

# Statement of Consistency

For a proposed Residential Development at Stepside, Co. Dublin.

on behalf of McGarrell Reilly Homes Ltd.

July 2022



McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS

# Document Control Sheet

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# 1. Introduction

This Statement of Consistency (SoC) has been prepared by McCutcheon Halley (MH Planning) Chartered Planning Consultants with input from the appointed Design Team as detailed in the Planning Report that is submitted with this application under separate cover. The Planning Report provides a detailed assessment of how the proposed development is consistent with the key planning policies and objectives presented in the Dun Laoghaire-Rathdown County Development Plan 2022-2028.

For details of consistency with the quantitative standards for residential units please refer to the **Housing Quality Assessment** and the **Architectural Design Report** (CCK Architects) that accompany this application under separate cover.

## 1.1 Purpose of this Report

The purpose of this SoC is to assess the consistency of the proposed development with the relevant planning policy at both national and regional levels as well as relevant guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended). This SoC addresses the following policy and guidelines;

National Planning Policy	Section
Project Ireland 2040: National Planning Framework (2018)	3.1
Housing for All – A new Housing Plan for Ireland (2021)	3.2
Section 28 Ministerial Guidelines	
Sustainable Urban Housing: Design Standards for New Apartments (2020)	4.1
Urban Development and Building Heights: Guidelines for Planning Authorities (2018)	4.2
Design Manual for Urban Roads and Streets (2013)	4.3
Sustainable Residential Development in Urban Areas (2009)	4.4
Urban Design Manual – A Best Practice Guide (2009)	4.5
Childcare Facilities Guidelines for Planning Authorities (2001)	4.6
Regional Planning Policy	
Eastern & Midland Regional Spatial & Economic Strategy 2019-2031	5.1

**Table 1** - Summary of Planning Policy assessed as part of this SoC

This SoC should be read in conjunction with the submitted **Planning Statement** (MH Planning) accompanying this application. The Planning Statement demonstrates that the proposed development has been prepared in accordance with the relevant policies and objectives set out in the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (the Development Plan).

## 2. Proposed Development

### 2.1 Development Description

The design rationale is to create and deliver a connected, high quality sustainable residential development that is sensitive to its context with its own character and sense of place, and that maximises the site's natural attributes while achieving maximum efficiency of the existing and proposed infrastructure. The proposed site layout is illustrated in **Drawing No. 1806-SHD-104** that accompanies this application.

McGarrell Reilly Homes Limited, intend to apply to An Bord Pleanála for permission for a Strategic Housing Development comprising 118 no. residential units with a cumulative gross floor area (GFA) of 11,817 sq.m at this site of c. 1.97 hectares located to the north-east of Stepside Park in Stepside, Co. Dublin.

The proposed development comprises a total of 118 no. residential units on a 1.97 ha site and will consist of:

- i. the construction of 1 no. apartment block ranging from 3 to 6-storeys in height (9,193 sq.m GFA), comprising a total of 97 no. units including 28 no. 1-bedroom and 69 no. 2-bedroom apartments, all with private amenity space;
- ii. construction of 21 no. 2-storey houses in semi-detached and terraced form (combined GFA of 2,624 sq.m), including 10 no. 3-bedroom dwellings and 11 no. 4-bedroom dwellings, all with private amenity space;
- iii. construction of a 2-storey childcare facility (156 sq.m GFA), with associated outdoor play area, 2 no. set-down car-parking spaces and 2 no. designated staff car-parking spaces;
- iv. construction of a section of the Clay Farm Loop Road 137m in length (all on lands within the ownership of the applicant) and incorporating a 6m wide carriageway with 2m wide footpaths and 2m wide cycle tracks on each side, connecting with the existing section of the loop road constructed on lands to the south-east as part of the Clay Farm development;
- v. construction of local access roads to serve the development which will connect with the new section of the Clay Farm Loop Road;
- vi. provision of 4,002 sq.m of public open space;

- vii. provision of 1,454 sq.m of communal open space at podium level to serve residents of the apartment block;
- viii. provision of 153 no. on-site car parking spaces incorporating 97 no. under podium spaces for residents of the apartment building, 10 no. visitor car-parking spaces, 42 no. in-curtilage car parking spaces for the housing units and 4 no. car-parking spaces designated for the childcare facility;
- ix. provision of 248 no. bicycle parking spaces including 170 no. long-stay spaces, 56 no. short-stay spaces and 22 no. for use by the childcare facility;
- x. 4 no. motor-cycle parking spaces under podium level;
- xi. provision of 4 no. new pedestrian and cyclist links to adjoining residential development in Stepside Park, one of which will also facilitate emergency vehicle access to Stepside Park and access to re-configured bin-store for existing residents of The Courtyard;
- xii. all ancillary site development works including plant, waste storage areas, landscaping, green roofs, boundary treatments, SuDS measures, ESB substation, public lighting and solar PV panels.

Further details are provided in the **Planning Statement** (MH Planning) that is submitted with this application under separate cover.

The total number and mix of units to be provided on site is set out in the Table below.

Building	1 Bed	2 Bed	3 Bed	4 Bed	Total	%
Apartment	28	-	-	-	28	23.7
Apartment	-	69	-	-	69	58.5
House	-	-	10	-	10	8.5
House	-	-	-	11	11	9.3
<b>Total</b>	<b>28</b>	<b>69</b>	<b>10</b>	<b>11</b>	<b>118</b>	<b>100</b>

Table 2 Mix of Units (Houses & Apartments)

The development proposal provides for the construction of a 137m section of the Clay Farm Loop Road. Delivery of this section will facilitate vehicular access to the site via the Clay Farm / Ballyogan Road / Leopardstown Valley junction. Further extension of the loop road through the application site will deliver a vital piece of enabling infrastructure which will contribute to unlocking the development potential of the wider zoned lands in Kilgobbin South. Extension of the Loop Road from Clay Farm Phase 2 will also support enhanced permeability for pedestrians and cyclists throughout the wider area, create pedestrian and cyclist connectivity to Ballyogan Road and facilitate easy access to the Luas Greenline stops for residents at Stepside Park and Stepside Village.

The proposed development will ensure the efficient use of these strategically located and serviced lands within Dublin City and Suburbs, achieving a net density of 79 units per hectare (uph).

A comprehensive landscape scheme that is informed by the vision for the proposed development has been generated, to create a connected, high quality sustainable residential development that is sensitive to its context, while creating its own character and sense of place. The landscape approach is to reinforce this larger development vision by capitalising on the existing natural features and character of the site, creating accessible open spaces that are connected to new and existing residential neighbourhoods. The rationale is to maximise the sense of community, opportunities for interactions and engagement with the locality.

Throughout the scheme a clear hierarchy of attractive and usable open spaces have been incorporated which have been designed to respond to the needs of the residents. These vary in size, scale, and programme such as a natural children's play area, open flexible space for residents to gather underpinned by the need to promote biodiversity and sustainable practices. Communal amenity space is provided at podium level ensuring it will be readily accessible by all residents of the apartment block and will benefit from overlooking. Public open space is distributed across 3 no. high-quality areas, which will serve both future occupants of the apartments and houses within the proposed development.

The subject site will discharge via gravity to the existing foul network which traverses the site and serves the existing Stepside Park development. Due to the design of the overall development, certain sections of the existing network will need to be diverted and this is confirmed as acceptable by Irish Water. Individual houses will connect to the 150/225mm diameter foul drains via individual 100mmdiameter house connections. Foul wastewater discharge from the development will be as follows; Daily Loading – 0.68l/s.

Sustainable Urban Drainage Systems (SuDS) measures are incorporated into the surface water management system. These include permeable paving, swales, rain gardens, green roofs, green podium, above ground detention/infiltration basin and underground storage.

A total of 153 no. car parking spaces have been provided to serve residents, visitors and the crèche, compliant with County Development Plan standards.

Bicycle parking is in accordance with Dún Laoghaire-Rathdown standards and includes 248 no. spaces for both short-stay and long-stay. The proposed development will operate under a Management Company, and they will undertake regular audits to ensure that the cycle parking provision is meeting demand following occupation of the scheme.

The Childcare Assessment that accompanies this application confirms that the crèche is capable of accommodating 27 no. children. It is anticipated that its primary use will be by future occupants of the scheme, but it will be able to accommodate children from outside the development if required.

### 3. National Planning Policy

#### 3.1 Project Ireland 2040: National Planning Framework (2018)

National Policy Objective (NPO)	Compliance of the Proposed Development
<p><i>2a - A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.</i></p>	<p>The development lands are comprised of 1.97 hectares, are on serviceable lands in an area earmarked for residential development in close proximity to existing public transport infrastructure.</p> <p>The subject lands are located to the north-east of the existing residential area of Stepside Park, in close proximity to Stepside Village (c.400 metres) and to the west of Clay Farm. The development lands are c.11 km south of Dublin City Centre and are located within the boundary of Dublin City and Suburbs and the Dublin Metropolitan Area (DMA), as identified in the RSES/MASP.</p> <p>Therefore, the proposed residential development will support the consolidated growth of Dublin City and is consistent with this objective.</p>
<p><i>3a - Deliver at least 40% of all new homes nationally, within the built-up envelop of existing urban settlements.</i></p>	<p>The development site is a greenfield site and is situated adjacent to existing residential developments at Stepside Park that are comprised of houses and apartment units and Clay Farm (Phase 2) that is currently under construction.</p> <p>The development of these lands for residential use will contribute towards the delivery of 21 no. houses and 97 no. apartment units in accordance with the NPF's objective of compact growth, densification, and consolidation of the built urban form.</p>
<p><i>3b - Deliver at least half (50%) of all new homes that are targeted in the</i></p>	<p>See response NPO 3a above.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<p><i>five Cities and suburbs of Dublin, Cork, Limerick, Galway, and Waterford, within their existing built-up footprints.</i></p>	
<p><b>4</b> - <i>Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high-quality of life and well-being.</i></p>	<p>The proposed development will create an attractive and vibrant residential development that will successfully integrate with its surrounding environment.</p> <p>The proposed development aims to optimise density, provide attractive high quality open spaces and respond to the character of established housing in the adjoining Stepside Park estate, ensuring effective integration with the receiving context and emerging development trends in the area. It will improve pedestrian and cyclist permeability and connectivity through the site and wider area.</p> <p>The proposed layout will allow for the creation of links to the permitted Clay Farm residential development to the east of the site, improving connectivity for existing communities at Stepside Village and Stepside Park to existing Luas Green Line and Dublin Bus services on the Ballyogan Road.</p> <p>The proposed design and layout have been carefully considered to create a high-quality residential environment that results in adequate pedestrian permeability and enhanced cyclist connectivity throughout the local area.</p> <p>The application is accompanied by an <b>Architectural Design Report</b> (CCK Architects), a <b>Landscape Report</b> (BRR Landscape Architects) and associated drawings that demonstrate how the proposed development will successfully integrate with the surrounding area.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<p><i>6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</i></p>	<p>The subject lands are currently vacant and greenfield.</p> <p>The development of these lands will substantially enhance permeability. It will create connections to adjacent residential properties and allow for future links as lands to the north are developed. Thus, it will allow for the creation of connections to neighbouring residential communities (i.e., Stepside Park, Clay Farm Phase 2) through construction of that section of the Clay Farm Loop Road located within the application site.</p> <p>The extension of the loop road will create direct vehicular access, cyclist, and pedestrian connectivity routes to the Ballyogan Road.</p> <p>The delivery of a medium-higher density residential scheme will reinforce the residential character of this area, improve legibility and provide for enhanced pedestrian and cycle connections throughout the wider area.</p>
<p><i>7- Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:</i></p> <ul style="list-style-type: none"> <li>o <i>Dublin;</i></li> <li>o <i>Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;</i></li> <li>o <i>Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;</i></li> </ul>	<p>It is evident that this area is in a period of transition, with changes in densities and building height evident in the immediate and surrounding localities. The development of these lands in the manner proposed is consistent with ongoing development trends in the locality.</p> <p>The proposed scheme has been informed by the surrounding built environment, including the established community at Stepside Park and the need to integrate successfully with new higher-density development at Clay Farm. Thus, the proposed layout provides for a sensitive transition from smaller scale to more dense typologies.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>○ <i>In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.</i></li> </ul>	<p>The proposed development is in an area designated for residential development with access to existing public transport services (i.e., Dublin Bus routes and proximate to Luas Stops) and planned public transport infrastructure that includes Bus Connects enhancements along the Enniskerry Road.</p> <p>The development site's location is proximate to Ballyogan Road and Enniskerry Road. The further extension of the Clay Farm Loop Road will advance delivery of this important enabling infrastructure, facilitating future development of the zoned lands to the north, consistent with the growth strategy for the region.</p>
<p><b>11-</b> <i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i></p>	<p>This scheme seeks permission for 118 no. units and will provide for a net density of 79 units/ha on vacant greenfield lands proximate to high-capacity, high-frequency public transport that provides connections to major employment centres. It is estimated that the proposed development will increase the local population by c. 304 people.</p>
<p><b>13 -</b> <i>In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.</i></p>	<p>The proposed residential development ranges in height from 2 storey houses to a maximum height of 6-storeys in the apartment block.</p> <p>The proposed dwellings are situated in the southern part of the site and will comprise 2 storey detached, semi-detached, and terraced houses.</p> <p>The proposed apartment block incorporates a stepped approach to building heights and massing down towards the exposed rear garden boundaries of the existing adjacent Stepside Park houses to the rear of the building, closing it off to form a perimeter block.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
	<p>The proposed heights are consistent with emerging trends for development in the area to ensure consolidation of the urban footprint and efficient use of land.</p> <p>Permitted Clay Farm developments to the east of the lands provide an established context for increased building heights at this location. It is evident that the area is in a period of transition with changes in height from 1-2 storeys to taller buildings with higher elements typically located adjacent to major roads.</p> <p>The proposed density across the scheme is 79 uph and this is considered appropriate for this site, having regard to its location within Dublin City and suburbs and its proximity to the Luas Greenline corridor.</p> <p>This application is supported by a comprehensive suite of supporting documents assessing the development against performance-based criteria.</p> <p>A comprehensive Daylight, Sunlight and Overshadowing analysis was carried out for the proposed development. The study includes an assessment of the daylight and sunlight in line with the latest European standard EN17037 and the recently published BR209 BRE Guidance Document based on the British interpretation of this standard found in the National Annex of BS EN17037.</p> <p>A sunlight availability analysis was carried out for the proposed development. The results show that all eligible kitchen/living room windows that face within 90° of due south achieve the BRE minimum recommended sunlight availability</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
	<p>level of 1.5 hours on the design day (March 21st).</p> <p>The gardens of the neighbouring properties were also assessed for sunlight availability. These areas largely receive sufficient levels of sunlight in line with the BRE guidance, achieving 2 hours of sunlight over the vast majority of their total areas on the design day.</p> <p>The results show that 100% of bedrooms and kitchen/living/dining areas within the proposed development meet the daylight requirements set out in both the previous BR209 guidance document (based on BS8206) and the latest BR209 guidance document (based on the national annex within BS EN17037). Further analysis was carried out to show that 99.62% of these spaces achieve the minimum recommended level of daylight according to the new European standard EN17037. Of all the rooms assessed for daylight, every space assessed meets the daylight requirements of BR209:2011 (recently updated BRE Guide), BR209:2022 (latest BRE Guide), EN17037 and BS EN17037 with the exception of one room.</p> <p>Refer to the accompanying Daylight Sunlight &amp; Overshadowing Analysis prepared by Passive Dynamics for full details.</p> <p>The proposed level of car parking provision is at a rate of 1 no. space per apartment and 2 no. spaces per house. The <b>Traffic and Transport Assessment &amp; Framework Mobility Management Plan</b> prepared by DBFL Engineers and submitted under separate cover provides full details of the car, motorcycle and cycling parking provision.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<p><b>27</b> - <i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages</i></p>	<p>The proposed design will provide high levels of permeability through the site, generating increased pedestrian and cyclist activity and resulting in safer streets and public realm areas from increased passive surveillance.</p> <p>The proposal provides 248 no. bicycle parking spaces including 170 no. long-stay spaces, 56 no. short-stay visitor spaces and 22 no. for use by the childcare facility.</p> <p>Permeability is central to the design approach, and in this regard, the proposed development will ensure pedestrians are given priority within the internal site layout.</p> <p>Within the lower site, provision will be made for pedestrian and cyclist access onto the proposed section of the Clay Farm Loop Road running across the site, and a new pedestrian/cyclist link connecting to the existing Stepside Park Estate to the south.</p> <p>Further details are provided in the Traffic and Transport Assessment submitted under separate cover.</p>
<p><b>28</b> - <i>Plan for more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.</i></p>	<p>The proposed development will provide for 1, 2, 3 and 4-bedroom units distributed across 21 no. houses and 97 no. apartments. This mix of units will appeal to a variety of people with different housing needs and will accommodate a range of household sizes.</p> <p>The Applicant will comply with their Part V obligations as addressed in the Planning Statement. A Part V Proposal is submitted with this application under separate cover.</p> <p>Public Open Space and communal open spaces are provided for as part of the application. These spaces will provide opportunities for social integration. Please refer to the</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
	<p><b>Architectural Design Report</b> (CCK Architects), <b>Landscape Report</b> (BRR Landscape Architects), and associated drawings for further details.</p> <p>The proposed development is also compliant with Part M as detailed in the documentation submitted with this application.</p>
<p><b>31</b> - <i>Prioritise the alignment of targeted and planned population and employment growth with investment in:</i></p> <p><i>The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</i></p>	<p>This application is accompanied by a <b>Childcare Assessment Report</b> (MH Planning) that is submitted under separate cover. The report demonstrates that the provision of a childcare facility, as part of the proposed development, that will accommodate 27 no. children (c.156sq.m) is sufficient to accommodate the demand likely to be generated by the proposed development.</p> <p>A <b>Social Infrastructure Audit</b> (MH Planning) is also submitted under separate cover. The report concludes that there is sufficient existing social infrastructure in place to cater for the proposed development.</p>
<p><b>32</b> - <i>Target the delivery of 550,000 additional households up to 2040.</i></p>	<p>The proposed residential development will facilitate the construction of 118 no. units in the form of 21 no. houses and 97 no. apartment units and will contribute to the achievement of the target 550,000 additional housing units by 2040.</p>
<p><b>33</b> - <i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location</i></p>	<p>The proposed development will facilitate the construction of 118 no. units zoned and serviced lands near public transport infrastructure, employment centres and adjacent to the established residential areas of Stepside Park and Stepside Village.</p> <p>The proposed development will also enable the scheme to successfully integrate with existing residential developments in the surrounding area.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<p><i>34 - Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.</i></p>	<p>The proposed development will provide a mix of unit types and sizes.</p> <p>The proposed development is designed with a Universal Design Approach, i.e., so that they can be readily accessed and used by people with a variety of needs and requirements, regardless of age, size ability.</p> <p>The proposed development is compliant with the requirements of Part M.</p>
<p><i>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.</i></p>	<p>The proposed development achieves a net density of 79 uph.</p> <p>The design incorporates increased building heights of up to 6-storeys within the apartment block.</p> <p>In contrast, two-storey housing units are proposed in the south which will integrate with the built character of the adjoining development in Stepside Park.</p>
<p><i>52 - The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.</i></p>	<p>The proposed development is designed to the Nearly Zero Energy Building (NZEB) standard at a high level of energy efficiency, minimising the use of natural resources. NZEB compliant buildings generally achieve a BER of A2-A3.</p> <p>This application is accompanied by an <b>Environmental Impact Assessment Screening Report</b> (MH Planning) and concludes that the proposed development is suitable for this location and does not negatively impact on the environment.</p> <p>The landscape strategy incorporates SuDS and biodiversity measures.</p> <p>A <b>Site-Specific Flood Risk Assessment</b> (DBFL Engineers)</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
	<p>accompanies the application and confirms the site's suitability for the proposal.</p> <p>Irish Water have confirmed the scheme's feasibility in terms of potable water supply and foul water discharge.</p> <p>A Confirmation of Feasibility and Statement of Design Acceptance issued by Irish Water are submitted with this application, appended to the <b>Infrastructure Design Report</b> (DBFL Engineers).</p>
<p><i>54- Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.</i></p>	<p>The proposed development is designed to be Nearly Zero Energy Building (NZEB).</p> <p>The drainage system includes an allowance for climate change and SuDS in the form of permeable paving, swales, raingardens, pedestrian/green links to drain, underground storage, above ground detention / infiltration basin, petrol interceptor and hydro brake flow control. See <b>Infrastructure Design Report</b> for further details.</p>
<p><i>56 - Sustainably manage waste generation, invest in different types of waste treatment, and support circular economy principles, prioritising prevention, reuse, recycling, and recovery, to support a healthy environment, economy, and society.</i></p>	<p>The proposed development will incorporate adequately sized waste management facilities, which will promote source segregation of waste streams, i.e., organics, recyclable, and residual waste.</p>
<p><i>57 - Enhance water quality and resource management by:</i></p> <ul style="list-style-type: none"> <li>o <i>Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;</i></li> </ul>	<p>A <b>Site-Specific Flood Risk Assessment</b> (DBFL Engineers) accompanies this application. The proposed development is located in Flood Zone C and is not affected by fluvial flood. <b>Thus, it is suitable for residential development.</b></p> <p>An <b>Infrastructure Design Report</b> (DBFL Engineers) accompanies this application and should be referenced</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>o <i>Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process;</i></li> <li>o <i>Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), nonporous surfacing and green roofs, to create safe places.</i></li> </ul>	<p>for a comprehensive description of the proposed surface water, foul water, and water supply strategies.</p>
<p><b>63</b> - <i>Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</i></p>	<p>Sustainable Urban Drainage System (SuDS) measures are incorporated as appropriate into the proposed design.</p> <p>Full details are contained within the <b>Infrastructure Design Report</b> (DBFL Engineers) submitted under separate cover.</p>
<p><b>64</b> - <i>Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.</i></p>	<p>248 no. bicycle parking spaces are proposed throughout the scheme including 170 no. long-stay spaces, 56 no. short-stay spaces and 22 no. for use by the childcare facility.</p> <p>The cycle parking provision will serve to promote a modal shift in transport and a reduction in emissions. The proposed development includes the provision of pedestrian and cyclist links which will create direct routes to existing public transport services at Ballyogan Road to the east and Enniskerry Road to the west.</p> <p>Full details of the cycle parking proposal are contained within the <b>Traffic and Transport Assessment &amp; Framework Mobility Management Plan</b> prepared by DBFL Consulting Engineers and submitted with this application under separate cover.</p>

National Policy Objective (NPO)	Compliance of the Proposed Development
	The proposed development is designed to NZEB and will achieve a high level of energy efficiency through minimising the use of fossil fuels and associated emissions to air.
<i>75 - Ensure that all plans, projects, and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including S.E.A., E.I.A. and A.A. as appropriate.</i>	An <b>Environmental Impact Assessment Screening Report</b> (MH Planning) and <b>AA Screening Report</b> (Altemar) are submitted with this application and conclude the proposed development will not negatively impact its receiving environment or Designated European Sites.

**Table 3** - Compliance of proposed development with NPF's NPOs (2018).

### 3.2 Housing for All – A new Housing Plan for Ireland (2021)

'Housing for All – A new Housing Plan for Ireland' (2021) is a new plan enacted in September 2021 which aims to address some of the key issues surrounding housing, namely cost and supply. The Plan targets State investment of €20 billion and the provision of an additional 300,000 housing units by 2030. The Plan sets out four pathways to achieving these targets, three of which are relevant to the proposed development and are addressed below.

Pathway	Relevant Aims / Targets / Policies	Compliance of the Proposed Development
<b>Pathway 1: Pathway to Supporting Home Ownership &amp; Increasing Affordability.</b>	<p><b>Housing Policy Objective (HPO) 1 – Enable Homeownership and Increase Affordability</b></p> <ul style="list-style-type: none"> <li>1.1 - Provide an average of 6,000 affordable homes each year.</li> <li>1.8 - Expand Part V requirements to increase the percentage contribution from 10% to 20% and apply to affordable as well as social housing.</li> </ul>	<p>Social and affordable accommodation will form part of the proposed scheme.</p> <p>The composition of the proposed social and affordable units is as follows:</p> <ul style="list-style-type: none"> <li>12 no. apartments including; <ul style="list-style-type: none"> <li>5 x 1-bedroom (2 person) units – 33%</li> <li>7 x 2-bedroom (4 person) units - 47%</li> </ul> </li> <li>3 no. 3-bedroom houses (4 person) units – 20%</li> </ul>

Pathway	Relevant Aims / Targets / Policies	Compliance of the Proposed Development
	<ul style="list-style-type: none"> <li>1.9 - Ensure consistency in the application of new arrangements under Part V by Local Authorities.</li> </ul>	<p>A <b>Part V Proposal</b> is included with this application under separate cover. It includes a letter from the Housing Section of DLRCR confirming that the Applicant has submitted a proposal for build and transfer of 12 no. apartments for social housing and 3 no. houses for affordable housing and they are satisfied that the proposal can form the basis of further compliance discussions, subject to planning permission.</p>
<p><b>Pathway 2: Pathway to Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion</b></p>	<p><b>HPO 3 – Work towards Ending Homelessness by 2030</b></p> <ul style="list-style-type: none"> <li>3.4 – Target 1,200 new Housing First tenancies from 2022 to 2026.</li> <li>3.5 – Housing First will be underpinned by the delivery of additional one-bed social housing homes.</li> </ul> <p><b>HPO 4 – Increase Social housing delivery.</b></p> <ul style="list-style-type: none"> <li>4.1 – Deliver over 10,000 social housing homes each year to 2030 and increase the stock of available social housing</li> <li>4.4 - End long-term leasing of social housing by Local Authorities and AHBs through phasing out new entrants and focussing on new-build to provide social homes.</li> </ul>	<p>As outlined above, the proposed development comprises the delivery of 15 no. social and affordable residential units to comply with the Part V obligations.</p> <p>The units will contribute to the achievement of the targets outlined in HPO 3 and 4 for the delivery of 10,000 social housing homes each year to 2030.</p> <p>The scheme is designed incorporating the principles of universal access and to the standards of Part M of the Building Regulations.</p> <p>The proposed development is designed with a Universal Design Approach i.e. so that it can be readily accessed and used by everyone, regardless of age, size, ability, or disability.</p>

Pathway	Relevant Aims / Targets / Policies	Compliance of the Proposed Development
	<p><b>HPO 6 - Increase and improve housing options for Older People.</b></p> <ul style="list-style-type: none"> <li>6.1 - Continue to support the development of the Age Friendly Homes portal and website, which promotes awareness of age friendly housing.</li> </ul> <p><b>HPO 7 - Increase and improve housing options and supports for people with a disability.</b></p>	
<p><b>Pathway 3:</b> Pathway to Increasing New Housing Supply</p>	<p><b>HPO 12 - Deliver a new approach to active land management</b></p> <ul style="list-style-type: none"> <li>12.2 - Develop proposals for new Urban Development Zones, to deliver a coordinated and transparent approach to the delivery of residential and urban development particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.</li> </ul>	<p>The subject site is currently underutilised, and activating it for the delivery of a medium-high-density residential scheme and achieving effective consolidation is consistent with the National Policy Objectives of the NPF to achieve a targeted pattern of growth.</p> <p>The development lands, comprised of 1.97ha., are on serviceable lands in an area earmarked for residential development proximate to existing public transport. The proposed development will therefore contribute to consolidation of the existing built urban form and promote the sequential growth of Dublin's metropolitan area, in line with the National Policy Objectives of the NPF to achieve a targeted pattern of growth.</p>

**Table 4:** Compliance with Housing for All (2021).

## 4. Section 28 Ministerial Guidelines

### 4.1 Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2020)

The Sustainable Urban Housing: Design Standards for New Apartments (**the New Apartments Guidelines**) (updated 2020) identify types of locations that may be suitable for apartment developments.

The New Apartment Guidelines highlight that apartments are most appropriately located within urban areas and that the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors, particularly in the vicinity of existing public transport nodes or locations where high frequency public transport can be provided. Three types of locations are identified:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

Our assessment concludes that the application site falls within the definition of a 'Central and/or Accessible Urban Location', namely because it is within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas).

The Guidelines state that central and/or accessible urban locations "*are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments*".

The proposed development comprises the development of 97 no apartment units in 1 no. apartment block, and 21 no. houses distributed across the balance of the application site.

This section addresses only the compliance of the apartment component of the proposal having regard to the New Apartments Guidelines (2020).

**SPPR 1** - this SPPR relates to housing mix where it is stated that schemes may include up to 50% one-bedroom units with no more than 20-25% of studio units, and there shall be no minimum requirement for apartments with three or more bedrooms. The proposed mix does not include studio apartments and the number of 1-bedroom apartments is well below the 50% threshold. The proposed apartment mix set out below is compliant with **SPPR 1**.

- 1-bed - 28 apartments - 29%
- 2-bed - 69 apartments - 71%

**SPPR 2** - The SPPR relates to building refurbishment schemes, or urban infill schemes on sites of up to 0.25ha. The proposed development site is 1.97 hectares and exceeds the area threshold, accordingly, SPPR 2 is not relevant.

**SPPR 3** - This SPPR sets out the required minimum apartment floor areas. The minimum floor areas have been met within all individual apartment units

and the majority of units exceed the minimum floor area as illustrated in the **Housing Quality Assessment** (CCK Architects). The requirement for the majority of all apartments to exceed the minimum floor area by a minimum of 10% is met, 75% of the proposed apartment units (73 no. apartments) will exceed this requirement.

**SPPR 4** - This SPPR requires that a minimum of 33% of dual aspect units is required in central and accessible urban locations. The scheme achieves 60% (58 no. apartments) dual aspect.

**SPPR 5:** This SPPR relates to ground level floor to ceiling heights, in this regard the proposed development meets the minimum requirement of 2.7m in all units.

**SPPR 6:** This SPPR limits the number of apartments per core to 12 no. per floor. Within the proposed apartment block, the number of apartments per core are below 12 units.

In relation to Private Amenity Space, it is a requirement to provide apartments with private open space in the form of balconies and terraces. The proposed development incorporates ground floor terraces with boundary treatment and balconies for the upper residential units in line with the requirement to provide 5sq.m for 1-bed units, 6sq.m for 2-bed (3 Person) units and 7sq.m for 2-bed (4 Person) units. Details are set out in the **Housing Quality Assessment** (CCK Architects).

Chapter 5 of the New Apartments Guidelines deals specifically with Build-To-Rent schemes. The proposed development is not a Build to Rent scheme and therefore the requirements associated with **SPPR 7** and **SPPR 8** do not apply.

Communal amenity space in the form of a centrally located courtyard (1,454sq.m) is provided at podium level for the proposed apartment block. The standards for communal amenity space set out in Appendix 1 of the New Apartments Guidelines generate a requirement for 618sq.m, thus the communal amenity space provided within the scheme will be well in excess of the minimum required. The **Daylight, Sunlight and Overshadowing Analysis** (Passive Dynamics) demonstrates that the amenity areas of the proposed development achieve upward of 2 hours of sunlight on the design day (21st March) across the vast majority of its total area, therefore complying with the BRE Guidelines.

The proposed streetscape and public realm have been designed to provide a high degree of amenity, connectivity and encourage activity by pedestrians and cyclists. The internal network segregates vehicular movement from pedestrian movement. The scheme prioritises pedestrian activity, enhancing the level of resident amenity within the development.

170 no. long-term cycle parking spaces for future residents and 56 no. short-term cycle parking spaces. The proposed development also incorporates 22 no. cycle spaces designated for the childcare facility.

The New Apartments Guidelines require that occupants and visitors should benefit from a sense of safety and security by overlooking of the public realm.

The scheme prioritises pedestrian movement within the internal layout to ensure desire lines within the site are accommodated, providing for direct links to the adjoining Stepside Park Estate and Clay Farm residential development.

Refuse Storage is a requirement of the New Apartments Guidelines in apartment schemes and must be accessible to each stair core and designed with regard to the projected waste generation, types, and quantities. Within apartments there must be sufficient provision for temporary storage of segregated materials prior to deposit in communal facilities. The proposed apartment block provides adequate storage within individual apartments and a communal waste storage area is provided at under-croft level.

Minimum internal Storage requirements are established in Appendix 1 of the Guidelines for New Apartments and the proposed development is in accordance with the minimum standards.

In relation to **Children's Play facilities**, the New Apartments Guidelines (2020) require that play needs are incorporated into apartment developments. A separate **Landscape Report** (BRR Landscape Architects) submitted with this application provides further details on the proposed play areas.

## 4.2 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)

The Urban Development and Building Heights Guidelines for Planning Authorities (**the Building Height Guidelines**) (2018) give expression to NPO 13 in the NPF.

The Building Height Guidelines highlight the positive contribution that taller buildings can make to our cities and towns. Paragraph 2.5 of the Guidelines states that:

*"(...) increased building height is a key factor in assisting modern place making and improving the overall quality of our urban environments".*

SPPR 1 of the Building Height Guidelines (2018) seeks to encourage increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and so prohibit the inclusion of blanket numerical limitations on building height in local statutory planning policies:

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

As outlined in Chapter 3 of the Building Height Guidelines, Planning Authorities must consider the following principles when assessing applications for buildings taller than overall building heights in urban areas.

***1 - Does the proposal positively assist in securing National Planning Framework objectives of focusing development on key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?***

**Response:** The application site is currently a zoned greenfield development site. Its development as proposed would consolidate the urban area of the County. The proposed development would positively assist with securing the following NPF objectives;

- NPO 2a - A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.
- NPO 3a - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements; and
- NPO 3b - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway, and Waterford, within their existing built-up footprints.

***2 - Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?***

**Response:** The Development Plan is recently adopted and has taken account of the specific planning policy requirements 1 and 2 in Chapter 2. In the context of this proposed development Policy Objective BHS2 as set out in the Building Height Strategy of the Development Plan (Appendix 5) is relevant. Policy Objective BHS 2 relates to '*Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan).*'

The Ballyogan & Environs Local Area Plan 2019-2025 (BELAP) acknowledges that the set of policies included in these Section 28 Guidelines will take precedence over the County Development Plan.

The applicable policy in respect of building height is set out in the approved Ballyogan and Environs Local Area Plan 2019-2025 under Policy BELAP RES5 which states:

*"Building Height by Scheme: Any planning application for a scheme which proposes buildings in excess of 4 storeys shall be accompanied by an analysis of building height and positioning of buildings with reference to the following issues:*

- *Impacts on the immediate and surrounding environment – streetscape, historic character.*

- *Impacts on adjoining structures, with a focus on overlooking and impact on residential amenity.*
- *Relationship to open spaces and public realm.*
- *Views and vistas.*
- *Daylight and sunlight, including shadow analysis where appropriate.*
- *Wind and microclimate analysis*
- *Impacts on residential amenity of these buildings from noise sources such as motorway noise.*
- *Placemaking and the ability of taller buildings to assist with legibility and wayfinding within a Neighbourhood."*

In line with the approach provided for under Policy BELAP RES5, there is no maximum height limit prescribed for the subject lands, rather building heights in excess of 4-storeys are permitted subject to the relevant assessment criteria being satisfactorily addressed. An assessment that responds to each of the criteria is included in the **Statement of Consistency** with Local Policy included under separate cover.

The proposal incorporates a range of building heights (3 to 6-storeys) within the proposed apartment block. The proposed layout creates a sensitive transition in height as detailed in the documentation that is submitted with this application.

***3 - Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?***

**Response:** The Development Plan came into effect in April 2022 and Ballyogan and Environs Local Area Plan is dated 2019 and therefore both statutory planning instruments came into force following publication of the 2018 Height Guidelines. Both plans were prepared having regard to the policies and objectives of the National Planning Framework (2018) which targets sustainable compact growth and densification through a range of measures that includes providing for increased building heights.

Section 3.2 sets out development management criteria which proposals for higher buildings are required to satisfy. The relevant criteria in respect of the proposed residential development are addressed in detail in the Planning Statement submitted under separate cover with this application and responded to as follows:

***At the scale of the relevant city / town***

**Response:** The application site is proximate to the LUAS Green Line, with the nearest stops, Leopardstown Valley to the north-east, being circa 800 metres walking distance of the subject site via Clay Farm. The Gallops LUAS stop is also located c. 600 metres to the north-east. The LUAS Green Line provides access

to Sandyford, Dundrum, the City Centre and northwards to other destinations along its route.

There are nearby bus stops at Ballyogan Road to the east (c. 750 metres) and Enniskerry Road (c. 500 metres) to the west.

Dublin Bus services at Enniskerry Road include the 44, 47 and 118 bus routes, while routes 63 and 63a run via Ballyogan Road. These routes connect the development lands to significant employment centres in Dublin's city centre. In terms of walking distances, providing a section of the Clay Farm Loop Road to connect with existing permitted Clay Farm residential communities will create a direct pedestrian route and shorten the walking distances to Ballyogan Road bus services and Luas Greenline services for existing residents of Stepside Park and Stepside Village.

The design and layout are informed by the existing landscape and residential properties in the area. The proposed development aims to integrate with the receiving landscape and create attractive and useable amenity spaces while contributing to local biodiversity.

The application is supported by an **Architectural Design Report** (CCK Architects), and **Landscape Report** (BRR Landscape Architects) which demonstrate that the scale of the proposed development responds positively to the site context and fully integrates with its surroundings.

Landscape proposals will serve to mitigate the potential impact of the proposed development, particularly at the existing band of mature trees in the proximity of the development site, and to enhance the immediate streetscape and wider built environment.

It is evident that the development area is in a state of transition with changes in the type of residential developments being built, increasingly incorporating taller building forms that depart from traditional 1-2 storey dwellings, details of which are included in the **Planning Statement** submitted under separate cover.

### *The district / neighbourhood / street*

**Response:** The proposed development is informed by an understanding of the existing natural and built environment, and post-application of mitigation measures it will not have an adverse effect on the local natural and built environment. This is demonstrated in the studies undertaken and subsequent reports submitted with this application.

The proposed development will bring a zoned, greenfield site into active use and promote vitality and vibrancy of the site and wider area through increased density, pedestrian permeability and an enhanced public realm. Thus, it will define the urban character of Stepside Park/Clay Farm and will act in concert with recent permitted developments at Clay Farm of similar nature and scale.

A **Site-Specific Flood Risk Assessment** (DBFL Engineers) is included under separate cover and concludes that the proposed residential development is acceptable at this location.

***The site / building***

**Response:** The proposed development will provide for 1-bed, 2-bed, 3-bed, and 4-bed units distributed across 21 no. houses and 97 no. apartments within an apartment block. The form and location of the proposed apartment building to the north of the site has evolved in response to the arrangement of existing houses adjacent to the western boundary, creating a residential perimeter block with internal communal open space. It also seeks to protect the existing band of mature trees along the north boundary and facilitates adequate separation between the proposed apartment block and the existing residential properties.

The proposed houses will integrate with the existing dwellings in the Stepside Park Estate and are positioned fronting the proposed public open spaces, which will encourage passive and active recreation, where residents can interact.

The **Daylight, Sunlight and Overshadowing Analysis** (Passive Dynamics) that accompanies this application demonstrates that the amenity areas of the proposed development achieve upward of 2 hours of sunlight on the design day (21st March) across the vast majority of their areas, therefore complying with the BRE Guidelines. In addition, the gardens of the neighbouring properties were also assessed for sunlight availability. These areas largely receive sufficient levels of sunlight in line with the BRE guidance, achieving 2 hours of sunlight over the vast majority of their total areas on the design day. Any instance where the BRE recommended level of sunlight is not achieved on the design day occurs within north-facing gardens, where the amenity area is shaded by the neighbouring property itself rather than the proposed apartment development. The proposed development will not cause a significant impact to the level of sunlight in the neighbouring gardens.

Regarding daylight availability, the results show that 100% of bedrooms and kitchen/living/dining areas within the proposed development meet the daylight requirements set out in both the previous BR209 guidance document (based on BS8206) and the latest BR209 guidance document (based on the national annex within BS EN17037). Further analysis was carried out to show that 99.62 of these spaces achieve the minimum recommended level of daylight according to the new European standard EN17037.

A **Site-Specific Flood Risk Assessment** (DBFL Engineers) is included under separate cover and concludes that the residential development proposed is appropriate for the site's flood zone category.

**Specific Assessments**

**Response:** In accordance with the **Building Height Guidelines**, specific assessments accompany this application are outlined below.

A list of all specific assessments submitted with this application are included in the **Planning Statement** (MH Planning).

**SPPR 3 states;**

*“It is a specific planning policy requirement that where;*

*(A)*

- 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and these guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”*

This application is accompanied by a suite of supporting information that fulfil the obligations of the Applicant for the development management process. The reports demonstrate that the proposed development is appropriate and will not give rise to significant negative impacts.

**SPPR 4 states:**

*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 (2007)” 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 monotype 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.*

Details relating to how the proposed development satisfy this criterion is included in the documentation that is submitted with this application under separate cover.

**4.3 Design Manual for Urban Roads & Streets (2013)**

This section should be read in conjunction with the **DMURS Compliance Statement** (DBFL Consulting Engineers), **Architectural Design Report**, **Landscape Report** and associated documentation submitted with this application under separate cover.

<b>Design Principles: Provisions</b>	<b>Compliance of the Proposed Development</b>
<p><b><i>Integrated Street Networks:</i></b>  <i>Does the development create connected centres that prioritise pedestrian movement and access to public transport?</i></p>	<p>The proposed development is served by existing and planned public transport services along the Enniskerry and Ballyogan Road.</p> <p>The proposed development will improve permeability at this site. The provision of pedestrian and cyclist links will create direct routes to existing public transport services at Ballyogan Road (including Luas Greenline services) to the east and Enniskerry Road and connect to existing communities at Stepside and Clay Farm.</p> <p>In terms of walking distances, the development lands are located c.800m west of Leopardstown Valley Luas Stop at Ballyogan Road. There are bus stops at Ballyogan Road to the east (c.750m) and Enniskerry Road (c.500m) to the west.</p>
<p><b><i>Movement and Place:</i></b>  <i>Does the development create a legible street hierarchy that is appropriate to its context?</i></p> <p><i>Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e., community centre, shops, creche, schools etc.)?</i></p>	<p>The proposed development incorporates a permeable and legible street network that offers route choice and flexibility for managing movement within it.</p> <p>There is a fully integrated pedestrian network with all the main landscape spaces connected to a universally accessible route.</p> <p>The proposed network is structured and will draw future occupants toward focal points including the centrally positioned public open space.</p>
<p><b><i>Permeability and Legibility:</i></b>  <i>Has the street layout been well considered to maximise permeability for pedestrians and cyclists?</i></p> <p><i>Are the streets legible with maximum connection opportunities?</i></p>	<p>The layout provides for safe and permeable pedestrian and cycle routes facilitating connections within the proposed development and to the local street network.</p> <p>Additionally, provision will be made for pedestrian and cyclist access onto the proposed section of Clay Farm Loop Road running along the east of the site.</p>
<p><b><i>Management:</i></b>  <i>Is the layout designed to self-regulate vehicle speeds and traffic congestion?</i></p>	<p>The proposed internal layout will prioritise pedestrian and cyclist movement and be designed to separate and self-regulate driver behaviour through a single access vehicular road, encouraging low speed.</p>

Design Principles: Provisions	Compliance of the Proposed Development
<p><i>Does the proposed layout minimise noise / air pollution wherever possible?</i></p>	<p>Design of the internal vehicular roads has been undertaken to maximise space allocated for pedestrians and cyclists, and amenity spaces.</p> <p>By assigning the majority of car parking to the under-croft car park, pedestrian movement is prioritised at ground level.</p> <p>The residential blocks are compliant with Part E of the Building Regulations and as such sound insulation measures are considered.</p> <p>The location of the site, adjacent to existing and proposed public transport services, will promote the use of public transport thus contributing to reduced air emissions.</p>
<p><b><i>Movement, Place and Speed</i></b></p> <p><i>Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed?</i></p> <p><i>Does the design promote a reasonable balance of both physical and psychological measures to regulate speed?</i></p>	<p>The proposed internal layout will prioritise pedestrian and cyclist movement and be designed to separate and self-regulate driver behaviour.</p> <p>Design of the internal vehicular access road has been undertaken to maximise space allocated for pedestrians and cyclists, and amenity spaces.</p> <p>By assigning the majority of car parking to the under-croft car park, pedestrian movement is prioritised at ground level.</p>
<p><b><i>Streetscape:</i></b></p> <p><i>Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure?</i></p> <p><i>Have street trees and areas of planting been provided where appropriate?</i></p> <p><i>Have active street edges been provided where appropriate?</i></p> <p><i>Is a palette of high-quality surface materials and finishes provided?</i></p>	<p>The proposed scheme has been designed with regard to a comprehensive landscape plan that is carefully considered to provide a high-quality response to the development of this site including a palette of high-quality materials ensuring that finishes last well and landscaping species are appropriate to existing biodiversity within the wider area.</p> <p>Throughout the scheme a comprehensive planting scheme including trees, shrubs and groundcover is proposed to create a comfortable and attractive urban environment.</p> <p>The apartment block will include ground floor units with private amenity spaces to</p>

Design Principles: Provisions	Compliance of the Proposed Development
	<p>ensure that the footways and communal amenity spaces are activated.</p> <p>Please refer to the <b>Architectural Design Report</b> (CCK Architects) for detail on the palette of materials to be used on site.</p>
<p><b>Pedestrian and Cyclist Environment:</b></p> <p><i>Are footways of appropriate width provided so as to ensure pedestrian safety?</i></p> <p><i>Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations?</i></p> <p><i>Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required?</i></p> <p><i>Have cycle facilities been factored into the design?</i></p>	<p>All footways within the development site will be in accordance with DMURS width requirements to safeguard pedestrian safety.</p> <p>The proposed internal layout ensures that pedestrians are given priority and that desire lines within the site are accommodated, providing a good level of service, ensuring potential pedestrian and vehicle conflict is minimised and providing attractive convenient connections to key external walking desire lines.</p> <p>A high degree of pedestrian permeability and connectivity throughout the site is created. Further details are included in the <b>Architectural Design Report</b> (CCK Architects) and <b>Landscape Report</b> (BRR Landscape Architects) that is submitted with this application.</p> <p>Cycle facilities have also been included as detailed in the documents submitted with this application.</p>
<p><b>Carriageway Conditions:</b></p> <p><i>Are vehicular carriageways sized appropriately for their function / location?</i></p> <p><i>Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions?</i></p> <p><i>Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists?</i></p> <p><i>Have adequate parking / loading areas been provided?</i></p>	<p>Internal vehicular road size and materials are in accordance with DMURS requirements. Further details are provided in the Engineering documentation prepared by DBFL Consulting Engineers and submitted with this application.</p> <p>The internal road network has also been designed to accommodate circulation of refuse vehicles and emergency vehicles.</p>

**Table 5:** Compliance with DMURS design principles & provisions.

#### 4.4 Sustainable Residential Development in Urban Areas (2009)

Relevant Policy / Principle / Guideline	Compliance of the Proposed Development
<p><b>Chapter 3 – The Role of Design</b></p> <ul style="list-style-type: none"> <li>▪ <i>Have designers carried out a site appraisal prior to preparing a layout?</i></li> <li>▪ <i>Is the standard of design of a sufficiently high standard?</i></li> <li>▪ <i>Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place?</i></li> </ul>	<p>The built and natural sensitives of the proposed development site were assessed at the early stages of the project and informed the layout. The results are included in the <b>Architectural Design Report</b>, the <b>Landscape Report</b> (BRR Landscape Architects), the <b>Arboricultural Impact Assessment</b> (CMK Hort. + Arb), and the <b>Environmental Impact Assessment Screening Report</b> (MH Planning) submitted under separate cover.</p> <p>The aforementioned supporting documentation that accompanies this planning application demonstrates that the proposed scheme meets relevant performance-based criteria and is of a high standard of design.</p> <p>The proposed development will improve existing connections with the surrounding street network, in particular, it will provide pedestrian and cyclist links with the existing Stepside Park estate and permitted developments at Clay Farm, which will benefit all new occupants and create a direct route to the Ballyogan Road and Enniskerry Road.</p> <p>Pedestrian and cyclist permeability is prioritised within the scheme through segregated internal vehicular movement and an extensive public realm.</p> <p>The proposed development will improve pedestrian permeability across the area. Provision has been made for pedestrian connections via the proposed section of the Clay Farm Loop Road running through the site and the existing pedestrian network within Stepside Park.</p>
<p><b>Chapter 4 - Planning for Sustainable Neighbourhoods</b></p> <ul style="list-style-type: none"> <li>▪ <i>Are lands in accordance with sequencing priorities of development plan or local area plan?</i></li> </ul>	<p>The proposed development is on serviced lands in an area earmarked for residential development within a short walking distance of high-capacity, high-frequency public transport. As such, the development of these lands will be in accordance with the principles of densification, consolidation, and compact</p>

Relevant Policy / Principle / Guideline	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>▪ <i>Assessment of the capacity of existing schools.</i></li> <li>▪ <i>Input of other necessary agencies into the plan/development proposal?</i></li> <li>▪ <i>Is there an appropriate range of community and support facilities?</i></li> <li>▪ <i>For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development.</i></li> </ul> <p><b>Will the development:</b></p> <ul style="list-style-type: none"> <li>▪ <i>Prioritise public transport, cycling and walking, and dissuade the use of cars.</i></li> <li>▪ <i>Ensure accessibility for everyone including people with disabilities.</i></li> <li>▪ <i>Encourage more efficient use of energy and reduction in greenhouse gases.</i></li> <li>▪ <i>Include right quality and quantity of public open space.</i></li> <li>▪ <i>Include measures for satisfactory standards of personal safety and traffic safety.</i></li> <li>▪ <i>Present an attractive and well-maintained appearance.</i></li> <li>▪ <i>Promote social integration, provide for diverse range of household types, age groups and housing tenures.</i></li> <li>▪ <i>Protect and where possible enhance the built and natural heritage.</i></li> </ul>	<p>growth. The development site is not subject to sequencing requirements in the County Development Plan. The Development Plan and BELAP 2019-2025 do seek to restrict development of lands included in the Kilgobbin Site Development Framework until such time as the Clay Farm Loop Road is in place. A response to this matter is set out in detail in the <b>Planning Statement</b> and <b>Material Contravention Statement</b> submitted under separate cover.</p> <p>This application is accompanied by a <b>Childcare Assessment Report</b> (MH Planning) and demonstrates that the proposed childcare facility will be sufficient to accommodate the potential demand generated from the proposed development and cater to wider need.</p> <p>A <b>Social Infrastructure Audit</b> (MH Planning) is also submitted under separate cover.</p> <p>Irish Water have confirmed the feasibility of the proposed development and issued a Confirmation of Feasibility and Statement of Design Acceptance, appended to the <b>Infrastructure Design Report</b> (DBFL Engineers).</p> <p>Walking and cycling are promoted through convenient connections to residential communities at Stepside Park Estate to the south and west, Clay Farm developments to the east of the development lands, and secure cycle parking facilities.</p> <p>The proposed development provides for sufficient car parking spaces as outlined in the <b>Traffic and Transport Assessment</b> that is submitted with this application.</p> <p>Vehicular traffic is segregated from pedestrian/cyclist movements.</p> <p>The scheme is designed to incorporate the principles of universal access and the standards of Part M of the Building Regulations.</p>

Relevant Policy / Principle / Guideline	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>▪ <i>Provide for Sustainable Drainage Systems.</i></li> </ul>	<p>The proposed development is designed to Universal Design principles ensuring access for all.</p> <p>The scheme is designed to NZEB standards, meaning it will achieve a high level of energy efficiency and consequent reduction in the generation of Green House Gases. The level of cycle parking across the scheme will also contribute to a reduction in emissions by promoting sustainable travel.</p> <p>The <b>Housing Quality Assessment</b> (CCK Architects) that accompanies this planning application demonstrates that the scheme exceeds the public open space requirement.</p> <p>The <b>Landscape Report</b> (BRR Landscape Architects) outlines the hierarchy of proposed open spaces providing for both active and passive use that will cater for different age groups.</p> <p>Increased levels of pedestrian activity by the inclusion of new connections will improve passive surveillance and result in a safer environment.</p> <p>The <b>Architectural Design Report</b> (CCK Architects) presents the detail of the scheme's materiality and confirms that it will be an attractive place to live, work and play.</p> <p>The mix of units proposed includes 1, 2, 3 and 4-bedroom units that will include houses and apartments.</p> <p>Social and affordable accommodation will form part of the proposed scheme.</p> <p>The landscape proposals include features to enhance the biodiversity value of the site.</p> <p>A comprehensive surface water drainage strategy with SuDS features is proposed.</p>
<p><b>Chapter 5 - Planning for Sustainable Neighbourhoods</b></p> <ul style="list-style-type: none"> <li>▪ <i>Are residential densities sufficiently high in a location which are, or will be, served by public transport.</i></li> </ul>	<p>The proposed density is 79 units per hectare across the site. This residential density is appropriate given the receiving natural and built environment and the proximity of the application site to public transport services.</p> <p>The <b>Architectural Design Report</b> and <b>Housing Quality Assessment</b> (CCK</p>

Relevant Policy / Principle / Guideline	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>▪ <i>Are higher densities accompanied by high qualitative standard of design and layout?</i></li> <li>▪ <i>Does the design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking?</i></li> </ul>	<p>Architects), submitted with this planning application, demonstrates that the scheme meets the qualitative requirements for apartment development. 67% (79 no.) of the units are dual aspect, this exceeds the minimum required on site.</p> <p>The <b>Daylight, Sunlight and Overshadowing Analysis</b> (Passive Dynamics) submitted with this application, concludes that the proposed development will not cause a significant impact on the adjoining properties and that the development proposal is in line with BRE guidelines.</p>
<p><b>Chapter 7 – The Home and its setting</b></p> <ul style="list-style-type: none"> <li>▪ <i>In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings.</i></li> <li>▪ <i>Decent levels of amenity, privacy, security, and energy efficiency.</i></li> <li>▪ <i>Will orientation of dwelling and internal layout maximise levels of daylight and sunlight?</i></li> <li>▪ <i>Has privacy been considered in design of the home?</i></li> <li>▪ <i>Has the design sought to create child and pedestrian friendly car-free areas?</i></li> <li>▪ <i>Has the design been influenced by the principles of universal design?</i></li> <li>▪ <i>Has adequate provision been made for the storage and collection of waste materials?</i></li> </ul>	<p>The proposed residential development will be a high-quality energy-efficient design. Finishes have been carefully considered to integrate with the established residential character of surrounding developments whilst creating a distinctive new urban residential development with its own identity.</p> <p>The buildings are NZEB compliant, provide for passive surveillance, include a comprehensive landscaping scheme that meets established standards and provides occupants with a wide range of support services.</p> <p>60% of the proposed apartment units are dual aspect units. The <b>Daylight, Sunlight and Overshadowing Analysis</b> (Passive Dynamics) concludes that future occupants will enjoy good daylight levels within the proposed development and have access to reasonable levels of sunlight in the adjoining proposed amenity areas.</p> <p>The units are designed to avoid overlooking, and all residential units will comply with the requirements of Part E in terms of noise insulation.</p> <p>The design is focused on prioritising pedestrians, promoting active modes of travel, and creating safe areas for children’s play.</p> <p>The design complies with the requirements of Part M of the Building Regulations and principles of universal design.</p>

Relevant Policy / Principle / Guideline	Compliance of the Proposed Development
	Dedicated residential waste storage areas will be provided on site.

**Table 6:** Compliance with Sustainable Residential Development in Urban Areas (2009).

#### 4.5 Urban Design Manual – A Best Practice Guide (2009)

This section should be read in conjunction with the **Architectural Design Report** (CCK Architects) and **Landscape Report** (BRR Landscape Architects) that accompanies this application under separate cover.

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<p><b>Criteria no. 1</b></p> <p><b>Aspect - Context:</b> <i>How does the development respond to its surroundings?</i></p> <ul style="list-style-type: none"> <li>▪ <i>The development seems to have evolved naturally as part of its surroundings.</i></li> <li>▪ <i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i></li> <li>▪ <i>Form, architecture, and landscaping have been informed by the development's place and time.</i></li> <li>▪ <i>The development positively contributes to the character and identity of the neighbourhood.</i></li> <li>▪ <i>Appropriate responses are made to the nature of specific boundary conditions.</i></li> </ul>	<p>The design and layout of the proposed development responds to the scale of surrounding development. Care has been taken to ensure that the scale of the development integrates and respects its environs and the form of residential developments in the area.</p> <p>Analysis demonstrates that adjacent land uses will not be adversely impacted by the proposed development regarding access to sunlight and daylight. Please refer to the <b>Daylight, Sunlight and Overshadowing Analysis</b> (Passive Dynamics) for further information.</p> <p>The form and location of the proposed apartment building to the north of the site evolved in response to the arrangement of existing houses adjacent to the western boundary, creating a residential perimeter block with internal communal open space. It also seeks to protect the existing band of mature trees along the northern boundary and facilitates adequate separation between the proposed apartment block and the existing residential properties.</p> <p>The proposed houses will integrate with the existing housing in the Stepside Park Estate and are positioned fronting the proposed public open spaces, which will encourage passive and active recreation, where residents can interact.</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<p><b>Criteria no. 2</b></p> <p><b>Aspect - Connections:</b> <i>How well connected is the new neighbourhood?</i></p> <ul style="list-style-type: none"> <li>▪ <i>There are attractive routes in and out for pedestrians and cyclists.</i></li> <li>▪ <i>The development is located in or close to a mixed-use centre.</i></li> <li>▪ <i>The development's layout makes it easy for a bus to serve the scheme.</i></li> <li>▪ <i>The layout links to existing movement routes and the places people will want to get to.</i></li> <li>▪ <i>Appropriate density, dependent on location, helps support efficient public transport.</i></li> </ul>	<p>The proposed development includes for extension of the Clay Farm Loop Road within the site. The extension of this road will allow for vehicular access and pedestrian and cyclists' paths connecting to Clay Farm Phase 2 development. As such, it will create a direct link to the Ballyogan Road public transport network.</p> <p>All routes through the scheme will facilitate pedestrians and cyclists.</p> <p>Vehicular movement will be provided to access/exit the proposed undercroft car park of the apartment block, the in-curtilage parking spaces at the front of the proposed houses, and services.</p> <p>The scheme prioritises pedestrian mobility within the internal layout to ensure that pedestrian desire lines are accommodated.</p> <p>The proposed development will allow for direct routes to the public transport infrastructure available locally (i.e., Ballyogan Road and Enniskerry Road).</p> <p>The development lands are located within c.8000m walking distance of Leopardstown Valley Luas Stop at Ballyogan Road. There are bus stops at Ballyogan Road to the east (c.750m) and Enniskerry Road (c.500m) to the west.</p> <p>Dublin Bus services at Enniskerry Road includes the 44, 47 and 118 bus routes, while routes 63 and 63a run via Ballyogan Road. These routes connect the development lands to significant employment centres at Dublin's city centre. In terms of walking distances, providing a section of the Clay Farm Loop Road to connect with existing permitted Clay Farm residential development will create a direct pedestrian route and shorten the walking distances to existing public transport infrastructure for established residential developments at Stepside Park and Stepside Village.</p> <p>The proposed scheme incorporates the construction of the associated section of the Clay Farm Loop Road, connecting the site to</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
	<p>Clay Farm Phase 2 development and creating a direct route to Ballyogan Road.</p> <p>Stepaside Village and Leopardstown Shopping Centre is located proximate to the development site and provides many services and amenities.</p>
<p><b>Criteria no. 3</b></p> <p><b>Aspect - <i>Inclusivity</i>:</b> How easily can people use and access the development?</p> <ul style="list-style-type: none"> <li>▪ <i>New homes meet the aspirations of a range of people and households.</i></li> <li>▪ <i>Design and layout enable easy access by all.</i></li> </ul>	<p>The residential units within the scheme have been fully designed in accordance with all relevant guidelines and standards in terms of size, storage areas, private open space, etc.</p> <p>The scheme is considered to respond well in providing a range of housing typologies to meet the demand of varying households.</p> <p>The development is designed to meet all Part M requirements. The scheme has been sensitively designed to ensure ease of travel through the public realm and the buildings for people of all abilities.</p> <p>The scheme avoids steep ramps, slopes, and stairs and provides clear, legible routes through the site and communal and public open space areas.</p>
<p><b>Criteria no. 4</b></p> <p><b>Aspect - <i>Variety</i>:</b> How does the development promote a good mix of activities?</p> <ul style="list-style-type: none"> <li>▪ <i>Activities generated by the development contribute to the quality of life in its locality.</i></li> <li>▪ <i>Uses that attract the most people are in the most accessible places.</i></li> <li>▪ <i>Neighbouring uses and activities are compatible with each other.</i></li> <li>▪ <i>Housing types and tenure add to the choice available in the area.</i></li> <li>▪ <i>Opportunities have been taken to provide shops, facilities and services that complement those</i></li> </ul>	<p>The proposed development provides a good mix of houses and apartments of varying sizes, which will cater to a mix of households across the scheme.</p> <p>Whilst primarily a residential scheme designed to meet the significant shortfall in residential accommodation in Dublin's suburbs, the location of the proposed development, within walking distance of Stepaside Village and Leopardstown Valley, and new mixed-use developments at Clay Farm will encourage higher levels of pedestrian and cyclist activity.</p> <p>The proposed development will provide residential amenities for future residents, including communal areas, public open space, and a childcare facility.</p> <p>The size, extent, and design of communal and public open spaces will encourage passive and active recreation, in a highly landscaped attractive setting where</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<p><i>already available in the neighbourhood.</i></p>	<p>residents can interact, as detailed in the Landscape Design Report.</p> <p>In terms of commercial and retail facilities, as previously indicated, the primary purpose of the residential scheme is to meet a clear demand for sustainable private housing. Having regard to the short distance of the proposed development to Steposide Village, Carrickmines Park and Leopardstown Shopping Centre and acknowledging their range of services and facilities, no commercial uses are provided within the scheme. The permitted Clay Farm Phase 2 development on the adjoining lands incorporates a neighbourhood centre with 2 no. retail units which will also benefit future residents within the scheme.</p>
<p><b>Criteria no. 5</b></p> <p><b>Aspect - <i>Efficiency</i>.</b> <i>How does the development make appropriate use of resources, including land?</i></p> <ul style="list-style-type: none"> <li>▪ <i>The proposal looks at the potential of higher density, considering appropriate accessibility by public transport and the objectives of good design.</i></li> <li>▪ <i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i></li> <li>▪ <i>Buildings, gardens, and public spaces are laid out to exploit the best solar orientation.</i></li> <li>▪ <i>The scheme brings an underutilised and semi-derelict site into more productive use.</i></li> </ul>	<p>The site offers an excellent opportunity to make a meaningful contribution to the shortfall in the housing market by providing for a medium-high density residential development in a highly accessible location within the built up area of Dublin.</p> <p>The proposed development provides for a net density of 79 units per hectare. This is regarded as an efficient use of the subject lands. In addition, the proposed residential density will allow the scheme to integrate with permitted densities in the immediate locality.</p> <p>The site is proximate to public transport services at Ballyogan Road and Enniskerry Road. As such, the lands are ideally suited to increased densities in a manner that ensures that there is no negative impact on internal or external environments.</p> <p>A set of Photomontages have been prepared for the proposed development and are submitted with the application documents. A Landscape and Visual Impact Assessment has been prepared and is submitted under separate cover.</p> <p>The Daylight, Sunlight and Overshadowing Analysis demonstrate that the scale and height of the proposed development does</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li>▪ <i>Appropriate recycling facilities are provided.</i></li> </ul>	<p>not have any significant negative impact on the external environment in terms of overshadowing or sunlight impact.</p> <p>In terms of landscaped areas, the proposed development is in close proximity to significant open space and public amenities in the surrounding area. High-quality communal and public open space is provided, with appropriate soft landscaping that contributes to biodiversity and the overall quality enhancement of the public realm.</p>
<p><b>Criteria no. 6</b></p> <p><b>Aspect - <u>Distinctiveness</u>.</b> <i>How does the proposal create a sense of place?</i></p> <ul style="list-style-type: none"> <li>▪ <i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i></li> <li>▪ <i>The scheme is a positive addition to the identity of the locality.</i></li> <li>▪ <i>The layout makes the most of the opportunities presented by existing buildings, landform, and ecological features to create a memorable layout.</i></li> <li>▪ <i>The proposal successfully exploits views into and out of the site.</i></li> <li>▪ <i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i></li> </ul>	<p>The proposed development has been designed to provide a series of related but distinctive character areas, each providing a unique sense of place for residents.</p> <p>The apartment block to the north of the lower site will provide a visual landmark along the proposed Clay Farm Loop Road running through the site. It also allows for adequate separation from the existing band of mature trees that exists along the northern boundary. The proposed houses are arranged to front the proposed public open spaces, encouraging passive and active recreation, where residents can interact.</p> <p>In terms of landscaped areas, the proposed development aims to integrate with the existing landscape and create attractive and useable amenity spaces while contributing to local biodiversity. Circulation through the scheme has been provided through a comprehensive network of pedestrian paths that allows pedestrian access to the full extent of the site. It also directly links to existing communities at Stepside Park estate and new communities at Clay Farm.</p> <p>Please refer to the <b>Landscape Report</b> (BRR Landscape Architects) and <b>Architectural Design Report</b> (CCK Architects) for further details.</p>
<p><b>Criteria no. 7</b></p>	<p>The proposed layout includes the development of a network of pedestrian routes that follow desire lines.</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<p><b>Aspect - <u>Layout</u>:</b> <i>How does the proposal create people-friendly streets and spaces?</i></p> <ul style="list-style-type: none"> <li>▪ <i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i></li> <li>▪ <i>The layout focuses activity on the streets by creating active frontages with front doors directly serving the street.</i></li> <li>▪ <i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists, and drivers.</i></li> </ul>	<p>The pedestrian routes allow for direct links to Stepside Park estate, the proposed section of the Clay Farm Loop Road and the permitted development at Clay Farm. As a result, future occupants and existing communities will benefit from direct pedestrian and cyclist routes to Ballyogan Road and Enniskerry Road.</p> <p>Vehicular access to the site will be provided from the proposed section of the Clay Farm Loop Road.</p> <p>A significant portion of the internal layout consists of shared pedestrian and bicycle surfaces and public open space areas to encourage pedestrian and cyclist use and permeability.</p>
<p><b>Criteria no. 8</b></p> <p><b>Aspect - <u>Public Realm</u>:</b> <i>How safe, secure, and enjoyable are the public areas?</i></p> <ul style="list-style-type: none"> <li>▪ <i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i></li> <li>▪ <i>The public realm is considered as a usable integrated element in the design of the development</i></li> <li>▪ <i>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i></li> <li>▪ <i>There is a clear definition between public, semiprivate, and private space.</i></li> </ul>	<p>The proposed apartment block and houses will provide passive surveillance of the communal and public open spaces, including proposed children's play areas.</p> <p>The proposed open spaces have been designed as an integral element of the scheme.</p> <p>Public and private amenity spaces are clearly defined within the proposed development.</p> <p>The proposed development's layout and design will provide the desired level of security whilst the soft landscape materials and planting will provide a high level of residential amenity by ensuring attractive usable spaces, linking inside and outside living.</p> <p>Private amenity space at ground level of the apartment block is provided with a planted privacy buffer.</p> <p>Car parking serving the apartment block is provided under-podium level, and this</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<ul style="list-style-type: none"> <li><i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i></li> </ul>	<p>design measure maximises the space available for landscaping.</p>
<p><b>Criteria no. 9 Aspect - Adaptability:</b> <i>How will the buildings cope with change?</i></p> <ul style="list-style-type: none"> <li><i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i></li> <li><i>The homes are energy-efficient and equipped for challenges anticipated from a changing climate.</i></li> <li><i>Homes can be extended without ruining the character of the types, layout, and outdoor space.</i></li> </ul>	<p>The proposed development provides a mix of 1 and 2-bedroom apartments and 3 and 4-bedroom houses.</p> <p>Generous storage provision is available in all apartment units and additional cycle storage space is available within the undercroft car park. Full details are included in the <b>Housing Quality Assessment</b> (CCK Architects).</p> <p>All residential units are designed to meet current Part L &amp; NZEB requirements and will be highly energy efficient.</p>
<p><b>Criteria no. 10 Aspect - Privacy and Amenity:</b> <i>How does the scheme provide a decent standard of amenity?</i></p> <ul style="list-style-type: none"> <li><i>Each home has access to an area of useable private outdoor space.</i></li> <li><i>The design maximises the number of homes enjoying dual aspect.</i></li> <li><i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i></li> <li><i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i></li> <li><i>The homes are designed to provide adequate storage including space</i></li> </ul>	<p>All apartment units include private useable open space, either in the form of a balcony or ground floor terrace.</p> <p>Dual aspect is provided for at 67% of all dwelling units across the scheme, with the apartments achieving 60% dual aspect.</p> <p>All apartment units are designed to current building regulation (Part E) standards and ensure appropriate sound/acoustic environments.</p> <p>Adequate storage is provided in all apartment units, meeting or exceeding minimum requirements.</p> <p>All houses are provided with private open space, areas for bin storage, and adequate internal storage.</p>

Criteria, Aspect & Provisions	Compliance of the Proposed Development
<p><i>within the home for the sorting and storage of recyclables.</i></p>	
<p><b>Criteria no. 11</b></p> <p><b>Aspect - <i>Parking</i>:</b> <i>How will parking be secure and attractive?</i></p> <ul style="list-style-type: none"> <li>▪ <i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i></li> <li>▪ <i>Adequate secure facilities are provided for bicycle storage.</i></li> </ul>	<p>Each proposed house is allocated 2 no. parking spaces within the front curtilage.</p> <p>Each proposed apartment is allocated 1 no. parking space, located under podium level with direct vehicular access off the proposed section of the Clay Farm Loop Road.</p> <p>Resident bicycle parking is also provided throughout the development.</p>
<p><b>Criteria no. 12</b></p> <p><b>Aspect - <i>Detailed Design</i>:</b> <i>How well thought through is the building and landscape design?</i></p> <ul style="list-style-type: none"> <li>▪ <i>The materials and external design make a positive contribution to the locality.</i></li> <li>▪ <i>The landscape design facilitates the use of the public spaces from the outset.</i></li> <li>▪ <i>Design of the buildings and public space will facilitate easy and regular maintenance.</i></li> <li>▪ <i>Care has been taken over the siting of flues, vents, and bin stores.</i></li> </ul>	<p>The materiality is carefully considered and integrates with the existing character of the wider area. The choice of materials for the proposed houses and the apartment block, is in keeping with the area's character. Details are provided in the <b>Architectural Design Report</b>.</p> <p>A comprehensive landscape strategy incorporating a range of landscape spaces distributed throughout the scheme and permeability has been provided through a comprehensive network of pedestrian paths.</p> <p>Secure communal bin stores will be provided as part of the development proposal.</p>

**Table 7:** Compliance with Urban Design Manual – A best Practice Guide (2009).

## 4.6 Childcare Facilities Guidelines for Planning Authorities (2001)

This section should be read in conjunction with the **Childcare Assessment Report** (MH Planning) that accompanies this application under separate cover.

The proposed development comprises the provision of a crèche/childcare facility (c. 156 sq.m), which is in accordance with the land-use zoning objective and the LAP land use concept for the development site. The **Childcare Assessment Report** demonstrates that the proposed childcare facility will be sufficient to accommodate the demand generated from the proposed development.

# 5. Compliance with Regional Planning Policy (2019)

## 5.1 Eastern & Midland Regional Spatial & Economic Strategy 2019-2031

The Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RSES) 2019-2031 anticipates that Dublin City and Suburbs will experience population growth of 220,000 over the period 2019-2031. The NPF targets 50% of all housing to be provided within, or contiguous, to the built-up area of Dublin city and suburbs.

Table 7 details the compliance of the proposed development at the subject site with the relevant regional policy objectives contained in the RSES.

Regional Policy Objective (RPO)	Compliance of the Proposed Development
<p><i>3.4 - Ensure that all plans, projects, and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including S.E.A., E.I.A. and A.A. as appropriate.</i></p>	<p>An <b>Environment Impact Assessment Screening Report</b> (MH Planning) and <b>AA Screening Report</b> (Altamar Environmental) are included with this application.</p> <p>The <b>AA Screening Report</b> concludes that the proposal will not impact designated sites alone or in combination with other plans/projects.</p>
<p><i>5.3 - Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a</i></p>	<p>The proposed development is well connected to road and public transport infrastructure as detailed in the documentation submitted with this application.</p>

Regional Policy Objective (RPO)	Compliance of the Proposed Development
<i>safe attractive street environment for pedestrians and cyclists.</i>	
<b>5.4</b> - <i>Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines' and 'Urban Development and Building Heights Guidelines for Planning Authorities'.</i>	The proposed residential density is 79 uph and is compliant with the qualitative standards for sustainable residential development.
<b>5.5</b> - <i>Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.</i>	The proposed residential scheme and development of these lands would realise the objective of consolidation of Dublin's metropolitan area and assist with the delivery of the regional strategic objectives as set out in the MASP.
<b>8.7</b> - <i>To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.</i>	A <b>Mobility Management Plan</b> is included with this application, under separate cover.
<b>9.13</b> - <i>Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in</i>	The proposed development is designed in accordance with the Building Regulations Part M, Universal Design principles.

Regional Policy Objective (RPO)	Compliance of the Proposed Development
<i>which people of all ages can live full, active, valued, and healthy lives.</i>	

**Table 8:** Compliance with the RPOs.

## 6. Conclusion

This SoC demonstrates that the proposed development is in compliance with relevant national and regional planning policy together with Section 28 ministerial guidelines. Compliance with the Dún Laoghaire-Rathdown Development Plan is established in the Planning Statement that accompanies this application under separate cover.

The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy.

The proposed development offers a unique opportunity to transform this under-utilised greenfield site into a vibrant place for future occupants and will contribute to the supply of much needed housing. Thus, development of this Stepside site will increase the available housing stock and add vitality to the local area, significantly improving the site's permeability and creating an attractive public realm.

The overarching objective is to create a vibrant new residential neighbourhood. The current proposal achieves this by providing opportunities to enhance legibility and connectivity to the site and surrounding street network, benefitting surrounding residents and future occupants. The proposed development will create a medium-high density residential development underpinned by a height strategy that responds with sensitivity to surrounding housing whilst delivering an appropriate scale of development for this strategic site.

The proposed development responds to the housing demands of the local community and workforce by incorporating a mix of unit typologies that will address the chronic shortfall in residential accommodation and meet the identified needs of Dún Laoghaire-Rathdown. The proposed scheme also incorporates additional supporting community functions, to maximise residential amenity. This residential led development has been designed to meet and where possible exceed the requirements of the Design Standards for New Apartments Guidelines (2020).

The architectural drawings, considered in conjunction with the **Architects Design Statement** and **Housing Quality Assessment** (CCK) demonstrate the applicant's commitment to delivering a well-designed scheme that will create a vibrant and attractive urban neighbourhood.

The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the established residential character of this site.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality

Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála.