



**THORNTON O'CONNOR**  
TOWN PLANNING

# Planning Report and Statement of Consistency

## Planning Report and Statement of Consistency

Prepared in Respect of a Mixed-Use Development  
Comprising 487 No. Residential Units and a  
Neighbourhood Centre

At Kilternan Village, Dublin 18 (2 No. Sites which  
will be Separated by the Future Glenamuck  
Distributor Link Road [GLDR])

Prepared on Behalf of Liscove Limited

August 2024

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Planning Department  
Dún Laoghaire – Rathdown County Council  
County Hall  
Marine Road  
Dún Laoghaire  
Co. Dublin

Friday, 2<sup>nd</sup> August 2024

Dear Sir/Madam,

**RE: LARGE-SCALE RESIDENTIAL DEVELOPMENT (“LRD”) PLANNING APPLICATION IN RELATION TO A PROPOSED MIXED-USE DEVELOPMENT COMPRISING 487 NO. RESIDENTIAL UNITS AND A NEIGHBOURHOOD CENTRE AT A C. 14.2 HA. SITE IN KILTERNAN VILLAGE, DUBLIN 18**

## **1.0 INTRODUCTION**

### **1.1 Purpose of this Report**

Liscove Limited<sup>1</sup> have retained Thornton O'Connor Town Planning<sup>2</sup> in association with McCrossan O'Rourke Manning Architects (MCORM)<sup>3</sup>, Roger Mullarkey & Associates<sup>4</sup>, Niall Montgomery & Partners Landscape Architects<sup>5</sup>, AtkinsRéalis<sup>6</sup>, NRB Consulting Engineers<sup>7</sup>, Arborist Associates Limited<sup>8</sup>, 3D Design Bureau<sup>9</sup>, Scott Cawley<sup>10</sup>, Enviroguide Consulting<sup>11</sup>, Sabre Electrical Services Limited<sup>12</sup>, Waterman Moylan Consulting Engineers<sup>13</sup>, Independent Site Management<sup>14</sup>, RSK Ireland Limited<sup>15</sup> and Punch Consulting Engineers<sup>16</sup> to prepare this LRD pre-planning application request for a mixed-use development comprising 487 No. residential units and a Neighbourhood Centre in Kilternan Village, Dublin 18 (2 No. sites which will be separated by the Future Glenamuck Distributer Link Road [GLDR]).

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<sup>2</sup> No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, D14 EA89

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<sup>6</sup> Atkins House, No. 150 Airside Business Park, Swords, Co. Dublin

<sup>7</sup> 1<sup>st</sup> Floor, Apollo Building, Dundrum Road, Dundrum, Dublin 14

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<sup>9</sup> Unit 1, Adelphi House, George's Street Upper, Dún Laoghaire, Dublin, A96 DX47

<sup>10</sup> Nos. 71-73 Rock Road, College House, Rock Road, Blackrock, Dublin, A94 F9X9

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<sup>12</sup> Unit 11 Bellevue Industrial Estate, Finglas, Dublin 11, D11 VN59

<sup>13</sup> Block S, EastPoint Business Park, Alfie Byrne Road, Dublin, D03 H3F4

<sup>14</sup> No. 77 Camden Street Lower, Dublin 2, D02 XE80

<sup>15</sup> Bluebell Business Centre, Old Naas Road, Bluebell, Dublin 12

<sup>16</sup> Catherinestown House, Hazelhatch Road, Newcastle, Co. Dublin, D22 YD52



## 1.2 Description of the Proposed Development

The full description of development is as follows:

*"Liscove Limited intend to apply for permission for a Large-Scale Residential Development on 2 No. sites, measuring c. 14.2 Ha., which will be separated by the future Glenamuck Link Distributor Road (GLDR). The western site principally comprises lands at Wayside, Enniskerry Road and Glenamuck Road, Kilternan, Dublin 18, which include a derelict dwelling known as 'Rockville' and associated derelict outbuildings, Enniskerry Road, Kilternan, Dublin 18, D18 Y199 and the former Kilternan Country Market, Enniskerry Road, Kilternan, Dublin 18, D18 PK09. The western site is generally bounded by the Glenamuck Road to the north; the Sancta Maria property to the north, west and south; a residential development named "Rockville" to the north-east; the Enniskerry Road to the south-west; dwellings to the south; and the future GLDR to the east. The eastern site is generally bound by dwellings to the south; the future GLDR to the west; and greenfield land to the north and east.*

*Road works are proposed to facilitate access to the development from the Enniskerry Road; to the approved Part 8 Enniskerry Road/Glenamuck Road Junction Upgrade Scheme on Glenamuck Road (DLRCC Part 8 Ref. PC/IC/01/17); and to the approved Glenamuck District Roads Scheme (GDRS) (ABP Ref. HA06D.303945) on the Glenamuck Link Distributor Road (GLDR). Drainage and potable water infrastructure is proposed to connect to services on the Glenamuck Road, Enniskerry Road and the GLDR.*

*The Glenamuck Road access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table and the changing of the cycle track to a cycle lane at road level as the cycle facility passes the side road junction. Surface water and foul drainage infrastructure is proposed to connect into the drainage infrastructure to be constructed as part of the Part 8 scheme. Potable water is to be provided from the existing piped infrastructure adjacent to the site along Glenamuck Road. Surface water and foul drainage infrastructure connections for the 'former Country Market' area (north-west of the site) are proposed to connect into the drainage infrastructure at the Enniskerry Road/Glenamuck Road junction.*

*The GLDR 'western' access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of short section of shared path and an uncontrolled shared pedestrian and cyclist crossing across the side road junction on a raised table. The works will also include the provision of a toucan crossing, inclusive of the necessary traffic signal equipment, immediately south of the access point to facilitate pedestrian and cyclist movement across the mainline road. All works at this GLDR access point will include the provision of the necessary tactile paving layouts. Surface water, foul drainage and potable water infrastructure connections are proposed into the drainage infrastructure to be constructed as part of the GDRS scheme.*

*The GLDR 'eastern' access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of short section of shared path and an uncontrolled shared pedestrian and cyclist crossing across the side road junction on a raised table. Potable water, surface water and foul drainage infrastructure connections for the eastern site are proposed into the drainage infrastructure to be constructed as part of the GLDR.*

*On Enniskerry Road, works are proposed to facilitate 3 No. new accesses for the development along with modifications to Enniskerry Road. The 3 No. side road priority access junctions incorporate the provision of an uncontrolled pedestrian crossing across the side road junction on raised tables. The modifications to Enniskerry Road fronting the development (c. 340 metres) includes the narrowing of the carriageway down to c.6.5 metres (i.e. a c.3.25 metres running lane in each direction) from the front of the kerb on the western side of Enniskerry Road. The remaining former carriageway, which varies in width of c. 2 metres, will be reallocated for other road users and will include the introduction of a widened pedestrian footpath and landscaped buffer on the eastern side of the road adjoining the proposed development. On Enniskerry Road at the interface of the proposed Dingle Way and Enniskerry Road, aligning with the proposed location of the community centre/café and existing Our Lady of Wayside Church, works include the continuation of the Dingle Way surface materials across Enniskerry Road to create a raised table to connect these community facilities. The above works are inclusive of all necessary tie-in works such as new kerbs along the eastern side of Enniskerry Road, drainage details, road marking, signage and public lighting. Additionally, the development includes the removal of the existing stone wall and the construction of a new stone wall set back to facilitate the upgrade and realignment of the Enniskerry Road. Potable water is to be provided from the existing piped infrastructure along the Enniskerry Road.*

*At the 'Rockville access point', works are proposed to provide a multi-modal access, including a vehicular connection between the proposed development and the Rockville development (permitted under DLR Reg. Ref. D18A/0566). The new access will require the removal of the existing as-built hammerhead turning area at Rockville to create this new connection. The residual hammerhead area will be landscaped to tie into the adjoining landscape strategy. The above works are inclusive of all necessary tie-in works such as new kerbs, drainage details, road marking, signage, and public lighting.*

*Surface water and foul drainage infrastructure is proposed to connect into and through the existing/permitted Rockville developments (DLR Reg. Refs. D17A/0793, D18A/0566, D20A/0015 and D23A/0580).*

*The development will principally consist of: the demolition of c. 740 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings (c. 573 sq m) and the former Kilternan Country Market (wooden structure) (c. 167 sq m); and the provision of a mixed-use development principally consisting of 487 No. residential units (196 No. houses, 201 No. duplex units and 90 No. apartments) and a Neighbourhood Centre. The western site will comprise 362 No. residential units and the Neighbourhood Centre, which will provide an anchor retail store (c. 1,310 sq m), retail/commercial (c. 3,284 sq m), a restaurant (c. 182 sq m), a creche (c. 691 sq m), café (c. 326 sq m), and a community facility (c. 332 sq m), and the eastern site will comprise 125 No. residential units. The 487 No. residential units will consist of 53 No. 1 bedroom units (35 No. apartments and 18 No. duplexes), 150 No. 2 bedroom units (38 No. houses, 16 No. apartments and 96 No. duplexes), 236 No. 3 bedroom units (110 No. houses, 39 No. apartments and 87 No. duplexes) and 48 No. 4 bedroom units (48 No. houses). The proposed development will range in height from 2 No. to 4 No. storeys (partially over podium/undercroft level in Apartment Blocks 1, 2 and 3 and Duplex Block T and U on the eastern site).*

*The development also provides: a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road; 854 No. car parking*

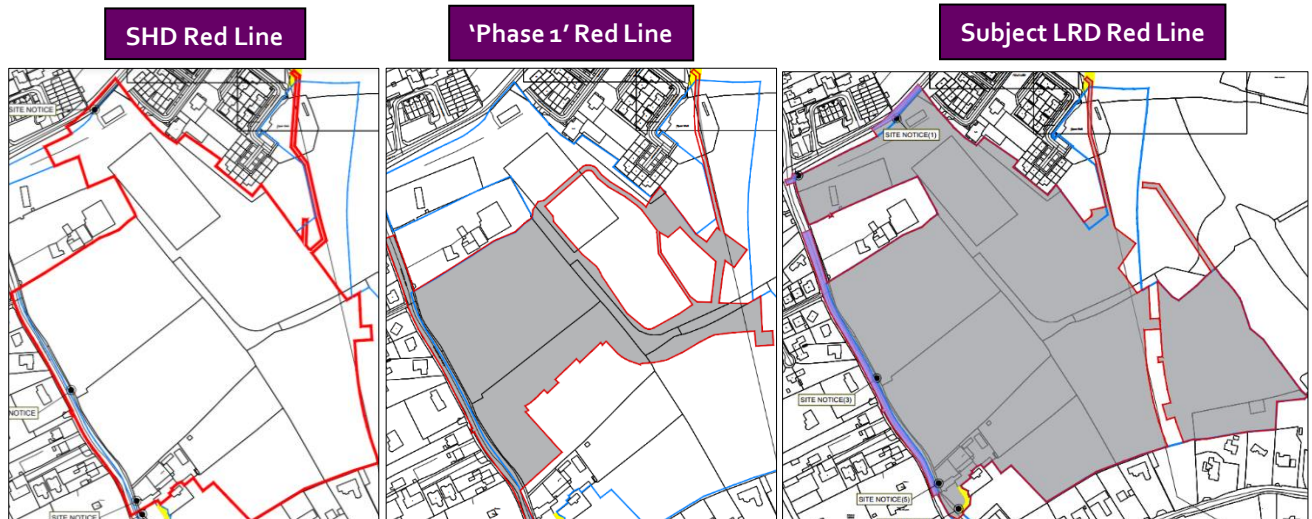
*spaces (125 No. in the undercroft of Apartment Blocks 1, 2 and 3 and Duplex Blocks T and U and 729 No. at surface level) including 28 No. mobility impaired spaces, 100 No. electric vehicle spaces, 2 No. car share spaces, and 4 No. drop-off spaces/loading bays; motorcycle parking; bicycle parking; bin storage; provision of new telecommunications infrastructure at roof level of the Neighbourhood Centre including shrouds, antennas and microwave link dishes (18 No. antennas, all enclosed in 9 No. shrouds and 6 No. transmission dishes, together with all associated equipment); private balconies, terraces and gardens; hard and soft landscaping; totem pole; sedum roofs; solar panels; boundary treatments; lighting; substations; plant; and all other associated site works above and below ground. The proposed development has a gross floor area of c. 60,504 sq m above ground, in addition to an undercroft/basement (c. 4,485 sq m) containing car parking, bike storage, bin storage and plant under Apartment Blocks 1, 2 and 3 and Duplex Blocks T and U on the eastern site.”*

### 1.3 History of the Subject Site

The majority of the subject site formed part of a previous Strategic Housing Development Planning Application (ABP Reg. Ref. ABP-313860-22). Permission was refused by An Bord Pleanála on 27<sup>th</sup> July 2023 for the development predominately comprising 383 No. residential units and a Neighbourhood Centre, for reasons relating to the layout of the Neighbourhood Centre, potential impacts on Our Lady of the Wayside Church (Protected Structure), and the impact of apartment blocks C and D in relation to trees.

The subject Large-Scale Residential Development (LRD) site area, pertains to a slightly larger landbank, predominantly including land to the east of the future Glenamuck Link Distributor Road (GLDR), the Former Country Market site, and in addition a small triangular portion of land to the north-east has been included in order to facilitate a road connection to the neighbouring Rockville development. This subject development seeks to overcome these previous reasons for refusal as detailed in Section 3.0, and in our opinion a high-quality development is proposed on sustainable and suitably zoned lands.

We also note that permission was recently granted for Phase 1 of the LRD site (DLR Reg. Ref. D23A/0616), with this area of land fronting Enniskerry Road (83 No. units and 2,225 sq m of commercial floorspace). The smaller ‘Phase 1 planning application’ allows some development to get started on this important site in the interim and importantly proposes infrastructure and open space beyond the requirements of the Phase 1 site, demonstrating the Applicant’s bona fides in developing the wider lands as soon as possible subject to a grant of permission for this LRD application. The Phase 1 application (and adjacent Rockville Phase 2B scheme – amended under DLR Reg. Ref. D23A/0580) includes a multi-modal connection between the LRD Lands and Rockville, which has been replicated in this subject LRD Planning Application. Please see extracts below which demonstrate the red line boundary for each application:



**Figure 1.1: Site Location Map of the Previous SHD Application, the 'Phase 1 Application' and the Current LRD Planning Application<sup>17</sup>**

**(Source: MCORM Architects, 2022-2024)**

The proposed development subject of this planning application intends to provide critically needed housing units on these sustainably located lands in Kilternan Village. The scheme also includes a Neighbourhood Centre for the wider Kilternan lands and large open spaces, which will hugely benefit the village and future residents.

#### **1.4 Status of the *Kilternan Local Area Plan* ("*Kilternan LAP*")**

We note that the *Kilternan LAP* expired in September 2023 and thus has no statutory basis. Nonetheless, it is our opinion that the scheme principally complies with the design parameters in the expired *Kilternan LAP* as detailed below in this Report.

Importantly, we note that as the *Kilternan LAP* has expired, the phasing strategy in Section 10.6 of the *Kilternan LAP* limiting the quantum of residential units that can be provided no longer applies and in our opinion is no longer a relevant assessment in respect of the subject site.

<sup>17</sup> (Grey Shading on Location Map is Provided to Highlight the Lands)



## 2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

### 2.1 Site Location and Description

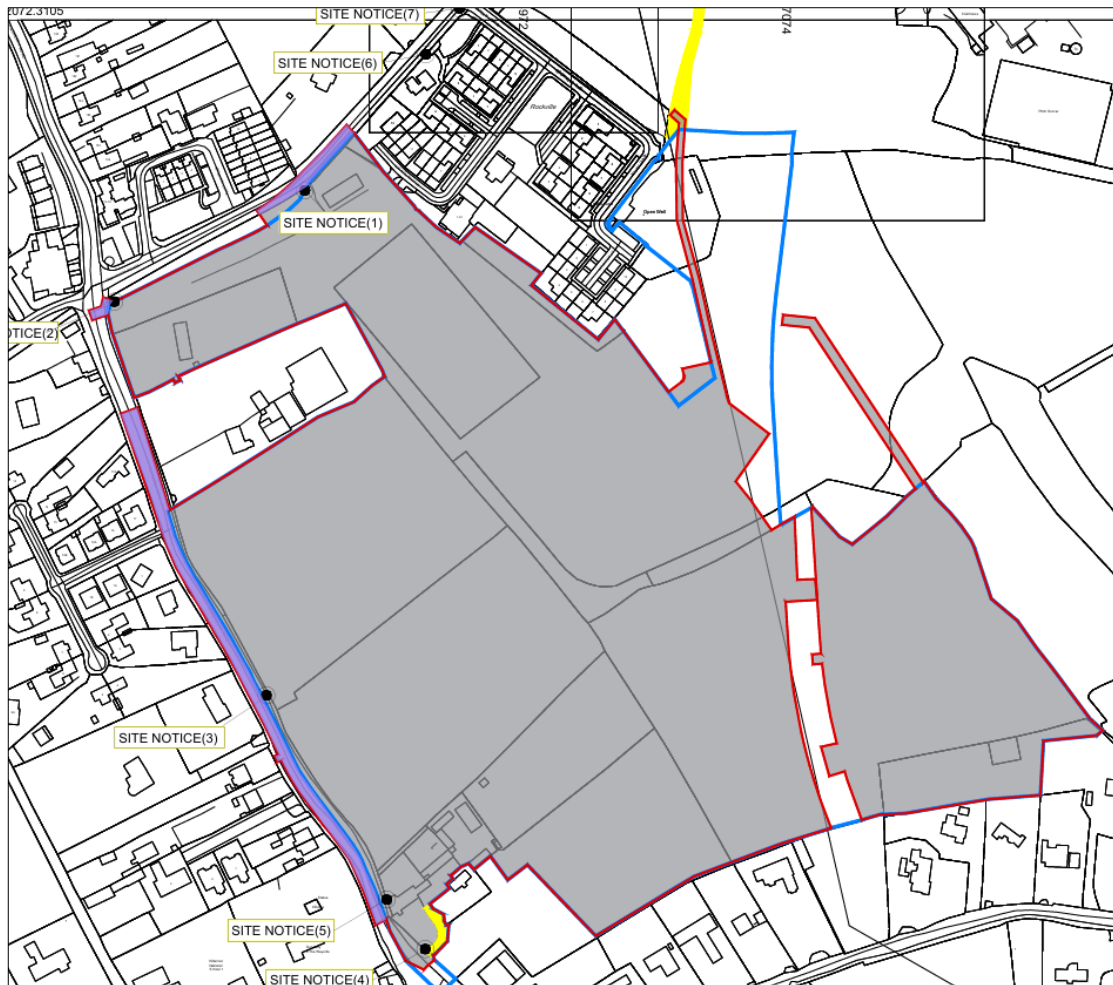
The application site has a total site area of c. 14.2 Ha, and the lands are traversed by the future Glenamuck Link Distributor Road (GLDR), which results in the provision of a 'western site' and an 'eastern site' (see Figure 2.1 below). The lands are principally located to the north-east of the Enniskerry Road and to the southern side of the Glenamuck Road, with part of its frontage directly opposite Our Lady of the Wayside Church, Kiltiernan. The lands are located c. 1.9 km – c. 2.3 km to the south-west of the M50 and Carrickmines Retail Park.



**Figure 2.1: Aerial Photograph of the Site's Location with Site Indicatively Annotated in Red**

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2024)

The Sancta Maria property is located along the north, west and south of part of the western site and a recently constructed residential development named "Rockville" is located to the north-east. As shown in Figure 2.2 below, the red line boundary also extends to the north-east into Rockville and other surroundings lands to incorporate drainage works and a new vehicular connection. For clarity, the red line boundary throughout images in this report will principally relate to the developable site area and doesn't include infrastructure spurs etc.



**Figure 2.2: Site Location Map Demonstrating the Application Lands in Red (and Shaded Grey for Clarity)**

(Source: McCrossan O'Rourke Manning Architects, 2024)

The total site area is 14.2 Ha., the developable site area is 13.5 Ha (excluding the external road/junction and external drainage works) and the net site area is 13.2 Ha. (excluding the external road/junction and external drainage works and internal link road from Enniskerry Road to the GLDR).

## 2.2 Zoning of the Subject Site

The subject site is zoned 'Objective A' and 'Objective NC' in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* ("Development Plan"), where the stated objectives are:

1. *Objective A: To provide residential development and improve residential amenity while protecting the existing residential amenities.*
2. *Objective NC: To protect, provide for and/or improve mixed-use neighbourhood centre facilities.*

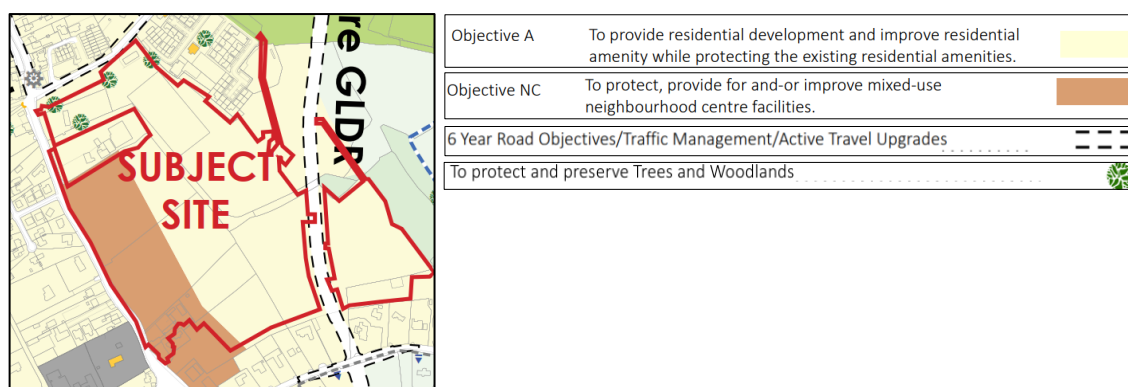


Figure 2.3: Zoning of the Application Site (Indicatively Outlined in Red)

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by MCORM Architects, 2024)

In addition, the lands were located within the *Kilternan-Glenamuck Local Area Plan 2013 - 2019* [which has expired since September 2023] ("*Kilternan LAP*"). Therefore, the *Kilternan LAP* no longer has a statutory basis. Nonetheless, it is our opinion that the scheme predominately complies with design parameters in the expired *Kilternan LAP*, with Development Parcels 20A, 22 and 23A of the *Kilternan LAP* pertaining to the subject lands, which is further discussed in Section 7.0 of this Report.

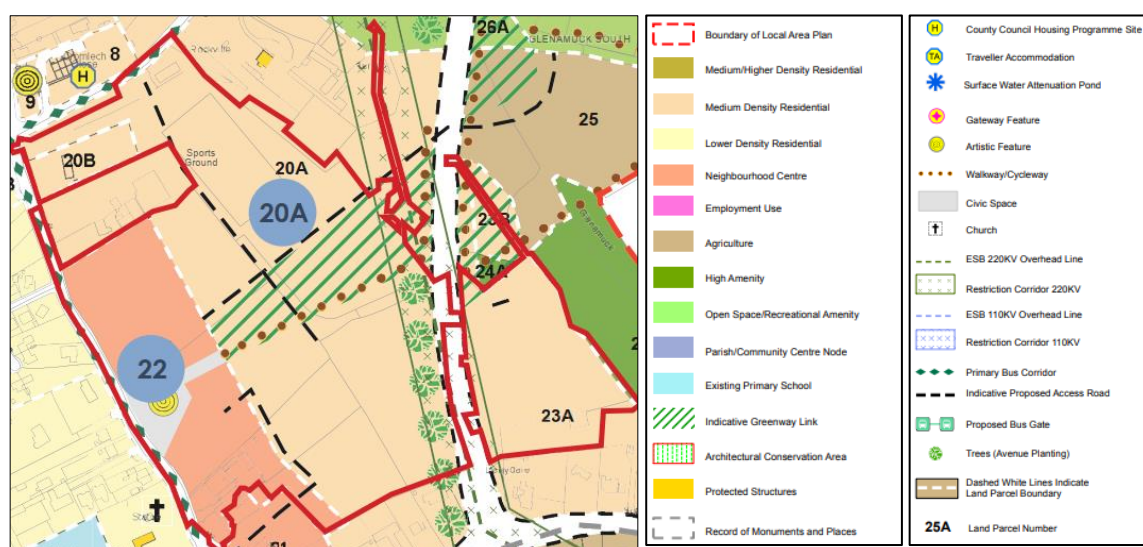


Figure 2.4: Adopted Map from *Kilternan LAP* with Application Site Indicatively Outlined in Red

(Source: *Kilternan LAP*, annotated by MCORM Architects, 2024)

## 2.3 Site Context

The area is serviced by bus route Nos. 44, 63 and 118. The site is also located c.1.9 km-c.2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c.2.3 km – c.2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop.

The site is located in Kilternan Village with access to a pub/restaurant, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan

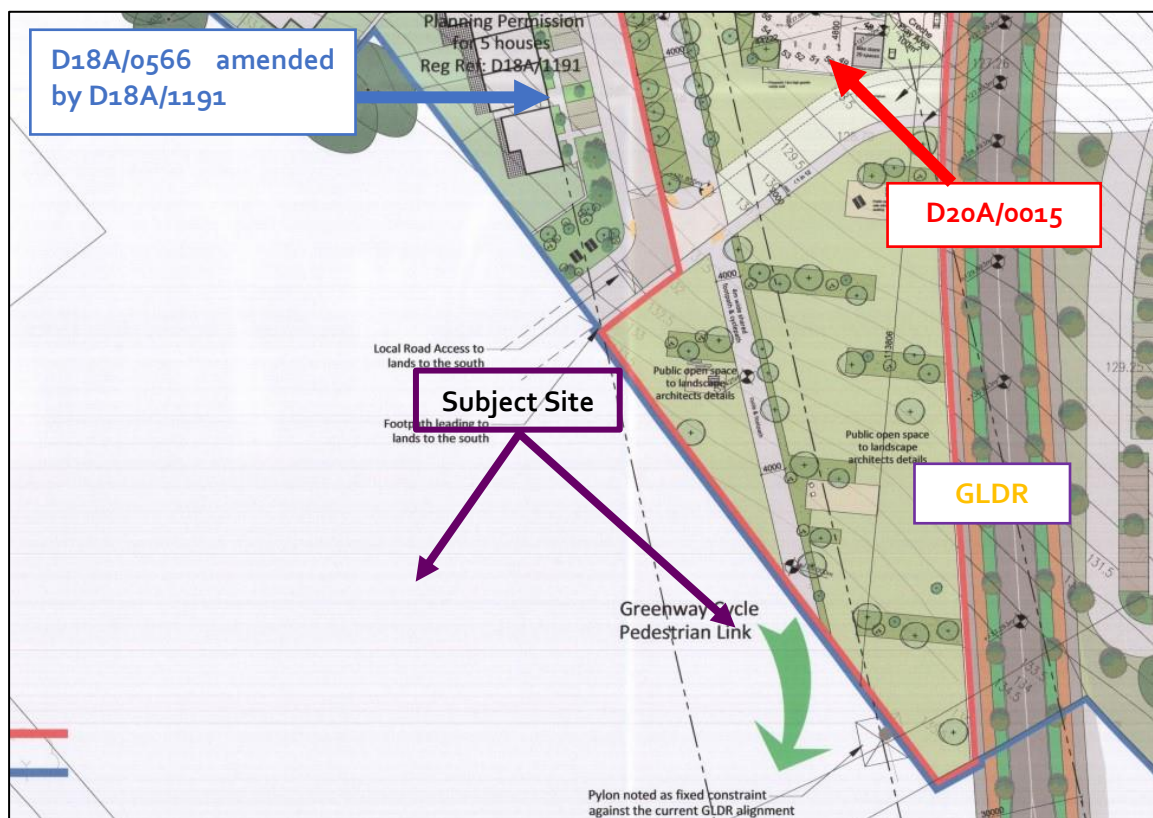


Adult Education Centre as well as religious services in the Village such as Kilternan Parish Church and Our Lady of the Wayside Church. The proposed development includes a Neighbourhood Centre, which will enhance the provision of services for Kilternan.

Immediately adjoining the lands of the subject site to the north-east is a residential development called Rockville. Phase No. 1 was permitted in 2017 (DLRCC Reg. Ref. D17A/0793) which comprised 49 No. dwellings consisting of 37 No. detached semi-detached and terraced 2/3 No. storey houses and 12 No. apartments. This permission was amended under DLRCC Reg. Ref. D19A/0242 to provide an additional 2 No. units.

Phase No. 2A (DLRCC Reg. Ref. D18A/0566 as amended by D18A/1191) of the development was granted permission to provide 5 No. 2.5 storey, 4-bedroom houses, whilst Phase No. 2B was granted permission in September 2020 under DLRCC Reg. Ref. D20A/0015 (ABP Reg. Ref. ABP-306999-20). The second phase (2B) of this development comprised a 4 No. storey apartment block consisting of 56 No. units, a gym facility and a creche.

Subsequent to this permission being secured, the Applicant, Liscove Limited has purchased this neighbouring Phase 2B site. Furthermore, we note that a planning application was lodged by Liscove Limited in September 2023 on the Phase 2B lands, seeking to amend the previous permission of 56 No. units to provide 28 No. residential units (DLRCC Reg. Ref. D23A/0580). This application was granted permission on 24<sup>th</sup> May 2024 with a Final Grant Date of 27<sup>th</sup> June 2024. Work is expected to happen imminently on the implementation of this permission.



**Figure 2.5:** Portion of the Proposed Site Plan Under DLRCC Reg. Ref. D20A/0015 in the Context of the Subject Application Lands

(Source: DLRCC Reg. Ref. D20A/0015 Layout Plan, annotated by Thornton O'Connor Town Planning, 2024)





Figure 2.6: Portion of Rockville Proposed Site Plan (DLRCC Reg. Ref. D23A/0580) in the Context of the Subject Lands<sup>18</sup>

(Source: DLRCC Reg. Ref. D23A/0580 Layout Plan, annotated by Thornton O'Connor Town Planning, 2024)

<sup>18</sup> Multi-modal connection that was recently permitted in Rockville Phase 2B to the GLDR has been replicated in this LRD Application for completeness.

### 2.3.1 Glenamuck District Roads Scheme (GDRS)

The Glenamuck District Roads Scheme (GDRS) relates to road proposals servicing the Carrickmines area between the Enniskerry Road and the Glenamuck Road. The scheme consists of The Glenamuck District Distributor Road (GDDR) and the Glenamuck Link Distributor Road (GLDR), which will connect the existing Enniskerry Road and the Glenamuck Road with the new link distributor road, connecting to the Ballycorus Road to the south.

The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18<sup>th</sup> December 2019 (ABP Reg. Ref. HA06D.303945). The Applicant has been working closely with DLRCC in relation to the road works and we have been advised that the contractors have now moved on site and have commenced works. DLRCC have issued a programme of works with completion dates for each section. In relation to the expected completion date for the GLDR, DLRCC/Contractors are advising completion in Q1 2026. We can confirm that the applicants have been in discussions with DLRCC Roads design office and their design team during the various stages of design and can confirm that the application and interfaces as designed are in line with the design of the GLDR Road scheme.

The GLDR will run through the subject lands, which has thus resulted in the application site being provided in 2 No. land parcels. The subject development proposes vehicular access points to the future GLDR and a pedestrian/cycle route through the Dingle Way from Enniskerry Road (western lands) to the future GLDR and subsequently into the eastern lands.

### 2.4 Site Accessibility

The subject site is proximate to several important transport facilities in the vicinity. The Ballyogan Wood LUAS stop is located c. 2.3 km-c. 2.7 km to the north-east (c. 26 – c. 31 minutes walking distance). Access to the M50 Carrickmines (Exit 15) is located c. 1.9 km – c. 2.2 km from the subject site, a c. 3-4 No. minute car journey away.

Bus route Nos. 44, 63 and 118 serve the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kilternan within the Bus Connects scheme will serve Kilternan Village and offer transport links to Dublin City Centre and other suburbs and employment locations and education facilities in the Greater Dublin Area such as University College Dublin. Figure 2.7 below illustrates existing and proposed transport access in the vicinity which supports the proposed development.





**Figure 2.7: Surrounding Road and Public Transport Infrastructure within a c. 2.5 km Radius of the Subject Lands**

**(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2024)**

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines (Exit 15) and the proposed GDRS scheme, which will remove a large amount of through traffic from the village, this makes Kilternan Village a hub for activity and increases the area's potential to becoming a model suburban village. Planning permission has recently been granted for various developments in the area, which are outlined in Section 3.0. The proposed development will contribute towards delivering compact growth, especially as some of the recently granted developments in Kilternan are located further from the village core.

## 3.0 PLANNING HISTORY

### 3.1 Overview of Relevant Planning History at the Subject Site

According to the Dun Laoghaire-Rathdown County Council Online Planning Database, various parts of the lands have been subject to 3 No. planning applications outlined below:

#### 3.1.1 Recent SHD on Lands Including the Subject Site

As noted in Section 1.3, the majority of the site formed part of a previous Strategic Housing Development Planning Application (ABP Reg. Ref. ABP-313860-22). Permission was refused by An Bord Pleanála on 27<sup>th</sup> July 2023 for the development principally comprising 383 No. residential units and a Neighbourhood Centre.

<b>Reg. Ref:</b>	<b>ABP-313860-22</b>
<b>Location:</b>	Lands at Wayside (including a derelict dwelling known as 'Rockville' and associated derelict outbuildings), Enniskerry Road and Glenamuck Road, Kilternan, Dublin 18
<b>Application Date:</b>	22 <sup>nd</sup> June 2022
<b>Development Description:</b>	<p>Liscove Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 10.8 Ha site at lands at Wayside, Enniskerry Road and Glenamuck Road, Kilternan, Dublin 18, which include a derelict dwelling known as 'Rockville' and associated derelict outbuildings, Enniskerry Road, Kilternan, Dublin 18, D18 Y199. The site is generally bounded by the Glenamuck Road to the north; Kilternan Country Market and the Sancta Maria property to the north and west; a recently constructed residential development named "Rockville" to the north-east; the Enniskerry Road to the south-west; dwellings to the south; and lands that will facilitate the future Glenamuck Link Distributor Road to the east.</p> <p>Road works are also proposed to facilitate access to the development from the Enniskerry Road; to the approved Part 8 Enniskerry Road/Glenamuck Road Junction Upgrade Scheme on Glenamuck Road (DLRCC Part 8 Ref PC/IC/01/17); and to the approved Glenamuck District Roads Scheme (GDRS) (ABP Ref:HA06D.303945) on the Glenamuck Link Distributor Road (GLDR). Drainage and water works are also proposed to connect to services on the Glenamuck Road and Enniskerry Road.</p> <p>The development will principally consist of: the demolition of c. 573.2 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings; and the provision of a mixed use development consisting of 383 No. residential units (165 No. houses, 118 No. duplex units and 100 No. apartments) and a Neighbourhood Centre, which will provide a creche (439 sq m), office (317 sq m), medical (147 sq m), retail (857 sq m), convenience retail (431 sq m) and a community facility (321 sq m). The 383 No. residential units will consist of 27 No. 1 bedroom units (19 No. apartments and 8 No. duplexes), 128 No. 2 bedroom units (78 No. apartments</p>

	<p>and 50 No. duplexes), 171 No. 3 bedroom units (108 No. houses, 3 No. apartments and 60 No. duplexes) and 57 No. 4 bedroom units (57 No. houses). The proposed development will range in height from 2 No. to 5 No. storeys (including podium/undercroft level in Apartment Blocks C and D and in the Neighbourhood Centre).</p> <p>The development also provides: pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" development to the north-east and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road; 678 No. car parking spaces (110 No. in the undercroft of Blocks C and D and the Neighbourhood Centre and 568 No. at surface level) including 16 No. mobility impaired spaces, 73 No. electric vehicle spaces, 1 No. car share space, 4 No. drop-off spaces/loading bays; motorcycle parking; bicycle parking; bin storage; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level of the Neighbourhood Centre including shrouds, antennas and microwave link dishes (18 No. antennas and 6 No. transmission dishes, all enclosed in 9 No. shrouds together with all associated equipment); private balconies, terraces and gardens; hard and soft landscaping; sedum roofs; solar panels; boundary treatments; lighting; substations; plant; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 43,120 sq m in addition to undercroft levels (under Apartment Blocks C and D measuring c. 1,347 sq m and under the Neighbourhood Centre measuring c. 2,183 sq m, which includes parking spaces, external storage, bin storage, bike storage and plant).</p>
<b>ABP Decision:</b>	Refuse Permission
<b>ABP Decision Date:</b>	27 <sup>th</sup> July 2023

An Bord Pleanála refused permission for the following reasons:

1. *The neighbourhood centre proposed as part of the subject scheme is to be situated on lands subject to an 'NC' zoning objective, which is 'To protect, provide for and or improve mixed-use neighbourhood centre facilities' and with the objective in the Kilternan/Glenamuck Local Area Plan 2013-2023 to accommodate a neighbourhood centre. This aspect of the scheme, by reason of the mix of uses proposed and the extent of non-residential uses proposed, is not deemed capable of satisfying the needs of the current and future population of Kilternan and would result in a dependency on car-based trips to other commercial and leisure centres located at a distance. Furthermore, the proposed design and layout of the neighbourhood centre, which does not correspond with the detailed guidance of the Neighbourhood Framework Plan included as Appendix A of the Kilternan/Glenamuck Local Area Plan 2013-2023, would not succeed in the creation of an active and vibrant high quality public realm capable of maximising footfall towards the neighbourhood centre and would not provide a satisfactory setting for Our Lady of the Wayside Church protected structure Register of Protected structures Number 1802. As such, it is considered that the proposed development would fail to deliver on the objectives of Policy PHP<sub>4</sub> and MFC<sub>1</sub> of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 and also on the specific objectives for Land*



Parcel 22 set out in the Kiltiernan/Glenamuck Local Area Plan 2013-2023. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. Having regard to the detailed design and layout of Blocks C and D, to the proposed removal of mature trees in the north eastern part of the site, to the proximity of Blocks C and D to the northeastern site boundary and to the relative difference in ground levels between the development site and adjacent residential properties at Rockville, it is considered that the development would have significant adverse impacts on residential and visual amenities at Rockville due to overbearing visual impacts and would not be compatible with the objective to protect and preserve trees at this location as indicated in Map 9 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.



Figure 3.1: Proposed SHD Site Plan Under ABP-313860-22

(Source: MCORM Architects, 2022)<sup>19</sup>

<sup>19</sup> Please see Figure 1.1 earlier in the report which compares the red line boundary of both applications.

### 3.1.1.1 Addressing the Reasons for Refusal in this Subject Scheme

#### Reason No. 1 – Neighbourhood Centre Layout and Relationship with Our Lady of the Wayside Church

In response to this refusal reason, the following changes have been made to the layout of the Neighbourhood Centre:

- The layout has been altered to provide retail/commercial space surrounding all 3 No. sides of the Village Green;
- The quantum of retail/commercial floorspace has been significantly increased (from c. 2,512 sq m to c. 6,125 sq m – an increase of 144%), which will ensure there is ample facilities available in the village without the need for a car-based trip;
- Parking has been relocated from the Village Green to the rear of the Neighbourhood Centre block;
- The community centre is now facing Enniskerry Road and the Village Green, which will provide an active frontage; and
- A newly proposed café and plaza area are provided facing Enniskerry Road and opposite the Our Lady of the Wayside Church, which will provide an attractive setting for the Church (Protected Structure) and will ensure that footfall is maximised.





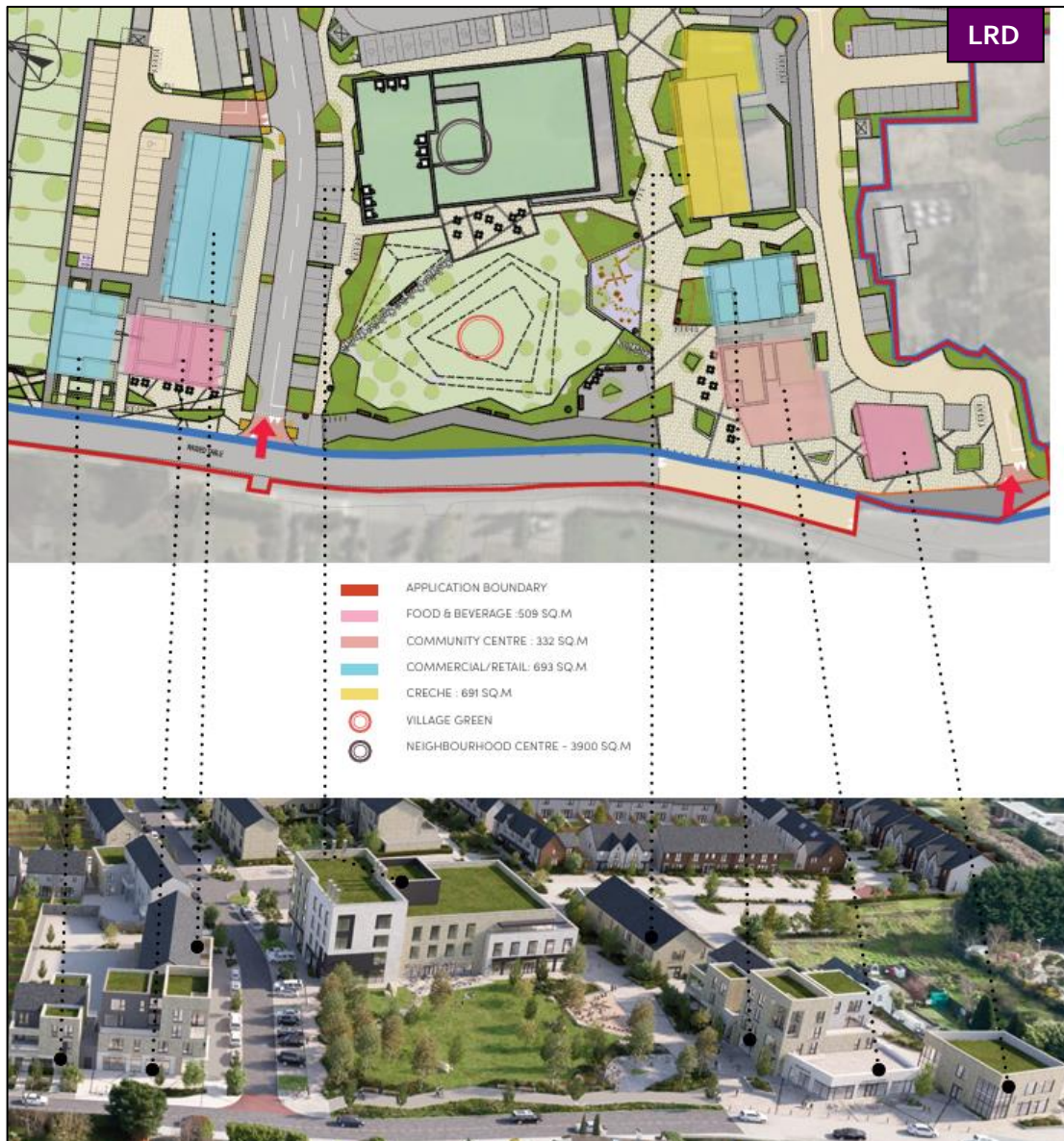


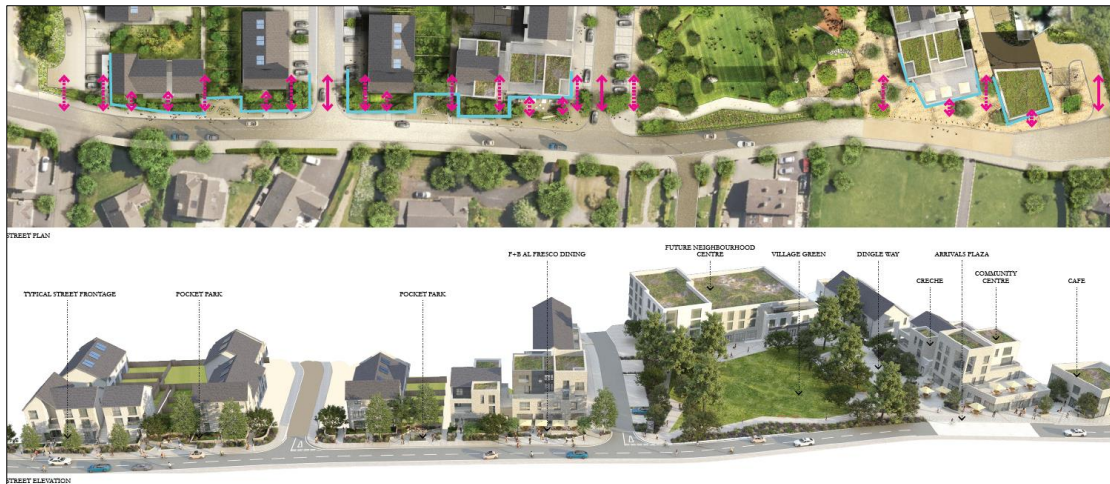
Figure 3.2: Comparison between the Neighbourhood Centre Layouts<sup>20</sup>

(Source: MCORM Architects, 2024)

We note that Phase 1 of the subject LRD Planning Application was recently granted permission by Dún Laoghaire-Rathdown County Council under DLRCC Reg. Ref. D23A/0616, which included the café, creche, community facility, some commercial/retail and a restaurant. For clarity, the only element of the non-residential floorspace that didn't form part of the Phase 1 application is the Neighbourhood Centre 'block' shown above directly adjacent to the Village Green. The permitted Phase 1 development has been replicated within this LRD Planning Application for completeness. Please see image below which demonstrates the granted Phase 1 development ('Future Neighbourhood Centre' forms part of the proposed LRD Application which includes the anchor retail unit):

<sup>20</sup> Non-residential figures are summarised in the image.





**Figure 3.3: Images of the Active Frontage Provided Along Enniskerry Road Granted Under DLRCC Reg. Ref. D23A/0616**

(Source: 'Landscape Design Statement' by NMP Landscape Architects, 2024)

In our opinion and as agreed by the Planning Authority (having regard to the Phase 1 decision), the modifications made to the layout of this portion of the site fronting Enniskerry Road and Our Lady of the Wayside Church, comprehensively addresses this reason for refusal and will ensure that an active and high-quality public realm is provided. In addition, a new vehicular access to the neighbouring Rockville has also been provided further to comments of the Planning Authority and An Bord Pleanála's Inspector (which has also been granted under the Phase 1 development).

### Reason No. 2 – Tree Removal in the North-East Corner of the Subject Site

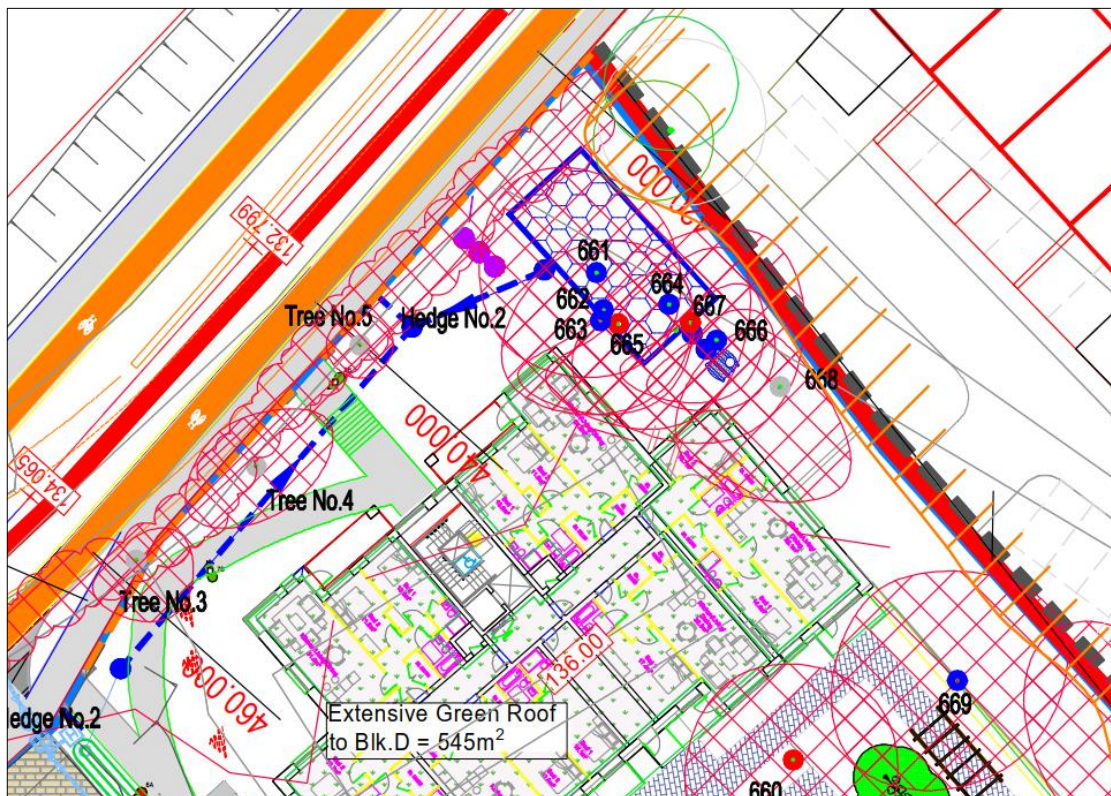
In response to this refusal reason, the previously proposed apartment blocks C and D in the north-east corner have been omitted from the layout and have been replaced by 2 No. duplex blocks, which are 3 No. storeys in height. These blocks have been stepped back from the boundary and thus will negate any potential visual impact on neighbouring properties and will reduce the quantum of trees to be removed by virtue of direct impact from the development. Please see extract below from the 'Arboricultural Assessment' enclosed and prepared by Arborist Associates Limited<sup>21</sup>:

*"In relation to the north-western corner, since the previous SHD application, the condition of some trees in this area in particular the Ash and Elm have deteriorated due to infection by 'Ash Dieback' and 'Dutch Elm Disease' and those most affected have been removed in consultation with Mr. Neil Molloy of DLRCC Parks Department as part of management to address safety to the surrounding properties and road. The boundary hedge and trees within along the 'Glenamuck Road' which is partly within the site red line boundary have also been cut down by others in preparation of road improvement works in this area. As part of this revised site layout in the north west corner of the site area on the boundary with Rockville Woods, changes have been made to the layout to minimize impact on the trees in this area and 3 No. trees that had been identified for removal in the SHD Application have now been retained to help maintain the sylvan character in this area."*

<sup>21</sup> Tree Nos. 661, 664 and 666



(Source: Dwg No. KVL002, Arborist Associates, 2024)



(Source: Arborist Associates, 2022)

### 3.1.2 D23A/0616 – Phase 1 of the Subject LRD Development

As outlined in Section 1.3 and noted above in Section 3.1.1, planning permission has recently been granted for Phase 1 of the subject LRD Planning Application, which has been replicated exactly in the subject LRD Planning Application (83 No. units and 2,225 sq m of commercial floorspace).

The Applicant intends to commence work on Phase 1 imminently.

Please find the application details below:

<b>Reg. Ref:</b>	D23A/0616
<b>Location:</b>	Lands at Wayside, Enniskerry Road, Kiltiernan, Dublin 18
<b>Application Date:</b>	27 <sup>th</sup> September 2023
<b>Development Description:</b>	<p>Permission for development at a 3.9 Ha. site. The site is generally bounded by the Sancta Maria property to the north; greenfield land to the north-east with a recently constructed residential development named "Rockville" further to the north-east; the Enniskerry Road to the south-west; greenfield lands to the south with dwellings further south; and lands that will facilitate the future Glenamuck Link Distributor Road to the east.</p> <p>At the GLDR access point, this will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of short section of shared path and an uncontrolled shared pedestrian and cyclist crossing across the side road junction on a raised table. The works will also include the provision of a toucan crossing, inclusive of the necessary traffic signal equipment, immediately south of the access point to facilitate pedestrian and cyclist movement across the mainline road. All works at the GLDR access point will include the provision of the necessary tactile paving layouts and are provided on an area measuring c. 0.06 Ha. At the Enniskerry Road, works are proposed to facilitate 2 No. new accesses for the development along with modifications to Enniskerry Road. The 2 No. side road priority access junctions incorporate the provision of an uncontrolled pedestrian crossing across the side road junction on a raised table. The modifications to Enniskerry Road fronting the development (circa 340 metres) includes the narrowing of the carriageway down to 6.5 metres (i.e. a 3.25 metres running lane in each direction) from the front of the kerb on western side of Enniskerry Road. The remaining former carriageway, which varies in width of c. 2 metres, will be reallocated for other road users and will include the introduction of a widened pedestrian footpath and landscaped buffer on the eastern side of the road adjoining the proposed development. The above works are inclusive of all necessary tie-in works such as new kerb along eastern side of Enniskerry Road, drainage details, road marking, signage and public lighting. Potable water is to be provided from the existing piped infrastructure along the Enniskerry Road. The interface works on Enniskerry Road measures c. 0.28 Ha. Additionally, the development includes the</p>

	<p>removal of the existing stone wall and the construction of a new stone wall set back on the applicant's lands to facilitate the upgrade and realignment of the Enniskerry Road.</p> <p>Surface water and foul drainage infrastructure is proposed to connect into and through the existing/permitted Rockville developments (DLR Reg. Refs. D17A/0793, D18A/0566 and D20A/0015) on a total area measuring c. 0.5 Ha. The development site area and drainage and roads works areas will provide a total application site area of c. 4.7 Ha.</p> <p>The development will principally consist of: the provision of a mixed use development consisting of 91 No. residential units (72 No. houses and 19 No. duplex units), a creche (405 sq m) and retail/commercial floorspace (356 sq m), which ranges in height from 2 to 4 No. storeys. The 91 No. residential units will consist of 5 No. 1 bedroom units (5 No. duplexes), 18 No. 2 bedroom units (9 No. duplexes and 9 No. houses), 48 No. 3 bedroom units (43 No. houses and 5 No. duplexes) and 20 No. 4 bedroom units (20 No. houses)<sup>22</sup>.</p> <p>The development also provides: pedestrian links from Enniskerry Road and a pedestrian route from Enniskerry Road to the future Glenamuck Link Distributor Road; 178 No. car parking spaces including 2 No. mobility impaired spaces, 10 No. electric vehicle spaces, 1 No. drop-off space/loading bay and 1 No. parent and child space; motorcycle parking; bicycle parking; bin storage; private balconies, terraces and gardens; hard and soft landscaping; sedum roofs; solar panels; boundary treatments; lighting; substation; plant; and all other associated site works above and below ground. The proposed development has a gross floor area of c. 12,120 sq m.</p>
<b>DLR Decision:</b>	Grant Permission subject to 32 No. conditions
<b>Decision Date:</b>	7 <sup>th</sup> June 2024
<b>Final Grant Date:</b>	11 <sup>th</sup> July 2024

<sup>22</sup> Unit mix and non-residential floorspace amended at RFI Stage.



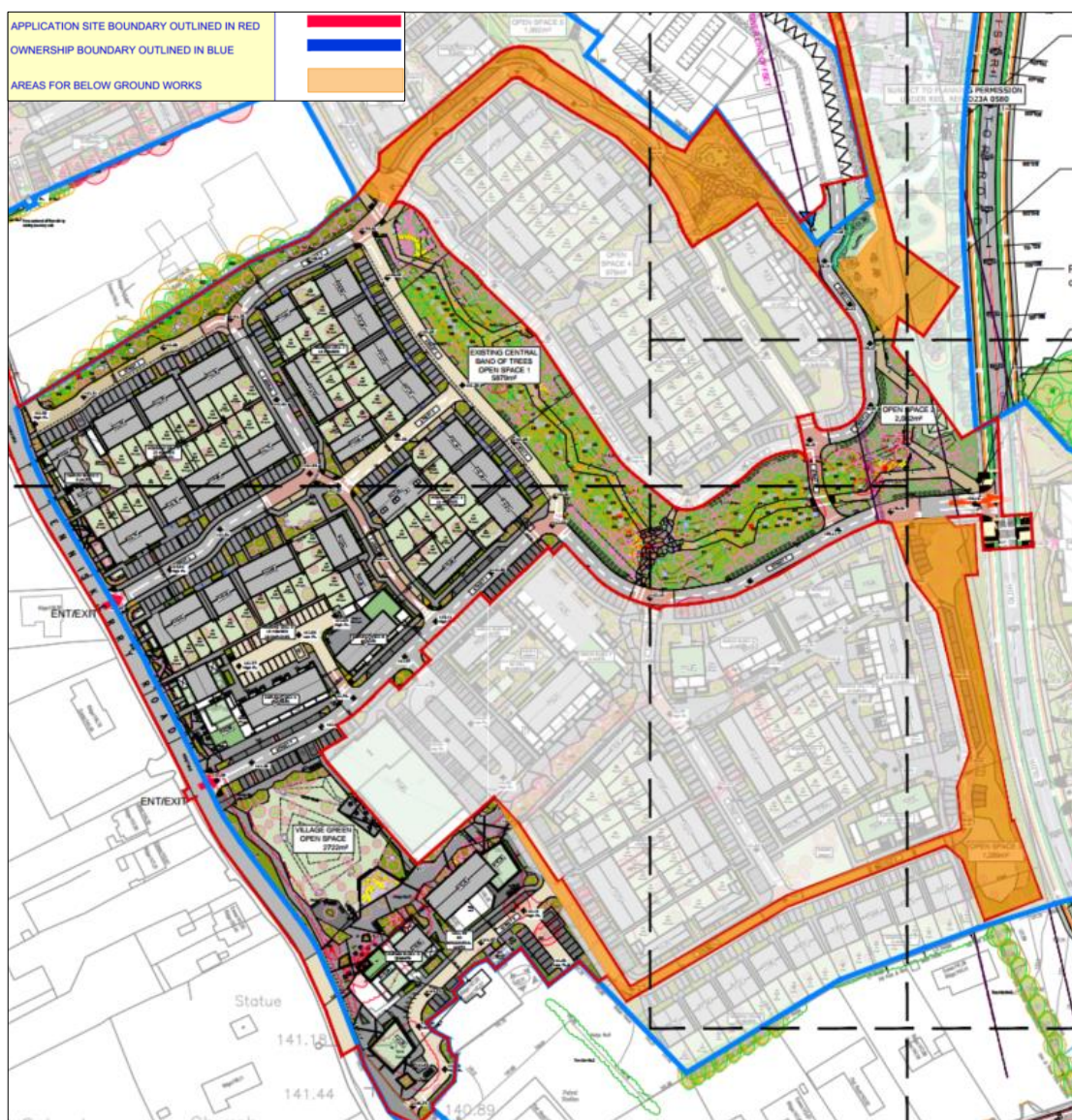


Figure 3.6: Proposed Site Plan Under DLR Reg. Ref. D23A/o616

(Source: MCORM Architects, 2024)<sup>23</sup>

### 3.1.3 DogA/o471 – Development comprising 161 No. Residential Units, 4 No. Retail Units, 10 No. Office Units and 1 No. Creche

Planning permission was previously refused for development on part of the subject site as detailed below:

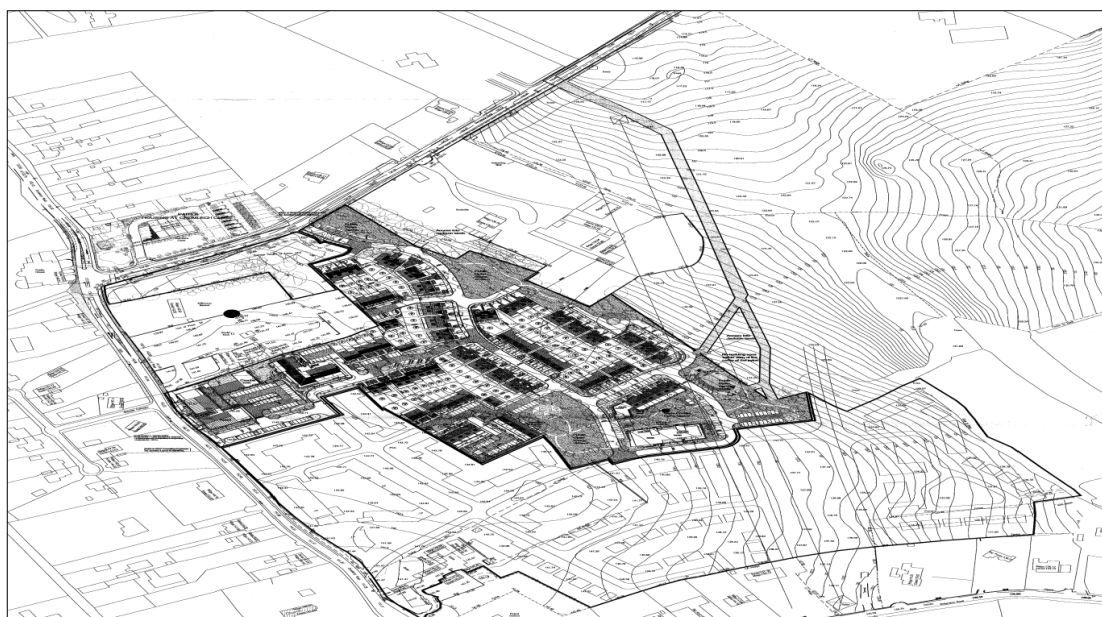
<b>Reg. Ref:</b>	<b>DogA/o471 [PLo6D.23663o]</b>
<b>Location:</b>	Enniskerry Road, Kilternan, Co. Dublin
<b>Application Date:</b>	1 <sup>st</sup> July 2009
<b>Development Description:</b>	Permission for demolition of the existing changing rooms building on site and the construction of a mixed-use scheme comprising <b>161 No. residential units, 4 No. retail units, 10 No. office units and 1 No. creche.</b> The residential element of the

<sup>23</sup> Please see Figure 1.1 earlier in the report which compares the red line boundary of both applications.

	<p>scheme will comprise of <b>88 No. houses; 35 No. apartment units; and 38 No. duplex units</b>. The apartments and duplex units will be provided in <b>4 No. 3 storey</b> and <b>1 No. 4 storey blocks</b>. All apartments provided with balconies and / or terraces.</p> <p>The commercial element of the scheme will be accommodation in <b>2 No. 1-2 and 3 storey blocks</b> and will comprise of <b>4 No. retail units; 10 No. office units</b> and <b>1 No. crèche facility</b>. 1 No. signage display at the entrance to the site at Enniskerry Road.</p> <p>The scheme will be accessed <b>via 2 No. vehicular access points (1 No. off Enniskerry Road to the west and 1 No. off Glenamuck Road to the north)</b>.</p> <p>New vehicular accesses will also be provided to "Rockville" to the north-east of the site and to lands to the south-east of the site via proposed new internal access roads. Provision of a total of <b>369 No. car parking spaces and 80 No. bicycle parking spaces at surface level</b>.</p>
<b>DLR Decision:</b>	Refuse Permission
<b>DLR Decision Date:</b>	30 <sup>th</sup> March 2010
<b>ABP Decision:</b>	Refuse Permission
<b>ABP Decision Date:</b>	5 <sup>th</sup> October 2010

Under DLRCC Reg. Ref. DogA/0471, permission was sought for the development of a mixed-used scheme including 161 No. residential units, 10 No. office units, 4 No. retail units and 1 No. creche. Permission was refused by Dun Laoghaire-Rathdown County Council for 4 No. reasons relating to, in summary, trees, design and finishes, internal roads layout and lack of provision of childcare facilities. On Appeal, An Bord Pleanála refused permission for the development proposal on 5<sup>th</sup> October 2010 for the following reason:

*"Having regard to the existing features of the site, which include a substantial quantity of mature trees and hedgerow, and having regard to the layout indicated in the Kiltiernan Neighbourhood Framework Plan 2010, which includes the retention of these trees, it is considered that they layout as proposed, including extensive removal of viable trees and hedgerow to the east of Enniskerry Road and continuous car-parking to the front of the residential units, would fail to have adequate regard to the framework plan, would seriously injure the amenities of the area and of future occupants and would, therefore, be contrary to the proper planning and sustainable development of the area."*



**Figure 3.7: Proposed Site Layout Plan for the Subject Site under DLR Reg. Ref. DogA/0471**

**(Source: Dún Laoghaire-Rathdown County Council Online Planning Database, DLR Reg. Ref. DogA/0471)**

The scheme has progressed significantly since 2009 and there has been a significant progression in planning policy in the last 15 No. years. The proposed development takes into consideration all current planning policy pertaining to the site and is also cognisant of previous decisions pertaining to the lands, most recently the previously refused SHD Application as discussed earlier in this section. The development now proposed is a culmination of feedback received through pre-planning meetings and through the Opinion issued on the subject LRD, in addition to items raised in the previous decisions. Therefore, it is our opinion that the proposed development represents a sustainable development which will positively contribute to Kiltarnan Village by providing much needed housing in addition to an array of non-residential spaces, public open spaces and permeable connections.

### 3.2 Planning History of Site Vicinity

Permissions has been granted recently for several schemes in Kiltarnan. These are detailed below.

#### 3.2.1 Residential Planning Applications at Rockville

These lands are located to the north-east of the subject site.

<b>Location:</b>	Lands at Rockville House, Glenamuck Road South, Dublin 18, and Gatelodge (also known as Rockville Lodge)
<b>DLRCC Reg. Ref.:</b>	<b>D17A/0793</b>
<b>Application Date:</b>	6 <sup>th</sup> September 2017



<b>Development Description:</b>	This development will be the first phase of development on the residential zoned lands at Rockville House. Demolition of existing agricultural outbuildings on site; Retention of Rockville House to provide for 2 No. separate residential dwellings. Construction of a total of 49 No. dwellings consisting of 37 No. detached, semi-detached and terraced 2/3 storey houses and 12 No. apartments. The apartments will be provided within 1 no. four storey apartment block. Provision of 95 No. car parking spaces and a new vehicular access from Glenamuck Road South.
<b>DLRCC Decision:</b>	Grant Permission subject to 38 No. conditions
<b>DLRCC Decision Date:</b>	14 <sup>th</sup> December 2017
<b>Final Grant Date:</b>	25 <sup>th</sup> January 2018
<b>DLRCC Reg. Ref.:</b>	<b>D18A/0566 amended by D18A/1191</b>
<b>Application Date:</b>	13 <sup>th</sup> June 2018
<b>Development Description:</b>	Phase 2A of Rockville: Construction of 6 No. four-bed houses on a site south of Rockville House, with building heights of 2.5 No. storeys. The development will be accessed from the permitted local road within the adjoining the residential development to the north.
<b>DLRCC Decision:</b>	Grant Permission subject to 26 No. conditions (1 No. dwelling removed therefore permissions granted for 5 No. dwellings)
<b>DLRCC Decision Date:</b>	2 <sup>nd</sup> October 2018
<b>Note:</b>	Under DLR Reg. Reg. D18A/1191, an amendment application was submitted, which sought a change of house types only. Permission was granted by the Planning Authority on 19 <sup>th</sup> February 2019, which was subject to a Third Party Appeal to An Bord Pleanála (ABP-303871-19). Permission was ultimately granted on 24 <sup>th</sup> June 2019 subject to 11 No. conditions.
<b>DLRCC Reg. Ref.:</b>	<b>D20A/0015</b>
<b>Application Date:</b>	13 <sup>th</sup> January 2020
<b>Development Description:</b>	Phase No. 2B of Rockville: The application site is located to the south-east of the Phase 1 residential development permitted under Reg. Ref.: D17A/0793. The construction of a four-storey apartment block comprising of 56 No. residential units. The apartment block includes a 50.6 sq m gym, a 126 sq m creche, and private, communal, and public open space. The proposed development will connect to the infrastructure and services in the permitted Phase 1 residential development to the north-west and provide for future connections to other adjoining lands.
<b>DLRCC Decision:</b>	Refuse Permission
<b>DLRCC Decision Date:</b>	6 <sup>th</sup> March 2020
<b>ABP Reg. Ref.</b>	ABP-306999-20
<b>ABP Decision</b>	Grant Permission subject to 19 No. conditions
<b>ABP Decision Date:</b>	22 <sup>nd</sup> September 2020 (This site has been purchased by the Applicant and an amendment application has been granted (27 <sup>th</sup> May 2024) on this site- See below: DLR Reg. Ref. D23A/0580)
<b>DLRCC Reg. Ref.:</b>	<b>D23A/0580</b>
<b>Application Date:</b>	7 <sup>th</sup> September 2023



<b>Development Description:</b>	<p>In the Phase 2B scheme, permission was granted for the construction of a four storey apartment block comprising 56 No. apartments including 11 No. 1 beds, 39 No. 2 beds and 6 No. 3 beds. Permission was also granted for a gym and creche facility, private, communal and public open space, 72 No. surface parking spaces, cycle parking spaces, including bike stores, and bin stores. The permitted development connected into the infrastructure and services in the permitted Phase 1 residential development and provided for future connections to other adjoining lands.</p> <p>The subject amended application proposes the provision of 28 No. units comprising 12 No. two and three storey houses (9 No. 2 bedroom terraced houses and 3 No. 3 bedroom terraced houses) and 16 No. three and four storey duplex units in 3 No. blocks comprising 6 No. 1 bedroom units, 9 No. 2 bedroom units and 1 No. 3 bedroom unit. The amended scheme proposes 34 No. car-parking spaces, bicycle parking, bin and bike storage, communal and public open space, an attenuation tank, substation, and all associated works above and below ground.</p>
<b>DLRCC Decision:</b>	Grant Permission subject to 28 No. conditions <sup>24</sup>
<b>DLRCC Decision Date:</b>	24 <sup>th</sup> May 2024
<b>Final Grant Date:</b>	27 <sup>th</sup> June 2024

<sup>24</sup> Multi-modal link between Rockville and subject LRD site was granted under this application further to extensive discussions with the Planning Authority. This multi-modal link has been replicated within the subject LRD Application. This connection has been replicated in this LRD Application for completeness.

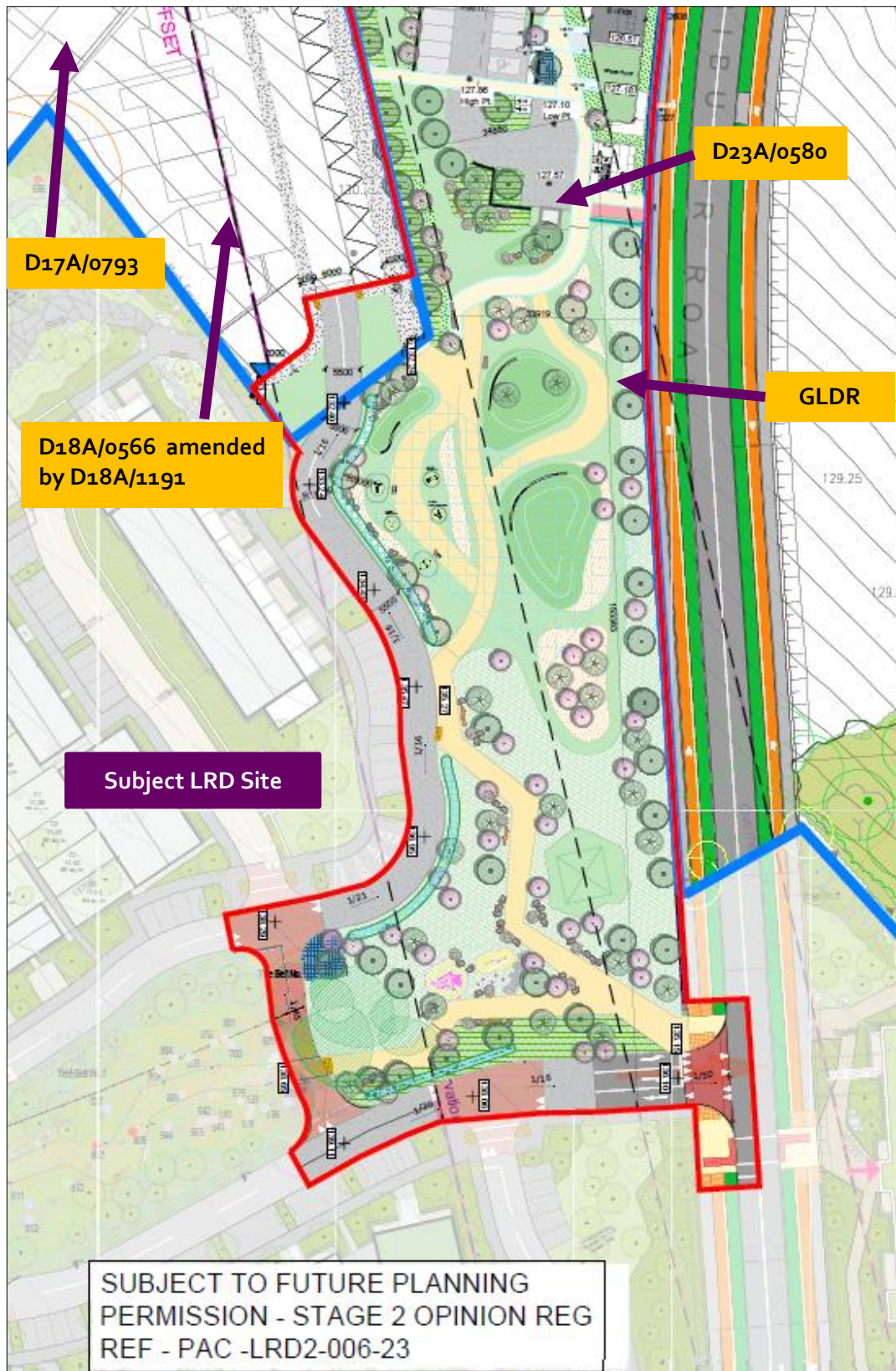


Figure 3.8: Site Plan Under DLRCC Reg. Ref. D23A/0580 in the Context of the Subject Application Lands

(Source: DLRCC Reg. Ref. D23A/0580, annotated by Thornton O'Connor Town Planning, 2024)

### 3.2.2 Strategic Housing Development Applications in the Area

This section will outline relevant Strategic Housing Development (SHD) Planning Applications in the vicinity of the subject site. A summary table is included below which refers to the numbers on the map following the table. Full details of each SHD are provided following this summary table and map.

No.	SHD	ABP Reg. Ref.
1.	Glenamuck Road/ Enniskerry Road SHD	ABP-306160-19
2.	Glenamuck Road SHD	ABP-303978-19
3.	Glenamuck Road South Amendment Application	ABP-312216-21
4.	Shaldon Grange SHD	ABP-307506-20
5.	Shaldon Grange SHD Relodge	ABP-312214-21
6.	Suttons Field SHD	ABP-307043-20
7.	Suttons Field SHD Amendment Application (LRD)	LRD23A/0358
8.	Enniskerry Road SHD [Adjoining Bishop's Gate]	ABP-309846-21
9.	Ashwood Farm SHD	ABP-313963-22



Figure 3.9: 'SHD' Planning Applications in Kiltiernan Village in the Vicinity of the Subject Site (Blue=Indicative Subject Lands, Green=Granted SHD, Red=Refused SHD)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2024)



# 1. ABP-306160-19: Glenamuck Road / Enniskerry Road SHD (197 No. Residential Units)

ABP Reference:	ABP-306160-19
Location:	Glenamuck Road / Enniskerry Road, Kilternan, Dublin 18, D18 X5H2
Application Date:	13 <sup>th</sup> December 2019
Development Description:	Permission for a strategic housing development consisting of: 1) the <b>demolition of 2 No. habitable dwellings on the site</b> - 'Greenmount' (195 sq m) and 'Dun Óir' (345 sq m inclusive of ancillary buildings); 2) i) the <b>construction of a 197 No. unit residential development</b> comprising: <b>62 No. houses and 115 No. apartments</b> in 7 No. blocks ranging in height from 3 to 4 No. storeys, and 20 No. duplex apartments in 4 No. three storey blocks; (ii) a 275 sq m crèche; (iii) the construction of the link access road between Enniskerry Road and Glenamuck Road required under the Kilternan/Glenamuck Local Area Plan 2013 including vehicular access points onto Enniskerry Road and Glenamuck Road. (www.kilternandoranplanning.com).
ABP Decision Date:	6 <sup>th</sup> April 2020
ABP Decision:	Grant Permission subject to 31 No. conditions



Figure 3.10: Site Layout of the Glenamuck Road / Enniskerry Road SHD

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ABP Ref. 306160-19)

# 2. ABP-303978-19 - Glenamuck Road SHD (203 No. Residential Units)

ABP Reference:	ABP-303978-19
Location:	Glenamuck Road South, Kilternan, Dublin 18

<b>Application Date:</b>	19 <sup>th</sup> March 2019
<b>Development Description:</b>	Permission for a strategic housing development consisting of 203 residential units within 12 No. blocks ranging in height from 3-6 No. storeys). The provision of a creche, a retail unit and a social/amenity facility. The development will include a new access from Glenamuck Road and the provision of access connection points, vehicular, cycle and pedestrian) to future adjacent development lands. <a href="http://www.glenamuckshd.ie">www.glenamuckshd.ie</a>
<b>ABP Decision Date:</b>	26 <sup>th</sup> June 2019
<b>ABP Decision:</b>	Grant Permission subject to 31 No. conditions

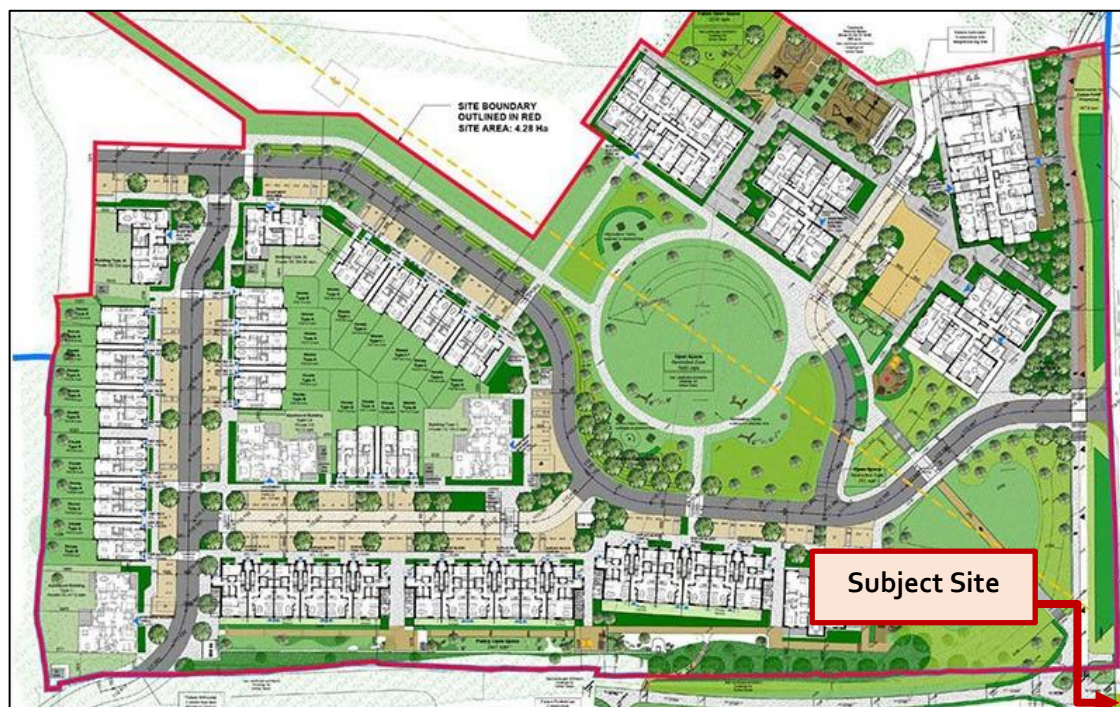


Figure 3.11: Site Layout of the Glenamuck SHD

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ABP Ref. ABP-303978-19)

### 3. ABP-312216-21 - Glenamuck Road South Amendment Application

<b>ABP Reference:</b>	ABP-312216-21
<b>Location:</b>	Glenamuck Road South, Kiltarnan, Dublin 18
<b>Application Date:</b>	14 <sup>th</sup> December 2021
<b>Development Description:</b>	Alteration to previously approved ABP-303978-19 for revision to unit types (the total number of units remain the same), removal of retail/coffee dock, provision of 1 No. additional substation and the increase in car and bicycle parking.
<b>ABP Decision Date:</b>	12 <sup>th</sup> September 2022
<b>ABP Decision:</b>	Amend in accordance with Section 146B(3)(a) of the <i>Planning and Development Act 2000</i>

#### 4. ABP-307506-20 - Shaldon Grange SHD (130 No. Residential Units)

<b>ABP Reference:</b>	<b>ABP-307506-20</b>
<b>Location:</b>	Shaldon Grange, Kilternan, Dublin 18
<b>Application Date:</b>	8 <sup>th</sup> July 2020
<b>Development Description:</b>	Permission for a phased strategic housing development to consist of the provision of <b>130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments</b> , ranging from <b>three to four storeys in height</b> . Vehicular access to the site will be from Enniskerry Road. <a href="http://www.landsatshaldongrangelilternanshd.com">www.landsatshaldongrangelilternanshd.com</a>
<b>ABP Decision Date:</b>	22 <sup>nd</sup> October 2020
<b>ABP Decision:</b>	Refuse Permission

Planning permission was refused by An Bord Pleanála on 22<sup>nd</sup> October 2020 for the following reason:

*"Having regard to the conclusion of the Planning Inspector and the planning authority that the proposed development is in material contravention of the Kilternan – Glenamuck Local Area Plan 2013 (2023) (in terms of its phasing plan, which allows for 700 No. units for Phase 1) and that the statutory requirements relating to public notices and a Material Contravention Statement had not been complied with by the applicant, the Board considers that it is precluded from and would not have jurisdiction to consider whether to grant permission in the absence of those statutory requirements being met."*

It is noted that permission was only refused because the Applicant failed to advertise that the proposed development contravened the phasing plan as opposed to the Board having any concern about the contravention of the phasing.

The application for a Strategic Housing Development at Shaldon Grange was relodged with An Bord Pleanála on the 15<sup>th</sup> December 2021, under ABP Ref. ABP-312214-21 (as detailed below).

#### 5. ABP-312214-21- Shaldon Grange SHD (130 No. Residential Units)

<b>ABP Reference:</b>	<b>ABP-312214-21</b>
<b>Location:</b>	Shaldon Grange, Kilternan, Dublin 18
<b>Application Date:</b>	15 <sup>th</sup> December 2021
<b>Development Description:</b>	Permission for a strategic housing development to consist of the provision of <b>130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments</b> , an associated site works. <a href="http://www.landsatshaldongrangelilternanshd.com">www.landsatshaldongrangelilternanshd.com</a>
<b>ABP Decision Date:</b>	11 <sup>th</sup> April 2022
<b>ABP Decision:</b>	Grant Permission





Figure 3.12: Site Layout of Shaldon Grange Proposed Phase 1 SHD and CGI of Proposed Development

(Source: Extract from ABP Ref. ABP-312214-21 and [www.landsatshaldongrangelkilternanshd.com](http://www.landsatshaldongrangelkilternanshd.com))

The An Bord Pleanála Inspector noted the following in relation to phasing:

*"In any event, it is evident that this quantum of development has not actually been constructed in the area since the adoption of the LAP. Some sites that have the benefit of an extant permission remain undeveloped, some are currently for sale. There is no certainty if or when sites that have the benefit of permission will be developed. Permission has been granted for the GDDRS and Enniskerry Road/Glenamuck Road Junction and construction works on these schemes appear imminent. Whilst I agree that it would have been preferable for the upgrade works to the Enniskerry Road/Glenamuck Road Junction to have taken place prior to the construction/occupation of these units, I am of the view that a pragmatic approach must be taken to the consideration of the issue of phasing and the appropriateness of permitting the development in the absence of the fully implemented road scheme. **Given this road infrastructure is likely to be implemented in a similar timeframe to the development of the site, I do not have issue with the granting of permission for the proposed units on this site. This would appear to be the view taken by the Board in other SHD applications in the area. If the Board is so minded, they may attached a condition stipulating that none of the dwelling units be occupied until such time as the GDDRS is completed and operational.***

*I note that Transport Infrastructure Ireland have not raised concerns in relation to this proposal. Based on the information before me in relation to timelines and expected delivery dates of road infrastructure, I do not consider that such a condition is necessary. Based on the information before me, I am satisfied that the proposed development can be accommodated on the existing road network until such time as the GDDRS is completed and operational.” [Our Emphasis]*

#### 6. ABP-307043-20- Suttons Fields SHD, Ballybetagh Road (116 No. Residential Units)

<b>ABP Reference:</b>	<b>ABP-307043-20</b>
<b>Location:</b>	Suttons Fields, Ballybetagh Road, Kilternan Village, Dublin 18.
<b>Application Date:</b>	9 <sup>th</sup> April 2020
<b>Development Description:</b>	Permission for a strategic housing development consisting of <b>116 dwellings and creche</b> . The dwellings will comprise: <b>85 No. houses and 31 No. apartments</b> . The buildings will range from <b>1-3 No. storeys in height</b> . The development will include a Main Road on its west boundary, running from Ballybetagh Road to the north boundary, that will facilitate linkage to development lands to the north. Pedestrian and cycle access will be provided from Ballybetagh Road into the site, along the west boundary of Our Lady of the Wayside National School, connecting to the site circulation roadway in the vicinity of the childcare unit. <b><a href="http://www.suttonsfieldsshd.ie">www.suttonsfieldsshd.ie</a></b> .
<b>ABP Decision Date:</b>	28 <sup>th</sup> August 2020
<b>ABP Decision:</b>	Grant Permission subject to 28 No. conditions



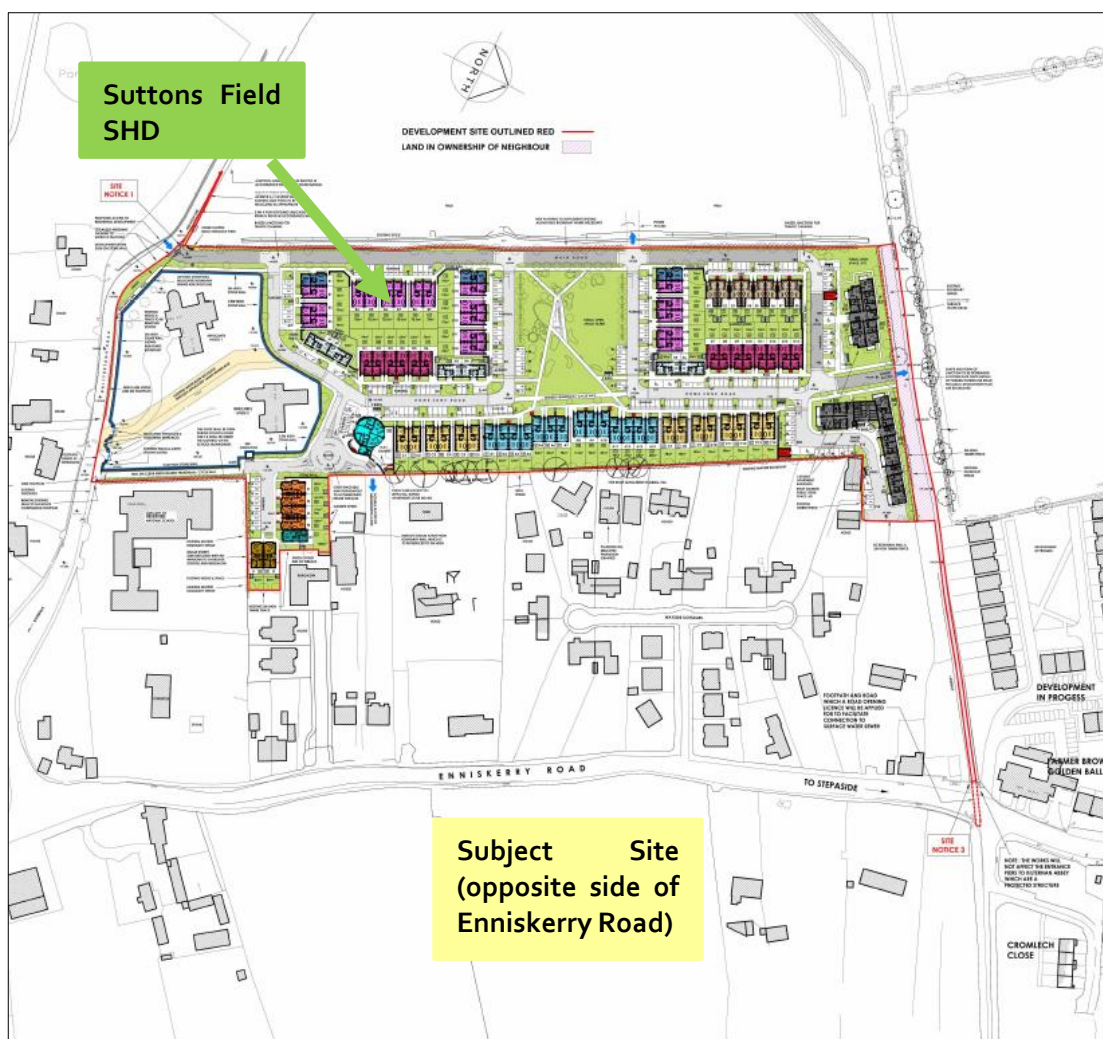


Figure 3.13: Site Layout of Suttons Field SHD (Subject Site Located to the East, on the Opposite Side of Enniskerry Road)

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ABP Ref. ABP-307043-20)

## 7. ABP-312216-21 – Suttons Field Amendment Application

LRD Reference:	LRD23A/0358
Location:	Suttons Fields, Ballybetagh Road, Kiltarnan Village, Dublin 18.
Application Date:	1 <sup>st</sup> June 2023
Development Description:	Modify a permitted Strategic Housing Development (SHD) (Ref. ABP-307043-20) by way of a planning application for a Large-Scale Residential Development (LRD), within the permitted "Suttonfield" development, currently under construction, located at Ballybetagh Road, Kiltarnan, Dublin 18. The proposed amendment consists of the replacement of a permitted 3 storey apartment building, accommodating 17 No. 1, 2 & 3 bed apartments, with (a) a new 3 storey apartment building, accommodating 12 No. 1 & 2 bed apartments, and (b) 3 No. 2 storey, 3 bedroom terraced houses. The proposed development also provides for all associated site development works, open spaces, hard & soft landscaping, boundary treatments, car &

	bicycle parking etc., on a site area of c.0.27 Ha, within the overall site area of the permitted "Suttonfield" residential development, which is c.3.8Ha. Access to the proposed development will be via the permitted "Suttonfield" development. Website: <a href="http://www.suttonfieldlrd.ie">www.suttonfieldlrd.ie</a>
<b>DLR Decision Date:</b>	21 <sup>st</sup> July 2023
<b>DLR Decision:</b>	Grant Permission <sup>25</sup>
<b>Note:</b>	24 <sup>th</sup> August 2023

## 8. ABP-307043-20 – Enniskerry Road SHD, Adjoining Bishop's Gate Housing Development (203 No. Residential Units)

<b>ABP Reference:</b>	ABP-309846-21
<b>Location:</b>	Enniskerry Road SHD, Adjoining Bishop's Gate Housing Development
<b>Application Date:</b>	30 <sup>th</sup> March 2021
<b>Development Description:</b>	203 No. residential units (109 No. houses, 94 No. apartments) and a creche. The heights range from 2 to 3 No. storeys. Vehicular access serving the proposed development primarily via the existing junction off Enniskerry Road serving the Bishops Gate development. <a href="http://www.enniskerryroadshd.com">www.enniskerryroadshd.com</a>
<b>ABP Decision Date:</b>	15 <sup>th</sup> July 2021
<b>ABP Decision:</b>	Grant Permission subject to 26 No. conditions

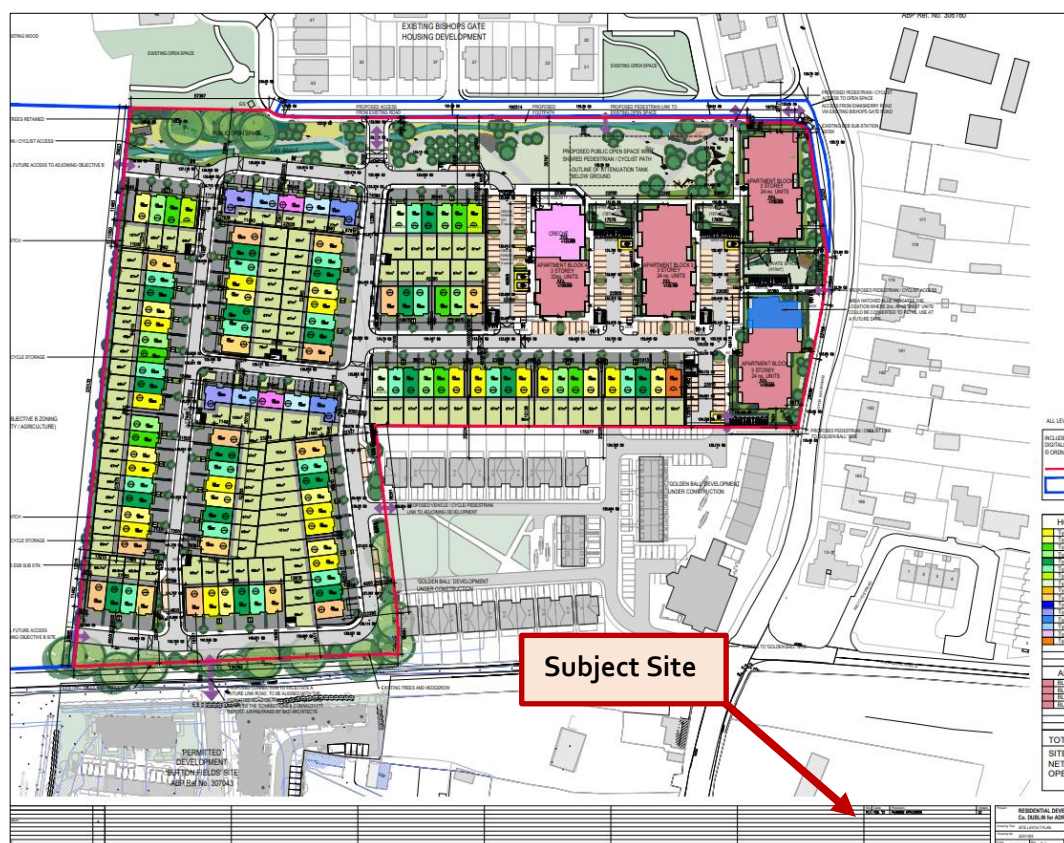


Figure 3.14: Site Layout of Enniskerry Road SHD

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ABP Ref. ABP-309846-21)

<sup>25</sup> Reduces the permitted SHD by 2 No. units.

## 9. ABP-313963-22 – Ashwood Farm SHD, Glenamuck Road South Housing Development (305 No. Residential Units)

<b>ABP Reference:</b>	<b>ABP-313963-22</b>
<b>Location:</b>	Ashwood Farm, Glenamuck Road South
<b>Application Date:</b>	1 <sup>st</sup> July 2023
<b>Development Description:</b>	305 No. residential units (289 No. BTR Apartments, 16 No. apartments) and a creche. <a href="http://www.ashwoodfarmshd.com">www.ashwoodfarmshd.com</a>
<b>ABP Decision Date:</b>	31 <sup>st</sup> July 2023
<b>ABP Decision:</b>	Refuse Permission

Permission was recently refused for this scheme for 4 No. reasons, summarised as follows:

1. The density of 109 No. units per Hectare was considered too high in this location.
2. Heights of up to 7 No. storeys contravene the Kilternan LAP and are out of character with the area.
3. The scheme doesn't comply with the phasing set out in the Kilternan LAP.
4. Elements of the scheme do not provide a suitable high-quality design.

With regard to Point No. 3 above in particular, it is noted that the *Kilternan LAP* has now expired and thus should this phasing issue should be no longer relevant.

### 3.3 ABP-303945-19 - Glenamuck District Roads Scheme

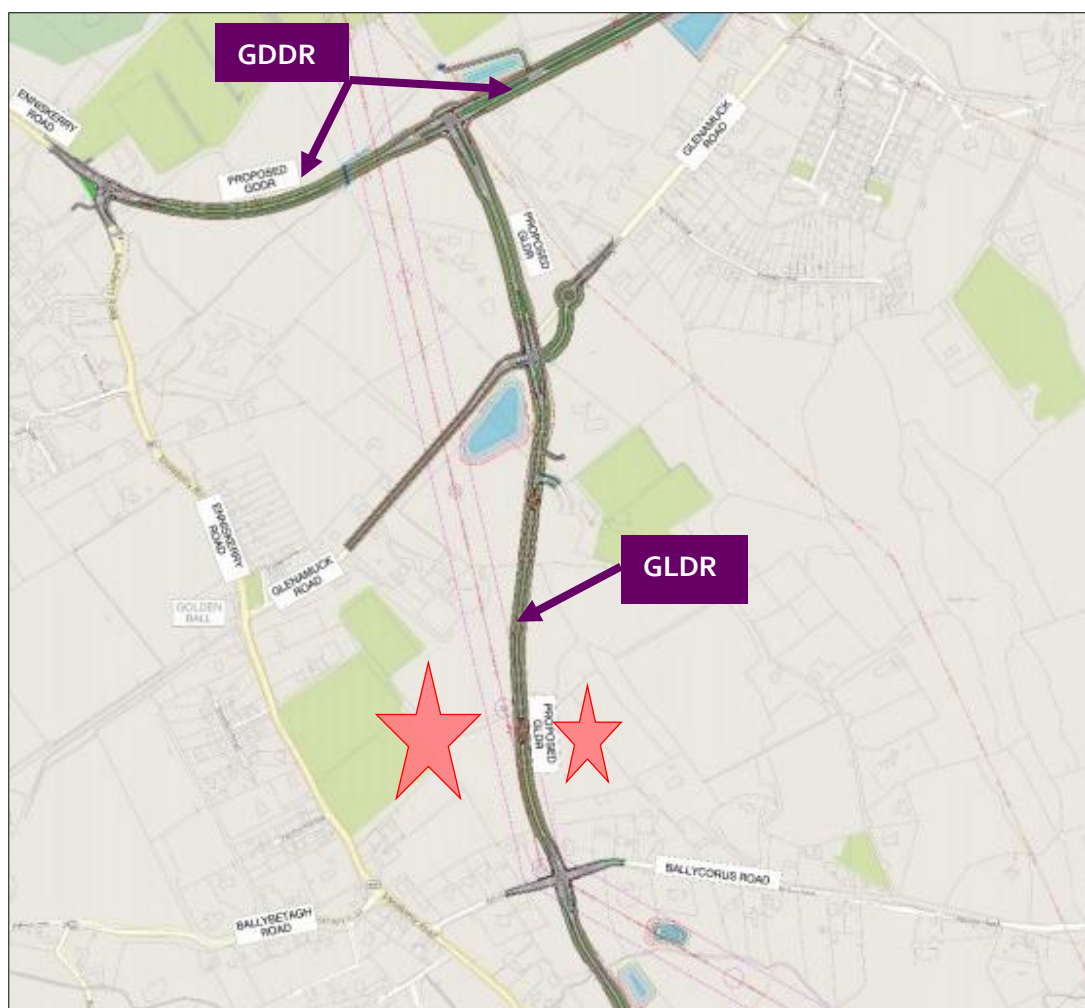
The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18<sup>th</sup> December 2019 (ABP Reg. Ref. HA06D.303945).

The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Bord Pleanála on 18<sup>th</sup> December 2019 (ABP Reg. Ref. HA06D.303945). The Applicant has been working closely with DLRCC in relation to the road works and we have been advised that the contractors have now moved on site and have commenced works. DLRCC have issued a programme of works with completion dates for each section. In relation to the expected completion date for the GLDR, DLRCC/Contractors are advising completion in Q1 2026.

The GDRS extent adjoining the site consists of the:

- Glenamuck District Distributor Road (GDDR)- consisting of c. 600 metres of two-way lane single carriageway from Enniskerry Road tie in to the GDDR/GLDR junction and c. 890 metres of four-lane dual carriageway from this junction to Golf Lane Roundabout; and
- Glenamuck Distributor Road (GLDR)- consisting of c. 1.8 km of predominantly single lane carriageway road.



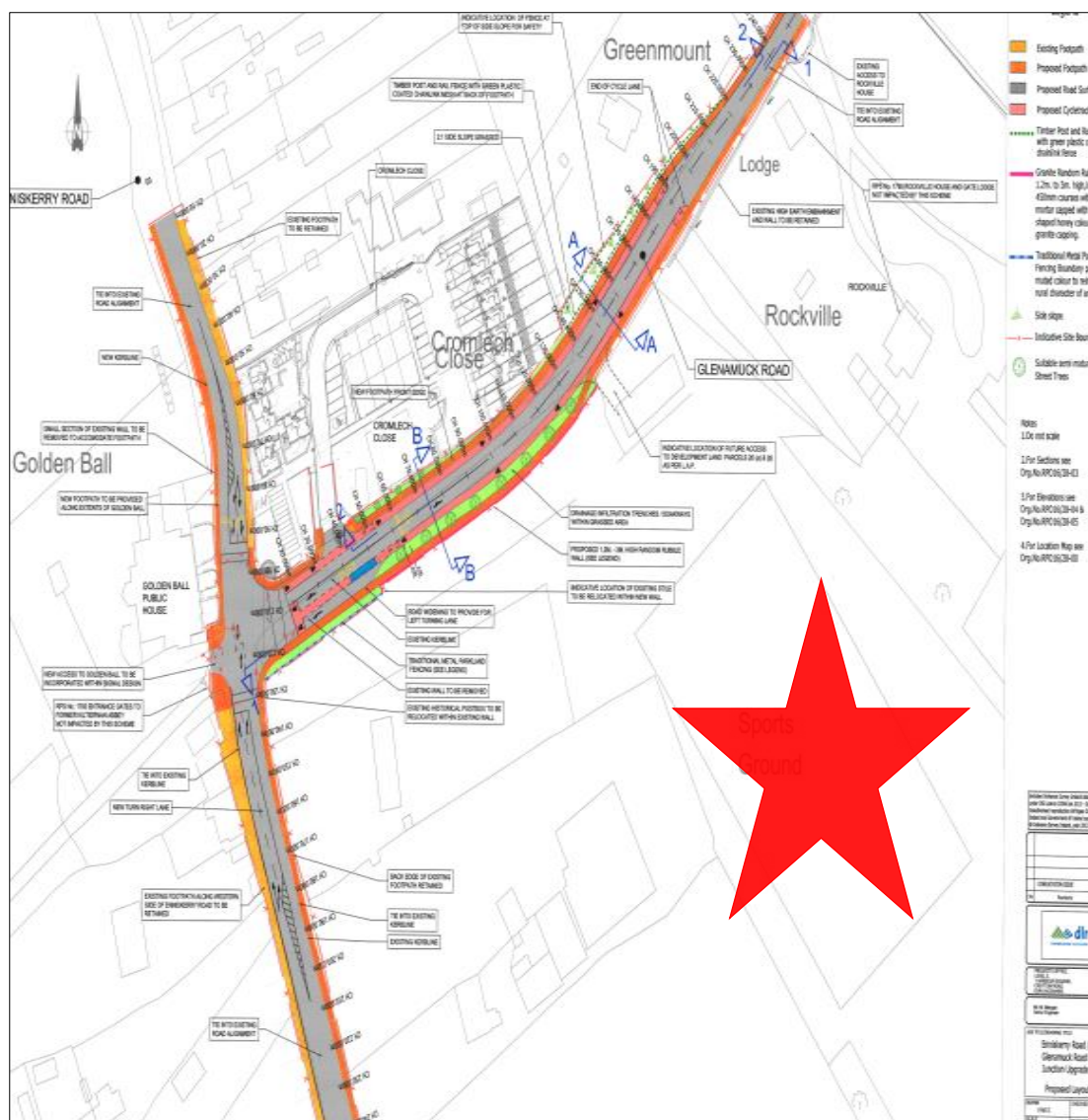


**Figure 3.15: Overview of Permitted GDRS (Subject Sites Denoted Indicatively by the Red Stars)**

(Source: Dún Laoghaire-Rathdown County Council, Glenamuck District Road Scheme EIAR, annotated by Thornton O'Connor Town Planning, 2024)

The proposed new distributor and link roads, with associated traffic management measures and site works (including attenuation ponds), would join the existing road network with new junction(s) to be formed with the R117 (Enniskerry Road), the R116 (Ballycorus Road), Barnaslignan Lane and the Glenamuck Road.

In the interests of current national, regional and local objectives, the delivery of sequential development is appropriate along the now approved and soon to be constructed GDRS. As well as accommodating the traffic volumes associated with the development of all the *Kilternan LAP* lands, these roads will incorporate the provision of future bus service improvements as well as footpath and cycle track provision which will be linked to the proposed development site.



**Figure 3.16: Overview of Permitted Part 8 (Subject Western Site Indicatively Denoted by the Red Star)**

(Source: **Dún Laoghaire-Rathdown County Council, Glenamuck District Road Scheme EIAR, annotated by Thornton O'Connor Town Planning, 2024)**

### 3.4 PC/1C/01/21 - DLRCC Part 8 Application for a Public Park and Recreational Facilities on lands adjacent to Glenamuck South

Dun Laoghaire-Rathdown County Council is proposing to develop a public garden and recreational facilities comprising a children's play area, 'kickabout' area, water feature, footpaths, bench seating, tree planting, and ancillary works at Glenamuck Road South between 'Rockville' and the proposed 'Glenamuck Link Distributor Road'. Dun Laoghaire-Rathdown Infrastructure & Climate Change Department received Part 8 planning approval (with amendments) at the Council Meeting on 14<sup>th</sup> June 2021.

This proposal for a public park is located at a site c. 350 metres away from the proposed Glenamuck Road entrance to the subject development proposal.





**Figure 3.17:** Proposed Development of Public Park and Playground at the Junction between Glenamuck Road South and the permitted Glenamuck Link Distributor Road (GLDR)

(Source: Cunnane Stratton Reynolds Land Planning & Design and DLRCC, 2021)

Figure 3.18 below demonstrates the location of this new park (annotated as “Glenamuck Park”) to the north of the subject lands:



**Figure 3.18:** Image Extracted from the Landscape Design Statement Enclosed Demonstrating Location of this New Park to the North of the Subject Lands

(Source: Landscape Design Statement, NMP Landscape Architects, 2024)



### 3.5 Summary of the Surrounding Development Context

The surrounding planning applications demonstrate an evolving urban context which has been supported by the planned creation of the Kilternan Village Centre and has involved the transition from detached houses to higher density schemes, which also provide for a range of housing types. This can be attributed to the proposed development of the GDRS, which allows for higher density residential and mixed-residential units in the Kilternan and Glenamuck area.

It is our opinion that the development subject to this application will provide high quality residential units with a Neighbourhood Centre to serve the Kilternan area on an underutilised site. The scheme addresses the reasons for refusal set out in the previous SHD application, which largely related to the layout of the Neighbourhood Centre and impacts of Apartment Blocks C and D.

## 4.0 DESCRIPTION OF DEVELOPMENT

### 4.1 Summary Description of Development

The proposed development is summarised below:

- Demolition of c. 740 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings (permission already granted for their demolition in the Phase 1 application) and the former Kiltiernan Country Market (a wooden structure).
- Construction of 487 No. residential units (196 No. houses, 201 No. duplex units and 90 No. apartments) and a Neighbourhood Centre.
- The western site will comprise 362 No. residential units and the Neighbourhood Centre, which will provide an anchor retail store (c. 1,310 sq m), retail/commercial (c. 3,284 sq m), a restaurant (c. 182 sq m), a creche (c. 691 sq m), café (c. 326 sq m), and a community facility (c. 332 sq m), and the eastern site will comprise 125 No. residential units.
- The development also includes road works and drainage works throughout including, inter alia, vehicle links to the neighbouring "Rockville" development, the future Glenamuck Link Distributor Road, Enniskerry Road and Glenamuck Road; pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" developments to the north-east and a pedestrian/cycle route through the Dingle Way from Enniskerry Road to the future Glenamuck Link Distributor Road.
- 854 No. car parking spaces, motorcycle parking and bicycle parking.



Figure 4.1: Site Layout Plan

(Source: MCORM Architects, 2024)

## 4.2 Key Site Statistics

<b>Total Red line Site Area:</b>	c. 14.2 Ha
<b>Developable Site Area (excluding external drainage/road works):</b>	c. 13.5 Ha
<b>Net Site Area<sup>26</sup>:</b>	c. 13.2 Ha
<b>Existing Floor Space (to be demolished):</b>	c. 740 sq m
<b>Gross Floor Area:</b>	c. 60,504 sq m (in addition to an undercroft parking level measuring c. 4,485 sq m on the eastern site)
<b>Dual Aspect Units:</b>	100% of houses are dual aspect 83.5% of duplexes and apartments are dual aspect
<b>Public Open Space:</b>	23,636 sq m (18% of net site area)
<b>Communal Open Space:</b>	4,364 sq m
<b>Number of Residential Units:</b>	487 No. units
<b>Non-residential floor space (Neighbourhood Centre)</b>	6,125 sq m as follows: <ul style="list-style-type: none"> <li>○ anchor retail store (c. 1,310 sq m)</li> </ul>

<sup>26</sup> As defined in the Compact Guidelines, 2024.



	<ul style="list-style-type: none"> <li>○ retail/commercial (c. 3,284 sq m)</li> <li>○ creche (c. 691 sq m)</li> <li>○ restaurant (c. 182 sq m)</li> <li>○ café (c. 326 sq m), and;</li> <li>○ community facility (c. 332 sq m)</li> </ul>
<b>Height:</b>	2-4 No. storeys (partially over podium/undercroft level in Apartment Blocks 1, 2 and 3 and Duplex Blocks T and U on the eastern site).
<b>Net Density:</b>	41.27 No. units per hectare
<b>Car Parking:</b>	854 No. car parking spaces (125 No. in the undercroft of Apartment Blocks 1, 2 and 3 and Duplex Blocks T and U and 729 No. at surface level) including 28 No. mobility impaired spaces, 100 No. electric vehicle spaces, and 4 No. drop-off spaces/loading bays.
<b>Bicycle Parking:</b>	823 No. spaces
<b>Motorcycle Parking:</b>	24 No. spaces

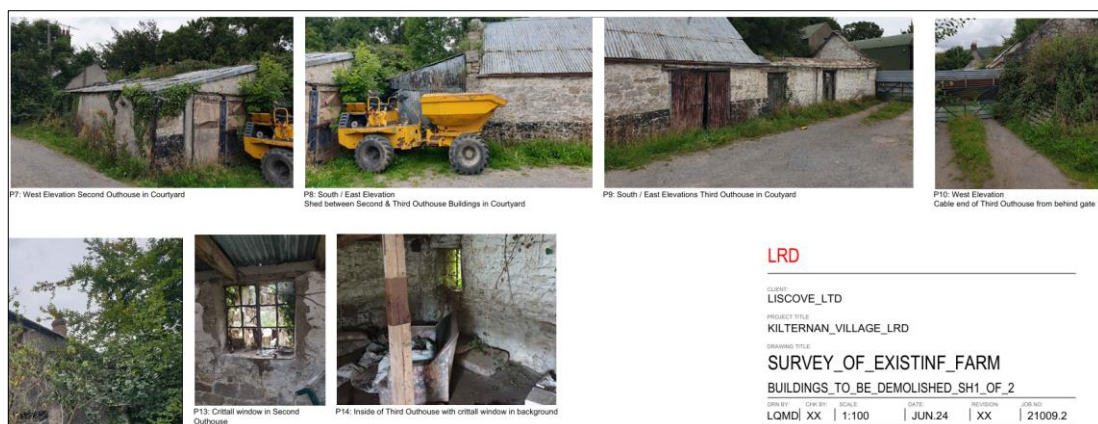
#### 4.3 Derelict Buildings to be Demolished

The proposed development includes the demolition of c. 740 sq m of existing structures on site comprising a derelict dwelling known as 'Rockville' and associated derelict outbuildings (c. 573 sq m) in addition to the former Kilternan Country Market (c. 167 sq m). As shown in the images below, the derelict dwelling and outbuildings are in bad condition and in our opinion, do not possess architectural merit and requires demolition in order to provide a high-quality scheme in the heart of Kilternan. This was accepted by the Planning Authority in the Phase 1 application. In addition, the former market structure is a 'cabin-like' wooden structure and does not possess architectural merit in our opinion.



**Figure 4.2:** Extracts from MCORM Architects Dwg No. PL605 Demonstrating the Poor Condition of the Derelict Buildings on Site

(Source: MCORM Architects, 2024)



**Figure 4.3:** Extracts from MCORM Architects Dwg No. PL605 Demonstrating the Poor Condition of the Derelict Buildings on Site

(Source: MCORM Architects, 2024)



**Figure 4.4:** View of a Portion of the Derelict Buildings (Rockville dwelling) from Enniskerry Road with Dwelling Providing a Blank Gable onto Enniskerry Road

(Source: Google Streetview)





**Figure 4.5: View of the Former Kiltiernan Country Market Timber Structure**

(Source: Google Streetview)

#### 4.4 Unit Mix

A description of the proposed unit mix and types, and why there is a variety in such types, is provided in the 'Architectural & Urban Design Statement' by MCORM Architects, which states:

*"There are 487 dwelling units being proposed, 196 houses, 201 duplexes and 90 apartments.*

*Throughout the development there are 5 no. principal house types proposed. These vary in form and are terraced & semi-detached. The mix of dwelling type and size will facilitate lifetime housing, providing a variety of accommodation choices for households including singles, couples and families. For example should older people need to down size at any stage, they can move within their own development into a small dwelling if and when their space requirements change. Similarly younger owners can trade up to larger units later in life as the need arises."*

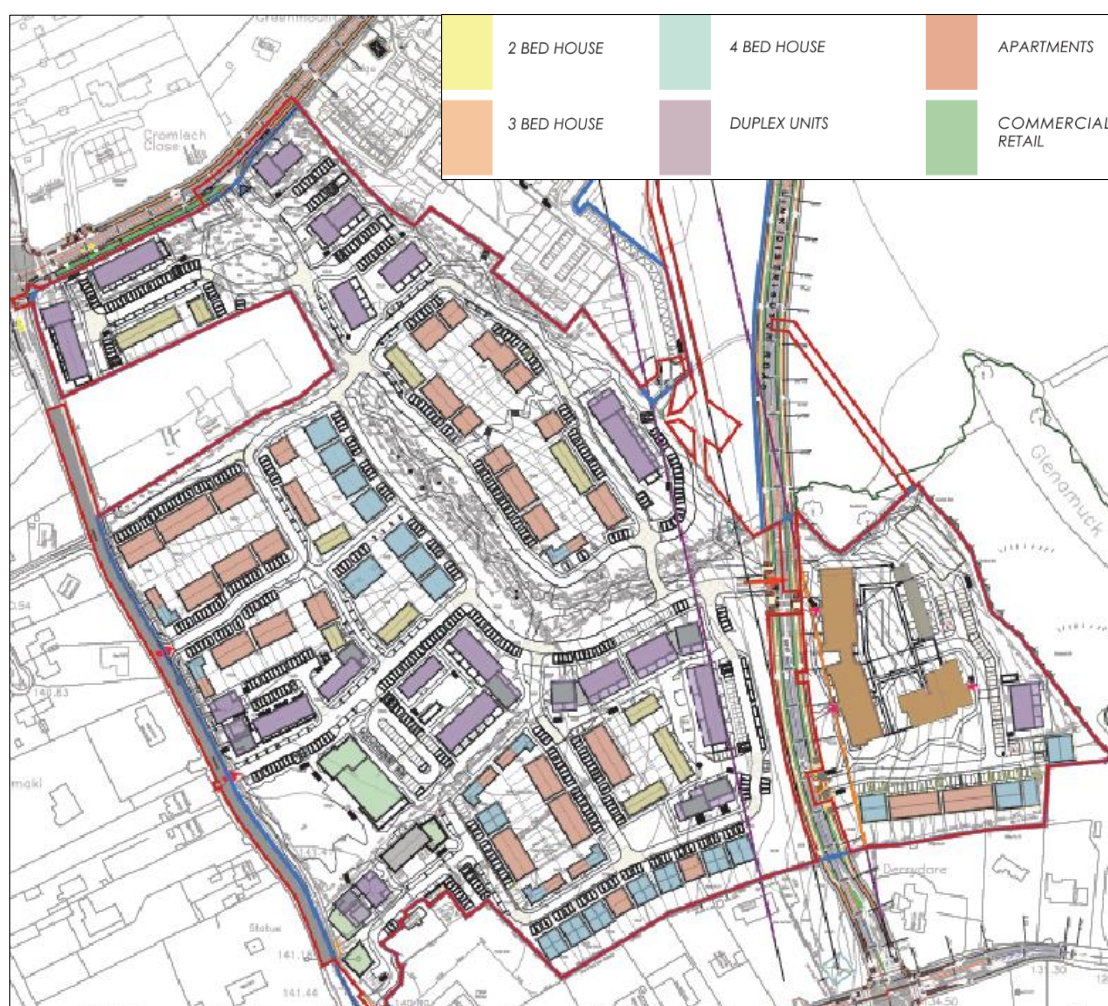
The mix of 1 No. to 4 No. bedroom duplexes, apartments and houses are provided in the following table:

Unit Types	House	Duplex	Apartments	Total	Unit Mix
1 Bed	-	18	35	53	11%
2 Bed	38	96	16	150	31%
3 Bed	110	87	39	236	48%
4 Bed	48	-	-	48	10%
<b>Total</b>	<b>196</b>	<b>201</b>	<b>90</b>	<b>487</b>	<b>100%<sup>27</sup></b>

<sup>27</sup> Some 126 No. apartments and duplexes are 3 No. bedroom units, which represents 43% of the 291 No. apartments and duplexes provided.



An extract from the 'Architectural and Urban Design Statement' prepared by MCORM Architects shows the various house types plotted throughout the development:



**Figure 4.6: Plan Illustrating the Variety of Units Proposed in the Subject Scheme**

(Source: MCORM Architects, 2024)

Please refer to the drawings submitted for detailed description and visualisation of each unit type.

#### 4.5 Non-Residential Floorspace

The Neighbourhood Centre will provide a new community hub in the heart of Kiltarnan Village, due to its location facing onto the Village Green which fronts onto Enniskerry Road. This new Village Green will be provided to the front of the Neighbourhood Centre, which will animate the streetscape along Enniskerry Road and will improve and enhance legibility and permeability for the area. The following commercial elements will be provided in the proposed development (in addition to the residential units):

Use	Sq m
Anchor Retail	c. 1,610 sq m
Retail / Commercial	c. 3,284 sq m
Crèche	c. 691 sq m
Restaurant	c. 182 sq m

Café	c. 326 sq m
Community Facility	c. 332 sq m
<b>Total</b>	<b>6,125 sq m</b>

The new Neighbourhood Centre will become the focal point for the village and will significantly enhance the amenity provision for the local community. There will also be a new plaza area fronting Enniskerry Road, which will provide an attractive environment adjacent to the Our Lady of the Wayside Church.

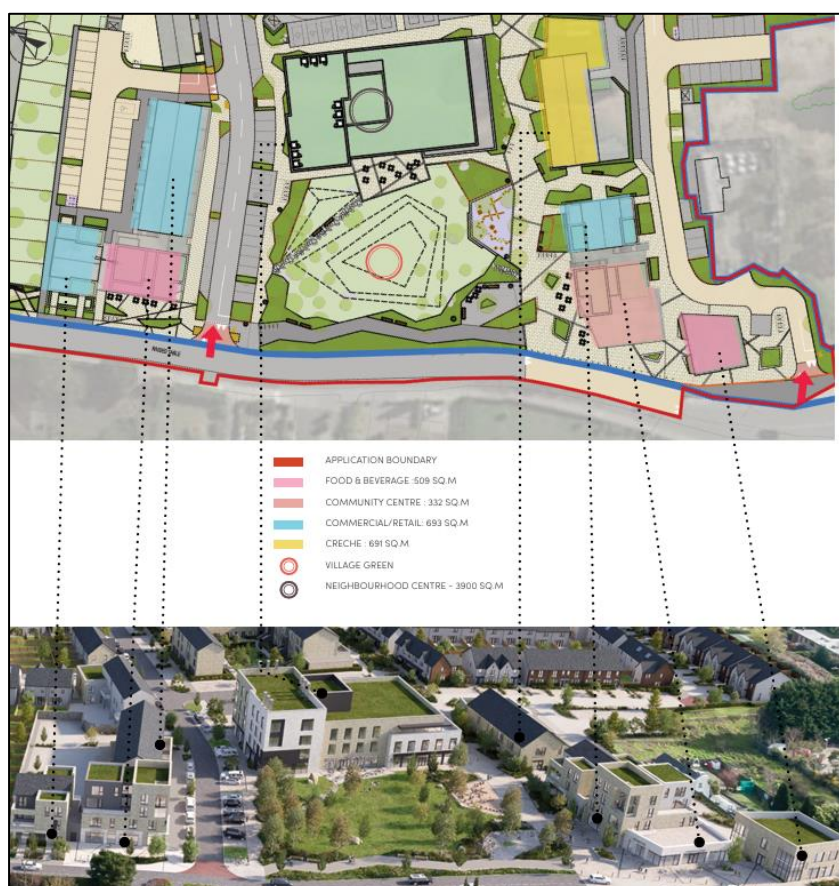


Figure 4.7: Neighbourhood Centre Layout Including Village Green<sup>28</sup>

(Source: MCORM Architects, 2024)

We reiterate that permission has been granted for Phase 1 of the LRD Planning Application which includes the non-residential uses along Enniskerry Road (except for the anchor retail Neighbourhood Centre block). Phase 1 is replicated within this LRD for completeness.

#### 4.6 Café and New Plaza Space

A café and plaza space are proposed along the Enniskerry frontage, opposite Our Lady of the Wayside church. This will create an attractive meeting space for the public and will maximise footfall in this location. This space will animate the streetscape and provide a focal point in the village, especially as this space opens onto the Dingle Way connection.

<sup>28</sup> Non-residential figures are summarised in the image.





**Figure 4.8: Image of the Interaction Between the Café, Plaza and Church Opposite**

(Source: 3D Design Bureau, 2024)

As noted above, permission has already been granted by the Planning Authority for the proposed café and plaza area under DLRCC Reg. Ref. D23A/0616.

#### 4.7 Residential Design & Layout

In relation to the site layout, the scheme has taken advantage of the site's frontage onto Enniskerry Road and the future GLDR. The Enniskerry Road frontage will be a hub of activity due to the various mix of uses proposed. We note that the eastern site has taken advantage of the future GLDR and has provided apartment blocks fronting the streetscape which will enclose the road at this location.

In addition, the proposed development has been designed to ensure that buildings' proximity has the relevant clearance either side of the centre line of the overhead power lines that traverse the site.

In relation to materials and finishes, Section 5.5 of the 'Architectural and Urban Design Statement' prepared by MCORM Architects includes the following details:

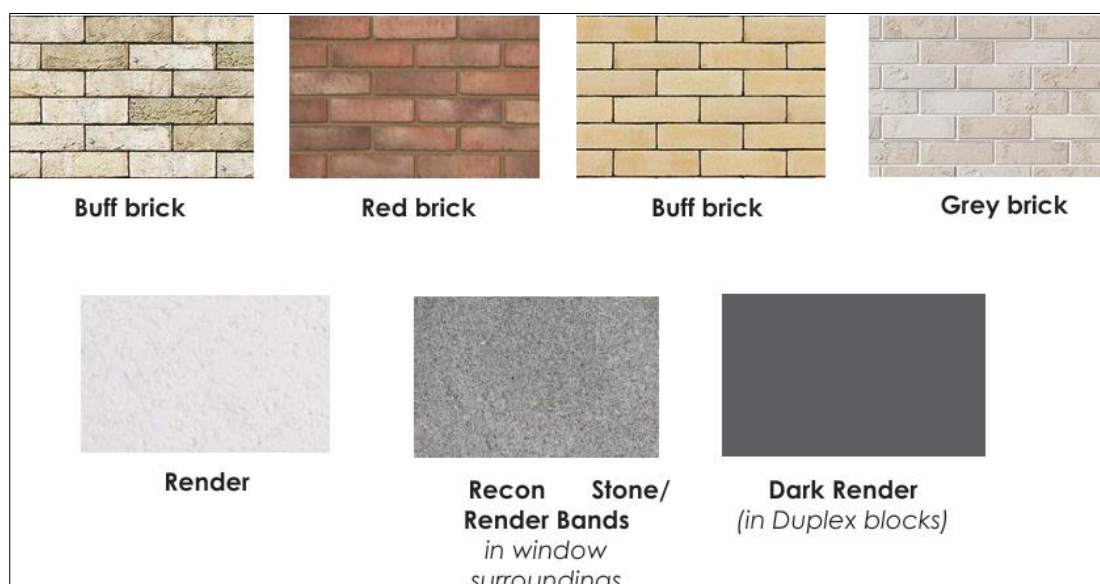
*"The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality."*

*Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies."*



*The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development."*

Figure 4.9 illustrates the palette of materials to be used:



**Figure 4.9: Proposed Palette of Materials for the Scheme**

(Source: 'Architectural and Urban Design Statement' prepared by MCORM Architects, 2024)

#### 4.8 Height & Massing

The subject development predominately ranges in height from 2 to 4 No. storeys (partially over podium/undercroft level in Apartment Blocks 1, 2 and 3 and Duplex Blocks T and U on the eastern site). The Neighbourhood Centre block will be up to 3 No. storeys in height and will predominately face the Village Green and Enniskerry Road. Along the site's boundary with the neighbouring Rockville developments, the maximum heights will be 3 No. storeys with appropriate setbacks. Heights of up to 4 No. storeys will be provided on the eastern site given its frontage onto the future GLDR and associated ability to absorb additional height.

It is our professional planning opinion that the proposed heights can be easily absorbed without any undue impact on the character of the area or the amenity of neighbouring properties. In our opinion, the heights provided in the subject development are appropriate having regard to the express requirement in National level policy to achieve compact growth, in addition to the careful modulation of height throughout the site. The *National Planning Framework* ("NPF") and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018* ("Building Height Guidelines"), both encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl.

#### 4.9 Pedestrian and Vehicular Access Points

The development proposes vehicular access from Enniskerry Road and Glenamuck Road, 2 No. vehicular access points from the future Glenamuck Link Distributor Road (GLDR) (one to the western site and one to the eastern site), a new vehicular link to the neighbouring Rockville development to the north-east, pedestrian links from Enniskerry Road and within the site to the neighbouring "Rockville" development, and a pedestrian / cycle route through part of the Dingle Way from Enniskerry Road to the future GLDR, which has commenced construction.

A key objective of the scheme is to reduce car dependency by providing high quality pedestrian and cycle networks. The enhancement and provision of permeable connections through the site, in particular part of the Dingle Way, will make a positive contribution to the Village. The Dingle Way is a permeable connection route linking Enniskerry Road to the future GLDR. This avenue will become a key link for the village and will be accessible adjacent to the Village Green and café/community centre.

The increased permeability of the development to its surrounding context is important to connect residents to surrounding opportunities. The street network for the proposed development aims to provide a permeable street layout that emphasises pedestrian priority and clearly defined street typologies.



**Figure 4.10: Proposed Dingle Way and Other Connections Proposed for the Subject Site**

(Source: 'Architectural and Urban Design Statement' prepared by MCORM Architects, 2024)

#### 4.10 Landscaping and Open Spaces

A range of high-quality public and communal open spaces have been proposed to cater for the recreational and amenity requirements of future residents and for the wider community through the provision of a Village Green, the Dingle Way and the Woodland Corridor for example, amongst other spaces.





**Figure 4.11: Extract from The Open Space Plan**

(Source: Dwg No. L1\_102\_1, prepared by NMP Landscape Architects)

The open spaces have been developed with proposed extensive path systems that are organic in style. The 'Landscape Design Statement' prepared by NMP Landscape Architects notes that:

*"The landscape design has been planned in such a way so as to maximise the site's orientation and anticipated microclimate to create habitable, quality spaces which respond to human comfort, encouraging residents and public into a safe and surveilled space. A number of potential routes through the site have been identified to benefit connections with its surroundings and provide a better amenity for the wider community. Pedestrian and cycle routes complement this strategy underpinning the sustainable credentials associated with the development.*

*In addition, it is anticipated that the development will offer a net gain to biodiversity through the development of additional habitat connecting existing surrounding ecological stands with continuous tree canopies for bat and bird roosting and provision of specific plants for wildlife to forage through.*

*An increased number of trees, areas for surface water treatment and wildflower meadows, coupled with best practice maintenance will ensure a sustainable landscape for the future. Edge conditions and relationships with neighbouring developments are sensitively integrated and screened."*



The scheme includes 23,636 sq m of public open space and 4,364 sq m of communal open space. A sample of the high-quality open spaces are provided in the images below:



**Figure 4.12: CGI Demonstrating Scheme's High-Quality Public Open Space Provision (Village Green)**

(Source: 3D Design Bureau, 2024)



**Figure 4.13: CGI Demonstrating Scheme's High-Quality Public Open Space Provision (Village Green)**

(Source: 3D Design Bureau, 2024)





**Figure 4.14:** Illustration Demonstrating Scheme's High-Quality Public Open Space Provision (Dingle Way)

(Source: NMP Landscape Architects, 2024)



**Figure 4.15:** Image Demonstrating Scheme's High-Quality Public Open Space Provision (Dingle Way and Plaza)

(Source: NMP Landscape Architects, 2024)





**Figure 4.16: CGI Demonstrating Scheme's High-Quality Public Open Space Provision (Northern Public Open Space)**

(Source: 3D Design Bureau, 2024)



**Figure 4.17: Image Demonstrating Scheme's High-Quality Public Open Space Provision (Woodland Corridor)**

(Source: 3D Design Bureau, 2024)





**Figure 4.18: CGI Demonstrating Scheme's High-Quality Public Open Space Provision (Public Plaza)**

(Source: 3D Design Bureau, 2024)



**Figure 4.19: CGI Demonstrating Scheme's High-Quality Communal Open Space Provision (Open Space Located on Eastern Lands)**

(Source: 3D Design Bureau, 2024)

Please refer to the Landscape Pack for further details on landscaping and open space provision for the subject development. In addition, Section 2.4 and Section 3.7 of the 'Summary Response to LRD Opinion' prepared by Thornton O'Connor Town Planning and enclosed separately provides compressive responses to landscaping items raised by Dun Laoghaire-Rathdown County Council in their LRD Opinion.

## 5.0 STATEMENT OF CONSISTENCY - NATIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework (2018);*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All—a New Housing Plan for Ireland (2021);*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023);*
7. *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024);*
8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
9. *Retail Planning Guidelines for Planning Authorities (2012);*
10. *Design Manual for Urban Roads and Streets (2019);*
11. *The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009);*
12. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016;*
13. *Part V of the Planning and Development Act; and*
14. *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009).*

### 5.1 ***Project Ireland 2040 – The National Development Plan 2021-2030***

The *National Development Plan 2021 – 2030*, ("NDP") document was published in 2021 as an updated version of the previous *National Development Plan 2018 – 2027*.

As part of *Project Ireland 2040*, the NDP sets out the Government's over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the significant demand for public investment across all sectors and regions of Ireland with a major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.



The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All– a New Housing Plan for Ireland, September 2021* (“*Housing for All*”) and will enable a step-change in investment to ameliorate the effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework* (“*NPF*”).

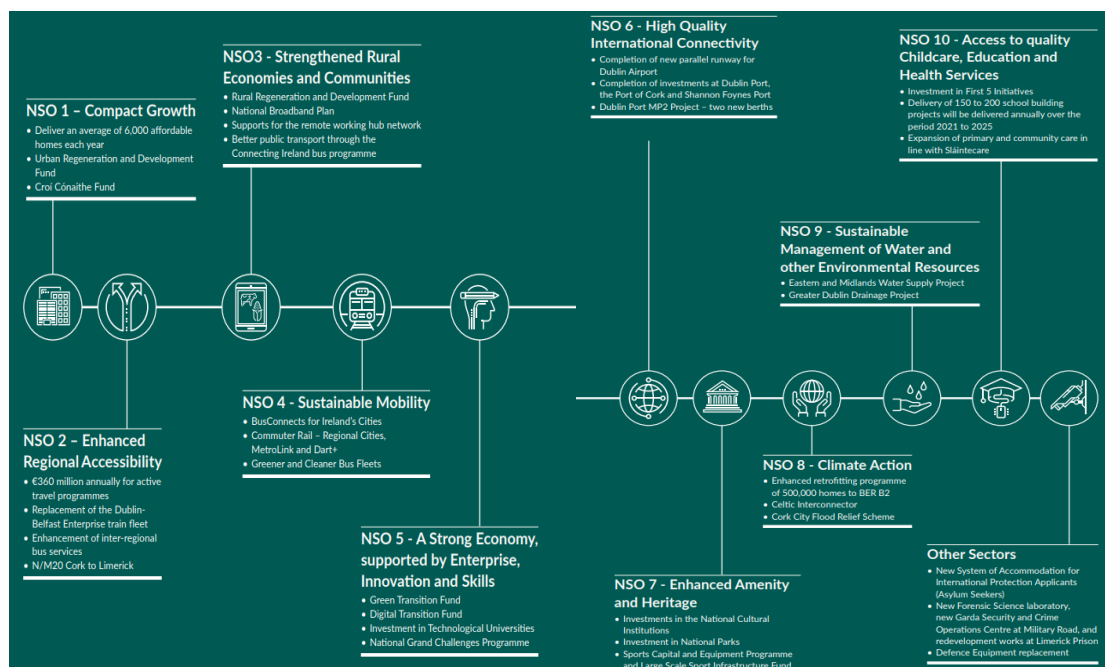


Figure 5.1: Major Investments – National Strategic Outcomes

(Source: *National Development Plan 2021-2030*)

The *NPF* has 10 No. National Strategic Outcomes, which are referenced in the *NDP*. The relevant strategic outcomes and objectives are discussed below at Section 5.2 of this report.

## 5.2 *Project Ireland 2040: National Planning Framework*

### 5.2.1 Introduction

*Project Ireland 2040: National Planning Framework* (“*NPF*”) is the Government’s high-level overarching strategic plan that aims to shape the future growth and development of the country.

The *NPF* is a long-term Framework that sets out how Ireland can move away from the current ‘business as usual’ pattern of development.

As set out in Section 6.6 of the *NPF*, a core principle of the *NPF* is to:

*“Allow for choice in housing location, type, tenure and accommodation in responding to need”, in addition to tailoring ‘the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.’*

Therefore, we submit that the provision of 487 No. high-quality residential units, comprising a mix of 1, 2 3 and 4 No. bedroom units ranging from apartments to duplexes to houses, and

Neighbourhood Centre at the subject site will contribute to achieving this core principle of the *NPF*.

Section 6.6 of the *NPF* states that:

*"While apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments.!"*

The *NPF* further calculates at Section 6.6 that:

*"Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, **with increasing demand to cater for one and two-person households.**"* [Our Emphasis]

Furthermore, it is noted that *"achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010."*

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *"in Dublin city, one, two and three-person households comprise 80 percent of all households."* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'*. The policy document denotes that *"...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it"*. [Our Emphasis]

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides a mix of dwelling unit types (apartments, duplexes and houses) ranging in size from 1 No. to 4 No. bedroom units, in addition to a Neighbourhood Centre, that will meet the needs of the future residents and the wider public.

By providing a range of unit sizes and unit types, the scheme will cater for all household sizes and types, creating a sustainable community from first-time buyers to family houses to people trading down in the area.

Section 2.2 of the *NPF* sets out an overview of the *NPF* Strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas.**"* [Our Emphasis]
- ***Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport."*** [Our Emphasis]

Furthermore, National Policy Objective 35 states that it is an objective to:

*"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."* [Our Emphasis]

The *NPF* also sets out the following regarding future growth needs in Section 6.6:

***"Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Irelands cities."*** [Our Emphasis]

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in the Greater Dublin Area.

In our professional planning opinion, the *NPF* supports the provision of the proposed mixed-use development through elements of increased density and height at the subject site having regard to the scale of the site, the design of the development which protects existing residential amenity, its proximity to public transport, its provision of local amenities, retail and commercial services and facilities, and the express requirement of national policy to increase densities and the surrounding planning history.

## 5.2.2 National Strategic Outcomes and Objectives

Section 10.3 of the *NPF* identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the *NPF* (to create a shared set of goals for every community across the country) as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A strong Economy supported by Enterprise, Innovation and Skills;
6. High Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A number of key National Policy Objectives ("NPOs") have been identified throughout the *NPF* in order to successfully deliver the 10 No. Strategic Outcomes.

**National Policy Objective 74** states that proposals should "secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes."

The table below sets out how the proposed development will contribute towards achieving the 10 No. National Strategic Outcomes identified in the *NPF* as follows:



## Consistency with National Strategic Outcomes

No.	Objective	How is it Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised site at the centre of Kilternan Village.	Yes
2:	Enhanced Regional Accessibility;	The existing bus services, which connect to Dublin City Centre, will be enhanced as part of Bus Connects, the future bus network proposals providing frequent public transport from both the Enniskerry and Glenamuck Roads.	Yes
3:	Strengthened Rural Economies and Communities;	<p>The site is located in the centre of Kilternan Village with access to a pub/restaurant, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre as well as religious services in the Village such as Kilternan Parish Church and Our Lady of the Wayside Church.</p> <p>The proposed development includes a Neighbourhood Centre and Village Green at the heart of the scheme that promotes community inclusivity.</p>	Yes
4:	Sustainable Mobility;	Promoting active and sustainable transport due to the provision of permeable pedestrian and cycle links through the site, including through the Dingle Way to the future Glenamuck Link Distributor Road and proximity of public transport (incl. the LUAS, bus routes and future Bus Connects links).	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The proposed 487 No. new residential dwellings and Neighbourhood Centre and Village Centre comprising of commercial, retail, childcare, restaurant, café and a community facility will benefit the local economy of Kilternan Village and create a stronger and more vibrant community and economy in the centre of Kilternan.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents with the provision of 4,364 sq m communal open space, in addition to 23,636 sq m of public open space, including a new Village Green for the community. The scheme provides significantly in excess of the minimum public and communal open space requirements and this, in conjunction the pedestrian/cycle links provided through the site, will enhance the amenity of Kilternan Village.	Yes

8:	Transition to a Low Carbon and Climate Resilient Society;	Sustainable modes of transport are encouraged through the pedestrian and cycle links to the surrounding area and the provision of bicycle parking. Green Roofs and SUDS infrastructure have been included within the design of the subject scheme and the scheme will achieve a high energy rating and compliance with building standards.	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources; and	Sustainable modes of transport are encouraged, and sustainable management of water use and waste output is proposed, as detailed in accompanying reports.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	The subject scheme includes a wide variety of services including a creche, and there are schools such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre in Kilternan Village. The 'Social Infrastructure Audit' prepared by Thornton O'Connor Town Planning concludes that <i>"Given the size of the planned development it is judged that the proposed level of retail, community, restaurant/café space, and childcare space will greatly enhance the attractiveness and overall amenity of the village, and is likely to have a positive impact on the quality of services and facilities currently available in the locality."</i>	Yes

A number of key national policy objectives are outlined in the *NPF* in order to successfully achieve the 10 No. Strategic Outcomes outlined above.

We have carried out an assessment of the NPOs identified in the *NPF* and have identified the relevant objectives that are applicable to the proposed development. The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste Environmental Issues; and
- Implementing the *National Planning Framework*.

### 5.2.3 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **National Policy Objective 1b** projects that the population of the Eastern and Midland Region will increase by 490,000 – 540,000 additional people.
- **National Policy Objective 1c** projects an additional 320,000 No. people in employment in the Eastern and Midland Region.
- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a** – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **National Policy Objective 3b** – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **National Policy Objective 4** - Ensure the creation of attractive liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- **National Policy Objective 5** – Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 8** – Aims to ensure the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1.173,000 No. (2016) to 1,408,000 No. (2040).
- **National Policy Objective 11** – In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

The development will facilitate the projected growth in population and persons in employment in the Eastern and Midland Region as identified in NPO 1b and 1c.

A core principle of the *NPF* set out in Section 6.6 states that proposals should:

***"Prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure."*** [Our Emphasis]

The proposed development is located on predominantly undeveloped land in Dublin, served by public transport and is within a short distance of key employment locations such as Kiltarnan Village, Stepside Village, Carrickmines, Enniskerry, Sandyford Business District, Dundrum and links to the M50.



As such the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide for 50% of future population and employment growth with the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The *NPF* recognises that to achieve the targets set out in NPOs 3a and 3b of the framework which relate to the delivery of new homes, housing outputs will undoubtedly necessitate an increase in the provision of apartments. NPO 8 requires targeted population growth for Dublin city and suburbs and the proposed development will contribute towards increasing the population of this area of Dublin.

Furthermore, it is noted in Section 6.6 that *“achieving this level of supply will require increased housing output into the 2020’s to deal with a deficit that has built up since 2010.”*

The Neighbourhood Centre will be high quality, attractive and liveable, and will be a place where the residents and the wider Kiltarnan community will have the opportunity to interact with each other ensuring an integrated community within the scheme and the wider Village. Therefore, it is considered that the proposal will contribute to creating an attractive, liveable, well designed and high-quality urban place as set out in NPO 4 and will ensure the site is sustainably developed contributing towards achieving NPO 5 which aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The proposed scheme involves the development of an existing underutilised site and therefore is fully in accordance with the preferred approach of the *NPF*. The development will encourage social interaction between the residents of the scheme particularly by providing a Neighbourhood Centre, Village Green, a community centre, and a café and plaza space, creating a strong sense of community. The proposed development is consistent with the NPOs set out within this Section.

#### 5.2.4 Current Trends in Tenure and Household Formation in Ireland

The *NPF* acknowledges at Section 4.5 that Ireland’s housing crisis has resulted in:

*“A time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained.”*

The following NPOs respond to the changing nature of household formation and trends in tenure in current planning discourse.

- **National Policy Objective 6** – Regeneration and rejuvenate cities, towns and villages of all types of scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- **National Policy Objective 11** – outlines that 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.
- **National Policy Objective 32** – Details the target of delivering 550,000 No. additional households to 2040.

In accordance with NPOs 6,11 and 32, the development will rejuvenate this site, opening up the site for the public to utilise while also providing much needed housing for the area, which will encourage more people to live in the existing urban footprint whilst also contributing towards generating more jobs and activity within the existing urban area and will contribute towards the target of delivering 550,000 No. additional households to 2040.

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the State consist of three people or less. In terms of changing family size, *"in Dublin city, one, two and three-person households comprise 80 percent of all households."* The document denotes that *"...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it."* [Our Emphasis]

The subject scheme represents proper planning and sustainable development as the site is an underutilised site, located within an existing village and the future residents of the scheme will benefit from the site's close proximity to public transport, employment, services and facilities and the Neighbourhood Centre will enhance the provision of services for Kilternan Village.

The development offers high quality accommodation at a time when the *NPF* acknowledges the constrained urban housing market.

### 5.2.5 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed mixed-use development at the subject site.

- **National Policy Objective 26** – Outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with Planning Policy.
- **National Policy Objective 27** – Aims to 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 the existing and proposed developments and integrating physical activity facilities for all ages.

The subject site is proximate to several important transport facilities in the vicinity. The Ballyogan Wood LUAS stop is located c. 2.3-c. 2.7 km to the north-east (c. 26-31 No. minute walk). Access to the M50 Carrickmines (Exit 15) is located c. 1.9-2.3 km from the subject site.

Dublin Bus route No. 44 serves the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kilternan within the Bus Connects scheme, such as Routes No. 88, L26, L13 and P13, which will all serve Kilternan Village and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area such as University College Dublin.

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines

(Exit 15) and the proposed GDRS scheme which will reduce traffic passing through the village, this makes Kiltiernan Village a hub for activity and increases the area's potential to become a model suburban village.

### 5.2.6 Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered to be most applicable to the mixed-use development at the subject site.

- **National Policy Objective 13** outlines that to achieve well-designed high-quality outcomes performance-based standards will be put in place such as building height and car parking.
- **National Policy Objective 33** states residential development at appropriate scales within sustainable locations will be prioritised.
- **National Policy Objective 35** outlines the requirement to '*increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*'

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the subject site, particularly due to the scheme's high-quality design, siting, layout, mix of dwellings and the provision of a Neighbourhood Centre. The Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment both demonstrate that no significant material impacts will occur as a result of the proposed development. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

In line with NPO 13, the *Development Plan, Apartment Guidelines, 2023*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities, 2007* all set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33, providing an increase in height and density on a small portion of the subject site within an existing settlement, whilst still respecting the context in which it is being provided, which is therefore in accordance with NPO 35.

### 5.2.7 Waste and Environmental Issues

The *NPF* sets out a number of planning policy objectives that specifically relate to Waste and Environmental issues. The following objectives are considered to be most applicable to the proposed development of this planning application:

- **National Policy Objective 52** sets out the planning systems must respond to the environmental challenges and have regard to relevant environmental legislation.



- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce the carbon footprint by integrating climate action into the planning system.
- **National Policy Objective 56** sets out the intentions to sustainably manage waste generation.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure that efficient and sustainable management and conservation of water resources and water services infrastructure.
- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that *'all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate'*.

The subject site is a key underutilised site ideally located for residential and commercial development in the heart of Kiltarnan Village and thus the redevelopment of these underutilised lands is in accordance with the waste and environmental policies outlined above.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The development will support the efficient use of core urban land and will contribute towards reducing the rate of urban sprawl in accordance with NPO 53.

The development and redevelopment of the subject site will provide a population in close proximity to public transport and encourage walking and cycling, in accordance with NPO 54 and NPO 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The proposed development will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area and will contribute to the green infrastructure network (NPO 58), through the provision of an array of new green spaces.

The site is in the centre of Kiltarnan Village with access to a pub/restaurant, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kiltarnan Church of Ireland National School, Our Lady of the Wayside National School and Kiltarnan Adult Education Centre as well as religious services in the Village such as Kiltarnan Parish Church and Our Lady of the Wayside Church.

The proposed scheme provides 854 No. car parking spaces (including 100 No. electric vehicle parking spaces and 2 No. car share spaces) and 823 No. bicycle parking spaces. The area is serviced by bus route Nos. 44, 63 and 118. The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop. The existing bus services will be enhanced as part of Bus Connects, the future bus network proposals providing frequent public transport. The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

The proposed development is supported by the following reports which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues, particularly in accordance with NPO 63, 65 and 75:

- Landscape Design Statement prepared by NMP Landscape Architecture;
- Environmental Impact Assessment Report prepared by Enviroguide Consulting;
- Traffic and Transportation Assessment prepared by AtkinRéalis;
- Appropriate Assessment Screening Report by Scott Cawley;
- Engineering Infrastructure Report & Stormwater Impact Assessment by Roger Mullarkey & Associates;
- Site Specific Flood Risk Assessment by Roger Mullarkey & Associates;
- Arboricultural Assessment by Arborists Associates Limited;
- Acoustic Design Statement by RSK Ireland Limited;
- Climate Change Impact Assessment Report prepared by Enviroguide Consulting;
- Resource and Waste Management Plan by Enviroguide Consulting;
- Construction Environmental Management Plan by Enviroguide Consulting; and
- Operational Waste Management Report prepared by Enviroguide Consulting.

We note that in July 2024, a draft of the 6-year revision of the *NPF* was published. The draft presents revised figures in relation to expected demographic trends and notes that significantly more residential units are needed to meet the demand.

### 5.3 ***Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)***

The *Action Plan for Housing and Homelessness – Rebuilding Ireland (2016)* recognises that a significant increase in new homes is needed and is referenced in the long title to the *Planning and Development (Residential Tenancies) act 2016, as amended*. The Action Plan outlines a 5 No. pillar approach;

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2 and Pillar 3.

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.
- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The publication stipulates in relation to the delivery of housing that:

*"the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time."*

The subject scheme proposes the development of underutilised lands in the heart of Kiltarnan Village. The proposed development will contribute towards addressing the national housing crisis through the provision of 487 No. dwelling units, that will be available to purchase (with the exception of Part V units). The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 50 No. Part V units.

The development is consistent with the policy guidance as set out within the *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)*.

#### 5.4 **Housing for All– a New Housing Plan for Ireland, September 2021 ("Housing for All")**

*Housing for All - a New Housing Plan for Ireland* ("Housing for All") is the Government's housing plan to 2030. It is a multi-annual, multi-billion euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.

The overall objective of *Housing for All* is that:

*"Every citizen in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life."*

Section 3 of *Housing for All* states:

*"An average of 33,000 homes must be provided every year between now and 2030."*

The policy has 4 No. pathways to achieving *Housing for All*:



- Supporting Home Ownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock

The pathways contain actions to be taken to achieve the objectives outlined above.

The subject scheme providing 487 No. residential units in an ideal location in Kilternan Village, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 50 No. Part V units. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

## 5.5 ***Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) ("Building Height Guidelines")***

The *Urban Development and Building Heights: Guidelines for Planning Authorities* ("Building Height Guidelines") established a series of national rules in relation to building heights and new developments. The *Building Height Guidelines* were prepared to work in concert with the objectives of the *NPF* and other national standards for the delivery of sustainable development and compact growth.

The *Building Height Guidelines* are intended to set a more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The *Building Height Guidelines* note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in urban areas, particularly cities and large towns by enhancing both the scale and density of development. Accordingly, the planning process must actively address how this objective will be secured.

Under Specific Planning Policy Requirement (SPPR) 1, Planning Authorities are required to avoid the application of blanket height restrictions; but through the plan-making process, identify areas where increases in height can be pursued:

*"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."*

In accordance with SPPR 1, the *Development Plan* identified a series of areas within which additional height would be supported. These are set out below.

Policy Objective BHS 1 - Increased Height states the following:

*"It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandymount UFP area, UCD and in suitable areas well served by public*

*transport links (i.e. within 1000 metre / 10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metres/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area (NPO 35, SPPR 1 & 3).*

*Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area."*

Policy Objective BHS 2 - Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan) states the following:

*"It is a policy objective to promote and support proposed heights as set out in any approved statutory Local Area Plans and as set out for certain areas in this County Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan area and Dun Laoghaire Urban Framework Plan area).*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above on the basis of placemaking. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area."*

Policy Objective BHS 3 (Building Height in Residual Suburban Areas)<sup>29</sup> of the *Development Plan* states the following:

*"It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as*

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<sup>29</sup> A "residual area", as defined by the Development Plan in the context of height, is noted as being an area "not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective, B, G or GB are termed residual suburban areas."

*those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”*

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3, there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above.

The site does not fall within the definition of BHS 1 and, at present, does not fall within the definition of BHS 2 as the *Kilternan LAP* expired in September 2023 and thus has no statutory basis. The definition of “residual areas” under BHS 3 as described in the *Development Plan* is as follows:

*“A “residual area”, as defined by the Development Plan in the context of height, is noted as being an area “not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective, B, G or GB are termed residual suburban areas”.”*

In relation to the preparation of the new Local Area Plan for the area, the Chief Executives Report on Pre-Draft Consultation was issued in February 2024, but a draft of the new Local Area Plan is not yet available. Therefore, at present it is our opinion that the site does not naturally fall into either the BHS 2 or BHS 3 category, but in our opinion is most suited to the BHS 3 category given that the Applicant has not had sight of a future Draft Local Area Plan at the time of writing this report. In this regard, heights of up to 4 No. storeys partially over a podium/undercroft area have been proposed in one area of the site (eastern lands), with the rest of the site providing heights predominately consisting of 2 to 3 No. storeys, with a 4 No. storey pop-up in the Neighbourhood Centre. Although the height principally does not exceed the 4 No. storeys mentioned within BHS 3 and only provides increased height (due to level difference and provision of an undercroft on the eastern lands), we have provided an assessment of the scheme with Table 5.1 of the *Development Plan* to take the precautionary approach and to demonstrate that the proposed heights are appropriate (please refer to Section 7.1.3).

## 5.6 ***Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2023 (“Apartment Guidelines, 2023”)***

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* in July 2023 (*Apartment Guidelines, 2023*).

The purpose of the *Apartment Guidelines, 2023* published in July 2023 as an update to the *Apartment Guidelines, March 2018 (“Apartment Guidelines, 2018”)*, also updated in December 2020 (*“Apartment Guidelines, 2020”*) (principal changes relate to Shared Living and Build-to-Rent policies) and also updated in December 2022 (*“Apartment Guidelines, 2022”*), (principal changes relate to Build-to-Rent policies) is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. The *Apartment Guidelines, 2023, 2022, 2020 and 2018* build on the content of the *Apartment Guidelines* published in 2015 (*“Apartment Guidelines, 2015”*) particularly in relation to design quality safeguards such as internal space standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.



It is considered that the subject site is located within a 'Peripheral and/or Less Accessible Urban Location' as set out in the *Apartment Guidelines, 2023*, which states:

*"Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:*

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages.*

*The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors."*

The subject site is serviced by bus route Nos. 44, 63 and 118. The site is also located c. 1.9 km - c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance/6-7 No. minute cycle) from the Ballyogan Wood Luas Stop.

It is considered that Kiltiernan Village is ideally suited to provide a density of c. 41 No. units per hectare<sup>30</sup>, particularly since the GDRS has been granted permission by An Bord Pleanála.

*As noted in the Apartment Guidelines, 2023, "the range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors". In this regard, we note that the subject site is located in c. 2.3 km – 2.7 km from the Ballyogan Luas Stop (c. 26 - 31 minute walk or c. 6-7 minute cycle from the site).*

*Bus route Nos. 44, 63 and 118 serve the Kiltiernan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin.*

In terms of meeting future housing need, the *Apartment Guidelines, 2023* set out at Section 2.6 that:

*"demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2- person, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type."*

Furthermore, the 2016 Census indicates that:

*"if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2- person homes."*

*The Apartment Guidelines, 2023 recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand.*

<sup>30</sup> See Section 5.7 below for details on how the density has been calculated in accordance with the *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024*.

The proposed development will consist of a total of 487 No. residential units comprising 196 No. houses, 201 No. duplex units, and 90 No. apartments comprising 53 No. 1 bed units (11%), 150 No. 2 bed units (31%), 236 No. 3 bed units (48%) and 48 No. 4 bed units (10%). The subject site at Kiltarnan Village is suited for the proposed development and will appropriately densify this village centre site with a wide range of dwelling units (and a Neighbourhood Centre), in accordance with the *Apartment Guidelines, 2023*. In addition, it is highlighted that the development provides 50 No. Part V units, in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

### Specific Planning Policy Requirement 1

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

When the proposed houses are excluded from the unit mix, there are 291 No. apartments and duplexes provided, with 53 No. 1 bed units (18%), 112 No. 2 bed units (39%) and 126 No. 3 bed units (43%), in accordance with SPPR 1.

### Specific Planning Policy Requirement 2

*"For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:*

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development."*

Not Applicable

### Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq m
- 1-bedroom apartment (2 persons) 45 sq m
- 2-bedroom apartment (4 persons) 73 sq m
- 3-bedroom apartment (5 persons) 90 sq m

All units meet, and in some cases, exceed the minimum apartment floor areas set out in SPPR3.

#### Specific Planning Policy Requirement 4

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

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) *In suburban or intermediate locations, it is an objective that **there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."* [Our Emphasis]

In the subject scheme, 83% of the apartments and duplexes will be dual aspect, which is well in excess of the minimum requirement set out in SPPR<sub>4</sub> of the *Apartment Guidelines, 2023*. This demonstrates the high-quality design of the subject scheme.

#### Specific Planning Policy Requirement 5

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

The ground floor of the commercial units is provided with floor to ceiling heights of 3.3 – 3.75 metres, the apartment blocks are provided with a minimum ground level floor to ceiling height of 3.3 metres and upper levels provide heights of 2.775 metres. The duplexes all meet minimum requirements of 2.7 metres with the majority providing ground floor to ceiling heights of 2.925 metres. All upper levels of the duplexes have been designed with floor to ceiling heights of 2.585 – 2.7 metres, which is considered good practice.

The proposal is therefore fully in compliance with SPPR 5 of the *Apartment Guidelines, 2023*.

#### Specific Planning Policy Requirement 6

*"A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha."*

Apartment Blocks 1 and 2 provide 8 No. units per core and Apartment Block 3 provides 7 No. units per core, which is therefore in accordance with SPPR 6.

#### Minimum Aggregate Area of Living/Dining/Kitchen Area and Minimum Widths for Main Living/Dining Rooms



The *Apartment Guidelines, 2023* outline a requirement for minimum aggregate area of living/dining/kitchen space as follows:

Unit Type	Minimum Living/Kitchen/ Dining Area Required	Width of Living/Dining Room Required
Studio	30 sq m	4 metres
One Bedroom	23 sq m	3.3 metres
Two Bedroom (3 No. person)	28 sq m	3.6 metres
Two Bedroom (4 No. person)	30 sq m	3.6 metres
Three Bedroom	34 sq m	3.8 metres

We have been advised by MCORM Architects that each of the units have been designed in accordance with the standards for the minimum bedroom floor areas and widths outlined in the *Apartment Guidelines, 2023*. Please refer to the Housing Quality Assessment and architectural drawings enclosed separately.

### Minimum Bedroom Floor Areas/Widths

The *Apartment Guidelines, 2023* outline the requirement for minimum bedroom floor areas and widths as follows:

Unit Type	Minimum Floor Area	Minimum Width
Studio	30 sq m	4 metres
Single Bedroom	7.1 sq m	2.1 metres
Double Bedroom	11.4 sq m	2.8 metres
Twin Bedroom	13 sq m	2.8 metres

We have been advised by MCORM Architects that all units have been designed in accordance with the standards for the minimum bedroom floor areas and widths outlined in the *Apartment Guidelines, 2023*.

### Minimum Aggregate Bedroom Floor Areas

The *Apartment Guidelines, 2023* outline the requirement for minimum aggregate bedroom floor areas as follows:

Unit Type	Minimum Aggregate Floor Area
One Bedroom	11.4 sq m
Two Bedroom (3 No. person)	13 + 7.1 sq m = 20.1 sq m
Two Bedroom (4 No. person)	11.4 + 13 sq m = 24.4 sq m
Three Bedroom	11.4 + 13 + 7.1 sq m = 31.5 sq m

Each of the units have been designed in accordance with the standards for the minimum aggregate bedroom floor areas outlined in the *Apartment Guidelines, 2023*.

### Minimum Storage Space Requirements

The *Apartment Guidelines, 2023* outline the requirement for minimum storage space as follows:

Unit Type	Minimum Storage Space
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Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedrooms or more	9 sq m

All units will meet, and exceed in some cases, the internal storage standards. Please refer to the Housing Quality Assessment Tables prepared by MCORM Architects.

### Private Open Space

The *Apartment Guidelines, 2023* outline a requirement for private open space per unit as follows:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

Private open space has been provided for each of the proposed apartments and duplexes in line with the requirements outlined in the *Apartment Guidelines, 2023* in the form of balconies and terraces. In many cases the private open space provision for the proposed apartments and duplexes exceeds the minimum standards outlined in *Apartment Guidelines, 2023*.

### Communal Amenity Space

The *Apartment Guidelines, 2023* outline the following standards for communal amenity space:

Unit Type	No. of Units	Communal Amenity Space Requirement Per Unit	Total Communal Space Required
Studio	-	4 sq m	-
One Bedroom	53	5 sq m	265 sq m
Two Bedroom (4 No. Person)	112	7 sq m	784 sq m
Three Bedroom	126	9 sq m	1,134 sq m
<b>Total:</b>	<b>291 No. (apartments and duplexes)</b>		<b>2,183 sq m</b>

Based on the composition of the proposed 291 No. apartments and duplexes, the subject scheme has a requirement of 2,183 sq m of communal amenity space to meet the minimum standards outlined in the *Apartment Guidelines, 2023*.

The subject scheme includes 4,364 sq m of communal amenity space designed by NMP Landscape Architecture, which significantly exceeds the minimum requirement.



## 5.7 Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024

*Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities* ("Compact Growth Guidelines") were adopted in January 2024, replacing the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009). Their purpose is to promote and accommodate more sustainable development (residential in particular), setting density standards and a suite of design requirements, such as those relating to parking and public open space.

As with the *Apartment Guidelines, 2023*, the *Compact Growth Guidelines* define a series of Specific Planning Policy Requirements (SPPRs), as well as a suite of 'Policies and Objectives'; the rest of this section lists these and provide responses to demonstrate the proposed development's compliance with same.

### **SPPR 1 (Separation Distances):**

*"It is a specific planning policy requirement of these Guidelines that statutory development plans\* shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. 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.*

*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.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

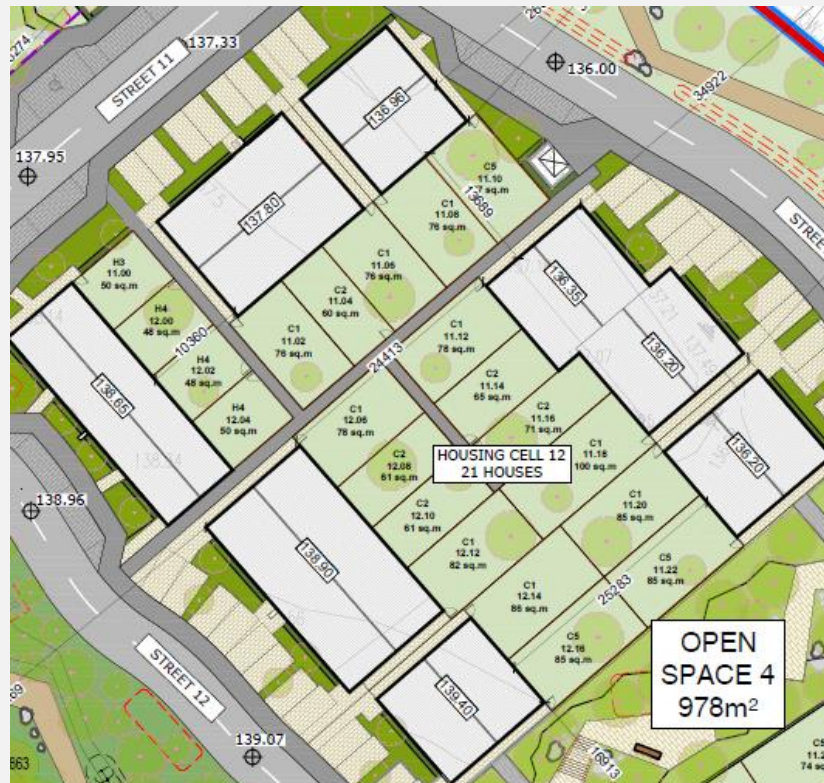
*\* "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.*

*\*\* "Refer to definition in Appendix A: Glossary of Terms." The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms."*

**As a general rule, SPPR 1 ultimately requires a separation distance of at least 16 metres between opposing windows of habitable rooms at the rear and side of dwellings at above ground floor level. No minimum separation distance applies at ground floor levels or to the front of dwellings.**

The approach to the design of the proposed development has been to protect and respect residential amenity, whilst aligning with the standard set by the Guidelines. Throughout the development, the minimum separation of 16 metres has been exceeded and this is evident on the drawings prepared by MCORM Architects.

The proposed development provides large separation distances between properties across the site. See examples below which provide separation distances of between c. 18 metres and 38 metres across the site:











Therefore, the proposed development complies with this SPPR and the scheme will enjoy a high level of amenity.

#### SPPR 2 (Minimum Private Open Space Standards for Houses):

*"It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- 1 bed house 20 sq.m*
- 2 bed house 30 sq.m*
- 3 bed house 40 sq.m*
- 4 bed + house 50 sq.m*

*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.*

*Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).*

*For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

SPPR 2 requires houses to be designed to comply with the minimum private open space standards set out above, but that apartments should comply with the private amenity space standards of the *Apartment Guidelines, 2023* (which they do).

In all instances, the private open space provided for each house exceeds the minimum standards, as they have been designed in accordance with the *Development Plan* standards which require larger spaces when compared to the *Compact Growth Guidelines*.

### **SPPR 3 (Car Parking):**

*"It is a specific planning policy requirement of these Guidelines that:*

- (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.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

*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 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.*

*This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."*

Based on the definitions provided in Tables 3.1, 3.2 and 3.8 of the Guidelines, in our opinion, the site falls within the "intermediate and peripheral locations" categorisation, similar to the categorisation of the site as a 'Peripheral and/or Less Accessible Urban Location' as set out in the *Apartment Guidelines, 2023* (detailed in the previous section).

Therefore, the Guidelines set a maximum car parking rate of 2 No. spaces per dwelling. Based on the provision of 487 No. residential units, a maximum of 974 No. residential car parking spaces could be provided at the site. The scheme provides a total of 767 No. residential car parking spaces which is below the maximum standards and is acceptable in our opinion (additional parking spaces provided for the non-residential elements – 87 No.).

The rates of car parking provision are proposed as follows for the residential element of the scheme (average depending on unit size):

**Houses** – 1.8 No. spaces per unit

**Apartments** – 1.4 No. spaces per unit

**Duplexes** – 1.3 No. spaces per unit

As set out above, the rate of provision does not exceed the maximum standards set by the Guidelines. This provision includes 2 No. car share spaces and 28 No. accessible spaces throughout the site which does not materially impact on the proposed parking ratio for the development.

#### **SPPR 4 (Cycle Parking and Storage):**

*"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:*

- (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.*
- (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."*

SPPR 4 requires the provision of at least 1 No. cycle parking space per bedroom, plus visitor parking (quantum not specified). The houses have all been designed with adequate and accessible private amenity spaces, where safe and secure cycle parking can be provided.

As detailed in Section 6.3 of the 'Traffic and Transport Assessment' by AtkinsRéalis, 655 No. bicycle parking spaces are required under SPPR4. Please see the table extracted below completed by AtkinsRéalis:



**Table 6-6 - Sustainable Residential Development and Compact Settlements Cycle Parking Standards**

Type	Units	Spaces per Unit	Minimum Spaces
1 Bed Apartment	35	1	35
2 Bed Apartment	16	2	32
3 Bed Apartment	39	3	117
<b>Apartments Total</b>	<b>90</b>		<b>184</b>
1 Bed Duplex	18	1	18
2 Bed Duplex	96	2	192
3 Bed Duplex	87	3	261
<b>Duplex Total</b>	<b>201</b>		<b>471</b>
<b>Overall Total</b>	<b>291</b>		<b>655</b>

The scheme provides 719 No. residential bicycle parking spaces which exceeds the requirements set out in SPPR 4 and includes appropriate provision for visitors (64 No.).

### Policy and Objective 3.1 (Densities)

*"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."*

Informed by this, we are of the opinion that the subject site is within a 'City – Suburban/Urban Extension' location, as detailed in Table 3.1 of the Guidelines:

*"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)."*

Consequently, a 'general' density within the range of 40–80 dph should be achieved, but with scope for greater densities in appropriate locations.

Furthermore, Appendix B of the *Compact Growth Guidelines* sets out how net residential density should be measured. Firstly, Table 1 of the *Compact Growth Guidelines* sets out the following inclusions and exclusions for calculating the net site area:

Net Site Area Includes	Net Site Area Excludes
<ul style="list-style-type: none"> <li>Local Streets as defined by Section 3.2.1 DMURS.</li> <li>Private and semi-private open space.</li> <li>Car parking, bicycle parking and other storage areas.</li> <li>Local parks such as neighbourhood and pocket parks or squares and plaza's</li> <li>All areas of incidental open space and landscaping.</li> </ul>	<ul style="list-style-type: none"> <li>Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.</li> <li>Lands used for commercial development (inc. retail, leisure and entertainment).</li> <li>Lands for primary schools, churches and other community services and facilities.</li> <li>Larger, Regional or District Parks, Wayleaves or rights of way.</li> </ul> <p>Other areas of land that cannot be developed due to environmental sensitivities, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

Secondly, the Appendix sets out details on how to calculate the density based on the net site area:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwelling by reduced site area.

The Appendix also provides a worked example to demonstrate how this calculation should be applied:

#### *Required Information*

- Net Site Area = 1.7 ha
- Overall GFA = 31,400 sq m
- Residential GFA = 24,600 sq m
- Non-residential GFA = 6,800 sq m
- Number of residential units = 188 No.

#### *Calculation*

- Residential GFA as a portion of development =  $24,600/31,400 = 78.3\%$
- Site area for density purposes =  $(1.7\text{ha} \times 78.3\%) = 1.33\text{ha}$
- Residential density =  $188/1.33 = 141 \text{ dph (net)}$

This calculation has been applied to the subject development as follows:

#### *Required Information*

- Net Site Area<sup>31</sup> = 13.2 ha
- Overall GFA<sup>32</sup> = 57,431 sq. metres

<sup>31</sup>Excludes external road, drainage and junction works, and also excludes the internal link street providing from Enniskerry Road to the future GLDR. Please refer to the HQA prepared by MCORM Architects for further details and also Figure 12 of the 'Architectural and Urban Design Statement' prepared by MCORM Architects.

<sup>32</sup> Excludes plant, stores, substations, undercroft parking etc.

- Residential GFA = 51,306 sq. metres
- Non-residential GFA = 6,125 sq. metres
- Number of residential units = 487

#### Calculation

- Residential GFA as a portion of development =  $51,306/57,431 = 89\%$
- Site area for density purposes =  $(13.2 \text{ ha} \times 89\%) = 11.8 \text{ ha}$
- Residential density =  $487/11.8 = 41.27 \text{ dph (net)}$

Therefore, the subject development adheres to the density requirements pertaining to the subject site by providing 41.26 units per hectare on a site designated for 40 – 80 units per hectare.

#### Policy and Objective 4.1 (DMURS)

*"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."*

The proposed development has incorporated the principles, approaches and standards of the *Design Manual for Urban Roads and Streets* (DMURS) in its design. This is evident in the drawings and *DMURS Statement* prepared by AtkinsRéalis.

#### Policy and Objective 4.2 (Quality Urban Design and Placemaking)

*"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."*

The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the Guidelines fall under the headings of:

- **"Sustainable and Efficient Movement"**  
*"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."*
- **"Mix and Distribution of Uses"**  
*"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."*
- **"Green and Blue Infrastructure"**  
*"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."*



- **"Responsive Built Form"**

*"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."*

**"Sustainable and Efficient Movement"**

The layout of the development proposes an array of connections including vehicular, pedestrian and cyclist links. Therefore, the site will be well connected and accessible by sustainable modes. The site prioritises pedestrians to allow for safe and easy access, egress and internal movement. Ample cycle parking is proposed to promote and accommodate safe and sustainable active modes of transport. The non-residential uses will provide services within walking distance for the proposed residential units.

**"Mix and Distribution of Uses"**

The site is zoned for Residential and Neighbourhood Centre uses, and the proposed development aligns with these zoning objectives.

A diverse range of unit types and sizes will also be provided that can facilitate greater housing choice. The non-residential uses including anchor retail, retail/commercial, café, restaurant, creche and community centre provides a significant choice of services in proximity to residential units.

**"Green and Blue Infrastructure"** (We note that later in the Guidelines **"Public Open Space"** is included as an apparent fifth key indicator, so is incorporated below.)

Planting and landscaping are an integral aspect of the proposed development. A carefully considered layout will achieve an attractive and ecologically beneficial proposal, supportive of local biodiversity and trees have been retained where possible. Significant areas of public and communal open spaces will provide new areas within the village core for public and residents to utilise.

Proposed green roofs will also play an important role in surface water management, whilst also supporting biodiversity.

**"Responsive Built Form"**

The built-form of the development positively and respectfully responds to the site shape and context of the site. The hub of activity proposed fronting Enniskerry Road will enhance the village core and will animate the streetscape along this frontage. The scheme provides a coherent street network with permeable link through the site which will enhance legibility for the village.

**Policy and Objective 5.1 (Public Open Space)**

*"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.*

*In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.*

*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.*

*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."*

This Policy and Objective requires statutory plans to set minimum public open space standards generally in the range of 10–15% of the net site area. As the *Development Plan* already prescribes a minimum public open space requirement of 15%, this is deemed to be the quantitative standard that the proposed development must be met. The proposed development provides 23,636 sq m of public open space on a net site area of 13.2 Hectares (132,131 sq m). This represents a provision of 18% public open space which exceeds the requirement for the site (15% = 19,819.65 sq m). The Design Team have taken a precautionary approach and have excluded civic spaces / incidental green spaces etc. from the public open space provision. Even after these spaces have been excluded, the public open space provision still exceeds the requirements by c. 3,819 sq m, providing some 23,636 sq m in total or more than 2.36 Ha. The scheme will thus provide a wide range of open spaces for the public to enjoy which will positively contribute to the village of Kiltiernan.

## 5.8 ***Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)***

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* outline a number of key principles which are of relevance to the subject scheme:

*"The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:*

- *Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*

- *Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;*
- *Pointing the way to cost effective options for housing design that go beyond minimum codes and standards; promoting higher standards of environmental performance and durability in housing construction;*
- *Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and providing homes and communities that may be easily managed and maintained."*

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for an increase in heights in appropriate locations i.e. on the eastern portion of the lands. In addition, the 4 No. storey Neighbourhood Centre will front the new Village Green.

The scheme will be provided with high quality materials as described in the 'Architectural and Urban Design Statement' prepared by MCORM Architects:

*"The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.*

*Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.*

*The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development."*

The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality houses and apartments, open spaces and commercial floorspace, which ensures that first-rate living conditions will be developed. In addition, the design of the subject scheme has evolved through a creative process, in conjunction with the results of the Daylight and Sunlight Assessment to ensure an attractive living environment for future residents.

## 5.9 **Retail Planning Guidelines for Planning Authorities (2012)**

The subject site includes a 'Neighbourhood Centre' designation as denoted on the zoning map of the *Development Plan*.

The *Retail Planning Guidelines for Planning Authorities (2012)* ("Retail Planning Guidelines") notes the following definitions in relation to Neighbourhood Centres:



**"Local Centre or Neighbourhood Centre**

*Comprise a small group of shops, typically comprising newsagent, small supermarket/ general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population...*

**Centre**

*For the purposes of these guidelines, a centre refers to a city or town centre and can also, refer to the centre of a district or neighbourhood centre which has been identified in the settlement hierarchy of a development plan."*

Section 4.11.6 'Local Retail Units' of the *Retail Planning Guidelines* states the:

*"Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport."*

The proposed development includes a Neighbourhood Centre, which is provided in the centre of the village on appropriately zoned lands, providing a range of services to serve the surrounding area including an anchor retail store (c. 1,310 sq m), retail/commercial units (c. 3,284 sq m), a creche (c. 691 sq m), café (c. 326 sq m), and a community facility (c. 332 sq m). This Centre will perform an important function in the area in accordance with Section 4.11.6 of the *Retail Planning Guidelines*, and we note that these non-residential areas have been provided to comply with the requirements of the Braniff Report (as instructed by the Planning Authority under the Phase 1 application – DLRCC Reg. Ref. D23A/0616 – recently granted permission). The services provided within the Neighbourhood Centre will cater for the elderly, persons with mobility impairments, families with small children and those without access to private transport.

In addition, a *Social Infrastructure Audit* has been prepared and is enclosed with this planning application. The Report concludes that:

*"Given the size of the planned development it is judged that the proposed level of retail, community, restaurant/café space, and childcare space will greatly enhance the attractiveness and overall amenity of the village, and is likely to have a positive impact on the quality of services and facilities currently available in the locality."*

It is considered that the provision of non-residential floorspace in the proposed Neighbourhood Centre is appropriate and will adequately serve the existing and future population in the Kilternan area. Overall, the additional services provided within the Neighbourhood Centre will be a significant benefit for the future residents of the proposed development and the wider Kilternan community.

## 5.10 *Design Manual for Urban Roads and Streets (2019)*

The *Design Manual for Urban Roads and Streets (2019)* ('DMURS') sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

### 5.10.1 Policy Background

DMURS references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

- (i) 'To reduce overall travel demand;
- (ii) To maximise the efficiency of the transport network;
- (iii) To reduce reliance on fossil fuels;
- (iv) To reduce transport emissions; and
- (v) To improve accessibility to public transport'.

The scheme promotes sustainable modes of transport through its sustainable locations the core of Kiltarnan Village and through the provision of permeable links such as the Dingle Way and linkages to surrounding developments etc.

The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future a New Transport Policy for Ireland 2009 – 2020*.

### 5.10.2 Site Layout and Legibility

The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area and will open up the site to serve the local community. In addition, the subject scheme includes the provision of 23,636 sq m of public open space and 4,364 sq m of communal open space.

The proposed high-quality designed layout of the scheme by MCORM Architects will ensure that the scheme will sit comfortably within its immediate context through a modulation of scale and character throughout the site and will make a positive contribution to legibility and permeability for Kiltarnan. We note that the development has been designed in accordance with DMURS, as demonstrated in the enclosed *DMURS Statement* prepared by AtkinsRéalis.

### 5.10.3 Sustainable Transport

The subject site is considered eminently suitable for development given the site's location in the heart of Kiltarnan Village. Permission has been granted for other residential developments in Kiltarnan and it is considered that the subject site is even more sustainable than some of the granted development sites due to its location in the centre of the village.

The DMURS publication references that the Smart Travel document includes a "*vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips.*"

The proposed scheme provides for 823 No. bicycle parking spaces for the apartments/duplexes ensuring that sustainable modes of transport are encouraged. In addition, the houses will store bicycles in curtilage.

As established in the above commentary, it has been demonstrated that the proposed mixed-use scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2019)*.

The *DMURS Statement* prepared by AtkinsRéalis notes the scheme's compliance with DMURS and sets out specific attributes of the scheme design which contribute to achieving this DMURS objective.

#### 5.11 ***The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)***

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The *Site Specific Flood Risk Assessment* by Roger Mullarkey and Associates concludes the following key points:

*"As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.*

*In accordance with the above noted Guidelines, as sequential staged approach was adopted in assessing the flood risk for the subject development.*



*It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.*

*It is concluded that a mixed residential and commercial development is appropriate on the subject lands.*

*It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.*

*Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding."*

Thus, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

#### 5.12 ***Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016***

The *Guidelines for Planning Authorities on Childcare Facilities (2001)* ("Childcare Guidelines, 2001") sets out that:

*"Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate."*

The *Childcare Guidelines, 2001* further state:

*"The Planning and Development Act, 2000, makes it a mandatory requirement on planning authorities to include in their Development Plan objectives on the provision of services for the community, including creches and other childcare facilities."*

The objectives of the *Childcare Guidelines, 2001* are to:

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
  - Residential areas;
  - Places of employment;
  - Educational establishments;
  - City and town centres, neighbourhood and district centres;
  - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

The *Childcare Guidelines, 2001* identify appropriate locations for childcare facilities as identified below:

- New communities/Larger new housing developments - *'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.'*
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working – *facilitating safe and efficient journeys to/from the workplace of parents/guardians.*
- In the vicinity of schools – facilitating parents dropping off school-going children and children attending childcare facilities on route to their place of employment;
- Neighbourhood, District and Town Centres – combating competitive pressure from larger commercial areas.
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.

The *Childcare Guidelines, 2001* stipulate that Planning Authorities should require one childcare facility (providing for a minimum 20 childcare places) per approximately 75 No. dwellings. However as noted above, a childcare facility does not need to be provided if there are significant reasons relating to the development consisting of single bed apartments or where adequate childcare facilities exist in adjoining developments. It is also noted that the *Apartment Guidelines, 2023* state the following:

*"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."*

The *Social Infrastructure Audit* enclosed separately concludes the following in relation to childcare spaces:

*"While it is anticipated that 48 No. childcare spaces could be expected from the proposed development, the sizing of the proposed childcare facility has been determined based on the wider childcare deficit/requirements and the need to deliver a viably-sized operational space."*

*The proposed development incorporates a c. 691 sq m childcare facility consistent with the requirements of S.I. No. 632/2016 - Child Care Act 1991 (Early Years Services) (Amendment) Regulations 2016. It is judged that given the level of existing childcare provision in the local area and the need to deliver new, modern, purpose-built premises, that the inclusion of this space to cater for 131 No. children is suitable."*

The proposed development will provide a creche<sup>33</sup> (c. 691 sq m) within the ground floor of the Neighbourhood Centre and will cater for 131 No. children. This crèche will contain 10 No. classrooms and includes a dedicated open space area for staff and children to utilise. The *Child Care Act 1991 (Early Years Services) Regulations 2016* sets out the following floor areas for various age groups, which has been complied with in the design of the proposed creche.

<sup>33</sup> This has already been granted in the Phase 1 Planning Application.

(1)	(2) AGE RANGE	(3) CLEAR FLOOR SPACE
1.	0-1 year	3.5 square metres
2.	1 — 2 years	2.8 square metres
3.	2 — 3 years	2.35 square metres
4.	3 — 6 years	2.3 square metres

### 5.13 **Part V of the Planning and Development Act**

*Part V of the Planning and Development Act: Guidelines issued by the Minister for Housing, Planning, Community and Local Government* details the application of Part V of the *Planning and Development Act 2000* (as amended) and provides instruction on how to achieve the delivery of social housing as part of residential schemes.

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we note that 10% Part V provision applies to 97% of the lands, which were purchased by the Applicant on 22<sup>nd</sup> December 2020. The remaining 3% of the lands (the former Kiltarnan Country Market site) were purchased post August 2021 and therefore a 20% Part V provision is applicable to 3% of the total land. The total development provides 487 No. residential units which can be broken down as follows:

- 97% of 487 No. units = 47 No. units
- 3% of 487 No. units = 3 No. units

Therefore, some 50 No. Part V units are required, which have been provided as part of the proposed development (8 No. 1 bedroom units, 23 No. 2 bedroom units and 19 No. 3-bedroom units).

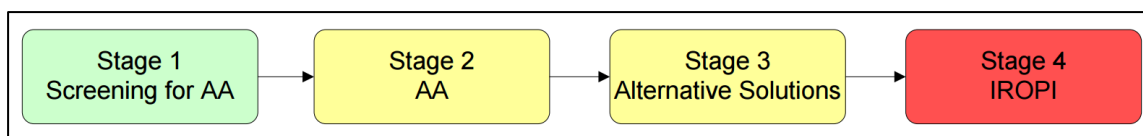
### 5.14 **Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities**

The undertaking of Appropriate Assessment (AA) is to ensure the protection and integrity of statutorily protected environments/sites. These sites are protected by the Birds Directive (2009/147/EC (as amended)) and the Habitats Directive (1992/43/EEC (as amended)), and by Natura 2000. In Ireland, such areas are identified as: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). National guidance in *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009) states that:

*"AA is an impact assessment process that fits within the decision-making framework", adding that while "the requirement [to undertake AA] is not to prove what the impacts and effects will be[, if any], but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result".*

As shown in the figure below, there are 4 No. principal stages to AA. For the development at the subject site, the enclosed *Appropriate Assessment Screening Report* screened out at Stage 1 the prospect that the proposal would not have *"any significant effects on any European sites"* (refer to the standalone report). For full details, please refer to Scott Cawley's *Appropriate Assessment Screening Report*, included under separate cover.





**Figure 5.2: The 4 No. Stages of the Appropriate Assessment Process**

**Source:** *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009)

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

## 6.0 STATEMENT OF CONSISTENCY - REGIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within the *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*.

### 6.1 *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*

The *Regional Spatial and Economic Strategy* ("RSES") for the Eastern and Midlands Regional Assembly comprises a number of core Regional Policy Objectives which coincide with the National Planning Framework ("NPF"). The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

The RSES includes various Regional Policy Objectives ("RPO") and the relevant RPOs are discussed in this section.

Under RPO 4.3, 'Consolidation and Re-intensification' the following objective is stated:

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

The subject scheme will provide 487 No. residential units and a Neighbourhood Centre at an underutilised strategic site in the centre of Kiltiernan Village, in accordance with RPO 4.3. In addition, as noted earlier in this report, it is expected that the GDRS will have completed construction in Q1 2026 and the first phase of the proposed development is predicted to be fully constructed by July 2026, which lines up with the conclusion of the GDRS. The scheme has allowed for and considered the future GLDR (part of the GDRS) that traverses the subject lands. Bus Connects improvements will also be delivered in the Village. It is our opinion that the development will result in the appropriate intensification of this sustainable core village site.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES states the following:

- RPO 5.4: *"Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines', and 'Urban Development and Building Heights Guidelines for Planning Authorities'."*

As stated previously in this Statement, the proposed development fully responds to the National Planning Policy, in particular *Sustainable Urban Housing; Design Standards for New Apartments, 2023* and *the Urban Development and Building Heights Guidelines for Planning Authorities, 2018*.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES notes the following objective RPO 5.5:

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

The subject site is contained within an established neighbourhood in Kiltarnan Village.

It is our professional opinion that the proposed development provides an appropriate design response that will consolidate and contribute to the surrounding residential land uses as per RPO 5.5. The proposed development represents consolidated growth on an underutilised site in a prominent and growing area of County Dublin.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*"Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable."* [Our Emphasis]

The proposed development is located on appropriately positioned lands in the heart of Kiltarnan Village.

The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in the village centre preventing urban sprawl. Appropriately located residential accommodation within Dublin is important to the continued growth and maintenance of Ireland's response to the evolving needs of the modern, mobile workforce.

Under Section 8.1 the RSES states the following with regard to integrating land use and transport planning:

*"The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns."*

The subject development contributes to consolidated growth and the reduction in carbon emissions as it seeks to encourage future residents to avail of sustainable modes of transport through the provision of various permeable links through the site and the provision of 823 No. bicycle parking spaces for example.

The proposed landscaping and planting will help maintain a high standard of natural and green infrastructure within an intensified and more dense mixed-use setting. The open spaces provided within the development will also significantly enhance the green infrastructure of the area.

Therefore, the subject development contributes to consolidated growth, towards the reduction in carbon emissions and represents a sustainable settlement pattern and is thus in accordance with Section 8.1.

Under Section 8.2, the *RSES* discusses responses to urban sprawl and justification for the move towards compact growth:

*"The Strategy aims to provide a spatial framework **to promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time."* [Our Emphasis]

The subject development seeks to provide a sustainable mixed-use development, which is well located in the centre of Kiltarnan Village.

The development promotes compact growth in accordance with Section 8.2, especially as there are some recently granted developments in Kiltarnan, that are located further from the Village Core.

Additionally, the provision of a significant quantum of open space and a Neighbourhood Centre aide in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community.

The *RSES* Objective RPO 9.4 states that in relation to new apartment developments:

*"Design standards for new apartment developments **should encourage a wider demographic profile which actively includes families and an ageing population.**"* [Our Emphasis]

It is our opinion that there is a significant opportunity to densify this site with a mix of one, two, three and four bedroom units, which will appropriately serve the demographic profile of the area, and as such the scheme will cater for a wide cohort of persons.

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant Regional Policies.



## 7.0 STATEMENT OF CONSISTENCY - LOCAL PLANNING POLICY CONTEXT

This section will demonstrate that the proposed development has been designed in accordance with Local Policy as set out within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* ("Development Plan"). Furthermore, we note that the *Kilternan Local Area Plan 2013-2019* [previously extended to September 2023] ("*Kilternan LAP*") has now expired and thus no longer applies to the subject site. However, we have set out below that the subject scheme is predominately designed in accordance with the parameters of the *Kilternan LAP*.

### 7.1 *Dún Laoghaire-Rathdown County Development Plan 2022-2028*

#### 7.1.1 Core Strategy

The Core Strategy Map outlined in Figure 2.9 of the *Development Plan* demonstrates that Kilternan is designated as a 'New Residential Community':

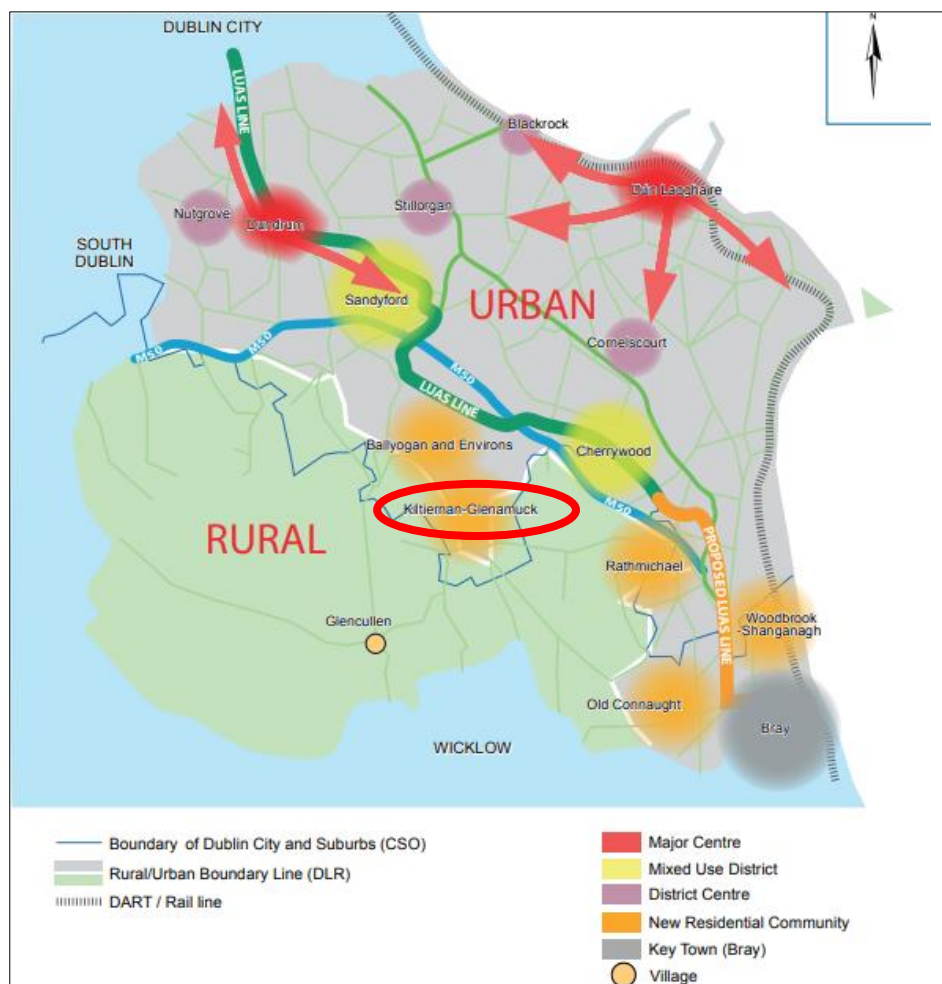


Figure 7.1: Core Strategy Map of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* (Figure 2.9) with Kilternan Circled in Red

(Source: Figure 2.9 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2024)

Therefore, the proposed development of 487 No. residential units with a new Neighbourhood Centre reflects the aspirations set out in the Core Strategy Map by providing a new residential

community within Kiltarnan Village with the services and facilities, which will provide a commercial hub for the community. The proposed scheme provides a sustainable solution for the growing population, by providing a medium-density development on a strategic site within a growing and vibrant suburban village.

### 7.1.2 Zoning

The subject site is zoned as both 'Objective A' and 'Objective NC' in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, where the stated objectives are:

*Objective A: To provide residential development and improve residential amenity while protecting the existing residential amenities.*

*Objective NC: To protect, provide for and/or improve mixed-use neighbourhood centre facilities.*

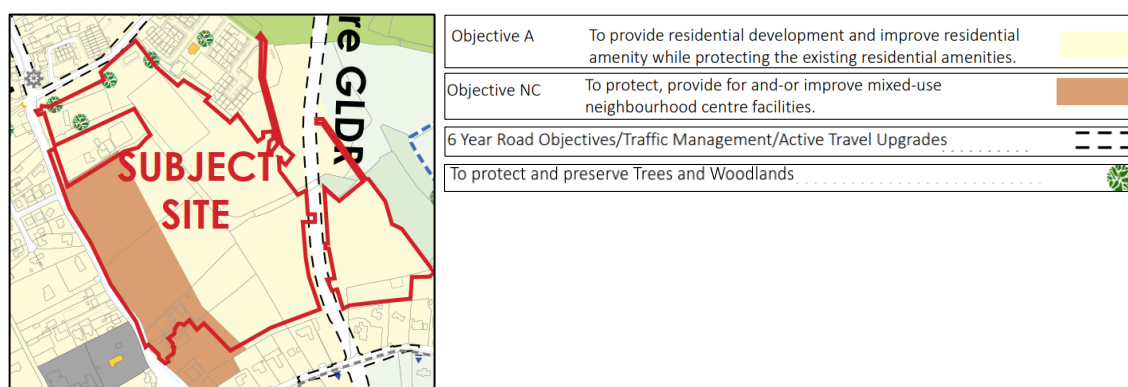


Figure 7.2: Zoning of the Subject Site (Indicatively Outlined in Red)

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, annotated by MCORM Architects, 2024)

The proposed development includes the following uses which are all either permitted in principle or open for consideration under the zoning objectives:

- 487 No. residential units
- anchor retail store (c. 1,310 sq m)
- retail/commercial (c. 3,284 sq m)<sup>34</sup>
- creche (c. 691 sq m)
- café (c. 326 sq m), and;
- community facility (c. 332 sq m).

The Objective 'A' lands contains residential units, which are permitted in principle. The Objective 'NC' lands contains the anchor retail store, retail/commercial space, creche, café, community facility and residential units, which are all either permitted in principle or open for consideration.

<sup>34</sup> The specific commercial/retail uses for these areas will be finalised once a suitable tenant has been secured.

**Table 13.1.2**

<b>ZONING OBJECTIVE 'A'</b>	
To provide residential development and improve residential amenity while protecting the existing residential amenities.	
<b>Permitted in Principle</b>	
Assisted Living Accommodation, Community Facility <sup>a</sup> , Childcare Service <sup>a</sup> , Doctor/Dentist etc. <sup>a</sup> , Education <sup>a</sup> , Health Centre/ Healthcare Facility <sup>a</sup> , Open Space, Public Services <b>Residential</b> , Residential Institution, Travellers Accommodation.	
<b>Open For Consideration</b>	
Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark <sup>b</sup> , Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry <sup>c</sup> , Offices less than 200sq.m. <sup>c</sup> , Offices in excess of 200 sq.m. <sup>d</sup> , Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery.	
<b>a:</b>	Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'.
<b>b:</b>	Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.
<b>c:</b>	less than 200sq.m.
<b>d:</b>	Only applies to A zoned lands subject to Specific Local Objective 122.

**Table 13.1.12**

<b>ZONING OBJECTIVE 'NC'</b>	
'To protect, provide for and/or improve mixed-use neighbourhood centre facilities'.	
<b>Permitted In Principle</b>	
Advertisements and Advertising Structures, Assisted Living Accommodation, Betting Office, Carpark, <b>Community Facility</b> , Craft Centre/Craft Shop, <b>Childcare Service</b> , Civic Use Cultural Use, Doctor/ Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre / Healthcare Facility, <b>Offices less than 300 sq.m.</b> , <b>Open Space</b> , Public House, Public Services, <b>Residential</b> , Residential Institution, Restaurant, Service Garage, <b>Shop-Neighbourhood</b> , Sports Facility, Tea Room/ Café, Veterinary Surgery.	
<b>Open For Consideration</b>	
Aparthotel, Cash and Carry/Wholesale Outlet, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Motor Sales Outlet, Nightclub, Off-License, Office Based Industry, <b>Offices over 300 sq.m.</b> , Place of Public Worship, Residential – Build to Rent <sup>a</sup> , Service Station, <b>Shop-Specialist</b> , <b>Shop District</b> , Student Accommodation <sup>a</sup> , Travellers Accommodation.	
<b>a:</b>	Subject to retaining an appropriate mix of uses.

As demonstrated in the table above, the proposed development is fully in accordance with the zoning objectives. The subject scheme will result in the appropriate densification of a key underutilised site in the heart of Kiltarnan Village and the provision of a Neighbourhood Centre for the Village will positively contribute to the regeneration of the subject site.

As set out previously, the subject site is also located within the *Kiltarnan Local Area Plan 2013-2019* [extended to September 2023 but is now expired] ("*Kiltarnan LAP*"). The *Kiltarnan Neighbourhood Framework Plan 2013*, which is an appendix document to the *Kiltarnan LAP*, sets out the development framework for the Neighbourhood Centre zone:

*"Ideally there should be one Neighbourhood Centre to feature as the civic core for the LAP area. The provision of two centres, on opposite sides of Enniskerry Road, somewhat dilutes potential focus. It is intended that the southern-most NC node (Parcel No. 22) will be the primary node."*

*"The Framework Plan envisages that the node centred around Our Lady of the Wayside Church will become the primary retail, commercial and community focus for the village, centred on a new 'village green' that will become the heart of the village."*

The proposed development includes a Neighbourhood Centre and is therefore consistent with this development framework.

### 7.1.3 Compliance with the Development Management Standards of the Development Plan (Chapter 12)

Chapter 12 of the *Development Plan* sets out the Development Management Standards for Dún Laoghaire-Rathdown. The relevant standards are extracted and responded to below:

#### 12.2.1.2 Design Statements

*A Design Statement which is an outline of the proposal's context and aims, and how it responds to Development Plan objectives and surroundings, should be submitted for all applications of 1000+sq.m. commercial development or applications of 30+ residential units (refer also to Policy Objective PHP44 and Section 12.3.1 below).*

*An Architectural and Urban Design Statement prepared by MCORM Architects is included with this planning application. Policy Objective PHP44 and Section 12.3.1 are responded to below.*

#### 12.1.1.3 Landscape Plans

*Planning applications for 1000+sq.m. commercial development, 10+ residential units, or smaller developments (as deemed appropriate by the Planning Department), should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority).*

*A Landscape Design Statement and Drawings prepared by NMP Landscape Architects are included with this planning application.*

#### 12.1.2.1 Environmental Impact Assessment

*All Planning applications undergo EIAR screening or preliminary assessment.*

*An Environmental Impact Assessment Report is enclosed with this planning application.*

#### 12.1.2.2 Appropriate Assessment

*Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to Plans and Projects, Appropriate Assessment (AA) is required. If, following screening, it is considered that AA is required, then the proponent of the Plan or Project must prepare a Natura Impact Statement. A Plan or Project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:*

- *The Plan or Project will not give rise to significant adverse direct, indirect, or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or*



- *The Plan or Project will have significant adverse effects on the integrity of any European (that does not host a priority natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons of overriding public interest – including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European; or*
- *The Plan or Project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons for overriding public interest - restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European.*

An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley which concludes the following:

*"Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.3 above. In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.*

*Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)."*

### **12.1.2.3 Ecological Impact Assessment**

*An Ecological Impact Assessment may be required to be submitted with any proposed development should the Planning Authority consider that there is potential to impact upon an environmentally sensitive area such as a wildlife corridor, a site adjoining or adjacent to a proposed National Heritage Area, along the coastline or a river. The requirement for an ecological impact assessment will be determined on a case by case basis.*

*A Biodiversity EIAR Chapter has been prepared by Scott Cawley and is enclosed with this planning application. (EIAR has been collated by Enviroguide Consulting).*

### **12.2.1 Built Environment**

*The Planning Authority will encourage and promote the repair, retrofitting and reuse of buildings in preference to their demolition and reconstruction where possible (Refer also Section 12.3.9 Demolition and Replacement Dwellings). Where this cannot be achieved, the Planning Authority will support the use of sustainably sourced building materials and the reuse of demolition and*

excavated materials. See also Criteria 5 of the Department of the Environment Heritage and Local Government 'Urban Design Manual' (2009) and Policy Objectives CA6 and CA7.

*The Planning Authority will support the use of structural materials that have low to zero embodied energy and CO<sub>2</sub> emissions.*

*Buildings should be adaptable in design (see Criteria 9 of the 'Urban Design Manual' 2009 in the case of residential developments, Policy Objective CA8: Sustainability in Adaptable Design and Policy Objective PHP19: Existing Housing Stock: Densification and Adaptation). Innovative design and layout which provides natural ventilation incorporating design elements such as brise-soleil, green roofs, green walls and soft landscaping. Landscaping and tree planting will be promoted where feasible to reduce the urban heat island.*

*An Energy Statement should be included for all applications of 1000+ sq.m. commercial development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered. The planning Authority will support and encourage buildings of innovative design which seek to achieve Passive or Net Zero Carbon design standards.*

As set out throughout this report, the existing derelict dwelling known as 'Rockville' and associated derelict outbuildings, and the Former Kiltarnan Country Market (wooden structure) do not represent an efficient use of sustainable lands and the structures are not of any architectural merit. As shown in the images earlier in this report, the derelict dwelling and outbuildings are in poor condition and in our opinion, do not possess architectural merit and require demolition in order to provide a high-quality scheme in the heart of Kiltarnan. DLR have agreed with this position in the Phase 1 Planning Application where permission has been granted to demolish these buildings. The wooden structure associated with the Former Kiltarnan Country Market is also unremarkable. The development will utilise high-quality, durable and low maintenance materials. A response to Policy Objectives CA8 and PHP19 is also included in Section 7.1.3 below. An 'Energy Statement' has also been prepared by Waterman Moylan Consulting Engineers Limited.

### **12.2.6 Urban Greening**

*Applicants should explore the potential for urban greening in developments including:*

- *High quality landscaping (including tree planting), that make use of a diverse range of species of plants – consistent with the National Pollinator Plan, site appropriate and irrigated by rainwater.*
- *Incorporating Nature-Based Solutions (NBS) into the design of buildings and layout – living/green walls, living/green and or blue roofs including in the design of small buildings and shelters, other soft Sustainable urban Drainage Systems (SUDS) measures such as swales, rain gardens, using trees for urban cooling and the reduction of wind tunnel effect (Refer also Section 12.8.6). The Council is investigating developing a green factor method through a multi-disciplinary approach as set out in Section 3.4.4 Urban Greening. Data on all surface cover types is required. All applications that submit a stormwater audit shall submit the surface cover types as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems).*

NMP Landscape Architects have proposed a planting scheme that include pollinator friendly species, which facilitates urban greening at the subject development.

The SUDS features and measures include the use of green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices. In accordance with DLRCC guidelines, green roofs have been favoured and will be provided as follows:

• GREEN ROOF COVERAGE SUMMARY					
CELL REFERENCE	Extensive	Total Flat Roof Area (m <sup>2</sup> )	% Coverage of Green Roof	Min.% Req'd.	Pass/Fail DLRCC Min. %
Cell 3	253	292	87%	70%	PASS
CELL NC	1259	1384	91%	70%	PASS
CELL 09	599	689	86%	70%	PASS
CELL 06	421	452	93%	70%	PASS
CELL 13	61	70	87%	70%	PASS
CELL 16	47	54	87%	70%	PASS
APART'S (East site)	2485+2654	5566	92%	70%	PASS

Table 10 - Green/Blue Roof Coverage Summary

**Figure 7.3: Extract from the 'Engineering Infrastructure Report & Stormwater Impact Assessment' Demonstrating the Green Roof Coverage**

(Source: Roger Mullarkey & Associates, 2024)

The 'Engineering Infrastructure Report and Stormwater Impact Assessment' prepared by Roger Mullarkey & Associates includes an Audit in response to Section 7.1.5 of Appendix 7.

### 12.3.1 Quality Design

*A core aim of land-use planning is to ensure that new residential developments offer a high quality living environment for residents, both in terms of the standard of individual dwelling units and in terms of the overall layout and appearance of streets and outdoor spaces. In considering applications for new developments the Planning Authority will refer to Government guidelines that offer specific guidance in relation to design, including those listed in Appendix 12.*

The proposed development will be high-quality in terms of individual living units, overall layout and appearance of streets and outdoor spaces as detailed throughout this Report and the Design Statement. Appendix 13 of the *Development Plan* sets out the principal national, regional and local policy documents, guidelines and plans that have informed the County Development Plan. This Planning Report & Statement of Consistency provides a response to all relevant policy documents, guidelines and plans that are considered applicable to the proposed development.

#### 12.3.1.1 Design Criteria

*The objective of DLR County Council is to achieve high standards of design and layout to create liveable neighbourhoods. The following criteria will be taken into account when assessing applications:*

[A response is provided underneath each point (in purple text) to each bullet point of the policy (black text)]:

- Land use zoning and specific objectives contained in this Plan and any Strategic Development Zone / Local Area Plan / Urban Framework Plan / non-statutory planning guidance adopted by the Council.

*Response: As set out in Section 7.1.2, the proposed development is fully in accordance with the zoning objective pertaining to the subject site.*

- Compliance with other policy requirements contained within the Plan.

*Response: As set out throughout Section 7.0 of this report, the proposed development is in accordance with all relevant policy requirements of the Development Plan.*

- Consistency with any/all relevant National and Regional policy objectives.

*Response: As set out in Section 5.0 and 6.0, the proposed development is in accordance with all relevant National and Regional policy objectives.*

- Synergies with adjoining complementary uses and land use zoning objectives.

*Response: The surrounding lands are predominately zoned 'Objective A' as per a large portion of the subject site and as set out in Section 7.1.2, the subject scheme provides residential development with a new Neighbourhood Centre, which improves residential amenity and protects the existing residential amenities which accords with this zoning objective. The Neighbourhood Centre will support previous and future development in the village. There are some lands zoned Objective F (Open Space) and Objective G (High Amenity) to the east of the lands, which has been appropriately considered in the scheme layout i.e. buildings have been set back from the red line boundary and open space has been provided adjacent to the neighbouring open space / high amenity lands to ensure sufficient 'breathing' room and transitions have been provided between the different land zonings.*

- Density - Higher densities should be provided in appropriate locations. Site configuration, open space requirements and the characteristics of the area will have an impact on the density levels achievable.

*Response: As set out throughout this report, the proposed net density of c. 41 units per hectare (uph) will appropriately densify these sustainable and underutilised lands and will yield a significantly more appropriate and sustainable density (and is in accordance with the parameters of the now expired LAP). Policy Objective PHP18 and PHP20 which relate to density have also been fully responded in this report.*

- Quality of the proposed layout and elevations, the quality of the residential environment will be of primary significance in determining the acceptability of planning applications. Layouts, elevations, and plan form must be designed to emphasise a 'sense of place' and community, utilising existing site features, tree coverage and an appropriate landscape structure.

*Response: The proposed high-quality development comprising 487 No. residential units and a Neighbourhood Centre will create a sense of place and will make a positive*



*contribution to the urban neighbourhood, streetscape and public realm. The inclusion of high-quality open spaces will enhance the quality of life for future residents and the opening up of the site onto Enniskerry Road and Glenamuck Road will positively contribute to the local area by improving legibility for the community.*

- *Levels of privacy and amenity, the relationship of buildings to one another, including consideration of overlooking, sunlight/daylight standards and the appropriate use of screening devices.*

*Response: These items have been appropriately considered as part of the proposed development as follows:*

*-Levels of privacy and amenity: Appropriate separation distances provided, gradual increase in height in an appropriate location i.e. Neighbourhood Centre and on the eastern lands, provision of ample, carefully considered landscape planting where necessary.*

*-Relationship of buildings to one another: This has been thoroughly considered and discussed throughout the application documentation e.g. adequate separation distances have been provided i.e. a large distance of c. 34.6 metres between apartment blocks on the eastern lands, high levels of daylight will infiltrate to the proposed rooms and there will be minimal impact on daylight to surrounding properties.*

*-Overlooking: The design has had regard for the residential amenity, privacy and built-form of neighbouring properties to ensure that overlooking does not occur e.g. adequate separation distances, heights increased in suitable locations and upper level set backs.*

*-Sunlight/daylight standards: The proposed development has been carefully designed and modulated to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites. In addition, the proposed scheme will perform well in relation to daylight/sunlight.*

- *Quality of linkage and permeability – to adjacent neighbourhoods and facilities and the nature of the public realm/streets and spaces. Walking and cycling permeability shall be maximised at every opportunity.*

*Response: The scheme has provided the opportunity to open up the site and provide enhanced permeability for Kilternan by providing linkages through the site to the neighbouring Rockville development and the future GLDR, which will be positive for the area. The opening up of the site onto Enniskerry Road, especially with the provision of a Neighbourhood Centre and Village Green, will positively contribute to the local area by improving legibility and the provision of services and amenities for the community. The provision of residential development fronting the Glenamuck Road to the north will also activate the streetscape which is currently inactive. The corner of Glenamuck Road and Enniskerry Road will be provided with high quality duplex blocks overlooking the street frontage. The development will not be gated, ensuring that it reads as being open and connected with the streetscape.*

- *Accessibility and traffic safety - proximity to centres and to public transport corridors, existing and proposed.*

*Response: The site is also located c. 1.9 km-c. 2.3 km (c. 22-26 minutes walking distance) from Carrickmines Retail Park and c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop.*

*The site is located in Kilternan Village with access to a pub/restaurant, a petrol filling station and shop, a car garage and auto service, a creche and education facilities such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre as well as religious services in the Village such as Kilternan Parish Church and Our Lady of the Wayside Church. The proposed development includes a Neighbourhood Centre, which will provide additional services for Kilternan including an anchor retail store, commercial / retail floorspace, a restaurant, a creche, a café and a community centre. Bus route Nos. 44, 63 and 118 serve the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. There are also several proposed new bus routes for Kilternan within the Bus Connects scheme will serve Kilternan Village and offer transport links to Dublin City Centre and other suburbs and employment locations and education facilities in the greater Dublin area such as University College Dublin. Therefore, it is clear that the subject site is accessible.*

- *Quantitative standards - set out in this Chapter and/or referenced in Government guidelines.*

*Response: A full response to the relevant quantitative standards of Chapter 12 are provided within this Report in Section 7.o. All relevant Government Guidelines are responded to in Section 5.o.*

- *Safety and positive edges to the public realm - opportunities for crime should be minimised by ensuring that public open spaces are passively overlooked by housing and appropriate boundary treatments applied.*

*Response: The outdoor spaces will be subject to a high level of passive surveillance as they will be overlooked by the residential units and/or the Neighbourhood Centre, ensuring that these areas are safe and secure. Play spaces are provided for children and toddlers which will be safe and enjoyable.*

- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public or communal open space.*

*Response: Private open space has been provided for all units and in addition, a large quantum of communal open space (4,364 sq m) will be provided for the apartments and duplexes and 23,636 sq m of public open space will also be provided. These spaces are high quality and will provide a natural character throughout the scheme. The relationship between the spaces is demonstrated in the Landscape Design Statement by NMP Landscape Architects.*

- *Quality of the pre-existing environmental sound environment.*

*Response: As set out in the Acoustic Design Statement prepared by RSK Ireland Limited, "baseline monitoring has found pre-existing noise levels are typical of a suburban location in the vicinity of a busy road network".*

- *Context - having regard to the setting of the site, the surrounding character, streetscape, and the impact of any proposed development on the development potential of adjoining sites.*

*Response: As discussed throughout the application documentation, the surrounding context is transitioning in character from lower density housing to a mix of low and higher density developments. The potential impact of the proposed development on adjoining sites has been appropriately assessed (Daylight and Sunlight Assessment, Landscape and Visual Impact Assessment etc.). The proposed development has been carefully designed and modulated to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites.*

- *Variety of house types and unit size.*

*Response: The development provides 487 No. residential units comprised of 53 No. one bedroom units (35 No. apartments and 18 No. duplexes), 150 No. two bedroom units (38 No. houses, 16 No. apartments and 96 No. duplexes), 236 No. three bedroom units (110 No. houses, 39 No. apartments and 87 No. duplexes), and 48 No. four bedroom units (48 No. houses), which will provide a variety of house types and unit sizes for the area.*

- *Variety in layout through providing different lengths and types of residential roads, mixes of 'cul-de-sac', loop roads, set-back road sections, loose grid layouts and similar.*

*Response: The layout includes a legible network of streets that provides desire lines and enhances internal and external connectivity. The permeable links provided throughout the site layout provide a variety for pedestrians and cyclists and will be a safe space for all.*

- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.*

*Response: The scheme will enhance the street frontage onto Enniskerry Road and Glenamuck Road and will provide passive surveillance onto the GLDR which is due to be constructed by Q1 2026. Passive surveillance of all open spaces will also be provided. The enhancement and provision of permeable connections through the site, in particular the Dingle Way, will make a positive contribution to the Village and the provision of a Neighbourhood Centre will enhance available amenities for the area. The 'eastern lands' to the east of the GLDR will also be opened up and residential units will be provided on this portion of the site. The development includes a range of building heights from 2 to 4 No. storeys and large open spaces which allows the development to breathe, and this will provide a good relationship between all elements of the scheme.*

- *Roofscape, plant and green roofs.*

*Response: These elements have all been included and detailed where relevant as part of the development.*

Having regard to these responses, the development will achieve high standards of design and layout.

### 12.3.2.2 Sustainable Neighbourhood Infrastructure – Future Provision

#### (i) New Residential Communities

*Planning applications for residential development on sites greater than 1ha or more than 50 residential units located in new residential communities (as set out in Figure 2.9, Chapter 2) will be required to facilitate sustainable neighbourhood infrastructure (SNI) (see Policy Objective PHP2 for a definition of SNI) through one or more of the following ways:*

- *Reserve an area of not less than 5% of the site area for a future SNI facility. The site reservation may be part of the 15% public open space requirement (see Section 12.8.3.1) and may be subject to a Section 47 agreement with the Planning Authority. The area to be reserved shall be located in a manner that can be readily amalgamated with similar reservations within adjoining lands.*
- *Provide an appropriate SNI facility (see definition in Policy Objective PHP2) with a floor area of 130 sq.m. per 1,000 population equivalent. The type of facility must have regard to the demographic of the emerging area and any existing and planned facilities and services within a 1km distance / 10 minute walk of the site. It should be noted that a commercial childcare facility shall not be considered to be an SNI facility for the purposes of this Section.*
- *Provide a development contribution under Section 48 of the Planning and Development Act 2000 towards the provision and/or improvement of a community, cultural or civic facility that the residents of the proposed development will benefit from.*

*For sites less than 1ha or less than 50 residential units, the Council may consider attaching a development contribution under Section 48 of the Planning and Development Act 2000 for the provision and/or improvement of community, cultural or civic facility that the residents of the proposed development will benefit from.*

The subject site is located within a New Residential Community as designated on Figure 2.9 in Chapter 2. Policy Objective PHP2 states the following in relation to Sustainable Neighbourhood Infrastructure:

*'It is a Policy Objective to:*

- *Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- *Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- *Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.'*

Section 4.2.1 of the *Development Plan* further notes that:



*'Sustainable neighbourhood infrastructure is an umbrella term that, for the purposes of this Plan, includes land or buildings related to serving the needs of the local and wider community for **social, educational, health**, religious, recreational and leisure, cultural, and civic needs. Much of the existing sustainable neighbourhood infrastructure in the County offers a multi-faceted social function within neighbourhoods and provides an important role within communities. These facilities and services may be provided by public sector bodies, the community themselves or by the private sector.'* [Our Emphasis]

The proposed development includes a community facility that comprises sustainable neighbourhood infrastructure (336 sq m). The provision of 336 sq m of Sustainable Neighbourhood Infrastructure will be a positive insertion to the local community. We note that 487 No. units are proposed and when the national household size of 2.7 is utilised, this would result in 1,315 No. persons being accommodated within the proposed development. The *Development Plan* requires an appropriate SNI facility of 130 sq m per 1,000 population equivalent and therefore the proposed development far exceeds this requirement as 336 sq m is provided (c. 2 No. times the requirement). It is considered that this provision will adequately serve the surrounding existing and future population and the additional services provided within the Neighbourhood Centre will be an additional significant benefit. In addition, the 'Social Infrastructure Audit' notes that: "Given the size of the planned development it is judged that the proposed level of retail, community, restaurant/café space, and childcare space will greatly enhance the attractiveness and overall amenity of the village, and is likely to have a positive impact on the quality of services and facilities currently available in the locality".

#### *(ii) Existing Built Up Area*

*For residential schemes within the existing built up area, the Council will consider a development contribution under the Council Section 48 Levy Scheme for the provision and/or improvement of community, cultural or civic facility that the residents of the proposed development will benefit from.*

*Where the Community Audit (See Section 4.2.1.4 Policy Objective PHP5: Community Facilities) has identified a deficit in an area the Council may require the applicant to accommodate an SNI facility to address this deficit.*

*In both new residential community areas, and the existing built up area where a future school has been identified within or immediately adjoining the subject site, the applicant shall engage with the Department of Education and Skills (DES) in order to ascertain their requirements in relation to site provision.*

*Where a question arises as to whether a site falls within the built up area or within a new residential community area as set out in the Core Strategy and Figure 2.9 the decision shall be solely at the discretion of the Planning Authority.*

The subject site is located within a New Residential Community rather than an Existing Built-up area according to Figure 2.9 of the *Development Plan*.

The Social Infrastructure Audit enclosed confirms that there is adequate social infrastructure available to serve the proposed development having regard to the provision of 6,125 sq m of non-residential uses proposed within the subject development (which incorporates a community facility for example).

### 12.3.3 Quantitative Standards for All Residential Development

*Applications for residential schemes shall comply with all relevant requirements set out in PHP20: Protection of Existing Residential Amenity (see Section 4.3.1.3).*

Policy Objective PHP20: sets out that it is a Policy Objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments. The site is located within a New Residential Community rather than a Built-Up Area, however the scheme strikes a balance between developing underutilised lands to provide a high quality residential development while also protecting the surrounding properties with adequate separation distances and setbacks at upper levels provided where required. The 'Landscape and Visual Impact Assessment' and 'Daylight and Sunlight Assessment' confirm that no material impacts will occur on surrounding properties.

#### 12.3.3.1 Residential Size and Mix

*The finding of the Housing Strategy and HNDA have informed policy PHP27 in relation to mix (refer to Appendix 2 Housing Strategy and HNDA 2022 – 2028).*

*In order to demonstrate compliance with Policy Objective PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County. Council Part 8 or Part 10 residential schemes, may propose a different mix having regard to the specific needs of the Council Housing Department.*

*The proposed provision of residential units (both houses and apartments), shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/ or within the County. New residential communities (as set out in the Core Strategy and Figure 2.9 of the Core Strategy Map) shall ensure an appropriate mix including a proportion of larger units. Applications received in both new residential communities and within the residual built up area shall include:*

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
  - *Are designed and located having regard to the needs of older people and/or persons with a disability.*
  - *Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.*
- *A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.*

Table 12.1 sets out the mix requirements for apartment developments. Duplexes are considered to be apartments for the purposes of mix.

**Table 12.1** Apartment Mix Requirements

Area	Threshold	Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
New Residential Community (See figure 2.9 Core Strategy Map)	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units and with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Lands within SUFP	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

To avoid ambiguity and provide clarity a worked example is given below.

**Table 12.2** Worked example of DLR Apartment Mix requirements

Location	Proposed Development	Studio/1/2 bed Mix (Apartments and Duplexes) Requirement	Minimum 3+ bed Requirement (Apartments)
New Residential Community/ SUFP	100 apartments	Up to 60 studio, 1 or 2 bed which can include ≥ 30 2 beds and can include up to 30 studio and 1 bed units with no more than 20 studios in that 30 units.	Minimum 40 no. 3 bed plus units.
Existing Built Up Area	100 apartments	Up to 80 studio, 1 or 2 bed units which can include ≥ 50 2 bed units and can include up to 30 studio and 1 bed units with no more than 20 studios in that 30 units.	Minimum 20 no. 3 bed plus units.

Honeypark

- Please see below map which indicatively sets out existing and permitted unit types within a 10-minute walk of the proposed development:



[Green = Mix of Apartments/Houses (Existing and Permitted)

Blue = Existing or Permitted Apartments

Yellow = Existing or Permitted Houses]

2. A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units is set out below:

Unit Type	No. of Units	Percentage	Size
One Bedroom	53	11%	46.2 sq m to 62.3 sq m
Two Bedroom	150	31%	75.1 sq m to 97.4 sq m
Three Bedroom	236	48%	114 sq m to 133.8 sq m
Four Bedroom	48	10%	124 sq m to 219 sq m
<b>Total:</b>	<b>487 No.</b>	<b>100%</b>	



Table 12.1 of the *Development Plan* extracted above refers to the breakdown of apartment units which is as follows for the subject scheme:

Unit Type	No. of Units	Percentage
Studio	-	-
One Bedroom Apartment/Duplex	53	18%
Two Bedroom Apartment/Duplex	112	39%
Three Bedroom Apartment/Duplex	126	43%
<b>Total:</b>	<b>191 No.</b>	<b>100%</b>

Table 12.1 of the *Development Plan* notes the requirement for 40% 3 No. bedroom apartments to be provided and as set out above, the scheme provides 43% 3 No. bedroom apartments, which is considered acceptable for the subject development.

3. In relation to the request for the following:

- A site and/or floor plans that clearly identify proposed units that:
  - Are designed and located having regard to the needs of older people and/or persons with a disability.
  - Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.
- A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.

We note that the proposed scheme will provide a variety of housing types for the Kilternan area with the provision of a mix of 1, 2, 3 and 4 No. bedroom units.

As noted in the 'Housing Options for Our Ageing Population (2019)',

*"Developments and neighbourhoods should incorporate a mix of dwelling type, size and tenure to support sound social and environmental policy objectives."*

The addition of these high-quality and varied units to the locality will provide a downsizing option for the ageing population of the area who wish to remain in their locality to which they have a link and connection to the community rather than the actual physical dwelling.

Furthermore, the dwellings would be capable of integrating assisted technologies if required while the development will be fully accessible as outlined in the Universal Access Statement by MCORM Architects, ensuring the *"the design provides for persons/users with a wide range of abilities and the intention is to make the design appealing to all end users/ residents. There are a wide variety of unit types within the estate to cater for this."*

*In schemes of 50+ units, where a mixture of housing and apartments or a scheme comprising solely of houses is being provided on a site the housing offering must ensure a mixture that includes a proportion of housing units that are 3 beds or less. In new residential community areas, it is appropriate that schemes generally include houses in addition to apartment/duplexes. In deciding on the mix of house and apartments in these areas regard shall be had to the details of*

existing and permitted unit types within a 10-minute walk of the proposed development (see bullet point above). The apartment element, if in excess of 50 units, shall comply with the table above. Where a question arises as to whether a site falls within the built up area or within a new residential community area, as set out in the Core Strategy and Figure 2.9, the decision shall be solely at the discretion of the Planning Authority.

The site is within a new residential community as annotated on Figure 2.9 of the Core Strategy. The mix of units outlined above is appropriate for the area and will provide a choice of tenure with the provision of 11% one bedroom units, 31% two bedroom units, 48% three bedroom units and 10% four bedroom units. The scheme includes 196 No. houses, 201 No. duplexes and 90 No. apartments which provides a varied choice of housing type. As shown in the map above, the Kilternan area provides a mix of houses and apartments, which is also reflected in the proposed development and will thus add further choice and variety to the village and surrounding area. The apartment element also provides in excess of the required 40% 3 No. bedroom units.

### **12.3.3.2 Residential Density**

In general, the number of dwellings to be provided on a site should be determined with reference to the Government Guidelines document:

- *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009).*
- *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).*

As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4).

As noted previously, the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the 'Sustainable Residential and Compact Settlement Guidelines-Guidelines for Planning Authorities 2024 (Compact Growth Guidelines). Section 5.7 provides an assessment of the net density proposed for the scheme which is in accordance with the *Compact Growth Guidelines*.

The proposed development represents the consolidation of these underutilised Village Centre lands by providing much needed residential units and a Neighbourhood Centre in this sustainable location, which will contribute positively towards addressing the national housing crisis. The height and the density has been provided in an appropriate transitional manner. Therefore, the density of the proposed development can be appropriately assimilated into the surrounding environment. A response to Policy Objective PHP18 is also provided in this Report.

### **12.3.4 Residential Development – General Requirements**

The following general requirements relate to all housing developments including both housing and apartment developments and should be considered when designing housing developments to ensure general requirements as outlined below (see also Section 12.3.1.1 for overall design criteria).

#### 12.3.4.1 Road and Footpath Requirements

*The requirements set down in the Council's 'Development Works in Residential and Industrial Areas' - Guidance Document, the Council's 'Taking in Charge Policy Document', (2011 – updated 2013) and 'The Design Manual for Urban Roads and Streets', (DMURS), 2019, will generally apply.*

*Where an innovative layout is accepted by the Planning Authority variations to these requirements may be accepted. In allowing any deviation in the general requirements, the primary consideration will be the safety of pedestrians, cyclists and access for emergency vehicles.*

*Continuous footpaths shall be provided at junctions, and vehicular entrances, to facilitate people with ease of movement. At any such junctions where continuous footpaths are neither feasible nor appropriate, dished kerbs with tactile paving shall be provided to facilitate people with ease of movement.*

AtkinsRéalis have advised that the design of the road, pedestrian and cycle network is compliant with the DMURS and the DLR Policy Document. Continuous footpaths are provided at junctions.

A 'DMURS Statement' has been prepared by AtkinsRealis and is enclosed separately.

#### 12.3.4.2 Habitable Rooms

*The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission, including the minimum dimensions as set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018), and 'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).*

*All habitable rooms within new residential units shall have access to appropriate levels of natural /daylight and ventilation. Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated, or subsequent guidance, in this regard. A daylight analysis will be required for all proposed developments of 50+ units, or as otherwise required by the Planning Authority. The impact of any development on existing habitable rooms should also be considered.*

Please see Section 5.6 of this Report for a response to the relevant standards of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018) [now 2023] ("Apartment Guidelines, 2023"), which demonstrates that the scheme will conform with the relevant standards of these Guidelines. Please see Section 5.8 of this Report for a response to the relevant policies of the Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).

A Daylight and Sunlight Assessment prepared by 3D Design Bureau is enclosed separately. The proposed development has been carefully designed to ensure there is minimal impact on the daylight and sunlight reaching the existing and proposed residences, and to ensure that future residents are afforded a high level of daylight infiltration.

#### 12.3.4.4 Phased Development

*No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development.*

*In addition, when considering proposals for development within the curtilage of Protected Structures a proposed phasing agreement should be provided (refer to Section 12.11.2.3).*

*A phasing schedule for any such development shall be submitted with a planning application.*

The 'Social Infrastructure Audit' enclosed confirms that there is adequate social infrastructure (existing and proposed) to serve the proposed development and locality. The 'Engineering Infrastructure Report and Stormwater Impact Assessment' by Roger Mullarkey & Associates confirms there is adequate physical infrastructure to serve the development. In particular, a Confirmation of Feasibility and Statement of Design Acceptance has been received from Uisce Eireann. The *Traffic and Transport Assessment* also notes that "the proposed development is considered appropriate, and it is considered that there are no traffic or transport impacts that would preclude this development from proceeding".

In relation to a phasing schedule, please refer to Section 2.6 of the 'Summary Response to DLRCC LRD Opinion' prepared by Thornton O'Connor Town Planning.

#### 12.3.4.5 Management Companies and Taking in Charge

*In residential developments, which are not proposed to be Taken in Charge by the Council, evidence will be required that private Management Companies are to be set up by time of completion of the estate, and of which membership shall be compulsory for all purchasers of property. If a development (or part thereof) is to be Taken in Charge by the Council the applicant shall agree, which areas are to be Taken in Charge, and this shall be clearly indicated on a site layout plan. All areas not to be Taken in Charge by the Council, shall also be clearly indicated on a site layout plan, and shall be maintained and the responsibility of a properly constituted Private Management Company. These details shall be submitted with the planning application. All roads, footpaths, sewers, drains, lighting columns, mini-pillars, watermain, services and open spaces within the privately managed areas, irrespective of the management and maintenance regime to be put in place for these areas, shall be satisfactorily completed to the standard for development works as set out in the Council's 'Development Works Guidance Document'. In this regard, the applicant shall have regard to the Department of the Environment, Community and Local Governments document 'Taking in Charge of Residential Developments Circular Letter PD 1/08', and 'Circular Letter PL 5/2014', the Departments 'National Taking in Charge Initiative Report', 2018, and the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.*

McCossan O'Rourke Manning Architects have prepared Taking In Charge Drawings (Dwg Nos. PL600, PL600.1, PL600.2, PL600.3 and PL600.4), which demonstrate the areas proposed to be taken in charge (i.e. the roads and streets).



A Private Management Company will be engaged to ensure all property management functions area dealt with for the development. As set out in the 'Lifecycle and Management Report':

*"It is proposed that the "Kilternan Village Development" will be a Managed Scheme/Development and an Owners Management Company (OMC) will be incorporated as defined by the Multi-Unit Developments Act 2011 "a company established for the purposes of becoming the owner of the common areas of a multi-unit development and the management, maintenance and repair of such areas and which is a company registered under the Companies Acts"."*

#### **12.3.4.7 Refuse Storage and Services**

*Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents.*

*In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. (See also Appendix 6).*

Please refer to the 'Operational Waste Management Plan' prepared by Enviroguide Consulting which details the waste strategy for the proposed development.

#### **12.3.5 Apartment Development**

See Section 12.4.5 and Section 12.8 for Car Parking and Open Space Requirements pertaining to apartment developments.

See responses to these sections below.

##### **12.3.5.1 Dual Aspect in Apartments**

*A dual aspect apartment is designed with openable windows on two or more walls, allowing for views in more than just one direction. The windows may be opposite one another, or adjacent around a corner. The use of windows, indents or kinks on single external elevations, in apartment units which are otherwise single aspect apartments, is not considered acceptable and/or sufficient to be considered dual aspect and these units, will be assessed as single aspect units.*

*Specific Planning Policy Requirement (SPPR) 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018), provides guidance with respect to the minimum number of dual aspect apartments that may be provided in any single apartment schemes. In accordance with this guidance, DLR as a County is classified as a suburban or intermediate location and therefore:*

- *There shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, DLR may exercise discretion to consider dual aspect unit provision at a level lower than the 50% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

*The proposed houses within the scheme will all be dual aspect and 83% of the apartments and duplexes will be dual aspect.*

The following two policies are in relation to separation distances:

### **12.3.5.2 Separation Between Blocks**

*All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.*

*A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.*

### **12.8.7.1 Separation Distances**

*A minimum standard of 22 metres separation between directly opposing rear first floor windows should usually be observed, for new developments. This normally results in a minimum rear garden depth of 11 metres. However, this required rear garden depth may be prior to any domestic rear extensions, which may require planning permission or be exempted development being carried out. Adequate separation distances, between directly opposing rear first floor windows, should be provided when extending existing dwellings at first floor level, to ensure the retention of adjoining residential amenity. For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity.*

*However, where sufficient alternative private open space (e.g. to the side) is available, the required separation distance for new developments may be reduced, subject to the maintenance of privacy and protection of adjoining residential amenities.*

*In all instances, private open space should not be unduly overshadowed and where there is the potential for the proposed development to overshadow or overlook existing/future development adjoining the site, minimum separation distances to boundaries should be increased.*

*In an exceptionally well-designed scheme providing an otherwise very high-quality living environment and that is in close proximity to existing public open spaces, the above standards may be relaxed.*

*Any relaxing of standards will be assessed on a case-by-case basis and should not be seen as setting a precedent for future development.*

In response, we firstly note that the *Compact Growth Guidelines* have been published and adopted since the adoption of the *Development Plan*. As detailed in Section 5.7, the *Compact Growth Guidelines* allow a reduction in separation distances to 16 No. metres. As noted in that section, the scheme principally provides large separation distances across the site. The development only utilises the reduced allowance on a small number of occasions, which demonstrates the high-quality of the scheme.

Please see MCORM's architectural drawing pack for further details.

### 12.3.5.3 Internal Storage and External Storage

Internal storage standards for apartments shall accord with, or exceed the levels outlined in Table 12.3 below:

Unit Type	Minimum Storage Space Requirement
One Bedroom	3 sq m
Two Bedrooms (3 persons)	5 sq m
Two Bedrooms (4 persons)	6 sq m
Three bedrooms	9 sq m

- Storage should be additional to kitchen presses and bedroom furniture.
- Hot press/boiler space will not count as general storage.
- No individual storage room should exceed 3.5sq.m. and shall be provided within the apartment unit.

Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.

All units will meet, and exceed in some cases, the internal storage standards and requirements set out in Table 12.3. Please refer to the Housing Quality Assessment Tables prepared by MCORM Architects. Bedroom furniture has not been included in the storage calculations. If a storage room exceeds 3.5 sq m, the additional space is a bonus for the units (however 3.5 sq m is only counted towards the storage calculations).

External storage has also been provided in various locations throughout the site (please refer to Dwg Nos. PL608-611 and individual block drawings). This will provide space for bulky items outside individual units and will be additional to the minimum internal storage requirements.

### 12.3.5.4 Penthouse Development

The addition of a penthouse level – which typically consists of high quality roof level living accommodation in an apartment development - may be acceptable where living space constitutes the equivalent of one storey and is set back from the edge of the building. A penthouse level should have regard to the overall design of an apartment block and should be finished with high quality materials and not have a negative visual impact on the skyline and/or streetscape (refer also to the Building Height Strategy set out in Appendix 5).

There are no penthouse levels proposed, however the development includes apartment blocks ranging in height from 2 to 4 No. storeys on the eastern lands only. The scheme has taken the opportunity to explore increased heights on the eastern portion of the lands, which have a large frontage onto the future GLDR.

### 12.3.5.5 Minimum Apartment Floor Areas

All apartment developments shall accord with or exceed the minimum floor areas indicated in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities', (2018), as set out in the Table 12.4 below.

In this regard, the areas listed are minimum standards and should not be taken as the norm for all developments; higher floor areas will be encouraged throughout the County.

Unit Type	Minimum Area per Unit
Studio	37 sq m
One Bed	45 sq m
Two Bedrooms (3 persons)	63 Sq m
Two Bedrooms (4 persons)	73 sq m
Three bedrooms	90 sq m

In order to safeguard standards, the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed, by a minimum of 10% (excluding studios).

As set out in the Housing Quality Assessment prepared by MCORM Architects, all units meet the minimum overall apartment floor areas. Some 227 No. of the total apartments/duplexes (total = 291 No.) will exceed the minimum floor area by 10% (representing 78% of the total). The scheme therefore provides very high-quality units due to the large quantum of units exceeding the minimum size by 10%.

### 12.3.5.6 Additional Apartment Design Requirements

Ground level apartment floor to ceiling heights shall be a minimum of 2.7 metres and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, Planning Authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

A maximum of 12 apartments per floor per core may be provided in apartment schemes\* (Not applicable to BTR development in accordance with SPPR 8). This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality, and compliance with building regulations.

The ground floor areas of the commercial units are provided with floor to ceiling heights of 3.3 – 3.75 metres, the apartment blocks are provided with a minimum ground level floor to ceiling height of 3.3 metres and upper levels provide heights of 2.775 metres. The duplexes all meet minimum requirements of 2.7 metres with the majority providing ground floor to ceiling heights of 2.925 metres. All upper levels of the duplexes have been designed with floor to ceiling heights of 2.585 – 2.7 metres, which is considered good practice.



Apartment Blocks 1 and 2 provide 8 No. units per core and Apartment Block 3 provides 7 No. units per core, which is therefore in accordance with the *Development Plan*.

### 12.3.7.7 Infill

*In accordance with Policy Objective PHP19: Existing Housing Stock – Adaptation, infill development will be encouraged within the County. New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.*

*This shall particularly apply to those areas that exemplify Victorian era to early-mid 20th century suburban 'Garden City' planned settings and estates that do not otherwise benefit from ACA status or similar. (Refer also to Section 12.3.7.5 corner/side garden sites for development parameters, Policy Objectives HER20 and HER21 in Chapter 11.*

It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*. The development represents sustainable infill development of underutilised lands which will fill in a natural gap between Rockville and Enniskerry Road and has been designed to assimilate with the surrounding environment.

### 12.3.8 Housing for All

#### 12.3.8.1 Age Friendly Housing

*Having regard to the current and future demographic conditions and the ageing demographic of the County, it is an objective of the of DLR to promote an age friendly approach by ensuring that both existing and proposed residential developments are future proofed for an ageing population.*

*In accordance with the principles of the Policy Statement 'Housing Options for Our Ageing Population' 2019, the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-friendly approach, with facilities and materials inclusive of an age-friendly community/society in line with the above guidelines.*

The proposed scheme will provide a variety of housing types for the Kiltarnan area with the provision of a mix of 1, 2, 3 and 4 No. bedroom units.

As noted in the 'Housing Options for Our Ageing Population (2019)',

*"Developments and neighbourhoods should incorporate a mix of dwelling type, size and tenure to support sound social and environmental policy objectives."*

The addition of these high-quality and varied units to the locality will provide a downsizing option for the ageing population of the area who wish to remain in their locality to which they have a link and connection to the community rather than the actual physical dwelling.

Furthermore, the dwellings would be capable of integrating assisted technologies if required while the development will be fully accessible as outlined in the 'Universal Access

Statement' by MCORM Architects, ensuring the "the design provides for persons/ users with a wide range of abilities and the intention is to make the design appealing to all end users/ residents. There are a wide variety of unit types within the estate to cater for this".

### **12.3.9 Demolition and Replacement Dwellings**

*The Planning Authority has a preference for the deep retro-fit of structurally sound, habitable dwellings in good condition as opposed to demolition and replacement unless a strong justification in respect of the latter has been put forward by the applicant. (See Policy Objective CA6: Retrofit and Reuse of Buildings and Policy Objective PHP19: Existing Housing Stock - Adaptation).*

*Demolition of an existing house in single occupancy and replacement with multiple new build units will not be considered simply on the grounds of replacement numbers only but will be weighed against other factors. Better alternatives to comprehensive demolition of, for example, a distinctive detached dwelling and its landscaped gardens, may be to construct structures around the established dwelling and seek to retain characteristic site elements.*

*The Planning Authority will assess single replacement dwellings within an urban area on a case by case basis and may only permit such developments where the existing dwelling is uninhabitable.*

*Applications for replacement dwellings shall also have regard to Policy Objectives HER20 and HER21 in Chapter 11. In this regard, the retention and reuse of an existing structure will be encouraged over replacing a dwelling, and the planning authority will encourage the retention of exemplar nineteenth and twentieth century dwellings on sites in excess of 0.4 hectares. Applications for replacement dwelling within the rural area will be assessed under the provision of Section 12.3.10.4.*

The subject scheme will result in the appropriate densification of an underutilised site, providing high-quality residential units and a Neighbourhood Centre in lieu of the existing derelict dwelling known as 'Rockville' and associated derelict outbuildings (to be demolished), and the former Kiltiernan Country Market wooden structure (also to be demolished). The existing nature of the site does not represent the sustainable use of serviced land in the context of contemporary planning policy, policies which seek to more appropriately and efficiently use scarce urban land. In addition, we note that the structures are not Protected Structures and thus are suitable for demolition.

### **12.4.1 Traffic Management and Road Safety**

*The road layout of new residential, commercial, and/or mixed-use developments shall be designed in accordance with DMURS which seeks to create self-enforcing 30km/h zones. This Manual sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets, incorporating a multidisciplinary approach to the design of low speed environments in urban areas. All works carried out shall meet the requirements of the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.*

*To provide for pedestrians and cyclists as part of the development management process, all new development will be required to maximise permeability and connectivity for pedestrian and cyclists and to create direct links to adjacent roads and public transport networks in accordance with the provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), 'Sustainable*

*Urban Housing: Design Standards for Apartments’ (2018) and the ‘Design Manual for Urban Roads and Streets’ (DMURS, 2019).*

*On existing roads, traffic management measures may be required to create a pedestrian and cycle friendly environment. Road safety interventions may also be required to create a safe road environment for all road users such as the provision of accessible pedestrian facilities and segregated cycle tracks.*

*To ensure that the needs of all road’s users are considered, a Quality Audit may be required for major developments that impact on the road network and for all new road and traffic schemes. This should be carried out in accordance with DMURS and best UK practice. The Design Manual for Urban Roads and Streets Quality Audits generally consist of a number of individual and overlapping audits that may include: an audit of visual quality; a review of how the street is/may be used by the community; a road safety audit, including a risk assessment; an access audit; a walking audit; a cycle audit; a non-motorised user audit; a community street audit (in existing streets); and a place check audit. A street design audit was added as an additional audit type in the DMURS Guidance in 2019. It can be submitted as a component of a Quality Audit (for larger projects) or as a stand-alone audit process for smaller projects, the emphasis is on placemaking and promoting the multidisciplinary aspects of successful street design. This is an auditing tool that can be used to ensure that the the four major aspects of street design as set out in DMURS: Connectivity, Self-Regulating Street Environment, Pedestrian and Cycling Environment, and Visual Quality are appropriately taken into account.*

*Potential applicants for planning permission should engage in pre-planning discussions to ascertain which audits, if any, should be submitted with the application. Further details on the guidance on the audit thresholds can be found within the ‘Development Management Thresholds Information Document’ in Appendix 3.*

The design of the road network is DMURS compliant (Please see *DMURS Statement* is enclosed separately). Permeability through and within the site is maximised. The Enniskerry Road treatment improves pedestrian and cycle facilities making it safer for all road users and improves its place making function as a neighbourhood centre area. A *Quality Audit* has been carried out by NRB Consulting Engineers and is included as part of the planning application.

Pedestrian and cyclist permeability has been comprehensively considered and the scheme maximises permeability and connectivity for pedestrian and cyclists by creating direct links through and within the site to surrounding areas/developments. Furthermore, please refer to Section 5.6 of this Report for a response to the relevant provisions of the ‘*Sustainable Urban Housing: Design Standards for Apartments’ (2018) [now 2023]* and Section 5.10 for the ‘*Design Manual for Urban Roads and Streets’ (DMURS, 2019)*. We note that the ‘*Urban Design Manual – A Best Practice Guide’ (2009)* has now been replaced by the ‘*Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2024’ (Compact Growth Guidelines)*, which is detailed in Section 5.7 of this Report.

#### **12.4.2 Traffic and Transport Assessment**

*Where new development has significant car trip potential, a detailed assessment of:*

- *The transportation systems available and*
- *The impact of the proposed development on the surrounding environment and transportation network, should be appraised through the submission of a Traffic and Transport Assessment (TTA), in accordance with Transport Infrastructure*

Ireland (TII) 'Traffic and Transport Assessment Guidelines', (2014). The requirements for a TTA should be ascertained at pre-planning stage.

*Traffic and Transport Assessments shall project forward 5 years and 15 years after opening date in accordance with the TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines, and shall, in their analysis, consider all major road and traffic schemes and existing and proposed developments in an area (Refer also to Appendix 3 Development Management Thresholds).*

A Traffic and Transport Assessment has been prepared by Atkins, which takes account of all relevant guidance including the 'Traffic and Transport Assessment Guidelines' (2014), and concludes that:

*"The proposed development is considered appropriate, and it is considered that there are no traffic or transport impacts that would preclude this development from proceeding."*

### 12.4.3 Travel Plans

*Preparation of a travel plan required.*

A Mobility Management Plan has been prepared by Atkins.

### 12.4.4 Street Lighting

*The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015 and further updates and also the Council's 'Public Lighting Installations in Residential and Industrial Areas Guidance Document'.*

Residential areas are designed in accordance with EN13201-2:2015 Category P4 and spine residential road designed in accordance with EN13201-2:2015 Category P3. The lighting category was derived as per the methodology of EN13201-1:2014. All areas with column mounted luminaires meet the requirements of the Council's 'Public Lighting Installations in Residential and Industrial Areas Guidance Document'.

### 12.4.5.1 Parking Zones

*The propensity of people to choose non car modes is to a great extent determined by proximity to quality public transport as well as the range and accessibility, on foot or by bicycle, of services within an area. The County has therefore been divided into four Parking Zones, reflecting the varying degrees to which these criteria are generally met. Car parking within new developments will be in accordance with the standards set out in Table 12.5. The Parking Zones are indicative as set out on Map T2 and described below:*

(i) Parking Zone 1:

*This zone generally comprises the Major Town Centre areas of Dún Laoghaire and Dundrum together with the Blackrock District Centre area. These are areas, which are generally characterised by:*



- Access to a high level of existing and planned public transport services (rail and bus) with good interchange potential.
- A high level of service accessibility, existing and planned, by walking or cycling.
- A capacity to accommodate high density retail, office and residential developments.

*Within parking zone 1 Maximum car parking standards have been set for all uses including residential.*

#### *(ii) Parking Zone 2*

*This zone generally includes areas, which are within the following walking bands/catchments:*

- 10 minute walk of the proposed CBC 13 (Core Bus Corridor) from DCC boundary along the N11 to Kill Lane.
- 5 minute walk of the N11 proposed CBC from Kill Lane Junction to Bray.
- 10 minute walk of the proposed CBC 15 from DCC boundary to Blackrock.
- 5 minute walk of Kill Lane/Avenue/Mounttown bus route.
- 10 minute walk of Dart and Luas stations.

*Note: The N11 Quality Bus Corridor (QBC) and the Rock Road QBC will be replaced by CBC 13 and 15.*

*These are areas, which are generally characterised by:*

- Access to a good level of existing or planned public transport services.
- A good level of service accessibility, existing and planned, by walking or cycling.
- A capacity to accommodate a higher density of development than surrounding areas.

*Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. For residential uses reduced provision may be acceptable dependent on criteria set out in Section 12.4.5.2 below.*

#### *(iii) Parking Zone 3*

*This zone generally comprises the remainder of the County, excluding rural areas. These are areas, which are generally characterised by:*

- Access to a level of existing or planned public transport services
- A reasonable level of service accessibility, existing and planned, by walking or cycling
- A capacity to accommodate a higher density of development than rural areas.

*Within parking zone 3 maximum standards shall apply to uses other than residential where the parking standard shall apply. In zone 3 additional parking shall be provided for visitors in residential schemes at a rate of 1 per 10. In some instances, in zone 3 reduced provision may be acceptable dependent on the criteria set out in 12.4.5.2 (i) below with particular regard to infill/brownfield developments in neighbourhood or district centres.*

The proposed development is located in Zone 3 as defined under the *Development Plan* (see further details below). The location of car parking spaces and the car parking allocation can be seen on the Architect's drawings (Dwg No. PL601 –Car Parking Plan)

#### 12.4.5.2 Application of Standards

*In relation to the maximum standards, any proposals exceeding these standards will be permissible only in exceptional circumstances; such as where the Planning Authority consider that there is a specific requirement for a higher number of spaces. An example of this would be in instances where there are demonstrable benefits for the wider area through regeneration or similar urban and civic improvement initiatives.*

*In certain instances, within all zones, applicants may be required to provide the maximum number of spaces.*

*In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 or may consider that no parking spaces are required. Small infill residential schemes (up to 0.25 hectares) or brownfield/refurbishment residential schemes in zones 1 and 2 along with some locations in zone 3 (in neighbourhood or district centres) may be likely to fulfil these criteria.*

*In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority, having regard to criteria as set out below:*

##### *(i) Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5)*

- *Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The need to safeguard investment in sustainable transport and encourage a modal shift.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Existing availability of parking and its potential for dual use.*
- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*
- *The range of services available within the area.*
- *Impact on traffic safety and the amenities of the area.*
- *Capacity of the surrounding road network.*
- *Urban design, regeneration and civic benefits including street vibrancy.*
- *Robustness of Mobility Management Plan to support the development.*
- *The availability of on street parking controls in the immediate vicinity.*
- *Any specific sustainability measures being implemented including but not limited to:*
  - *The provision of bespoke public transport services.*
  - *The provision of bespoke mobility interventions.*

*Where a development site is located on the boundary of two or more parking zones, the level of parking provision will be decided at the discretion of the Planning Authority having regard to the criteria set out above. In Zones 1 and 2, where a deviation from the parking standards set out in Table 12.5 is being proposed, the applicant should engage with the Council at pre-planning stage regarding the acceptability of the proposal.*

*The recently adopted Compact Growth Guidelines supersede the contents of the Development Plan and the Apartment Guidelines, 2023 in relation to car parking. As the subject site is located in Parking Zone 3 ('Remainder of County (non-rural)') as per the Development Plan, the standards shown in the table below apply to the proposed*

development. It is noted that these are stated 'standards' for residential and not maxima or minima (see stated in Table 12.5 of the *Development Plan*).

Unit Type	Car Parking Standard in Zone 3	Visitor Car Parking in Zone 3	Units Proposed	Standard No. of Spaces Required
1-bed apartment	1 per unit	1 in 10 visitor parking for apartments	35	35 + 4 visitor = 39 No. spaces
1-bed duplex	1 per unit	1 in 10 visitor parking for apartments	18	18 + 2 visitor = 20 No. spaces
2-bed apartment	1 per unit	1 in 10 visitor parking for apartments	16	16 + 2 visitor = 18 No. spaces
2-bed duplex	1 per unit	1 in 10 visitor parking for apartments	96	96 + 10 visitor = 106 No. spaces
3-bed apartment	2 per unit	1 in 10 visitor parking for apartments	39	78 + 8 visitor = 86 No. spaces
3-bed duplex	2 per unit	1 in 10 visitor parking for apartments	87	174 + 18 visitor = 192 No. spaces
2 bed houses	1 per unit	N/A	38	38 No. spaces
3 bed + houses	2 per unit	N/A	158	316 No. spaces
<b>Total</b>			<b>487</b>	<b>c. 815 No.</b>

Table 12.5 further outlines 'maximum' standards for non-residential uses, as shown below.

Unit Type	Car Parking Standard in Zone 3	Area Proposed	No. of Spaces Required
Creche	1 per 40 sq m	691 sq m	17
Retail	1 per 50 sq m	4,594 sq m	92
Café & Restaurant	1 per 30 sq m	508 sq m	17
Community Facility	1 per 50 sq m	332 sq m	7
<b>Total</b>			<b>133</b>

The proposed development provides the following car parking spaces:

- 354 No. car-parking spaces to serve the 196 No. houses (2 No. per unit);
- 413 No. car parking spaces to serve 291 No. apartment and duplex units at a ratio of c. 1.4 No. spaces per unit (384 No. resident and 29 No. visitor). The *Development Plan* provides a requirement for 461 No. car parking spaces for the apartments and duplexes as a 'standard' and thus the provision is slightly lower than the standard outlined in the *Development Plan*;

- 87 No. car parking spaces to serve the non-residential element.

The residential car parking provision for the residential element (76 No. provided) is slightly lower than the standard requirement set out in the *Development Plan*. As detailed in Section 5.7, the development is also in accordance with the *Compact Growth Guidelines* which seeks a maximum of 974 No. residential parking spaces.

The car parking ratio is deemed appropriate for the location of the development in the centre of Kilternan Village, and having regard to the proposed mix of units and the availability of ample bicycle parking.

In addition, the non-residential maximum standard is 133 No. spaces, and the scheme provides 87 No. non-residential spaces, and thus the scheme meets the requirements of the *Development Plan* in this regard.

In addition, the *Development Plan* does allow for a deviation from the standards which it sets for car parking (apartments and duplexes are the only element below the *Development Plan* standards). Specifically, Section 12.4.5.2 of the *Development Plan* states:

*"In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority, having regard to criteria as set out below:*

- *Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The need to safeguard investment in sustainable transport and encourage a modal shift.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Existing availability of parking and its potential for dual use.*
- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*
- *The range of services available within the area.*
- *Impact on traffic safety and the amenities of the area.*
- *Capacity of the surrounding road network.*
- *Urban design, regeneration and civic benefits including street vibrancy.*
- *Robustness of Mobility Management Plan to support the development.*
- *The availability of on street parking controls in the immediate vicinity.*
- *Any specific sustainability measures being implemented including but not limited to:*
  - *The provision of bespoke public transport services.*
  - *The provision of bespoke mobility interventions."*

Informed by the foregoing, the following points summarise the justifiable reduction in the provided car parking provision:

- 1. Proximity to public transport services and level of service and interchange available.**



Number of bus services located in the vicinity of the site and Ballyogan Wood Luas stop within c. 2.3 km – c. 2.7 km (c. 26-31 minute walking distance).

**2. *Walking and cycling accessibility/permeability and any improvement to same.***

Good existing walking facilities and significant improvements to walking and cycling proposed.

**3. *The need to safeguard investment in sustainable transport and encourage a modal shift.***

Level of car parking looks to balance between provision of necessary amount while not adversely impacting on encouraging mode shift.

**4. *Availability of car sharing and bike / e-bike sharing facilities.***

Car sharing facilities provided on site.

**5. *Existing availability of parking and its potential for dual use.***

Mixed use nature of the development with different land uses and car parking demand and utilisation provides flexibility.

**6. *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).***

As noted above, mixed use nature of the development with different land uses and car parking demand and utilisation provides flexibility. It is noted that residents will be able to access the Neighbourhood Centre without access to a vehicle which is a positive benefit for the scheme.

**7. *The range of services available within the area.***

Development provides creche, restaurant community, commercial/retail use which would facilitate internal trips reducing car trips and car ownership.

**8. *Impact on traffic safety and the amenities of the area.***

Level of car parking is balanced so as to not adversely impact on safety.

**9. *Capacity of the surrounding road network.***

Reduced car parking versus *Development Plan* standards will result in few trips on the network that will have a positive impact on capacity versus higher parking version.

**10. *Urban design, regeneration and civic benefits including street vibrancy.***

Level of car parking is a balance to achieving an optimal urban realm that includes landscaping and amenity, play, safety and place making.

**11. *Robustness of Mobility Management Plan to support the development.***

A Mobility Management Plan is provided as part of the planning application.

**12. *The availability of on street parking controls in the immediate vicinity.***

N/A

**13. Any specific sustainability measures being implemented including but not limited to:**

- *The provision of bespoke public transport services.*
- *The provision of bespoke mobility interventions.*

N/A

A summary of the car parking provided in the proposed development is provided below:

Total Development Car Parking	
Residential Car Parking Provision	767
Non -residential Car Parking Provision	87
Total Development Car Parking	854

The total car parking provision includes 28 No. mobility impaired spaces, 100 No. electric vehicle spaces, 2 No. car share spaces, and 4 No. drop-off spaces/loading bays, in addition to 5 No. parent and child spaces.

#### **12.4.5.3 Car Parking – General**

*In instances where Table 12.5 does not specify a parking standard for a particular land use, the Planning Authority shall determine the parking requirements having regard to the assessment criteria for parking provision as set out above.*

*For both residential and non-residential car parking, 4% of car parking provision shall be suitable for use by disabled persons. In certain circumstances the Planning Authority may consider that a higher disabled parking content may be required depending on the nature of development. All disabled parking should be clearly marked and suitably sign posted for convenient access.*

*A minimum of 4% of car parking spaces provided shall be reserved for parent and child parking for commercial, retail, health, childcare, hotels, medical and leisure uses, but a higher number may be required depending on the nature and location of the development.*

Some 28 No. disabled parking spaces are provided for the development, which exceeds the required 4% of car parking spaces (500 No. parking spaces excluding the 354 No. parking spaces for houses which are adaptable for universal access). In addition, 5 No. parent and child parking spaces will be provided for the Neighbourhood Centre which represents more than 4% of the total non-residential spaces (total = 87 No.) and thus meets the requirement of the *Development Plan*.

#### **12.4.5.6 Residential Parking**

*Within Zone 1, car parking for residential developments has therefore been set as a maximum.*

*For apartment developments, car parking spaces should be allocated to residential units and visitor car parking. All visitor car parking is to be for short term use and not to be used by residents. Car parking shall be managed as such by a management company. For apartment developments car parking spaces associated with residential units must be sold in conjunction with the units and not sold separately, or let, to avoid take-up by non-residents and will be conditioned as such in the development management process.*

Any surface carparking should be suitably integrated into the site with soft landscaping proposals and have regard to SuDS.

Car parking for apartments is provided in accordance with this policy. Car parking spaces will not be sold separately.

#### **12.4.5.7 Parking and Loading Bays**

*In general, parking bays shall be a minimum 2.4 metres in width and 4.8 metres in length – with increased dimensions required for short-stay retail parking spaces and loading/set down parking areas. The configuration whereby double parking bays are placed length to length is discouraged. Carparking dimensions for in curtilage parking is set out in Section 12.4.8.1 (5.5 metres x 3 metres minimum). Parking bay widths suitable for people with disabilities shall be a minimum of 2.4 metres wide – with a 1.2 metres buffer on both sides – and 6.0 metres in depth.*

*Parking bay widths suitable for parent and child parking shall be a minimum of 3.3 metres wide, or 5.7 metres if paired with 0.9 metres hatching between the parking spaces.*

*Parking bays for people with disabilities or parent and child shall be located on firm, level ground, preferably at ground floor level, be in close proximity to access points/lifts and avoid potential conflict points such as ramps, steps etc. All parking bays should be in accordance with Part M of the Building Regulations. The location of disability or parent and child parking bays should be highlighted as part of pre-planning discussions.*

*Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development.*

Please see response below to each relevant element of this policy:

***In general, parking bays shall be a minimum 2.4 metres in width and 4.8 metres in length - with increased dimensions required for short-stay retail parking spaces and loading/set down parking areas. The configuration whereby double parking bays are placed length to length is discouraged. Carparking dimensions for in curtilage parking is set out in Section 12.4.8.1 (5.5 metres x 3 metres minimum).***

Response: Car parking with a minimum dimension of 2.4 metres x 4.8 metres is provided. In all cases the design of car parking accords with Section 4.4.9 of DMURS 'On Street Parking and Loading'. In-curtilage car parking does not accord with the Development Plan standards of 5.5 metres x 3 metres min. In-curtilage parking varies across the development. In general bays are 5.3m deep and 2.5m wide. There is various design reasons why this DLR design guidance has not been met including:

- Safety- wider and longer bays would encourage faster vehicle speeds when access and egressing the car parking area in a residential area where the design is to slow vehicle speeds and create a safe urban area in streets designed for people not cars.

- Design Criteria- This car parking requirement is excessive and in our design, the space is used to provide landscaping and access to dwellings, SuDS etc. rather than for parking a car. In all cases the design of car parking accords with DMURS Section 4.4.9 On Street Parking and Loading.

***Parking bay widths suitable for people with disabilities shall be a minimum of 2.4 metres wide – with a 1.2 metres buffer on both sides - and 6.0 metres in depth. Parking bay widths suitable for parent and child parking shall be a minimum of 3.3 metres wide, or 5.7 metres if paired with 0.9 metres hatching between the parking spaces.***

Response: Disabled car parking is provided in accordance with guidance (2.4 metres + 1.2 metre buffer x 6 metres). Parent and child bays provided comply with dimensions.

***Parking bays for people with disabilities or parent and child shall be located on firm, level ground, preferably at ground floor level, be in close proximity to access points/lifts and avoid potential conflict points such as ramps, steps etc. All parking bays should be in accordance with Part M of the Building Regulations. The location of disability or parent and child parking bays should be highlighted as part of pre-planning discussions.***

Response: Parking complies with Part M. Disabled spaces and parent and child spaces are annotated on MCORM Dwg No. PL601.

***Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development.***

Response: Loading facilities have been provided within the development in accordance with this guidance (4 No. drop-off/loading spaces provided in total which will be dual purpose).

#### **12.4.6 Cycle Parking**

Cycle parking should accord with the Council published – 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments' (2018) or any subsequent review of these standards. These are minimum cycle parking standards. In car parking Zones 1 and 2 these minimum standards should be exceeded. It is intended that the next review of the Council's cycle parking standards would be aligned with the 4 parking zones set out in Section 12.4.5.1 above.

Cycle parking is provided in accordance with these standards. As set out in the 'Traffic and Transport Assessment' prepared by AtkinsRéalis, the scheme is in accordance with the 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments'. We note that 823 No. bicycle parking spaces are provided for the development including space for cargo parking and accessible bikes.

##### **12.4.6.1 Requirements for New Development**

With increasing numbers of people cycling and a growing number of options for cycle mobility, including cargo bikes, bike trailers and e-bikes, all of which increase the range of uses and needs,



*which cycling can respond to, it is essential that well integrated, accessible and secure cycle parking, to cater for all types of cycles, is provided within new developments. This will help to encourage the use of new mobility solutions for everyday mobility needs such as shopping, delivery and school drop off / collection.*

*It is a requirement that, new residential developments of 5 residential units or more or non-residential type developments of 400 sq. m. or over, submit a Cycle Audit as part of the planning application. The Cycle Audit must be prepared by a suitably qualified person and shall clearly demonstrate, in plan format, how all the requirements of Council's Standards for Cycle Parking and Associated Cycling Facilities for New Developments, are met within the development.*

*For new residential developments of less than 5 units and non-residential developments of under 400 sqm planning applications shall include a Cycle Statement, setting out how it meets the requirements of Council's 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments' (2018).*

*The Quality Audit enclosed includes a Cycle Audit for the proposed development.*

#### **12.4.6.2      Cycle Parking Assessment Criteria**

*In general, new residential developments of 5 units or more or non-residential of 400 sq. m. or over will be assessed in accordance with the following criteria:*

- *Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of outsized formats (cargo bikes etc)?*
- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?*

*Where cycle parking cannot be conveniently provided within the development, a financial contribution of €500 per cycle parking stand will be required to provide alternative on-street cycle parking provision in the vicinity of the development.*

*Consideration should be given to requiring the provision of cycle parking-related directional signage, in particular for storage and commercial parking facilities. Bike lockers, showers and changing rooms should be available at final destination storage facilities (private).*

*For short-term cycle parking (e.g. for customers or visitors), cycle parking is required at ground level. This should be located within 25 metres of the destination in an area of good passive surveillance. Weather protected covered facilities should be considered where appropriate. Consideration should be given to using green roofs in the design of standalone cycle parking shelters. Appropriate cycle parking signage may also be required to direct cyclists to the end destination.*

*For long-term cycle parking (e.g. for more than 3 hours for residents, staff, students), secure covered cycle parking is a requirement. This should be conveniently located within 50 metres of the destination and located near building access points where possible.*

*In all cases it is a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations.*

*All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4 metres to facilitate access by cyclists.*

*Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments.*

The cycle parking provision is discussed in the Traffic and Transport Assessment prepared by Atkins. Section 6.3.6 of the *Traffic and Transport Assessment* prepared by AtkinsRéalis includes a Cycle Audit for the proposed development. The quality Audit also includes an independent Cycle Audit prepared by NRB Consulting Engineers. The scheme provides permeable pedestrian and cycle links to the surrounding area through the subject site.

#### **12.4.7 Motorcycle Parking**

*It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.*

The proposed development includes 24 No. motorcycle parking spaces which exceeds the requirement to provide four or more spaces per 100 No. car parking spaces (854 No. car parking spaces provided). Motorcycle parking is provided for residential apartments and duplexes and the Neighbourhood Centre, and can also be accommodated within the curtilage of each house.

#### **12.4.8 Vehicular Entrances and Hardstanding Areas**

##### **12.4.8.1 General Specifications**

*Vehicle entrances and exits shall be designed to avoid traffic hazard for pedestrians and passing traffic. Where a new entrance onto a public road is proposed, the Council will have regard to the road and footway layout, the traffic conditions on the road and available sightlines and will impose appropriate conditions in the interest of public safety. In general, for a single residential dwelling, the maximum width of an entrance is 3.5 metres. For a shared entrance for two residential dwellings, this may be increased to a maximum width of 4 metres. Each car parking space for a residential dwelling shall have a minimum length of 5.5 metres depth to ensure the parked car does not overhang onto the existing public footway and a minimum width of 3 metres to allow for clearance from nearby wall/steps/boundary.*

*Proper provision shall be made for sightlines at the exit from driveways in accordance with the requirements in DMURS, and as appropriate to the particular road type, and speed being accessed.*

*Automatic electronic gates into residential developments are not favoured and should be omitted. Electronic or automatic gates are not acceptable in terms of road safety unless the entrance is set back from the back of the footway, to avoid the roadway or footway being obstructed by a vehicle while the gate is opening. In general, outward opening gates will not be considered acceptable. A minimum of a 1.2 metres access path shall be provided for each dwelling. Sufficient space shall also be provided for refuse storage and service metres (Section 12.3.4.7) cycle storage (Section 12.4.6) and urban greening and SUDS (see Section 12.4.8.3).*

*All accesses are DMURS compliant, appropriate for traffic volumes and have been audited as part of Quality Audit.*

#### **12.4.11 Electrically Operated Vehicles**

*To encourage the use of Electric Vehicles (EV), in line with Council, National Policy and Standards, developments shall provide at minimum EV Charging points and infrastructure as follows:*

- *Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.*
- *New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.*
- *Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.*
- *Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.*

*Publicly accessible charge point parking space(s) should be clearly marked as being designated for EV charging. Appropriate signage indicating the presence of a Charge Point or Points should also be erected. All Charge Points fitted in publicly accessible areas should be capable of communicating usage data with the National Charge Point Management System and use the latest version of the Open Charge Point Protocol (OCCP). They should also support a user identification system such as Radio Frequency Identification (RFID). Publicly accessible EV Charging locations should also allow for ad-hoc payment methods for users. EV Charging enabling works for disabled and other reserved parking spaces should also be included in the development where these exist.*

*When detailed Guidance for EV vehicles which is currently in preparation by DLR in association with the other Dublin local authorities becomes available it shall replace the above standards.*

*The scheme complies with this policy in relation to electric vehicle parking by providing the following:*

- *Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car*

parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.

*1 No. space per 5 spaces will be fully equipped with a fully functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.*

- New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.

*Dwellings will be provided with appropriate infrastructure to enable installation of a fully functional EV Charging Point.*

- Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.

*1 No. space per 5 No. non-residential spaces will be fully equipped with a fully functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.*

- Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.

*1 No. space per 5 No. non-residential spaces will be fully equipped with a fully functional EV Charging Point. Ducting will be provided for all other spaces so that all other car parking spaces can be easily upgraded to allow conversion for electric vehicles.*

## **12.8 Open Space and Recreation**

### **12.8.1 Landscape Design Rationale**

Planning applications for both residential (10+ units or as required by the Planning Authority) and commercial (1,000 sq.m. or as required by the Planning Authority), including leisure and recreational facilities, should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority), for the consideration of the Parks and Landscape Services Department. Smaller schemes may also require a Landscape Plan to be submitted. All such requirements should be ascertained at pre-planning stage.

The design rationale shall set out and specifically indicate how the overall approach is ecologically resilient and provides varied landscapes that reflect the character of the area.

The landscape design rationale should also address the following:

- Ecosystems services and carbon capture approach.
- Urban Greening.



- *Biodiversity including pollinator friendly approach.*
- *Sustainable Drainage Systems.*
- *Maintenance without the use of chemical.*
- *Nature Based Play.*

*Such proposals shall include a scaled Landscape Plan(s) including:*

- *Cross-sections, where applicable, indicating the layout and hard and soft treatments of all boundaries, features, external areas, and green spaces.*
- *Specifications for materials, workmanship, and maintenance, together with proposed design details.*
- *Hard landscape details are to include, where applicable, any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features.*
- *Soft landscape details are to include, detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation, and spacings.*
- *A Landscape Plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and a defects liability clause.*
- *Regard should also be had to Policy Objective OSR14: Play Facilities and Nature Based Play.*

A 'Landscape Design Statement' and Drawings are included with this planning application prepared by NMP Landscape Architecture, which addresses these items where relevant. The scheme proposes pollinator species to benefit biodiversity, and the greening of the site will occur by providing 1,250 No. newly planted trees in addition to the 148 No. retained trees. The report provides details of Sustainable Drainage Systems, and we note that all external paved and landscaped areas will require low/minimal maintenance and can be maintained without use of chemicals. The scheme includes a wide variety of play spaces include nature based play e.g. natural stepping stones, planting, stepping logs etc. The scheme provides structured and unstructured play areas incorporating and facilitating nature-based play and maximises inclusivity and accessibility.

In addition, details of sections, materials, maintenance, hard landscaping and soft landscaping are provided throughout the documentation and the relevant policies of the *Development Plan* have been duly considered.

### **12.8.3 Open Space Quantity for Residential Development**

Table 12.8 within Section 12.8.3.1 of the *Development Plan* sets out the following public open space requirements for residential developments:

Location	Public Open Space Standards (minimum)
Residential Development in new residential communities as shown in the Core Strategy - Figure 2.9	15% (of site area)
Residential Development in the existing built up area	15% (of site area)
Institutional and Redevelopment of SNI use	25% (of site area)

The scheme requires 15% of public open space. The proposed development provides 23,636 sq m of public open space which represents 18% of the net site area. The open space strategy

has been detailed in the 'Landscape Design Statement' prepared by NMP Landscape Architecture:

Table 12.9 within Section 12.8.3.2 of the *Development Plan* sets out the following communal open space requirements for apartment developments:

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 bed) <sup>35</sup>	6 sq m
Two Bedrooms (4 bed)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

The proposed development has the following unit mix and associated communal open space requirement (apartment and duplexes only):

Unit Type	No. of Units	Communal Amenity Space Requirement Per Unit	Total Communal Space Required
Studio	-	4 sq m	-
One Bedroom	53	5 sq m	265 sq m
Two Bedroom (4 No. Person)	112	7 sq m	784 sq m
Three Bedroom	126	9 sq m	1,134 sq m
<b>Total:</b>	<b>291 No. (apartments and duplexes)</b>		<b>2,183 sq m</b>

The total communal open space requirement for the proposed development is 2,183 sq m and this total provided is 4,364 sq m. The communal open space provision significantly exceeds the requirements of the *Development Plan*.

Table 12.10 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for houses:

Unit Type	Minimum Area per Unit
1-2 bedroom	48 sq m*
3 bedroom	60 sq m
4 bedroom (or more)	75 sq m

\* may be acceptable in cases where it can be demonstrated that good quality usable open space can be provided on site.

Private open space has been provided for the houses in accordance with the requirements outlined in Table 12.10.

Table 12.11 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for apartment developments:

<sup>35</sup> The *Development Plan* states Two Bedrooms (3 bed) and Two Bedrooms (4 bed) however we assume that this should read Two Bedrooms (3 person) and Two Bedrooms (4 person)

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 persons)	6 sq m
Two Bedrooms (4 persons)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

Private open space has been provided for each apartment/duplex in the form of a balcony or terrace in line with the requirements outlined in Table 12.11.

### 12.8.5.3 Communal Open Space – Quality

*Communal amenity space within apartment and/ or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year in accordance with BRE 209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice', (2011). The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme. Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable.*

*Playgrounds in communal open space areas should be carefully sited within residential areas to ensure they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residences.*

*The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents within the development. In particular, accessible, secure and usable outdoor space is a high priority for families with young children, and for less mobile older people.*

As detailed in the 'Landscape Design Statement', there are a significant number of various play areas provided in the development. The play proposals include nature-based solutions and provide diverse play opportunities which consider the site's characteristics. A drawing entitled 'Play Area Plan' has also been included with the planning application (NMP Dwg No. L1\_102\_2).

A total of 4,364 sq m of communal open space has been defined as part of the landscaping proposition for the development. As shown in the 'Landscape Design Statement' by NMP Landscape Architecture, this includes structured and natural play spaces, which are carefully sited.

The proposed areas of public and communal open spaces will receive excellent sun on ground levels as detailed in the Daylight and Sunlight Assessment Report prepared by 3D Design Bureau. The only space that doesn't reach the minimum target for sun on ground is communal open space No. 2 space to the rear of Duplex Block A2. However, each property within Duplex A2 has a private amenity area capable of receiving the recommended minimum level of sunlight. The units also can access the large areas of public open space provided in the scheme.

Open spaces will be visible (thus will be naturally surveilled) and easily accessible for all persons, including for families with young children and less mobile older people. The

communal spaces will be appropriately maintained by a grounds maintenance contractor as detailed in the 'Lifecycle and Management Report'.

#### **12.8.5.4 Roof Gardens**

*Roof gardens are a valuable form of urban greening (see Section 3.4.4). Consideration of the use of roof gardens as communal open space shall be on a case by case basis and will not normally be acceptable on a site where there is scope to provide communal open space at grade, as roof gardens do not provide the same standard of amenity particularly to young children. Consideration must also be given to the overall design, layout, and location of the roof garden, including its height. For larger apartment schemes in excess of 50 units no more than 30% of the communal open space shall be provided by way of a roof garden.*

*While recognising that the primary form of communal open space should be provided at grade, where intensive green roofs are being provided in accordance with Section 12.8.6.3 and Appendix 7.2 there may be scope for their use as additional amenity areas in the form of roof gardens. In addition, there may be certain instances such as on smaller town centre infill schemes where there is only scope for a roof garden. Roof gardens will be considered subject to the following –*

- *Safety consideration including safe access by children.*
- *Wind and climate assessment.*
- *Daylight and sunlight assessment (on small town centre infill schemes, where all communal open space is provided by way of a roof garden, daylight and sunlight standards should be higher than minimum standards for more than 50% of the development).*
- *Maintenance issues.*
- *Provision of suitable landscaping plans which provide for a diverse range of plants which have year round interest, pollinator friendly and are suitably adapted to the rooftop conditions.*
- *Visual assessment.*
- *Proximity to vents.*

There are no roof gardens proposed in the subject development. There will be some communal open space provided at podium level but none at roof level.

#### **12.8.6.2 SuDS (Sustainable Drainage Systems)**

*SuDS measures, such as attenuation storage systems, including detention basins that come into regular operation after rainfall events, shall not normally be included in the calculation of open space provision. Where a SuDS scheme provides biodiversity and amenity value and is readily accessible for either use or enjoyment in most weather conditions, a proportion of the SuDS area could be incorporated as a component part of the communal or public open space provision.*

*This proportion will be decided by the Planning Authority on a case-by- case basis. The Council will also encourage the use of bioswales in roadside verges, and open spaces.*

*Further to Section 3.4.4 Urban Greening, data on all surface cover types shall be submitted to the Planning Authority as part of the storm water audit process (see 7.1.5 Storm Water Audit Procedure Appendix 7: Sustainable Drainage Systems). The Council will consult as appropriate with Iarnród Éireann in relation to any development where infiltration proposals will be in proximity to a railway cutting or tunnel.*



'No SuDS measures are included in the open space provision. Please refer to NMP Dwg No. L1\_102\_1, which details that any areas utilised for sustainable drainage have been annotated as 'incidental green open space', which is not included in the overall open space provision.

In addition, a Stormwater Audit has been completed and is included as Appendix 12.6 of the 'Engineering Infrastructure Report and Stormwater Impact Assessment' prepared by Roger Mullarkey and Associates.

### 12.8.6.3 Green Roofs/Blue roofs

*The use of green roofs/blue roofs in accordance with the requirements of the Dún Laoghaire Rathdown County Council's 'Green Roof Policy, (See Appendix 7.2) forms part of an integrated approach to the provision of green infrastructure. This approach takes particular account of the benefits in terms of SuDS provision, nature-based solutions, biodiversity benefits, urban greening, urban cooling, and the potential for additional amenity space, particularly in high density development contexts. The provision of green and blue roofs within any development, however, shall not normally form part of the overall minimum open space (public or communal) provision but should complement the required open space provided within the site. Applications for developments with a roof area  $\geq 300\text{sq.m.}$  shall provide Green Roofs in accordance with 'Dún Laoghaire – Rathdown County Council's Green Roof Policy' (2020).*

*Green or living roofs on smaller structures are also encouraged by the Council. These can function as smaller urban greening measures which as well as being a SUDS feature, are a useful wildlife habitat, can trap carbon and contribute to urban cooling. There is good potential for living roofs on bike and bin stores, bus shelters, detached habitable rooms and garages. Living roofs can be designed to incorporate a diverse range of pollinator friendly species which are drought tolerant and therefore do not require supplementary watering. Added features such as insect hotels and bird boxes can be incorporated into the design.*

The 'Engineering Infrastructure Report & Stormwater Impact Assessment' prepared by Roger Mullarkey and Associates sets out the following table in relation to the green roof provision:

• GREEN ROOF COVERAGE SUMMARY					
CELL REFERENCE	Extensive	Total Flat Roof Area (m <sup>2</sup> )	% Coverage of Green Roof	Min.% Req'd.	Pass/Fail DLRCC Min. %
Cell 3	253	292	87%	70%	PASS
CELL NC	1259	1384	91%	70%	PASS
CELL 09	599	689	86%	70%	PASS
CELL 06	421	452	93%	70%	PASS
CELL 13	61	70	87%	70%	PASS
CELL 16	47	54	87%	70%	PASS
APART'S (East site)	2485+2654	5566	92%	70%	PASS

Table 10 - Green/Blue Roof Coverage Summary

Figure 7.4: Extract from the *Engineering Infrastructure Report & Stormwater Impact Assessment* Demonstrating the Green Roof Coverage

(Source: Roger Mullarkey & Associates, 2024)

In relation to access for maintenance the report states:

*"Access for maintenance of the green roofs will be via the internal building stairwells and a roof hatch over or using a cherry picker where stairs access is not feasible... Detailed cross sections of the proposed roof build-up are shown on Dwg. No.2104C/316 included in the submission."*

#### **12.8.7.2 Boundaries**

*In all cases, suitable boundary treatments both around the side and between proposed dwellings shall be provided. In this regard, boundary treatments located to the rear of dwellings should be capable of providing adequate privacy between properties.*

*Boundaries located to the front of dwellings should generally consist of softer, more open boundary treatments, such as low-level walls/railings and/or hedging/planted treatments.*

*Provision of 'defensible' space, e.g. a planting strip, to the front of dwellings should be provided to contribute towards a sense of security within the home. Bin storage and/or utility meter alone, should not form any proposed defensible space areas.*

*Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule.*

*Please see 'Landscape Design Statement' and 'Boundary Treatment Plan' (Dwg No. L1\_101) by NMP Landscape Architects. As part of this, various boundary treatments are provided throughout the site layout including concrete post and timber panel fences between houses and to the rear of some houses, which will allow sufficient privacy between houses. A range of other boundary treatments are proposed such as hedge planting and boundary screening will be provided around street-level balconies/windows to provide privacy and a sense of defensible space.*

#### **12.8.8 Financial Contributions in Lieu of Open Space**

*Where the required open space standards cannot be provided, the Developer should indicate what is required as per the requirements of the County Development Plan (Section 12.8.), and what is to be provided to serve the development. Applicants should submit a clear schedule with public, private and communal open space requirements and proposals set out along with any short fall. Where the required open space cannot be achieved, the applicant shall provide a contribution in lieu of providing the full quantum of public open space. This shall apply to both residential (including Built to Rent) and non-residential/commercial developments. In some instances, this may relate to a more urban context, which allows the development to contribute to the urban realm and the liveability value of the development in the context of its location by way of a financial contribution. This will take the form of a contribution towards capital investment in improving the urban realm by creating and/or upgrading local parks and spaces and revenue costs for the maintenance of these spaces.*

*Public open space has been included as part of the proposed development in accordance with the Development Plan standards (e.g. in excess of 15% of the site area). Therefore, a financial contribution in lieu of open space is not required.*

### 12.8.9 Play Facilities for Apartments and Residential Developments

*In line with the 'Ready Steady Play! A National Play Policy', DCYA (2019) provision should be made to include suitable play opportunities for all ages of the child population within new residential developments. Design details relating to play areas shall be submitted as part of any relevant planning application to include a detailed specification of any playground to be provided and incorporate natural play, wherever possible.*

*Play Facilities should incorporate the Nature-based play philosophy and approach to play provision throughout the County (see Policy Objective OSR14: Play Facilities and Nature Based Play).*

*The Council will endeavour to ensure that all play facilities will be accessible and provide inclusivity. The Council will have regard to changing demographics in how and where it provides for play. Multiple Use Games Areas (MUGA) incorporating, for example basketball and 5-a-side facilities will be considered in any calculation of the 'Equipped Play Space' standards.*

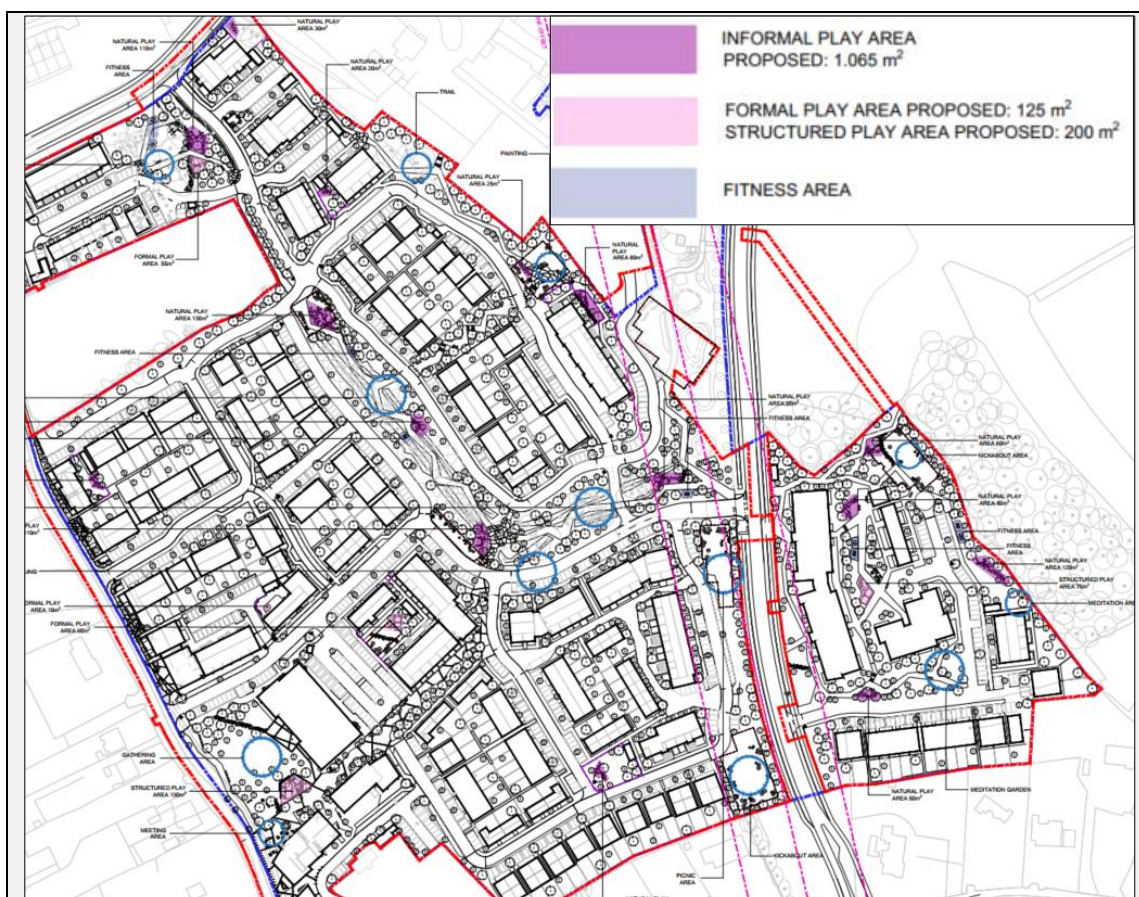
*In terms of play facilities for children regard shall be had to the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018', (or any superseding document), which request consideration of the recreational needs of children in the design of apartment schemes. Safety of children needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces.*

*Children's play needs around the apartment building should include:*

- *Within the private open space associated with individual apartments.*
- *Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- *Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

*The perimeter block with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled. The landscape design and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and this should be designed appropriately.*

*The proposed development provides a significant number of opportunities for children's play as detailed Dwg No. L1\_102\_2 'Play Area Plan' prepared by NMP Landscape Architecture. Please see below an extract from this drawing, which demonstrates the location of the various play spaces:*



**Figure 7.5: Proposed Play Space and Exercise Equipment**

(Source: NMP Landscape Architecture, 2024)

Therefore, it is clear that a wide range of play areas have been provided within the proposed development, which are located proximate to buildings and the development adheres to the requirements of the *Development Plan*.

### 12.8.11 Existing Trees and Hedgerows

*New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan.*

*Arboricultural Assessments carried out by an independent, qualified Arborist shall be submitted as part of planning applications for sites that contain trees or other significant vegetation. The assessment shall contain a tree survey, implications assessment and method statement. The assessment of the site in question will inform the proposed layout, in relation to the retention of the maximum number of significant and good quality trees and hedgerows. Tree and hedgerow protection shall be carried out in accordance with BS 5837 (2012) 'Trees in Relation to Design, Demolition and Construction – Recommendations', or any subsequent document. All requirements for Arboricultural Assessment should be determined at pre-planning stage.*



*The retention of existing planted site boundaries will be encouraged within new developments, particularly where it is considered that the existing boundary adds positively to the character/visual amenity of the area. New developments should have regard to the location of new buildings/extensions relative to planted boundaries. Prior to construction, the applicant shall provide details of adequate measures on site to protect all planting/ trees to be retained and this protection shall be maintained throughout the development during the construction period.*

*An ecological assessment of existing hedgerows shall be required where new developments potentially impact on their ecological importance. This should be carried out by a suitably qualified ecologist, and submitted at pre-planning stage, to inform the design and accompany the planning application. In addition, the approach set out in the 'How to Guide Hedgerows for Pollinators' should be followed, as appropriate.*

*Where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planting or replacement trees and other plant material. This will be implemented by way of condition. A financial bond may be required to ensure protection of existing trees and hedgerows during and post construction.*

An 'Arboricultural Assessment' has been carried out by Arborist Associates Limited. The 'Arboricultural Assessment' prepared notes that:

*"The current site layout has been finalized and modified based on the information provided in the initial condition tree assessment of the site area and the creation of the tree constraints plan (DWG. No.KVL001) which has resulted in changes in the layout of buildings and services and its construction plan to ensure that any impact on the trees to be retained have been kept to a minimum.*

*The objective of the proposed development layout was such as to try and retain as much of the important tree lines, groups and belts as possible and to incorporate these into the completed development where they will be an asset to the completed landscaped development and the surrounding area.*

*... In the design layout, great efforts have been made to retain as many of the better quality trees and in particular the trees within tree belts or groups which are of most visual value to the treescape of this area with the main tree belts running through the centre of the site being incorporated into its main open space areas.*

*The loss of the above listed tree vegetation is being mitigated against with the planting of trees, shrub and hedging as part of the landscaping of the completed development which will complement the development and its incorporation into the surrounding area. It will also help to provide good quality and sustainable long-term tree cover, and as this establishes and grows in size, it will be continuously mitigating any negative impacts created with the loss of the existing tree vegetation to facilitate the proposed development. See 'Landscape Architects Drawings' and 'Schedules' for detail.*

*In relation to the north-western corner, since the previous SHD application, the condition of some trees in this area in particular the Ash and Elm have deteriorated due to infection by 'Ash Dieback' and 'Dutch Elm Disease' and those most affected have been removed in consultation with Mr. Neil Molloy of DLRCC Parks Department as part of management to address safety to the surrounding properties and road. The boundary hedge and trees within along the 'Glenamuck Road' which is partly*

*within the site red line boundary have also been cut down by others in preparation of road improvement works in this area. As part of this revised site layout in the north west corner of the site area on the boundary with Rockville Woods, changes have been made to the layout to minimize impact on the trees in this area and 3 No. trees that had been identified for removal in the SHD Application have now been retained to help maintain the sylvan character in this area.*

*The planting strategy key factors are to:*

- *Create a sense of identity using trees, shrub and hedge planting.*
- *Create a robust landscape that performs all year round and is suitable for the current proposed use of this site area.*
- *Use vegetation to screen and enhance views.*
- *Use a more diverse mix of plant species that will include good pollinators.*
- *Plant robust species that tolerate drought and site-specific micro-climates*
- *Plant species that are maintenance friendly.”*

*The ecologist has also assessed trees and hedgerows as part of the EIAR Biodiversity Chapter.*

### **12.9.2 Noise Pollution and Noise Nuisance**

*The Planning Authority will have regard to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023', when assessing planning applications along major road and rail transport corridors – the objective being to reduce noise from new sources and to identify and protect and create areas of low sound levels.*

*Residential development should be set back from roads/rail lines such that amenities of residents are not unduly impacted upon by reason of noise. To address potential noise issues at post development stage, mitigation measures should be undertaken, where appropriate, between the residential development and road/rail line. At design stage consideration should be given to the location of bedrooms so as to ensure the least possible impact from noise sources. Similar mitigation measures may also be required when dealing with commercial development in close proximity to residential areas where there may be noise generated from the completed development – such developments will be assessed on a case by case basis.*

*The Planning Authority will use the Development Management process for larger developments or developments close to residential developments:*

- *To attach planning conditions on relevant permissions granted to reduce or prevent the development from causing any noise or vibration that might give reasonable cause for annoyance to persons in any premises in the neighbourhood, as per Section 34(4)(c) of the Planning Act.*

- *To require developers to produce a Sound Impact Assessment and Mitigation Plan where a noise-generating use is proposed and specialist input is deemed necessary, for any new development that the Planning Authority considers will impact negatively on pre-existing environmental sound levels.*
- *To require developers to produce an Acoustic Design Assessment (informed by guidance such as is set out in 'ProPG Planning and Noise', 2018, as referenced in the 'Dublin Agglomeration Noise Action Plan 2018 – 2023'), where a noise-sensitive use is proposed in an area that may have high pre-existing environmental sound levels.*
- *To ensure that future developments are designed and constructed in such a way as to minimise noise disturbances and prevent noise nuisance.*
- *Placing acoustic barriers between the noise source and residential units.*
- *Locating bedrooms as far away from noise sources as possible without compromising passive design principles.*
- *Locating windows away from noise sources if possible.*
- *Avoid hard exterior surfaces such as concrete paving that reflect sound rather than absorbing it.*
- *Locating noise sources away from property boundaries and noise sensitive areas.*
- *To incorporate 'Shared Spaces'/ 'Home Zones'/ or 'Streets for People' in new developments, which recognize that residential streets have multi- function uses for pedestrians, cyclists and vehicles - in that priority order.*
- *To interposing less-sensitive uses between noise sources and sensitive uses.*

*Where noise barriers are provided at the boundaries of large developments, access routes must be provided to allow for the ongoing maintenance of the barriers.*

An 'Acoustic Design Statement' has been prepared by RSK. This Report has been prepared with due consideration of Section 12.9.2 of the *Development Plan*. For example, the following mitigation measures are proposed in relation to noise:

- Provision of glazing with minimum sound insulation properties.
- Provision of acoustic attenuation to ventilation systems for dwellings outlined in the Report.

#### **12.9.4 Construction Management Plans**

*Construction Management Plans (CMP) for developments generating construction activity - containing measures to mitigate against the effects of the construction - shall accompany planning applications for development of 3 residential units or more and for all other developments measuring more than 500 sq.m. gross floor area. The requirement to submit a CMP is very much dependent on the location, scale, nature, and characteristics of the proposed development. Consequently, the stated thresholds above may be increased or relaxed at the discretion of the Planning Authority during pre-planning stage discussions.*

*The CMP will address issues such as traffic management, hours of working, delivery times, prevention of noise and dust, reinstatement of roadway lining and signing, repair of damage to footways and grass verges and the accommodation of worker parking within the development curtilage. Hours of construction and deliveries should normally be in accordance with the guidance set out in Section 12.9.5 below. Refer to Section 12.9.6 below for more detailed requirements of the CMP.*

*An 'Outline Construction Management Plan' prepared by AtkinsRéalis and a 'Construction Environmental Management Plan' prepared by Enviroguide Consulting are submitted with this planning application.*

### **12.9.6 New Development/Change of Use - Environmental Impacts**

*The Development Management Thresholds Information Document 2022 - 2028 (Appendix 3), a tool to assist in the preparation of Planning Applications, identifies thresholds for both residential and commercial development and outlines the package of environmental information that will be required at application stage.1*

*Applications for developments with a site area measuring 0.5ha, or greater and above 50+residential units shall include a Stormwater Audit in accordance with the Council's Stormwater Management Policy. (See Appendix 7.1 Stormwater Management Policy)*

*Applications for developments of 10+ residential units or <500sq.m. commercial shall include:*

*A Construction Management Plan that includes the following elements (which can be standalone documents):*

- i. A Construction Waste Management Plan.*
- ii. A Construction Environmental Management Plan.*
- iii. A Construction Traffic Management Plan.*

*An Operational Waste Management Plan.*

*The formulation of the above plans shall take account of the following:*

- i. DLR Guidance Notes for Environmental Management of Construction Projects.*
- ii. DLR Guidance Notes for Waste Management in Residential and Commercial Developments (see relevant excerpt in Appendix 6).*
- *Applications for developments of 20+ residential units or ≥500sq.m. commercial shall (in addition to the above):*
- *Submit, prior to commencement of development, details of a Sediment and Water Pollution Control Plan in relation to the construction phase of such developments.*
- *Implement an appropriate rodent/pest control plan.*

*Applications for developments of 50+ residential units or ≥1000sq.m. commercial shall (in addition to the above):*



- *Incorporate where appropriate land for the development of local 'Bring Centres' for recyclable materials, accessible to the general public.*
- *Include an assessment of the impacts of climate change on their development and make provision for these impacts – particularly relating to drainage design, waste management, and energy use.*
- *Be designed and constructed in accordance with the provisions of the Greater Dublin Strategic Drainage Study policy document titled 'New Development'.*

*All developments shall incorporate:*

- *Designs and layouts for basements and underground car parks that do not result in any potential for them to flood from within or without with particular emphasis on venting arrangements and access ramps.*
- *Sustainable Drainage Systems (SuDS) that balances the impact of urban drainage through the achievement of control of run-off quantity and quality and enhances amenity and habitat. The requirements of the UK's Construction Industry Research and Information Association (CIRIA) 'SuDS Manual', shall be followed unless specifically exempted by the Planning Authority.*
- *Waste storage facilities that are suitably located and designed and shall meet accessibility requirements in accordance with Part M of the Building Regulations and the provisions of Appendix 6 Waste Storage Facilities.*

*The Planning Authority will:*

- *Not permit culverting of streams unless considered absolutely necessary by the Council's Water Services Section.*
- *Encourage the opening up of existing culverts where practicable (in accordance with the recommendations of the GSDSDS).*
- *Require in developments adjacent to watercourses, that any structure be set back a minimum distance of 10 metres from the top of the bank to allow access for channel cleaning and maintenance, unless otherwise agreed with the Planning Authority.*
- *Only permit development when satisfied that new and existing developments are not exposed to increased risk of flooding and that any loss of flood storage is compensated for elsewhere in the catchment. Where required, a site-specific Flood Risk Assessment and Management Plan, shall be prepared for the site. This shall be carried appropriately qualified engineers with significant experience in flood modelling and mapping.*
- *When considering planning applications which include significant hard surfacing, attach conditions which seek to minimise and limit the extent of hard surfacing and paving as well as requiring the use of sustainable drainage techniques, including in particular permeable paving or surfaces such as gravel or slate chippings. The aim generally being to reduce run-off rates and flow volumes from parking areas as well as access roads. For all developments where existing grass or planted areas are being removed to install hard surfacing (for parking or other uses) compensatory soft surfacing shall be provided, or a reinforced grass area used instead of a hard surface.*

- *Ensure that the ongoing development of the County is undertaken in such a way in order not to compromise the quality of surface water (and associated habitats and species) and groundwater. Developments shall not give rise to the pollution of ground or surface waters both during construction and subsequent operation. This shall be achieved through the adherence to best practice in the design, installation, and management of systems for the interception, collection and appropriate disposal or treatment of all surface water and effluents.*
- *Where brownfield redevelopment is proposed, require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work.*

AtkinsRéalis have prepared an 'Outline Construction Management Plan' and Enviroguide Consulting have prepared a Construction Environmental Management Plan (which includes construction traffic and site access details). A 'Resource and Waste Management Plan' and an 'Operational Waste Management Plan' prepared by Enviroguide Consulting are also included with this planning application. These reports include details on these items where relevant.

#### **12.9.8 Telecommunications**

*In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:*

- *Compliance with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996), and Circular Letter PL 08/12 issued by the Department of the Environment and Local Government (as may be amended from time to time), and to other publications and material as may be relevant in the circumstances.*
- *On a map the location of all existing telecommunications structures within a 1km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the 'Code of Practice on Sharing of Radio Sites', issued by the Commission for Communications Regulation.*
- *To what degree the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area - e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc. – and the potential for mitigating visual impacts including low and mid – level landscape screening, tree-type masts being provided where appropriate, colouring, or painting of masts and antennae, and considered access arrangements.*
- *Any impacts on rights-of-way and walking.*
- *That the proposal shall not have a significant negative visual impact.*

The *Telecommunications Report* prepared by Independent Site Management Limited states the following:

*"To provide an adequate allowance to support the density and scale of the Development with the appropriate level of telecommunication channels (mobile*

*phone signal /voice & data services), the Applicant is seeking planning permission to install the following:*

- 9No. support poles, affixed to ballast mounts on the neighbourhood centre rising 2.8 metres above parapet level. These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each.
- 3No. support poles, affixed to the rear of the ballast mounts, rising 1.5 metres above roof level. These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each.
- Together with all associated telecommunications equipment and cabinets,
- To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds."

The proposed microwave links comply with the Guidelines and Circular and Section 12.9.8 of the *Development Plan* on the basis that:

Sub-Point 1 is satisfied as the proposal is designed to comply fully with the policies laid out in the DEHLG's Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities (1996) or any such guidelines which supersede it.

Sub-Point 2 is satisfied. The 'Telecommunications Report' details the existing telecommunications structures in the immediate area. The scheme will improve signal in the area. The council should note that only one existing telecommunication mast exists within a 1km radius, and it is already co-sharing and is at its maximum capacity.

Sub-Point 3 requires that impacts on the amenities of occupiers of nearby properties or the amenities of the area – e.g. visual impacts of the mast is assessed. Given the nature and scale of the development and placement of telecommunications infrastructure on the Neighbourhood centre block, it is considered that any impacts are considered to be moderate at worst and therefore with acceptable limits given the installation purpose. Wider and more distant public and private views from the surrounding area are restricted by the existing built development in the local area. The Verified Views and Computer Generated Images prepared by 3D Design Bureau demonstrate that the telecommunications infrastructure will not have a negative visual impact on the area.

Sub-Point 4 is satisfied. The application site is not located on a Right of Way and being on a rooftop where access is restricted to authorised persons only, there are no impacts on walking for the wider public.

Sub-Point 5 is satisfied. The telecommunications infrastructure has been sited at rooftop level of the Neighbourhood Centre and as demonstrated in the Verified Views and Computer Generated Images prepared by 3D Design Bureau, they will have minimal presence in the landscape and will not have any visual impacts.

### **12.9.9 Development and Overhead Power Lines**

*In relation to high voltage overhead electricity lines, development proposals within the distances specified below should contact the ESB in advance of completing or finalising designs etc. (i.e. prior to pre planning stage), so as to ensure that the relevant clearances are maintained from any High Voltage Overhead Electricity (HV OHL) Infrastructure.*

- For buildings in proximity to a 110kv overhead line, 23 metres either side of the centre line of a pylon.
- For buildings in proximity to a 220kv overhead line, 30 metres either side of the centre line or around a pylon.
- For buildings in proximity to a 400KV line, distance of 35 metres either side of the centre line or around a pylon.

*For buildings in proximity to a 10kv or a 38kv overhead line, no specific distance is specified. However, a site specific clearance may be required.*

*Clearances are Site and Transmission Line Span Specific. Clearance are sperate to construction safety clearances to be adhered to and maintained from the Overhead Line (OHL), which are specified in the ESB publication, 'Code of Practice for avoiding danger from overhead electricity lines'*

[https://www.hsa.ie/eng/publications\\_and\\_forms/publications/codes\\_of\\_practice/code\\_of\\_practice\\_for\\_avoiding\\_danger\\_from\\_overhead\\_electricity\\_lines.html](https://www.hsa.ie/eng/publications_and_forms/publications/codes_of_practice/code_of_practice_for_avoiding_danger_from_overhead_electricity_lines.html).

The proposed development has been designed to ensure that buildings' proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.

## **12.9.10 Public lighting**

### **12.9.10.1 Light Pollution**

*Lighting columns and other fixtures can have a significant effect on the appearance of buildings and the environment and where proposals for new lighting require planning permission, the Planning Authority will ensure that they are carefully and sensitively designed. Lighting fixtures should provide only the amount of light necessary for the task in hand and shield the light given out in order to avoid creating glare or emitting light above a horizontal plane. (Refer also to Section 8.2.4.4 and Section 5.1.3.2) For further guidance refer to the Institution of Lighting Professions (ILP) 'Guidance Notes for the Reduction of Obtrusive Light'.*

The lighting layout has been guided by the Institution of Lighting Professions (ILP) 'Guidance Notes for the Reduction of Obtrusive Light'. The lighting configuration has been carefully selected to achieve recommended illuminance levels whilst minimising light spill and avoiding over lighting. This is achieved by a combination of optimised column height, luminaire Wattage, optical setting and column /bollard location for each road/path configuration. All luminaires and bollards proposed have high performance street lighting specific optics designed to get the light onto the target area thus minimising spill light. All luminaires proposed have a 0-degree tilt. The ULR of all proposed column mounted luminaires is 0%. All column mounted luminaires are to be 2700K warm white colour temperature with peak wavelength of above 550nm. Bollards are to be 1750K colour temperature with peak wavelength of above 550nm. All column mounted luminaires are to be fitted with photocells which automatically switch luminaires on during night time and off during daytime. Additionally, all column mounted luminaires will automatically dim by 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.



## 12.9.10.2 Street Lighting

*The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015, and further updates.*

*In general, for security and road safety reasons, street lighting may be provided for car and cycle parking areas, new access roads and along cycle/pedestrian routes within new developments, all as per the Council requirements. Details of the column height and spacing, and lantern type, lighting class and lux levels and energy efficiencies shall be provided. Low pedestrian lighting bollards (1 metre to 2 metre height), under rail lighting and low-level wall mounted lighting (below 4m) are not recommended along pedestrian routes on electrical safety and maintenance grounds. Where new junctions are created as a result of new developments, additional lighting poles may be required on the public roads opposite the junction. In such cases an assessment of the adequacy of the street lighting should be undertaken with details of light intensity/ lux levels provided.*

Residential areas are designed in accordance with EN13201-2:2015 Category P4. The Lighting category was derived as per the methodology of EN13201-1:2014. The full technical details of the proposed luminaires and configuration are detailed on the public lighting calculation report and the public lighting layout. We have taken into consideration any existing luminaires in close proximity of the proposed new junctions and we have calculated the illuminance levels to meet an appropriate lighting levels of EN13201-2:2015 (C class). Bollard lighting is proposed for the woodland footpath sections which are areas of high ecological importance and the proposed bollard is IK10 impact resistant. Market leading LED light fittings have been selected to provide the required lux levels in all areas; LED's have excellent directional properties and the LED's proposed are warm white with a colour temperature of 2700 Kelvin (Woodland bollards to have 1750 Kelvin colour temperature).

The design will seek to provide only the minimum required lux levels, (5 lux average with 1 lux minimum on residential roads & pedestrian routes) ensuring no excessive lighting levels are provided. Column heights, positions and the luminaire photometry has been carefully selected for each area of the site. 6m columns have been selected for general public lighting, 5m columns for pedestrian routes. 8m Columns are required for the boundary link road. The LED column luminaires will be positioned with tilt angles of 0 degrees delivering 0% direct upward light spill. Column mounted luminaires and bollards are to automatically dim to 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.

## 12.10 Drainage and Water Supply

*All planning applications submitted shall clearly show existing and proposed water supply arrangements and surface and wastewater drainage proposals having due regard to SuDS (Refer also to Section 10.2.2.6).*

The existing and proposed drainage and water supply layout drawings are included in the application, and have been assessed in detail by Uisce Eireann, and have been SuDS audited in accordance with the DLRCC Stormwater Management Policy.

### 12.10.1 Flood Risk Management

*Applications shall adhere to the policies and objectives set out in Appendix 15 Strategic Flood Risk Assessment and Section 10.7 Flood Risk while having regard to 'the 'Planning System and Flood Risk Management' Guidelines for Planning Authorities' DEHLG (2009) and DECLG Circular PL2/2014.*

*The Flood Zone maps accompanying this Plan and Appendix 15 should be consulted at pre-planning stage and/or prior to lodgement of planning applications.*

Although the site is located in a Flood Zone C area (low risk), Roger Mullarkey & Associates have carried out a Flood Risk Assessment which is enclosed separately.

#### 8.1.4 Compliance with the Other Relevant Policy Objectives of the *Development Plan*

Please see below for policy objectives of the Development that are relevant to the subject development:

##### ***Policy Objective CS11: Compact Growth***

*It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES).*

The proposed scheme involves the development of a key underutilised site in Kilternan Village that is currently experiencing a transition and change in character from lower density dwellings to higher density residential schemes. Therefore, the proposed development will represent compact growth, which is in accordance with Policy Objective CS11.

##### ***Policy Objective CS14: Vacancy and Regeneration***

*It is a Policy Objective to address issues of vacancy and underutilisation of lands within the County and to encourage and facilitate the re-use and regeneration of vacant sites subject to the infrastructural carrying capacities of any area.*

The proposed development represents the appropriate densification of this strategically located site, contributing positively to the reuse and regeneration of underutilised lands in the area. The area has sufficient capacity to cater for the proposed development especially having regard to the Confirmation of Feasibility and Statement of Design Acceptance received from Uisce Eireann.

##### ***Policy Objective CA7: Construction Materials***

*It is a Policy Objective to support the use of structural materials in the construction industry that have low to zero embodied energy and CO<sub>2</sub> emissions. (Consistent with the RPO 7.41 of the RSES).*

Should a decision to grant planning permission be made, environmentally considerate options relating to construction and materials will be pursued.

##### ***Policy Objective CA8: Sustainability in Adaptable Design***

*It is a Policy Objective to promote sustainable approaches to the improvement of standards for habitable accommodation, by allowing dwellings to be flexible, accessible and adaptable in their spatial layout and design.*

A wide range of dwelling types and sizes are proposed. The needs of a variety of households will therefore be met. The following unit sizes are all proposed: 1 No. bedroom, 2 No. bedroom, 3 No. bedroom and 4 No. bedroom units, with the range of typologies split between houses, duplexes and apartments. The range of different typologies will cater for different/emerging living requirements and in terms of flexibility, the option to downsize or extend is provided for. This advantage of the adaptability of the proposed scheme will form a strong community within the development for many years to come.

Easy resident and visitor access is provided for throughout the scheme. The apartment buildings are subdivided into distinct zones, with level access for each core provided from the perimeter footpaths. In each apartment core there is a stairs and an accessible lift, serving all floors and linking car parking, bin stores and ancillary areas.

The design of the buildings are all in accordance with Part M of the Building Regulations and will also have regards to the principles of universal access. This will foster an inclusive approach to the design of the built environment.

#### **Policy Objective CA16: Low Emission Vehicles**

*It is a Policy Objective to support and facilitate the rollout of alternative low emission fuel infrastructure through the Development Management process, prioritising electric vehicle infrastructure.*

The proposed development provides 100 No. electric vehicle charging spaces. Additional ducting will be provided to allow for retrospective installation of additional charging points. In curtilage car parking spaces can easily be EV compliant.

#### **Policy Objective CA17: Electric Vehicles**

*It is a Policy Objective to support, the Government's Electric Transport Programme by progressively electrifying our mobility systems by facilitating the rollout of Electric Powered Vehicle Recharging Parking Bays across the County and on public roads and other suitable location. The provision of e-bike chargers will be supported subject to the availability of Funding. (Consistent with NSO 4 of the NPF and RPO 7.42 of RSES).*

As noted above in response to Policy Objective CA16, the proposed development provides 100 No. electric vehicle charging spaces. Additional ducting will be provided to allow for retrospective installation of additional charging points. In curtilage car parking spaces can easily be EV compliant.

#### **Policy Objective CA18: Urban Greening**

*It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).*

The proposed development provides a large quantum of public and communal open space including play spaces, kick-about spaces, pedestrian routes, outdoor gym equipment and seating areas. The SUDS measures include green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices. The open spaces will also provide pathways for pedestrians and cyclists especially due to the provision of the Dingle Way (Greenway) through the site which will connect Enniskerry Road to the future GLDR. Therefore, it is clear that the proposed development promotes urban greening and will contribute to healthy placemaking and supports the health and wellbeing of the living and working population.



### **Overarching Policy Objective PHP1:**

*That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:*

- *Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.*
- *Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment.*
- *Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.*

As set out in Section 5.2 and 6.1 of this Report, the proposed development aligns with the provisions of the NPF and the *Eastern and Midlands Regional Spatial and Economic Strategy*. The proposed development will create a new community in a Village Centre and in an area that is currently in transition from lower density dwellings to higher density schemes and will provide public and communal open spaces in addition to a Neighbourhood Centre, which will serve the future residents of the scheme and the wider public.

The proposed Neighbourhood Centre will positively contribute to the amenity of the existing and future resident population. The non-residential floorspace provision will be 6,125 sq m including anchor retail, retail/commercial, café, restaurant, creche and a community centre. The development will deliver 487 No. residential units and a Neighbourhood Centre in this new residential community and will thus accord with the Core Strategy by “*supporting the transition to a low carbon and climate resilient County through the implementation of a compact growth agenda, increased integration between land-use and transportation, increased sustainable mobility and, the sustainable management of our environmental resources*”, as set out in Section 2.4.2 of the *Development Plan*. The public transport in the area also has capacity to serve the proposed development which will continually be improved, however the site promotes walking and cycling given the permeable links and services proposed.

### **Policy Objective PHP2: Sustainable Neighbourhood Infrastructure**

*It is a Policy Objective to:*

- *Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- *Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- *Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.*

The scheme will provide much needed housing for the area and will also provide a Neighbourhood Centre in the centre of Kiltarnan Village, which will protect and improve sustainable neighbourhood infrastructure for the area. The scheme will be accessible and inclusive as confirmed by the 'Universal Access Statement' prepared by MCORM. The open spaces and commercial floorspace will be multi-functional as they will provide various spaces for toddlers, children and adults.

### **Policy Objective PHP3: Planning for Sustainable Communities**

*It is a Policy Objective to:*

- *Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide' and any amendment thereof.*
- *Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2).*
- *Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/ redevelopment areas and existing residential neighbourhoods.*
- *Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.*

We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the 'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities, 2024' (Compact Growth Guidelines), which is detailed in Section 5.7 of this Report.

The proposed development includes a range of non-residential uses including a 336 sq m community facility which will provide Sustainable Neighbourhood Infrastructure.

The 'Social Infrastructure Audit' notes that:

*"Given the size of the planned development it is judged that the proposed level of retail, community, restaurant/café space, and childcare space will greatly enhance the attractiveness and overall amenity of the village, and is likely to have a positive impact on the quality of services and facilities currently available in the locality".*

In addition, the public and communal open spaces are high quality, attractive and liveable spaces where the residents and/or public will have the opportunity to interact with each other ensuring an integrated community within the scheme which will create a healthy and attractive place to live.

### **Policy Objective PHP5: Community Facilities**

*It is a Policy Objective to:*

- *Support the development, improvement and provision of a wide range of community facilities throughout the County where required.*
- *Facilitate and support the preparation of a countywide Community Strategy.*

As noted above, a Neighbourhood Centre is provided within the proposed development which will improve the provision of community facilities in the County, especially with the provision of a new Community Centre.

### **Policy Objective PHP18: Residential Density**

*It is a Policy Objective to:*

- *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.*

The proposed development represents the consolidated and re-intensification of these underutilised, infill Village Centre lands with much needed higher density residential units (in addition to a Neighbourhood Centre), which will contribute positively towards addressing the national housing crisis. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised.

The area is currently transitioning in character from lower density housing to higher density development and thus the proposed development can be appropriately assimilated into the surrounding environment. Having regard to the results of the 'Daylight and Sunlight Assessment Report' and the 'Landscape and Visual Impact Assessment', the proposed development will not have a material impact on surrounding residential amenity. A fully detailed response to the relevant development management criteria of Chapter 12 is provided above in Section 7.1.3.

Please also see response to Policy Objective PHP20 below which is relevant to density and height.

### **Policy Objective PHP19: Existing Housing Stock – Adaptation**

*It is a Policy Objective to:*

- *Conserve and improve existing housing stock through supporting improvements and adaption of homes consistent with NPO 34 of the NPF.*

- *Densify existing built-up areas in the County through small scale infill development having due regard to the amenities of existing established residential neighbourhoods.*

The proposed development represents the appropriate densification of the subject lands, which includes removing the derelict dwelling known as 'Rockville' and associated derelict outbuildings, and the former Kiltiernan Country Market (wooden structure), and providing 487 No. residential dwellings and a Neighbourhood Centre. The subject scheme will result in the appropriate densification of an underutilised site, providing additional accommodation in lieu of the existing derelict dwelling and outbuildings, which are not considered to be distinctive or of architectural merit and do not represent sustainable use of well-located lands in the context of contemporary planning policy, which seeks to more appropriately and efficiently use scarce urban land. In addition, we note that these structures are not Protected Structures.

The proposed layout of the development includes a mix of houses, apartment blocks, duplexes and a Neighbourhood Centre with large open spaces and pedestrian routes, which allows the development to breathe and ensures the proposal is not monolithic. The 'Daylight and Sunlight Assessment Report' and the 'Landscape and Visual Impact Assessment' enclosed as separate documents both demonstrate that no material impacts will occur as a result of the proposed development.

The following 2 No. Policy Objectives relate to Building Height:

***Policy Objective PHP20: Protection of Existing Residential Amenity.***

*It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.*

***Policy Objective PHP42: Building Design & Height***

*It is a Policy Objective to:*

- *Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).*

This 'Planning Report & Statement of Consistency' have assessed the height of the proposed development against the Building Height Strategy in Appendix 5 (in particular Table 5.1) and it is considered that the proposed heights are appropriate and can be assimilated into the surrounding environment. As noted above, it is considered that the proposed scheme strikes a balance between respecting the surrounding environment and ensuring the development potential of a strategically positioned and underutilised plot is maximised. The existing structures on site to be demolished are not considered to be distinctive or of architectural merit and are not considered to represent sustainable continued use of strategic lands in the context of contemporary planning policy which seeks to more appropriately and efficiently use scarce urban land. In addition, we note that the structures are not Protected Structures.



The 'Daylight and Sunlight Assessment Report' and the 'Landscape and Visual Impact Assessment' enclosed as separate documents both demonstrate that no material impacts will occur as a result of the proposed development.

The following is also stated under Policy Objective PHP2o (black text) with a response provided underneath each point (in purple text):

*A response to each point of this policy is provided below in purple:*

- *On all developments with a units per hectare net density greater than 50, the applicant must provide an assessment of how the density, scale, size and proposed building form does not represent over development of the site. The assessment must address how the transition from low density to a higher density scheme is achieved without it being overbearing, intrusive and without negatively impacting on the amenity value of existing dwellings particularly with regard to the proximity of the structures proposed. The assessment should demonstrate how the proposal respects the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring uses.*

*Response: The proposed net density is 41.27 No. units per hectare and thus does not exceed densities greater than 50 No. units per hectare referenced in the item above.*

- *On all developments with height proposals greater than 4 storeys the applicant should provide a height compliance report indicating how the proposal conforms to the relevant Building Height Performance Based Criteria "At District/Neighbourhood/Street level" as set out in Table 5.1 in Appendix 5.*

*Response: Please see below response to the criteria outlined Table 5.1 of Appendix 5:*

*The guidance with respect to height is defined in the **Building Height Strategy** set out in Appendix 5 of the **Development Plan**, which has been prepared in accordance with the principles espoused in **Building Heights Guidelines**. Whilst the Council recognises the County's historic patterns of low-rise development, it acknowledges the trend towards taller developments and the national policy and environmental factors that drive this in support of more sustainable and resilient urban development and compact growth.*

*The basis for some additional height is driven by the principle of securing an increase in land-use intensities and residential densities, informed by planning policy at all levels that prioritises new development in existing urban areas. Therefore, with limited sites and site areas available, it is generally necessary, and indeed more sustainable, to 'build up, not out'.*

*Of relevance to the proposed development are the following policy objectives.*

*Policy Objective BHS 2 - Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan) states the following:*

*"It is a policy objective to promote and support proposed heights as set out in any approved statutory Local Area Plans and as set out for certain areas in this County Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan area and Dun Laoghaire Urban Framework Plan area).*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above on the basis of placemaking. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area."*

Policy Objective BHS 3 (Building Height in Residual Suburban Areas)<sup>36</sup> of the *Development Plan* states the following:

*"It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area."*

As detailed in Section 5.5, at present it is our opinion that the site does not naturally fall into either the BHS 2 or BHs 3 category set out in the *Development Plan*, but in our opinion is most suited to the BHS 3 category given that the Applicant has not had sight of a future Draft Local Area Plan at the time of writing this report (previous Local Area Plan has now expired).

In this regard, heights of up to 4 No. storeys partially over a podium/undercroft area have been proposed in one area of the site (eastern lands), with the rest of the site providing heights predominately consisting of 2 to 3 No. storeys, with a 4 No. storey pop-up in the Neighbourhood Centre. Although the height principally does not exceed the 4 No. storeys mentioned within BHS 3 and only provides increased height (due to level difference and provision of an undercroft on the eastern lands), we have provided an assessment of the scheme with Table 5.1 of the *Development Plan* to take the

<sup>36</sup> A "residual area", as defined by the Development Plan in the context of height, is noted as being an area "not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective, B, G or GB are termed residual suburban areas."

precautionary approach and to demonstrate that the proposed heights are appropriate. Please see assessment below:

At County Level	
<b>Criterion</b>	<i>"Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth."</i>
<b>Response</b>	<p>The proposed development will strongly support the attainment of the NPF's objectives. The current site is comprised of a derelict dwelling and outbuildings and the former Kilternan Country Market (wooden structure), which is an unsustainable use of lands in the centre of Kilternan Village. However, the proposed development's 487 No. units will yield a significantly more appropriate and sustainable use of the subject lands. This increase in housing delivery and density are supportive of, and in alignment with, the following National Policy Objectives (NPOs) of the NPF (amongst others):</p> <p><b>NPO 2a</b> – "A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."</p> <p><b>NPO 3a</b> – "Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."</p> <p><b>NPO 3b</b> – "Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints."</p> <p><b>NPO 5</b> – "Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."</p> <p><b>NPO 35</b> – "Increased residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."</p> <p>These NPOs seek to focus future development in existing urban environments, more efficiently using land resources and developing the critical mass required to provide public transport and local services and to sustain local businesses. Importantly, they also underpin the NPF's primary National Strategic Outcome (NSO), 'Compact Growth'.</p> <p>Further discussion in respect of the proposed development's alignment with the NPF is included in Section 5.2 of this Report.</p>
<b>Criterion</b>	<i>"Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport."</i>
<b>Response</b>	The subject site is considered eminently suitable for development given the site's location in the centre of Kilternan Village with the

	<p>Ballyogan Luas stop (green line) located c. 2.3 km – c. 2.7 km to the north-east (c. 26-31 minutes walking distance). Kilternan is also served by bus route Nos. 44, 63 and 118. These modes of transport provide direct connections to Dublin City Centre and institutions such as Dublin City University in Glasnevin, where residents can also easily transfer to other routes (red line) and modes (buses and trains) for onward connectivity. Although the site is not located within the stated distances of the Luas, Dart, Quality Bus Corridor or Bus Priority Route, it is considered that the site is well located proximate to modes of transport that provide direct connections throughout the city region, including the city centre, where residents can easily transfer to other routes and modes for onward connectivity.</p> <p>It is also noted that there are several proposed new bus routes for Kilternan within the Bus Connects scheme, such as Routes No. 88, L26, L13 and P13, which will all serve Kilternan Village and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area such as University College Dublin.</p> <p>The development itself proposes cycle parking that exceeds the minimum standards, with permeable connections provided through the site to the surrounding area.</p>
<b>Criterion</b>	<p><i>"Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area."</i></p>
<b>Response</b>	<p>It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing and a Neighbourhood Centre on underutilised lands at the heart of Kilternan Village, which will contribute positively towards addressing the national housing crisis and will provide a range of services and facilities for the future residents of the scheme and the existing and future residents of Kilternan. The existing topography of the site has been fully considered in the overall public realm and built fabric arrangements, particularly in the eastern portion of the lands where the streets and houses have been configured parallel to the prevailing contours. This enables Part M access to the achieved and easy gradients along streets and footpaths to be maintained.</p> <p>The proposed development will create a strong and defined frontage along Enniskerry Road, Glenamuck Road and the GLDR, and the Village Green and Neighbourhood Centre accessed from Enniskerry Road will be a significant planning gain for the local area. This will also support the activation of the site, which is currently muted due to inactive frontage provided at present.</p> <p>The design of the development and its layout is such that the scheme is predominately 2 to 3 No. storeys with a 4 No. storey Neighbourhood</p>



		<p>Centre block. On the eastern lands, due to level difference and provision of an undercroft/podium, the scheme may read as partially 5 No. storeys, which will read as a 'step up' design due to the level difference. The design layout ensures that the development integrates with the surrounding area, respecting the pattern of development present thereat, but allowing for a gradual uplift in height in a select location, and an increase in density overall. For example, the 4 No. storey Neighbourhood Centre fronting the Village Green along Enniskerry Road will enclose the Village Green and the apartment blocks on the eastern site will enclose the GLDR. Therefore, the subject scheme will result in the appropriate densification of a key infill site, providing much needed residential units, which will contribute towards addressing the national housing crisis.</p> <p>The subject scheme includes the provision of 23,636 sq m of public open space and 4,364 sq m of communal open space, which has been subject to detailed design by NMP Landscape Architecture.</p> <p>A 'Daylight and Sunlight Assessment' has been carried out by 3D Design Bureau, which demonstrates that no significant material impacts will occur to the surrounding properties.</p> <p>A 'Landscape Visual Impact Assessment' has been carried out as part of the EIAR, which demonstrates that there will be no significant adverse visual impacts as a result of the proposed development. Any significant changes to the landscape of the site (i.e. some removal of trees and hedgerows and general construction activity) will be counterbalanced with the implementation of new planting and maintenance of important hedgerows. CGIs prepared by 3D Design Bureau are included, which demonstrate the high-quality design of the proposed scheme.</p>
	<b>Criterion</b>	<i>"Protected Views and Prospects: Proposals should not adversely affect the skyline, or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view."</i>
	<b>Response</b>	It is evident that the subject site is not proximate to the principal line of sight of any Protected Views or Prospects. The 'Landscape Visual Impact Assessment' carried out as part of the EIAR demonstrates that no significant material impacts will occur to the surrounding properties.
	<b>Criterion</b>	<i>"Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan."</i>
	<b>Response</b>	The proposed development will be appropriately phased and will coincide with the construction of the Glenamuck District Roads Scheme (GDRS), which includes the Glenamuck District Distributor Road (GDDR) and Glenamuck Link Distributor Road (GLDR). As noted previously, construction has recently commenced, and it is estimated that the scheme will be completed in Q1 2026. The first phase of the proposed development is predicted to be fully constructed in July 2026

	<p>which lines up with the completion of the GDRS which will significantly improve road capacity in the area.</p> <p>Generally, with respect to water services, the Confirmation of Feasibility issued by Uisce Eireann confirmed the feasibility of connecting to their potable water and foul water networks. Further details of the proposals are contained in Roger Mullarkey &amp; Associates documentation enclosed. A Statement of Design Acceptance has also been received from Uisce Eireann.</p> <p>In relation to social and community infrastructure, the <i>Social Infrastructure Audit</i> is of relevance. The Report indicates the availability of provision of non-residential uses in the subject scheme will have a positive impact on the quality of services and facilities available in the area.</p>
<b>At District/Neighbourhood/Street Level</b>	
<b>Criterion</b>	<i>"Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape."</i>
<b>Response</b>	<p>The scheme has allowed and considered the GLDR along the north-eastern boundary of the site and the upgrades to the Glenamuck Road to the north of the site (Part 8 development).</p> <p>The design layout includes a number of open spaces available to the public such as the village green, a woodland walk, pocket parks, northern open space and the Dingle Way, which will positively contribute to the natural environment. The scheme retains a large quantum of trees within established tree belts on site.</p> <p>In terms of the built environment, there are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Areas at the subject site. There are Protected Structures on neighbouring lands including Rockville House to the north-east and Our Lady of the Wayside Church to the south-west, which have been duly considered as part of the overall layout. There has already been housing provided surrounding the Rockville Protected Structure and the proposed development will comprise a café and plaza area in addition to the Village Green opposite the Church, which will readily assimilate with this Protected Structure. We reiterate the permission has already been granted for Phase 1 of the LRD Application fronting Enniskerry Road, which includes this café/plaza/Village Green area opposite the church.</p> <p>The high-quality design of the proposed development will allow the development to be integrated into the surrounding area and as noted above, will positively enhance the legibility and streetscape of the surrounding area.</p> <p>The development will make a positive contribution to the neighbourhood and streetscape by: delivering various open spaces and permeable links; providing a Neighbourhood Centre which will serve the local community; activating the streetscape along Enniskerry Road</p>

		<p>and Glenamuck Road; enhancing the natural vegetation at the site by introducing a broad planting regimen; augmenting the critical mass required to sustain local service provision and businesses; and broadening the number and type of housing options available in the area.</p> <p>The design of the public and communal open space includes various play area, seating, lawns, fitness areas, planting and pedestrian paths, which will positively contribute to the natural environment.</p> <p>It is our opinion that, through a high standard of design, siting and layout and large public open spaces and linkages through the site, the proposed development knits successfully with the surrounding context.</p>
	<b>Criterion</b>	<i>"Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks. "</i>
	<b>Response</b>	<p>The 'Architectural and Urban Design Statement' prepared by MCORM Architects details the use of materials, the elevational treatment and the modulated height arrangement which breaks up the massing of the proposed development.</p> <p>The development provides houses, duplexes, apartments and a Neighbourhood Centre which naturally provides a varied design and thus the scheme will not be monolithic.</p> <p>The 'Architectural and Urban Design Statement' details the proposed materials and façade treatments which are also clear when viewing the Verified Views and CGIs prepared by 3D Design Bureau.</p> <p>It is clear that a significant effort has been made to provide a well-considered and interesting building form which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.</p>
	<b>Criterion</b>	<i>"Proposal must show use of high quality, well considered materials. "</i>
	<b>Response</b>	<p>As outlined in the 'Architectural and Urban Design Statement' by MCORM Architects, a mix of high-quality materials is proposed to deliver an attractive and hard-wearing development including:</p> <p><i>"The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.</i></p> <p><i>Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.</i></p>

		<p><i>The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development."</i></p> <p>Therefore, it is clear that high-quality materials have been well considered.</p>
	<b>Criterion</b>	<p><i>"Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage. "</i></p>
	<b>Response</b>	<p>The scheme includes c. 23,636 sq m high-quality public open space, including the Village Green fronting onto Enniskerry Road which will enhance the urban design context for the Village. In addition, some c. 4,364 sq m of communal open space will be provided for the residents of the apartments and duplexes.</p> <p>The scheme will provide active surveillance of the public and communal open spaces throughout the development. The new public spaces and linkages will significantly improve the public realm and will also enhance legibility and permeability in the area and thus represents a key planning gain for the wider neighbourhood. Importantly, the development will not be gated and will be open to the public.</p> <p>The 'Site Specific Flood Risk Assessment' prepared by Roger Mullarkey &amp; Associates and enclosed with this application concludes that:</p> <p><i>"As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.</i></p> <p><i>In accordance with the above noted Guidelines, as sequential staged approach was adopted in assessing the flood risk for the subject development.</i></p> <p><i>It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.</i></p> <p><i>It is concluded that a mixed residential and commercial development is appropriate on the subject lands.</i></p> <p><i>It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.</i></p> <p><i>Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding."</i></p>



	<b>Criterion</b>	<i>"Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved."</i>
	<b>Response</b>	<p>The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area, particularly due to the attractive links provided through the site including the Dingle Way, and the provision of a Neighbourhood Centre, which will serve the local community. The Village Green fronting onto Enniskerry Road will animate the streetscape and will make a positive contribution to the legibility of the Village. The existing underutilised site will be replaced with a high-quality development, which will be a positive insertion to the area.</p> <p>The subject scheme includes the provision of 23,636 sq m of public open space and 4,364 sq m of communal open space.</p>
	<b>Criterion</b>	<i>"Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area. "</i>
	<b>Response</b>	<p>The surrounding context of the subject site is generally characterised by a mix of low-density residential dwellings with a 4 No. storey apartment block abutting the north-eastern corner of the site. The scheme includes a Neighbourhood Centre, which will positively contribute to the mix of uses in the area. There is a large mix of dwelling types provided ranging from 1 No. bedroom apartments to 4 No. bedroom dwellings.</p> <p>The proposed scheme seeks to contribute towards reducing the deficit in Dublin's housing supply. The subject site is a key underutilised site in the village centre and provides a prime opportunity to provide a mixed-use development of suitable height, scale and mass that will result in the appropriate densification of the site.</p>
	<b>Criterion</b>	<i>"Proposal should provide an appropriate level of enclosure of streets or spaces."</i>
	<b>Response</b>	<p>The scheme will create visual interest in the streetscape along Enniskerry Road and Glenamuck Road and will positively contribute to placemaking through the linkages provided and the Neighbourhood Centre and Village Green fronting Enniskerry Road. In addition, the Neighbourhood Centre will appropriately enclose the new Village Green. Enniskerry Road will also be provided with a sense of enclosure by the proposed dwellings fronting the street and the Village Green opening onto Enniskerry Road will be a focal point for the community.</p> <p>This new frontage along the front of the site along Enniskerry Road will create a new urban edge with Enniskerry Road, redefining the sense of place in a positive way. Furthermore, this new interface will enhance the creation of placemaking and perception of this area now being an accessible public environment (that is lacking presently due to the current undeveloped nature of the site). We reiterate that this frontage along Enniskerry Road has already been granted under Phase 1 (DLRCC Reg. Ref. D23A/0616).</p>

		<p>The site has provide apartment blocks on the easter site which will face the GLDR providing a sense of enclosure.</p> <p>All open spaces within the site are overlooked by dwellings and or Neighbourhood Centre units.</p>
	<b>Criterion</b>	<i>"Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces"</i>
	<b>Response</b>	<p>A key element of the proposed development is the provision of a Neighbourhood Centre with associated Village Green in addition to the Dingle Way permeable link. Therefore, meaningful human contact is instilled within the essence of this development.</p> <p>The building types are varied throughout the site with open spaces provided in various locations. The benefit of this is that it will create a new urban grain and built rhythm across the site.</p> <p>This grain and the overall height of the development and their separation distances have been designed to be of a human scale and not overbearing; their height, positioning on the site and materiality mean that residents, visitors and passers-by can engage with them.</p> <p>The landscaped spaces have been carefully designed and planted to give them a sense of expanse, freedom, intimacy and enclosure in the seating areas and play spaces for example.</p> <p>Furthermore, the open spaces provide a variety of different features that will promote human interaction, engagement and socialising, including the seating areas, play spaces, greenway connectivity and woodland walk etc. This will be bolstered by the Neighbourhood Centre and the café and plaza area, which will promote the creation of a community within the development.</p>
	<b>Criterion</b>	<i>"Proposal must make a positive contribution to the character and identity of the neighbourhood."</i>
	<b>Response</b>	<p>The proposed development has been designed to make a positive and lasting contributions to the character and identity of the neighbourhood by following means:</p> <ul style="list-style-type: none"> <li>• Redefining the interface along Enniskerry Road and Glenamuck Road and providing an enclosure to the GLDR (under construction). This will create a new physical urban edge at the site which is otherwise missing due to the lack of activation from these underutilised lands;</li> <li>• The above approach to the design will also activate the streetscape in terms of both built-form (i.e. visually/aesthetically) and human presence and vibrancy, something that is lacking at this location;</li> <li>• A significant planting regimen is proposed that includes, amongst other features and plants, approximately 1,250 No. trees, which will create an attractive, lush and ecologically beneficial environment as they mature; and</li> </ul>

		<ul style="list-style-type: none"> <li>The addition of 487 No. residential units will broaden the total housing stock in the area, but also the housing types and sizes, thereby accommodating a broader range of residents (with different socio-economic backgrounds and incomes, life stages, household sizes, etc.) than would have otherwise lived here, which will support community building and integration.</li> <li>The provision of a Neighbourhood Centre with Village Green and plaza space will provide a focal point for the community, which will positively contribute to the character and identity of the neighbourhood.</li> </ul>
	<b>Criterion</b>	<i>"Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties."</i>
	<b>Response</b>	<p>The expired <i>Kilternan LAP</i> prescribes heights of 2-4 No. storeys for the subject lands. The height of the scheme is predominately 2 to 3 No. storeys throughout the majority of the scheme and thus should not be considered challenging from a height and massing perspective. The scheme only provides an increase in height to 4 No. storeys in the Neighbourhood Centre fronting the Village Green and 4 No. storeys partially over an undercroft/podium on the eastern lands.</p> <p>It is therefore considered that the scheme design strikes a balance between respecting the surrounding amenity and ensuring the development potential of a strategically positioned and underutilised plot is maximised, in the heart of Kilternan Village.</p>
	<b>At site/building scale</b>	
	<b>Criterion</b>	<i>"Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing. "</i>
	<b>Response</b>	<p>The proposed development has been carefully designed and modulated ensuring there is minimal impact on the daylight and sunlight reaching the existing and proposed residences on adjacent sites and minimal overshadowing impacts, and thus the scheme will have a limited impact on the amenity of surrounding properties. This is detailed in 3D Design Bureau's 'Daylight and Sunlight Assessment'.</p> <p>The results of the enclosed 'Daylight and Sunlight Assessment' demonstrate that the proposed scheme will not have an unacceptable or adverse impact on itself or on the surrounding properties with regard to daylight and sunlight. The proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight.</p>
	<b>Criterion</b>	<i>"Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met."</i>

	<b>Response</b>	<p>As noted above, the 'Daylight and Sunlight Assessment Report' and the 'Landscape Visual Impact Assessment' ultimately demonstrate that no material impacts will occur on neighbouring properties.</p> <p>The 'Daylight and Sunlight Assessment Report' prepared by 3D Design Bureau includes a detailed assessment and review of the proposed development and the possible impacts of the proposed development on existing and potential neighbouring developments. The reader is directed to review this Report, included as part of this application pack.</p> <p>As part of a compensatory design solution for the rooms that do not meet the recommended minimum average daylight factor, the proposed development has incorporated a number of compensatory design measures including larger apartment sizes, larger private amenity space and views to the public and/or communal open spaces.</p>
	<b>Criterion</b>	<p><i>"Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing."</i></p>
	<b>Response</b>	<p>As articulated in response to the preceding criteria, the proposed development has been carefully designed to ensure that it is not overbearing in its design. Its modulation of height and distributed massing results in a scheme that respects surrounding developments.</p> <p>In terms of overshadowing, the proposed development has little to no impact on neighbouring or residences.</p>
	<b>Criterion</b>	<p><i>"Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure."</i></p>
	<b>Response</b>	<p>There are no Protected Structures or Architectural Conservation Areas at the subject site. There are Protected Structures on neighbouring lands i.e. Rockville House to the north-east and Our Lady of the Wayside Church to the south-west, which have been duly considered as part of the overall layout. There has already been housing provided surrounding the Rockville Protected Structure and the proposed development will comprise a café, plaza area and Village Green opposite the Church, which will easily assimilate with this Protected Structure (and this area has already been granted permission under the Phase 1 development – DLRCC Reg. Ref. D23A/0616. Consequently, there are no protected or sensitive natural or built features at risk of negative impacts that may arise as a result of the proposed development.</p> <p>In turn, in our opinion there is no risk of negative impacts on any Architectural Conservation Areas or Protected Structures.</p>
	<b>Criterion</b>	<p><i>"Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development."</i></p>



<b>Response</b>	Careful regard has been given to the energy costs and efficiency associated with the proposed development, both in terms of its construction and embodied carbon and in terms of its operation and occupation. The longevity of the structures' lives, the energy systems proposed, demolition and construction phases have been considered as part of the design process. Although the delivery of the development will result in the emission/production of carbon and other greenhouse gases, it is intended that these will be minimised wherever practicable, with the net gain associated with the provision of a high-quality, sustainable development in the centre of Kiltarnan Village is considered to be significant. Further discussion in relation to these matters features in the 'Energy Statement' and 'Lifecycle and Management Report'.
<b>County Specific Criteria</b>	
<b>Criterion</b>	<i>"Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor."</i>
<b>Response</b>	This criterion is not deemed applicable to the subject site or proposed development.
<b>Criterion</b>	<i>"Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive."</i>
<b>Response</b>	<p>The proposed development will not be obtrusive and of a scale that would negatively impact on the quality and amenity value of the County's "high quality mountain foothill landscape". Furthermore, it is sufficiently distant and screened by topography, existing and future development and vegetation from the amenity areas at Ticknock, Ballyedmonduff, Three Rock and Fairy Castle to the south and south-west.</p> <p>No concerns in relation to impacts on preserved/protected views were raised in the <i>Landscape Visual Impact Assessment</i> prepared by Enviroguide Consulting (Chapter 10 of the EIAR). The EIAR notes that the Kiltarnan Plain and Ballycorus Enclosures are located at the foothills of the Dublin mountains and given their terrain and number of routeways traversing this plain, they are likely to be subject to the most pressure for long-term development which would significantly alter the existing landscape. However, the subject scheme will integrate into the surrounding environment with the majority of the scheme ranging from 2-3 No. storeys across the site with a 4 No. storey Neighbourhood Centre and 4 No. storey apartment blocks partially over undercroft/podium.</p>
<b>Criterion</b>	<i>"Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage)."</i>
<b>Response</b>	This criterion is not deemed applicable.

	<p><b>Criterion</b></p>	<p><i>"Specific assessments such as assessment of microclimatic impacts such as down draft."</i></p>
	<p><b>Response</b></p>	<p>The scheme predominately provides 2 and 3 No. storey units with a 4 No. storey Neighbourhood Centre in the centre/south-west of the site. On the eastern lands due to level difference and provision of an undercroft/podium, the scheme may read as partially 5 No. storeys, which will read as a 'step up' design due to the level difference. Therefore, a Wind Assessment is not required. Generally these assessments are required when buildings are at least 30 No. metres in height. The maximum height of the Neighbourhood Centre is c. 16.775 metres (with the telecommunications infrastructure extending to c. 19.775 metres). The maximum height of the apartment blocks is c. 14.3 No. metres, which is well below 30 No. metres.</p> <p>In addition, an 'Acoustic Design Statement' was prepared by RSK Ireland Limited. This Report considered the potential impact of the existing and future noise sources on future residents of the proposed dwellings, along with an assessment of the potential operational phase noise impact of the proposed development to nearby existing receptors.</p> <p>The 'Acoustic Design Statement' concludes the following:</p> <p><i>"The aim of this study is to assess the potential impacts to future residents and nearby receptors and to provide recommendations, where necessary, to the risk of nuisance arising from operational phase noise emissions.</i></p> <p><i>Baseline monitoring has found pre-existing noise levels are typical of a suburban location in the vicinity of a busy road network. Future noise emissions from the Glenamuck District Roads Scheme (GDRS) have been taken into account and resultant expectant future noise levels on site established via modelling.</i></p> <p><i>This report also considers the potential inward impact of road traffic on the proposed development. Assessment methodologies use guidance from The Professional Guidance on Planning &amp; Noise (ProPG), May 2017. The two primary stages of the ProPG assessment are the "Stage 1" initial noise risk assessment of the proposed site and "Stage 2" detailed appraisal of the proposed development and preparation of an Acoustic Design Statement.</i></p> <p><i>The site noise survey has also been used to assess the sites noise risk categories, as per the ProPG "Stage 1" assessment. The ProPG noise risk categories, for façades most exposed to road traffic, are Negligible to Medium/High for daytime and Negligible to High for night-time periods.</i></p> <p><i>Recommendation to mitigate noise emissions, as specified in the "Stage 2" Acoustic Design Statement, include the following:</i></p>

		<ul style="list-style-type: none"> <li>• Provision of glazing with minimum sound insulation properties as outlined in this document.</li> <li>• Provision of acoustic attenuation to ventilation systems for dwellings as outlined in this document.</li> </ul> <p><i>In the developments operational phase, criteria have also been set for new any new building services plant (i.e. such as may be required to service the retail/commercial elements of the proposed neighbourhood centre), to both existing and future residents, in accordance with the methodologies outlined in BS 4142:2014+A1:2019. It has been concluded that the likely noise impact of the development in its operational phase is not significant.</i></p> <p><i>In summary, it is considered that the site is suitable for residential development subject to the provision of the noise control recommendations as outlined in this report."</i></p>
	<b>Criterion</b>	<i>"Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas."</i>
	<b>Response</b>	<p>The potential for collision risk is low considering the building location, design and materials used.</p> <p>The Biodiversity EIAR Chapter prepared by Scott Cawley notes that the proposed development presents "a low risk in terms of collision".</p>
	<b>Criterion</b>	<i>"Assessment that the proposals allow for the retention of telecommunications channels, such as microwave links."</i>
	<b>Response</b>	<p>The 'Telecommunications Report' enclosed and prepared by Independent Site Management Limited notes the following:</p> <p><i>"To provide an adequate allowance to support the density and scale of the Development with the appropriate level of telecommunication channels (mobile phone signal /voice &amp; data services), the Applicant is seeking planning permission to install the following:</i></p> <ul style="list-style-type: none"> <li>- 9No. support poles, affixed to ballast mounts on the neighbourhood centre rising 2.8 metres above parapet level. These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna &amp; 1No. 5G antenna each.</li> <li>- 3No, support poles, affixed to the rear of the ballast mounts, rising 1.5 metres above roof level. These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each.</li> <li>- Together with all associated telecommunications equipment and cabinets,</li> <li>- To adequately screen the infrastructure, the support poles used for the antennae will be installed within Radio friendly GRP shrouds."</li> </ul>
	<b>Criterion</b>	<i>"An assessment that the proposal maintains safe air navigation."</i>

<b>Response</b>	The subject site is located c. 20 km from Dublin Airport and is not in proximity to any aerodromes, and the proposed development is not of sufficient height to require a detailed Aviation Impact Assessment.
<b>Criterion</b>	<i>"Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate."</i>
<b>Response</b>	An 'Appropriate Assessment Screening Report' and 'Environmental Impact Assessment Report' have been prepared and submitted with this planning application.
<b>Criterion</b>	<i>"Additional criteria for larger redevelopment sites with taller buildings"</i>
<b>Response</b>	This criterion is not deemed applicable.
<b>Criterion</b>	<ul style="list-style-type: none"> <li><i>"Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development."</i></li> </ul>
<b>Response</b>	<p>The subject scheme seeks to limit urban sprawl by making best use of an existing infill site in the centre of the village. The proposed scheme will make a positive contribution to the surrounding area by developing a key underutilised site and providing a high-quality residential development (which will contribute positively towards addressing the national housing crisis), which will also provide linkages through the site to the neighbouring Rockville development and the future GLDR. The newly proposed Neighbourhood Centre fronting the new Village Green and the café and plaza space will make a positive contribution to place making.</p> <p>The scheme will create visual interest in the streetscape along Enniskerry Road, Glenamuck Road and the GLDR and will positively contribute to placemaking through the linkages provided and the Neighbourhood Centre and Village Green fronting Enniskerry Road.</p> <p>The subject scheme includes the provision of 23,636 sq m of public open space and 4,364 sq m of communal open space, which has been subject to detailed design by NMP Landscape Architecture, and the scheme will provide focal point for the Village. The open spaces will enhance the quality of living of future occupants and the wider public and thus will positively contribute to place-making. The delivery of the scheme, which varies in height is considered as being of notable benefit to the community in terms of permeability and accessibility.</p> <p>The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an infill site in the centre of the village, providing varied and visually interesting façades for the surrounding streetscape, which will positively contribute to place-making.</p>
<b>Criterion</b>	<i>"For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met."</i>



<b>Response</b>	<p>The reader is redirected to the response in relation to daylight and sunlight above. The results of the enclosed 'Daylight and Sunlight Assessment Report' demonstrate that the proposed scheme will not have an unacceptable or adverse impact on itself or on the surrounding properties with regard to daylight and sunlight. The proposed development would not result in a significant reduction to the level of daylight and sunlight received by the surrounding existing properties. Future occupants will enjoy good levels of daylight within the vast majority of the proposed units as the units perform well in terms of Spatial Daylight Autonomy (c. 94% of rooms compliant with summer trees and c. 96% compliant with winter trees). The public and communal open spaces will all generally be provided well excellent levels of sunlight.</p>
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**Table 7.1: Responses to criteria in Table 5.1 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028's Building Height Strategy***

**(Source: Responses by Thornton O'Connor Town Planning, 2024)**

- On sites abutting low density residential development (less than 35 units per hectare) and where the proposed development is four storeys or more, an obvious buffer must exist from the rear garden boundary lines of existing private dwellings.*

Response: The location of the higher elements has been sensitively positioned i.e. facing the proposed Village Green and facing the GLDR on the eastern lands. Therefore, no obvious buffer is needed given the significant setbacks provided between neighbouring existing properties and the presence of newly proposed lower density dwellings.
- Where a proposal involves building heights of four storeys or more, a step back design should be considered so as to respect the existing built heights.*

Response: The scheme principally does not exceed 4 No. storeys. On the eastern lands due to level difference and provision of an undercroft/podium, the scheme may read as partially 5 No. storeys, which will read as a 'step up' design due to the level difference.

***Policy Objective PHP25: 'Housing for All – A new Housing Plan for Ireland, 2022'***

*It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in 'Housing for All – A new Housing Plan for Ireland, 2021'.*

The proposed development will deliver 487 No. much-needed dwellings in a sustainable location which will contribute towards the delivery of housing in the Dún Laoghaire-Rathdown area. The scheme will provide housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 50 No. Part V units. The scheme will provide 487 No. residential units in lieu of the existing structures on site (to be demolished), which are not considered to be of architectural merit and currently do not represent sustainable use of accessible and infill urban lands. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All* (please also refer to Section 5.4 of this report).

### **Policy Objective PHP26: Implementation of the Housing Strategy**

*It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028.*

The scheme will provide 53 No. 1 bedroom units, 150 No. 2 bedroom units, 236 No. 3 bedroom units and 48 No. 4 bedroom units. Therefore, it is clear that a variety of dwelling sizes are provided, which will serve a wide cohort of persons and will facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028 in this built-up area.

### **Policy Objective PHP27: Housing Mix**

*It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.*

The scheme will provide 53 No. 1 bedroom units (35 No. apartments and 18 No. duplexes), 150 No. 2 bedroom units (38 No. houses, 16 No. apartments and 96 No. duplexes), 236 No. 3 bedroom units (110 No. houses, 39 No. apartments and 87 No. duplexes) and 48 No. 4 bedroom units (48 No. houses). Therefore, it is clear that a variety of unit types and sizes are provided, which will serve a wide cohort of persons.

### **Policy Objective PHP30: Housing for All**

*It is a Policy Objective to:*

- *Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.*
- *Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*
- *Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community.*

The proposed development has been designed to be universally accessible as detailed in the Universal Access Statement prepared by MCORM. The provision of a mix of unit sizes including some smaller 1 and 2 No. bedroom units, will provide the opportunity for downsizing within the existing community.

### **Policy Objective PHP31: Provision of Social Housing**

*It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.*

Some 50 No. Part V units are provided in accordance with Part V of the *Planning and Development Act 2000 (as amended)*. We note that the reduced 10% Part V provision applies to 97% of the lands, which were purchased by the Applicant on 22nd December 2020. The remaining 3% of the lands (the former Kiltarnan Country Market site) were purchased post

August 2021 and therefore a 20% Part V provision is applicable to 3% of the total land. The total development provides 487 No. residential units which can be broken down as follows:

- 97% of 487 No. units = 47 No. units
- 3% of 487 No. units = 3 No. units

Therefore, some 50 No. Part V units are required, which have been provided as part of the proposed development.

### **Policy Objective PHP35: Healthy Placemaking**

*It is a Policy Objective to:*

- *Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- *Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013).*
- *Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.*

A full response to the relevant Policy Objectives of the NPF are discussed in Section 5.2 of this Report and all relevant Policy Objectives of the RSES is provided in Section 6.0 of this Report. We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the 'Sustainable Residential Developments and Compact Settlements–Guidelines for Planning Authorities, 2024' ("Compact Growth Guidelines"), which is detailed in Section 5.7 of this Report. The proposed development has fully considered its context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design, as discussed throughout this Report.

### **Policy Objective PHP36: Inclusive Design & Universal Access**

*It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.*

The proposed development has been designed to be universally accessible as detailed in the Universal Access Statement prepared by MCORM.

### **Policy Objective PHP37: Public Realm Design**

*It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.*

The scheme will enhance this area and will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm. The development will provide new pedestrian connections especially due to the provision of the

Dingle Way which will link Enniskerry Road with the future GLDR. This will improve permeability for all pedestrians. A number of access points have been provided for the residents and public to access the residential units and the Neighbourhood Centre, which will open up the site and provide a more active streetscape along Enniskerry Road and Glenamuck Road, which will improve the public realm. The eastern site will also be accessible from the GLDR, which is proposed to be completed by Q1 2026.

#### **Policy Objective PHP40: Shared Space Layouts**

*It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).*

The development has been designed in accordance with DMURS, as demonstrated in the enclosed 'DMURS Statement' by Atkins. The subject scheme provides a public realm that prioritises ease of movement for pedestrians and bikes.

#### **Policy Objective PHP41: Safer Living Environment**

*It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.*

The scheme will provide a safe environment for all, particularly as the scheme prioritises pedestrian and cyclist movement and given that the scheme has been designed to be accessible for all ('Universal Access Statement' prepared by MCORM).

#### **Policy Objective PHP44: Design Statements**

*It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.*

An 'Architectural and Urban Design Statement' prepared by MCORM accompanies this planning application which has been prepared with reference to the "Sustainable Residential Developments and Compact Settlements – Guidelines for Planning Authorities, 2024" (Compact Growth Guidelines) which have replaced the 'Urban Design Manual – A Best Practice Guide' (2009). In terms of adaptability, the ground floor of the commercial units are provided with floor to ceiling heights of 3.3 – 3.75 metres, the apartment blocks are provided with a minimum ground level floor to ceiling height of 3.3 metres and upper levels provide heights of 2.775 metres. The duplexes all meet minimum requirements of 2.7 metres with the majority providing ground floor to ceiling heights of 2.925 metres. All upper levels of the duplexes have been designed with floor to ceiling heights of 2.585 – 2.7 metres, which is considered good practice. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications.



## Policy Objective RET7: Neighbourhood Centres

*It is a Policy Objective of the Council to support the development of the Neighbourhood Centres as the focal point of the communities and neighbourhoods they serve, by way of the provision of an appropriate mix, range and type of uses – including retail and retail services – in areas zoned objective 'NC' subject to the protection of the residential amenities of the surrounding area.*

The proposed Neighbourhood Centre will accord with this Policy Objective as it will represent a focal point for the community. The mix, range and type of units proposed will adequately serve the existing and proposed residential developments in the area and is in accordance with the requirements set out in the Braniff Report (as requested under the Phase 1 RFI – DLRCC Reg. Ref. D23A/0616).

Furthermore, 'The RSGDA<sup>37</sup> explains that Neighbourhood Centres usually contain convenience retail ranging in size from 1,000-2,500 sq. m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population.'

The scheme provides an anchor retail store of c. 1,310 sq m in addition to further retail/commercial floorspace (c. 3,284 sq m) and a restaurant (c.182 sq m), a creche (c. 691 sq m), café (c. 326 sq m), and a community facility (c. 332 sq m).

## TRANSPORTATION

### **Policy Objective T1: Integration of Land Use and Transport Policies**

*It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high quality public transport systems. (Consistent with NSO 1, NPO 26 of the NPF, 64, RPO 4.40, 5.3, 8.1 and Guiding Principles on Integration of Land Use and Transport of the RSES)*

The proposal actively encourages the use of sustainable modes of transport especially due to the site's location within the Village Centre and a new Neighbourhood Centre will be provided which will afford residents of the scheme and the local community the opportunity to walk or cycle to the Neighbourhood Centre facilities. In addition, the scheme promotes sustainable modes of transport through the provision of permeable links such as the Dingle Way and linkages to the surrounding developments etc. In addition, the scheme proposes 100 No. electric vehicle spaces, 2 No. car share spaces and 823 No. bicycle parking spaces.

### **Policy Objective T11: Walking and Cycling**

*It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)*

The proposed development will improve the public realm in the area and will provide new pedestrian and cyclist connections to the surrounding developments/future GLDR, which will improve permeability for all pedestrians.

<sup>37</sup> Retail Strategy for the Greater Dublin Area

### **Policy Objective T17: Travel Plans**

*It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)*

A Mobility Management Plan has been prepared by AtkinsRéalis.

### **Policy Objective T18: Car Sharing Schemes**

*It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.*

Some 2 No. car share spaces are proposed as part of the subject development.

### **Policy Objective T19: Carparking Standards**

*It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.*

The relevant parking standards of Section 12.4.5 are discussed earlier in this report. The development promotes sustainable modes of transport, especially due to the site's location in the Village Centre. The scheme also promotes walking and cycling from the site and 823 No. bicycle parking spaces are proposed.

### **Policy Objective T22: Taxi/Minibus/ Hackney Transport**

*It is a Policy Objective to facilitate the provision of taxi/minibus/hackney transport as a feeder service to major public transport corridors and to encourage the provision of taxi ranks at DART Stations, Luas stops, key bus stations and at other appropriate locations - including within larger residential, commercial and/or mixed-use developments.*

The scheme includes 4 No. set down spaces which can facilitate taxi drop off for the development.

### **Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits**

*It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.*

The traffic documents has been prepared in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014).

### **Policy Objective T27: Traffic Noise**

*It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.*

An 'Acoustic Design Statement' has been prepared by RSK Ireland Limited which concludes that:

*"It is considered that the site is suitable for residential development subject to the provision of the noise control recommendations as outlined in this report."*

The noise control recommendations require the provision of glazing with minimum sound insulation properties and the provision of acoustic attenuated ventilation with minimum sound insulation properties as outlined in the Report. Therefore, it is clear that the traffic noise levels in the area have been considered as part of this planning application.

### **Policy Objective T31: Accessibility**

*It is a Policy Objective to support suitable access for people with disabilities, including improvements to transport, streets and public spaces. Accessibility primarily concerns people with reduced mobility, persons with disabilities, older persons and children. (Consistent with RPO 9.1 and 9.10 of the RSES)*

The Universal Access Statement prepared by MCORM outlines that the Design Team is firmly committed to achieving universal access.

## **GREEN INFRASTRUCTURE AND BIODIVERSITY**

### **Policy Objective GIB2: Landscape Character Areas**

*It is a Policy Objective to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County's landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the 'Draft Guidelines for Landscape and Landscape Assessment' (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with 'A National Landscape Strategy for Ireland – 2015-2025'. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage, and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.*

The proposed development does not affect any Landscape Character Areas, namely the Kiltarnan Plain, Ballycorus and Carrickmines.

### **Policy Objective GIB5: Historic Landscape Character Areas**

*In assessing development proposals and in the preparation of plans, it is a Policy Objective to have regard to the recommendations and findings of the Historic Landscape Character Assessments (HLCA), already undertaken for a number of the urban-rural fringe areas of the County most likely to come under development pressure.*

The proposed development does not affect any Historic Landscape Character areas.

### **Policy Objective GIB6: Views and Prospects**

*It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.*

There are no Preserved/Protected Views/Protected Areas within the study area and the proposed development does not affect any protected view identified in the County.

The protected views *Carrickgollogan from the Enniskerry Road* (south of Kiltiernan Village) and *Three Rock Mountain and Two Rock Mountain from the Enniskerry Road* (Sandyford-Kiltiernan area) and *Sandyford Village* are not affected by the proposed development.

### **Policy Objective GIB20: Biodiversity Plan**

*It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2026.*

The scheme will provide a planting scheme that includes a range of pollinator-friendly species to encourage biodiversity. In addition, as set out in the 'Landscape Design Statement' by NMP Landscape Architects, some 1,250 No. trees have been proposed which will improve biodiversity whilst also providing aesthetic and/or functional characteristics.

### **Policy Objective GIB21: Designated Sites**

*It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.*

The 'Appropriate Assessment Screening Report' prepared by Scott Cawley concludes the following:

*"Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.3 above. In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.*

*Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)."*

### **Policy Objective GIB28: Invasive Species**

*It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).*

Invasive species are dealt with in the Biodiversity EIAR Chapter prepared by Scott Cawley (none recorded on site).



### **Policy Objective GIB29: Nature Based Solutions**

*It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.*

Included as part of the landscape plan are nature-based solutions such as natural and formal tree and shrub planting and proposed pollinator species.

## **OPEN SPACE, PARKS AND RECREATION**

### **Policy Objective OSR4: Public Open Space Standards**

*It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual - A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2020).*

The scheme provides high-quality public and communal open spaces. We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the "Sustainable Residential Developments and Compact Settlements – Guidelines for Planning Authorities, 2024" ("Compact Growth Guidelines"), which is detailed in Section 5.7 of this Report. Please see Section 5.6 for a response to the 'Sustainable Urban Housing: Design Standards for new Apartments, 2023).

### **Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking**

*It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilitates people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16).*

The landscape proposal incorporates a network of well-connected external spaces designed to encourage active play, exercise and social interaction, as well as passive relaxation.

### **Policy Objective OSR7: Trees, Woodland and Forestry**

*It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach.*

The scheme retains as many trees as possible and a woodland walk is proposed for example, which will have environmental, climatic and educational benefits.

### **Policy Objective OSR13: Play Facilities and Nature Based Play**

*It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.*

*The proposed play strategy for this scheme provides for natural and formal play spaces throughout the development.*

## **ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK**

### **Policy Objective EI3: Wastewater Treatment Systems**

*It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.*

*It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution.*

*It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.*

*The proposed development is supplied by a public foul sewerage network.*

### **Policy Objective EI4: Water Drainage Systems**

*It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)*

*The proposed development has a completely separated drainage system provided.*

### **Policy Objective EI6: Sustainable Drainage Systems**

*It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).*

*The proposed development provides a significant amount of SuDS elements including green roofs, permeable paving, filter drains, rainwater butts, swales, tree pits, bio-retention area, silt-trap/catchpit manholes, hydrobrakes, petrol interceptor and stone lined voided arch retention storage devices.*

### **Policy Objective EI9: Drainage Impact Assessment**

*It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council's Development Management*

Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).

In accordance with the requirements of the Stormwater Management Policy, a Stormwater Audit has been carried out by Punch Consulting Engineers for the proposed development and is included in Appendix 12.6 of the 'Engineering Infrastructure Report & Stormwater impact Assessment' by Roger Mullarkey & Associates Consulting Engineers.

#### **Policy Objective EI10: Storm Overflows of Sewage to Watercourses**

*It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region's receiving waters are met in a cost effective manner.*

The proposed development has a completely separated drainage system provided and no overflow of sewage is practically feasible.

#### **Policy Objective EI11: Resource Management**

*It is a Policy Objective to implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources. Underpinning this objective is the requirement to conform to the European Union and National Waste Management Hierarchy of the most favoured options for waste as illustrated below subject to economic and technical feasibility and Environmental Assessment. (Consistent with RPO 10.25 of the RSES)*

The Eastern-Midlands Region Waste Management Plan 2015-2021 has informed the preparation of the 'Operational Waste Management Plan' prepared by Enviroguide Consulting.

#### **Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling**

*It is a Policy Objective:*

- *To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- *To aim to provide a supporting waste management infrastructure in the County for the processing and recovery of waste streams such as mixed municipal waste in accordance with the proximity principle.*
- *To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial*

waste as the best method to ensure the quality of waste presented for recycling is preserved.

- To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.
- To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.
- To require the inclusion of such centres in all large retail developments to maximise access by the public.
- To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities (an excerpt of which is contained in Appendix 6).

The waste strategy for the proposed development has been designed with due consideration of Policy Objective EI12 where relevant. The 'Operational Waste Management Plan' concludes the following:

*"By implementing design and actions outlined in this OWMP, a high level of recycling, reuse and recovery will be achieved at the development in line with European targets. Dry Mixed Recyclables (DMR) and Organic (food) Waste will be segregated at source to reduce the quantity of residual waste materials requiring off-site recovery or disposal.*

*The source segregation of waste types as detailed in this report will help to achieve the targets set out in the National Waste Management Plan for a Circular Economy 2024-2030.*

*The design of the Waste Storage Areas will meet the requirements as detailed in the "Sustainable Urban Housing: Design Standards for New Apartments", July 2023."*

#### **Policy Objective EI14: Air and Noise Pollution**

*It is a Policy Objective:*

- To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES)
- To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'.

The 'Acoustic Design Statement' prepared by RSK has given due consideration to the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023' and the 'Draft Dublin Agglomeration Environmental Noise Action Plan 2024-2028' and other documents as detailed in the report. In addition, the planning application has given due consideration to best practice guidance in relation to air quality and noise pollution, as detailed throughout in the EIAR.



### **Policy Objective EI15: Light Pollution**

*It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.*

The lighting configuration has been carefully selected to achieve recommended illuminance levels whilst minimising light spill and avoiding over lighting. This is achieved by a combination of optimised column height, luminaire Wattage, optical setting and column location for each road configuration. All luminaires proposed have high performance street lighting specific optics designed to get the light onto the target area thus minimising spill light. All luminaires proposed have a 0 degree tilt. The Upward Light Ratio of all proposed column mounted luminaires is 0%. All luminaires are to be warm white 2700K colour temperature and bollards warm white 1750K colour temperature with peak wavelength of above 550nm. All column mounted luminaires are to be fitted with photocells which automatically switch luminaires on during night time and off during daytime. Additionally, all column mounted luminaires and bollards are to automatically dim by 75% 00:00 – 06:00 (U14 profile). If required and with agreement of the local authority additional dimming is available.

### **Policy Objective EI19: Overhead Cables**

*It is a Policy Objective to seek the undergrounding of all electricity, telephone and television cables wherever possible, in the interests of visual amenity and public health.*

It is the design intent to install all electricity, telephone and television cabling below ground via a ducting system for this development. When liaising with the ESB it was deemed unviable to divert the existing 110kV overhead line below ground due to cost and timelines.

### **Policy Objective EI20: Telecommunications Infrastructure**

*It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity, fibre optic connectivity and other technologies, within the County.*

The 'Telecommunications Report' prepared by Independent Site Management Limited states the following:

*"To provide an adequate allowance to support the density and scale of the Development with the appropriate level of telecommunication channels (mobile phone signal /voice & data services), the Applicant is seeking planning permission to install the following:*

- 9No. support poles, affixed to ballast mounts on the neighbourhood centre rising 2.8 metres above parapet level. These support poles are sufficient to each accommodate 1No. 2m 2G/3G/4G antenna & 1No. 5G antenna each.*
- 3No. support poles, affixed to the rear of the ballast mounts, rising 1.5 metres above roof level. These support poles are sufficient to accommodate 2No. Ø0.3m Microwave links each.*
- Together with all associated telecommunications equipment and cabinets,*
- To adequately screen the infrastructure, the support poles used for the antennae will be*

*installed within Radio friendly GRP shrouds."*

### **Policy Objective EI22: Flood Risk Management**

*It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (2001/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on 'The Planning System and Flood Risk Management' (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives, and all measures to mitigate identified flood risk, including those recommended under part 3 (flood risk considerations) of the Justification Tests, in the Strategic Flood Risk Assessment set out in Appendix 15 of this Plan.*

*A 'Site Specific Flood Risk Assessment' (SSFRA) is submitted with the application in accordance with the Planning System and Flood Risk Management Guidelines. The SSFRA states:*

*"As is required under the Dun Laoghaire Rathdown County Development Plan 2022 – 2028 Appendix 15 – Strategic Flood Risk assessment and in accordance with the requirements set out in the DoEHLG and OPW published guidelines The Planning System and Flood Risk Management 2009 (the Guidelines), a Site Specific Flood Risk Assessment (SSFRA) has been carried out for this application.*

*In accordance with the above noted Guidelines, as sequential staged approach was adopted in assessing the flood risk for the subject development.*

*It was determined in accordance with the Guidelines that the lands on which the subject development is located is within a flood Zone C as defined in the Guidelines.*

*It is concluded that a mixed residential and commercial development is appropriate on the subject lands.*

*It is concluded that the above level of assessment is sufficient given the nature of the development and the level of flood risk identified for the site.*

*Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding."*

## 7.2 *Kiltarnan-Glenamuck Local Area Plan 2013-2018 (Extended to September 2023-now expired)*

### 7.2.1 Introduction

The subject lands were located within the *Kiltarnan-Glenamuck Local Area Plan 2013-2019* [extended to September 2023] ("*Kiltarnan LAP*"). It is reiterated that the *Kiltarnan LAP* has now expired.

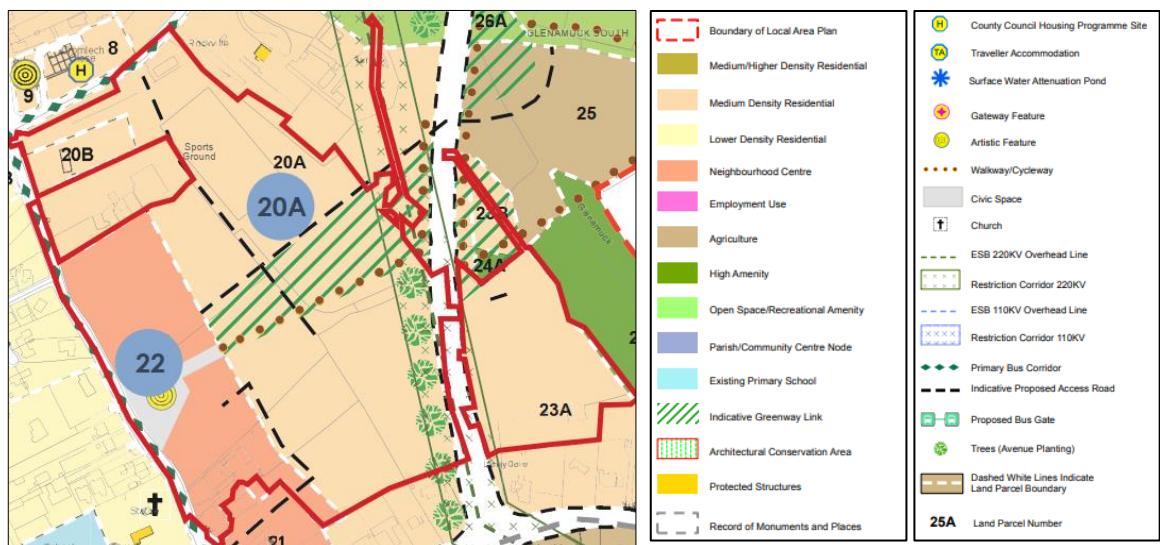


Figure 7.6: Adopted Map from Expired *Kiltarnan LAP* with Subject Site Indicatively Outlined in Red

(Source: Expired *Kiltarnan LAP*, annotated by MCORM Architects, 2024)

The expired *Kiltarnan LAP* describes in detail the contextual setting of Kiltarnan, in particular its position at the foothills of the Dublin Mountains and the significance of the Enniskerry Road as a strategic route leading southwards from the city.

It notes:

*"That while development has to some extent clustered around the Glenamuck / Enniskerry Roads and Enniskerry / Ballycorus / Ballybetagh Road junctions, the overall development pattern is very linear and fragmented and as such, the LAP area lacks a strong physical identity or indeed, focal point."*

The Historic Landscape Character Assessment carried out by DIT (2004) also describes this settlement pattern identifying clusters of development 'nodes' at certain points along the road. The nodes that it identifies, which are of significance to the DLR *Neighbourhood Framework Plan* (Appendix to the expired *Kiltarnan LAP*), include the Church of Ireland Node and the Golden Ball Node. The subject site for the proposed mixed-use development (including a new Neighbourhood Centre) is located in between both significant nodes and will become the focal point for the Village referenced as currently missing in the expired *Kiltarnan LAP*.

### 7.2.2 Phasing of Development

Chapter 10 of the expired *Kilternan LAP* set out a phasing strategy for the delivery of housing in Kilternan, which represented an interim proposal to accommodate development in advance of the delivery of the Glenamuck District Roads Scheme (GDRS), which includes the Glenamuck District Distributor Road (GDDR) and Glenamuck Link Distributor Road (GLDR). These road works have now commenced construction and thus the interim phasing of the expired *Kilternan LAP* is no longer applicable.

### 7.2.3 Site's Location with Parcel 20A, 22 and 23A of the Expired *Kilternan LAP*

The site was located within Land Parcels 20A (Medium Density Residential), 22 (Neighbourhood Centre) and 23A (Medium Density Residential) of the *Kilternan LAP* and we have demonstrated substantial compliance with requirements of these land parcels below (albeit the *Kilternan LAP* no longer has a statutory basis):



Item	Parcel 20A	Response	Parcel 22	Response	Parcel 23A	Response
<b>Zoning</b>	Objective A	As noted above, the development is in accordance with the zoning objectives for the lands.	Objective NC	As noted above, the development is in accordance with the zoning objectives for the lands.	Objective A	As noted above, the development is in accordance with the zoning objectives for the lands.
<b>Type of Development</b>	<p>Medium density residential – apartments, duplex, terrace/courtyard.</p> <p>20b - Currently houses Kilternan Country Market. In the longer-term, though medium density residential development (apartments, duplex, terrace) would be appropriate. Country Market use could re-locate to a facility within the NC. (The community use and the tradition of a market in this local area is important, not necessarily the building per se.)</p>	<p>The scheme provides a medium density development on the lands including duplexes, apartments and houses.</p> <p>It is considered that the proposed layout comprises an appropriate layout and will provide a permeable and legible development. We reiterate that all uses are in accordance with the zoning objectives.</p> <p>The Former Kilternan Country Market are included in the application lands. This area of the site will contain residential units. The wider proposed development includes a community facility, a plaza area and a Village Green, which can encourage local gatherings and local markets etc.</p>	<p>Residential, commercial, retail and community services.</p> <ul style="list-style-type: none"> <li>• This to be the 'heart' of Kilternan, i.e. this will be the primary centre.</li> <li>• Emphasis should be on providing facilities for locals, i.e. not to include businesses that 'attract' outside business, although it is acknowledged that may be used by passing through traffic on Link Distributor Road, who may deviate to make use of the facilities.</li> <li>• Design of Centre – need for an integrated development, not piecemeal. This is achievable since all in one ownership.</li> <li>• Could include residential (1/3), commercial/office (1/3) and retail. Office use to include doctors and dentists, etc. rooms</li> <li>• Could potentially include a cultural facility.</li> <li>• Should include an anchor retail facility to provide a much needed retail facility for current and future residents. This anchor store must however be appropriately integrated into the development.</li> <li>• In due course could include accommodation for Kilternan Country Market.</li> <li>• Could also accommodate community facilities – health related, post office (no PO in the area).</li> <li>• Potential for accommodating an open air/partially covered market in the central plaza area.</li> </ul>	<p>The proposed Neighbourhood Centre will be the heart and community hub of Kilternan and will serve the future residents and the community of Kilternan. The frontage provided onto Enniskerry Road, through a combination of buildings and open spaces, will enliven the streetscape and will provide a meeting point for the local community. The proposed development will encourage local gatherings through the provision of a Village Green, a plaza and a community facility.</p> <p>The development of the site will be integrated into the local community, and includes the following (in addition to some residential units):</p> <ul style="list-style-type: none"> <li>○ anchor retail store (c. 1,310 sq m);</li> <li>○ retail/commercial (c. 3,284 sq m);</li> <li>○ creche (c. 691 sq m);</li> <li>○ café (c. 326 sq m);</li> <li>○ Restaurant (182 sq m); and</li> <li>○ community facility (c. 332 sq m).</li> </ul> <p>There will also be residential units proposed in Land Parcel No. 22. The total non-residential floor area will be 6,125 sq m and includes a community facility.</p> <p>The scheme also includes an anchor convenience retail store integrated into the Neighbourhood Centre, and this, in addition to the other retail units, will serve the future residents and the community of Kilternan, which will be a great benefit for the area.</p> <p>There will be a Village Green and a plaza area provided fronting Enniskerry Road. This area could accommodate an open air/partially covered market. It is clear that the</p>	<p>Residential – medium density residential development comprising detached dwellings, courtyard and terrace housing.</p>	<p>The scheme provides a medium density development on the lands including duplexes, apartments and houses</p>

				proposed development and open spaces will be the heart of the village.		
<b>Uses to be specifically encouraged</b>	-	-	Facilities to serve the local community.	As noted above, the Neighbourhood Centre will make a positive contribution to the services available for the local community, including a specific community facility.	-	-
<b>Uses to be specifically discouraged</b>	Use of houses for doctor's rooms, office etc. i.e. 'conversion of residential use'. These type of facilities should locate within NC zoning.	There is currently no active use on the lands and thus this criteria is not applicable.	Facilities that attract non-local users	As well as serving the future residents of the scheme, the Neighbourhood Centre and amenity spaces within the scheme will provide services, facilities and amenities for the wider village.	-	-
<b>Density / Plot Ratio</b>	40-45 du/ha	The density of the development will be 41.27 No. units per hectare.	40 –45 units/ha for res. Offices: 1:0.5	The density of the development will be 41.27 No. units per hectare.  Office space can be accommodated within the commercial / retail floorspace which is subject to market demand/future tenant requirements.	40-45 du/ha	The density of the development will be 41.27 No. units per hectare.
<b>Height</b>	2-4 storeys. Four storey elements to be at locations on road frontages, adjacent to NC	The scheme principally provides heights of 2 to 4 No. storeys across the entire site.	2-4 storeys.	The scheme principally provides heights of 2 to 4 No. storeys across the entire site.	2-3 storeys (3 storeys on link distributor and Ballycorus)	The scheme principally provides heights of up to 4 No. storeys on this land parcel, which maybe be partially read as 5 No. storeys due to the position of the undercroft and taking the site levels into account. The site has taken the opportunity for increased height on this portion of land facing the GLDR. Furthermore, we note that the LAP was adopted 10 No. years ago and has now expired.
<b>Building Materials</b>	To incorporate an element of granite.	An element of granite will be incorporated into the boundary walls and screen walls within the scheme.	Incorporate element of granite	An element of granite will be incorporated into the boundary walls and screen walls within the scheme.	Granite features to be included in any proposed residential estate development.	An element of granite will be incorporated into the boundary walls and screen walls within the scheme.
<b>Architectural Style Specifications</b>	Development abutting NC to complement design.  Development to have regard for the protected structure 'Rockville' and its associated curtilage.	The scheme design has been considered coherently across the entire development lands to ensure a high-quality development is provided.  In relation to the Rockville Protected Structure, there is a 4 No. storey block already existing between the subject lands and the Protected Structure (located in the neighbouring development on the boundary with the subject lands). Sufficient separation distances are provided from the boundary with the neighbouring Rockville development. In the previous SHD scheme that was refused, two 5 No. storey apartment blocks were provided in this location which have now been replaced by two 3 No. storey duplex blocks.	Can be contemporary, but including 'vernacular' elements. No 'themed' development.  To include an appropriate water feature, sculpture or the like in the central civic space.	The development proposes a contemporary language with a rational rhythm of openings combining with vernacular elements that resonate with the special character of the Kilternan traditional built fabric. A sculpture will be provided in the central civic space (Village Green), and the design will be agreed with Dún Laoghaire-Rathdown County Council.	-	-

<b>Special Conditions</b>	-	-	Any development proposals shall be guided by the general design principles of the Kilternan Neighbourhood Framework Plan.	The development has considered the design principles of the <i>Kilternan Neighbourhood Framework Plan</i> as detailed further below this table.	-	-
<b>Other Comments</b>	<ul style="list-style-type: none"> <li>Alignment of internal loop and other roads will inform the edge treatment.</li> <li>Issue of height differential of western portion of land parcel 20a to Glenamuck Road.</li> <li>Retention in some form of the street furniture at the northern boundary of 20b including the Victorian wall mounted postbox and the built-in stile in the stone boundary wall on Glenamuck Road.</li> <li>Importance of pedestrian &amp; cycle permeability between 'G' and 'B' zonings to the east through 20a (residential) to the NC use to the west and then across Enniskerry Road to the education and other community uses to the west.</li> </ul>	<p>The topography of the site has been fully considered in the scheme design. The road layout has been appropriately considered especially with respect to the connection to the future GLDR, Enniskerry Road, Glenamuck Road and Rockville. The scheme has also comprehensively considered permeable connections through the site from Enniskerry Road to the future GLDR, including part of the Dingle Way for example. The provision of the Dingle Way is in accordance with the adopted map for the <i>Kilternan LAP</i>. Tree planting is also proposed along the site's boundary with the future GLDR in accordance with the adopted map.</p>	<ul style="list-style-type: none"> <li>Importance of permeability through plaza area from north-east to south-west.</li> <li>Needs to include recycling facilities.</li> <li>Parking facilities to be undergrounded or peripheral and/or placed to the 'rear'.</li> </ul>	<p>There are many permeable connections provided through the site from Enniskerry Road and Glenamuck Road through the site to Rockville and to the future GLDR, including the Dingle Way. Bin storage on site will include recycling facilities. Parking is well integrated within the scheme into a well landscaped streetscape, with some spaces provided in an undercroft level on the eastern site.</p>	<ul style="list-style-type: none"> <li>There may be servicing constraints associated with this land parcel since it is not within the catchment of the D&amp;W SLI Scheme. Impact on 'G' zoning to be assessed for any new development. This land parcel is the gateway to the LAP area from the east. An identifiable 'entrance feature' is required at this location.</li> <li>Access arrangements to be clarified.</li> </ul>	<p>The development of the GLDR will provide the necessary drainage and road infrastructure to serve the site.</p> <p>The proposed setbacks of the development from the site boundary to the east (adjacent to the 'G' zoning) and provision of open space along this boundary, will ensure there will be no material impacts on the proximate 'G' zoning. The ecologist has not raised any concerns with respect to these neighbouring lands. It is clear that the site provides green links through the site to the neighbouring 'G' zoning.</p> <p>An entrance point will be provided from the future GLDR as shown on the site layout and in the AtkinRéalis drawing package.</p>

Section 9.1 of the *Kilternan LAP* states that:

*"It is envisaged that this Primary Neighbourhood Centre (Land Parcel No. 22) would include a large convenience store/small supermarket anchor tenant. This store would be designed into the integrated overall design for the centre. Other units suitable as individual shops and retail service outlets, such as newsagent, pharmacy, video store, doctor's surgery or estate agency uses should be provided. Each Local Centre could also include a public house. With regard to the provision of community facilities, it is required that accommodation for community meeting facilities and accommodation for youth activities be provided at the neighbourhood centre nodes."*

The scheme includes a large anchor retail store (which has increased from c. 431 sq m in the SHD proposal to the currently proposed c. 1,310 sq m) in addition to other commercial / retail floorspace, a creche, café and community facility. These spaces will serve residents as well as the wider community. Youth activities can be facilitated at the community facility provided.

#### 7.2.4 Site's Conformity with the 13 No. Criteria Set out in the expired *Kilternan LAP*

In addition, the expired *Kilternan LAP* sets out that precedence will be given to applications for planning permission which best achieve and satisfy 13 No. criteria, which are detailed and responded to below:

Criteria	Response
1. Conformity with the Kilternan / Glenamuck Local Area Plan, 2013-2019 [now extended to 2023], and which promote and facilitate the achievement of its vision and objectives.	As detailed above, the <i>Kilternan LAP</i> has now expired. Nonetheless, the scheme predominately complies with the standards of the lapsed LAP.
2. Demonstration of a high level of architectural quality and urban design and are sympathetic to the special character of Kilternan / Glenamuck.	<p>The subject scheme represents a high-quality scheme which will contribute to the special character of Kilternan. In particular, the provision of a new Neighbourhood Centre, Village Green, cafe and plaza area along Enniskerry Road will provide a meeting point in the centre of the village for the residents and local community to interact and will complement the setting of Our Lady of the Wayside Church. The scheme will create a sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm. The Dingle Way Greenway link will also enhance permeability for the area.</p> <p>(We reiterate that Phase 1 of this LRD Planning Application has recently been granted by the Planning Authority, which includes a large portion of the non-residential uses and plaza space opposite the church for example).</p>



<p>3. Achievement of local road / footpath improvement and traffic management measures.</p>	<p>The scheme will improve pedestrian facilities along Enniskerry Road. There will be a permeable connection from Enniskerry Road through to the future GLDR via the Dingle Way. Pedestrian and vehicular connections will also be provided to the neighbouring Rockville developments and throughout the site. (Multi-modal connection to Rockville has already been granted under the Phase 1 application [DLR Reg. Ref. D23A/0616] and the neighbouring Rockville Phase 2B application [DLR Reg. Ref. D23A/0580])</p>
<p>4. Consolidation of the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines.</p>	<p>The subject site is not located within the existing development node at Glenamuck Road (northern section), including 'The Park' development at Carrickmines. However, we submit that the proposed development will contribute towards the consolidation of Kilternan Village as noted in response to No. 5 below, due to the site's location in the centre of the village and the provision of a new Neighbourhood Centre for the area.</p>
<p>5. Consolidation of Kilternan Village.</p>	<p>As the subject site is located in the centre of Kilternan Village and will provide the new Neighbourhood Centre for the village, the proposed development represents the sustainable and sequential consolidation of the village, in accordance with the proper planning and sustainable development of the area.</p> <p>The scheme can be appropriately assimilated into the village having regard to the heights and scale proposed and the opening of the site onto Enniskerry Road which includes a Neighbourhood Centre and public open space for the village, which will enliven the streetscape and will improve legibility and permeability and will provide a focus and meeting point for the entire village.</p>
<p>6. Planned within the context of an overall outline Master Plan for individual and affiliated land holdings (in order to prevent piecemeal development).</p>	<p>The enclosed Site Layout Plan prepared by McCrossan O'Rourke Manning Architects, demonstrates how the proposed development will sit in the context of the surrounding environment and how the development will connect to the</p>

	<p>surrounding lands. In particular, we note the vehicular, pedestrian and cyclist connections into the neighbouring Rockville development to the north-east and the future GLDR to the east.</p> <p>As noted above, the development, which is located in the centre of the village, represents the consolidation of Kilternan Village and will fill in a gap between the Rockville development and Enniskerry Road.</p> <p>Therefore, it is clear that the subject development represents a logical, sequential and sustainable insertion to the village and avoids piecemeal development and it could be argued that this site should be developed before any others in the Village given its importance.</p>
7. Compatibility with later phases of development.	<p>The subject development will not prejudice the development of future schemes in Kilternan. Please see enclosed <i>Landscape Design Statement</i> prepared by NMP Landscape Architects, which demonstrates linkages to the surrounding area.</p> <p>The subject scheme will sit comfortably in its context and will not impact on the deliverability of surrounding developments. The Neighbourhood Centre will also contribute towards allowing further phases of development to progress, as more services will be provided in the village.</p>
8. Facilitation of the orderly development of adjoining property/land holdings.	<p>As noted under Nos. 6 and 7, the proposed development represents the sustainable development of lands in the centre of Kilternan Village which will appropriately consolidate the village and avoids urban sprawl. The proposed development will contribute towards delivering compact growth, especially as some of the recently granted developments in Kilternan are located further from the village core. Various linkages are provided from the site to the surrounding areas. Therefore, the subject development facilitates orderly development of adjoining landholdings.</p>

<p>9. Proximity to the Luas Line B1 and within the catchment area for the Section 49 Supplementary Development Contribution Scheme for Luas Line B1.</p>	<p>The subject site is outside of the catchment area of the Section 49 Supplementary Development Contribution Scheme for Luas Line B1. However, the subject site is located within Kilternan Village and will provide a new Neighbourhood Centre and Village Green for the entire area, representing the consolidation of sustainable infill lands.</p>
<p>10. Availability of environmental services. Specifically, the Council will monitor and have regard to capacity at the Shanganagh Wastewater Treatment Works to ensure that wastewater from any proposed development in the LAP area can be accommodated in accordance with the Wastewater Discharge License for the Works.</p>	<p>A Confirmation of Feasibility and Statement of Design Acceptance has been received from Uisce Eireann and no issues were raised.</p>
<p>11. Incorporation of acceptable Sustainable Drainage System (SUDS) measures on each development site.</p>	<p>The following SUDS measures have been incorporated into the development as set out in the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> by Roger Mullarkey &amp; Associates:</p> <ul style="list-style-type: none"> <li>• Green roofs</li> <li>• Permeable paving</li> <li>• Filter drains,</li> <li>• Rainwater butts</li> <li>• Swales</li> <li>• Tree pits</li> <li>• Bio-retention areas and rain gardens areas</li> <li>• Silt-trap/ catchpit manholes</li> <li>• Hydrobrakes</li> <li>• Petrol interceptor</li> <li>• Stone lined voided arch retention storage devices.</li> </ul>
<p>12. Likelihood of early construction.</p>	<p>The Applicant, Liscove Limited, is committed to developing the subject scheme as soon as possible after receipt of planning permission in relation to the proposed development. The Applicant and their associated family operations have a positive track record of developing sites shortly after receiving planning permission such as the nearby attractive Bishop's Gate development.</p>

	This commitment to developing the lands is emphasised by the fact that permission has been recently granted for Phase 1 of the LRD lands so that development can proceed on a portion of the lands as soon as possible. The the Applicant intends to commence construction imminently on the Phase 1 lands.
13. Provision of an appropriate level of active and passive open space and community facilities. Specifically, the Council, in conjunction with the Department of Education and Skills, will have regard to the capacity of local schools to accommodate development, in accordance with the "Code of Practice on the Provision of Schools and the Planning System".	The subject scheme provides c. 23,636 sq m of public open space and c. 4,364 sq m of communal open space, which will greatly enhance the open space provision for the area including the provision of a new Village Green and a public connection through the site (the Dingle Way) from the Enniskerry Road to the GLDR. In addition, a new multi-modal link into Rockville will also be provided. The provision of a Neighbourhood Centre will also greatly enhance the community facilities for Kilternan. A study on capacity of schools has been carried out as part of the planning application.

To conclude this section, it is clear that permission can be granted for the subject development, especially having regard to recent precedents in Kilternan and the fact that the GDRS scheme will be commencing construction shortly. It is considered that the addition of 487 No. units and Neighbourhood Centre will not give rise to any planning difficulties. Rather, it will create the heart of Kilternan Village, providing a heretofore unprovided focal point for the wider Kilternan village.

#### 7.2.5 Building Height

The expired *Kilternan LAP* outlines the building heights for the subject site as 2 – 3 No. storeys for the western lands and 2 – 4 No. storeys for the eastern lands in Chapter 4. In the expired *Kilternan LAP*, Dwg No. PL-13-417 on page 35 (Chapter 4) demonstrates that heights of 2-3-4 No. storeys shall be provided at the subject lands:



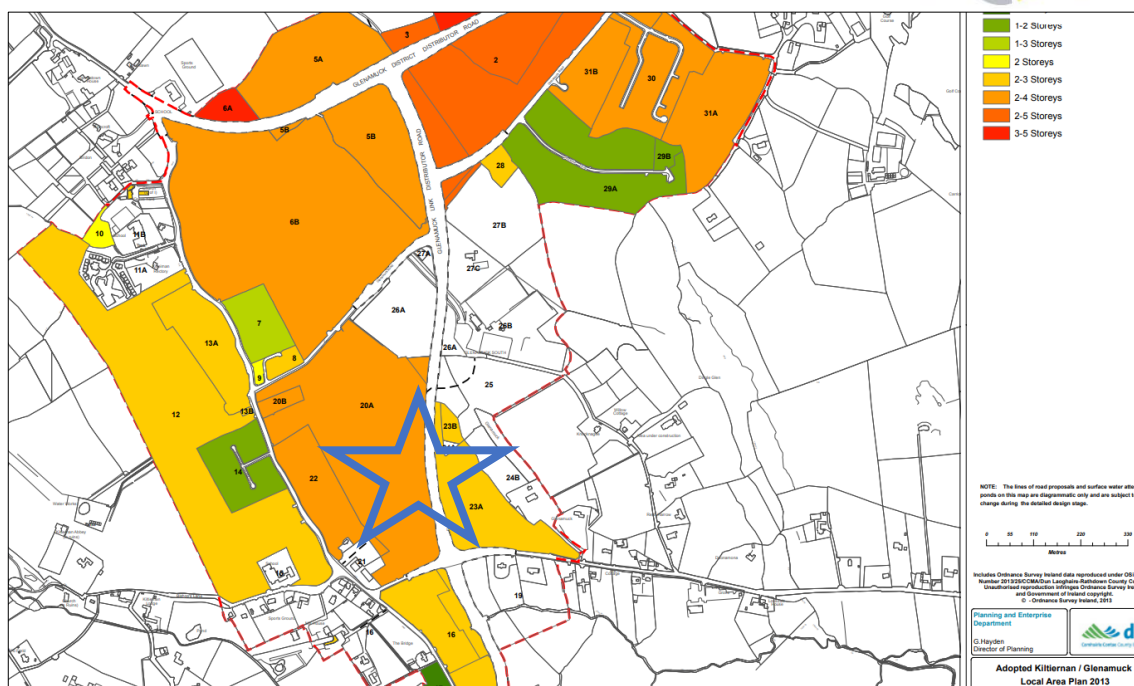


Figure 7.7: Building Height Map [Subject Site Indicatively Denoted by Blue Star]

(Source: *Kiltiernan LAP*, annotated by Thornton O'Connor Town Planning, 2024)

The proposed development principally does not exceed 4 No. storeys and is generally up to 3 No. storeys, except for the Neighbourhood Centre block which provides a pop-up 4 No. storey element. In addition, the proposed development on the area of land to the east of the future GLDR slightly exceeds the 2-3 No. storeys outlined on the map above, however the scheme has taken the opportunity to provide slightly increased heights due to the site's large frontage onto the GLDR (principally 4 No. storeys which may read as partially 5 No. storeys due to the level difference and provision of an undercroft/podium level).

It is our professional planning opinion that the site is capable of achieving increased height and density having regard to National Policy, which encourages increased height and density on appropriate sites. The scheme will also enliven the Village Centre and will provide a community hub within the core of the village fronting onto Enniskerry Road (on the 'western' site). In addition, large open spaces are provided throughout the eastern site.

## 7.2.6 Response to Relevant Primary Objectives set out in the Expired *Kiltiernan LAP*

The following Primary Objectives are set out in the lapsed *Kiltiernan LAP*. A response has been provided to each Primary Objective.

Primary Objective		Response
<b>Section 2.1 Background to Primary Objectives</b>		
Vo1	To accommodate a sustainable level of residential and other ancillary development to ensure the wider strategic objectives of the 2010-2016 County Development Plan are realised.	As set out throughout this report, the proposed development represents the sustainable development of this underutilised site in the centre of Kiltiernan Village. We note that some of the recently granted developments in Kiltiernan are located further from the village core and thus

		the development of the subject lands will ensure the delivery of compact growth.
Vo2	To establish an obvious identity/sense of place for Kiltiernan.	The scheme will establish an obvious identity/sense of place for Kiltiernan. In particular, the provision of a new Neighbourhood Centre, Village Green, café and plaza along Enniskerry Road will provide a meeting point in the centre of the village for the residents and local community to interact. The scheme will create a sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm.
Vo3	To establish a focal point/civic node for Kiltiernan.	As noted above in response to Objective Vo2, the scheme will create a new focal point/civic node for the village.
Vo4	To guide sustainable development in order to establish the character of the two component areas that comprise the LAP namely, Glenamuck and Kiltiernan.	The proposed development will establish the character of Kiltiernan and will provide new services for the local community to utilise, in addition to 487 No. residential units.
Vo5	Ensure that all projects in the LAP which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley Limited and is enclosed with this planning application.
Vo6	The overarching policies and objectives of the Dún Laoghaire Rathdown County Development Plan will equally apply to any development and any associated works, individually or in combination with other plans or projects within the LAP boundary.	As set out in this report, the proposed development is consistent with the relevant objectives of the <i>Development Plan</i> and the expired <i>Local Area Plan</i> .
Vo7	The EU Directives for Environmental Impact Assessment (EIA), the Water Framework Directive, the Floods Directive and the Strategic Environmental Assessment (SEA) are the fundamental policy framework of environmental protection measures and legislation for the delivery of the policies within this document and full compliance with the EIA and SEA Directives shall be provided.	The Water Framework Directive is addressed, and any potential impacts noted in Chapter 7 of the EIAR and the 'Hydrological and Hydrogeological Risk Assessment Report'.

Section 2.2 Broad Framework and Principles of Development		
Residential		
REO1	To develop a Plan that facilitates the development of a proper community through the considered use of imaginative and sympathetic design and layout of new residential development.	The subject scheme represents a high-quality scheme which will contribute to the special character of Kiltiernan. The design and layout of the scheme is imaginative and sympathetic and includes varying types of residential units, non-residential uses in a new Neighbourhood Centre and permeable links through and around the site in addition to large open spaces.
REO2	To encourage/ensure the successful integration of future residential developments with the existing built fabric of Kiltiernan/Glenamuck.	As detailed throughout this Report, the scheme will integrate into the surrounding environment, including with other existing and future residential developments in the area.
REO3	To facilitate the provision of appropriate residential densities and a mixture of dwelling units, types and tenures taking into account proximity to public transport corridors, site topography, sites of archaeological interest/protected structures and natural features.	As set out throughout this report, the proposed net density of c. 41 units per hectare (uph) will appropriately densify these sustainable and underutilised lands. The scheme includes 53 No. 1 bedroom units, 150 No. 2 bedroom units, 236 No. 3 bedroom units and 48 No. 4 bedroom units provided in 196 No. houses, 201 No. duplexes and 90 apartments. It is considered that the mix of units and density provided is appropriate and will provide a choice in tenure in the village.
REO4	To integrate an appropriate quantum of social and affordable housing into the LAP.	Some 50 No. Part V units are provided which is in accordance with the site's requirements.
REO5	To facilitate a travellers' accommodation site at a location adjacent to Glenamuck Road.	Not provided or designated for the subject lands.
REO6	To include sustainable strategies in building design that incorporates control of energy consumption, reduction of emissions and the use of renewable and recyclable materials.	An 'Energy Statement' prepared by Waterman Moylan Engineering Consultants is enclosed with this planning application.
REO7	To facilitate the timely provision of appropriate parallel amenity and support facilities for new residential development within the LAP.	The non-residential uses will be provided in Phase 1 and 2, which will ensure the timely provision of services for the new residential units being built over 5 No. phases.
REO8	To ensure a critical population threshold in order to support a viable and vibrant neighbourhood centre.	The construction of 204 No. units in tandem with the non-residential uses in Phases 1 and 2 will ensure a critical population is provided

		on site to support a viable and vibrant neighbourhood Centre.
REO9	To ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	<p>An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application.</p> <p>A 'Hydrological and Hydrogeological Risk Assessment Report' prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
<b>Economic Activity</b>		
EO1	To provide existing and future residents with local employment choices in the interests of sustainable communities.	The new Neighbourhood Centre will provide local employment choices.
EO2	To develop specific design responses in respect of scale, form and layout where employment zoned lands are proximate to residential areas.	N/A
EO3	To ensure that any industry development will be subject to Appropriate Assessment (AA) Screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	N/A
EO4	To require that all relevant development proposals are subject to AA screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	<p>An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application.</p> <p>A 'Hydrological and Hydrogeological Risk Assessment Report' prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
<b>Section 3.1.1 Hydrogeology</b>		
LHC1	To ensure that planning applications to take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.	Assessed and any impacts noted in the EIAR.

LHC2	To ensure the implementation of the EU Water Framework Directive, the EU Groundwater Directive and the protection of the groundwater resources in and around the LAP and associated habitats and species.	This has been considered as part of the 'Appropriate Assessment Screening Report' prepared by Scott Cawley.
<b>Section 3.1.5 Water Catchment Areas &amp; Surface Drainage</b>		
LHC3	To ensure the implementation of the EU Floods Directive and its transposition into Irish legislation in order to prevent, reduce and control flood risk in river basin and coastal areas due to increased domestic and economic development in flood risk zones and climate change effects.	The 'Site Specific Flood Risk Assessment' assessed and addressed risks associated with coastal flooding.
LHC4	To implement the recommendations of the relevant Catchment Flood Risk Assessment and Management (CFRAM) study, when published, and the mitigation measures and recommendations arising from the associated SEA and AA shall also be addressed and implemented.	The 'Site Specific Flood Risk Assessment' assessed the CFRAM and determined the site was a Flood Zone C, where the probability of flooding from rivers and sea is low (less than 0.1% or 1 in 1000 years for both river and coastal flooding).
LHC5	To implement the Planning System and Flood Risk Management for Planning Authorities (DoEHLG/OPW 2009) and the National Flood Hazard Mapping (OPW 2012) while referring to the relevant Flood Risk Management Plan (FRMP) for the LAP.	The 'Site Specific Flood Risk Assessment' assessed in accordance with the Guidelines
LHC6	To require that all proposed flood protection or alleviation works will be subject to Appropriate Assessment (AA) to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	N/A
LHC7	To ensure riparian buffer zones are created between all watercourses and any development, a minimum of 15m to mitigate against flood risk. The extent of these buffer zones shall be determined in consultation with a qualified ecologist and following a Flood Risk Assessment.	N/A



	Any hard landscaping proposals shall be located outside of these buffer zones	
LHC8	Ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream or watercourse in the LAP area and be compliant with the 'Requirements for Protection of Fisheries Habitat during Construction and Development Works at River Sites'.	N/A
LHC9	In the event of lighting being proposed along river or canal corridors an Ecological Impact Assessment (and where necessary an Appropriate Assessment) including bat and otter surveys shall be conducted by specialists. The recommendations of the specialist studies shall be implemented. No lighting will be installed without prior consultation with the National Parks and Wildlife Service (NPWS) and shall be in line with advances in knowledge into the impact of lighting on bats and other species and also to reflect advances in technology in the lighting industry.	N/A
<b>Section 3.2.2 Biodiversity</b>		
LHC10	Conserve, enhance and manage the natural heritage within the LAP area including its biodiversity, landscapes and geological heritage and promote understanding of and sustainable access to it.	<p>The scheme has duly considered the natural heritage of the LAP area. For example, tree retention and supplementation are key elements of the layout. A 'Landscape and Visual Impact Assessment' has been carried out as part of the EIAR and the EIAR also includes a Land and Soil Chapter.</p> <p>The scheme promotes access to the large green spaces provided within the development which will ensure sustainable access to natural heritage is promoted.</p>
LHC11	Ensure that all plans and projects in the LAP area which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application. This Report concludes that <i>""Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any</i>

		<p><i>significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.3 above. In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.</i></p> <p><i>Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)."</i></p> <p>A 'Hydrological and Hydrogeological Risk Assessment Report' prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
LHC12	To ensure that a Natura Impact Statement (NIS) is produced if Appropriate Assessment (AA) screening has indicated likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites.	<p>An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application, which determines that no Natura Impact Statement is required.</p> <p>A 'Hydrological and Hydrogeological Risk Assessment Report' prepared by Enviroguide Consulting is also enclosed with this planning application.</p>
LHC13	To consult with the National Parks and Wildlife Service (NPWS) when undertaking, approving and authorising development which is likely to affect plant, animal or bird species protected by law. In the event of a proposed development impacting on a site known or likely to be a breeding or resting site of species listed in Habitats Regulations a derogation licence, issued by the Department of Environment, Community and Local Government (DECLG) will be required in advance of a permission.	Derogation licence has been applied for in the context of the proposed demolition of derelict dwelling and outbuildings.
LHC14	To ensure the implementation of the EU Freshwater Fish Directive and its transposition into Irish legislation in	N/A given lack of water source within proposed development boundary.

	order to protect any fish and shellfish habitat in the LAP area.	
LHC15	To ensure the monitoring and control of EIA sub-threshold development within the LAP through the document Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding subthreshold development (DEHLG, 2003) with specific reference to the requirement of Appropriate Assessment (AA) screening.	<p>An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application.</p> <p>An 'Environmental Impact Assessment Report' (EIAR) collated by Enviroguide Consulting is also enclosed with this planning application.</p>
LHC16	To promote the protection of habitats which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their contribution as stepping stones (e.g. ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.	The retention of linear habitats including treelines and woodland within the proposed development site has been encouraged and described within the Biodiversity Chapter of the EIAR.
LHC17	To support the National Parks and Wildlife Service (NPWS) and Department of Environment, Community and Local Government (DECLG), in the maintenance and, as appropriate, the achievement of favourable conservation status for the habitats and species to which the EU Habitats Directive applies.	The Biodiversity EIAR Chapter and 'Appropriate Assessment Screening Report' have discussed any potential impacts associated with the proposed development and included mitigation measures where relevant. Additionally, enhancement measures are included within the design.
LHC18	Any significant tree stands should be assessed for retention (where possible) as part of any planning application for development, most notably the stand of pure blackthorn on the 'Objective G' zoned site.	<p>The Arboricultural Assessment prepared by Arborist Associates Limited notes the following:</p> <p><i>"...great efforts have been made to retain as many of the better quality trees and in particular the trees within tree belts or groups which are of most visual value to the treescape of this area with the main tree belts running through the centre of the site being incorporated into its main open space areas."</i></p>
LHC19	To carry out a detailed ranking survey of the hedgerows be undertaken as part of any future development proposals, and where possible to incorporate these hedgerows within the development. It is acknowledged, however, that it will not	The 'Arboricultural Assessment' categorises all survey hedgerows within the development site (and any relevant hedgerows adjacent to the application site boundary). The hedgerows have been incorporated within the development as much as feasibly possible.

	be possible to retain all of the current hedgerows.	
LHC20	To recognise and contribute towards protection of habitats from alien / invasive species (e.g. Japanese knotweed, giant hogweed, Himalayan balsam, etc.) in accordance with Action Number 4.7 of the Dun Laoghaire-Rathdown Biodiversity Plan 2009-2013.	N/A - No 3 <sup>rd</sup> schedule invasive species recorded within the proposed development site.
<b>3.2.6 Protected Views and Prospects</b>		
LH21	To ensure the preservation of the prospect of Three Rock, Two Rock Mountain and Carrickgollogan from Enniskerry Road and the designated protected views southwards from Ballycorus Road.	The protected views Three Rock Mountain and Two Rock Mountain from the Enniskerry Road (Sandyford-Kiltiernan area) are not affected by the proposed development. The view from Three Rock Mountain was assessed (Viewpoint 19) but it was concluded that the impact is minor and neutral. The proposed development fits within the Kiltiernan settlement, not breaking the existing unity.
<b>3.3.1 Protected Structures</b>		
LHC22	To comply with all of the policies for the protection of the Architectural Heritage in the current Dún Laoghaire-Rathdown County Development Plan, including those set out in the Development Management Section. In particular to provide appropriate protection for the Protected Structures and Recorded Monuments in the area.	<p>There are no protected structures within the site. However, due to the distance to the proposed development site, the following protected structures were considered:</p> <ul style="list-style-type: none"> <li>• Entrance Gates to Kiltiernan Abbey (at Golden Ball)</li> <li>• Rockville House</li> <li>• Rockville Gate Lodge</li> <li>• Our Lady of the Wayside Church</li> <li>• Mill House</li> </ul> <p>The proposed development complies with the policies for the protection of the Architectural Heritage of the listed protected structures as the development respects the proximate structures, especially given the setbacks provided from the structures and proposed vegetation.</p>
<b>3.3.2 Conservation Area/ACAs</b>		
LHC23	Any development proposals pertaining to Moss Cottages must respect and take cognisance of the ACA designation for the area, the details of which are described in the "Moss Cottages – Character Appraisal and	N/A

	Recommendations", available on the Council's website.	
<b>4.7 Urban Design Issues</b>		
BFo1	To promote a vision for a desired character for Kiltiernan, and to establish guidelines to encourage development that will impart the desired character, particularly to the core area, thus creating a sense of place.	The proposed development includes various character areas as set out in the 'Architectural and Urban Design Statement'.
BFo2	To formulate clear guidelines relating to architectural and urban design, building form, 3-dimensional character, materials and landscape elements.	N/A
BFo3	To acknowledge surviving features that impart a particular character to the Plan area, and to establish how new development can be fused with these intrinsic features.	N/A
BFo4	To encourage the incorporation of granite and granite features into the design of residential and commercial buildings - continuing the tradition of utilising local materials and maximising the visual and economic linkages with the local landscape.	Granite has been incorporated into the boundary walls.
BFo5	To provide a 'Design Statement' and layout for new residential development, in accordance with the 'Urban Design Manual - A Best Practice Guide' (2009) which allows for an attractive living environment while taking advantage of existing natural features, views, sites of archaeological interest, and any other significant features.	An 'Architectural and Urban Design Statement' prepared by MCORM Architects accompanies this planning application which has been prepared with reference to the <i>Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024</i> which have replaced the <i>Urban Design Manual - A Best Practice Guide (DoEHLG, 2009)</i> .
BFo6	To encourage usage of local placenames wherever possible in new developments.	The naming scheme of the proposed development will include local placenames.
<b>4.8 Housing Design Issues (Part 1)</b>		
a.	A variety of house types – apartments, terraces, semi-detached, detached – should all be considered as possible elements in any development mix.	The scheme includes 487 No. residential units comprising 53 No. 1 bedroom units, 150 No. 2 bedroom units, 236 No. 3 bedroom units and 48 No. 4 bedroom units provided in



		196 No. houses, 201 No. duplexes and 90 apartments It is considered that the mix of units and density provided is appropriate and will provide a choice in tenure in the village.
b.	A variety of design is essential in order to create a sense of place. More variants of standard house types assists in achieving good urban design which needs house types that wrap corners, define or enclose spaces, link buildings, etc.	The provision of 196 No. houses, 201 No. duplexes and 90 apartments provides a 'natural variety of design'.
c.	<p>Having regard to the urban/rural edge location of the plan, generally it is considered that a higher rise built form may be acceptable in certain locations but that it should generally not rise above five storeys.</p> <p>Within the Medium-Higher Density Res. zone, while 3-4 storeys would generally be encouraged, up to five storeys will be acceptable but these elements should be focussed primarily on the proposed distributor road, and as corner elements at road junctions.</p> <p>Within the Medium Density Res. zone 2-3 storeys would be encouraged with four storey elements to be concentrated along the proposed main and link distributor roads, and/or at key entrances to sites.</p>	The scheme predominately provides heights of 2-3 No. storeys with a 4 No. pop-up No. storey element. In addition, the proposed development on the area of land to the east of the future GLDR has taken the opportunity to provide slightly increased heights due to the site's large frontage onto the GLDR (principally 4 No. storeys which may read as partially 5 No. storeys due to the level difference and provision of an undercroft/podium level). This is in accordance with Section 4.8 (c) which notes that up to 5 No. storeys should be focused primarily on the proposed distributor road.
<b>4.8 Housing Design Issues (Part 2)</b>		
a.	Buildings to incorporate an element of granite – this will be a signature material which application will serve to provide a common feature of the various proposed developments.	Granite has been incorporated into the boundary walls.
b.	Designs should if possible avoid obviously faddy themes and the incorporation of an overly excessive assortment of features/detailing. Cleaner/simpler design form results in more sustainable styles.	The scheme incorporates character areas to distinguish the various sections of the site. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality and the scheme design is simple.
c.	The layouts of individual sites should exhibit a clear spatial structure with variety, contrast and identity.	This has been provided in the subject development i.e. variety of units types and non-residential uses which allows a natural

		contrast between buildings. In addition, the site will provide a sense of identity for the village with the provision of the Neighbourhood Centre and various open spaces and permeable links.
d.	As a general principle residential layouts should be orientated such that communal open spaces are overlooked and /or significant views are exploited.	All open spaces are overlooked.
e.	As a general presumption, layout details should be sensitive to the requirements of those with disabilities or special needs.	A 'Universal Access Statement' is included with this planning application.
<b>Other:</b>		
i.	Innovative use/mix of material finishes.	<p>The scheme will be provided with high quality materials as described throughout the 'Architectural and Urban Design Statement', which notes:</p> <p><i>"The primary materials for the development will be a mix of high-quality brick textures with complementary stone details in selected areas to the street elevations. The material choice will ensure that the buildings proposed are durable as well as being of high visual quality.</i></p> <p><i>Each one of the 4 proposed character areas has legible unique features that will create a sense of identity and place, while applying a coherent architectural language through the use of repeating elements such as complementary brick types, window types, balcony treatments, stone surrounds and metal canopies.</i></p> <p><i>The use of these high quality, durable and low maintenance materials within the scheme will contribute to the longevity, appearance and character of the proposed development."</i></p>
j.	The incorporation of high quality hard and soft landscaping into proposed Development.	High quality hard and soft landscaping has been incorporated into the development. There are various public and communal open spaces provided in the development in addition to permeable links.
<b>5.1 Public Transport</b>		

MT01	<p>To reduce the need for travel by private car within the LAP by:</p> <ul style="list-style-type: none"> <li>• facilitating appropriate frequencies and routings of bus services to address increased population levels, including good linkages to Ballyogan Wood Luas stop on the Luas Green Line,</li> <li>• providing and/or facilitating the development of an interlinked cycle and pedestrian network that would connect the LAP to the wider locality,</li> <li>• maximise pedestrian catchment of bus services operating on Enniskerry and Glenamuck Roads,</li> <li>• encouraging mixed use development to optimise internal trips and make accessibility by non car modes more viable/desirable,</li> <li>• requiring Commercial/Retail uses to operate Mobility Management Plans to provide incentives to reduce dependence on travel by car.</li> <li>• To reduce the need for travel by private car within the LAP and to acknowledge the amenity and health benefits of off-road recreational cycling by providing both on-road and complementary off-road cycling facilities within the Plan area.</li> </ul>	<p>The development is located within walking distance of bus stops on Enniskerry Road and Glenamuck Road and is within c. 2.3 km – c. 2.7 km (c. 26-31 minutes walking distance) from the Ballyogan Wood Luas Stop. The bus services also provide onward connections to Luas services at Ballyogan Wood. The delivery of the GDRS with its enhanced bus priority measures (see Traffic and Transport Assessment) will provide enhanced connectivity and reliability of services.</p> <p>The masterplan layout has been informed by external developments, connections, amenities, and facilities in mind in order to meet desire lines and promote walking and cycling.</p> <p>The proposal is a mixed use development including a neighbourhood centre that will reduce the need to travel particularly by car.</p> <p>The development provides for off road walking and cycling facilities particularly through the provision of the Dingle Way.</p> <p>A 'Mobility Management Plan' is submitted in support of the planning application.</p>
<b>5.2 Walking and Cycling</b>		
MT02	<p>To promote maximum accessibility through routes of optimised connectivity and permeability for walking, cycling and public transport while establishing safe infrastructure for all vulnerable road users.</p>	<p>The development layout has been designed in accordance with DMURS principles with low traffic volumes and speeds to encourage walking and cycling. The layout is highly permeable with a coherent legible network of streets that meets desire lines and provides both internal and external connectivity.</p>
MT03	<p>It is an objective of the Plan that all new residential and commercial development schemes must include adequate provisions for safe and secure cycle parking facilities at appropriate locations in accordance with County Development Plan standards.</p>	<p>The development will provide secure, sheltered and accessible cycling facilities for all land uses in accordance with DLRCC cycle parking standards.</p>
<b>5.3 Road Network</b>		

MT04	To establish the function, shape and usage of the strategic road network generally within the LAP area.	The layout of the development and the location of its access points reflects the form and function of the road hierarchy.
MT05	To establish the future function of Glenamuck Road in terms of providing local access (including car, bus, pedestrian and cycle) to the wider strategic road network.	The development provides for connections and linkages to and from the Glenamuck Road.
MT06	To establish the appropriate functions of Enniskerry Road in terms of minimising through movements while accommodating locally generated movements (car, pedestrian and cycle) from future developments, and also potential future movements associated with the planned neighbourhood centre facility.	The scheme proposes improvements to the urban realm on Enniskerry Road that will improve the pedestrian and cyclist experience (see 'Traffic and Transport Assessment' enclosed for further details). The development provides an active frontage onto Enniskerry Road that will provide active and passive surveillance.
MT07	To introduce appropriate traffic calming measures and to divert through traffic away from the future LAP civic node in order to address issues such as safety, noise and air pollution, and the potentially negative severance of the component parts of the LAP area.	The proposed Enniskerry Road treatment includes the provision for reducing vehicle dominance and reallocation of spaces to walking and cycling and can be delivered in conjunction with the GDRS to provide traffic calming and enhanced environmental improvements.
MT08	In acknowledgement that some car usage is inevitable, to stipulate maximum car parking provision for differing development types on a demand management basis with appropriate restrictions on on-street parking in order not to undermine that objective.	The level of car parking proposed is balanced to reflect the site characteristics and ensure that sustainable and active travel is not undermined. On street car parking will be managed to ensure overspill car parking does not adversely impact on the urban realm and road safety.
MT09	To have regard to the EU Ambient Air Quality Directive, the EU Ozone Directive, the EU guidance documents Greening Transport (EU 2008) and A Sustainable Future for Transport (EU 2009) and the National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009) to develop strategies which better reflect the real costs that transport volumes and emissions impose onto society, environment and economic efficiency.	<p>The development has regard to EU Ambient Air Quality Directive, the EU Ozone Directive, the EU guidance documents Greening Transport (EU 2008) and A Sustainable Future for Transport (EU 2009) and the National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009).</p> <p>The development accords with principles of National Transport Strategy Smarter Travel: A Sustainable Transport Future (DTTS 2009) and its update the National Sustainable Mobility Plan vis-a-vis sustainable transport</p>

		<p>and measures to reduce adverse impacts on air quality through transport.</p> <p>The development facilitates the provision of electric charging facilities for cars.</p>
MT10	New developments shall provide noise mitigation measures (e.g. boundary walls and/or double/triple glazing) to reduce noise caused by new roads to within acceptable levels.	An 'Acoustic Design Statement' has been prepared by RSK Ireland Limited. The noise control recommendations require the provision of glazing with minimum sound insulation properties and the provision of acoustic attenuated ventilation with minimum sound insulation properties as outlined in the Report.
MT11	To ensure implementation of the Dublin Agglomération Environnemental Noise Action Plan.	The Acoustic Design Statement has given due consideration to the 'Dublin Agglomération Environmental Noise Action Plan 2018-2023' and other documents as detailed in the report.
<b>6.3 Surface Water Drainage</b>		
Elo1	To ensure the implementation of the EU Drinking Water Directive in order to achieve and improve appropriate water quality standards for the LAP for human consumption while conditioning development dependent on sufficient water supply.	Uisce Eireann assessed and determined the water supply to the site is " <i>feasible without infrastructure upgrade</i> ".
Elo2	To ensure the implementation of the European Communities Drinking Water (No.2) Regulations 2007, S.I. No. 278 of 2007 and the EPA 2010 guidance on the Implementation of the Regulations for Water Services Authorities for Public Water Supplies. These regulations shall be applied for increased penalties in case of non-compliance and programmes to minimise water supply leakage shall be developed.	The water supply network has been designed in accordance with the Irish Water Code of Practice for Water Infrastructure and has been assessed by Uisce Eireann and a Statement of Design Acceptance was issued by Uisce Eireann to that effect.
Elo3	To require that all development relating to water supply and waste water treatment are subject to Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	An 'Appropriate Assessment Screening Report' has been prepared by Scott Cawley and is enclosed with this planning application.



Elo5	To ensure the changeover from septic tanks to mains connections in all cases where this is feasible and that all new developments utilise and connect to the existing wastewater infrastructure. The provision of individual septic tanks and treatment plants in the LAP will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards will be required, including the EPA 2009 Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e.≤ 10).	The sites wastewater is to connect to the existing piped infrastructure and no septic tanks are proposed.
Elo6	To promote assessment of the adequacy of the existing wastewater treatment facilities in terms of both capacity and performance as well as potential risk to human health and water quality.	The waste water from the site is assessed in terms of impact on water quality in Chapter 7 of the EIAR.
Elo7	To ensure the implementation of the EU Water Framework Directive and its transpositions into Irish legislation.	The Water Framework Directive is addressed and any potential impacts noted in Chapter 7 of the EIAR and the 'Hydrological and Hydrogeological Risk Assessment Report'.
Elo8	To implement the specific relevant objectives and measures for individual water bodies set out in the Eastern River Basin Management Plan and associated Programme of Measures, where relevant. To ensure the implementation of the surface water legislation Environmental Objectives (Surface Waters) Regulations 2009 S.I. No 272 of 2009 and the EPA report Water Quality in Ireland 2007-2009 in order to achieve general improvements of any water supplies in the LAP.	A SuDS Audit was carried out as required in the Stormwater Management Policy. No issues arose in the audit that contradict the relevant objectives.
Elo9	To require that a Sustainable Drainage System (SuDS) is applied to any development and that site specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and associated River Basin Management Plans.	SuDS measures have been applied across the site as detailed in the Roger Mullarkey and Associates drawings and the 'Engineering Infrastructure Report & Stormwater Impact Assessment'. A SuDS Audit was carried out as required in the Stormwater Management Policy.

El10	It is a policy of the Council to facilitate the provision, upgrading and maintenance of adequate and appropriate waste water services and water supply to service new developments and in assessing applications will require that development proposed will only take place where appropriate sustainable waste water infrastructure is in place.	Uisce Eireann assessed and determined that the waste water services and water supply to the site is " <i>feasible without infrastructure upgrade</i> ".
<b>6.5 Waste Management / Landfills</b>		
El11	To ensure the implementation of the EU Waste Framework Directive and its affiliated directives, namely the EU IPPC Directive, the Landfill Directive and the WEEE Directive.	<p>The EU Waste Framework Directive is addressed in the 'Resource and Waste Management Plan' and 'Operational Waste Management Plan' that are prepared for this application.</p> <p>Chapter 12 of the EIAR also assesses the waste management.</p>
El12	Prevent and minimise the generation of waste in accordance with the Waste Management Plan for the Dublin Region while minimising waste to landfill and considering suitable alternatives.	Diversion of waste from landfill and waste prevention will be the overarching philosophy adopted for the scheme, as noted in the 'Operational Waste Management Plan'.
<b>6.6 Electricity</b>		
110kV Lines	<p>A minimum lateral clearance of 20 metres either side of the centreline (i.e. a 40m wide restricted corridor).</p> <p>A clearance of 23 metres must be allowed for any tower leg.</p>	The proposed development has been designed as to ensure that buildings proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.
220kV Lines	A minimum lateral clearance of 30 metres either side of the centreline (i.e. a 60m wide restricted corridor).	The proposed development has been designed as to ensure that buildings proximity has the relevant clearance either side of the centre line of a pylon in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines – May 2019'.
El13	It is an objective of the Council that high voltage transmission lines in the Plan area be undergrounded, both to improve the visual amenities of the area and to remove the constraints to development presented by the lines. To this end, the Council will work with	It is the design intent to install all electricity, telephone and television cabling below ground via a ducting system for this development. When liaising with the ESB it was deemed unviable to divert the existing 110kV overhead line below ground due to cost and timelines.

	Eirgrid, ESB Networks and other relevant stakeholders. To encourage and/or facilitate the undergrounding of the Arklow-Carrickmines double circuit 220/110kV transmission line and the Carrickmines-Fassoroe 110kV transmission lines Nos. 1 and 2. Where undergrounding is not feasible, to sensitively incorporate any restriction corridors associated with said powerlines into the design of future developments.	
<b>7.0 Open Space and Recreation Facilities</b>		
OSo1	To identify a hierarchy of open spaces and clarity in respect of their function (differentiation between public and private open space.)	This has been set out in the 'Landscape Design Statement' by NMP Landscape Architecture.
OSo2	To provide for linkage/access along open spaces and between different green spaces creating a network linking different functional areas both within and adjacent to the plan boundary.	The scheme includes a network of linkages within the site and through the site to surrounding areas.
OSo3	To acknowledge and respect areas of ecological importance, local topography, watercourses, hedgerows, woodlands, mature trees and views when providing open space and to ensure the protection of ecological linkages when providing open space within the Plan area.	The topography of the site has been fully considered in the scheme design. The road layout has been appropriately considered especially with respect to the connection to the future GLDR and Enniskerry Road and Glenamuck Road. As noted above, the retention of trees is a key element of the scheme, and the objective of the proposed development layout was such as to try and retain as much of the important tree lines, groups and belts as possible. The green infrastructure strategy follows an overarching strategy of protecting, creating, enhancing, and connecting the natural heritage and biodiversity value of the lands. A 'Landscape and Visual Impact Assessment' and Biodiversity Chapter have been prepared as part of the EIAR.
OSo4	To provide for recreational cycle paths within open space. (In some instances, cycle paths located within green areas, may need to be linked by cycle track facilities provided along main transportation corridors.)	Permeable links are provided within the site and through to surrounding developments.

OSo5	Landscape design, specification and open space construction to be of a high standard & open space to be designed to be robust, accessible, useable, connected and supervised.	The proposed open spaces will be high standard, robust, accessible, useable, connected and supervised. Please see the 'Landscape Design Statement' enclosed.
OSo6	Open space to be designed in a way that protects and enhances biodiversity.	The green infrastructure strategy follows an overarching strategy of protecting, creating, enhancing, and connecting the natural heritage and biodiversity value of the lands.
OSo7	To provide for the appropriate types of active/passive recreational facilities both indoor and outdoor in the LAP for all age groups. Facilities to be provided should be appropriate to the scale and needs of the development area whilst having regard to established or planned amenities in the wider environs. Adequate transport access to these recreational facilities via safe public transport and pedestrian/ cycleway network is paramount.	<p>The proposed play strategy for this scheme provides for structured and natural play spaces throughout the development. Exercise equipment is also provided in the scheme. The crèche also includes an outdoor play space.</p> <p>The proposed Neighbourhood Centre will serve the scheme and the surrounding community and is thus appropriate for the subject site. The site has access to public transport and will be provided with a number of pedestrian/cycle linkages.</p>
<b>8.o Social and Community Development</b>		
SCDo1	To facilitate an appropriate level of provision of community facilities commensurate with the scale of the new residential communities. (This will include identifying existing community facilities available locally and in neighbouring areas, and identifying additional requirements.)	The development includes the provision of a Neighbourhood Centre which will positively contribute to the provision of facilities in the village. The scheme includes a community facility which will encourage local gatherings.
SCDo2	To centralise the existing and proposed community facilities at appropriate locations, where feasible.	The Neighbourhood Centre and Village Green will front Enniskerry Road along with the café and plaza space, which is considered an appropriate location.
SCDo3	To assess the needs for educational facilities, in particular the possible need to provide a secondary school for the broader area given the extent of development in the wider area, including Stepside/Ballyogan.	The 'Social Infrastructure Audit' concludes that the proposed non-residential floorspace will have a positive impact on the village.
SCDo4	It is the policy of the Council to ensure the reservation of primary and post-primary school sites in accordance with the requirements of the relevant education authorities. Schools will be	The subject site is not designated for these purposes.

	delivered in the LAP area in accordance with the "Code of Practice on the Provision of Schools and the Planning System".	
<b>9.1 Retail and Neighbourhood Centres</b>		
NC01	To provide of an appropriate mix of residential/ commercial/ retail/ community services development in the new neighbourhood centres to ensure a high quality and attractive civic environment, a sense of both place and vitality, and which optimises access to public transport corridors.	The scheme providing 487 No. residential units and 6,125 sq m of non-residential floorspace will provide an appropriate mix of uses to serve the surrounding area. Since the LRD Opinion Stage, the quantum of non-residential uses has been significantly increased by 1,602 sq m. The open spaces and community facility etc. will ensure a sense of place and vitality is provided and linkages to the surrounding area will be incorporated, enhancing access to public transport.
NC02	To develop clear permeability and linkages between the neighbourhood centre/s and adjoining land uses.	The scheme includes permeable links such as through the site to the neighbouring Rockville development, via the Dingle Way and the future GLDR, and connections to Enniskerry Road and Glenamuck Road. The Neighbourhood Centre, Village Green, café and plaza will be clear meeting points for the village and the scheme and will be appropriately linked to the adjoining lands uses within the site (residential).
NC03	To ensure that new development relates to the existing/ established perceived village core, and to respect any key views, landmarks and/or other features, if applicable.	The scheme will enhance the village core and will assimilate into the surrounding environment. There are no Preserved/Protected Views Protected Areas within the study area and the Proposed Development does not affect any protected view identified in the County. Please see the 'Landscape and Visual Impact Assessment' included as part of the EIAR.
NC04	Provision should be made for civic recycling facilities at the Primary Neighbourhood Centre.	<p>The 'Operational Waste Management Plan' prepared by Enviroguide Consulting notes the following:</p> <p><i>"There is a large civic amenity centre in Carrickmines servicing the Kilternan area, with numerous bring banks throughout the region for glass bottle collection."</i></p> <p>It is clear that sufficient Bring Centres are available in the area and the 'Operational Waste Management Plan' enclosed does not</p>



		consider it necessary to provide one in the scheme. As a Bring Centre is not required for the scheme, it is considered that it is more appropriate to densify the subject underutilised lands in accordance with National Policy.
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### 7.2.7 Kilternan Neighbourhood Framework Plan

In addition, the *Kilternan Neighbourhood Framework Plan* ("Kilternan NFP"), which is an appendix to the expired *Kilternan LAP* is applicable to the subject lands.

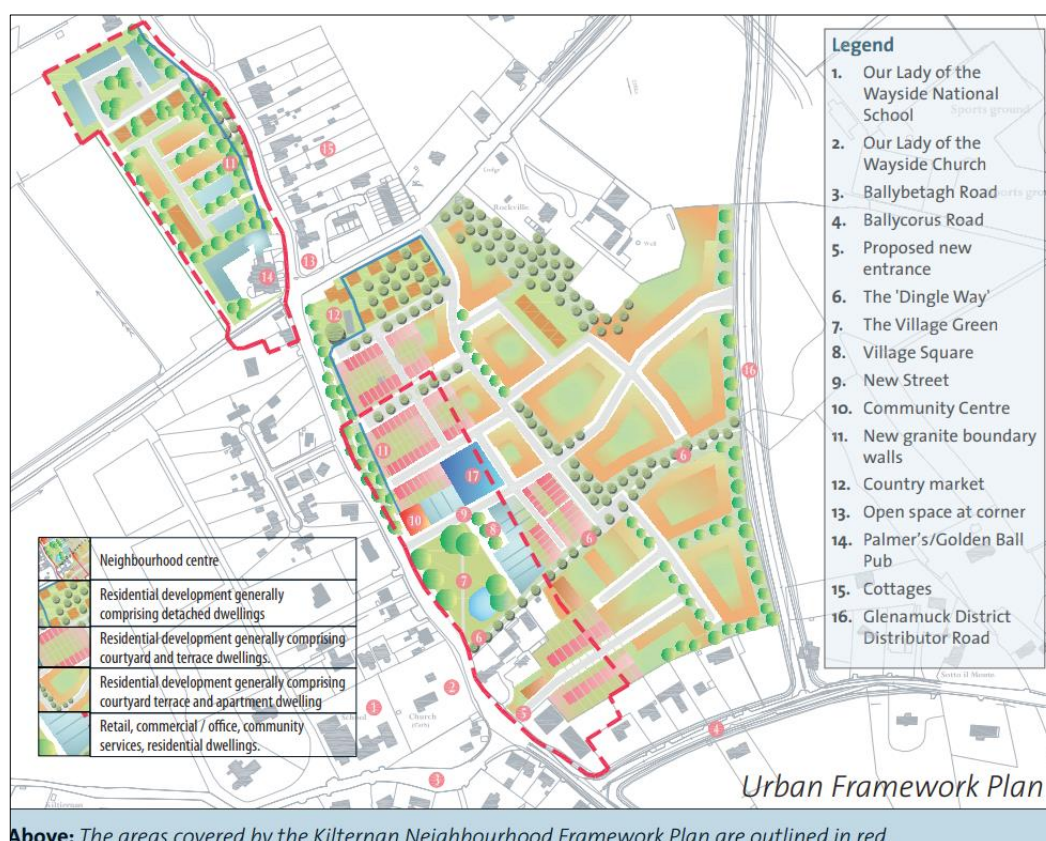


Figure 7.8: Kilternan NFP Map

(Source: Kilternan NFP – Appendix to Expired Kilternan LAP)

The main elements that apply to the subject lands are:

Map Item	Response
The Dingle Way (No.6)	Provided in the scheme layout.
The Village Green (No. 7)	Provided in the scheme layout.
Village Square (No. 8)	The Village Green will incorporate various different spaces including pathways, space for kick about and potential outdoor markets.
New Street (No. 9)	Provided in the scheme layout.
Community Centre (No. 10)	Community facility provided to serve the local community, and significant quantum of open

	space provided which will also provide a meeting hub for the community.
New granite boundary walls (No. 11)	Provided throughout the scheme layout.

Part 2 of the *Kiltarnan NFP* states:

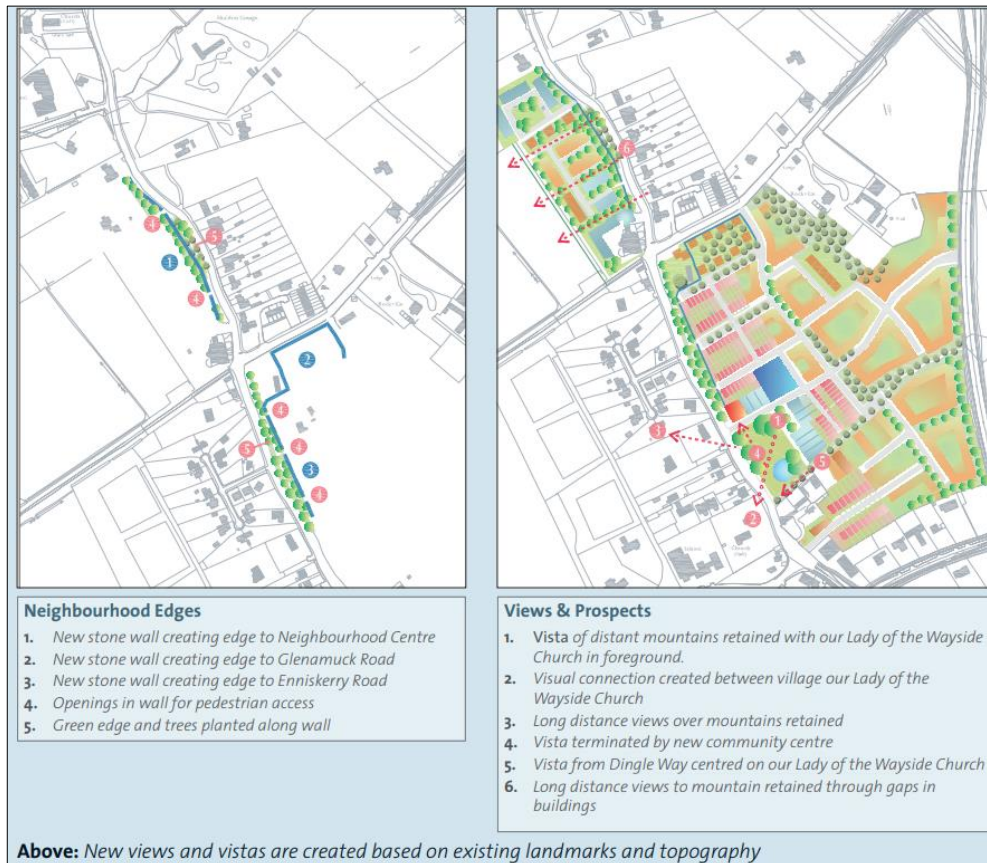
*"Therefore the framework plan aims to:*

- (i) Reinforce the node centred on Our Lady of the Wayside Church and to concentrate retail, commercial and community activities in one area centred on a new 'green' that will become the heart of the village. Maintain the scale and height of existing development along the Enniskerry Road. Direct higher and denser development away from the road edge deeper into the zoned development lands.*
- (ii) Create a self-contained development of complimentary uses on the secondary Neighbourhood Centre on Parcel Nos. 13a and 13b. This development will be designed and set behind stone walls and trees and will not present commercial or retail frontage to the Enniskerry Road in competition with the primary centre.*
- (iii) Strengthen the elements that link these nodes by retaining existing walls where possible and where appropriate, building new walls to create visual and spatial enclosure. At the same time sufficient space for abundant tree planting and generous pavements should be allowed. Co-ordinated lighting, seating and soft planting should be introduced along the Enniskerry Road."*

The proposed development will reinforce the node centred on Our Lady of the Wayside Church as the scheme will include a new café and plaza area at the subject lands opposite the Church. We reiterate the planning permission has been granted for Phase 1 of the subject LRD Planning Application which includes the Village Green, café and plaza area opposite the church. The Village Green and Neighbourhood Centre are also focused on this area. The scale and height proposed along Enniskerry Road will be appropriate and will enclose the streetscape and activate the Enniskerry Road, as agreed by the Planning Authority having regard to the recent grant of permission for Phase 1.

The boundary treatment along Enniskerry Road will predominantly comprise feature walls along the streetscape and open space. Tree planting and numerous pedestrian entrances will also be provided including to the Village Green. Lighting, seating and planting will all be co-ordinated along the Enniskerry Road boundary.

Part 3 the *Kiltarnan NFP* provides the following images:

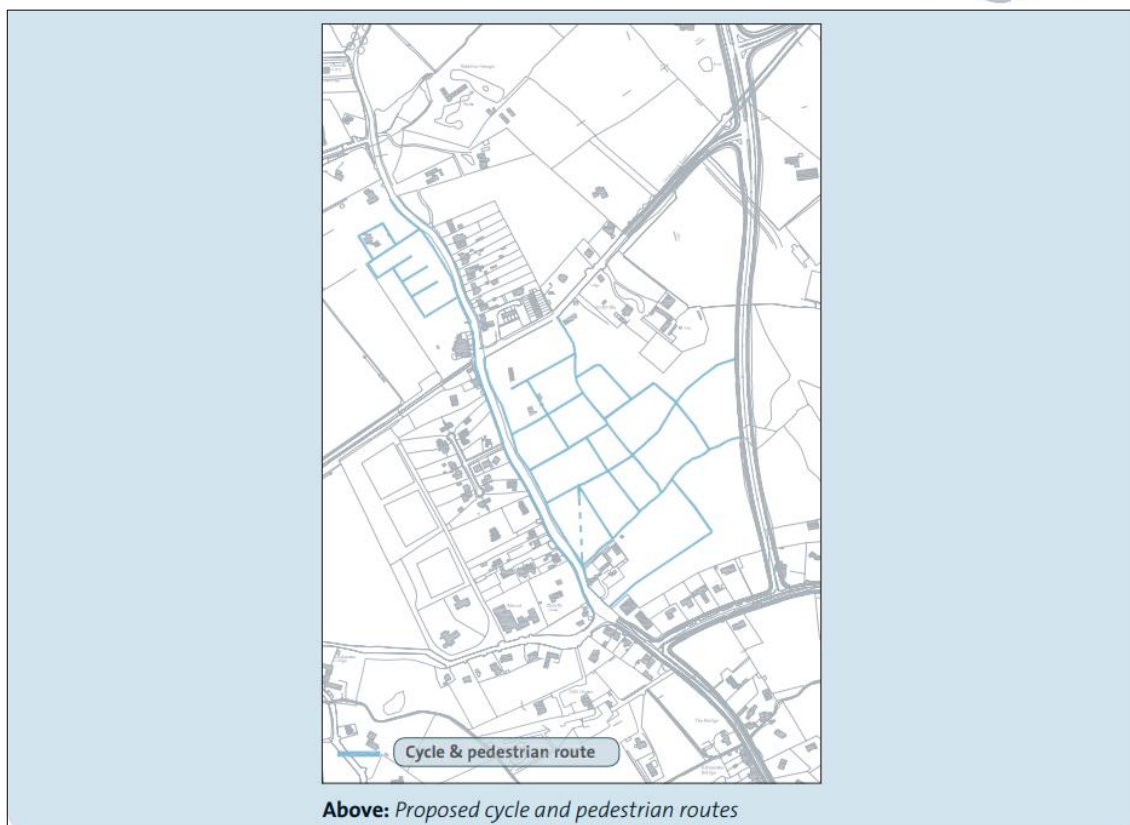


**Figure 7.9: Neighbourhood Edges and Views & Prospects of the Kilternan NFP**

(Source: **Kilternan NFP – Appendix to Kilternan LAP**)

The site includes stone wall edge to Enniskerry Road including openings for pedestrian access and trees planted along the boundary. In addition, there will be many views provided outwards from the new Village Green.

Part 3 of the *Kilternan NFP* provides the following image in relation to proposed cycle and pedestrian routes:



**Figure 7.10: Proposed Cycle and Pedestrian Routes of the Kilternan NFP**

(Source: **Kilternan NFP– Appendix to Kilternan LAP**)

The following specific aims are provided under the above images in the *Kilternan NFP*:

- "(i) To create a new link from the Link Distributor Road of the GDDRS to the Enniskerry Road which will be located as close as possible to the alignments illustrated.
- (ii) To create a new green route the 'Dingle Way' that connects Our Lady of the Wayside Church with the pedestrian route to the Dingle Glen.
- (iii) Generally to create a network of streets and cycleways that can operate in parallel with the Enniskerry Road and which will prioritise pedestrians and cyclists. A pattern of additional streets is shown outside the Framework Plan area to illustrate the concept of the connected street system."

Numerous pedestrian and cycle routes have been provided throughout the site generally in accordance with the above extract from the *Kilternan NFP*. This will significantly improve permeability for the village.

In relation to the specific aims, the scheme includes a link from the GLDR to Enniskerry Road (GLDR = Link Road noted in part (i) above). The Dingle Way route has been provided through the site from Enniskerry Road (fronting onto Our Lady of the Wayside Church), which will also link onto the GLDR. A multi-modal link has also been provided to the neighbouring Rockville<sup>38</sup>. The network of streets and cycleways provided on site prioritises pedestrians and cyclists and will operate in parallel with Enniskerry Road.

<sup>38</sup> Multi-modal connection that was recently permitted in the Phase 1 Application and in Rockville Phase 2B to the GLDR has been replicated in this LRD Application for completeness.



Part 3 of the Kilternan NFP states:

*'Developers of the neighbourhood centres will be required to develop a masterplan which will form the basis for individual planning applications. The masterplan will demonstrate compliance with this Framework Plan and will also include:*

- *Details of how the neighbourhood centres relate coherently to adjoining development areas.*
- *Details of how development and infrastructure will be phased including the provision of different uses and services that will serve an emerging community.*
- *Detailed design codes for building and landscape finishes and materials. Codes will also establish palettes for windows, door, railings, roof styles, skyline treatment, etc.*

*Once a masterplan is agreed different architectural, landscape designers and practices should be employed on significant planning applications to create a variety of design responses and to avoid repetitious and monotonous development.*

Dwg No. PL604 prepared by MCORM Architects set out the phasing plan for the development. Section 2.6 of the 'Summary Response to DLRCC LRD Opinion' prepared by Thornton O'Connor Town Planning. A summary of the overall estimated construction timelines is provided below:

LRD CONSTRUCTION	No of units	Commercial Sq.M	Months	Years	Start Month	End Month
Phase 1	83	2,225	18	1.50	Feb-25	Jul-26
Phase 2/2a	121	3,900	23	1.92	Mar-26	Jan-28
Phase 3	104		19	1.58	Jun-27	Dec-28
Phase 4	54		11	0.92	Apr-28	Feb-29
Phase 5	125		20	1.67	Jun-28	Jan-30
	<b>487</b>	<b>6,125</b>				
<b>Total Project Months/Years</b>			<b>60</b>	<b>5.0</b>		

As shown on the Plan, it is clear that the Neighbourhood Centre will relate coherently to the adjoining village i.e. easy access is provided to and from Enniskerry Road and the Village Green, which will also provide a high-quality green space along the Enniskerry Road streetscape. The proposed café and plaza space will also animate this streetscape. Details on phasing are included with the application and are outlined below or ease of reference:





**Figure 7.11: Proposed Phasing Plan for the Proposed Development**

**(Source: MCORM Architects Dwg. PL604, 2024)**

The 'Architectural and Urban Design Statement' and 'Landscape Design Statement' outline the relevant building and landscape finishes and materials, in addition to material palettes, etc. Having regard to the variety of unit types and uses proposed within the development, the scheme naturally avoids repetitious and monotonous development.

### 7.3 Summary

The proposed development to provide a mixed-use development comprising 487 No. residential units and a Neighbourhood Centre with public and communal open spaces fully accords with the relevant Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in Kiltarnan Village in the interests of sustainable development, whilst providing a scale of development that is appropriate to this suburban location.

## 8.0 CONCLUSION

Overall, it is our professional opinion that the proposed development will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing and a Neighbourhood Centre on underutilised lands at the heart of Kilternan Village.

The Neighbourhood Centre, Village Green, café and plaza space will provide an active frontage onto the existing Enniskerry Road, and the Dingle Way will provide a permeable connection from Enniskerry Road to the future Glenamuck Link Distributor Road (GLDR). It is considered that the subject development will represent the positive regeneration of the subject site. Permission has already been granted for Phase 1 of the subject LRD Planning Application (predominately areas fronting Enniskerry Road), and the Applicant intends to commence construction imminently, demonstrating their intention to develop this sustainable site in a timely manner.

It is considered that the proposed development is consistent with the relevant objectives of the *Development Plan* and *Local Area Plan* (which is now expired).

We trust that the submitted planning application pack is sufficient to allow the Planning Authority to fully assess the proposed development and to make a decision to grant permission for same.

Yours Sincerely,

*Patricia Thornton*

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**Patricia Thornton**  
**Director**  
**Thornton O'Connor Town Planning**