

Statement of Consistency and Planning Report

In respect of

Proposed Residential Development at Balroy House, Carpenterstown Road, Castleknock, Dublin 15

Prepared for

Glenveagh Homes Ltd.



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Executive Summary

The proposed development provides for 192 no. apartments in 5 no. apartment buildings, comprising 67 no. 1 bedroom apartments (34.8% of total), 104 no. 2 bedroom apartments (55.7%) and 21 no. 3 bedroom apartments (11%). In addition it is proposed to provide a creche and gym within the scheme along with 240 car parking spaces and a basement in the southern portion of the site all on a site of c. 1.77 hectares, located on the Carpenterstown Road, Castleknock, Dublin 15 (less than 9km from Dublin City Centre).

National and Regional Policy

The National Planning Framework recognises that *“currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.”*

The proposed development at Balroy House accords with the National Planning Framework (2018) (NPF), in particular with the principles of compact growth and the reinforcement of the country's existing urban structure. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements – and its objectives for the provision of homes at sustainable locations and increased residential density within settlements. A presumption in favour of the proposed development is considered to apply in accordance with NPF National Policy Objective 11.

Having regard to the above, the proposed development responds to the identified strategic need for a greater mix in the housing stock in urban areas. The proposed development will provide a variety of house types to accommodate a mix of household types, suitable for first time buyers, single people, families, empty nesters and the elderly, in order to ensure a social mix and balance is achieved.

The proposal will deliver much needed housing within the Metropolitan Area of the Greater Dublin Area in accordance with the aims of Rebuilding Ireland, and in particular Pillar 3, which seeks to build more homes – *“to increase the output of private housing to meet demand at affordable prices.”*

The proposal is in compliance with Specific Planning Policy Requirement 4 of the Urban Development and Building Height Guidelines (December 2018) which requires that developments meet the Sustainable Residential Development in respect of density, provides an appropriate mix of building heights and typologies and to avoid mono-type building typologies. The proposal provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) at 108 units per hectare.

The Apartment Guidelines 2018 recognise the importance of an appropriate mix within developments and seek to provide a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas. The proposal includes 34.8% 1 bedroom apartments, 55.7% 2 bedroom apartments and 11% 3 bedroom apartments.

The proposed development accords with the Guidelines for Planning Authorities on Sustainable Residential Development (SRD) in Urban Areas (2009), and could be best described as an infill site (on greater than 0.5 hectares), within a public transport corridor (c. 1km from Coolmine Train Station) and also having regard to its location within the existing footprint of developed areas in the locality, with Diswellstown located to the south, and Park Manor to the north.

The SRD note that a balance must be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The design approach is based on a need to protect the amenities of the surrounding residential development, where setbacks are proposed. In addition, the proposed development retains the trees along the boundaries. The design intent is to protect the amenities of the adjoining neighbours and general character of the area and its amenities.

The proposed development conforms to the more detailed guidance within the Guidelines on layout, design and density– by making effective use of the site, making a positive contribution to its

surroundings, having a sense of identity and place, providing for effective connectivity and featuring a design which is guided by the best principles of passive surveillance. The proposed development meets the 12 criteria for sustainable residential development contained within the Urban Design Manual (2009), a companion document to the SRD Guidelines.

The proposed development will make efficient use of land, be of high-quality design and integrate physical and social infrastructure, meeting the definition of a sustainable neighbourhood contained within Delivering Homes, Sustaining Communities (2007). The development will meet the criteria for the design of housing contained within the accompanying best practice guidelines, Quality Housing for Sustainable Communities (2007). The proposed apartments and associated communal spaces will conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments (2018).

Local Policy

Fingal County Development Plan 2017-2023

The proposed development accords with the relevant policies of the county plan's relevant development management policies, including with respect to residential development, social infrastructure, green infrastructure, heritage and protection of the natural environment.

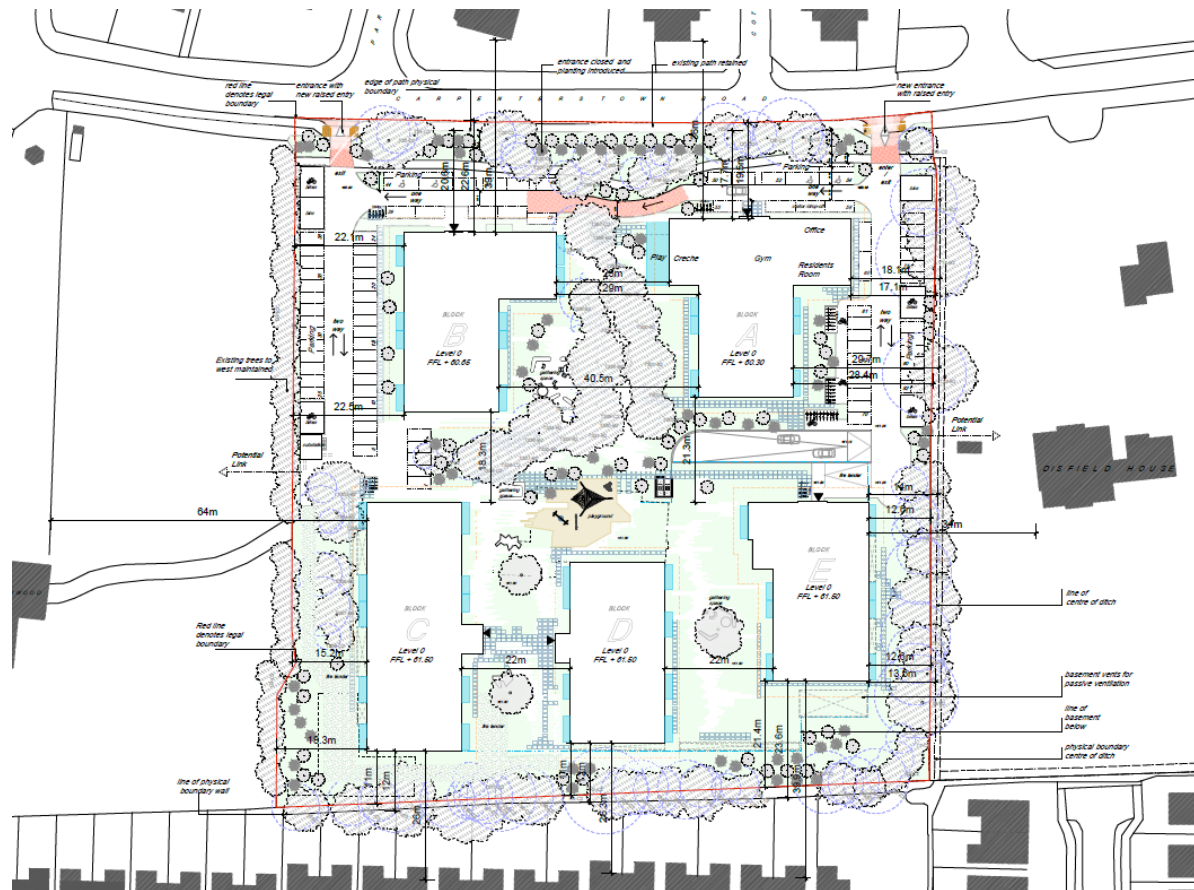
Conclusions

The proposed development is considered to be consistent with the proper planning and sustainable development of the area, Section 28 Guidelines and the local planning policy framework; a presumption in favour of the proposed development is considered to apply, and it is therefore respectfully submitted that the proposed development should be approved by An Bord Pleanála.

1.0 INTRODUCTION

- 1 On behalf of the applicant, Glenveagh Homes Limited, this Statement of Consistency and Planning Report has been prepared to accompany strategic housing development at Balroy House, Carpenterstown Road, Castleknock, on a site of c. 1.77 hectares.
- 2 In summary, The development will consist of the demolition of the existing 2 storey dwelling and ancillary buildings (c. 1,287 sq. m) and the construction of a residential development of 192 no. apartments (and ancillary facilities) in 5 no. 5 storey apartment buildings, comprising 67 no. 1 bedroom apartments, 104 no. 2 bedroom apartments and 21 no. 3 bedroom apartments (all apartments with balconies or terraces) as follows:
 - Block A (5 storeys) comprises 38 apartments consisting of 16 no. 1 bedroom, 19 no. 2 bedroom and 3 no. 3 bedroom apartments;
 - Block B (5 storeys) comprises 41 apartments consisting of 16 no. 1 bedroom, 22 no. 2 bedroom and 3 no. 3 bedroom apartments;
 - Block C (5 storeys over basement) comprises 46 apartments consisting of 12 no. 1 bedroom, 31 no. 2 bedroom and 3 no. 3 bedroom apartments;
 - Block D (5 storeys over basement) comprises 31 apartments consisting of 7 no. 1 bedroom, 20 no. 2 bedroom and 4 no. 3 bedroom apartments;
 - Block E (5 storeys over basement) comprises 36 apartments consisting of 16 no. 1 bedroom, 12 no. 2 bedroom and 8 no. 3 bedroom apartments;
 - The facilities (at ground floor of Block A) will comprise a creche (c. 174 sq. m), gym (c. 114 sq. m), residential amenity room (c. 40 sq. m) and security office (c. 22 sq. m);
 - Vehicular access to the development will be from 2 no. junctions onto the Carpenterstown Road (including secondary access [exit only] at western corner of lands in reconfigured arrangement to existing access) - existing access to be closed and planted and relocated to eastern corner of lands on Carpenterstown Road (layout to facilitate future cycle route at northern boundary);
 - 240 car parking spaces (82 surface car parking and 158 basement car parking); 180 no. basement cycle spaces (as well as bin storage and plant/stores at basement level) and 172 surface cycle spaces;
 - Provision of landscaped areas, circulation, paths, attenuation and all ancillary site development works, single storey ESB substation, single storey bicycle and bin stores, all on a site of c. 1.77 hectares, located on the Carpenterstown Road, Carpenterstown, Dublin 15.
- 3 This Planning Report and Statement of Consistency, prepared by John Spain Associates, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy.
- 4 This application is accompanied by a comprehensive range of documentation which specifically seeks to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017, and items raised by the Planning Authority during pre-application discussions and the relevant sections of the Fingal County Development Plan 2017-2023.

Figure 1.1 – Overall Masterplan



Source: DeB&M Architects

Figure 1.2 – Site Location with approximate extent of site outlined in red



(Source: Google Maps)

2.0 SITE AND DEVELOPMENT DESCRIPTION

2.1 Site Description

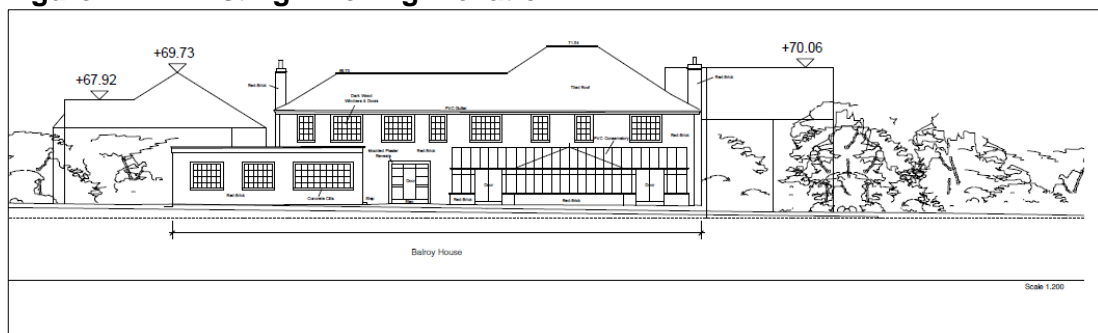
- 1 The subject site is located to the south of Carpenterstown Road, Castleknock, Dublin 15 to the west of the M50 and to the north of Diswellstown, a large residential development. St. Patrick's school and Diswellstown Community Centre are located to the south west. Castleknock Community College and a small neighbourhood scale retail location is located further to the west. The site area is approximately 1.77 hectares and is currently occupied by a residential property and ancillary buildings. A number of trees also exist at the site, primarily orientated on the north-south axis.
- 2 The subject site is surrounded by residential development on all sides and benefits from excellent transport links situated in close proximity to the M50, as well as nearby railway stops at Castleknock and Coolmine. The surrounding area is well served by educational, retail, community and recreational facilities, as set out in the Social Infrastructure and School Assessment, prepared by JSA, included with the SHD application.
- 3 The Site Layout Plan (Figure 1.1) prepared by DeB&M Architects shows the overall layout in context.

2.2 Description of Proposed Residential Development

2.2.1 Demolition

- 4 The development will consist of the demolition of the existing 2 storey dwelling and ancillary buildings (c. 1,287 sq. m) on the subject lands.

Figure 2.1 – Existing Dwelling Elevation



Source: DeBlacam & Meagher Architects

2.2.2 Proposed Apartments

- 5 The proposed development on an overall site of c. 1.77 hectares will comprise a residential development of 192 no. apartments as follows:

Table 2.1 – Overall Dwelling Mix

	1 bedroom	2 bedroom	3 bedroom	Overall
Apartments	67	104	21	192
Overall Mix	34.9%	54.1%	11%	

Source: De Blacam & Meagher Architects Schedule of Areas

- 6 Apartment units will be provided across 5 no. residential blocks, with Blocks A and B located in the northern part of the site, with the remaining Blocks C, D and E located to the south (over basement). The apartment buildings are 5 no. storeys in height, with generous set-back upper floors.

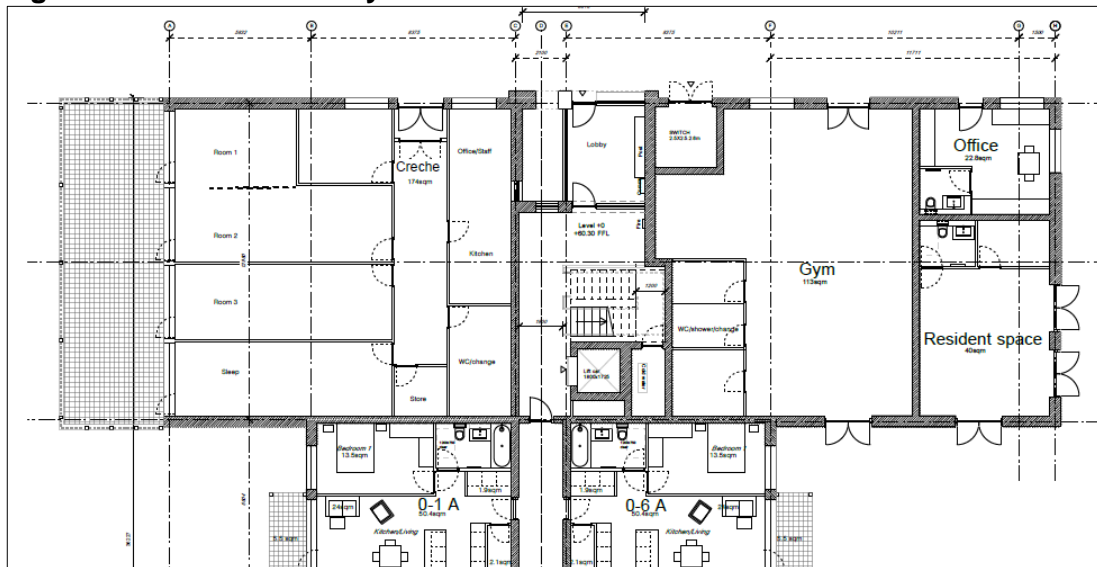
Figure 2.2 – View of proposed development between Blocks C and D looking northwards



- 7 Residential blocks have been located centrally on the site in order to provide sufficient distance from shared perimeters, with appropriate separation distances achieved between each block on site, and to the south.
- 8 The blocks are sited and designed in order to make optimum use of the brownfield land resource and promote higher density development in locations which benefit from good access to public transport. The site is zoned for residential development in the Fingal County Development Plan 2017-2023 and the proposals achieve this objective.
- 9 Having regard to the above, the proposed development responds to the identified strategic need for a greater mix in the housing stock in urban areas through the provision of apartment units at an accessible and well serviced location. This will introduce a mix of residential types to the area, which is predominately occupied by 2 no. storey detached and semi-detached homes at present, and enhance choice and variety to prospective occupiers.

2.2.3 Creche and Ancillary Uses

- 10 The proposed development includes a ground floor creche, located in Block A along with an external play area. The facilities (at ground floor of Block A) will comprise a creche (c. 174 sq. m), gym (114 sq. m), residential amenity room (40 sq. m) and security office c. 22 sq. m.

Figure 2.3 – Creche and Gym

Source: DeBlacam & Meagher Architects

2.3 Car Parking and Cycle Parking Provision

- 11 The scheme will provide adequate quantum of car and bicycle parking across the site considered appropriate in the context of the site's location and proximity to public transport links. Parking will be minimised at surface level in order to contribute to the prioritisation of pedestrian movement within the site, with the majority of car and bicycle parking located at basement level, accessed via a ramp alongside the eastern perimeter of the site.

Table 2.2 – Car Parking and Cycle Parking Provision

	Car Parking	Cycle Parking
Apartments	79 (surface) 113 (basement)	172 (surface) 180 (basement)
Visitor	3 (surface) 45 (basement)	(included in the above)
Overall	240	352

Source: De Blacam & Meagher Architects Schedule of Areas

- 12 The scheme will provide a sustainable quantum of car and bicycle parking across the site considered appropriate in the context of the site's location and proximity to public transport links. Parking will be minimised at surface level in order to contribute to the prioritisation of pedestrian movement within the site, with the majority of car and bicycle parking located at basement level, accessed via a ramp in the eastern portion of the site.
- 13 Appropriate parking provision has also been proposed to serve the crèche in Block A, as well as providing for drop off. The proposed quantum of parking has been considered through pre-application engagement with Fingal County Council roads department and OCSC Consulting Engineers and is further detailed within the accompanying Transport Impact Assessment.
- 14 The proposed parking levels are seen to comply with the standards set out by the 2018 Apartment Guidelines and provide 1 no. car parking space for each unit. An additional

49 no. visitor spaces are included, in accordance with the 1 no. space for every 4 no. units. A total of 352 no. bicycle parking spaces are provided which equates to 1 no. space per resident (330) and includes visitor parking. The proposed parking provision is considered appropriate in the context of the site's 'intermediate' location in the 2018 Apartment Guidelines, with accessibility to Dublin Bus and Commuter Rail at Carpenterstown Road and Coolmine rail station respectively.

2.4 Landscaping Strategy

- 15 The proposed development provides c. 0.5 hectares of open space centrally within the scheme, with c. 2,348 sq. m located between Blocks A and B, and a further 2,665 sq. m located above the basement area.

Figure 2.4 – Internal Landscaped Spaces



Source: Bernard Seymore Landscape Architects

- 16 The landscape strategy aims to integrate the new built development with the existing landscape through the retention of a significant number of existing trees on the site and the incorporation of these into a high-quality landscaping scheme. This is detailed within the accompanying Landscape Masterplan and rationale, prepared by Bernard Seymour Landscape Architecture.

- 17 The site layout and landscaping plan seeks to limit the use of the private car on site and prioritise pedestrian and cyclist movement. The internal road layout is limited to the northern perimeter and part of the eastern and western perimeters to provide access to Blocks A and B.
- 18 The focal point of the proposed landscaping scheme is a large central courtyard which is accessed by easily navigable pedestrian routes and provides a range of active and passive recreation. The central space also provides a children's play area and benefits from passive surveillance from the adjacent residential blocks, creating a sense of place for users.
- 19 The additional tree, shrub and hedgerow planting will consolidate the established setting of the site and reinforce its character, ensuring it integrates appropriately with adjacent land uses.

2.5 Basement

- 20 The proposed development includes a basement, located under Blocks C-E and includes car parking, cycle stores, bin stores providing 158 car parking space and 180 bike parking spaces. The bicycle stores are located at convenient locations beside the lift cores.

2.6 Drainage & Infrastructure

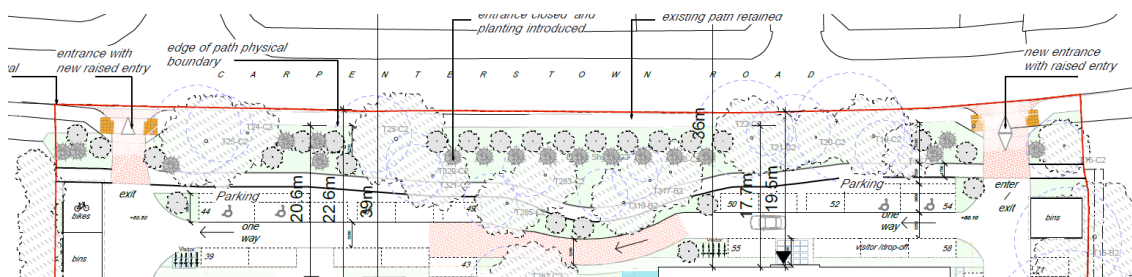
- 21 It is considered that the proposed development will make optimum use of the site's brownfield nature and existing infrastructure provisions currently in place at the location. This contributes directly to the sustainable development of the site.
- 22 In terms of surface water drainage, the proposed landscaping scheme incorporates SUDS features in the form of permeable paving, landscaping scheme and filter drains. Surface water will be attenuated on site before being discharged at a greenfield rate to the existing surface water sewer on Carpenterstown Road.
- 23 Foul water will also be disposed of to an existing foul water sewer on Carpenterstown Road, adjoining the site to the north. Irish Water have issued a Confirmation of Feasibility which notes that a connection to the existing sewerage network is viable. Water supply is secured from an existing watermain to the north of the site.
- 24 Details of the proposed foul and surface water strategy at the site is detailed within the accompanying Infrastructure Design Report prepared by OCSC Consulting Engineers.

2.7 Future Accommodation of GDA Cycle Track

- 25 It is noted the Carpenterstown Road includes the provision of a future long term GDA cycleway. Our understanding from OCSC is that there are no current design proposals for the GDA cycleway from the NTA. The proposed development as presented at pre-application stage showed how the GDA proposal could be accommodated within the existing Carpenterstown Road in cross section This provided a setback boundary that allowed for a cycleway adjoining the existing road. It is noted the Board's Opinion stated that the proposal "*was a reasonable basis for an application for strategic housing development,*" and that the Opinion did not seek further clarification on the arrangement. Nevertheless, the applicant engaged further with Fingal County Council (Planning, Roads and Landscape Departments) following the Board's Opinion, and met in July 2019 to discuss and agree the northern boundary arrangement.

- 26 While the design team provided a scheme layout which could accommodate a future GDA cycle track adjoining the public road (see figure 2.6), the feedback from FCC was that a route should be able to be accommodated internally within the scheme, so as to allow for the preservation of the townland boundary along the Carpenterstown Road.
- 27 The layout of the scheme is designed so that it can accommodate the preferred FCC option (Option A) of a route internally within the boundary of the scheme (connecting east and west) and also to accommodate the preferred Glenveagh Homes option of (Option B) a layout which uses the Carpenterstown Road only (with some small landtake along the boundary).

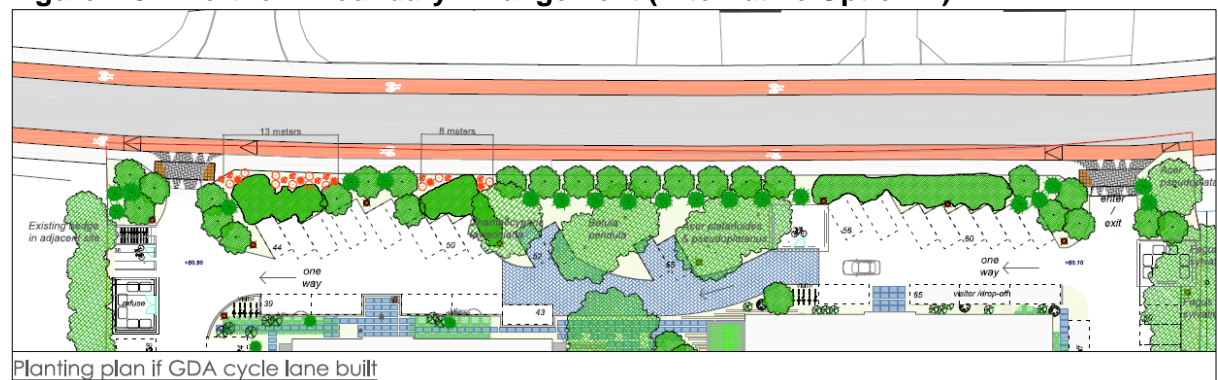
Figure 2.5 – Northern Boundary Arrangement (as submitted – Option A)



Source: DeBlacam & Meagher Architects

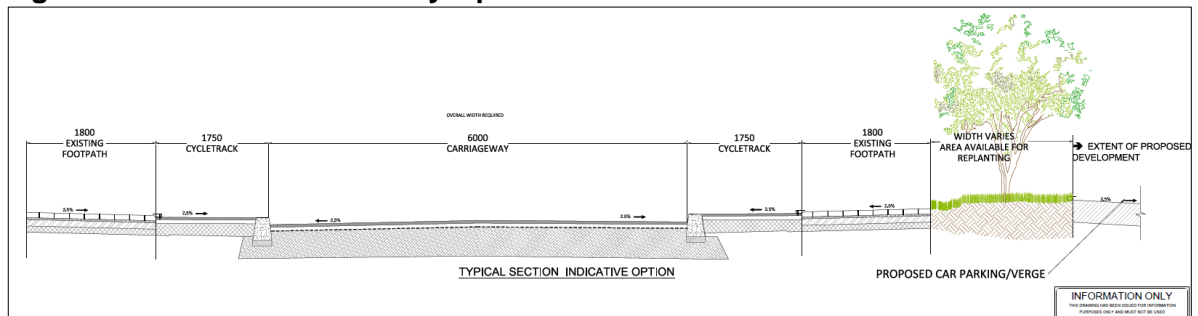
- 28 Figure 2.5 shows the northern boundary arrangement which could accommodate a future cycleway internally within the scheme (Option A). This option above (and layout) was subject to discussions with Fingal Co. Co. in July/September 2019 and was agreed by FCC as being acceptable in principle. This east west route is indicated as being taken in charge. In the event that this arrangement is considered acceptable, a drawing showing the area to be taken in charge could be submitted and agreed with Fingal County Council.
- 29 As noted above, alternatively, the GDA cycle route could be accommodated along the Carpenterstown Road. This is shown in OCSC Drawing No. G451-OCSC-XX-XXDR-C-0109 and on the Bernard Seymore drawing DN1819-03, and is referred to as Option B.

Figure 2.6 – Northern Boundary Arrangement (Alternative Option B)



Source: OCSC (Drawing No. G451-OCSC-XX-XXDR-C-0109)

- 30 The layout is also shown in cross section below:

Figure 2.7 – Northern Boundary Option B - Alternative

The net effect of the different options are as follows:

31 With reference to Option A:

- The development site only forms only a small portion of the cycle route frontage in respect of the Carpenterstown Road. The sites to the east and west are not currently part of any proposal to develop;
- There is a difference (loss) of 9 no. potential car parking spaces compared to Option B;

32 With reference to Option B:

- Sufficient space could be allowed for additional planting to be provided within the development site, effectively widening the existing green boundary;
- Reduces potential conflict with vehicles' access and exit.
- The additional planting would serve to reinforce the existing green boundary, providing an enhanced amenity value. By the time the cycle track comes to fruition, this additional planting would have fully established.
- Simplifies to provision of the overall cycle route along the entirety of Carpenterstown Road as it would be less reliant on the development of neighbouring sites and would limit the extent of land acquisition required.
- Allows the introduction of angled car parking along the northern front of the development which would increase the overall parking provision at the development by 9 no. spaces

33 In acknowledgement of FCC's requirements, the scheme presented to An Bord Pleanála includes the internalised cycle track and associated modifications to the scheme design. However, based on a comparison of the two options presented, the applicant's preference in this instance is Option B, to provide the cycle path adjoining Carpenterstown Road. The applicant invites the Board to include a condition regarding the Board's preferred configuration along Carpenterstown Road.

3.0 PLANNING HISTORY

3.1 Subject Lands

3.1.1 Planning Reg. Ref.: FW12A/0054

- 1 Under Planning Reg. Ref. FW/12A/0054, Fingal County Council granted planning permission to the NGM Partnership for development comprising:

'A 151 bedroom 2 and 3 storey nursing home including modifications to, partial demolition of, and change of use of the existing dwelling house (two storey) to accommodate reception, social, consultation and treatment rooms the construction of two story glazed links to two blocks Block A (three storey and part basement) accommodating chapel, mortuary, 75 no single bedrooms, 2 no double bedrooms (total 77 bedrooms or 79 bed spaces) Block B (three storey) accommodating 50 no single bedrooms, 14 no double bedrooms (total 64 bedrooms or 78 bed spaces) kitchen and ancillary facilities. Two storey service annexe including plant rooms, transformer rooms, laundry and staff facilities Ancillary lounges, dining, sitting rooms and treatment rooms, terraces and balconies to each block (total 141 bedrooms or 157 bed spaces) Demolition of existing caretakers dwelling and stables (single storey) Ancillary site works and landscaping including modifications to existing entrances, construction of 61 no parking spaces and ancillary works, fencing, gates and boundaries'.

- 2 Planning permission was granted subject to 13 no. conditions.

3.1.2 Planning Reg. Ref.: FW12A/0054/E1

- 3 Fingal County Council granted an extension of duration relating to the FW12A/0054 permission up until the 3rd December 2022.

4.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

- 1 The key provisions of national and regional planning policy as it relates to the proposed development is set out in the following sections.

4.1 National Planning Framework

- 2 The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 3 As a strategic development framework, 'Project Ireland 2040' sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

4.1.1 National Strategic Outcomes

- 4 The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.
- 5 Chapter 4 of the National Planning Framework seeks to make urban places stronger *"to enhance people's experience of living and working in and visiting urban places in Ireland."*
- 6 The following is outlined:
- 7 National Policy Objective 3a of the Draft NPF states that it is a national policy objective to *"deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements"*.
- 8 National Policy Objective 4 states *'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'*.
- 9 National Policy Objective 33 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*
- 10 National Policy Objective 34 - *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*
- 11 National Policy Objective 35 - *Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

4.1.2 Evaluation of Consistency

- 12 The proposed development accords with the National Planning Framework (2018) (NPF), in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels. Where housing policy is concerned, the

proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements.

- 13 In accordance with the NPF's strategy of compact growth, it is proposed to develop new homes within an infill site.
- 14 In accordance with National Policy Objective 33, new homes will be provided at a sustainable location, with access to existing services and facilities, including commuter rail located at Coolmine rail station, approximately 1.1km north of the site, and Dublin Bus service no. 37 accessed from stops on Carpenterstown Road circa 375 metres west of the site. In accordance with National Policy Objective 35, the proposal will increase residential density within the built-up area of Dublin and contribute to compact growth at an underutilised brownfield site.
- 15 The Social Infrastructure and School Assessment, included with the application, provides detail of the wide-ranging social infrastructure and amenities available for the future residents of the scheme.

4.2 Rebuilding Ireland – Action Plan for Housing and Homelessness

- 16 Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.
- 17 Rebuilding Ireland is set around 5 no. pillars of proposed actions. Pillar 3 seeks to – *“Build More Homes: Increase the output of private housing to meet demand at affordable prices.”*

4.2.1 Evaluation of Consistency

- 18 The proposal will deliver much needed housing within the Metropolitan Area of the Greater Dublin Area in accordance with the aims of Rebuilding Ireland, and in particular Pillar 3, which seeks to build more homes – *“to increase the output of private housing to meet demand at affordable prices.”*

4.3 Regional Economic and Spatial Strategy 2018

- 19 The Regional Economic and Spatial Strategy (RSES), which was adopted in June 2019, notes that the preferred spatial strategy for the Eastern and Midlands is the consolidation of Dublin plus the Regional Growth Centres of Athlone, Dundalk and Drogheda, supported by planned focussed growth of a limited number of self-sustaining settlements.
- 20 The subject lands are located within the Dublin Metropolitan Area. According to the RSES, the Dublin Metropolitan Area (DMA) is focused on the national capital city, which is the lead settlement in the country, the main gateway into the nation and the largest economic contributor in the state noting that Dublin leads the settlement hierarchy for not only the Region but also the state, with no other comparable settlement within the urban structure.

4.3.1 Metropolitan Area Strategy

- 21 The MASP supports the overall Settlement Strategy as set out in Chapter 4 and sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area focussed on:
- Consolidation of Dublin city and suburbs;
 - Key Towns of Swords, Maynooth and Bray; and
 - Planned development of strategic development areas in Donabate, Dunboyne, Leixlip, and Greystones.
- 22 The delivery of identified strategic development areas should be facilitated, where practicable, in a sequential manner to promote sustainable compact growth in coordination with the provision of enabling infrastructure and services.

4.3.2 Evaluation of Consistency

- 23 The proposed infill development will consolidate the existing built up area of the Dublin Metropolitan Area and promote sustainable compact growth with access to public transport (Irish Rail [c.1km from site] and Dublin Bus services).

5.0 STATEMENT OF CONSISTENCY WITH SECTION 28 GUIDELINES

5.1 Urban Development and Building Heights (December 2018)

- 1 The Urban Development and Building Heights contain SPPR 4 which requires:

“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2009)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

5.1.1 Evaluation of Consistency

- 2 The proposed development provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) at c. 108 units per hectare (net), and is therefore in compliance with point no. 1 in SPPR4 of the Building Height Guidelines.
- 3 The proposal includes heights of 4 no. storeys plus a setback upper floor across 5 no. residential blocks. The development has been sensitively designed in the context of the nature of adjacent residential development existing to the east, west and south at Diswellstown Road, which consists primarily of 2 no. storey dwellings.
- 4 The proposals are seen to be compliant with the Height Guidelines which make provision for buildings in excess of 4 no. storey development which integrates appropriately with its surroundings through high quality design and layout and makes

effective use of the screening of existing trees at the location which are to be retained within the proposals.

- 5 The apartment development consists of a mix of typologies, with a greater concentration of 1 and 2 no. bed units which consist of 34% and 55% of the total dwellings. A total of 11% of 3 no. bed apartments are also included. Unit typologies are distributed equally across the 5 no. blocks and with all apartments meeting or exceeding minimum size requirements, and therefore complies with point no. 1 in SPPR4.
- 6 This pre-application consultation request is accompanied by Specific Assessments which assess the potential impacts of the development upon adjoining uses in terms of sunlight, daylight and overshadowing. These reports note that the proposals will not have an unacceptable impact upon the amenity of existing adjoining uses, justifying the proposed building heights.

5.2 Sustainable Urban Housing: Design Standards for New Apartments 2018

- 7 Updated Sustainable Urban Housing Design Standards for New Apartments were published in March 2018. The guidelines provide for revised guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

5.2.1 Evaluation of Consistency

- 8 The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

Specific Planning Policy Requirement 1 (Mix)

- 9 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).
- 10 The Proposed development complies with SPPR 1 as it includes 192 no. apartments in 5 no. apartment buildings, comprising 67 no. 1 bedroom apartments (34.8% of total), 104 no. 2 bedroom apartments (55.7%) and 21 no. 3 bedroom apartments (11%).

Specific Planning Policy Requirement 3 (Minimum Areas)

- 11 The proposed development complies with the minimum apartment floor area requirements set out in SPPR3.

Specific Planning Policy Requirement 4 (Aspect)

- 12 According to the Apartment Guidelines, 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. The proposed development includes 54% dual aspect units.

Specific Planning Policy Requirement 5 (floor to ceiling heights)

- 13 The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level (other floors 2.4m).

Specific Planning Policy Requirement 6 (Max units per core)

- 14 SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes. The guidelines state that 'a maximum 12 apartments per floor per core may be provided in apartment schemes. Block A provides 9 no. apartments per floor per core; Block B 9 no. apartments per core; Block C 10 no. apartments per core & Block D 7no. apartments per core, while Block E has 9 no. apartments per core. The proposal complies with this SPPR6.
- 15 This application is accompanied by a Housing Quality Assessment, prepared by De Blacam Meagher Architects, which demonstrates that the proposed apartments and associated communal spaces will conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments.
- 16 The subject site is considered to be located in an '*Intermediate Urban Location*' in the context of the 2018 Apartment Guidelines as the site is within walking distance (c. 1 km) of Coolmine railway station which provides a frequent commuter rail service, and within easy walking distance (375 metres) of Dublin Bus stops, served by route no. 37 which serves Carpenterstown Road to the west.
- 17 In this respect, the site is considered to be '*generally suitable for smaller-scale, higher density development that may wholly compromise apartments*' which will broadly consist of density greater than 45 dwellings per hectare. The proposed density of c. 108 units per hectare is considered appropriate at the location basis on compliance with the Guidelines.

5.3 Sustainable Residential Development in Urban Areas (2009)

- 18 The Sustainable Residential Development in Urban Areas (SRD) Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. To assist with this, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.
- 19 The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 and '*the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, **with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...***' (emphasis added)
- 20 Section 5.8 of the Guidelines recommends that '*in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes*'. The proposed density of the site is c.108 no. units per hectare.

5.3.1 Evaluation of Consistency

- 21 The subject lands currently comprise a single dwelling on a site of c. 1.77 hectares, which is clearly not a sustainable density, having regard to the subject site's location within the metropolitan area of Dublin and also in proximity to the Maynooth suburban railway line (c. 1km from Coolmine station). It is one of the small opportunity sites within the catchment of Coolmine rail station and will provide for a sustainable density which will support the substantial investment in public transport which includes the electrification of the Maynooth rail line.
- 22 Having regard to the above, the subject infill site is zoned for residential purposes under the Fingal County Development Plan 2017-2023. The Development Plan adopted a sequential approach when zoning the land for development therefore the location of the site and the zoning pertaining to the development is appropriate for the subject proposal relating to this planning application
- 23 The subject lands are located adjacent to '*Public Transport Corridors*' in the context of the densities required under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). These areas are defined as being located within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station.
- 24 The subject site is located c. 500m walking distance of a bus stop and is also approximately 1km from the Coolmine rail station.
- 25 To achieve this increased density in a sustainable manner requires increased building heights to make the most of the zoned residential lands. As such, in order to sustainably deliver increased densities for residential development within existing urban areas, within increasing urban sprawl then increased heights must be considered in appropriate locations.
- 26 The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas is to ensure the '*plan led*' delivery of new development throughout the country.
- 27 The proposed development accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and could be best described as a large infill site and within the range of a public transportation corridor, comprising the Maynooth line which is to be electrified. The SRD Guidelines note that a balance must be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. It is considered that the proposed development has been carefully designed to propose a sustainable density (which will support the public investment in rail transport as part of the GDA Transportation Strategy – electrification of Maynooth line), while also protecting the amenities of the surrounding residential development and general character of the area and its amenities.
- 28 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 criteria are discussed in detail below. This SHD application is accompanied by a Design Statement, prepared by De Blacam and Meagher Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with

best practice in respect to urban design. The Design Statement should be read in conjunction with this Statement of Consistency with Planning Policy and with the plans and particulars accompanying this submission.

5.3.2 Urban Design Manual – A Best Practice Guide (2009)

Figure 5.1 – Urban Design Manual 12 criteria



Source: Urban Design Manual DoEHLG 2009

- 29 The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on *"a distillation of current policy and guidance and tried and tested principles of good urban design."* The 12 no. criteria are assessed as follows:

5.3.3 Context: How does the development respond to its surroundings?

- 30 The proposed development responds to its surroundings by integrating appropriately with its existing woodland setting through a high-quality landscaping strategy which retains a significant number of trees on site and consolidate this will additional planting. The site benefits from perimeter screening in the form of trees and hedgerows at each boundary which will be retained to the greatest possible extent to mitigate any visual impact on the surrounding environment. This is assessed further within the accompanying LVIA prepared by Macroworks.
- 31 The site is zoned for residential purposes and has most recently been in residential use. Residential development neighbours the site on each side, with higher density development to the north and south, with single dwellings to the east and west. The proposals are therefore compatible with adjacent uses and will achieve the site's zoning objective through the provision of appropriately scaled and designed residential apartment use.

- 32 The development will provide attractive streets and open spaces, high quality buildings and feature setbacks from neighbouring dwellings, particularly to the south at Diswellstown. The apartment blocks are located centrally within the layout, away from sensitive boundaries and Blocks A and B provide a high quality frontage to Carpenterstown Road to the north, with the hedgerow at this location preserved to soften the frontage to the public road and assist with integrating the development with the surrounding landscape.

5.3.4 Connections: How well is the new neighbourhood / site connected?

- 33 The proposed development features provides 2 no. points of access to Carpenterstown Road which forms the site boundary to the north. These provides access and egress for vehicles, cyclists and pedestrians. Roadways are limited to the northern perimeter and part of the western and eastern perimeters of the site to allow access and parking to Blocks A and B, as well as facilitating visitor and disabled access.
- 34 The site is located within 375 metres of Dublin Bus stops on Carpenterstown Road to the west, with Coolmine rail station approximately 1km metres to the north. These public transport facilities enhance the site's accessibility and are complemented by the emerging GDA Cycle Route adjoining to the north. The M50 is located a short distance to the east, providing access to the wider region.

5.3.5 Inclusivity: How easily can people use and access the development?

- 35 The proposed development includes apartment units which are easily accessible for all to use. Vehicular movement is limited to the northern part of the site, with pedestrian movement prioritised. This provides access to Blocks A and B, with basement parking also provided via a ramp at the eastern perimeter of the site. This provides convenient access to the blocks C, D and E at the southern part of the site.
- 36 The internal road layout includes visitor and disabled car and bicycle parking spaces, and a drop-off area located near Blocks A and B, which also provides easy access to the crèche facility at Block A. Access to the site is located at the eastern side at the northern perimeter. A second entrance (exit only) is provided at the northern western corner of the site. This ensures adequate access to and from the site from Carpenterstown Road and will help to segregate traffic utilising the crèche and drop-off spaces associated with Block A. This will enable easy access and egress for vehicles using the crèche and help to reduce interaction with resident traffic.
- 37 Apartments are designed to be suitable for mobility impaired persons, which include bedrooms at ground floor allowing for ease of access as needs change and access to upper floors become difficult. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M.
- 38 The overall development will include 10% social housing which will be provided within the scheme.
- 39 The development will provide for disabled car parking spaces and all communal areas and house types are designed to be accessible to all.

5.3.6 Variety: How does the development promote a good mix of activities?

- 40 The proposed development provides for a good mix of apartment types including a variety of 1, 2 and 3 no. bedroom units. These are evenly distributed across each of the 5 no. residential blocks. The focus on 1 and 2 no. bedroom units is considered appropriate to meet current market demand and falling household sizes.
- 41 The proposed development provides c. 0.5 hectares of open space centrally within the scheme, with c. 2,348 sq. m located between Blocks A and B, and a further 2,665 sq. m located above the basement area. This ensures that the development prioritises its use by residents and provides a high-quality landscaping scheme which includes easily navigable streets and public spaces which promotes social interaction and a range of passive and active recreation.
- 42 Communal facilities are provided at ground floor level of Block A, in the form of a gym and residents room. A crèche is also provided at Block A, with an adjoining children's play area to the west. An ancillary management office is also provided. The volume of bicycle parking across the site promotes the bicycle as a sustainable form of travel and will encourage the use of the proposed GDA Cycle Route on Carpenterstown Road adjoining to the north.
- 43 The proposed development includes for a substantial amount of usable open space in the form of active and passive open space as well as a children's play area, all of which will cater for a wide range of population.

5.3.7 Efficiency: How does the development make appropriate use of resources, including land?

- 44 The proposed development proposes 192 no. dwellings on a site of c. 1.77 hectares resulting in a density of c. 108 no. units per hectare. This density makes efficient use of the residential zoned land, which is located adjacent to a public transportation corridor (Maynooth Railway line) and c. 1 km from a train station (Coolmine). This line is to undergo electrification as part of the GDA Transportation Strategy 2035 and will result in higher frequency service and an extension of the existing DART network. In addition, the subject site is located c. 375 m from the no. 37 bus route which serves the Carpenterstown Road.
- 45 The proposed GDA Cycle Network, (as identified on the Fingal CDP land use map) is located along the northern frontage of the site on the Carpenterstown Road. The proposed development has been designed to accommodate the future GDA Cycle network, whereby provision is made for an east west connection internally within the northern portion of the subject site. Alternatively, the cycleway could also be accommodated within the general layout of the Carpenterstown Road, subject to some minor alterations to the frontage. This is set out above in Section 2.7 and in OCSC Infrastructure Report. This alternative option of the arrangement is shown in OCSC Drawing No. G451-OCSC-XX-XXDR-C-0109. The applicant would be happy for the Board to include a condition.

5.3.8 Distinctiveness: How do the proposals create a sense of place?

- 46 In this case, the Site Layout Plan has been devised to provide a legible, permeable layout which allows for future connections to the east and west if required. The design

intent is to provide a centrally located area of open space and to use the existing trees within the design. The Landscape Rationale prepared by Bernard Seymour Landscape Architects sets out in detail the landscaping– all of which will form a strong and positive identity for the proposed development.

5.3.9 Layout: How does the proposal create people-friendly streets and spaces?

- 47 The proposed site layout plan provides for a legible, permeable and distinctive layout, which prioritises pedestrian movement and seeks to reduce the presence of the private car. Roadways are limited to the northern perimeter and part of the western and eastern perimeters of the site to allow access and parking to Blocks A and B, as well as facilitating visitor and disabled access.
- 48 The central area of the site provides exclusive access for pedestrians and can be easily navigated owing to the high-quality landscaping scheme and legibility of layout. Public open space is focused at the centre of the site and provides a range of passive and active facilities, as well as a children's play park. This benefits from passive surveillance from the adjacent residential blocks which also relays a sense of place on site.
- 49 The structure of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above.
- 50 The internal layout has been designed with pedestrian and cyclists to the forefront and with traffic safety in mind. Reduction of vehicle speed is a fundamental principle behind the layout and the site includes shared surfaces and permeable paving to raise speed awareness and promote traffic calming – all in accordance with best practice (DMURS).
- 51 The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists and vehicles. The layout prioritises pedestrian permeability and seeks to reduce the use of the private car, with car parking primarily located at basement level.

5.3.10 Public Realm: How safe, secure and enjoyable are the public areas?

- 52 The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered to ensure a high level of passive surveillance on both the area of open space and public access areas. The siting, layout and design of the residential blocks provide for a frontage onto centrally located public areas ensuring the provision of a safe, secure and enjoyable residential development.
- 53 The location layout and usability of the proposed public open space areas are of a high quality and will contribute positively to the residential amenity of future residents. The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high-quality finish as illustrated on the Landscape Masterplan prepared by Bernard Seymour, Landscape Architects, and the Landscape Rationale which confirms a high degree of amenity for future residents of the scheme.

5.3.11 Adaptability: How will the buildings cope with change?

- 54 Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of 1, 2- and 3-bedroom apartment units.
- 55 The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed house types incorporate generous space standards to provide for adaptable living requirements. The enclosed building lifecycle report provides detail on the robustness of the materials reducing future running costs etc.

5.3.12 Privacy / Amenity: How do the buildings provide a high-quality amenity?

- 56 Each dwelling is provided with an area of useable private open space which meets or exceeds the Development Plan standards. All dwellings meet or exceed the Section 28 Guidelines unit size requirements. The design of dwellings has also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling.
- 57 The development provides for adequate separate distances of at least 22m between the proposed apartment blocks and existing dwellings. This maintains a high level of privacy and amenity obtained by residents and reduced the level of overlooking and overshadowing. The proposals have been designed to allow for appropriate separation distances and the proposed development steps down to 3 storeys at southern elevations of Blocks C and D with separation distances of c. 36m-40m to the Diswellstown development, located to the south. With reference to the lands to the east, the apartment buildings are c. 13.6m from the boundary and c. 34m to the existing dwelling (Disfield House). Block C is located c. 15.2m from the western boundary and c. 64m from Winterwood House, located to the west.
- 58 The trees along both the eastern, western and southern boundaries are to be kept in place. This is also the case at the southern boundary where existing trees and hedgerow will be retained. All boundaries will be consolidated by additional planting to enhance screening and ensure the development integrates with the surrounding landscape with minimal visual impact. This additional planting is detailed further within the accompanying Landscape Masterplan and Rationale by BSLA.
- 59 In this regard, reference should be made to Housing Quality Assessment prepared by De Blacam & Meagher Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.
- 60 In summary, it is confirmed that each proposed residential unit has an area of useable private outdoor space as well as being in accordance with storage requirements.

5.3.13 Parking: How will the parking be secure and attractive?

- 61 In this case, car parking is provided primarily at basement level in order to prioritise pedestrian and cyclist movement at surface level. Parking for both cars and bicycles at basement level is accessed via a ramp on the eastern side of the site and is secured for exclusive access by residents only. A smaller number of surface car parking

spaces, including visitors parking and drop off spaces, are located to the north and west of Block A, to facilitate access to the communal facilities at this location.

62 Bicycle parking will be secure and covered. The prominence of bicycle parking provision seeks to promote travel by bicycle as an alternative to the private car.

63 A total of 240 car parking spaces are provided at the site, with 352 no. bicycle spaces, including accessible and visitor spaces. This quantum of parking is considered acceptable having regard to the site's location in respect of Dublin Bus services no. 37 at Carpenterstown Road and commuter rail at Coolmine station, to the west and north respectively.

5.3.14 Detailed Design: How well thought through is the building and landscape design?

64 The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by De Blacam & Meagher Architects. The landscape design rationale is set out in the Landscape Masterplan and Rationale prepared by Bernard Seymour Landscape Architects.

65 The proposed landscaping aims to enhance the overall biodiversity and ecology of the area which will improve the overall character and visual amenity of the development. Full details on the rationale for the landscaping design can be found in the tree survey, ecology report and landscape plan which accompanies this pre-application request.

5.4 Delivering Homes, Sustaining Communities (2008)

66 The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes.

67 They encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

5.4.1 Evaluation of Consistency

68 The proposed development has taken regard of this departmental policy in its design and development and is observed to promote a high-quality residential scheme which makes optimum use of an area of brownfield land in a strategic location and promotes a sense of community.

5.5 Design Manual for Urban Roads and Streets (DMURS) (2013)

69 The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads

and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

5.5.1 Evaluation of Consistency

- 70 The Infrastructure Design Report prepared by OCSC Consulting Engineers provides further detail in respect of the consistency of the proposed development with DMURS.
- 71 The site layout encourages permeability through appropriate block sizes and allows for future potential connections, if required. Vehicular movement is minimised at the site and restricted to the northern segment of development, with car parking primarily located at basement level. The basement parking area is access via a ramp adjacent to the eastern perimeter of the site.
- 72 Fire tender access is permitted to the southern part of the site via a shared surface / permeable paving along the western perimeter of the site.
- 73 In addition, the design of the internal access roads include a number of restrictive road bends, shared surfaces and traffic calming measures which will ensure low vehicular speeds within the northern part of site protecting the vulnerable road users whilst promoting pedestrian safety in close proximity to Block A, in proximity to the communal facilities and crèche.
- 74 Long straight stretches of road are avoided where possible and gentle curves and other traffic calming measures are utilised in road sections which respond to topography, layout requirements and guidance within DMURS.
- 75 Potential east west connectivity is also provided through the accommodation of reservation for future GDA cycle network if required, within the northern boundary.

5.6 Guidelines for Planning Authorities on Childcare Facilities (2001)

- 76 Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.

5.6.1 Evaluation of Consistency

- 77 It is proposed to provide a crèche facility as part of the development located at Block A. This will provide space for approximately 34 no. childcare places in accordance with the provisions of the Childcare Facilities Guidelines and will be served by 10 no. car parking spaces, located adjacent to the facility near the site entrance.
- 78 Under existing guidelines, it is proposed that 20 childcare spaces are required per 75 units in a development. This excludes 1-bedroom units (as per paragraph 4.7 of the

Apartment Guidelines 2018). This would reduce the overall number of units to 125. This creates a requirement for 33 childcare spaces (125/75 x 20).

- 79 It is estimated that this childcare facility could cater for the in the order of 34 children having regard to an accepted industry average of c. 3 sq. m to 4 sq. m gross floor space per child depending on the type of childcare offered by the end user. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's requirements and will be dependent on what types of childcare facility are already available in the area. In this regard flexibility is required in respect to the future fit out and type of childcare facility proposed within the development.

5.7 Draft Water Services Guidelines for Planning Authorities 2018

- 80 The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.
- 81 The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.
- 82 The key aims of the Guidelines are to:
- *Provide advice to planning authorities on the operational framework within which Irish Water must operate to deliver water services,*
 - *Establish mechanisms for effective engagement between planning authorities and Irish Water across all the relevant functions of planning authorities, and*
 - *Set out how the planning system, in setting out a spatial framework for growth and development, will relate to and inform the planning and delivery of water services by Irish Water at a national, regional and local level.*
- 83 The Draft Guidelines state that it is a requirement for Strategic Housing Development applications to contain evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.

5.7.1 Evaluation of Consistency

- 84 OCSC Consulting Engineers have consulted with Irish Water on the design of the development and a confirmation of design dated 7th of October 2019 is included with SHD application material.

5.8 Transport Strategy for the Greater Dublin Area 2016 - 2035

- 85 This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030.

- 86 The Strategy includes five overarching objectives to achieve the vision which are as follows:
- Build and strengthen communities
 - Improve economic competitiveness
 - Improve the built environment
 - Respect and sustain the natural environment
 - Reduce personal stress
- 87 The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.
- 88 The strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government's transport 21 investment framework are included in all of the strategy options.

5.8.1 Evaluation of Consistency

- 89 The proposed development is located c. 1 km from the Maynooth railway line which is identified for improvement (electrified). Furthermore, the Carpenterstown Road is identified as a GDA Cycle route. This has been allowed for in the design of the proposed development, if required. Alternatively the route can be accommodated within the existing carriageway along Carpenterstown Road.

5.9 Guidelines for Planning Authorities on '*The Planning System and Flood Risk Management (November 2009)*'

- 90 *The Planning System and Flood Risk Management* Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

5.9.1 Evaluation of Consistency

- 91 In order to comply with these Guidelines a review of the flood risk relating to the site is included in the Infrastructure design report, prepared by OCSC to inform the pre-application consultations.
- 92 A flood risk assessment for the site was undertaken as part of the preparation of this SHD application. The assessment indicates that there is no apparent risk of internal property flooding for a design 100-year return period pluvial rainfall event. The site is located outside of Flood Zone A and Flood Zone B of the predicated 1% AEP flood extent of the River Tolka (1.9km north) and the River Liffey (1.25km south). As a result, OCSC note that the site is not considered to be at significant risk from pluvial flooding.

5.10 Appropriate Assessment

- 93 We refer the Board to the enclosed Appropriate Assessment screening report prepared by Enviroguide Consultants, which concludes that: *“This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network.”*

6.0 CONSISTENCY WITH LOCAL PLANNING POLICY – FINGAL COUNTY DEVELOPMENT PLAN

- 1 The site is located within the administrative area of Fingal County Council and is therefore subject to the land use policies and objectives of the Fingal County Development Plan 2017-2023 (CDP).

6.1 Core Strategy

- 2 The Core Strategy projects a likely need for 49,536 additional residential units in Fingal over the period from 2016 - 2026. Consolidation and sustainable intensification in established urban areas and existing towns, through infill development and brownfield redevelopment, is a priority. The most important priority for Fingal is to ensure that there is sufficient land zoned in the right places to meet the housing targets up to 2023 in the first instance, recognising that much of this may not be completed until after that date. This will involve consolidating urban areas around the Dublin Gateway and making the most efficient use of investment in infrastructure through integration with land use planning policy.

- 3 The key principle of the overall settlement strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure.

- 4 The following objectives relate to Settlement Strategy;

Objective SS01 - Consolidate the vast majority of the County's future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the hinterland to towns and villages, as advocated by national and regional planning guidance.

Objective SS02 Ensure that all proposals for residential development accord with the County's Settlement Strategy and are consistent with Fingal's identified hierarchy of settlement centres.

Objective SS15 Strengthen and consolidate existing urban areas adjoining Dublin City through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.

Objective SS16 Examine the possibility of achieving higher densities in urban areas adjoining Dublin City where such an approach would be in keeping with the character and form of existing residential communities or would otherwise be appropriate in the context of the site.

- 5 The proposed residential development, which provides for a net density of c. 108 units per hectare, on zoned serviced lands in the metropolitan area of Dublin City and benefits from existing infrastructure and access to public transport is considered to

constitute the efficient reuse of brownfield, infill land which has an established residential use.

6.2 Land Use Zoning

6 The subject site is zoned 'RS' - *'Provide for residential development and protect and improve residential amenity'*.

7 Residential and Open Space are permitted in principle uses.

8 The vision for the RS land use zoning objective is to:

"Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity".

6.3 Design Principles

9 The following principles are included in the Fingal CDP relevant to design:

Objective PM31 - *Promote excellent urban design responses to achieve high quality, sustainable urban and natural environments, which are attractive to residents, workers and visitors and are in accordance with the 12 urban design principles set out in the Urban Design Manual – A Best Practice Guide (2009).*

Objective PM32 - *Have regard to the joint Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government's Design Manual for Urban Streets and Roads (DMURS), (2013) and the National Transport Authority's Permeability Best Practice Guide (2015), in the provision of good urban design.*

10 The proposed development has taken consideration of the content of the Urban Design manual criteria and has been assessed against this above. Further detail on this has been provided by the accompanying Architectural Design Statement prepared by De Blacam Meagher, which also considers how the proposals comply with the principles set out in the Design Manual for Urban Streets and Roads (DMURS) 2013.

11 The proposed site layout seeks to minimise car use and prioritise pedestrian movement through a sensitively design landscaping scheme which restricts vehicular movement to the northern part of the site and provides only limited car parking at surface level. Shared surfaces, generously scaled footpaths and carriageways included comply with standards set out in DMURS, contributing to the sustainable development of the site which prioritises pedestrian movement.

6.4 Residential Density

12 With reference to residential density the Fingal CDP includes the following objective:

Objective PM41 - *Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.*

13 The scheme proposes higher densities due to its location close to local services and social infrastructure and its good transport links including the Maynooth railway line and Dublin Bus services. The site is also located adjacent to an NTA Cycle Route at

Carpenterstown Road, forming the northern perimeter of the site. The proposed site layout takes cognisance of the neighbouring residential developments and seeks to protect and preserve amenity through sensitive design, scale and height, whilst also retaining existing trees and woodland which mark boundaries and provide visual screening. The net density proposed is c. 108 units per ha.

- 14 The Fingal CDP states that in general, the number of dwellings to be provided on a site should be determined with reference to the Sustainable Residential Development in Urban Areas (2009) guidelines. The proposed apartment development provides a high level of residential amenity and balances this objective with the need to ensure sustainable densities are achieved on existing serviced land, in proximity to public transport.

6.5 Housing Mix

- 15 The Fingal CDP includes the following objective with regard to mix:

Objective PM38 - *Achieve an appropriate dwelling mix, size, type, tenure in all new residential developments.*

Objective PM40 - *Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.*

- 16 The proposals include a sustainable mix of apartment units which contribute to sustainable communities on the site and respond appropriately to the current market demands. As noted within the NPF, household sizes are declining at present, contributing to an increased need for smaller residential units, particularly in the form of apartments.
- 17 The proposed breakdown of units includes c 89% of the total residential accommodation as 1 and 2 no. bedroom apartments, with the remainder provided as 3 no. bedroom units. This is a suitable mix of unit type which responds appropriately to providing apartments within the wider area, where 2 storey dwellings are a significant feature.

6.6 Apartment Development

- 18 The CDP notes that Apartment developments should be of high-quality design and site layout having due regard to the character and amenities of the area. All apartment developments shall accord with or exceed all aspects of Government Guidelines in relation to residential development best practice, including 'Sustainable Urban Housing: Design Standards for New Apartments' (2007 & 2015) and 'Sustainable Residential Development in Urban Areas' (2009) and provisions of Tables 12.1, 12.2 and 12.3 - Dwelling and Apartment Standards set out in Chapter 12 Development Management Standards.

Objective PM42 - *The Guidelines for Planning Authorities 'Sustainable Urban Housing: Design Standards for New Apartments', 2015 issued by the then Minister for the Environment, Community and Local Government under Section 28 of the Planning and Development Act, 2000 (as amended) are required to be applied by the Planning Authority in carrying out its functions.*

Objective PM43 - Have regard to 'Sustainable Urban Housing: Design Standards for New Apartments' (2007)

Objective PM44 - Encourage and promote the development of underutilised infill, corner and backland sites in existing residential areas subject to the character of the area and environment being protected.

Objective PM45 - Promote the use of contemporary and innovative design solutions subject to the design respecting the character and architectural heritage of the area.

- 19 It is acknowledged that the 2015 Apartment Guidelines have been superseded by the 2018 Apartment Guidelines, as noted earlier in this statement of consistency. The accompanying Housing Quality Assessment and Schedule of Accommodation prepared by De Blacam Meagher Architects notes compliance with the size requirements set out at Appendix 1 of the 2018 Apartment Guidelines (including that the majority of the apartments exceed the minimum floor area by a minimum of 10%).
- 20 The proposals have taken cognisance of the Design Standards Guidelines and promote the development of an underutilised, brownfield infill site with an appropriately scaled residential scheme which integrates with the residential surroundings of the site whilst retaining and consolidating its woodland nature and character.

6.7 Open Space

- 21 The CDP notes the following objectives in relation to the provision of open space in new developments:

Objective PM52 - Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.

Objective PM53 - Require an equivalent financial contribution in lieu of open space provision in smaller developments where the open space generated by the development would be so small as not to be viable.

Objective PM60 - Ensure public open space is accessible and designed so that passive surveillance is provided.

Objective PM61 - Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation to include residents.

- 22 As detailed within the accompanying architectural drawings and schedule prepared by De Blacam Meagher Architects, the proposed development provides circa 5,000 sqm of open space of high-quality open space across the site along with additional ancillary landscape amenity areas of c. 2,179 sq.m. This is consolidated by c. 1,778 sqm of private open space in the form of private balconies and terraces associated within each apartment unit.
- 23 Most of the communal open space at the site is located at a central location in order to provide ease of access and ensure that the area benefits from passive surveillance from each of the residential blocks. The proposed landscaping and open space

scheme have been designed in order to consolidate the site's sylvan character through the retention of existing trees both centrally and the at the perimeters of the site, as well as the introduction of new tree lined pedestrian routes. A children's play park is also proposed, associated with the crèche at Block A.

- 24 Open space and landscaping is proposed to be of high quality and will provide variety between informal communal open spaces, passive recreation and more formal areas in which to meet and congregate. Open space on site prioritises pedestrian use and is simply navigated. The proposed landscaping scheme is detailed by the accompanying drawings and rationale prepared by Bernard Seymour Landscape Architects.

6.8 Landscape Character

- 25 The CDP notes the following objectives relative to landscape character:

Objective NH34: *Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.*

Objective NH36: *Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it:*

- *Causes unacceptable visual harm;*
- *Introduces incongruous landscape elements;*
- *Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.*

Objective NH37: *Ensure that new development meets high standards of siting and design.*

Objective NH39: *Require any necessary assessments, including visual impact assessments, to be prepared prior to approving development in highly sensitive areas.*

- 26 It is noted that the subject site is located within the River Valley and Canal Landscape Character Type which is considered to have a high landscape value and high landscape sensitivity. The proposals are accompanied by a Landscape and Visual Impact Assessment prepared by Macroworks, which analyses the likely visual appearance of the proposed development from a number of viewpoints within the surrounding environment.
- 27 As noted above, the scale and design of the development has been carefully considered to retain and utilise the existing natural woodland features at the site and optimise screening from trees, whilst incorporating additional features within the proposed landscaping scheme. The layout and siting of the buildings on site has been

carefully developed in order to preserve the amenity of adjoining residential development and respect the nature of the landscape in which the scheme is located.

- 28 It is also highlighted that there are a number of residential developments located to the south and west, located within the River Valley and Canal Landscape Character area, such as Diswellstown. As such it is considered that the introduction of a high-quality apartment scheme on a large infill site will not detract from the visual amenity of the River Valley.

- 29 We refer the Board to the enclosed LVIA prepared by Macroworks, which states that

“Overall, it is considered that the proposed development is an appropriate addition to the urban fabric of west Dublin and that it will not result in significant visual impacts in the context of the Liffey High Sensitivity Landscape designation or for receptors within its immediate context.”

6.9 Childcare Facilities

- 30 Objective PM76 requires that as part of planning applications for new residential and commercial development that provision be made for appropriate purpose-built childcare facilities where such facilities are deemed necessary by the Planning Authority.

- 31 As noted above, the proposals include a crèche which will facilitate approximately 34 no. childcare spaces. The facility will be located at the ground floor of Block A and extend to circa 174 sqm. A children’s play area will also be provided on site and the crèche, which will use the shared visitor spaces within the scheme for parking, as well as a drop off area. In this regard the proposals are considered to comply with the provisions of the CDP.

6.10 Compliance with Residential Development Policies of the Fingal County Development Plan

- 32 The proposed development of 192 no. residential units with a mix of dwelling types and sizes, in a high-quality landscaped setting, located close to quality public transport corridor and on a site, which is zoned for residential development fully accords with the overarching vision for residential development in Fingal.

Figure 6.1 – Land Use Zoning Extract

6.10.1 Relevant Policies

Table 6.1 – Evaluation of the proposed development in terms of Common Principles for all Planning Applications

Development Management Objective	Evaluation
Appropriate Assessment Screening Objective DMS01 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 European site or sites are subject to Screening for Appropriate Assessment.	The SHD application is accompanied by an Appropriate Assessment Screening Report prepared by Enviroguide. This concludes that on the basis of objective information, the possibility may be excluded that the proposed development will have a significant effect on any of the Natura 2000 sites located within County Dublin and beyond.
High Quality Urban Design Objective DMS03 Submit a detailed design statement for developments in excess of 5 residential units in urban areas.	This request is accompanied by a Design Statement prepared by De Blacam Meagher which details the rationale and design concept of the proposed development, having regard to the content of the Urban Design Manual and all relevant components of the Development Plan. The development is considered to make optimum use of a brownfield, infill site through a sensitively designed scheme which retains its woodland nature and consolidates the character and setting of the subject lands.
Green Roofs & Walls Objective DMS16 Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision.	The proposed development includes a comprehensive landscaping scheme which is fully integrated with the drainage strategy on the site. This includes SUDS features including green roofs, permeable paving, filter drains, landscaping and controlled attenuation to retain surface water release to greenfield rates.

Development Management Objective	Evaluation
<u>Objective DMS72</u> Encourage the use of green roofs as amenity space.	
Utility Facilities <u>Objective DMS18</u> Locate, where possible, new utility structures such as electricity substations and telecommunication equipment cabinets, not adjacent to or forward of the front building line of buildings or on areas of open space.	Proposed ESB substation on site is integrated appropriately within the design of the development and can be easily accessed for maintenance and servicing.

6.10.2 Residential Development

- 33 Table 6.2 sets out relevant county plan development management policies for design criteria for development and an evaluation of the proposed development.

Table 6.2 – Evaluation of the proposed development in terms of relevant Apartment Development Objectives

Development Management Policy	Evaluation
Dual Aspect <u>Objective DMS20 & DMS 21</u> Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect.	As noted within the Housing Quality Assessment and Design Statement, prepared by De Blacam & Meagher, 54% of the proposed apartment units are dual aspect. Furthermore, there are no north facing, single aspect apartments within the scheme.
Quantitative Standards <u>Objective DMS24</u> New residential units comply with or exceed minimum standards as set out by the CDP. <u>Objective DMS25</u> The majority of all apartments in schemes in excess of 100 units exceed minimum standards by a minimum of 10%.	All apartment units proposed meet or exceed the minimum standards as set out in Appendix 1 of the 2018 Apartment Guidelines which supersede the Development Plan Standards. This is detailed within the accompanying Housing Quality Assessment prepared by De Blacam & Meagher.
Separation Distances <u>Objective DMS28</u> A minimum separation distance of 22 metres between directly opposing rear first floor windows shall generally be observed. In developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.	As noted by the accompanying architectural drawings, the separation distances of at least 22 metres are proposed between residential blocks and existing adjacent dwellings. This distance increased at setback upper floor levels at each block, with 2 no. setback floors at Block C and Block D having regard to the residential development neighbouring to the south.
Daylight, Sunlight & Overshadowing <u>Objective DMS30</u> Ensure all new residential units comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and B.S. 8206 Lighting for Buildings, Part 2 2008: Code of Practice for	The accompanying Daylight, Sunlight and Shadow Analysis prepared by Geraghty Environmental Consultants notes that the proposed development complies with the recommended standards of the BRE Guidelines. This confirms that the development will protect

Daylighting or other updated relevant documents.	and preserve the amenity of adjoining land uses, in accordance with the site's zoning objective
Management Companies & Facilities <u>Objective DMS33</u> Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents. <u>Objective DMS34</u> Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council. <u>Objective DMS35</u> Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.	The proposed scheme will be professionally managed by an experienced operator which will oversee the upkeep and maintenance of all public spaces and internal amenity within the proposed scheme. Office use is included at Block A to facilitate the proper management of the scheme. It is anticipated that a private crèche operator will manage the facility at Block A. Communal facilities in the form of a gym and residential lounge room is provided on ground floor level at Block A. A play facility is located adjacent to the west of the crèche at Block A.
Refuse Storage & Bins <u>Objective DMS36</u> Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage.	Refuse facilities are included at 3 no. locations within the basement level of the proposed scheme and can be accessed by refuse collection vehicles. This is detailed further within the accompanying Operational Waste Management Plan by Byrne Environmental.
Infill Development & Character <u>Objective DMS39</u> 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. <u>Objective DMS44</u> Protect areas with a unique, identified residential character which provides a sense of place to an area through design, character, density and/or height and ensure any new development in such areas respects this distinctive character.	The proposed development is considered to constitute infill brownfield land with existing residential land use to the east, south and west. The site is characterised by the presence of trees and woodland associated with the former residential land use. The proposed landscaping strategy seeks to consolidate the natural setting and character of the site through the retention of trees and planting of a significant number of new species. The proposed development is also designed and scaled appropriately to relate and integrate with adjoining residential use.

6.10.3 Open Space

- 34 Table 6.3 sets out relevant county plan development management policies for open space and an evaluation of the proposed development in terms of each policy.

Table 6.3 – Evaluation of the proposed development in terms of relevant Open Space Objectives

Development Management Policy	Evaluation
<p>Accessibility <u>Objective DMS56</u> Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.</p>	<p>The proposed development will enhance the quantum of public open space in the local area and provide high quality communal space to the future residents of the development.</p> <p>The proposed scheme also considers a pedestrian connection to the adjoining lands to the west, subject to landowner agreement.</p> <p>An Appropriate Assessment Screening accompanies this request and concludes that the proposed development will have no impact upon Natura 2000 qualifying features in the vicinity.</p>
<p>Quantity <u>Objective DMS57</u> Require a minimum public open space provision of 2.5 hectares per 1000 population. <u>Objective DMS57A</u> Require a minimum 10% of a proposed development site area be designated for use as public open space.</p>	<p>The proposed development provides circa 0.5 hectares sqm of open space centrally within the blocks, along with additional landscape amenity areas of c. 2,179 sq.m which equates to over 41% of the total size area.</p> <p>This is complemented by c. 1,778 sqm of private open space associated with each apartment unit in the form of a balcony or terrace.</p> <p>In excess of 10% of the total site area is provided as open space. This is provided through a high-quality landscaping scheme which prioritises pedestrian movement and offers a range of passive and active open space and facilities.</p> <p>It is not intended that the development will be taken in charge by FCC.</p>
<p>Sustainable Urban Drainage Systems <u>Objective DMS73</u> Ensure as far as practical that the design of SuDS enhances the quality of open spaces. SuDS do not form part of the public open space provision, except where it contributes in a significant and positive way to the design and quality of open space.</p>	<p>The proposed development integrates SUDS elements within landscaped open space on the site in the form of filter drains, attenuation and permeable paving. This strategy retains greenfield discharge rates from the site, as detailed within the accompanying Infrastructure Design Report prepared by OCSC.</p>
<p>Playground Facilities <u>Objective DMS75</u> Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq. m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities.</p>	<p>A children's play area designated for the crèche is proposed adjacent to the west of Block A. This is complemented by a quality play area located in the centre of the scheme which benefits from passive surveillance from residential Blocks D and E.</p>
<p>Tree Policy <u>Objective DMS77</u> Protect, preserve and ensure the effective management of trees and groups of trees. <u>Objective DMS78</u> Ensure during the course of development, trees and hedgerows that are conditioned for retention</p>	<p>The proposed development incorporates the existing tree coverage at the site into the proposed landscaping scheme proposed by Bernard Seymour Landscape Architects. A Tree Survey has been prepared by Independent Tree Surveys and accompanies this request. This notes that no Category A trees are found on site,</p>

Development Management Policy	Evaluation
<p>are fully protected in accordance with 'BS5837 (2012) Trees in relation to the Design, Demolition and Construction – Recommendations' or as may be updated.</p> <p><u>Objective DMS79</u> Require the use of native planting where appropriate in new developments in consultation with the Council.</p> <p><u>Objective DMS80</u> Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.</p>	<p>with 50 Category B, 106 Category C and 9 Category U species. Trees and hedges are primarily found around perimeters. No large, old, high value specimen trees are found on site.</p> <p>It is considered that many existing trees and hedgerows on the site will be retained and included within the proposals. The development seeks to retain and consolidate the site's sylvan nature in order to benefit from visual screening and integration with the setting and character of the area.</p>
<p>Private Open Space</p> <p><u>Objective DMS84</u> Ensure trees removed from residential areas are replaced, where appropriate, as soon as resources allow.</p> <p><u>Objective DMS85</u> Ensure private open spaces for all residential unit types are not unduly overshadowed.</p>	<p>The proposed development will provide compensatory planting for the trees removed from the site. Trees removed from the site will be of poor value as identified by the tree survey and will be replaced by species of greater quality which are suitable for the subject site.</p> <p>Open space provided throughout the site will be designed sensitively as part of a comprehensive, high quality landscaping scheme which will ensure all spaces receive adequate levels of daylight and sunlight.</p>
<p>Apartment Units</p> <p><u>Objective DMS89</u> Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 12.6.</p> <p><u>Objective DMS90</u> Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.</p> <p><u>Objective DMS91</u> Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 12.6.</p> <p><u>Objective DMS92</u> Permit in appropriate layouts (e.g. courtyard layouts) the provision of a combination of private and semi-private open spaces.</p>	<p>As noted above, private, semi-private and communal open space is provided throughout the proposed development in accordance with CDP standards as well as those within Appendix 1 of the 2018 Apartment Guidelines.</p>

6.10.4 Movement and Infrastructure

- 35 Table 6.4 sets out relevant county plan development management policies for transport and an evaluation of the proposed development in terms of each policy.

Table 6.4 – Evaluation of the proposed development in terms of Transportation Objectives

Development Management Policy	Evaluation
<p>Car & Bicycle Parking Standards Car Parking Standards are provided in Table 12.8 of the CDP.</p> <p>Bicycle Parking Standards are provided in Table 12.9 of the CDP.</p>	<p>The subject site is located within 'Zone 1' which refers to areas within 800m of a QBC or 1600m of a rail station.</p> <p>It is proposed to provide 240 no. car parking spaces at the proposed development. This includes 48 no. visitors spaces. Car parking will be provided primarily at basement level, with vehicular parking minimised at surface level.</p> <p>It is proposed to provide 352 no. bicycle parking spaces. This will encourage bicycle use as an alternative mode of transport to the private car. Cycle parking will be prioritised at surface level.</p> <p>Car and bicycle parking levels are considered justifiable and appropriate in the context of the site's proximity to Dublin Bus services and the rail station at Coolmine which provide high quality, frequent public transport links.</p>

6.10.5 Infrastructure & Utilities

- 36 Table 6.5 sets out relevant county plan development management policies for infrastructure and utilities and an evaluation of the proposed development in terms of each policy.

Table 6.5 – Evaluation of the proposed development in terms of Infrastructure & Utilities Objectives

Development Management Policy	Evaluation
<p>Water & Drainage Objective DMS133 Ensure that all developments comply with the requirements of the Council and with the principles of sustainable development. Best management practices, as identified by the Council, shall be implemented.</p>	<p>This request is accompanied by an Infrastructure Design Report and Engineering Drawings prepared by OCSC Consulting Engineers which detail the strategy water supply, foul and surface water drainage from the site.</p> <p>Irish Water have been consulted prior to the submission of this request and have issued a Confirmation of Feasibility which notes that a connection to the water network can be provided from the site. This is enclosed.</p> <p>It is proposed to connect to existing and recently implemented foul and surface water sewers located on Carpenterstown Road, immediately adjoining the site to the north. Water supply can also be obtained this location.</p>

Development Management Policy	Evaluation
<p>Waste Management</p> <p><u>Objective DMS146</u> Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.</p> <p><u>Objective DMS147</u> Ensure all new developments include well designed facilities to accommodate the three bin collection system.</p> <p><u>Objective DMS148</u> Ensure all new developments make provision for bring bank facilities where appropriate.</p> <p><u>Objective DMS149</u> Require that construction and demolition waste management plans be submitted as part of any planning application for projects in excess of any of the following thresholds:</p> <ul style="list-style-type: none"> • New residential development of 10 units or more. • New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250sqm. • Demolition / renovation / refurbishment projects generating in excess of 100m3 in volume of C&D waste. • Civil engineering projects in excess of 500m3 of waste materials used for development of works on the site. 	<p>The proposals include appropriate waste management facilities in compliance with the content of the CDP.</p> <p>The waste management strategy for the site is detailed within the accompanying Construction & Demolition Waste Management Plan and Operational Waste Management Plan prepared by Byrne Environmental.</p>

6.10.6 Archaeology & Architectural Heritage

- 37 Table 5.6 sets out relevant county plan development management policies for archaeological and architectural heritage and an evaluation of the proposed development in terms of each policy. An Archaeological report prepared by IAC is included with the SHD application.

Table 6.6 – Evaluation of the proposed development in terms of Archaeology & Architectural Heritage Objectives

Development Management Policy	Evaluation
<p>Site Assessment</p> <p><u>Objective DMS152</u> A site assessment should be carried out prior to starting any design work to help inform and direct the layout, form and architectural treatment of the proposed development and identify issues that may need to be avoided, mitigated or require sensitive design and professional expertise. The site assessment should evaluate:</p>	<p>An Archaeological Impact Assessment prepared by IAC accompanies this request. This report concludes that No previously unrecorded features of archaeological potential were noted during the course of the field inspection.</p> <p>The mature hedge line that borders the road and the northern side of the proposed development area is not the path of the townland boundary. The hedge line is likely to be post medieval in origin with the path of same marked within the historic OS maps.</p>

Development Management Policy	Evaluation
<ul style="list-style-type: none"> • Character of the site in its setting (including existing buildings), • Access to the site, • Services, • Protected Designations, • Rare and protected species (such as bats). <p><u>Objective DMS153</u> All development proposals that may (due to their location, size, or nature) have implications for archaeological heritage shall be accompanied by an Archaeological Impact Assessment and Method Statement.</p>	

6.10.7 Natural Heritage

38 Table 6.7 sets out relevant county plan development management policies for archaeological and architectural heritage and an evaluation of the proposed development in terms of each policy.

Table 6.7 – Evaluation of the proposed development in terms of Natural Heritage Objectives

Development Management Policy	Evaluation
<p>Biodiversity <u>Objective DMS162</u> Ensure all development proposals include measures to protect and enhance biodiversity. <u>Objective DMS163</u> Ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County which, individually, or in combination with other plans and projects, are likely to have a significant direct or indirect impact on any European site or sites.</p>	<p>An Appropriate Assessment Screening Report has been prepared by Enviroguide in support of this SHD application which found that significant effects are not likely to arise, either alone or in combination with other plans or projects that will result in significant effects to the integrity of the Natura 2000 network.</p>

7.0 PART V

- 1 Section 2.10 of the CDP states that Social housing and homelessness are amongst the greatest challenges to be addressed by the Council in the current plan period. The applicant agrees to accept a condition on a grant of planning permission which requires the applicant to enter into a Part V agreement with Fingal County Council as per their requirements prior to the commencement of development.
- 2 The applicant's Part V proposals are described and mapped in the Part V material accompanying this consultation request. Glenveagh propose to allocate 20 no. dwellings within Block D.

8.0 CONCLUSIONS

- 1 The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. At a national and regional level, this statement has demonstrated the consistency of the development with the following:
 - National Planning Framework;
 - Regional Economic and Spatial Strategy for the East and Midlands Region 2018;
 - Fingal Development Plan 2017-2023;
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
 - Guidelines for Planning Authorities on Urban Design Standards for New Apartments (2018);
 - Guidelines for Planning Authorities Urban Development and Building Height Guidelines (December 2018);
 - Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - The Planning System and Flood Risk Management (2009);
 - Draft Water Services Guidelines for Planning Authorities (2018);
- 2 Consistency is also demonstrated with the policies and provisions of the Fingal County Development Plan 2017-2023 which is the key planning policy documents at a local level.
- 3 It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development comprising residential, open space, and a creche on the subject lands.
- 4 The proposed development and accompanying documentation and reports have been prepared following pre-planning consultation with Fingal County Council which forms a part of this SHD application.
- 5 In conclusion, it is respectfully submitted that the proposed development is consistent with and in accordance with the proper planning and sustainable development of the area, and complies with all relevant national, regional and local planning policies and guidelines and that the proposal as presented should be granted permission.

APPENDIX 1 SECTION 247 MEETINGS – FINGAL CO. CO.

A.1 The following sets out then main discussions in respect of the S.247 meetings held on the 10th of January 2019, and the 28th of February 2019 with Fingal Co. Co.

A.2 The main issues discussed related to:

- Site Layout (Density, separation distances);
- Tree Survey;
- Tree Retention along Boundary;
- Residential Amenity of Future Occupants;
- CDP Landscape Designation.

Site Layout (Density, separation distances)

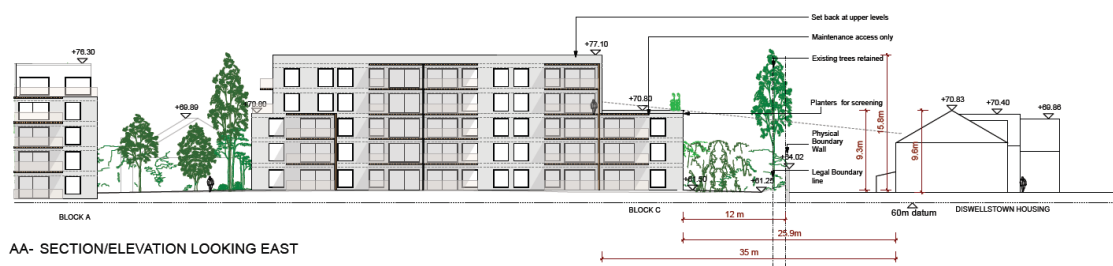
A.3 With reference to the site layout, FCC were of the view that the proposed density at 112 (based on 200 units) was on the high side for the subject site.

A.4 In response, it is considered that the proposed density which is 108, is appropriate having regard to the location of the site within c. 1km of Coolmine train station and also in proximity to a Dublin Bus route (c. 340m). The wider area is characterised by relatively low density (e.g. Diswellstown to the south, and Cottonwood and Park Manor to the north. We would note that Bracken Park, located to the east of the development includes an apartment block of 4 storeys.

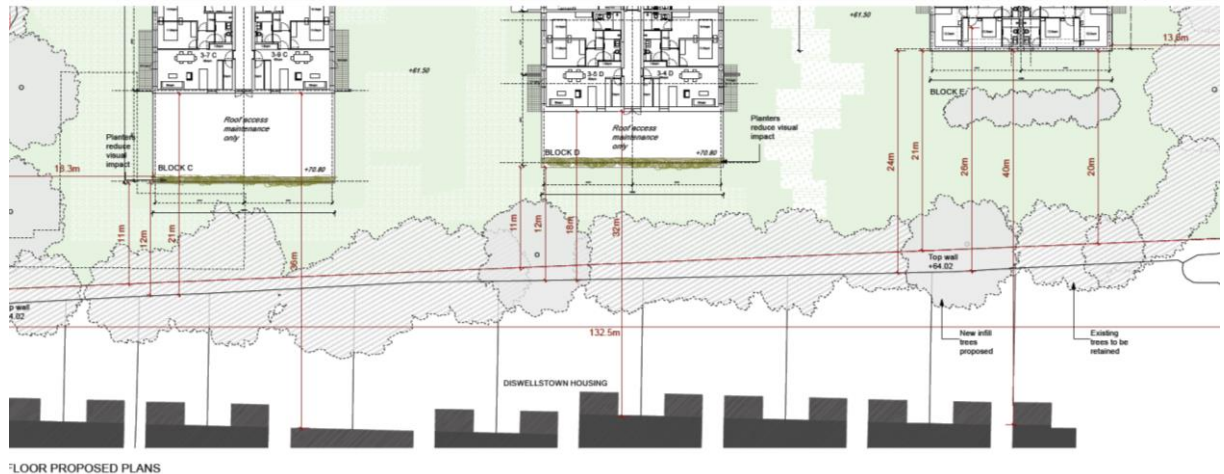
A.5 The subject lands currently comprise a single dwelling on a site of c. 1.77 hectares, which is clearly not a sustainable density, having regard to the subject site's location within the metropolitan area of Dublin and also in proximity to the Maynooth suburban railway line (c. 1km from Coolmine station). It is one of the small opportunity sites within the catchment of Coolmine rail station and will provide for a sustainable density which will support the substantial investment in public transport which includes the electrification of the Maynooth rail line.

A.6 In relation to separation distances, the scheme was amended in response to the meetings and the separation distances to the south and east were increased. The scheme steps down to 3 storeys along the southern boundary and the 5 no. storey element is located c. 36 m from Block C, c. 32 m from Block D, and 40m from Block E, to the rear of the houses in Diswellstown. To the east, the entrance to the basement was moved from the eastern boundary towards the centre of the site so as to retain the trees along the boundary. The separation distance from the eastern boundary was increased to 13.6m.

Figure 1A Southern Boundary Section Looking East



Source: DeBlacam & Meagher Architects

Figure 2A Southern Boundary Plan

Source: DeBlacam & Meagher Architects

- A.7 In response to commentary from Fingal the scheme included further set-backs to blocks C, D and E provided along the eastern boundary and internal setbacks to central garden space, thus ensuring better residential amenity and preventing over-looking into neighbouring properties whilst ensuring good daylight levels within proposed apartments.
- A.8 Further set-backs were added to Blocks C and D on southern boundary with removal of 4 units from the scheme. The Distances to physical boundary are between 12m and 23.6 metres on southern blocks. The distance to the 2nd floor façade in Blocks C, D and E is 36m, 32m and 42m respectively.
- A.9 Southern roof terraces in blocks C and D are for maintenance access only. Planters soften the edge of buildings and provide further screening for the benefit of the Diswellstown housing to the south.

Tree Survey

- A.10 The Planning Authority requested tree survey information, while noting that the site wasn't covered by the tree protection designation (which relates to the lands to the east). Tree survey information has been collated and incorporated into the site plan with a reduction in the number of trees proposed for removal. Root protection areas have been shown as well as proposed infill trees to enhance screening, clarification of separation distances and existing physical boundaries on site and the working area required for the construction of each block indicated.
- A.11 A summary of changes is provided as follows:

Tree Retention along Boundary

- A.12 The location of the basement ramp at the eastern boundary was moved to new location in the centre of the site for the following reasons; maintain the trees and mature screening to the eastern boundary; ensure a more compact scheme which allows for the provision of future expansion to the east and west from within the site.
- A.13 In addition, the scheme was amended to include an alteration of the basement line to maintain trees along the southern and eastern boundaries and mitigate the need for piling on site.

Residential Amenity of Future Occupants

A.14 The proposed development will provide a high-quality housing scheme which is demonstrated in the HQA prepared by DeBlacam and Meagher Architects, which notes:

- Numbers of dual aspect apartments has increased to 54% of scheme.
- There are no north facing single aspect apartments in the scheme.
- The majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10%.
- All apartments meet or exceed the 10% over the minimum for private amenity space set out in the Apartment Guidelines
- Removal of ground floor projecting lobbies on L-shaped blocks to allow for more compact design and more circulation around perimeter of buildings.

CDP Landscape Designation

With reference to the location of the site within the northern fringe of the River Liffey Valley and Canal Landscape Character Type, Macroworks has undertaken a LVIA review of the site. A LVIA is included with the SHD application.