DCC Transportation.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <p><i>liaise with and seek agreement on proposed changes from the Transportation Planning Division prior to submission of the application with regard to the Letter of Consent and show the intention of a pedestrian crossing along the slip road off Beaumont Road as per the recommendation of the RSA.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>2.2 Site Access &amp; Internal Permeability</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><i>a) The applicant should submit updated site plans and landscaping drawings demonstrating that all internal footways are designed with a minimum width of 1.8m, in compliance with the requirements of DMURS.</i></p> <p><i>b) A verge of 0.3m should be provided in areas of perpendicular parking where vehicles may overhang the footway in compliance with the requirements of DMURS.</i></p> <p><i>c) The applicant should provide a dedicated setdown area within the site for servicing and deliveries. The dimensions of this shall comply with DMURS or otherwise as required with the Servicing and Delivery Management Plan.</i></p> <p><i>d) The applicant should provide additional landscaping to break up the Shared Functional Area to ensure it is not car dominant and is an inviting space for pedestrian/cyclist permeability.</i></p> <p><i>e) The applicant shall provide a Walking and Cycling Audit, in compliance with Objective SMT010 of the DCDP 2022-2028.</i></p> | <p>a) Please refer to Waterman Moylan drawing No. 20-048-P2030– DMURS layout for the complete layout assessment in relation to DMURS requirements, including the width of footways and roads through the development. We can confirm all footways are a minimum of 1.8m wide as required, in compliance with DMURS requirements.</p> <p>b) All parking spaces on the development have been revised and are a minimum of 5.10m long, which will ensure no vehicle overhang will be over footpaths. The longer parking bay is in accordance with DMURS requirements. (Additionally, where parking spaces are located in close proximity to a building, a wheel stopper will be provided to guarantee the walls are not damaged.)</p> <p>c) A dedicated loading bay has been provided within the development for servicing and deliveries. The dimension of it is compliant with DMURS standards. Please refer to Waterman Moylan’s drawing No. 20-048-P2020– Parking layout for more details on the proposed location of the loading bay/set down area.</p> <p>d) The layout has been revised to ensure that the development is not car dominant. The main central area of the development is now proposed to be a shared area for pedestrians and cyclists, with no proposed internal road connecting Beaumont Road to Ellenfield Road. Permeability at this location is now designed to cater for pedestrian and cyclist only, with the exception of the fire tender emergency route. The car residents car parking to the south of the development has landscaping breaks between the spaces to also guarantee a more inviting area.</p> <p>e) A Quality Audit including a Road Safety, a walking and a cycling audit has been carried by Bruton Engineering and can be found together with this application under separate cover.</p> |

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| <b>2.3 Car Parking</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><i>a) The applicant is requested to increase the car parking ratio to a minimum of 0.5 from the proposed 0.3. The site is located within Zone 2 of Map J, is not located within 1,000 metres walking distance of an existing or planned high-capacity urban public transport node or interchange, or within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop, and as such this division has concerns in relation to the overall car parking quantum.</i></p> <p><i>b) The applicant must demonstrate through a revised Swept Path Analysis Drawing that access/egress to car parking spaces No. 1 and No. 23 is safe and would not result in vehicles mounting internal pedestrian areas as per space No.1 or clipping the proposed pedestrian crossing across the priority-controlled stop junction in the case of space No.23.</i></p> <p><i>c) A Car Parking Management Plan shall be submitted to include the following:</i></p> <p><i>i. Details of a pro-active management of residential visitors to the site, in particular by private car and also day-to-day services.</i></p> <p><i>ii. The applicant must demonstrate that all car parking bays have a minimum width of 2.4 meters and a minimum length of 4.8m in compliance with DMURS.</i></p> <p><i>iii. Provision of a minimum of 50% car parking spaces with EV infrastructure with the remaining parking spaces to be ducted. The EV Charging must not impact the proposed internal footways.</i></p> <p><i>iv. Provision of motorbike parking at a quantum of 5% of car parking.</i></p> | <p>a) The proposed 100 unit development provides 42 no. carparking spaces. This includes 2 accessibility spaces and 1 no. car sharing space. Each GoCar vehicle is estimated to replace approximately 10–20 privately owned cars on the road. Excluding the accessible spaces then the residential parking ratio of the revised development is at least 0.5.</p> <p>Please refer to Waterman Moylan Drawing Number 20-048- P2020- Parking Layout for more details of car parking on the site.</p> <p>b) The layout and parking spaces for the overall site have been revised. A Swept Path Analysis has been carried out, demonstrating that access/egress to all car parking spaces is possible and ensuring there is no mounting of the internal pedestrian areas, or clipping of the proposed pedestrian crossing at the priority-controlled stop junction. Please refer to Waterman Moylan's drawing No. 20-048-P2050 –Swept Path Analysis- Standard Vehicle for more details.</p> <p>c) Please refer to Waterman Moylan Report No. 20-048r.019 Parking Management Plan, which is included within this submission under separate cover, and it includes details of the following:</p> <p>i) Visitors to the site and day-to-day services will be managed by restricting access to the residents-only car parking spaces as well as providing a loading bay for day-to-day services as set out in Waterman Moylan Report 20-048r.019- Parking Management Plan and Waterman Moylan Drawing No. 20-048-P2020 – Parking Layout.</p> <p>ii) Please refer to Waterman Moylan Drawing No. 20-048-P2030 – DMURS Drawing which demonstrates that all car parking bays have a minimum width of 2.4 meters and a minimum length of 5.1m in compliance with DMURS.</p> <p>iii) 22 No. EV car parking spaces (50%) will be provided within the site, with ducting for future EV infrastructure installed at the remaining residential car parking spaces. EV charging points have been designed so as not to impact proposed internal pedestrian footpaths. Please refer to Waterman Moylan Drawing</p> |

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| <p>v. <i>Provision of accessible car parking at a quantum of at least 5% of the total number of spaces shall be accessible car parking spaces, with a minimum provision of at least one such space.</i></p> <p>vi. <i>The applicant is requested to support reduced car parking on site by increasing the provision of car share to a minimum of 2 - 5no. car spaces. A Letter of Intent from a car share provider for the car-share spaces shall support the application. An updated site layout plan shall be submitted illustrating the increase in spaces.</i></p> | <p>Number 20-048-P2020-Parking Layout for more details on EV Parking Infrastructure.</p> <p>iv) The parking layout has been revised to ensure there are motorbike spaces equivalent to a minimum of 5% of the total car parking spaces, with 2 no. motorbike spaces within the development, as demonstrated in Waterman Moylan Drawing 20-048-P2020-Parking Layout</p> <p>v) 2 No. accessible car parking spaces will be provided within the site, meeting the requirement for at least 5% accessible spaces. Please refer to Waterman Moylan Drawing Number 20-048-P2020-Parking Layout for more details of accessible car parking on the site.</p> <p>vi) We can confirm that car share parking is proposed to support reduced car parking on site. A Car Share company letter of intent is included with the application. Please refer to Waterman Moylan Drawing Number 20-048-P2030-DMURS Drawing for more details of Car Share parking spaces on the site.</p> |
| <p><b>2.4 Servicing and Delivery Management Plan</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>a) <i>The applicant is requested to submit a Servicing and Delivery Strategy which outlines deliveries, loading areas and waste collection within the site and includes the appropriate auto tracking for each required vehicle type. Auto tracking should ensure that there is no overhang or impingement. Staging areas and pick up locations for refuse should be demarcated which does not negatively impact or rely on the pedestrian footpaths. The proposed service strategy should ensure all elements of servicing are contained within the site.</i></p>  | <p>The Servicing and Delivery strategy of the site is addressed in Waterman Moylan report No. 20-048r.023 - Delivery and Service Management Plan, submitted together with this application. In addition, auto tracks for refuse vehicles, fire tender, delivery rigid trucks and standard cars are included with this application pack. For the loading bays and refuse route, no overhanging or impingement is present. The refuse collection point is within the development and not on the public road, so it will not impact on pedestrian paths and circulation.</p>                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>2.5 Bicycle Parking Proposals</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>a) <i>The Applicant shall prepare a Bicycle Design Statement. The BDS should provide details, drawings and associated documentation to address all bicycle parking issues in terms of quantity and quality provision. The documentation shall provide detailed drawings of all the bicycle parking areas, with 1:100 drawings of each of the bicycle parking stores types, and site map to capture the provision of outdoor parking, ensuring adequate separation distances, in compliance with</i></p>                                                             | <p>The bicycle design statement is addressed together within Waterman Moylan's report No.20-048r.024 – Bicycle Design Statement, in addition, the provision of cycle parking spaces and management of the same are included in reports 20-048r.019 Parking Management Plan and 20-048r.022 Traffic and Transport Assessment submitted with this application. The Parking Management Plan clarifies the management of the proposed cycle parking spaces, addresses the proposed parking number in relation to Local Authority requirements, as per below:</p>                                                                                                                                                                                                                                                                                                                                                                                                         |

*the NTA's Cycle Design Manual, 2023. The provision of cargo bicycle spaces at a rate of 5% of the overall bicycle parking shall also be demonstrated (Section 6.3 (Universal Access) of the Cycle Design Manual).*

| Unit Type                       | No.        | Long-term Ratio | Short-term Ratio | Long-term Cycle Parking | Short-Term Cycle Parking |
|---------------------------------|------------|-----------------|------------------|-------------------------|--------------------------|
| Studio                          | 17         | 1 per unit      |                  | 17                      |                          |
| 1-Bed Apartments                | 45         | 1 per unit      |                  | 45                      |                          |
| 2-Bed Apartments                | 27         | 2 per unit      | 0.50             | 54                      | 50                       |
| 3-Bed Apartments                | 11         | 3 per unit      |                  | 33                      |                          |
| Additional Cycle parking Spaces |            |                 |                  | 1                       |                          |
| <b>Total</b>                    | <b>100</b> | <b>1.54</b>     | <b>0.50</b>      | <b>150</b>              | <b>50</b>                |

The location of the proposed cycle parking can be found in Waterman Moylan's drawing No. 20-048-P2020-Parking Layout. The detailed drawings showing all cycle areas and different stores can be found within the Architect's drawings pack (drawing numbers EPB-HJL-XX-00-DR-A-1010 and EPB-HJL-XX-00-DR-A-6601), submitted within this application.

## 2.6 Documentation

*a) The applicant should ensure that all submitted documentation has been updated in the Stage 3 application documentation.*

All submitted documentation has been updated in the Stage 3 application documentation.

*b) The applicant should provide a Traffic and Transport Assessment in accordance with Table 15.1 of the DCDP 2022-2028.*

A Traffic and Transport Assessment has been carried out and can be found within this application under separate cover, under Waterman Moylan Ref. No. 20-048r.022 – Traffic and Transport Assessment.

## 3. Parks, Biodiversity and Landscape Matters

### 3.1 Arboriculture

*The tree survey document shall include a summary schedule indicating the number of existing trees located on site, located immediately adjacent the site, the number of trees to be removed as a result of the development and the total number of trees to be planted under the landscape scheme.*

Please refer to the submitted Tree Survey Report and associated Tree Constraints Plan. This provides a comprehensive schedule outlining the number, condition, and locations of existing trees both within and immediately adjacent to the site. The documentation clearly identifies trees to be retained and those proposed for removal as part of the development.

*A quantity of Field Maples will be included as compensatory planting for those proposed to be felled.*

Compensatory planting is incorporated within the landscape proposals (Please refer to Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals), including a quantity of field maple trees to offset those removed as well as the broader planting works proposed as part of this development.

*A tree protection plan is required to be submitted indicating all development proposals (buildings/services etc.), all existing trees to be retained on site and adjacent to the site and position of tree protection measures, such as tree*

Please refer to Parkhood Drawing No. 8569-PHL-00-ZZ-DR-L-1002 Development Impact Plan. This plan clearly identifies the extent of proposed works relative to retained trees, along with appropriate tree protection measures, including root protection areas, protective fencing. An Engineer's services overlay has been

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| <i>protection fencing, trunk protection, no-dig zones.</i>                                                                                                                                                                                                                                                                                                            | provided in conjunction with the landscape proposals to demonstrate coordination with existing and proposed underground services.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>3.2 Public Open Space</b>                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <i>The site area is serviced by Ellenfield Park and no public open space is required within the site. A financial contribution in lieu of public open space is therefore required.</i>                                                                                                                                                                                | This is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>3.3 Landscape Masterplan</b>                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <i>Landscape Masterplan: The application boundary shall be included. Existing underground services shall be indicated.</i>                                                                                                                                                                                                                                            | The Application Site boundary is included on the Landscape Masterplan. Following a review of underground services locations, proposed tree planting has been amended to ensure it does not conflict with these locations. (Please refer to Drawing L1001)                                                                                                                                                                                                                                                                                                                              |
| <i>Daylight Sunlight Assessment: The plans and assessment of communal open space (COS) shall be coordinated with the updated landscape masterplan and show all COS.</i>                                                                                                                                                                                               | We refer to the updated Daylight, Sunlight and Overshadowing Study prepared by IES which includes an assessment of Sunlight to all proposed amenity spaces including the eastern communal open space. The assessment demonstrates that on March 21st, 88% of the combined proposed communal amenity areas situated within the development site will receive at least 2 hours of sunlight over their total area, thus exceeding recommendations in the BRE Guide (3rd Edition).                                                                                                         |
| <b>3.4 Communal and Private Open Space</b>                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <i>Communal Open Spaces: The access for apartment residents to proposed communal open space shall be amended to include direct access to the eastern COS provision from the apartment's core lifts zone. The route to the western COS shall include a pedestrian priority crossing at the access road. All COS spaces shall be enclosed for privacy and security.</i> | Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals. The revised layout now provides the main communal open space for the development at the centre of the site, providing more direct and convenient access for residents while improving the accessibility of the eastern communal amenity space. It is therefore not considered necessary to revise the internal layout of the apartment block to provide additional access to the secondary communal open space to the east of the site, when direct access to the main open space area is now provided. |

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| <p><i>The roof areas may include COS to bring the total readily accessible quantity to the apartment standard guidelines.</i></p> <p><i>Private Open Space: Private rear garden areas at western duplex units shall be extended to increase space for residents.</i></p> | <p>At the same time the eastern open space has also been redesigned to improve its quality and amenity. Please refer to Parkhood Drawing No. 8569-PHL-00-ZZ-DR-L-1003 Boundary Proposals Plan. The eastern communal area is secured with a 2m high decorative steel railing, complemented by hedge planting along the boundary with Beaumont Grove, ensuring both enclosure and visual amenity. The smaller play area to the west is also enclosed with a low 1.2m high bow-top railing, providing appropriate safety while maintaining visibility. All communal open spaces are designed with appropriate access, enclosure and natural surveillance measures to ensure privacy, safety, and usability.</p> <p>Given the extent, distribution, and usability of the communal open space provided at grade, it is now not considered necessary to include additional communal amenity at roof level.</p> <p>Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals and the Housing Quality Assessment prepared by HJL. Private rear gardens have been extended to increase space for residents.</p> |
| <p><b>3.5 Green Roofs</b></p>                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><i>Green roofs: A green roof plan shall be submitted. Planting shall include biodiverse plant species. Please review the DCC Green &amp; Blue Roof Guide.</i></p>                                                                                                     | <p>A comprehensive Green Roof Plan has been prepared in accordance with the DCC Green &amp; Blue Roof Guide and is included within the Landscape Design Statement (Page 9). The proposed system incorporates a biodiverse extensive green roof, designed to support ecological value, climate resilience, and sustainable water management.</p> <p>Planting has been specified to include a diverse sedum mix supplemented with pollinator-friendly herbaceous species, ensuring year-round habitat provision and alignment with the Guide's emphasis on biodiversity enhancement. Substrate depths, drainage layers, and build-ups have been selected to meet the performance criteria outlined by DCC, including stormwater attenuation, thermal benefits, and long-term maintenance requirements. Please refer to Engineers drawings/reports for further information.</p>                                                                                                                                                                                                                                               |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>This approach ensures the green roof delivers measurable ecological and environmental benefits while fully complying with the standards and best-practice principles set out in the DCC Green &amp; Blue Roof Guide.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>3.6 Materials</b>                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><i>Materials: Materials for surfaces at key areas, e.g. meeting areas/plazas, building entrances shall in general deploy natural stone. 50% of external seating shall include arm and back-rests. 50% of all external cycle parking stands shall have weather covers.</i></p>                                                                                                                                                                           | <p>Please refer to Parkhood Drawing 8569-PHL-00-ZZ-DR-L-1001 Landscape Proposals. Material consideration for natural stone paving has been included within the central communal open space/courtyard and the main building entrance at Block A.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>3.7 Biodiversity / Ecological Impact Assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><i>Potential impacts on bats, foraging, roosting or other activity would be advisable given the available habitat and no relevant scientific data to confirm bat presence or otherwise on site is presented. A bat survey with potential impacts and mitigation shall be submitted. Optimal seasons for bat surveys would be from May to September at dawn and dusk. An additional walkover habitat survey is also required for current season.</i></p> | <p>Please see Altemar's EclA and Bat Fauna Assessment submitted with the application. Bat surveys were carried out on 30th of June 2026 and 6th of July 2026 (using bat emergent and detector survey). At dusk, a bat detector survey was carried out onsite using an Echo Meter Touch 2 Pro division detector to determine bat activity.</p> <p>No buildings or structures of roosting potential are present within the development site. In relation to bat roosting potential, no trees were noted on site of medium or high bat roosting potential.</p> <p>No bats were observed emerging from any onsite trees during the surveys. No bats were noted foraging or commuting on, or proximate to, the site.</p> <p>The bat survey complies with bat survey guidance documentation including Marnell et al (2022) and Collins (2016). The survey concluded that the site is of low suitability for bats, with existing street lighting from the road contributing to a brightly lit environment.</p> |
| <b>3.8 AA Screening / NIS</b>                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><i>AA Screening: The 15km zone of influence to the site is outdated and not applied. The current recommendation by the OPR is the source-pathway-receptor impact on Natura 2000 Sites. The report notes that there is the possibility that current on site ground and surface water could impact Natura 2000 Sites, due to the potential link via the culverted stream.</i></p>                                                                         | <p>Please see Altemar's AA Screening Report provided with this submission.</p> <p>It concludes that: <i>"Having taken into consideration the foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution and</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <p>NIS: The comments provided with reference to Brent Geese do not appear to be based on scientific evidence. The applicant is required to review.</p> | <p><i>settlement effect within the existing public surface water drainage network via the indirect pathway during operation and construction, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites."</i></p> <p>The proposed development site is not within a European site. As outlined in Office of the Planning Regulator (2021) "The zone of influence of a proposed development is the geographical area over which it could affect the receiving environment in a way that could have significant effects on the Qualifying Interests of a European site. This should be established on a case-by-case basis using the Source- Pathway-Receptor framework and not by arbitrary distances (such as 15 km)."</p> <p>The nearest Natura 2000 site is the South Dublin Bay and River Tolka Estuary SPA, located 2.7km from the site. Three watercourses are nearby: the Santry River approximately 1.8km north of the site, the River Tolka approximately 2.1km south, and the culverted Wad River directly adjacent to the site boundary (Figure 9). As no construction-related activities will be restricted to the site boundary and in turn no discharge or pollutants will enter the Wad River, it is not considered as a hydrological pathway to downstream European Sites.</p> <p>The proposed development is located within an urban environment adjacent to an urban park. There is no direct hydrological pathway from the subject site to any proximate watercourse or designated conservation site. Foul wastewater from the proposed development site will be discharged to the existing public foul network. Wastewater will be conveyed through the existing public sewerage system and treated at Ringsend Wastewater Treatment Plant (WwTP). A Confirmation of Feasibility was received from Uisce Eireann, confirming the feasibility of the foul water proposals. Upon completion and post standard onsite attenuation, it is proposed to discharge surface water to the existing public surface water sewer on Beaumont Road. This network ultimately outfalls to the River Tolka approximately 2.1km south of the site. Out of an abundance of caution, it is therefore considered that there is an</p> |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | indirect hydrological pathway between the proposed development site and Natura 2000 sites at Dublin Bay via surface water drainage during construction and operation of the proposed development. Relevant sites at Dublin Bay include North Dublin Bay SAC (4.5km), South Dublin Bay SAC (5.6km), South Dublin Bay and River Tolka Estuary SPA (2.7km), North Bull Island SPA (4.6km), and North-West Irish Sea SPA (7.5km). However, given the minimum distance from the proposed development site to these sites (2.7km), the scale of the proposed development, the significant catchment area of this watercourse and the fact that surface water drainage will be directed to an existing public surface water network, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately settle within the surface water drainage network and River Tolka, prior to reaching the marine environment in Dublin Bay. |
| <b>3.9 Required Submission Documents</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>The following documents are required to be submitted:</p> <p>Landscape Masterplan<br/>Hardworks/softworks outline plans<br/>Landscape Design Statement<br/>Arboricultural survey report &amp; plan, tree impact plan and tree protection plan<br/>POS &amp; COS open spaces and play spaces<br/>Key Plan with area calculations<br/>Boundary Plan with details<br/>Landscape Sections and Elevations<br/>Birds Eye CGIs over open spaces<br/>Green Roof Plan with biodiverse planting<br/>AA Screening &amp; NIS<br/>Ecological Impact Assessment (including bat survey report &amp; updated habitat survey)<br/>Biodiversity Enhancement Plan (including details of 'bat friendly' lighting)<br/>Invasive Species report</p> | <p>Noted. All required documents have been submitted.</p> <p>Please refer to the submitted landscape package and accompanying reports. This includes a Landscape Masterplan, hard and soft landscape proposals, sections and a Landscape Design Statement outlining the overall approach. Arboricultural information has been provided, including survey details, a tree impact assessment, and tree protection measures.</p> <p>Communal open space provision is clearly calculated in the Landscape Design Statement and represented 20.5% of the net site area (1,266 sq.m).</p> <p>A full EcIA and AA Screening are included with the application with up to date surveys informing both. The EcIA notes that the on-site surveys noted no invasive species on the site.</p>                                                                                                                                                              |
| <b>4. Drainage Matters</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>4.1 Surface Water Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><i>The applicant is required to fully explore potential source control measures for surface water management. Small-scale measures such as rainwater planters to take roof runoff should be considered. Much greater integration is required</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>The overall site has been reassessed, and more SuDS features are now proposed within the site and the site has several multifunctional elements now. A complete Surface Water Management Plan has been prepared and can be found together with this</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

*between the landscaping and drainage proposals. There's an opportunity to incorporate SuDS measures such as rain gardens and SuDS tree pits into the various landscaped areas. Green/open spaces should be designed as a multifunctional spaces in accordance with the Dublin City Development Plan 2022-2028.*

*Appendix 13 of the Dublin City Development Plan 2022-2028 sets out all criteria that need to be addressed in the Surface Water Management Plan, including interception storage.*

*The proposed green roof must be a deeper intensive roof if the current proposal cannot meet the minimum green roof coverage percentages set out in the DCC Green Blue roof guide.*

*A more detailed sub-catchment layout should be provided, which indicates clearly how each area within the site is to be drained.*

submission under Waterman Moylan Report No. 20-048r.020 – Surface Water Management Plan. The plan shows in detail each type of SuDS elements proposed and can be read together with Waterman Moylan's drawing No. 20-048-2040 – Proposed SUDS Layout, which highlights the location of all SuDS elements and drawing No. 20-048-P200 - Proposed Drainage layout that show how the multiple elements interact between themselves. All elements added to the drainage system are designed in line with Dublin City Council Sustainable Drainage design & Evaluation Guide (2021), Dublin City Council Green & Blue Roof Guide (2021), Appendix 11 and 13 of Dublin City County Council Development Plan 2022-2028, CIRIA SUDS manual and the GSDS.

- Waterman Moylan Report 20-048r.020 – Surface Water Management Plan (submitted with this application) has been prepared in accordance with the Dublin City Council Development Plan 2022-2028 guidelines. The Report includes for details on the attenuation storage, SuDS Elements storage capacity and addresses the Interception volumes for the site in line with GSDS Criteria.
- The green roof is proposed to 50% of the total roof area, meeting the minimum green roof coverage set out in the DCC Green Blue Roof Guide for and intensive green roof which is the type proposed for the development. We would further note that all roofs will have allowance for a Blue Roof, including areas where green coverage is not proposed. Please refer to Waterman Moylan's drawing 20-048-2040 – Proposed SUDS Layout for the coverage of the green/blue roof.
- The development has been divided into 2 different catchments to allow for better management of the proposed attenuation volume within the site, and to allow connection with the existing line southeast of the proposed development. The figure below shows a high-level separation of each catchment, which will be better described below.



The site is roughly split in half, with the northern catchment covering most of the duplex units, apartment blocks and the main plaza area. The southern catchment includes mainly the residential parking lot and the remaining duplex units within the site.

The table below, taken from Waterman Moylan's report No. 20-048r.013 – Engineering Assessment Report, clearly states the details for the overall site, including catchments 01 and 02.

|                                | Overall | Catchment 1 | Catchment 2 |
|--------------------------------|---------|-------------|-------------|
| Subject Site Area – Ha         | 0.581   | 0.384       | 0.197       |
| Factored Impermeable Area – Ha | 0.386   | 0.250       | 0.136       |
| % Hardstanding                 | 66%     | 65%         | 69%         |
| SAAR - mm                      |         | 776         |             |
| SOIL Index                     |         | 0.47        |             |
| Climate Change                 |         | 20%         |             |

The greenfield runoff rate for this site has been calculated using the Institute of Hydrology report No 124 “Flood Estimation for Small Catchments” and the UK tools for design and evaluation of sustainable drainage systems - Appendix C. Each catchment will be restricted as follows:

|                        | Catchment 1 | Catchment 2 | Total |
|------------------------|-------------|-------------|-------|
| Site Area - Ha         | 0.384       | 0.197       | 0.581 |
| Hardstanding Area - Ha | 0.250       | 0.136       | 0.386 |
| Outflow - l/s          | 2.09        | 1.08*       | 3.16  |

\*We would note that the final outflow rate for this catchment will be set to 2.0l/s, to comply with the minimum allowable orifice size (50mm) of the hydrobrake. For each catchment the worst-case scenario was included into the modelling software, meaning that for the 1-30 and 1-30 year storm, not all SuDS elements were considered to attenuate and store rainwater (only

[illegible]

|                          | Area (m <sup>2</sup> ) | CV   | Area (m <sup>2</sup> ) |
|--------------------------|------------------------|------|------------------------|
| Roofs                    | 1481.81                | 1.00 | 1481.81                |
| Permeable Paving         | 688.79                 | 0.70 | 482.15                 |
| Roads and Concrete paths | 504.24                 | 0.95 | 479.02                 |
| Green area               | 1162.21                | 0.05 | 58.11                  |
| <b>TOTAL</b>             | <b>3,837.06</b>        |      | <b>2,501.11</b>        |

The water from the roof will be restricted at roof level to an allowable flow of 0.40 l/s (in reference to the Greenfield Run off) and will connect directly into the tank from an inspection chamber as shown in Waterman Moylan Drawing No. 20-048-P2200 – Proposed Drainage Layout. 50% of this roof will also be an intensive green roof to enhance the biodiversity elements of the site. A number of tree pits are proposed, which will intercept and direct excess water to the drainage network or directly to the rain gardens. The main attenuation and storage features for the catchment are the proposed underground stone attenuation tank, located under the main plaza central area. This tank

will be lined, and all outfall water will be restricted by means of a hydrobrake set to greenfield run off as set above.

We would further note that we did not propose any infiltration element for this site. All drainage features, including tanks and rain gardens, will be lined to ensure the water will drain into the proposed drainage lines. This is due to the fact that the site area has poor infiltration rates, as confirmed by the Site Investigation Percolation test carried out in April 2026, appended to this report for reference. Please Refer to Appendix C.

Catchment 02 is represented in more detail below:



For this catchment, the hardstanding area breakdown is as per the table below, taken from the Engineering Assessment Report:

|                          | Area (m <sup>2</sup> ) | CV   | Area (m <sup>2</sup> ) |
|--------------------------|------------------------|------|------------------------|
| Roofs                    | 513.49                 | 1    | 513.49                 |
| Permeable Paving         | 581.47                 | 0.7  | 407.03                 |
| Roads and Concrete Paths | 439.45                 | 0.95 | 417.47                 |
| Green area               | 439.30                 | 0.05 | 21.96                  |
| <b>TOTAL</b>             | <b>1,973.71</b>        |      | <b>1,359.96</b>        |

Catchment 02, different from catchment 01, is mainly comprised of the parking area for the residents and the remaining duplex roof areas. The parking area access road is proposed to be in asphalt, and the water from this surfacing will drain mainly to the permeable paving edges and to some road gullies. Every parking space is proposed to be a permeable paving, designed to intercept and store rainwater, which will then drain slowly to the proposed attenuation stone tank. Tree pits are also proposed for this catchment to help to

*If the stone attenuation areas are designed to infiltrate, then groundwater levels need be confirmed. There should be sufficient depth of unsaturated soil between bottom of infiltration devices and top groundwater level.*

enhance the biodiversity of SuDS elements and minimize from a car-dominant landscape. Rain gardens or biodiversity planted systems will be provided at ground level behind the duplex block, this will intercept rainwater draining from paths that connects the main plaza do the parking area.

The main attenuation and storage features for the catchment, similar to catchment 1, is the proposed underground stone attenuation tank, located under the play area and central parking spaces. This tank will be lined, and all outfall water will be restricted by means of a hydrobrake set to greenfield run off as set out on table 4 above.

We would further note that we did not propose any infiltration element for this site. All drainage features, including tanks, permeable paving, and rain gardens, will be lined to ensure the water will drain into the proposed drainage lines. This is due to the fact that the site area has poor infiltration rates, as confirmed by the Site Investigation Percolation test carried out in May 2026, appended to this report for reference. Please refer to Appendix C.

Both catchments will connect into the surface water diverted line, proposed to pass through the centre of the site in a north-south direction. For the complete drainage arrangement for the site please refer to Waterman Moylan's drawing 20-048-P2200 – Proposed Drainage Layout.

- The stone attenuation areas are not proposed to infiltrate into the ground. Both tanks proposed will be lined in order to retain attenuated water that will discharge in a controlled rate into the existing surface water network. A Site Investigation was carried out in the site in May 2026 to observe existing conditions, carry out infiltration tests for soakaways and report recommendations. The complete report of the SI can be found in the Appendix of this report. Please refer to Appendix C. The site investigation revealed that in all locations where infiltration tests

*The proposed tree planting over the line of the existing River Wad culvert requires further consideration. Access for sewer maintenance purposes should not require the removal of large, mature trees.*

*Public surface water infrastructure: The width of the wayleave over the existing River Wad culvert that runs through the eastern corner of the site needs to be confirmed.*

*It is a requirement for any diversion of existing public surface water sewer that the hydraulic capacity is not negatively impacted. 90 degree turns/bends in the diversion should be minimised.*

*Longitudinal sections through the proposed diversion should be provided.*

*Taking in charge: A taking in charge layout is required which shows clearly the areas*

were conducted, the water level dropped too slowly to allow any calculations for the soil infiltration rate. The surface water strategy was designed on the conclusion that the site has no permeability, and all water surface water will drain into the proposed network. Groundwater for the proposed site was encountered overall at c.1m below ground level. All SuDS measures and the attenuation tanks will be lined to avoid groundwater seeping into the surface water system.

- No new trees are proposed to be planted near the River Wad culvert and neither near the drainage line (proposed and diverted). The trees shown in the wayleave area of the culvert are existing trees to be retained. Access manholes for the existing sewer will be cleared of any restrictions necessary with agreement of the local authority.
- Please refer to Waterman Moylan's drawing No. 20-048-P2500 – Wad River Wayleave showing the wayleave for the culvert. We have allowed a 12m wayleave (6 metres from each side of the culvert wall) in line with recommendations from CIRIA, TII manuals and the GDSDS general guidance.
- 90 degree bends have been removed for the diverted surface water line at this site to ensure that hydraulic capacity is not impacted. Please refer to Waterman Moylan Drawing 20-048-P2200-Proposed Drainage Layout for the final proposed diverted route of the existing network. Additionally, Longitudinal sections through the proposed diversion have been prepared and can be found in Warterman Moylan Drawing 20-048-P2200-Surface Water Long Sections.
- Please refer to Warterman Moylan Drawing 20-048-P2200-Surface Water Long Sections for the whole site surface water network long sections, including the diverted line.
- Please refer to drawing EPB-HJL-XX-00-DR-A-0510 for the TIC areas of the proposed development provided by the Architects,

|                                                                                                                                                                                |                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <i>within the development to be taken in charge by Dublin City Council. If there are no areas intended to be taken in charge, confirmation of the same should be provided.</i> | together with this application under separate discipline submission                                                                    |
| <b>5. Archaeology Matters</b>                                                                                                                                                  |                                                                                                                                        |
| No further requirements at this stage. A condition requiring archaeological assessment will be recommended at planning application stage.                                      | Noted. Please see the updated Archaeology Impact Assessment conducted by Atcher Heritage Planning in accordance with this requirement. |

## 6. Statement of Consistency (Planning Policy Review)

This section provides an overview of national, regional and local planning policy which are relevant to this development.

### National and Regional Planning Policy

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- *National Planning Framework First Revision (2025) ("NPFFR");*
- *Climate Action Plan (2025) ("CAP 2025");*
- *Regional Spatial and Economic Strategy 2019- 2031 ("RSES");*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018) ("Building Height Guidelines 2018");*
- *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) ("Compact Settlement Guidelines 2024");*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022) ("Apartment Guidelines 2025");*
- *Design Manual for Urban Roads and Streets (2019) ("DMURS");*
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) ("Planning System and Flood Risk Guidelines 2009");*
- *Guidelines For Planning Authorities on Childcare Facilities (2001)*
- *Dublin City Development Plan 2022-2028 ("DCDP")*

### National Planning Framework First Revision, April 2025

The *National Planning Framework (NPF)* remains the Government's high-level strategy for shaping Ireland's future growth and development to 2040, now updated to reflect significant demographic, environmental, and policy changes since its original 2018 publication. It anticipates that Ireland's population will grow by approximately one million people, reaching 6.1 million by 2040. The Eastern and Midland Region is projected to grow to nearly 3 million people. The revised NPF continues to set out National Strategic Outcomes (NSOs) and National Policy Objectives (NPOs) that guide development at regional and local levels. The Government completed the review of the NPF in April 2025 and has now adopted a revised NPF. We note the revised NPF contains ambitions to deliver 50,000 units per annum. The Revised NPF puts an increased emphasis on transit orientated development while retaining the importance of compact development generally.

| National Policy Objective                                                                                                                                                                                  | Evaluation of Consistency                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <b>National Policy Objective 4</b><br><i>A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.</i>                              | The proposed development will provide new homes within the existing built-up footprint of the Dublin. |
| <b>National Policy Objective 7</b><br><i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.</i> |                                                                                                       |

|                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>National Policy Objective 12</b><br/><i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i></p>                                                                                                                 | <p>The proposed development will create a high-quality, attractive, and liveable place for residents. The proposal includes varied open spaces which will contribute to the high quality of life for residents.</p>                                                                                                                                                                                |
| <p><b>National Policy Objective 20</b><br/><i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i></p> | <p>The proposal is located within Dublin suburbs. The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk or cycle from the site.</p>                                                                                                                                                                              |
| <p><b>National Policy Objective 22</b><br/><i>In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.</i></p>                                                                 | <p>There is a strong emphasis towards increased building heights and reduced car parking standards in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height and car parking ratio is in line with government guidance and emerging trends for sustainable residential developments.</p> |
| <p><b>National Policy Objective 27</b><br/><i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</i></p>                                           | <p>Walking and cycling are prioritised throughout the scheme with controlled vehicular access into the scheme, provision of bicycle shelters and a high-quality public realm.</p>                                                                                                                                                                                                                  |
| <p><b>National Policy Objective 42</b><br/><i>To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040</i></p>                                                                                                                                                                                                    | <p>This proposal will provide 100 no. residential units in this sustainable location within Dublin City's metropolitan area.</p>                                                                                                                                                                                                                                                                   |
| <p><b>National Policy Objective 43</b><br/><i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i></p>                                                                                                                                                  | <p>The proposed scale of development is considered appropriate for this location.</p>                                                                                                                                                                                                                                                                                                              |
| <p><b>National Policy Objective 45</b><br/><i>Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights and more compact forms of development.</i></p>                                    | <p>The proposed apartment blocks will increase the residential density of this highly sustainable area.</p>                                                                                                                                                                                                                                                                                        |

### **Evaluation of Consistency**

The proposed development aligns with the objectives of the NPF First Revision by delivering compact growth within the existing settlement boundary, prioritising sustainable transport connections, and supporting a mix of housing types and community services.

The proposal provides increased residential density, high-quality design, and promotes active travel, consistent with National Policy Objectives promoting sustainable, integrated, and well-connected urban development.

The subject site is located within a suburban location north of Dublin City, which is identified for significant residential growth over the next two decades.

The proposed development seeks to deliver a significant quantum of residential development at a site that is located within a well-established area, and which is within walking distance of a multitude of services, exceptional public transport options and very good local amenities. The proposed development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced suburban area.

The subject site is served by a range of transport options. The Swords Road bus corridor is located 500m from the subject site and is served by a wide range of Dublin Bus routes (1, 16d, 33, 41, 41b, 41c, 41d). Additional bus routes 14 and 16 are located along Beaumont Road adjacent to the site. The Drumcondra corridor to the east of the site will become the A-spine for the planned BusConnects network as one of the future phases of delivery of the BusConnects programme. This bus corridor is adjacent to the subject site.

The site is within a well-established residential suburb location on the north side of Dublin which is within walking distance of a multitude of services, exceptional public transport options and local amenity and employment opportunities.

The site is located c.30 minute walk from Dublin City University and 5km from O'Connell Street. Overall, it is considered that the site is well located, and a highly accessible location well served by public transport, bike and walking facilities providing connection to the employment, commercial, health and education services within the vicinity and wider City.

The proposed development will provide for a high-quality residential scheme through the design and the materials and finishes proposed. In addition, the proposed units meet and exceed the minimum apartment size requirement as stated in the Apartment Guidelines, as demonstrated below in the Statement of Consistency with Relevant Section 28 Guidelines. The proposed development of apartments and duplexes in this location will provide greater variety in the type of house types in this location as well as providing an increased density, while enabling the delivery of the aims of the NPF to meet the demand for housing.

There is a strong emphasis towards increased building heights and densities in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height is in line with government guidance and emerging trends for sustainable residential developments.

Development of these lands is considered to be fully in accordance with the recommendations of the NPF.

## CLIMATE ACTION PLAN 2025

The Climate Action Plan 2025 (CAP 2025) is the fourth annual update to Ireland's Climate Action Plan 2019 and the third to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. It builds on the introduction of carbon budgets and sectoral emissions ceilings in Climate Action Plan 2023 and updated in CAP 24 and sets a course for Ireland's targets to halve emissions by 2030 and reach net-zero no later than 2050.

The publication notes for CAP 2025 set out that the new CAP should be read in conjunction with CAP 24 and therefore builds on the provisions of same, which the design team had regard to throughout the pre-application process and prior to CAP25 being published.

Under section 15 of the Climate Action and Low Carbon Development Act 2015, as amended by the 2021 Act, Planning Authorities and the Board are required in so far as practicable to perform their functions in a manner consistent with the most recent CAP.

The Climate Action Plan 2025 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

It will put Ireland on a more sustainable path; cut emissions; create a cleaner, greener economy and society; and protect us from the devastating consequences of climate change. It is a huge opportunity to create new jobs and grow businesses in areas like offshore wind; cutting-edge agriculture; and retrofitting, making our homes warmer and safer.

The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually to ensure alignment with our legally binding economy-wide carbon budgets and sectoral ceilings.

### **Evaluation of Consistency**

The proposed development is consistent with the Climate Action Plan 2025, supporting the transition to a low-carbon, climate-resilient society. The scheme promotes compact growth, prioritises sustainable transport modes including walking and cycling, and delivers energy-efficient residential units and community infrastructure. These measures align with the CAP's goals to reduce emissions, enhance sustainability, and support a net-zero future, as required under the Climate Action and Low Carbon Development Act, as amended.

## Regional Spatial And Economic Strategy 2019-2031

The Eastern and Midland Regional Spatial and Economic Strategy (RSES) 2019–2031 provides the statutory regional planning framework guiding the sustainable growth of the Eastern and Midland Region in accordance with *Project Ireland 2040* and the National Planning Framework (NPF). The RSES has statutory effect under Section 24 of the Planning and Development Act 2000 (as amended), and development plans and planning decisions are required to be consistent with its objectives.

The proposed development aligns strongly with the RSES strategic vision of promoting compact urban growth, sustainable transport patterns, housing delivery in accessible locations, and brownfield regeneration within the existing urban footprint of Dublin City.

It gives practical effect to both the Regional Policy Objectives (RPOs) of the RSES and the specific objectives of Chapter 5 – the Dublin Metropolitan Area Strategic Plan (MASP).

#### Strategic Vision and Regional Strategic Outcomes

The overarching vision of the RSES is:

*“To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.”*

The proposed development directly advances this vision by delivering a significant quantum of housing in a sustainable, accessible and well-serviced urban location, supporting the following Regional Strategic Outcomes (RSOs):

- Compact Growth and Urban Regeneration – through the redevelopment of a brownfield site within the existing built-up area of Dublin City.
- Integrated Transport and Land Use – by locating higher-density residential development in an area served by frequent public transport and close to daily services.
- Healthy Communities – by providing housing in proximity to schools, healthcare, parks and recreational facilities, supporting walkable neighbourhoods.
- Climate Action – by reducing reliance on private car travel and supporting lower-carbon living patterns.
- Improved Housing Choice – by contributing to apartment-led housing supply in a location appropriate for higher density residential development.

Under the RSES Settlement Strategy, Dublin City and Suburbs are identified as the highest tier in the regional hierarchy and are explicitly supported for consolidation, re-intensification and brownfield redevelopment

RPO 4.3 supports:

*“the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs.”*

The subject site, located in Beaumont, is firmly within the existing urban footprint of Dublin City and represents a suitable and sustainable location for higher-density residential development. The proposal responds directly to this objective by:

- Re-using underutilised brownfield land;
- Providing a compact apartment-led scheme at an appropriate urban scale; and
- Avoiding unnecessary outward expansion of the city.

The development therefore fully accords with the RSES requirement to direct growth towards existing urban areas, rather than peripheral or greenfield locations.

The RSES identifies housing delivery in the Dublin Metropolitan Area as a strategic priority, recognising the need to significantly increase housing output to meet demographic demand and maintain regional competitiveness

The MASP estimates that approximately 7,500 residential units per annum are required within the metropolitan area to 2040, with a strong emphasis on apartment-led delivery in accessible locations.

The proposed 100-unit scheme makes a meaningful contribution to this objective by:

- Delivering a critical mass of housing on a single brownfield site;
- Supporting efficient land use at an appropriate urban density; and
- Providing a form of development aligned with changing household composition and urban living patterns.

In addition, RPO 9.4 supports apartment design standards that encourage a wider demographic profile, including families and older persons. The scale and typology of the proposed development are consistent with this objective and with national apartment guidelines applicable to Dublin City.

#### Dublin Metropolitan Area Strategic Plan (MASP)

Chapter 5 of the RSES sets out the Dublin Metropolitan Area Strategic Plan (MASP), which provides a coordinated framework for accommodating population and employment growth within the metropolitan area in a compact and sustainable manner.

The MASP vision is to:

*“Build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life.”*

The proposed development aligns closely with this vision by delivering housing in a location that maximises accessibility, minimises car dependency, and integrates with existing services and infrastructure.

A central MASP objective is the achievement of at least 50% of new housing within or contiguous to the built-up area of Dublin City and suburbs

The subject proposal:

- Is located entirely within the existing urban footprint;
- Represents a brownfield redevelopment opportunity; and
- Avoids the need for additional greenfield land release.

#### **Evaluation of Consistency**

The proposed apartment development demonstrates a high level of compliance with the Eastern and Midland Regional Spatial and Economic Strategy 2019–2031, and in particular with the Dublin Metropolitan Area Strategic Plan (MASP) set out in Chapter 5.

The development:

- Supports compact urban growth and brownfield regeneration;
- Delivers much-needed housing in a highly accessible location;
- Aligns residential density with public transport provision;
- Integrates with existing social and community infrastructure; and

- Advances regional objectives relating to climate action, quality of life and sustainable development.

Accordingly, the proposal represents an appropriate and sustainable form of development in accordance with the strategic planning framework for the Dublin Metropolitan Area and the wider Eastern and Midland Region.

### Urban Development & Building Heights: Guidelines For Planning Authorities, 2018

The Building Height Guidelines 2018 set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the NPF. There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.

SPPR 1 of the Guidelines state the following:

*In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.*

The imposition of height or numerical restriction at the subject site would therefore be contrary to Specific Planning Policy Requirement 1 which notes that blanket numerical limitations on building height shall not be provided for through statutory plans.

Section 3.1 of the Guidelines go on to state:

*In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:*

| Development Management Criteria                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Evaluation of Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>At the Scale of the Town</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.                                                                                                                                                                                                                                                                                                                                                     | <p>The site is well connected with public transport services. The site is located within short walk of a high-frequency bus service on Swords Road Lower, where services run from North Fingal, Swords, Dublin Airport, and Ballymun into the city. Even in off peak periods, there is typically no more than a five-minute wait for a bus to the City Centre. Beaumont Road is also serviced by buses to Dublin Airport, Ballinteer and Dundrum.</p> <p>The site is within a well-established residential suburb location on the north side of Dublin which is within walking distance of a multitude of services, exceptional public transport options and local amenity and employment opportunities.</p> |
| Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks and protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. | <p>The proposed development seeks to deliver an appropriate form and scale of residential development at a site that is well connected to several different existing centres. All of which provide a range of shopping, public houses, restaurants, shops and other facilities, services, and recreational uses. These are all within walking distance of the site.</p> <p>There are no protected structures on the subject site or sensitive landscapes identified on the site.</p>                                                                                                                                                                                                                         |
| On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.                                                                                                                  | The proposed development consists of four blocks ranging in height from three to six storeys. The proposed 6-storey block introduces a point of visual emphasis within a largely homogeneous urban context, improving legibility and assisting orientation by providing a recognisable reference point within the local townscape. The overall height and massing strategy ensures appropriate transitions, reinforces key site connections, and provides suitable setbacks from neighbouring residential areas.                                                                                                                                                                                             |
| <b>At the Scale of the Neighbourhood</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape                                                                                                                                                                                                                                                                                                                                         | <p>The proposed development has been carefully designed to respond to the existing situation surrounding the site.</p> <p>The stepping of the buildings from 3 to 6 storeys, with the tallest element positioned to the east of site, protects the residential development which surrounds the site to the north and west.</p> <p>The positioning of blocks has created a development that is considered and is a positive contribution to the area and providing an attractive development that steps appropriate to meet the neighbouring properties.</p>                                                                                                                                                  |

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| The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.                                                                                                                                                                                                                                                                    | The proposal is broken into 4 blocks, two of which are joined, which step in height to meet the neighbours at Ellenfield Road. The size and shape of all of the blocks, along with the variation in height, and use of materials have been chosen to ensure an attractive interesting development.                                                                                                        |
| The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).                 | The proposed development makes a positive contribution to the legibility of the site and wider urban area by introducing a clearly defined layout with distinct blocks, varied building heights, ranging from 3 to 6 storeys, and active frontages that respond to the surrounding                                                                                                                        |
| Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                           |
| The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.                                                                                                                                                                                                                                                                                                    | The development will significantly improve the mix of residential types in the area which is dominated by two storey housing. The proposal comprises of a mix of unit types including 17 no. studios, 45 no. 1-bed units, 27 no. 2-bed units and 11 no. 3-bed units. The provision of these units, in a largely two storey housing area will enhance the unit typologies currently available in the area. |
| <b>At the scale of site/building</b>                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                           |
| The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light                                                                                                                                                                                                                            | The layout and design of the buildings and the gaps between them have been orientated and designed to ensure the maximum amount of natural daylight, ventilation and views within the development while also ensuring there is no loss of light or overshadowing to the existing neighbours.                                                                                                              |
| Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’                                                                                            | IES have completed a Sunlight Daylight Report confirming the impact is acceptable.                                                                                                                                                                                                                                                                                                                        |
| Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment |                                                                                                                                                                                                                                                                                                                                                                                                           |

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| against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Specific Assessments</b>                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. | The proposed development, while in part taller than the surrounding buildings, will not result in a new microclimate in the area due to the small nature of the site and the limited area of the taller 6 storey element. Adjoining residential areas are 2-3 storeys in height and the proposed development is at 3 storeys where it adjoins these areas. It is not anticipated that there will be a cumulative impact from the development. |
| In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.                                          | Altamar has prepared an AA/NIS and ECIA. The reports do not identify any significant impact on protected flora or fauna, or on designated European sites.                                                                                                                                                                                                                                                                                     |
| An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.                                                                                                                                                                            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| An assessment that the proposal maintains safe air navigation.                                                                                                                                                                                                                                        | The subject site is not within a flight path and is therefore not expected to impact air navigation.                                                                                                                                                                                                                                                                                                                                          |
| An urban design statement including, as appropriate, impact on the historic built environment                                                                                                                                                                                                         | A detailed Design Statement prepared by Henry J Lyons is included which demonstrates that this development is appropriate to its context and will not have a detrimental impact on the wider area.                                                                                                                                                                                                                                            |
| Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.                                                                                                                                                                             | The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites. Please refer to all required reports submitted by Altamar accompanying this application.                                                                                                                                                                                                                       |

We note the following compliances with the SPPRs of the Guidelines:

| Specific Planning Policy Requirement                                                                                                                                                                                                                                                    | Evaluation of Consistency                                                                                                                                                                                                                                                                                                               |
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| <b>SPPR 1</b><br>In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where | The site is well connected to high frequency and capacity public transport services.<br><br>The subject site is served by a range of transport options. Swords Road Bus Corridor is close to the subject site and is served by a wide range of Dublin Bus routes. It will become the A-spine for the planned BusConnects network as one |

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| <p>increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p>                                                                                                                                                                                                                                                                                                                                                                       | <p>of the future phases of delivery of the BusConnects programme.</p>                                                                                                                                                                                                                 |
| <p><b>SPPR 2</b><br/>In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</p> | <p>The proposed residential development accords with the residential zoning of the site. Alternative non-residential uses are not permitted on the Z1 lands.</p>                                                                                                                      |
| <p><b>SPPR 3</b><br/>It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p>                                                                                                          | <p>The proposal is in accordance with the Development Management Criteria as set out in the table above.</p> <p>This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p> |

#### Evaluation of Consistency

The proposed development is located on a brownfield site along Beaumont Road, a suburban area of Dublin city, which is served by high quality bus transport. In addition, there are several neighbourhood centres within a short walk of the site. Therefore, the subject site is considered an appropriate site for increased building heights in line with the Building Heights Guidelines.

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The application proposes a development ranging principally ranging in height up to 6 storeys.

The proposed development will integrate appropriately with the surroundings, having regard to the location of the subject site within an existing and emerging built-up area along Beaumont Road. It is well served by public transport and in proximity to employment locations, services and facilities.

It is our opinion that the subject site is capable of and appropriate for additional height and density having regard to the introduction of the *National Planning Framework* and the *Building Height Guidelines* which encourages increased height and density in highly sustainable and underused sites such as these. The proposed development has been designed to ensure the protection and amenity not only of future occupants of this development but also those of the existing residents in the adjacent properties. To this end the highest elements have been located furthest away from existing residents at the least sensitive locations within the subject site.

### Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities, 2024

The Compact Settlement Guidelines 2024 set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Compact Settlement Guidelines 2024 will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this Planning Application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Section 1.3.2 of the Guidelines relating to Compact Growth state that “*priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing*

*to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens”.*

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. As set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, The ‘City – Urban Neighbourhoods’ category includes:

- (i) *the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses,*
- (ii) *strategic and sustainable development locations,*
- (iii) *town centres designated in a statutory development plan, and*
- (iv) ***lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area.***

*These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.*

The site can be characterised as a ‘City - Urban Neighbourhoods’ based on compliance with option (iv) - *lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area.*

Section 3.4 of the Guidelines also states that the ‘*application of the density ranges in the preparation of statutory development plans and in the consideration of individual planning applications will be subject to local determination by the planning authority, or by An Bord Pleanála in the case of an appeal or direct application.*

*The density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment.”*

A two-step approach to refining density is then provided for, as follows:

**Step 1:**

While densities within the ranges set out in Table 3.1 will be acceptable, the Guidelines state that ‘*planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations.*’

Having regard to Table 3.8 of the Guidelines (extract below), the site can be characterised as: (1) “A High Capacity Public Transport Node or Interchange” and also (2) an “Accessible Location” – given its proximity and accessibility to the BusConnects A-Spine route.

The site is within 20m of the A1 Spine Route serving Beaumont to City Centre and Knocklyon Corridor (Stop ID 217 is located directly adjacent the site).

The site is also within 500 – 630m of the A2 (Dublin Airport to Dundrum via City Centre) and A4 (Swords to Dundrum via City Centre) Spine Routes (Stop ID 1641).

The A2/A4 bus route stop can be accessed from the site via Ellenfield Park (DCC Public Park) (500m) and also via Ellenfield Road/Shantalla Road (630m).

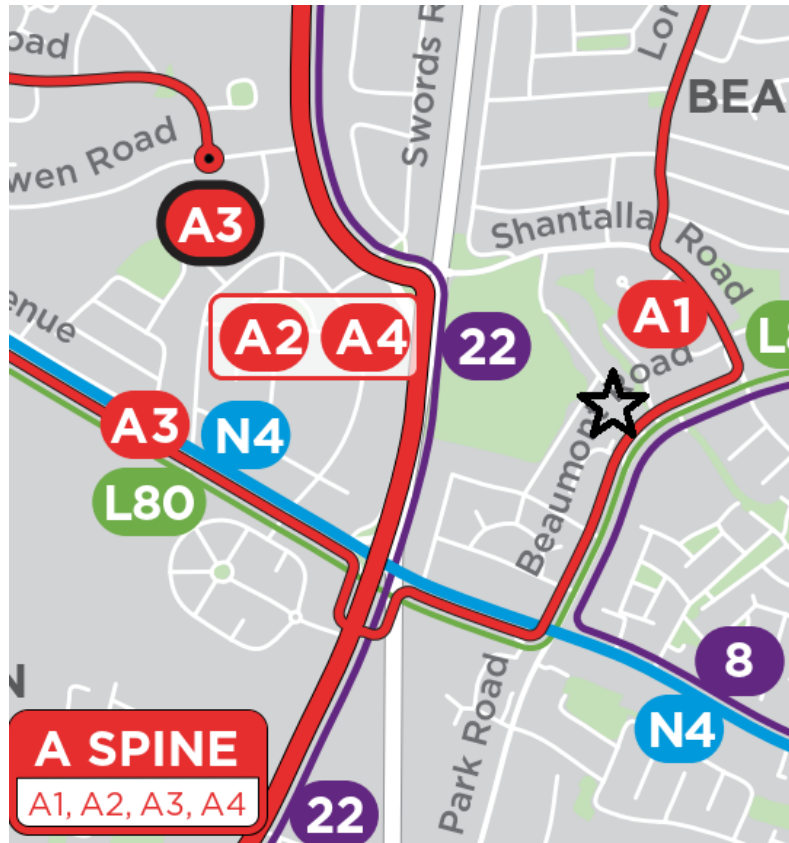


*Figure 12: Site Location in relation to A-Spine Bus Routes*

The accessibility of the site to frequent bus services is further reflected in the NTA PTAL mapping which indicates that the site is located within a “Medium-High Level of Service” location.

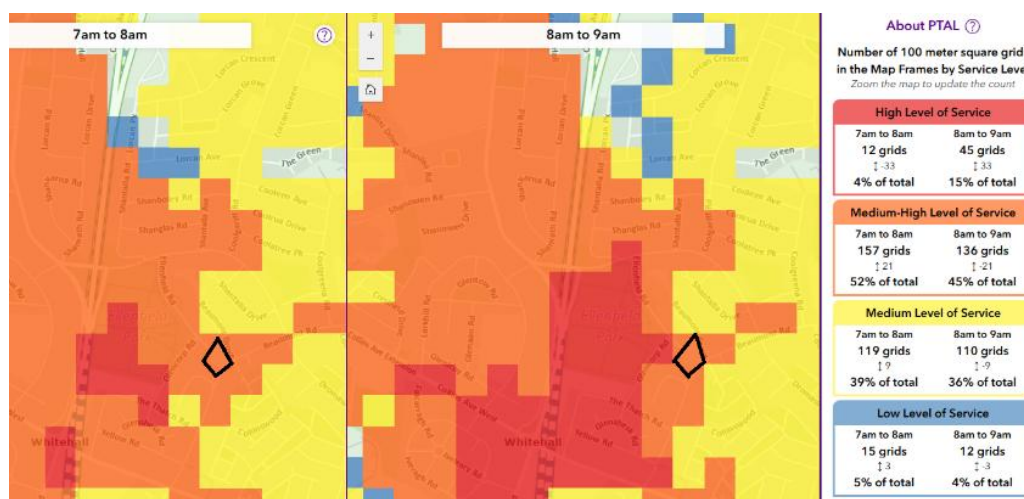


Figure 13: Site Location on NTA pTAL Maps

The frequency of the A-Spine services will result in peak time services going to and from the City Centre at 1 every 3-4 minutes along the Swords Road.

The site is demonstrably well served by public transport, including a BusConnects Core Bus Corridor and multiple frequent bus services.

Having regard to the accessibility of the site under Table 3.8 it is considered that a density slightly above the mid-density range of 50 dph to 250 dph (i.e. 150 dph) is acceptable in principle on the site.

Furthermore, as demonstrated in the Public Transport Capacity Analysis carried out by Waterman Moylan Engineers, there is adequate capacity in existing bus services to accommodate additional bus demand arising from the proposed development.

It is therefore submitted that the proposed density of 172 dph is consistent with the Guidelines.

## Step 2:

In refining density, the Guidelines require new development to “*respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment.*”

The 5 criteria outlined under Step 2 are assessed below:

*(a) The evaluation of impact on local character should focus on the defining characteristics of an area, including for example, the prevailing scale and mass of buildings, urban grain and architectural language, any particular sensitivities and the capacity of the area for change.*

*While it is not necessary to replicate the scale and mass of existing buildings, as most urban areas have significant capacity to accommodate change, it will be necessary to respond in a*

We refer to the Townscape and Visual Impact Assessment prepared by Park Hood.

The site is categorised as poor townscape of low sensitivity and very capable of accommodating change in townscape / landscape and visual terms. The site carries no environment, amenity, heritage, visual amenity or landscape designations and possesses nothing that would be categorised as sensitive in terms of townscape character or features.

*positive and proportionate way to the receiving context through site responsive design.*

The townscape aside the Application Site is a mix of ordinary and good townscape of medium sensitivity made up of extensive residential housing estates and areas with notable and valued open spaces such as Ellenfield Park.

There are no distinctive or notable built or natural features, built elements or architecture that will be lost as part of the site redevelopment.

The subsequent development will result in significant changes to the site character due to introduction of new building blocks that will completely alter the baseline setting on completion though the retention of over 25 % of the Application Site as landscaped areas, public open space, public realm and a significant linkage provision do serve to balance the effect in terms of townscape amenity, placemaking and sense of place.

There will inevitably be substantial and significant effects to areas on and aside the proposed development site due to the change in use from a vacant or former commercial land use to a taller residential apartment scheme and complex that will rise above the adjacent lower buildings and vegetation. The set back from adjacent roads and reduction of building heights towards existing residential properties ensures that the development, while sizeable, does not have overbearing characteristics.

The proposal will include positive effects in terms of placemaking and local townscape character in terms of improved streetscape providing a landmark building at this new nodal point via built-form variation and identity. Further by giving this part of Beaumont such variation in scale and form, it will introduce vitality into the townscape as well as being a readable and notable connection point linking the previously unconnected Beaumont and Ellenfield areas.

The existing cityscape and built environment have a density of built form that ensures the majority of areas in this part of the city including the public park at Ellenfield Park will

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>experience negligible or no effects due to the proposal being visually obscured i.e., impacts are assessed as insignificant. There will be no effects to any designated historic sites / environments at a local or city-wide level.</p> <p>The proposal offers the opportunity to act as a connection point between Beaumont Road and Ellenfield that is currently absent. This link would be a significant enhancement in terms of local community and amenity provision via a shared external public realm and landscaped parkway through the site (and the removal of an unsightly wall on Ellenfield Road).</p> <p>The distinctive buildings will be significant additions to the local architecture skyline and townscape being a notable change in terms of building type and form.</p> <p>However, such a change does not translate to adverse as the existing townscape has the capacity to accommodate and absorb this proposal without detriment to its character or visual amenity.</p> <p>Such a change will provide enhanced townscape legibility and offer variation and relief from the prevailing repetitive building type in the Dublin 9 area.</p> |
| <p><i>(b) Historic environments (built and landscape heritage) can be particularly sensitive to change. It is a recommendation of these Guidelines that a Built Heritage Character Assessment inform the preparation of statutory development plans that relate to historic environments. The assessment should describe for example, the historical evolution, urban form, street pattern, building typologies and building plots that define the historic environments. This will better inform the designation of Architectural Conservation Areas under Section 84 of the Planning and Development Act 2000 (as amended) and the integration of new buildings and street patterns with historic environments. The provisions contained within Part (IV) of the Planning and Development Act regarding architectural</i></p> | <p>The site does not contain nor is it located adjacent any protected structures.</p> <p>There are no buildings listed on the National Inventory or Architectural Heritage (NIAH) within or adjoining the site.</p> <p>The site is not located within an Architectural Conservation Area (ACA).</p> <p>The site is not located within any protected views or prospects.</p> <p>Given the above it is not considered that the site is located in a part of the city that is historically sensitive in terms of capacity to accommodate higher density development.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| <p><i>heritage and the requirement to protect the character and setting of a protected structure must also be considered. The Architectural Heritage Protection, Guidelines for Planning Authorities (DEHLG) provides useful guidance in relation to the protection of architectural heritage in urban areas. Shaping the Future Case Studies in the Reuse in Historic Urban Environments (DAHG) 2012 provides useful guidance where building refurbishment is proposed.</i></p>                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><i>(c) Evaluation of impact on the environment and on protected habitats and species must be considered under the requirements of the Environmental Impact Assessment and Habitats Directives. Development proposals should seek to protect and enhance important natural features (habitats and species) and should avoid the degradation of ecosystems. Habitat mapping undertaken as part of a plan making process can give a good indication of natural heritage features and corridors within an area. Appendix C sets out suggested threshold for submission of an Ecological Impact Assessment (EIA) and all site surveys and the associated description of the site should detail the natural features that exist within a site to allow for consideration of impact on biodiversity and natural features.</i></p> | <p>Altamar has prepared an AA/NIS and ECIA.</p> <p>The reports do not identify any significant impact on protected flora or fauna, or on designated European sites.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><i>(d) It will be necessary to consider the impact of a proposed development on the amenities of residential properties that are in close proximity to a development site. The key considerations should include privacy, daylight and sunlight, and microclimate. These considerations are addressed in more detail in Chapter 5 Development Standards.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>A full 'Daylight, Sunlight and Overshadowing Study' has been submitted with this application which outlines the analyses undertaken to quantify the Sunlight and Daylight performance of the proposed Beaumont Road development.</p> <p><u>Daylight to Proposed Development</u><br/>BS EN 17037-2018+A1-2021 National Annex (BRE Guide 3rd Edition) has been analysed (whilst IS EN 17037-2018+A1-2021 (BRE Guide 3rd Edition) non-annex results have also been included in an appendix for completeness). Across the proposed development, 100% of the tested rooms are achieving the daylight provision targets in accordance with the BRE Guide.</p> <p><u>Daylight to Existing Buildings</u><br/>When compared to the Existing Situation, of the 146 no. points tested, 100% have a Proposed</p> |

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|  | <p>VSC value greater than 27% or not less than 0.8 times their former value compared to the Existing Situation, thus complying with the BRE Guidelines.</p> <p><u>Sunlight to Proposed Development</u><br/>Of the 100 no. points tested, 90 no. points (90%) meet the BRE Guide 3rd Edition/IS/BS EN 17037-2018+A1-2021 sunlight exposure recommendations of greater than 1.5 hours on March 21st. When including bedrooms as habitable spaces this increases to 94 no. points (94%). Where windows do not meet this recommendation, this is predominantly as a result of their orientation. Overall, the sunlight provision results to the proposed development in accordance with IS/BS EN 17037:23018 are performing to a very high standard due to the fact that not all spaces face south.</p> <p><u>Sunlight to Existing Buildings</u><br/>When compared to the Existing Scheme, 91% of the tested points (10 out of 11 no.) meet the BRE recommended values. These results highlight that the proposed development will have negligible impact to the sunlight received to these existing neighbouring properties. The point tested that falls below the <u>winter</u> recommendations is one window at No. 78A Beaumont Grove to the east of the development. The same window achieves the Annual Probable Sunlight Hours (APSH) results for living room windows. This winter result can be noted as a minor adverse impact to this property. Furthermore, although not included in this assessment it should also be taken into consideration that there are existing trees that will have some impact on the sunlight during the winter months even in the existing case.</p> <p><u>Shadow Impact on Existing Amenity Spaces</u><br/>On March 21st the vast majority of existing amenity spaces (97.5%) will receive the same levels of sunlight with the proposed development in place when compared to the existing scenario. Of the 41 no. existing private gardens assessed only one amenity space (No. 78 Beaumont Road) falls marginally outside the guidelines (73% rather than 80%) and therefore it can be concluded that there will be a minor</p> |
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|                                                                                                                                                                      | adverse impact to this garden. Although not included in this assessment it should also be taken into consideration that there are existing trees along Beaumont Grove that will already be impacting on the sunlight to this garden space. |
| <i>(e) In all settlements, it will be important to ensure that water supply and wastewater networks (including treatment works) can service any new development.</i> | This is confirmed by the Confirmation of Feasibility and Statement of Design Acceptance from Uisce Eireann submitted with the water services proposals outlined in the Waterman Moylan documentation.                                      |

**Having regard to the above it is considered that proposed 172 dph density is appropriate for this site and location and has been properly established and refined under the criteria set out in the Sustainable & Compact Guidelines.**

Other relevant policies in the Guidelines are reviewed as follows:

| Policy and Objective                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 3.1 and Table 3.1 It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.       | <p>The subject site is served by a range of transport options. The site is located approximately 500metres from the Swords Bus Corridor which connects Dublin City Centre with Swords. The bus corridor to the west of the site will become the A-spine for the planned Bus Connects network as one of the future phases of delivery of the Bus Connects programme.</p> <p>Therefore, the site is considered to be a High Capacity Public Transport Node or Interchange within a City – Urban Neighbourhood.</p> <p>The density appropriate to this site is identified as being in the range of 50uph to 250uph. Therefore, the proposed density of 172 uph net is considered appropriate to this accessible, urban location.</p> |
| 4.1 It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking. | Waterman Moylan have confirmed that the proposed development is in accordance with DMURS. A full compliance statement has been submitted as part of Waterman Moylan's Engineering Statement (Section 5.7) included with this application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| <p>4.2 It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Please see the assessment in the table directly below this which confirms the development is in accordance with Section 4.4.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>5.1 It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</p> <p>In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a planned basis, having regard to the overall approach to public park provision within the area.</p> <p>In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.</p> <p>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that</p> | <p>Sections 15.8.6 of the DCC Development Plan state that normally a provision of 10% of the site area is required as public open space within new residential developments. However, Section 15.8.7 clarifies that:</p> <p><i>“Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park. In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective. Financial contributions in lieu of public open space will only be applicable in schemes of 9 or more units. The details on the value of the contribution in lieu and other exemptions are set out in the Dublin City Section 48 Development Contribution Scheme and any future amendments thereof.”</i></p> <p>The LRD Opinion from DCC states the following in relation to Public Open Space:</p> <p><i>“The site area is serviced by Ellenfield Park and no public open space is required within the site. A financial contribution in lieu of public open space is therefore required.”</i></p> |

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| <p>a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site</p> | <p>As a result the open spaces within the proposed development are designed and intended as communal open spaces. The proposed development will provide c.1,266 sq.m net in total of communal open space comprising a main, central space, along with an additional area east of the apartment block and a small area to the west adjoining the two duplex blocks.</p> <p>This provision equates to 20.5% of the site area and is significantly greater than the minimum communal open space provision required under the Apartment Guidelines. In addition c.616 sq.m of ancillary landscape space will be provided.</p> |
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The Compact Settlement Guidelines 2024 outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing:

| SPPR 1 – Separation Distances                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | EVALUATION OF CONSISTENCY                                                                                                                                                                                                                                              |
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| <p>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p> <p>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</p> | <p>The proposed development complies with this policy. The proposed blocks and housing units have separation distances greater than 16 metres between opposing windows.</p> <p>Please refer to the Site Layout Plan prepared by Henry J Lyons for further details.</p> |
| SPPR 2 – Private Open Spaces for Houses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | EVALUATION OF CONSISTENCY                                                                                                                                                                                                                                              |

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| <p>It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:</p> <p>1 bed house: 20 sq.m</p> <p>2 bed house: 30 sq.m</p> <p>3 bed house: 40 sq.m</p> <p>4 bed + house: 50 sq.m</p> <p>A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.</p> | <p>N/A – This is an apartment and duplex scheme.</p>                                                                                                                                                                                                                                                                                    |
| <p><b>SPPR 3 – Car Parking</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p><b>EVALUATION OF CONSISTENCY</b></p>                                                                                                                                                                                                                                                                                                 |
| <p>It is a specific planning policy requirement of these Guidelines that:</p> <p>(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.</p> <p>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly</p>                                                                           | <p>In line with this policy of no more than one space per dwelling, the proposed development will provide 42 no. spaces for the residential units equating to c. 0.4 spaces per unit. As set out in the engineering reports, this is considered acceptable due to the site's proximity to a high-quality public transport corridor.</p> |

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| <p>when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                          |
| <p><b>SPPR 4 – Cycle Parking and Storage</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p><b>EVALUATION OF CONSISTENCY</b></p>                                                                                                                                                                                                                                                  |
| <p>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:</p> <p>(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.</p> <p>(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.</p> | <p>This proposed development provides 150 no. resident bicycle parking spaces and 50 no. visitor bicycle parking spaces in accordance with the Development Plan standards.</p> <p>The storage areas are safe, secure and overlooked.</p> <p>This is fully compliant with the policy.</p> |

### Evaluation of Consistency

Overall, it is considered that the proposed development will quantitatively and qualitatively provide a high-quality apartment scheme that is in line with the Compact Settlement Guidelines.

### Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

The Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025, support compact and sustainable urban growth by aligning apartment development with updated national planning policies and housing strategies. They reflect the National Planning Framework and Housing for All and incorporate the Sustainable Residential Development and Compact Settlement Guidelines 2024. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2023, and introduce updated design parameters for apartment mix, space standards, amenity provision, and redevelopment of existing buildings. Policies contained within these Guidelines now only include matters relating to:

- *Apartment mix;*
- *Internal space standards for different types of apartments;*
- *Dual aspect ratios;*
- *Floor to ceiling heights;*
- *Apartment to stair/lift core ratios;*
- *Storage spaces; and*
- *Amenity spaces including balconies/patios.*

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to.

| SPPR 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | EVALUATION OF CONSISTENCY                                                                                                                                                                                                                                                      |
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| <p>(A) <i>With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), <b>there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</b></i></p> <p>(B) <i>Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any</i></p> | <p>The development consists of 100 no. units with a unit mix of:</p> <ul style="list-style-type: none"> <li>• 17 no. studios – 17%</li> <li>• 45 no. 1-beds – 45%</li> <li>• 27 no. 2-beds – 27%</li> <li>• 11 no. 3 beds – 11%</li> </ul> <p>This is in line with SPPR 1.</p> |

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| <p><i>single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                          |
| <p><b>SPPR 2</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>EVALUATION OF CONSISTENCY</b></p>                                                                                                  |
| <p><i>The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed those set out below:</i></p> <p><i>Studio Apartment (1 person): 32 sq.m</i></p> <p><i>1-Bedroom Apartment (2 persons): 45 sq.m</i></p> <p><i>2-Bedroom Apartment (3 persons): 63 sq.m</i></p> <p><i>2-Bedroom Apartment (4 persons): 73 sq.m</i></p> <p><i>3-Bedroom Apartment (4 persons): 76 sq.m</i></p> <p><i>3-Bedroom Apartment (5 persons): 90 sq.m</i></p> <p><i>These floor area parameters shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.</i></p>                                                                              | <p>Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size, therefore in line with SPPR 2.</p>   |
| <p><b>SPPR 3</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p><b>EVALUATION OF CONSISTENCY</b></p>                                                                                                  |
| <p><i>Minimum Number of Dual Aspect Apartments in Apartment Schemes</i></p> <p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p><i>(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</i></p> <p><i>(ii) For building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25 hectares, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the</i></p> | <p>Dual Aspect is 38% in the development; the current proposal exceeds these standards as set out in the Housing Quality Assessment.</p> |

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| 25% minimum outlined above. This is subject to the achievement of overall high design quality in other aspects.                                                                                                                                                                                |                                                                           |
| <b>SPPR 4</b>                                                                                                                                                                                                                                                                                  | <b>EVALUATION OF CONSISTENCY</b>                                          |
| Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality. | Ground Floor apartments floor to ceiling height will be a minimum of 2.7m |
| <b>SPPR 5</b>                                                                                                                                                                                                                                                                                  | <b>EVALUATION OF CONSISTENCY</b>                                          |
| There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.                                                                                                                                                | The development is compliant with SPPR 5.                                 |
| <b>SPPR 6</b>                                                                                                                                                                                                                                                                                  | <b>EVALUATION OF CONSISTENCY</b>                                          |
| The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.                 | Noted.                                                                    |

#### **EVALUATION OF CONSISTENCY**

The proposed development is in accordance with the criteria relating to apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment cores, storage spaces and amenity spaces. Henry J Lyons have prepared a Housing Quality Assessment which demonstrates how the proposal is in accordance with the space requirements in Appendix 1. Overall, it is considered that the proposed development will provide a high-quality apartment scheme that is in line with the Apartment Guidelines.

## **DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019**

The DMURS was first published in 2013 and has since been updated in May 2019. This document sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

#### EVALUATION OF CONSISTENCY

The proposed design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of a low parking actively promotes a modal shift to alternative forms of transport while also creating a high quality public open space in the area. This scheme prioritises pedestrians and cyclists through the development. Permeability for cyclists and pedestrians is therefore prioritised. A full compliance statement has been submitted as part of Waterman Moylan's Engineering Statement (Section 5.7) included with this application.

### Guidelines For Planning Authorities on Childcare Facilities, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings. Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2022 states the following:

*"Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**"*

#### EVALUATION OF CONSISTENCY

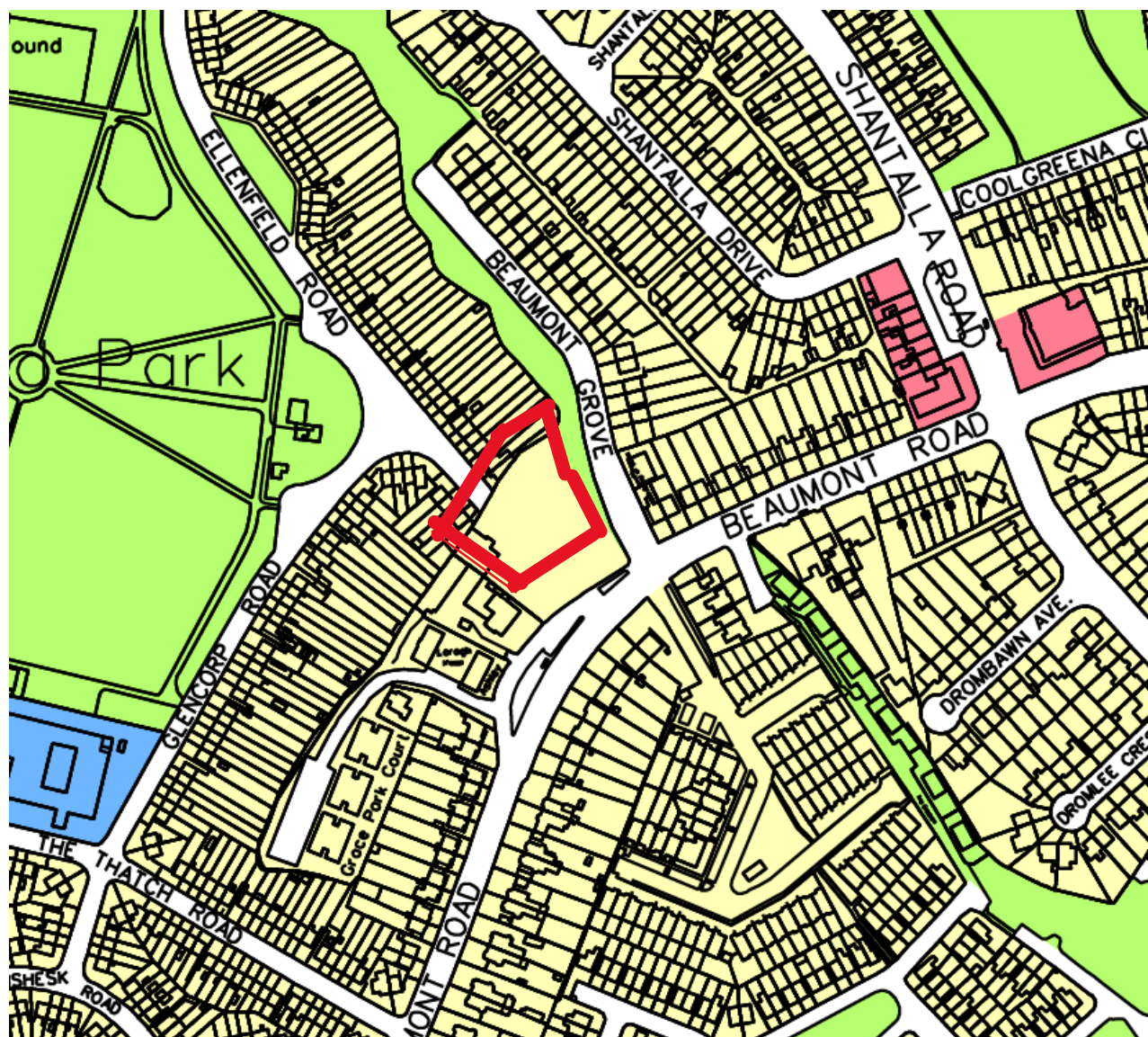
The proposed development includes 38 no. two and three bed units. Based on the requirement for 20 no. childcare spaces for every 75 no. dwellings, when one beds and studios are excluded, the proposal would not trigger the requirement for any creche or childcare space as it is less than the 75 unit threshold.

The submitted Community and Social Infrastructure Audit provides a detailed breakdown of the existing creches within the locality. Given the minimal childcare demand generated by the proposed development, its unit typology, alongside the shifting age profile and demographic needs of the population, as well as planned new facility in the area, it is considered that additional childcare facilities at this location would not be necessary and can be effectively absorbed by the existing and planned facilities network.

## Local Planning Policy

### Dublin City Development Plan 2022-2028

The site is zoned as ‘Sustainable Residential Neighbourhoods – Zone Z1’ with the objective “To protect, provide and improve residential amenities”. It also has Z9 zoning which allows Amenity/Open Space Lands/Green Network with the objective to “To preserve, provide and improve recreational amenity, open space and ecosystem services.”



#### PRIMARY LAND USE ZONING CATEGORIES<sup>4</sup>

- Zone Z1 Sustainable Residential Neighbourhoods
- Zone Z9 Amenity /Open Space Lands /Green Network

Figure 14: Map G of the Dublin City Council Development Plan 2022-2028

The proposed development is for residential use is a permissible use in this site zoned under Z1 under the current Development Plan.

### **Sustainable Residential Neighbourhoods– Zone Z1**

Land-Use Zoning Objective Z1: To protect, provide and improve residential amenities.

The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.

Chapter 5: Quality Housing and Sustainable Neighbourhoods, which deals with policies and objectives for residential development, making good neighbourhoods and standards, respectively, should be consulted to inform any proposed residential development (see also Chapter 15: Development Standards).

In order to achieve a sustainable tenure mix in neighbourhoods, the Build to Rent residential typology is predominantly in the open for consideration category.

In both new and established residential areas, there will be a range of uses that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship with the immediate community and have high standards of amenity, such as childcare facilities, schools, community facilities, personal services, local shops, open space, recreation and amenity uses.

### **Z1 – Permissible Uses**

Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre.

### **Z1– Open for Consideration Uses**

Allotments, beauty/ grooming services, bed and breakfast, betting office, Build to Rent residential, café/tearoom, car park, civic and amenity/recycling centre, garden centre/plant nursery, guesthouse, hostel (tourist), hotel, industry (light), laundromat, live/work units, media-associated uses, mobility hub, off-licence, off-licence (part), office, park and ride facility, petrol station, pigeon loft, postal hotel/motel, primary health care centre, public house, residential institution, restaurant, student accommodation, veterinary surgery.

The proposed development complies with the objectives of the Z1 zoning by delivering residential units and open space.

There is a small, linear section of the site at the eastern end, which is zoned Z9. The proposed communal open space within that area is considered compliant with the Z9 zoning.

### Inner Suburban and Inner City Sustainable Mixed-Uses – Zone Z9

Land-Use Zoning Objective Z9: To preserve, provide and improve recreational amenity, open space and ecosystem services.

Z9 lands are multi-functional and central to healthy place-making, providing for amenity open space together with a range of ecosystem services. They include all amenity, open space and park lands, which can be divided into three broad categories of green infrastructure as follows: public open space; private open space; and sports facilities. The provision of public open space is essential to the development of a strategic green infrastructure network. The chapters detailing the policies and objectives for landscape, biodiversity, open space and recreation, and their respective standards, should be consulted to inform any proposed development (see Chapter 10: Green Infrastructure and Recreation, and Chapter 15: Development Standards). The role of Z9 lands in providing ecosystem services, such as improved biodiversity and ecological connectivity, nature-based surface water management, flood attenuation, river corridor restoration and climatic resilience, is also increasingly being recognised. Generally, the only new development allowed in these areas, other than the amenity/recreational uses, are those associated with the open space use. These uses will be considered on the basis that they would not be detrimental to Z9 zoned lands.

#### Z9 – Permissible Uses

Allotments, cemetery, club house associated with the primary Z9 objective, municipal golf course, open space, public service installation.

#### Z9 – Open for Consideration Uses

Boarding kennel, café/ tearoom, caravan park/camp site (holiday), car park for recreational purposes, childcare facility, civic and amenity/recycling centre, community facility, craft centre/craft shop, crematorium, cultural/recreational building and uses, garden centre/ plant nursery, golf course and clubhouse, place of public worship, restaurant, shop (local), sports facility and recreational uses, water-based recreational activities.

## Chapter 5: Quality Housing and Sustainable Neighbourhoods

| Policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Evaluation of Consistency                                                                                                                                                                   |
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| <b>QHSN1 National and Regional Policy</b><br>To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines. | The proposed development will provide additional housing on this site within the existing built-up area of Dublin 9. This is in line with all regional and national policies.               |
| <b>QHSN6 Urban Consolidation</b><br>To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, back land development, mews development, re-use/adaption of existing housing                                                                                                                                                                                                                                                                                                                                    | The proposed development will provide new apartments at this inner suburban site in the established area of Dublin 9, in close proximity to existing services and public transport options. |

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| <p>stock and use of upper floors, subject to the provision of good quality accommodation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The site is currently vacant. The development will bring the site into residential use providing essential residential accommodation.</p>                                                                                                                                                    |
| <p><b>QHSN9 Active Land Management</b><br/>To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>It is in line with the consolidation of the urban area and active land management policies.</p> <p>As demonstrated by the previous grants of permission in the surrounding area, the scale, massing, height and density proposed are acceptable on this site.</p>                            |
| <p><b>QHSN10 Urban Density</b><br/>To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                 |
| <p><b>QHSN11 15-Minute City</b><br/>To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The proposed development will provide a high-density development which is cognisant of the character of the surrounding area.</p>                                                                                                                                                            |
| <p><b>QHSN12 Neighbourhood Development</b><br/>To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> <li>• build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;</li> <li>• integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city;</li> <li>• encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance;</li> </ul> | <p>There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools. The location of the site contributes to the accessibility of surrounding facilities for the daily needs of the residential development.</p> |

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| <ul style="list-style-type: none"> <li>• promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.</li> <li>• promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;</li> <li>• promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;</li> <li>• cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;</li> <li>• provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;</li> <li>• have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)';</li> </ul> <p>are designed to promote safety and security and avoid anti-social behaviour</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>QHSN13 Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025</b></p> <ul style="list-style-type: none"> <li>• To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long-term vision of improving the physical and mental health and well-being of the population at all stages of life.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>The proposed development will have a positive impact on the existing suburban area of Dublin 9; it is in proximity to existing services and public transport options.</p> <p>The architectural design has taken the character of the surrounding area into consideration throughout its design.</p> <p>Green spaces which provide communal and public open spaces incorporated into the layout of the development to serve both the proposed development and the wider area.</p> |
| <p><b>QHSN14 High Quality Living Environment</b></p> <p>To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The proposed development includes a public open space that will benefit the overall community.</p>                                                                                                                                                                                                                                                                                                                                                                               |

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| <p><b>QHSN17 Sustainable Neighbourhoods</b><br/>To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.</p>                                                                                                                                                                                                                                    | <p>The proposed development has been carefully designed to respond to the existing built-up area surrounding the site. The proposal includes significant open spaces that are accessible and offer high-quality amenity space.</p>                                                                                                               |
| <p><b>QHSN18 Needs of an Ageing Population</b><br/>To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2019.</p>                                                                                                         | <p>This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high-quality community facilities for the residents of the proposed development.</p>                                                                          |
| <p><b>QHSN21 Gated Residential Development</b><br/>It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.</p>                                                                                                                                                                                            | <p>The proposed development will not be a gated residential development and will include accessible and permeable open spaces.</p>                                                                                                                                                                                                               |
| <p><b>QHSN22 Adaptable and Flexible Housing</b><br/>To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015</p> | <p>All units are sized to allow some minor internal reconfiguration and adaptation.</p> <p>All the apartments meet or exceed the minimum standards.</p> <p>The units are designed to be suitable for older people/mobility impaired people and people with disabilities.</p> <p>Please see the Design Statement by Henry J Lyons Architects.</p> |
| <p><b>QHSN34 Social, Affordable Purchase and Cost Rental Housing</b><br/>To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.</p>                                                                   | <p>A Part V pack has been submitted as part of this application.</p>                                                                                                                                                                                                                                                                             |
| <p><b>QHSN36 High Quality Apartment Development</b><br/>To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social</p>                                                                                                                                                                                                                 | <p>The proposed development will provide a high-quality apartment development that includes quality private, communal and public amenity space and is located in close proximity to local facilities.</p>                                                                                                                                        |

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| infrastructure and other support facilities are available in the neighbourhood.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>QHSN37 Houses and Apartments</b><br>To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.                                                                                                                                                                                                                                                                                                                                           | The proposed development will provide Part V social housing, suitable serving family, individuals, couples and empty nesters.                                                                                                                                                                                                                                                                              |
| <b>QHSN38 Housing and Apartment Mix</b><br>To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1. | This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high-quality community facilities for the residents of the proposed development.                                                                                                                                           |
| <b>QHSN39 Management</b><br>To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.                                                                                                                                                                                                                                                                                                                  | All communal spaces are generously proportioned and regular in size to facilitate maintenance and upkeep.                                                                                                                                                                                                                                                                                                  |
| <b>QHSN47 High Quality Neighbourhood and Community Facilities</b><br>To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.                                                                                                                   | <p>A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site within the vicinity. The provision of additional population will support the vitality and vibrancy of these businesses.</p> <p>The proposed development will also provide for a new attractive public realm and high quality communal and public amenity space.</p> |

## Chapter 15: Development Standards

| Policy                                                                                                                                                                                                                                                                                                                      | Evaluation of Consistency                                                                                                                                                                                                                                                                                                      |
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| <b>15.4 Key Design Principles</b>                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                |
| <b>15.4.1 Healthy Placemaking</b><br>All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community | The proposed development is located in close proximity to a high-quality Dublin Bus public transport corridor. Dublin 9 is a well-established urban area which consists of a mixed-use environment. The proposed development further enhances the urban village by offering a mix of dwellings. The provision of cycle parking |

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| infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | within the scheme promotes a modal shift to active travel methods such as walking and cycling.                                                                                                                           |
| <b>15.4.2 Architectural Design Quality</b><br>Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.                                                                                                                                                                                                                                                                                                                                                                     | The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm.                                                                               |
| <b>15.4.4 Inclusivity and Accessibility</b><br>Development proposals, including all new large scale developments..... must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.                                                                                                                                                                                                                                                                | The proposed development is designed to be accessible to all.                                                                                                                                                            |
| <b>15.4.5 Safe and Secure Design</b><br>All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).                                                                                                                                                                                                                                                                                                           | The scheme is designed to ensure residents and visitors are interacting with a safe and secure environment.<br><br>Public open space and communal areas are designed so that active passive surveillance is in operation |
| <b>15.5.4 Height</b><br>Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.                                                                                                                                                                                                                                                                                                                                                                                                                                          | The proposed development ranges in height up to 6 storeys. The previous grant of permission demonstrates that the proposed site is an appropriate site for this height is in line with Appendix 3.                       |
| <b>15.5.7 Materials and Finishes</b><br>All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.                                                                                                                                                                                                                                                                                                                                                                                              | Please see the Architecture Elevations demonstrating high-quality low maintenance materials.                                                                                                                             |
| <b>15.5.8 Architectural Design Statements</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Please see the Architectural Design Statement by Henry J Lyons.                                                                                                                                                          |
| <b>15.5.9 Models and Photomontages</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Please see the verified views by Modelworks.                                                                                                                                                                             |
| <b>15.8 Residential Development</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                          |
| <b>15.8.1 Quality/Making Sustainable Neighbourhoods</b><br>Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), | The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.                                                  |

| Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                 |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
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| <b>15.8.2 Community and Social Audit</b><br>All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development.                                                                            | Please refer to the Social and Community Audit submitted as part of this application. This includes a Schools and Childcare Audit.                                                                                                                                                                                              |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| <b>15.8.3 Schools</b><br>planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand.                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                 |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| <b>15.8.4 Childcare</b><br>In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.                                                                                                                                                                                                                 | Given the proposed mix of units, predominantly studio, one and two beds, there is no requirement for a childcare facility to be provided. The Social Community Audit also demonstrates that there is capacity within existing facilities in the wider area to facilitate the anticipated childcare demand from the development. |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| <b>15.8.6 Public Open Space</b><br>Table 15-4: Public Open Space Requirements for Residential Development <table border="1"> <thead> <tr> <th>Landuse / Zoning</th><th>Requirement (minimum)</th></tr> </thead> <tbody> <tr> <td>Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)</td><td>10%</td></tr> <tr> <td>Residential development (Z12) (Z15)</td><td>25%</td></tr> </tbody> </table>                                    | Landuse / Zoning                                                                                                                                                                                                                                                                                                                | Requirement (minimum) | Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14) | 10% | Residential development (Z12) (Z15) | 25% | The LRD Opinion from DCC states the following in relation to Public Open Space: <p><i>“The site area is serviced by Ellenfield Park and no public open space is required within the site. A financial contribution in lieu of public open space is therefore required.”</i></p> |
| Landuse / Zoning                                                                                                                                                                                                                                                                                                                                                                                                                              | Requirement (minimum)                                                                                                                                                                                                                                                                                                           |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)                                                                                                                                                                                                                                                                                                                                                                                | 10%                                                                                                                                                                                                                                                                                                                             |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| Residential development (Z12) (Z15)                                                                                                                                                                                                                                                                                                                                                                                                           | 25%                                                                                                                                                                                                                                                                                                                             |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| <b>15.8.8 Play Infrastructure</b><br>In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition | Please see the Park Hood Design Statement included with this application.                                                                                                                                                                                                                                                       |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |
| <b>15.8.11 Management Companies/Taking in Charge</b>                                                                                                                                                                                                                                                                                                                                                                                          | A taken in charge plan has been submitted with this application as part of Henry J Lyons Architecture pack.                                                                                                                                                                                                                     |                       |                                                                |     |                                     |     |                                                                                                                                                                                                                                                                                 |

| 15.9 Apartment Standards                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                     |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
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| <p><b>15.9.1 Unit Mix</b></p> <p>Specific Planning Policy Requirement 1 states that housing 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 unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> | <p>This proposed apartment development provides for:</p> <ul style="list-style-type: none"><li>• 17 no. studios – 17%</li><li>• 45 no. 1-beds – 45%</li><li>• 27 no. 2-beds – 27%</li><li>• 11 no. 3 beds – 11%</li></ul> <p>The proposed unit mix is in compliance with SPPR1.</p> |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.2 Unit Size / Layout</b></p> <p>Table 15-5: Minimum Floor Area Requirements for Apartments</p> <table><tr><th>Unit Type</th><th>Bedspace</th><th>Floor Area Requirement (min)</th></tr><tr><td>Studio</td><td>1 bedspace</td><td>37 sq. m.</td></tr><tr><td>1 bed</td><td>2 bedspaces</td><td>45 sq. m.</td></tr><tr><td>2 bed</td><td>4 bedspaces</td><td>73 sq. m.</td></tr><tr><td>3 bed</td><td>5 bedspaces</td><td>90 sq. m.</td></tr></table>                              | Unit Type                                                                                                                                                                                                                                                                           | Bedspace                     | Floor Area Requirement (min) | Studio | 1 bedspace | 37 sq. m. | 1 bed | 2 bedspaces | 45 sq. m. | 2 bed | 4 bedspaces | 73 sq. m. | 3 bed | 5 bedspaces | 90 sq. m. | <p>Please see the Housing Quality Assessment which outlines unit areas. All units are in accordance with this section of the development plan.</p> |  |
| Unit Type                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Bedspace                                                                                                                                                                                                                                                                            | Floor Area Requirement (min) |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| Studio                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1 bedspace                                                                                                                                                                                                                                                                          | 37 sq. m.                    |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| 1 bed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2 bedspaces                                                                                                                                                                                                                                                                         | 45 sq. m.                    |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| 2 bed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4 bedspaces                                                                                                                                                                                                                                                                         | 73 sq. m.                    |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| 3 bed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 5 bedspaces                                                                                                                                                                                                                                                                         | 90 sq. m.                    |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.3 Dual Aspect</b></p> <p>Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations</p>                                                                                                                                                                                                                                                      | <p>38% of all units are multiple aspect this is in accordance with the development plan.</p>                                                                                                                                                                                        |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.4 Floor to Ceiling Height</b></p> <p>A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided.</p>                                                                                                                                                                                                                                                                                                    | <p>The proposed development meets this minimum ceiling height standard. A ceiling height of 2.7m has been applied across ground and 2.4m in upper floors throughout the development.</p>                                                                                            |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.5 Lift, Stair Cores and Entrance Lobbies</b></p> <p>Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.</p>                                                                                                              | <p>SPPR 5 of the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025) states: <i>“There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.”</i></p>           |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.6 Internal Storage</b></p> <p>Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>                                                                                                                                              | <p>Please see the HQA – This is in accordance with the Development Plan.</p>                                                                                                                                                                                                        |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |
| <p><b>15.9.7 Private Amenity Space</b></p> <p>Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the</p>                                                                                                                                                                                                                                                                                           | <p>Please see the HQA – This is in accordance with the Development Plan.</p>                                                                                                                                                                                                        |                              |                              |        |            |           |       |             |           |       |             |           |       |             |           |                                                                                                                                                    |  |

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| apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                            |
| <b>15.9.8 Communal Amenity Space</b><br>The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.                                                                                                                                                                                                                                                                                         | Please see the HQA – This is in excess of the Development Plan                                                                                             |
| <b>15.9.11 Security</b><br>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.                                                                                                                                                                      | The provision of public and communal open space as well as residential amenities throughout the development encourages active passive surveillance.        |
| <b>15.9.12 Access and Services</b><br>Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.                                                                                                                                                                                                                                                            | Pedestrian and vehicular access points are clearly identified.<br><br>The proposed development is designed in accordance with Part M building regulations. |
| <b>15.9.13 Refuse Storage</b><br>Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities.<br>All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy | Appropriate facilities are provided. These are in line with the previously permitted developments.                                                         |
| <b>15.9.14 Lifecycle Reports</b><br>All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.                                                                                                                                                                                                                                                                                                                           | This has been provided by Henry J Lyons Architects.                                                                                                        |
| <b>15.9.15 Operational Management and Maintenance</b><br>All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.                                                                                                                                                                                                      | Please see the Building Lifecycle Report provided by Henry J Lyons Architects as part of this submission.                                                  |

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| <p><b>15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise</b></p> <p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.</p> | <p>A Daylight and Sunlight Assessment is submitted with the application.</p>                                                                                                                                                                                                                                             |
| <p><b>15.9.16.1 Daylight and Sunlight</b></p> <p>A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>                                                                                          | <p>Following the initial impact assessments, the vast majority of windows in the surrounding existing properties will experience ‘negligible’ levels of impact. See Daylight and Sunlight Pre-Application Overview Document prepared by IES.</p>                                                                         |
| <p><b>15.9.16.2 Wind</b></p> <p>A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.</p>                                                                                        | <p>The proposed development, while in part taller than the surrounding buildings, will not result in a new microclimate in the area due to the small nature of the site and the limited area of the taller 6 storey element. It is not anticipated that there will be a cumulative wind impact from the development.</p> |
| <p><b>15.9.16.3 Noise</b></p> <p>All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014.</p>                                                                                                                                                                                  | <p>Noted. This has been accounted for within the proposal.</p>                                                                                                                                                                                                                                                           |

## Chapter 8: Sustainable Movement and Transport

| Policy                                                                                                                                                                                                                                                                                                                                                                                                                                       | Evaluation of Consistency                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <p><b>SMT1 Modal Shift and Compact Growth</b></p> <p>To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.</p> | <p>42 no. residential car parking spaces have been provided equating to a ratio of 0.4 cars per unit net. This is appropriate given its accessible location and the aim to create a modal shift to more sustainable modes of transport.</p> <p>Walking and cycling are prioritised throughout the scheme. The site’s proximity to high-quality public transport and the provision of bicycle spaces to ensure a modal shift to a more sustainable mode of transport is encouraged on this infill site.</p> |

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|                                                                                                                                                                                                                                                                                                                                                                                      | The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk from the site.                                                                                                                                                                                                                                                                                                                        |
| <b>SMT4 Integration of Public Transport Services and Development</b><br>To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places | The site is very well serviced in terms of public transport.<br><br>There are numerous bus routes which serve the site along the Beaumont Road and Swords Road.                                                                                                                                                                                                                                                                                                               |
| <b>SMT6 Mobility Management and Travel Planning</b><br>To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.                                       | The proposed development encourages a modal shift to sustainable transport methods. The scheme incorporates a reduced car parking provision. Please see the Traffic and Transport Assessment prepared by Waterman Moylan submitted as part of this application.                                                                                                                                                                                                               |
| <b>SMT7 Travel Plans for New and Existing Developments</b><br>To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>SMT9 Public Realm in New Developments</b><br>To encourage and facilitate the co-ordinated delivery of high-quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.                                                                       | Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high-quality public realm.<br><br>The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing developments adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company. |
| <b>SMT13 Urban Villages and the 15-Minute City</b><br>To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.                                                               | There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centres and schools.<br><br>As walking and cycling are prioritised throughout the scheme, the location of the site contributes to the aim of 15-minute city that encourages ease of accessibility to surrounding facilities for people of all ages and abilities by walking, cycling and public transport.                                       |
| <b>SMT16 Walking, Cycling and Active Travel</b><br>To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <p><b>SMT18 The Pedestrian Environment</b><br/>To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.</p> | <p>The proposed development will provide new open space. This will also be overlooked by the apartments making public open space a safe and attractive place to be.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>SMTO10 Walking and Cycling Audits</b><br/>Permission for major development (&gt;100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.</p>                                                                                                                                                                                    | <p>Please refer to the Traffic and Transport Assessment by Waterman Moylan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p><b>SMT33 Design Manual for Urban Roads and Streets</b><br/>To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.</p>                                                                        | <p>A DMURS alignment statement has been provided as part of Waterman Moylan's Engineering Statement (section 5.7) included with this application.</p> <p>The proposed development achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. Permeability for pedestrians and cyclists is prioritised throughout the scheme with pathways through the public open spaces.</p> <p>A single vehicular access in and out is provided with a low traffic speed environment secured. The cars are restricted at the main entrance to ensure a predominantly car free environment.</p> |
| <p><b>SMT34 Street and Road Design</b><br/>To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.</p>                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## Chapter 9: Sustainable Environmental Infrastructure and Flood Risk

| Policy                                                                                                                                                                                                                                                                                                                                                   | Evaluation of Consistency                                                                                                                                                                                       |
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| <p><b>SI2 Integrating Water Services with Development</b><br/>To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.</p> | <p>A Confirmation of Feasibility is submitted as part of this submission.</p> <p>Please refer to the Engineering Assessment Report for information on the proposed foul and surface water drainage systems.</p> |
| <p><b>SI3 Separation of Foul and Surface Water Drainage Systems</b><br/>To require all new development to provide separate foul and surface water drainage systems.</p>                                                                                                                                                                                  |                                                                                                                                                                                                                 |

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| <p><b>SI4 Drainage Infrastructure Design Standards</b><br/>To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul-sewer specification (where applicable).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>The proposed development complies with these standards. Please see the Waterman Moylan Engineering Planning Report.</p>                                                       |
| <p><b>SI6 Water Conservation</b><br/>To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Best practice water conservation and demand management measures are incorporated into the scheme.</p>                                                                         |
| <p><b>SI14 Strategic Flood Risk Assessment</b><br/>To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.</p>                                                                                                                                                                                                                                                                                                                                                                                      | <p>A Site Specific Floodrisk Assessment prepared by Waterman Moylan is included with the planning application and concludes that the development is not at risk of flooding.</p> |
| <p><b>SI15 Site-Specific Flood Risk Assessment</b><br/>All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> <li>• The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan.</li> <li>• The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual</li> </ul> |                                                                                                                                                                                  |

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| <p>risks including climate change and those associated with existing flood defences. The SSFRA will include site specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA.</p> <ul style="list-style-type: none"> <li>On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them.</li> </ul> |                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>SI21 Managing Surface Water Flood Risk</b><br/>To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Please see the Engineering Report by Waterman Moylan which sets out the flood risk management and SuDS measures throughout the site.</p> <p>The proposed development includes SuDS components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p> <p>It is noted that this proposal will improve the existing situation on this site.</p> |
| <p><b>SI22 Sustainable Drainage Systems</b><br/>To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                |

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| <p>Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design &amp; Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.</p> |                                                                                                                                                                                                                                  |
| <p><b>SI23 Green Blue Roofs</b><br/>To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green &amp; Blue Roof Guide (2021) which is summarised in Appendix 11.</p>                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                  |
| <p><b>SI25 Surface Water Management</b><br/>To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.</p>                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>The proposal has been designed in accordance with the council's surface water management guidance. See Waterman Moylan's Surface Water Management Plan included as part of this submission.</p>                               |
| <p><b>SI26 Taking in Charge of Private Drainage Infrastructure</b><br/>To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be designed to taking in charge standards).</p>                                                                                                                     | <p>The proposed drainage infrastructure will comply with standards set out in Greater Dublin Regional Code of Practice for Drainage Works.</p> <p>The proposed development does not include any lands to be taken in charge.</p> |
| <p><b>SI29 Segregated Storage and Collection of Waste Streams</b><br/>To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).</p>                                                                                                                                                                                                                                                          | <p>See Waterman Moylan Engineering Report for details regarding wastewater management and storage.</p>                                                                                                                           |
| <p><b>SI30 Waste Management in Apartment Schemes</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                  |

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| To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or and any future updated versions of these guidelines produced during the lifetime of this plan). |                                                                                                                                         |
| <b>SI37 Noise Sensitive Development</b><br>To give careful consideration to the location, design and construction of noise sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance.                   | Noted. The proposed scheme is designed with respect to noise mitigation.                                                                |
| <b>SI42 Light Pollution</b><br>To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.                                      | Noted. Please see the Lighting Report provided by McElligotts Consulting Engineers provided with this application.                      |
| <b>SI43 Energy Efficient Lighting</b><br>To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.                             | Noted. Please see the Lighting Report and Energy Statement provided by McElligotts Consulting Engineers provided with this application. |

| <b>Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Objective 1: To promote development with a sense of place and character</b><br>Enhanced density and scale should: <ul style="list-style-type: none"> <li>• respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,</li> <li>• have a positive impact on the local community and environment and contribute to 'healthy placemaking',</li> <li>• create a distinctive design and add to and enhance the quality design of the area,</li> <li>• be appropriately located in highly accessible places of greater activity and land use intensity,</li> </ul> | <p>The text, diagrams and illustrations in the Design Statement prepared by Henry J Lyons and also in the supporting information submitted with this application for planning permission, demonstrate compliance with this objective.</p> <p>By drawing inspiration from the local built and natural heritage, the design respects development constraints and aims to strengthen community ties through thoughtful outdoor spaces and amenities, contributing to a healthy placemaking environment. The proposal's distinctive</p> |

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| <ul style="list-style-type: none"> <li>• have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,</li> <li>• not be monolithic and should have a well-considered design response that avoids long slab blocks,</li> <li>• ensure that set back floors are appropriately scaled and designed.</li> </ul>                                                                                                                                                                                                                                                                                                                            | <p>architectural features and varied building heights create visual interest without overwhelming the area, allowing for an appropriate transition in scale that blends seamlessly with adjacent structures.</p> <p>The project prioritises accessibility, situating residences in a vibrant location in close proximity to a number of public transport options, including future planned Bus Connect routes and existing bus routes. The proposal will include a public open space which will provide the opportunity to create a public open space which the wider community can enjoy.</p> <p>The blocks, open spaces, and community uses have been carefully designed and located to minimise any negative impact on the adjacent residential properties.</p> |
| <p><b>Objective 2: To provide appropriate legibility</b><br/>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• make a positive contribution to legibility in an area in a cohesive manner,</li> <li>• reflect and reinforce the role and function of streets and places and enhance permeability.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               | <p>The proposed development will provide a strong active frontage to the boundary of the subject site, replacing a currently non-active frontage. The increased density will help create a sense of enclosure and sense of place for pedestrians in this area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Objective 3: To provide appropriate continuity and enclosure of streets and spaces</b><br/>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• enhance the urban design context for public spaces and key thoroughfares,</li> <li>• provide appropriate level of enclosure to streets and spaces,</li> <li>• not produce canyons of excessive scale and overbearing of streets and spaces,</li> <li>• generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,</li> <li>• provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.</li> </ul> | <p>The proposed development will provide a strong active frontage to the south, west and east boundaries. This will provide a good sense of enclosure to the proposed public open space.</p> <p>The routes through the site will all be overlooked by the proposed and existing apartment blocks. This will ensure adequate passive surveillance is provided to the public realm.</p> <p>The heights and streets provide an appropriate street width to building height maintaining an appropriate ratio.</p> <p>The development avoids the creation of towering canyons that overwhelm pedestrian experiences, instead fostering a sense of human scale. The design incorporates varied facade treatments and strategically placed</p>                            |

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| <p><b>Objective 4: To provide well connected, high quality and active public and communal spaces</b></p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,</li> <li>• be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,</li> <li>• ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,</li> <li>• ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,</li> <li>• ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,</li> <li>• provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.</li> </ul> | <p>The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport with a reduced car parking ratio. Cycling parking facilities are also located within the site.</p> <p>The blocks have been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties.</p> <p>The spaces and streets have all been designed to be people friendly and accessible.</p>                                          |
| <p><b>Objective 5: To provide high quality, attractive and useable private spaces</b></p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• not compromise the provision of high quality private outdoor space,</li> <li>• ensure that private space is usable, safe, accessible and inviting,</li> <li>• ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,</li> <li>• assess the microclimatic effects to mitigate and avoid negative impacts,</li> <li>• retain reasonable levels of overlooking and privacy in residential and mixed use development.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>There is a high quality of public, communal and private open spaces provided as shown on the Landscape Masterplan prepared by Park Hood Landscape Architects. All these spaces are safe, accessible, and inviting.</p> <p>The proposed development has been designed to ensure passive surveillance is provided to the public spaces and communal open space while also ensuring a high level of privacy is maintained for the proposed units by using the blocks orientation and layout, buffering and screening, balcony design and height and building setbacks.</p> |

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| <p><b>Objective 6: To promote mix of use and diversity of activities</b></p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,</li> <li>• contribute positively to the formation of a ‘sustainable urban neighbourhood’,</li> <li>• include a mix of building and dwelling typologies in the neighbourhood,</li> <li>• provide for residential development, with a range of housing typologies suited to different stages of the life cycle.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>The subject site is located within a short walking distance of a range of amenities such as retail, restaurants, public houses and employment hubs. Therefore, it was not considered appropriate to provide mixed uses on the subject site.</p> <p>The proposed development will provide further residential units in this existing area which will support the range of facilities and amenities in the area by increasing the local population, generating additional demand for facilities and amenities in the area and provide housing for people to live.</p> <p>The proposed mix of one, two and three bed apartments will improve the housing supply quality in the area and provide different options for people at different stages of the life cycle.</p>                        |
| <p><b>Objective 7: To ensure high quality and environmentally sustainable buildings</b></p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16,</li> <li>• not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,</li> <li>• ensure a degree of physical building adaptability as well as internal flexibility in design and layout,</li> <li>• ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,</li> <li>• maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,</li> <li>• be constructed of the highest quality materials and robust construction methodologies,</li> <li>• incorporate appropriate sustainable technologies, be energy efficient and climate resilient,</li> <li>• apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not</li> </ul> | <p>The architectural drawings, schedules and Design Statement prepared by Henry J Lyons demonstrate that the proposed development has been modulated and oriented to maximise access to natural daylight, ventilation, privacy and views to minimise overshadowing and loss of light.</p> <p>The Architectural Elevations demonstrate that any plant shown at roof level is minimal in scale.</p> <p>The design and layout ensures that 38% of units are dual aspect.</p> <p>Please refer to the Architectural drawings and Design Statement prepared by Henry J Lyons for further details on the materials proposed.</p> <p>Please refer to the Flood Risk Assessment and Engineering Assessment Report prepared by Waterman Moylan for details on SuDS solutions within the development.</p> |

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| <p>possible in the context of a particular site (See Appendix 16),</p> <ul style="list-style-type: none"> <li>• incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place – see Appendix 13,</li> <li>• include a flood risk assessment - see SFRA Volume 7.</li> <li>• include an assessment of embodied energy impacts – see Section 15.7.1</li> </ul>                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><b>Objective 8: To secure sustainable density, intensity at locations of high accessibility</b></p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>• be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,</li> <li>• look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.</li> </ul> | <p>The subject site is well connected to the wider area with high quality, high frequency bus routes serving Beaumont Road and Swords Road. The frequency, capacity and destinations is set out in the TTA submitted with this application.</p> <p>The layout has been designed to provide the optimum layout for access and parking while providing a high-quality scheme that prioritises pedestrians and creates a human scaled place.</p> |
| <p><b>Objective 10: To ensure appropriate management and maintenance</b></p> <p>Enhanced density and scale should</p> <ul style="list-style-type: none"> <li>• Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc</li> </ul>                                                                                                                                                                                                                     | <p>A Building Life Cycle Report is provided by Henry J Lyons and various Management Plans have been provided by the relevant parties regarding landscape, engineering, waste etc.</p>                                                                                                                                                                                                                                                         |

| <b>Appendix 5 Transport and Mobility: Technical Requirements</b>                                                                                                                                  |                                                                                                                                       |
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| The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible. | The proposal has been designed to ensure pedestrian permeability within the site.                                                     |
| A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network.                                        | A Road Safety Audit has been prepared by Bruton Consulting Engineers as part of this submission.                                      |
| All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements.                                                     | Please see the Traffic and Transport Assessment by Waterman Moylan and the Road Safety Audit provided by Burton Consulting Engineers. |
| All vehicular access shall be considered, including private car, service, delivery and emergency vehicles, in addition to applicable vehicular access requirements.                               |                                                                                                                                       |
| Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network.                                                                | Set down and turning areas for service vehicles are all provided within the site.                                                     |

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| All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.                                                                                                                                                                                                                                                                                                                                                              | A DMURS Compliance Statement has been included within Waterman Moylan's Engineering Statement under Section 5.7 'DMURS'.                                                                                                                                                                                                                                                                                                         |
| Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.                                                | A Road Safety and Quality Audit has been provided by Burton Consulting Engineers.                                                                                                                                                                                                                                                                                                                                                |
| Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/ reduced provision of car parking to serve a development. | See Waterman Moylan's Mobility Management Plan which includes detail as to how residents travel needs will be assessed.<br><i>"Within the first four months of appointment, the Mobility Management Coordinator shall arrange for a residents' travel survey to be carried out. This can be achieved by means of self-completion questionnaires, which will help to identify travel requirements and set targets and needs."</i> |
| The servicing requirements for any development should be established early in the preplanning process.                                                                                                                                                                                                                                                                                                                                                                       | Please see the pack by Waterman Moylan.                                                                                                                                                                                                                                                                                                                                                                                          |
| Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| For residential developments, details of access for service vehicles shall be considered at an early stage in the design process.                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated.                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.                                                                                                                                                                                                                          | Please see the site layout indicating the service layout and drop off areas.                                                                                                                                                                                                                                                                                                                                                     |
| For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information: <ul style="list-style-type: none"> <li>• Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles;</li> <li>• Confirm the number, type and frequency of service vehicles envisaged for the development and detail</li> </ul>      |                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| the locations from which servicing will occur and how it will be managed;<br><ul style="list-style-type: none"> <li>• Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site.</li> </ul>                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                              |
| Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined.                                                                                                                                                                                                                                                                                                                                    | The site is not immediately adjacent to a Luas line.                                                                                                                                                                                                                                                         |
| Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time                                                                                                                                                                                                                                                                                                                                                            | Please see Waterman Moylan's Parking Management Plan. This addresses items relating to car parking and car parking management.                                                                                                                                                                               |
| Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements.                                                                                                                                                                                                                                                                                                                                                                                                                                | Car parking will not be sold with unit but will be assigned and managed separately.                                                                                                                                                                                                                          |
| A management scheme for any visitor car parking shall also put in place.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Visitors will be discouraged from arriving by car.                                                                                                                                                                                                                                                           |
| Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.                                                                                                                                                                                                                                                                                                                                                 | N/A                                                                                                                                                                                                                                                                                                          |
| The maximum standards for car parking provision are set out in Table 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Table 2 sets a maximum requirement but encourages reduced car parking provision. In line with the strategy and reflecting the sites location in an accessible location it is appropriate to provide a reduced parking ratio of 0.4. The rationale for this is set out in detail in the Waterman Moylan Pack. |
| Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed). |                                                                                                                                                                                                                                                                                                              |
| Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully | <p>The bicycle stores are fully and easily accessible. The Architect's Design Rationale includes details on the location and accessibility of the bike stores.</p> <p>All the bikes stores and spaces are provided at ground level.</p>                                                                      |

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| accessible bicycle parking and is discouraged by Dublin City Council.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                    |
| Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated. | There are 200 no. bike spaces including cargo bike spaces provided throughout the development in a variety of locations easily accessible to each apartment block and each of which are accessible through a separate door. This creates a natural and logical segregation of the bicycle storage. |
| All new developments are required to fully integrate cycle facilities into the design and operation of the schemes, in accordance with Table 1.                                                                                                                                                                                                                                                                                                                                                                                       | This proposed development provides 150 no. resident bicycle parking spaces and 50 no. visitor bicycle parking spaces in accordance with the Development Plan standards.                                                                                                                            |
| Cycle parking for residential apartment units shall be provided at a rate of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units. Relaxations of this standard may be considered in certain instances where the applicant can justify the proposed quantum having regard to location, quality of facilities, flexibility for future enhancement / enlargement and availability of alternative transport facilities.                                                            |                                                                                                                                                                                                                                                                                                    |
| Secure bicycle parking stands shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such cycle stands shall be within 25 m of a destination for short-term parking (shops) and within 50 m for long-term parking (school, college, office). All long-term (more than three hours) cycle stands shall be protected from the weather. Cyclists shall be able to secure both frame and wheels to the cycle parking stand.                                                            | The cycle parking will be facilitated by indoor internal residential bicycle storage areas at Ground Floor Level in the service/ ancillary area of the blocks.                                                                                                                                     |
| All on-street cycle stands shall be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism                                                                                                                                                                                                                                                                                                                                                                                  | The on-street short term bike parking is also provided and are designed to meet their basic function of preventing theft of vandalism.                                                                                                                                                             |
| Off-street storage/parking facilities shall provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision                                                                                                                                                                                                                                                                                                                                                               | The secure long term bike parking spaces will be easily accessible and will be lit appropriately to ensure a strong sense of safety and security.                                                                                                                                                  |
| Where high density cycle parking is provided in a secure location, stacked/tiered cycle parking may be acceptable provided it is easily used and secure.                                                                                                                                                                                                                                                                                                                                                                              | The bike stores includes double-stacked bike parking which will be easily accessible.                                                                                                                                                                                                              |
| Planning applications shall clearly demonstrate cycle parking capacity and user accessibility                                                                                                                                                                                                                                                                                                                                                                                                                                         | Bike parking details are clearly outlined in the Park Hood Landscape Architect's drawings.                                                                                                                                                                                                         |
| A departure from the standards set out in Table 1 may be acceptable in limited circumstances on a case by case basis at the discretion of Dublin City Council. The applicant must fully engage with Dublin                                                                                                                                                                                                                                                                                                                            | The proposal aligns with the standards set out in the Table 1.                                                                                                                                                                                                                                     |

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| City Council at pre-application stage to ascertain any deviations from the above standards                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Table 2 specifies the requisite level of on-site parking to be provided for residents, staff and visitors for various types of development. These car parking standards shall be generally regarded as the maximum parking provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The subject site is located in parking zone 2. Table 2 requires a maximum of 1 spaces per unit. Given the maximum requirement, and its location has a High Public Transport Accessibility site/ noted, it is deemed appropriate to provide 40 car parking spaces (excluding co-car and disabled space) at a ratio of 0.4 units per hectare.                                                                                     |
| A relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | This car parking provision is considered appropriate for this highly accessible location.                                                                                                                                                                                                                                                                                                                                       |
| Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria: <ul style="list-style-type: none"> <li>• Locational suitability and advantages of the site.</li> <li>• Proximity to High Frequency Public Transport services (10 minutes' walk).</li> <li>• Walking and cycling accessibility/permeability and any improvement to same.</li> <li>• The range of services and sources of employment available within walking distance of the development.</li> <li>• Availability of shared mobility.</li> <li>• Impact on the amenities of surrounding properties or areas including overspill parking.</li> <li>• Impact on traffic safety including obstruction of other road users.</li> <li>• Robustness of Mobility Management Plan to support the development.</li> </ul> | <p>The subject site is highly accessible and is located within the existing inner suburban area of Dublin 9 with a range of facilities within a short distance.</p> <p>The proposed development is located within a 500m walk of the Swords Bus Corridor which is served by a high frequency service. This road also has multiple other routes, and the site is therefore considered to be well served by public transport.</p> |
| At least 5% car parking spaces shall be designated accessible car parking spaces.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2 accessible car parking spaces are provided.                                                                                                                                                                                                                                                                                                                                                                                   |
| Proposals should indicate how the design aims to control surface water runoff in a sustainable fashion through the use of permeable or porous surfaces such as gravel and green areas etc. rather than excessive hard surfacing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The proposal incorporates SUDs features including blue roofs and permeable paving.                                                                                                                                                                                                                                                                                                                                              |
| In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 22 No. EV car parking spaces (50%) will be provided within the site, with ducting for future EV infrastructure installed at the remaining residential car parking spaces. EV charging points have been designed so as not to impact proposed internal pedestrian footpaths.                                                                                                                                                     |
| New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided. Motorcycle parking areas shall have limited gradients to enable easy manoeuvrability and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | The proposal includes two motorcycle spaces.                                                                                                                                                                                                                                                                                                                                                                                    |

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| parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.                                                                                                                                                                                                          |                                                                                |
| All car club spaces shall be fully equipped with EV infrastructure                                                                                                                                                                                                                                                                                   | N/A                                                                            |
| All roads and footpaths within developments shall be constructed to Taking-in-Charge standards                                                                                                                                                                                                                                                       | All roads and footpaths will be constructed to taking-in-charge standards.     |
| Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application | A Taking in Charge Plan drawing has been provided by Henry J Lyons Architects. |

| Appendix 5 Table 1 Bicycle Parking Standards for Various Land Uses     |                  |                    |                |
|------------------------------------------------------------------------|------------------|--------------------|----------------|
| Land Use                                                               | Long Term        | Short Stay         |                |
| Residential Apartment                                                  | 1 per bedroom    | 1 per 2 apartments |                |
| Residential Dwelling                                                   | 1 per unit       | 1 per 5 dwellings  |                |
| Appendix 5 Table 2 Maximum Car Parking Standards for Various Land Uses |                  |                    |                |
| Land Use                                                               | Zone 1           | Zone 2             | Zone 3         |
| Houses, Apartments/Duplexes                                            | 0.5 per dwelling | 1 per dwelling     | 1 per dwelling |

As demonstrated by the above statements of compliance, this proposed development is fully in accordance with the National, Regional and Local Planning Policies.

## 7. Conclusion

The proposed development represents an attractive residential development in an established residential, built up, highly accessible and well serviced location within Dublin City Centre. The development will provide for an effective and efficient use of these serviced lands.

The planning policy review within this report demonstrates that the proposed development accords in principle with national and regional planning objectives as directed under the NPF. These statements demonstrated compliance of the proposed development with the following:

- *National Planning Framework First Revision (2025) ("NPFFR");*
- *Climate Action Plan (2025) ("CAP 2025");*
- *Regional Spatial and Economic Strategy 2019- 2031 ("RSES");*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018) ("Building Height Guidelines 2018");*
- *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) ("Compact Settlement Guidelines 2024");*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2022) ("Apartment Guidelines 2025");*
- *Design Manual for Urban Roads and Streets (2019) ("DMURS");*
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) ("Planning System and Flood Risk Guidelines 2009");*
- *Guidelines For Planning Authorities on Childcare Facilities (2001)*
- *Dublin City Development Plan 2022-2028 ("DCDP")*

The proposed development is in compliance with the policies and provisions of the area including the land use zoning, density, design standards for residential schemes, streets, parking and open spaces. The proposed development will also bring significant benefits to the area, in particular the provision of new public open space and a better mix of housing types and unit sizes to the area. The proposal addresses all the previous reasons for refusal.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.