



THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

**Prepared in Respect of a Planning
Application for Permission for a Large-
Scale Residential Development
Comprising 135 No. Residential Units at
Lands in Glenamuck North, Kilternan,
Dublin 18**

**Prepared on Behalf of Durkan Glenamuck
Development Limited**

December 2025

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1.0 INTRODUCTION

Durkan Glenamuck Development Limited¹ has retained Thornton O'Connor Town Planning², in association with a multi-disciplinary design team as detailed in the table in Section 1.3 below, to prepare this Large-Scale Residential Development ('LRD') Planning Application for the provision of 135 No. residential units at a c. 3.27 Ha site on lands in Glenamuck North, Kilternan, Dublin 18.

The site is generally bounded by: the recently constructed Glenamuck District Distributor Road to the north (to be known as the Kilternan Road); the under construction Glenamuck Link Distributor Road to the east (to be known as the Kilternan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west.

Masterplan Area

The lands subject to this LRD Planning Application are part of a wider Masterplan area being prepared by the Applicant and Design Team, which also includes land north of the future Kilternan Road. Due to greater site constraints on the northern lands (220Kv and 110Kv powerlines and the Glenamuck Stream traversing the site), the layout for the lands require further consideration; however, at the time of writing, the current layout for these northern lands will facilitate the provision of 219 No. residential units comprising a mix of houses, apartments and duplexes (44 No. 1-bed units, 45 No. 2-bed units, 112 No. 3-bed units and 18 No. 4-bed units), a creche and public open space.

The creche to be provided within the northern lands has been designed and sized to provide c. 500 sq m of floor space and c. 80 No. childcare spaces which will serve the childcare requirement of the northern lands as well as the subject southern lands. The size of the creche is an approximate at the time of writing and finalised details will be provided in a separate application to be lodged to DLRCC before the expiration of the northern lands LRD Opinion in February 2026.

An indicative schematic layout of the northern lands is illustrated on the site layout plan (Figure 1.1 overleaf).

¹ 1st Floor, Maple House, Lower Kilmacud Road, Stillorgan, Co. Dublin

² No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, D14 EA89

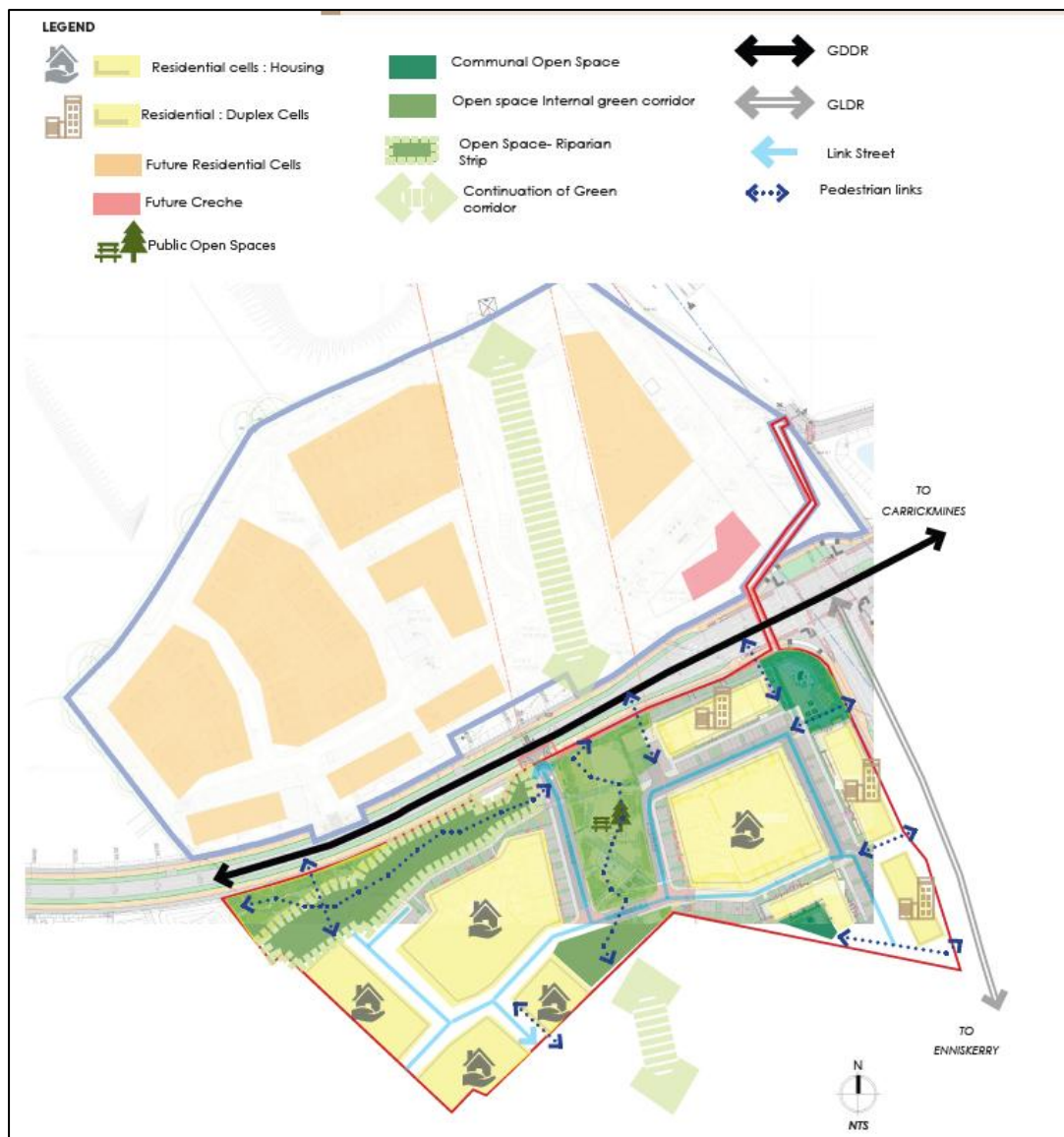


Figure 1.1: Schematic of the Masterplan Lands Including the Subject Site and Northern Lands (Indicative Only)

(Source: *Architectural and Urban Design Statement* by MCORM Architecture and Urban Design, 2025)

Kiltiernan – Glenamuck Local Area Plan 2025

The subject site is identified within the settlement boundary of the *Kiltiernan – Glenamuck Local Area Plan 2025* ('LAP'), as discussed in Section 7.1 below. Section 2.7.4 of the LAP identifies the subject site to be located within the Site Development Framework No. 4 (SDF₄), which will offer "opportunities to provide focal points, recognisable features and elements along Kiltiernan Road which will create a sense of identity and place" and that there "is also an opportunity to provide high quality urban realm and active street frontage onto Kiltiernan Road."

The subject site is also located within the Glenamuck North Character Area whereby it is an objective "to ensure that new development fronting onto the Kiltiernan Road delivers a high quality, built form and public realm with a strong sense of place and identity."

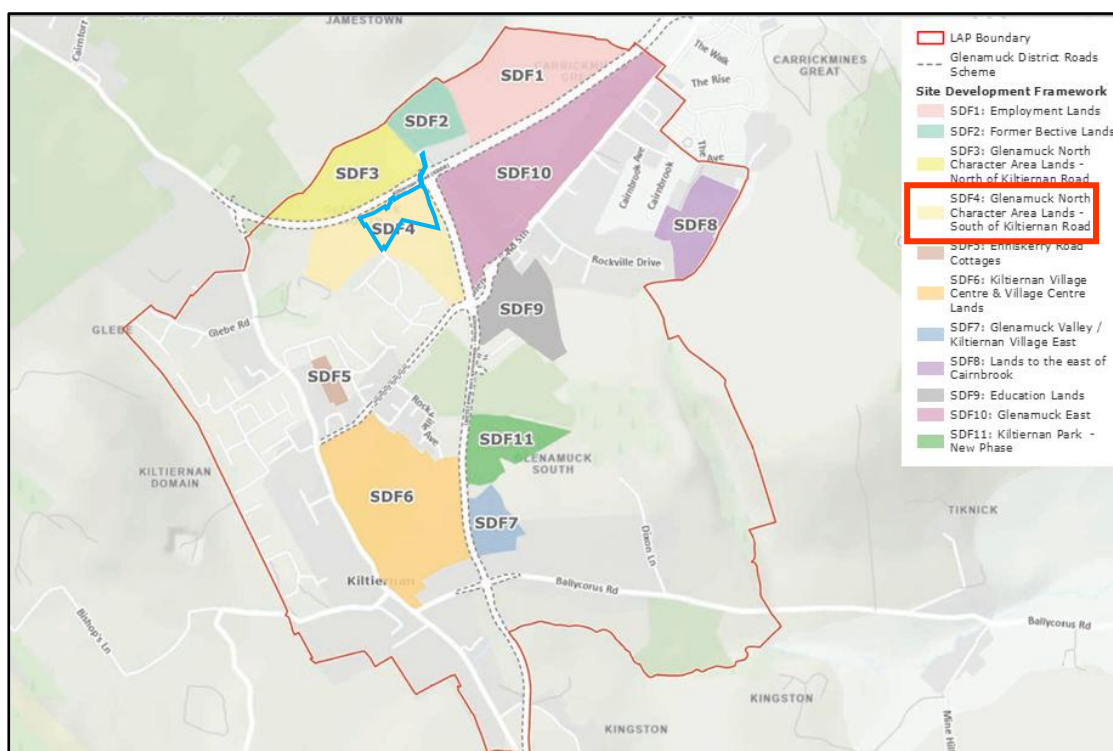


Figure 1.2: Site Development Frameworks Map (Indicative Site Location Outlined in Blue)

(Source: *Kiltiernan – Glenamuck Local Area Plan 2025*, Annotated by Thornton O'Connor Town Planning, 2025)

1.2 Summary of the Proposed Development

The proposed development can be summarised as follows:

"Durkan Glenamuck Developments Limited intend to apply for permission for a Large-Scale Residential Development at a site measuring c. 3.27 Ha in the townland of Glenamuck North in Kiltiernan, Dublin 18. The site is generally bounded by: the recently constructed Glenamuck District Distributor Road to the north (to be known as the Kiltiernan Road); the under construction Glenamuck Link Distributor Road to the east (to be known as the Kiltiernan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west.

Road works are proposed to the approved Glenamuck District Roads Scheme (ABP Ref. HA06D.303945) to provide access to the development from the Kiltiernan Road. The Kiltiernan Road access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of uncontrolled pedestrian and cyclist crossing across the side road junction. A surface water outfall pipe (225 mm) is also proposed to pass through land to the north of the site, including the future Kiltiernan Road. The total site area including the development site, road works and infrastructure works measures c. 3.32 Ha.

The development will principally consist of the construction of 135 No. residential units, comprising 65 No. houses (9 No. 2-bed units, 46 No. 3-bed units and 10 No. 4-bed units) and 70 No. duplex units (21 No. 1-bed units, 22 No. 2-bed units and 27 No. 3-bed units). The proposed development will principally range in height from 2 No. to 4 No. storeys.

The development also provides: car, bicycle and motorcycle parking spaces; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground."

1.3 Multi-Disciplinary Team

COMPANY NAME	DOCUMENTS PREPARED
Thornton O'Connor Town Planning No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89	<ul style="list-style-type: none"> • Planning Report and Statement of Consistency • Application Form 19 • Social Infrastructure Audit
McCossan O'Rourke Manning (MCORM) Architects No. 1 Grantham St Saint Kevin's Dublin 8	<ul style="list-style-type: none"> • Architectural Drawing Pack • Architectural Urban Design Statement • Scheule of Accommodation • Housing Quality Assessment • Lifecycle and Management Report
Roger Mullarkey & Associates Duncreevan Kilcock Co. Kildare	<ul style="list-style-type: none"> • Drainage and Water Services Drawings • Site Specific Flood Risk Assessment • Engineering Infrastructure Report and Stormwater Impact Assessment
Niall Montgomery & Partners (NMP) Landscape Architects No. 33 Rock Road Blackrock Co. Dublin	<ul style="list-style-type: none"> • Landscape Drawings • Landscape Design Statement
Meinhardt The Greenway, Block C Ardilaun Court, 112-114 St. Stephens Green, Dublin 2	<ul style="list-style-type: none"> • Traffic / Servicing Drawings • Traffic and Transport Assessment • Mobility Management Plan • Construction Management Plan
Arborists Associates Limited No. 94 Ballybawn Cottages Enniskerry Co. Wicklow	<ul style="list-style-type: none"> • Arboricultural Assessment • Arboricultural Plans

O'Connor Sutton Cronin Multidisciplinary Consulting Engineers (OCSC) No. 9 Prussia Street Stoneybatter Dublin D07KT57	<ul style="list-style-type: none"> Public Lighting Report (including Public Lighting Layout)
DNV 3D Core C Block 71 The Plaza Park West Dublin D12 F9TN	<ul style="list-style-type: none"> Ecological Impact Assessment Appropriate Assessment Screening Report Environmental Impact Assessment Screening Report Water Framework Directive Assessment Climate Change Impact Assessment Construction Environmental Management Plan Operational Waste Management Plan
Wave Dynamis Acoustic Consultants Unit 202 Nesta Business Centre Old Airport Road Santry Dublin	<ul style="list-style-type: none"> Acoustic Design Statement
Waterman Moylan Consulting Engineers Block 5 East Point Business Park Alfie Byrne Road Dublin D03 H3F4	<ul style="list-style-type: none"> Energy Statement
3D Design Bureau Adelphi House George's Street Upper Dún Laoghaire Co. Dublin A96 DX47	<ul style="list-style-type: none"> Verified Views and CGIs Daylight and Sunlight Assessment
PMCE No. 17 Greenmount House Greenmount Office Park Harold's Cross Dublin 6W D6W VX78	<ul style="list-style-type: none"> Quality Audit

1.4 Large-Scale Residential Development Application

The proposed scheme comprises 135 No. residential units. Thus, the proposed development is classified as a Large-Scale Residential Development ('LRD') as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021*:

"large-scale residential development" means a development that includes:

- (a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;*
- (b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;*
- (c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
- (d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c)." [Our Emphasis]*

The purpose of this Report is to provide an overview of the proposed development, demonstrating why the proposal is appropriate at the subject site and ultimately to seek the support of the Planning Authority for the principle of the development proposed, to allow the detailed design of the scheme to proceed.

1.5 Documents Discussed Throughout this Report

The following documents are discussed throughout this Report:

National

1. *Project Ireland 2040: The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2025);*
7. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024);*

8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007); and*
9. *Guidelines for Planning Authorities on Childcare Facilities (2001)*

Regional

10. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly.*

Local

11. *Kiltiernan – Glenamuck Local Area Plan 2025; and*
12. *Dún Laoghaire-Rathdown County Development Plan 2022-2028.*

It is through adherence to these documents and reference to their various tests, policies and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional and Local Planning guidance.

1.6 Format of this Report

This *Planning Report and Statement of Consistency* comprises the following sections:

Section	Content
1.0	Introduction
2.0	Site Location, Description, Context & Accessibility
3.0	Planning History
4.0	Detailed Description of Development
5.0	Statement of Consistency - National Policy
6.0	Statement of Consistency - Regional Policy
7.0	Statement of Consistency - Local Policy
8.0	Conclusion

2.0 SITE LOCATION, DESCRIPTION, CONTEXT & ACCESSIBILITY

2.1 Site Location and Description

The site is generally bounded by: the recently constructed Glenamuck District Distributor Road (GDDR), now open as of 19th June 2025, to the north (to be known as the Kilternan Road); the under construction Glenamuck Link Distributor Road (GLDR), to the east (to be known as the Kilternan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west.

Glenamuck Road is located further to the south and Enniskerry Road is located further west of the subject site. Phase 1 of the Shaldon Grange Strategic Housing Development (permitted under ACP Ref. ABP-312214-21 and amended under DLRCC Reg. Ref. LRD24A/0718/WEB), which is currently under construction, is located to the north-west of the subject site and is to be known as 'Grange Oaks'. The location of the subject site and its immediate context is illustrated in Figure 2.1 below.

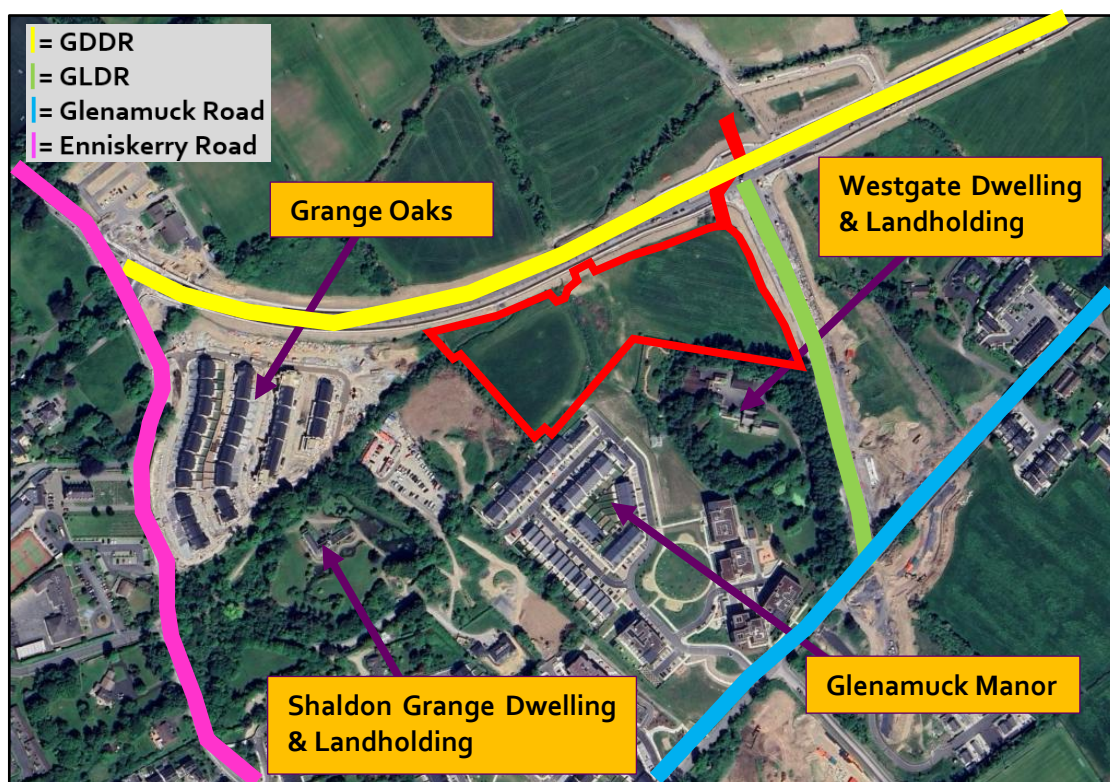


Figure 2.1: Aerial Photograph of the Subject Site (Indicatively Outlined in Red) and Immediate Environment

(Source: Google Earth (Imagery Date – May 2025), Annotated by Thornton O'Connor Town Planning, 2025)

The subject site is greenfield in nature with small patches of scrub scattered across the site. It gently slopes from west to east, with the lowest part of the site at the north-eastern corner.

Trees and hedgerows are located along the western boundary and eastern part of the southern boundary whilst the rear walls of dwellings within Glenamuck Manor are located along the western part of the southern boundary. Fencing associated with the GDDR & GLDR runs along the northern and eastern boundaries.

There is a dry ditch that traverses the site in a north-south direction. The Glenamuck Stream, which flows along part of the northern boundary of the site, is culverted as it flows under the new GDDR and returns to an open watercourse on land to the north-east of the subject site.

The above description of the subject site is illustrated on the aerial image in Figure 2.2 whilst Figure 2.3 & 2.4 provides street view images of the site.

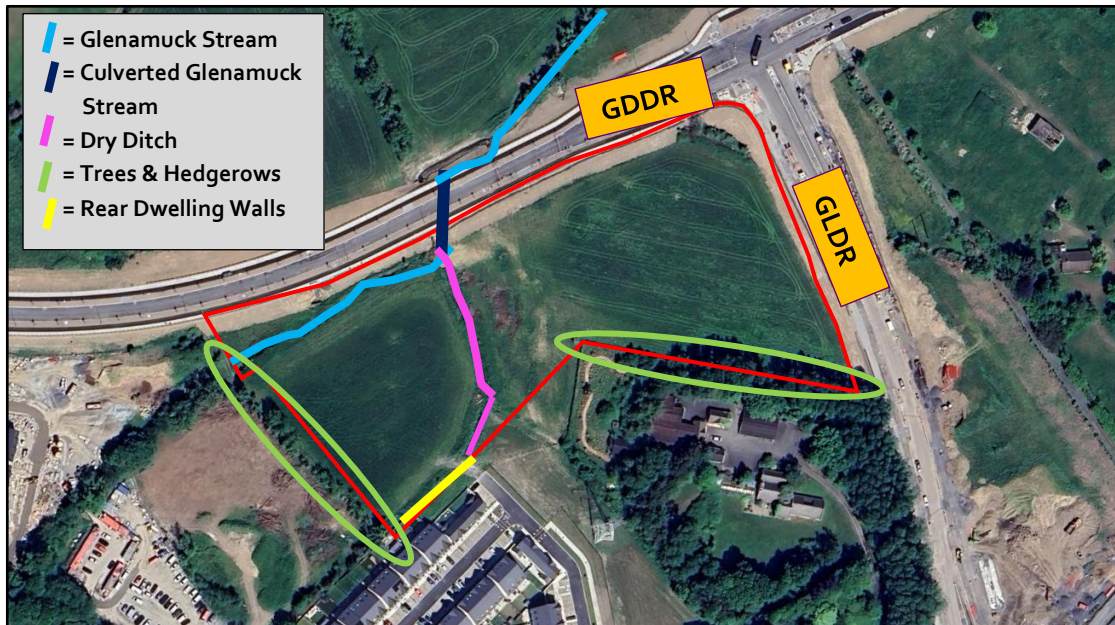


Figure 2.2: Boundary & On-Site Details of the Subject Site (Indicative Outline of the Subject Site in Red, Excluding Area for Road Junction and Drainage Infrastructure Works)

(Source: Google Earth (Imagery Date – May 2025), Annotated by Thornton O'Connor Town Planning, 2025)



Figure 2.3: Image of the Subject Site from the Recently Constructed GDDR

(Source: Google Maps Street View (Imagery Date – August 2025) Thornton O'Connor Town Planning, 2025)



Figure 2.4: Image of the Subject Site from the Recently Constructed GDDR

(Source: Google Maps Street View (Imagery Date – August 2025) Thornton O'Connor Town Planning, 2025)

There is an existing 220KVA power line that traverses the middle of the subject site in a north-easterly to south-westerly direction. The location of the power line is illustrated in Figure 2.5 and images of such is provided in Figure 2.6.



Figure 2.5: 220KV Power Lines Traversing the Subject Site – See Figure 2.6 for Street View Images (Indicative Outline of the Subject Site in Red, Excluding Area for Road Junction and Drainage Infrastructure Works)

(Source: Google Earth (Imagery Date – May 2025), Annotated by Thornton O'Connor Town Planning, 2025)

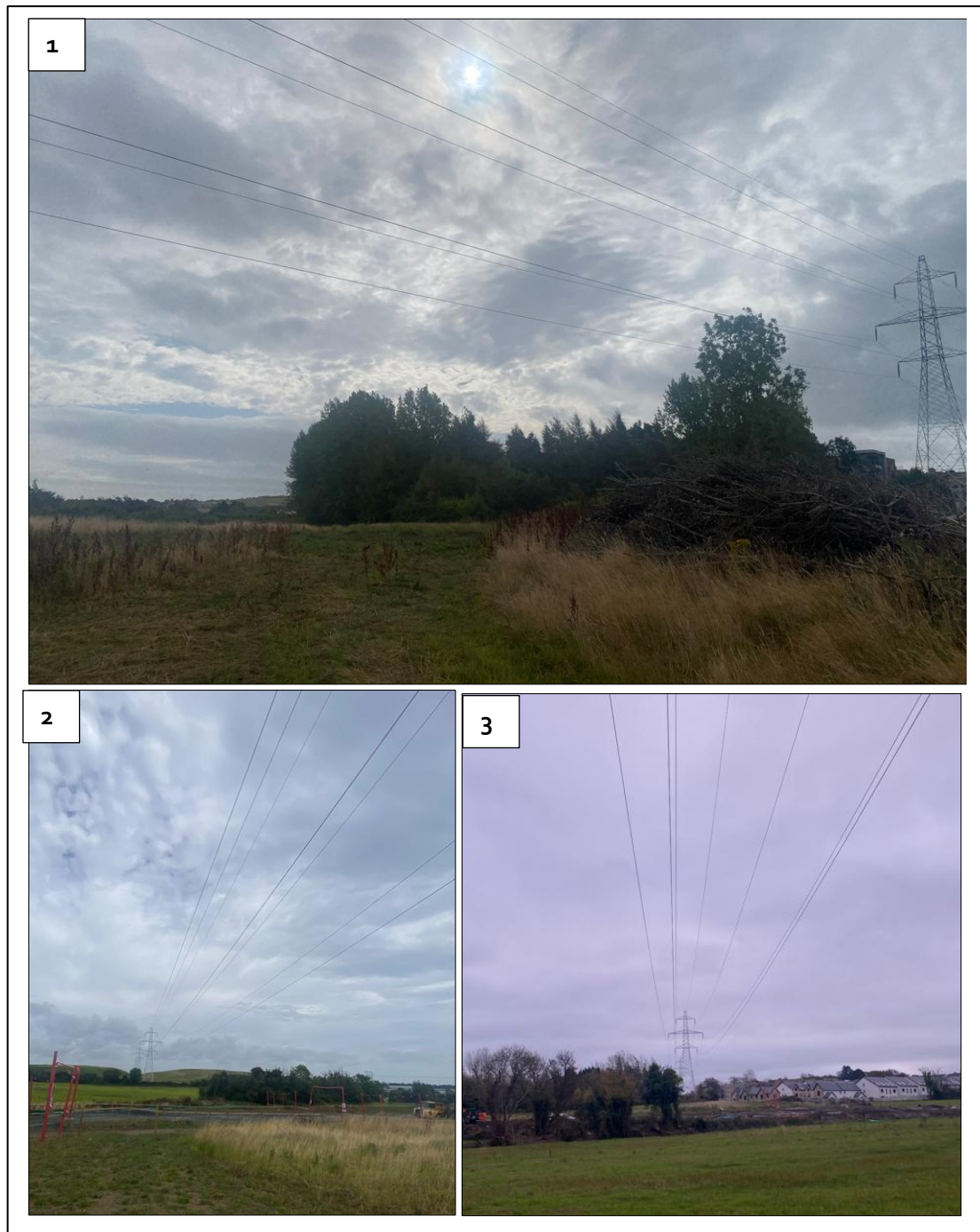


Figure 2.6: Images of the Overhead 220KV Power Line Traversing the Subject Site

(Source: Thornton O'Connor Town Planning, 2025)

2.3 Site Context

Kilternan Village

The subject site is located to the north-east of Kilternan Village which provides a number of services and facilities (Figure 2.7), such as the following:

- a pub/restaurant (The Golden Ball);
- a petrol filling station and shop (Circle K);

- 2 No. car garage and auto services (Green Auto Service and Optimal Suspension);
- 2 No. primary schools (Kiltarnan Church of Ireland National School and Our Lady of the Wayside National School);
- Further educational facility (Kiltarnan Adult Education Centre);
- Creches (Tree House Pre School & Montessori, Copperbeech Montessori, Play and Learn Carrickmines & Links Childcare Kiltarnan Woods);
- sports facilities (Kiltarnan Parish Lawn Tennis Club, Stepside Golf Centre & Driving Range, De La Salle Palmerstown FC and Wayside Celtic Football Club, Old Wesley RFC Junior Grounds); and
- Religious services (Kiltarnan Parish Church and Our Lady of the Wayside Church).

A Large-Scale Residential Development (Reg. Ref. LRD24A/0597), which is known as Kiltarnan Village LRD and is located to the south of the subject site, was recently Granted Permission by Dún Laoghaire-Rathdown County Council. The Kiltarnan Village LRD scheme, which is currently under construction, will provide 483 No. residential units, a large quantum of public open space, and a new Neighbourhood Centre comprising an anchor retail, retail/commercial units, a restaurant, creche, café and a community facility. Of note, the proposed Neighbourhood Centre will provide Kiltarnan Village with additional services and facilities to cater for the growing population, including that of the subject development.

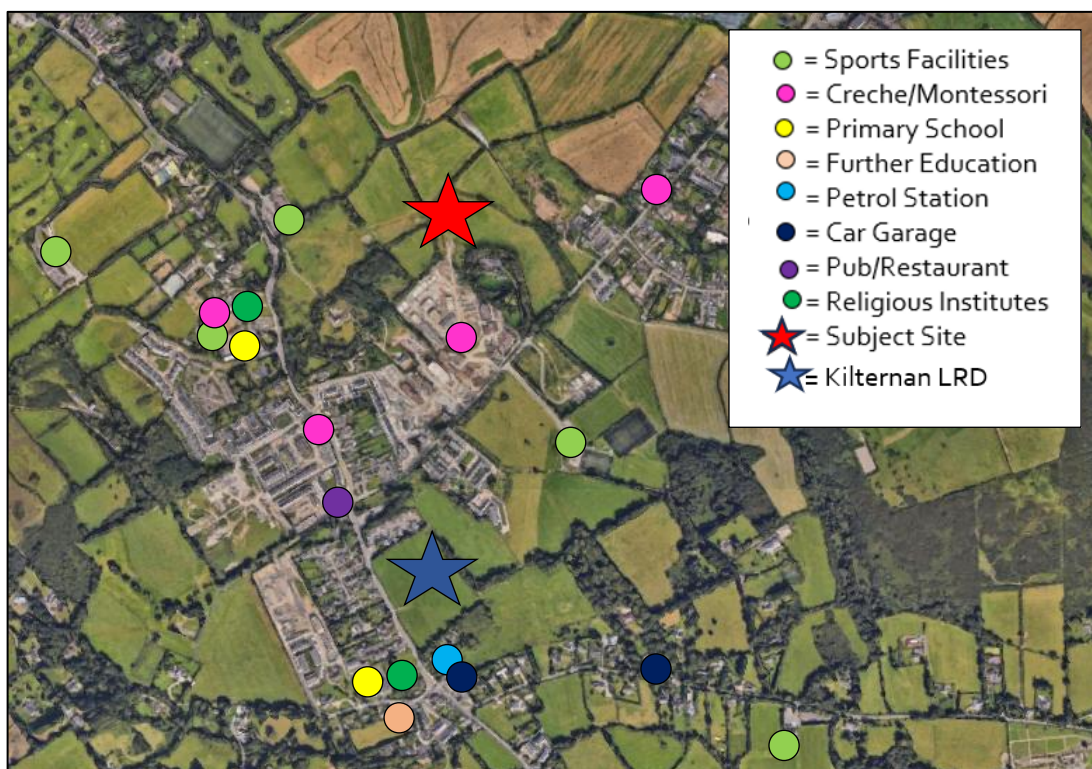


Figure 2.7: Services and Facilities Within and Adjoining Kiltarnan Village

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

Carrickmines Park

Carrickmines Park is located c. 700 metres (as the crow flies) to the north-east of the subject site and provides a number of services, including commercial, retail, medical, and a variety of cafes and restaurants. Notable facilities include: VHI 360 Health Centre, Woodies, TK Maxx, Harvey Norman, Currys PC World, and Halfdords. Residents will be able to walk to Carrickmines within c. 15-minutes (1.1km walking distance).

A Planning Application was permitted in September 2019 (Reg. Ref. D18A/0257 & ACP Ref. ABP-304396-19) and amended in January 2023 (DLRCC Reg. Ref. D21A/1115), for the provision of a Neighbourhood Centre (including retail and restaurant/café uses), retail warehouses, cinema, other leisure space, a creche, office space, car showroom, medical centre, linear park and 130 No. residential units.

The location of Carrickmines Park and the permitted development mentioned above to the subject site is identified in Figure 2.8.

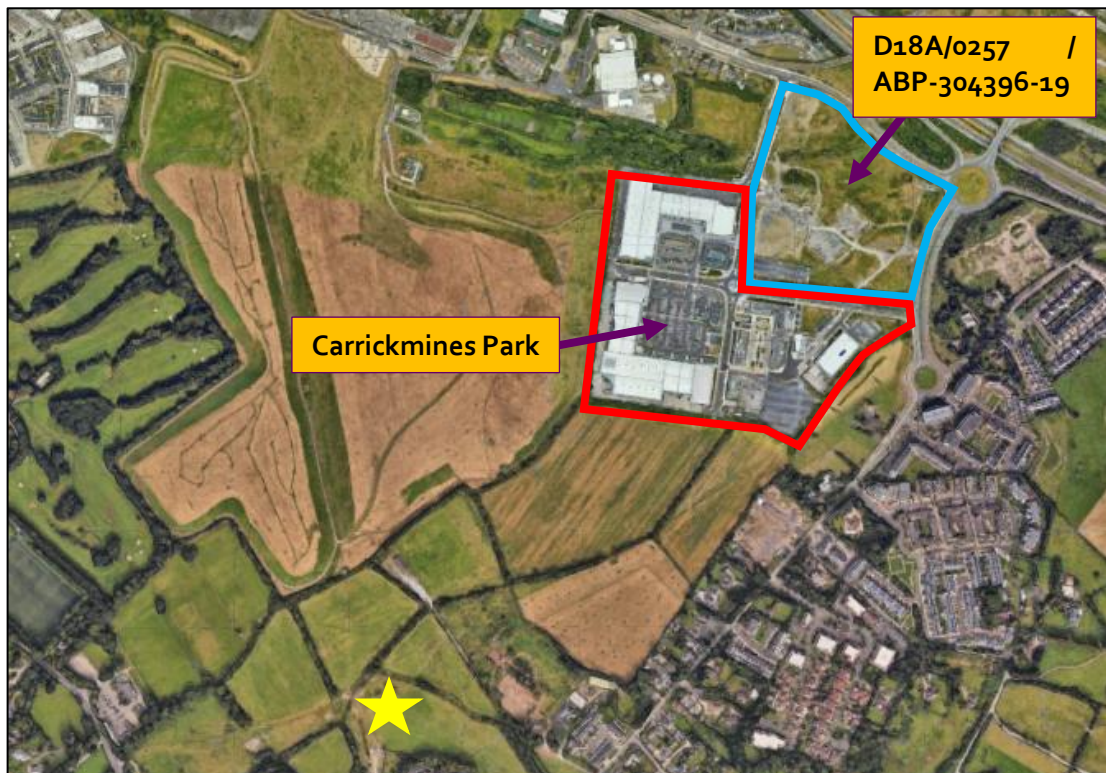


Figure 2.8: Indicative Location of the Subject Site (Identified by Yellow Star) Relative to Carrickmines Park and the Permitted Development Under Reg. Ref. D18/0258 / ACP Ref. ABP-304396-19, as Amended

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

Ballyogan Road

The subject site is located c. 1.2 km (as the crow flies) to services and facilities in Ballyogan, which include: Ballyogan Community Centre, Samuel Beckett Civic Campus (including Ballyogan Family Resource Centre, a GAA pitch, 2 No. soccer pitches, all-weather pitches, a skatepark and playground), a primary school (Gaelscoil Shliabh Rua), Ballyogan Parish Hall, a creche (Dimples Creche & Montessori), a gym (Project Fitness Dublin), and other commercial/retail services along Ballyogan Road.

Further along Ballyogan Road is Leopardstown Shopping Centre, which is located c. 1.6 km (as the crow flies) north of the subject site. The Shopping Centre includes retail and healthcare services such as Dunnes Stores, Lloyds Pharmacy and Leopardstown Primary Care, with Leopardstown Care Centre located further north of the Shopping Centre. Additional facilities located to the south of Leopardstown Shopping Centre and north of Ballyogan Road include Glencairn Medical Centre, Haven Pharmacy and Spar.

The location of the subject site to the abovementioned services and amenities are identified in Figure 2.9.

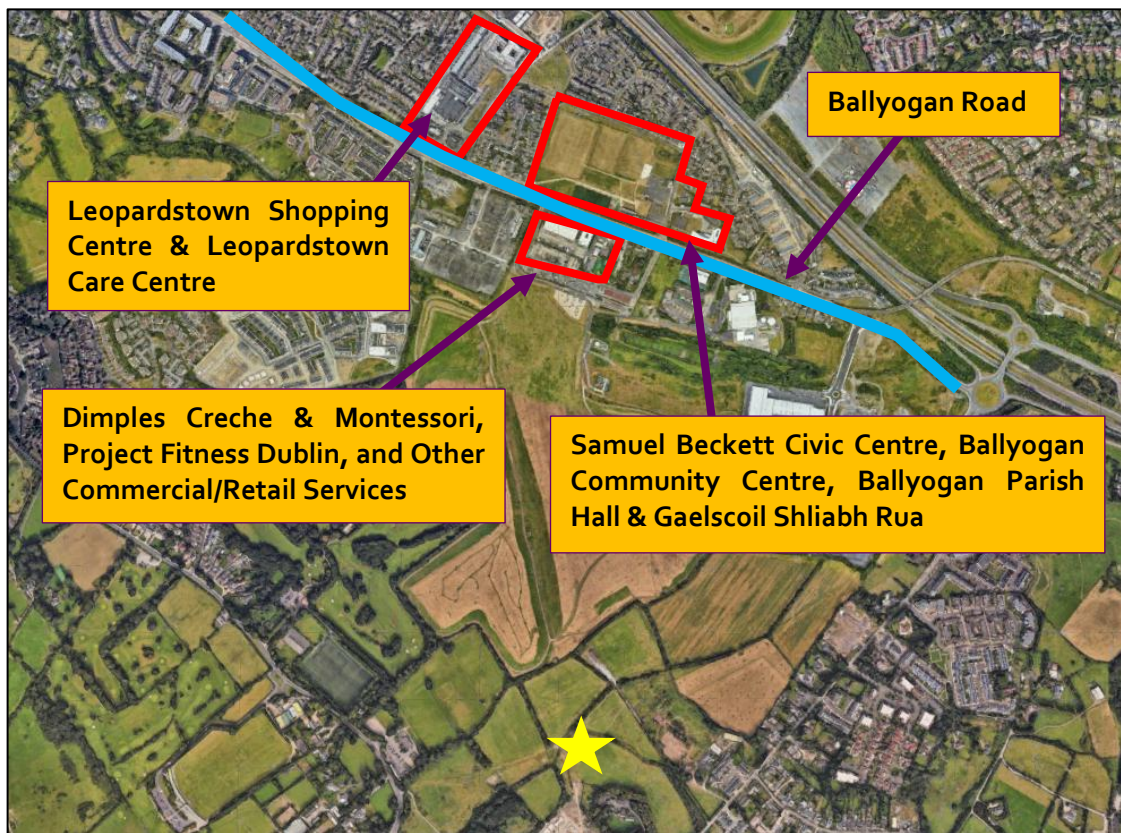


Figure 2.9: Indicative Location of the Subject Site (Identified by Yellow Star) Relative to Nearby Key Services and Amenities along Ballyogan Road

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

2.3 Site Accessibility

The subject site benefits from its proximate location to road infrastructure, such as Glenamuck Road, Enniskerry Road, the M50 motorway, the recently opened GDDR and the future GLDR.

2.3.1 Glenamuck District Roads Scheme (GDRS)

The Glenamuck District Roads Scheme (GDRS) relates to road proposals servicing the Carrickmines area between the Enniskerry Road and the Glenamuck Road. The scheme consists of The Glenamuck District Distributor Road (GDDR) and the Glenamuck Link Distributor Road (GLDR), which will connect the existing Enniskerry Road and the Glenamuck Road with the new link distributor road, connecting to the Ballycorus Road to the south, as illustrated in Figure 2.10.

The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Coimisiún Pleanála on 18th December 2019 (ACP Reg. Ref. HA06D.303945). According to the DLRCC website, BAM Civil Ltd were appointed as the contractor for the construction of the GDRS on 19th March 2024, and construction of the scheme began in Q2 2024. The GDDR opened on

19th June 2025, and the Glenamuck Link Distributor Road (GLDR) is scheduled for completion in Q1 2026.

The GDDR runs along the northern boundary of the subject site, while the GLDR will run along the eastern boundary. The subject development proposes a vehicular access point onto the GDDR and numerous pedestrian/cycle access points to both the GDDR & GLDR.



Figure 2.10: Layout of the Glenamuck District Roads Scheme with the Subject Site Indicatively Outlined in Red

(Source: *Glenamuck Urban Design DMURS Report*, Annotated by Thornton O'Connor Town Planning, 2025)

2.3.2 Bus Services

Rockville Drive bus stops (Nos. 3278 & 3285) are located east of the site along Glenamuck Road and are served by Go Ahead Ireland Bus service L26. There are bus stops located outside Kiltiernan National School on Enniskerry Road (Nos. 3482 & 3476) which are also located near the subject site and are served by Dublin Bus services the 44 & 118. Residents of the proposed development will be able to walk to the Kiltiernan National School bus stops within a c. 6-8-minute walk. Once the GLDR is operational, it is anticipated that residents will be able to walk to the Rockville Drive bus stops within c. 6-8 minutes.



Figure 2.11: Location of Proximate Bus Stops and Indicative Walking Times

(Source: BingMaps.ie, annotated by Thornton O'Connor Town Planning, 2025)

With respect to future transport connections within the area, BusConnects is the National Transport Authority's (NTA) programme to greatly improve bus and sustainable transport services. The aim of BusConnects is to deliver an enhanced bus system that is better for the city, its people and the environment. As can be seen in Figure 2.12, the BusConnects initiative proposes an 'Other City Bound Route', 'Peak Time Route' and a 'Local Route' along the Enniskerry Road. These routes will provide new and improved bus transport access to the subject site. As noted above, the L26 'Local Route' is now operational along Glenamuck Road.

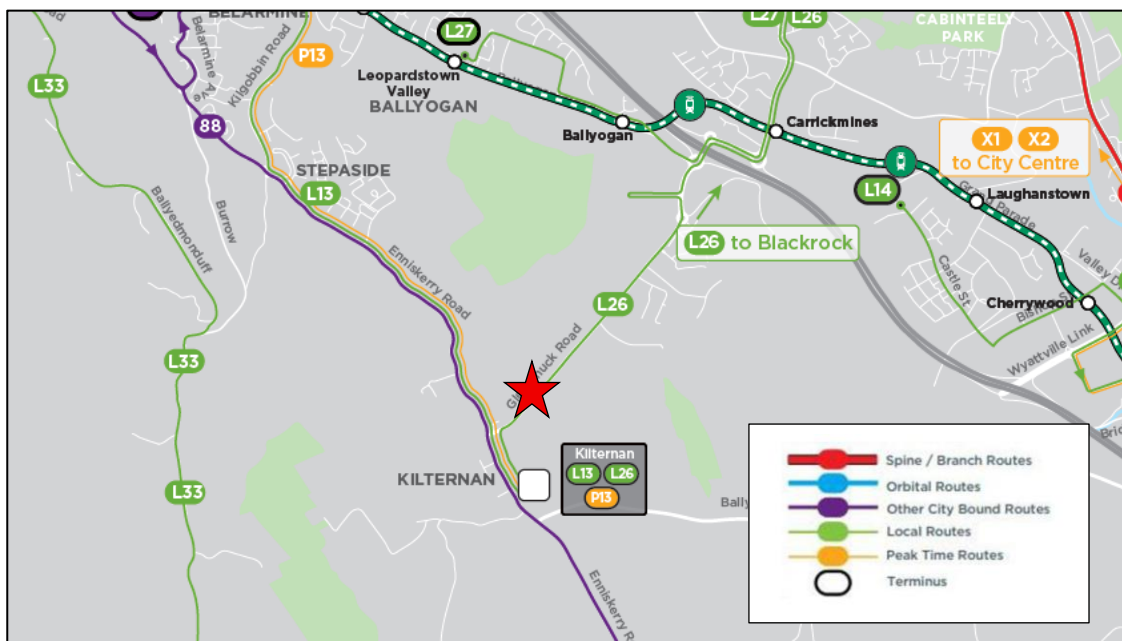


Figure 2.12: BusConnects Network in the Vicinity of the Subject Site (Indicative Location Denoted by a Red Star)

(Source: BusConnects.ie, Annotated By Thornton O'Connor Town Planning, 2025)

2.3.3 LUAS

The subject site is located to the south of Ballyogan Wood Luas stop, which is a c. 22-minute (c. 1.6km) walk from the subject site via the GDDR. The Green Line Luas provides frequent and easy access to a number of locations in and around Dublin City, as illustrated in Figure 2.13.

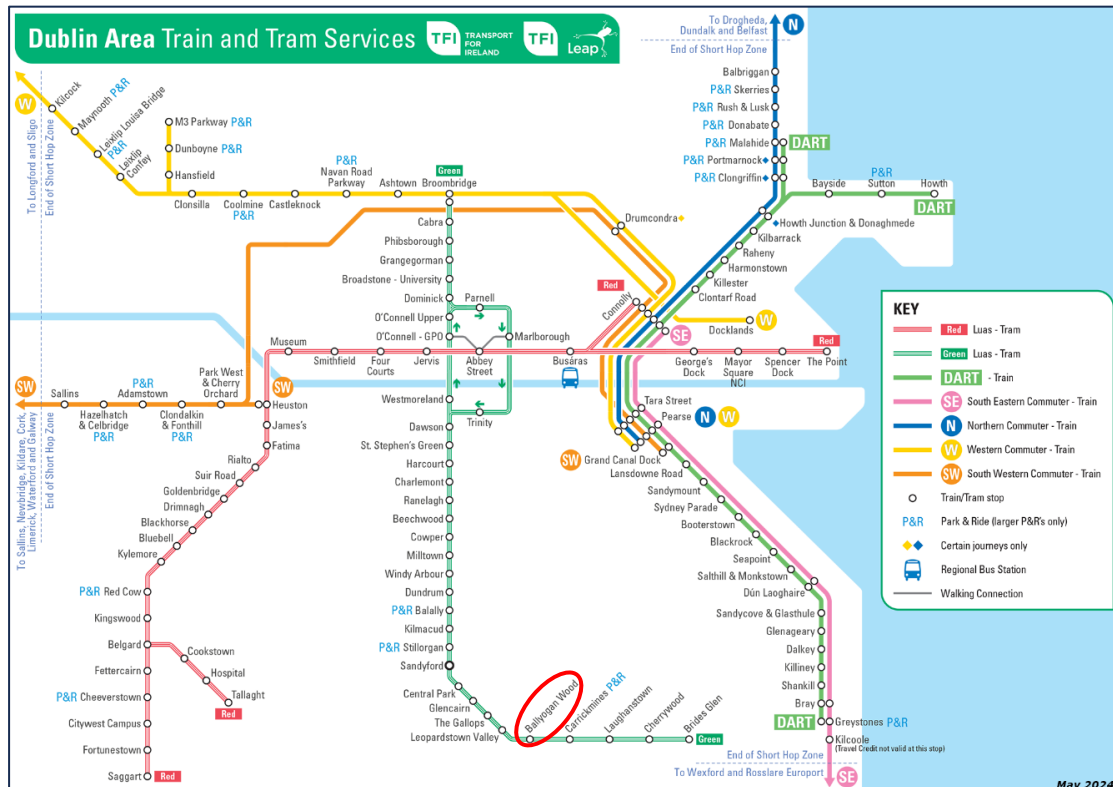


Figure 2.13: Dublin Area Train and Tram Services with Ballyogan Wood Luas Stop Circled in Red

(Source: www.transportforireland.ie, Annotated by Thornton O'Connor Town Planning, 2025)

2.3.4 Accessibility Summary

With access to public transport services, such as the LUAS and existing and future bus services, and having regard to the easy access to the M50 at Carrickmines (Exit 15), as well as the GDDR and the future GLDR, which will remove a large amount of through traffic from the village, this makes Kiltarnan Village a hub for activity and increases the area's potential for becoming a model suburban village.

3.0 PLANNING HISTORY

3.1 Overview of Relevant Planning History at the Subject Site

According to the Dun Laoghaire-Rathdown County Council Online Planning Database, there have been no previous planning applications made on the subject lands. However, we note that a small area of the subject was site was included as part of the red line boundary for the Glenamuck Manor Application (ACP Ref. TAO6D.303978) to facilitate a drainage connection to the north of the subject site.

3.2 Planning History in the Vicinity of the Subject Site

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

No.	Residential Development	Reg. Ref.
1.	Glenamuck Road/ Enniskerry Road SHD	ACP: TAO6D.306160
2.	Glenamuck Manor SHD	ACP: TAO6D.303978
3.	Glenamuck Manor Amendment Application	ACP: TR06D.312216
4.	Shaldon Grange SHD	ACP: TAO6D.307506
5.	Shaldon Grange SHD Relodge	ACP: TAO6D.312214
6.	Ashwood Farm SHD	ACP: TAO6D.313963
7.	Rockville – Residential Planning Applications	DLRCC: D17A/0793 DLRCC: D18A/0566 DLRCC: D20A/0015 DLRCC: D23A/0580
8.	Kilternan Village LRD	DLRCC: LRD24A/0597



Figure 3.1: 'SHD' Planning Applications in the Vicinity of the Subject Site (Orange=Indicative Subject Lands, Green=Granted, Red=Refused, Yellow=Decision Pending)

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

3.2.1 Glenamuck Road/Enniskerry Road SHD on Lands to the South of the Subject Site

The location of this application is denoted as number 1 on Figure 3.1 above.

ACP Reference:	TAo6D.3o616o
Location:	Glenamuck Road / Enniskerry Road, Kilternan, Dublin 18, D18 X5H2
Application Date:	13 th December 2019
Development Description:	Permission for a strategic housing development consisting of: 1) the demolition of 2 No. habitable dwellings on the site - 'Greenmount' (195 sq m) and 'Dun Óir' (345 sq m inclusive of ancillary buildings); 2) i) the construction of a 197 No. unit residential development comprising: 62 No. houses and 115 No. apartments in 7 No. blocks ranging in height from 3 to 4 No. storeys, and 20 No. duplex apartments in 4 No. three storey blocks; (ii) a 275 sq m crèche; (iii) the construction of the link access road between Enniskerry Road and Glenamuck Road required under the Kilternan/Glenamuck Local Area Plan 2013 including vehicular access points onto Enniskerry Road and Glenamuck Road.(www.kilternandoranplanning.com).
ACP Decision Date:	6 th April 2020
ACP Decision:	Grant Permission subject to 31 No. conditions

The permitted site layout plan is illustrated below in Figure 3.2.

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ACP Ref. TA06D.306160, Annotated by Thornton O'Connor Town Planning, 2025)

*"I am satisfied that the density proposed represents a sustainable and appropriate use of these zoned, serviced and strategically located lands. I consider that a net density of 45 units per ha can be accommodated on the lands without any significant adverse impacts. **Whilst the proposed density is marginally below the figure of 50 units per ha set out in the guidelines for transport corridors, I consider it appropriate having regard to the transitional character of the area.**" [Our Emphasis]*

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Figure 3.3: Image of the Completed Scheme

(Source: https://lda.ie/uploads/documents/Dun-%C3%93ir-Kilternan-Dublin-18_2024-10-31-101652_fjip.pdf)

3.2.2 'Glenamuck Manor' SHD on Lands to the South of the Subject Site

ACP Reference:	TAo6D.303978
Location:	Glenamuck Road South, Kilternan, Dublin 18
Application Date:	19 th March 2019
Development Description:	Permission for a strategic housing development consisting of 203 residential units within 12 No. blocks ranging in height from 3-6 No. storeys). The provision of a creche, a retail unit and a social/amenity facility. The development will include a new access from Glenamuck Road and the provision of access connection points, vehicular, cycle and pedestrian) to future adjacent development lands. www.glenamuckshd.ie
ACP Decision Date:	26 th June 2019
ACP Decision:	Grant Permission subject to 31 No. conditions

In their assessment of the application, the Planning Inspector stated the following on the subject schemes proposed density of 47.5 uph:

"I am satisfied that the densities proposed represent a sustainable and appropriate use of these zoned, serviced and strategically located lands. I am satisfied that a gross density of 47.5 units per ha can be accommodated on the land without any significant adverse impact due to the extensive open space provided for within the development, including the residual lands underneath the power lines which have been incorporated

into the landscape strategy for the site. **Whilst the proposed density is marginally below the figure of 50 units per ha set out in the guidelines for transport corridors, I consider it appropriate having regard to the transitional character of the area.**" [Our Emphasis]

The scheme proposed a mix of houses and apartments, ranging in height from 2 – 6 No. storeys in which the following assessment by Planning Inspector is noted:

"The development in my view makes an appropriate and sustainable use of the subject lands and any reduction in height as suggested by the Planning Authority would in my view result in an unsustainable density and inefficient use of these strategically located zoned and serviced lands. I am satisfied that the lands have the capacity to absorb a development of this scale and height without any adverse impacts." [Our Emphasis]

This SHD application was Granted Permission by An Coimisiún Pleanála on 26th June 2019. The permitted site layout plan is illustrated below.



Figure 3.4: Site Layout of the Glenamuck Manor SHD

(Source: Dún Laoghaire-Rathdown County Council, Online Planning Database - ACP Ref. TA06D.303978, Annotated by Thornton O'Connor Town Planning, 2025)

An amendment application (ACP Ref. TR06D.312216) was subsequently lodged, details of which are provided below.

ACP Reference:	TR06D.312216
Location:	Glenamuck Road South, Kilternan, Dublin 18
Application Date:	14 th December 2021
Development Description:	Alteration to previously approved ABP-303978-19 for revision to unit types (the total number of units remain the same), removal of

	retail/coffee dock, provision of 1 No. additional substation and the increase in car and bicycle parking.
ACP Decision Date:	12 th September 2022
ACP Decision:	Amend in accordance with Section 146B(3)(a) of the <i>Planning and Development Act 2000</i>

This SHD, as amended, has been constructed and is currently occupied. See Figure 3.5 below of part of the constructed development.



Figure 3.5: Image of the Constructed Scheme

(Source: <https://glenamuckmanor.com/>)

3.2.3 Shaldon Grange SHD on Lands to the West of the Subject Site ('Grange Oaks')

ACP Reference:	TAo6D.307506
Location:	Shaldon Grange, Kilternan, Dublin 18
Application Date:	8 th July 2020
Development Description:	Permission for a phased strategic housing development to consist of the provision of 130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments, ranging from three to four storeys in height. Vehicular access to the site will be from Enniskerry Road. www.landsatshaldongrangelilternanshd.com
ACP Decision Date:	22 nd October 2020
ABP Decision:	Refuse Permission

Planning permission was refused by An Coimisiún Pleanála on 22nd October 2020 for the following reason:

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

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

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

ACP Reference:	TAo6D.312214
Location:	Shaldon Grange, Kiltarnan, Dublin 18
Application Date:	15 th December 2021
Development Description:	Permission for a strategic housing development to consist of the provision of 130 No. residential units, comprising 55 No. three storey houses and 75 No. apartments , an associated site works. www.landsatshaldongrangeliltarnanshd.com
ACP Decision Date:	11 th April 2022
ACP Decision:	Grant Permission



Figure 3.6: Site Layout of Shaldon Grange Proposed Phase 1 SHD and CGI of Proposed Development

(Source: Extract from ACP Ref. TAo6D.312214 and www.landsatshaldongrangeliltarnanshd.com)

Regarding the proposed density of 43.9 uph and height of 3 – 4 No. storeys, the Planning Inspector noted the following:

*"I consider that **the site may have capacity to accommodate greater height and/or density than that proposed**, subject to appropriate assessments. Notwithstanding this opinion, I am generally satisfied with the proposed development in this regard."* [Our Emphasis]

The Shaldon Grange SHD application was Granted Permission by An Coimisiún Pleanála on 11th April 2022. The scheme is partially constructed with works still ongoing and is to be known as 'Grange Oaks'.

3.2.4 Ashwood Farm SHD – on Lands to the East of the Subject Site

ACP Reference:	TAo6D.313963
Location:	Ashwood Farm, Glenamuck Road South
Application Date:	1 st July 2023
Development Description:	305 No. residential units (289 No. BTR Apartments, 16 No. apartments) and a creche. www.ashwoodfarmshd.com
ACP Decision Date:	31 st July 2023
ACP Decision:	Refuse Permission

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

1. The density of 109 No. units per Hectare was considered too high in this location.
2. Heights of up to 7 No. storeys contravene the *Kilternan Local Area Plan 2013* and are out of character with the area.
3. The scheme does not comply with the phasing set out in the *Kilternan Local Area Plan 2013*.
4. Elements of the scheme do not provide a suitable high-quality design.

3.2.5 Residential Planning Applications at Rockville, on Lands to the South of the Subject Site

These lands are located to the south of Glenamuck Road and the subject site. Planning applications on these lands include the following:

Location:	Lands at Rockville House, Glenamuck Road South, Dublin 18, and Gatelodge (also known as Rockville Lodge)
DLRCC Reg. Ref.:	D17A/0793
Application Date:	6 th September 2017
Development Description:	This development will be the first phase of development on the residential zoned lands at Rockville House. Demolition of existing agricultural outbuildings on site; Retention of Rockville House to provide for 2 No. separate residential dwellings. Construction of a total of 49 No. dwellings consisting of 37 No. detached, semi-detached and terraced 2/3 storey houses and 12 No. apartments. The apartments will be provided within 1 no. four storey apartment block. Provision of 95 No. car parking spaces and a new vehicular access from Glenamuck Road South.
DLRCC Decision:	Grant Permission subject to 38 No. conditions
DLRCC Decision Date:	14 th December 2017
Final Grant Date:	25 th January 2018

DLRCC Reg. Ref.:	D18A/0566 amended by D18A/1191
Application Date:	13 th June 2018
Development Description:	Phase 2A of Rockville: Construction of 6 No. four-bed houses on a site south of Rockville House, with building heights of 2.5 No. storeys. The development will be accessed from the permitted local road within the adjoining the residential development to the north.
DLRCC Decision:	Grant Permission subject to 26 No. conditions (1 No. dwelling removed therefore permissions granted for 5 No. dwellings)
DLRCC Decision Date:	2 nd October 2018
Note:	Under DLR Reg. Reg. D18A/1191, an amendment application was submitted, which sought a change of house types only. Permission was granted by the Planning Authority on 19 th February 2019, which was subject to a Third Party Appeal to An Coimisiún Pleanála (ABP-303871-19). Permission was ultimately granted on 24 th June 2019 subject to 11 No. conditions.
DLRCC Reg. Ref.:	D20A/0015
Application Date:	13 th January 2020
Development Description:	Phase No. 2B of Rockville: The application site is located to the south-east of the Phase 1 residential development permitted under Reg. Ref.: D17A/0793. The construction of a four-storey apartment block comprising of 56 No. residential units. The apartment block includes a 50.6 sq m gym, a 126 sq m creche, and private, communal, and public open space. The proposed development will connect to the infrastructure and services in the permitted Phase 1 residential development to the north-west and provide for future connections to other adjoining lands.
DLRCC Decision:	Refuse Permission
DLRCC Decision Date:	6 th March 2020
ACP Reg. Ref.	ABP-306999-20
ACP Decision	Grant Permission subject to 19 No. conditions
ACP Decision Date:	22 nd September 2020 (This site has been purchased by the Applicant and an amendment application has been granted (27 th May 2024) on this site- See below: DLR Reg. Ref. D23A/0580)
DLRCC Reg. Ref.:	D23A/0580
Application Date:	7 th September 2023
Development Description:	In the Phase 2B scheme, permission was granted for the construction of a four storey apartment block comprising 56 No. apartments including 11 No. 1 beds, 39 No. 2 beds and 6 No. 3 beds. Permission was also granted for a gym and creche facility, private, communal and public open space, 72 No. surface parking spaces, cycle parking spaces, including bike stores, and bin stores. The permitted development connected into the infrastructure and services in the permitted Phase 1 residential development and provided for future connections to other adjoining lands. The subject amended application proposes the provision of 28 No. units comprising 12 No. two and three storey houses (9 No. 2 bedroom terraced houses and 3 No. 3 bedroom terraced houses) and 16 No. three and four storey duplex units in 3 No. blocks

	comprising 6 No. 1 bedroom units, 9 No. 2 bedroom units and 1 No. 3 bedroom unit. The amended scheme proposes 34 No. car-parking spaces, bicycle parking, bin and bike storage, communal and public open space, an attenuation tank, substation, and all associated works above and below ground. Grant Permission subject to 28 No. conditions.
DLRCC Decision:	24 th May 2024
DLRCC Decision Date:	27 th June 2024
Final Grant Date:	

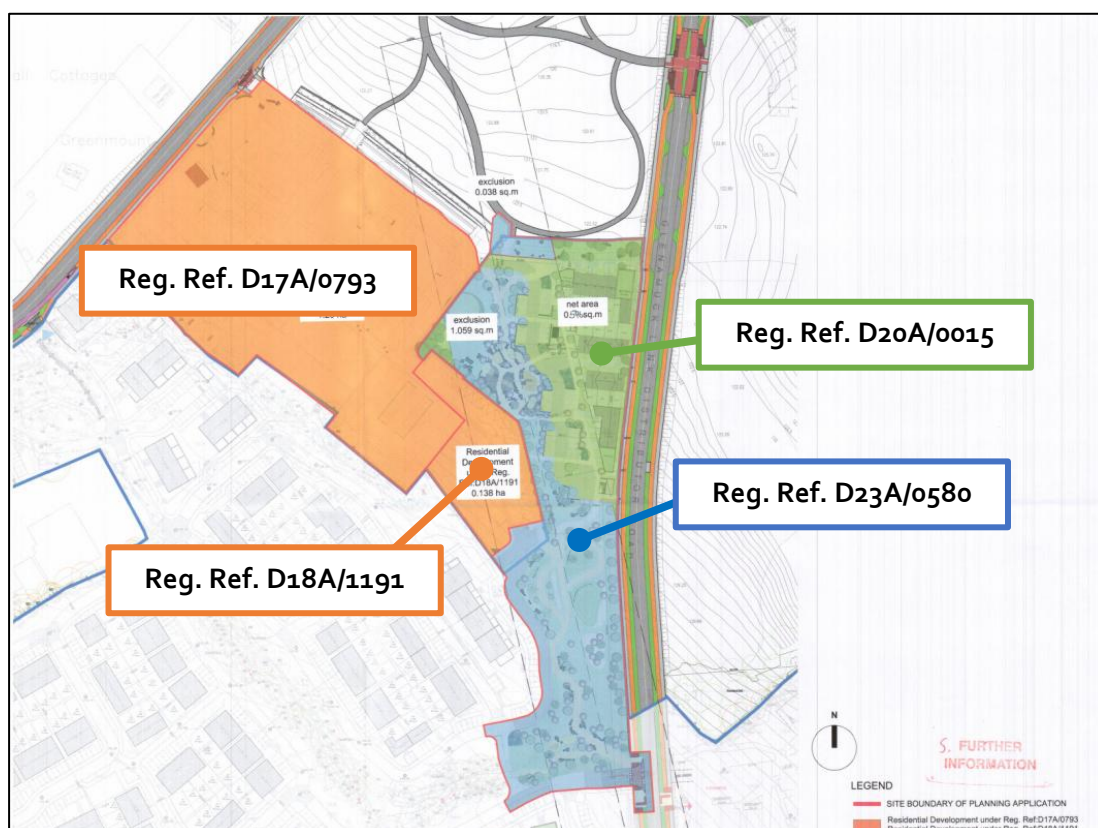


Figure 3.7: Overall Masterplan of Applications on the Lands

(Source: As submitted under DLRCC Reg. Ref. D23A/0580)

3.2.6 Kiltarnan Village LRD on Lands to the South of Glenamuck Road

Planning permission was originally granted for 83 No. residential units and non-residential floorspace (under DLRCC Reg. Ref. D23A/0616). The permitted development was included as 'Phase 1' in the Kiltarnan Village LRD application (DLRCC Reg. Ref. LRD24A/0597). Together, the entire Kiltarnan Village lands will provide 483 No. residential units, a large quantum of public open space, and a new Neighbourhood Centre comprising an anchor retail, retail/commercial units, a restaurant, creche, café and a community facility. Please find the application details below:

Reg. Ref:	D23A/0616
Location:	Lands at Wayside, Enniskerry Road, Kiltarnan, Dublin 18
Application Date:	27 th September 2023

Development Description:	Permission for a mixed-use development on a 3.9 Ha site, consisting of: 1) the construction of 91 No. residential units, including 72 No. houses (9 No. 2-bed, 43 No. 3-bed, and 20 No. 4-bed) and 19 No. duplex units (5 No. 1-bed, 9 No. 2-bed, and 5 No. 3-bed), ranging in height from 2 to 4 storeys; 2) a 405 sq m crèche and 356 sq m of retail/commercial floorspace ³ ; 3) road and infrastructure works, including new access points and modifications to c. 340m of Enniskerry Road, the provision of pedestrian and cyclist crossings, tie-ins at the Glenamuck Link Distributor Road (GLDR) access, and surface water and foul drainage connections via the Rockville development; and 4) all associated site works, including 178 No. car parking spaces (including EV and mobility spaces), bicycle and motorcycle parking, pedestrian links, hard and soft landscaping, boundary treatments, solar panels, sedum roofs, lighting, substations, and all other works above and below ground. The total site area, including drainage and roads works, measures c. 4.7 Ha, with a total gross floor area of c. 12,120 sq m.
DLR Decision:	Grant Permission subject to 32 No. conditions
Decision Date:	7 th June 2024
Final Grant Date:	11 th July 2024

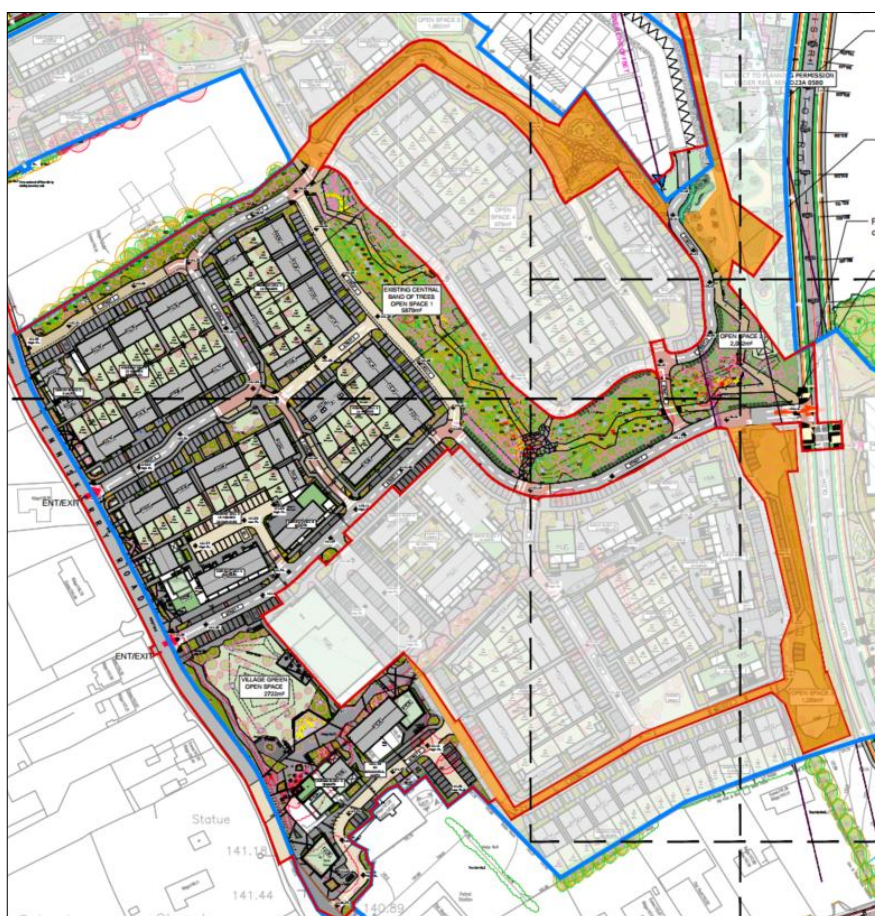


Figure 3.8: Proposed Site Plan Under DLR Reg. Ref. D23A/0616

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

³ Unit mix and non-residential floorspace amended at RFI Stage.

Reg. Ref:	LRD24A/0597
Location:	2 No. sites, measuring c. 14.2 Ha., which will be separated by the future Glenamuck Link Distributor Road (GLDR), Kilternan, Co. Dublin
Application Date:	5 th February 2025
Development Description:	Permission for a LRD on two sites totalling c. 14.2 Ha, separated by the future Glenamuck Link Distributor Road (GLDR). The development will consist of: 1) the demolition of c. 740 sq m of existing structures , including the derelict 'Rockville' dwelling and outbuildings (c. 573 sq m) and the former Kilternan Country Market (c. 167 sq m); 2) the construction of 487 No. residential units, comprising 196 No. houses, 201 No. duplex units, and 90 No. apartments, ranging from 2 to 4 storeys (some over podium/undercroft level); 3) a Neighbourhood Centre on the western site, including an anchor retail store (c. 1,310 sq m), retail/commercial space (c. 3,284 sq m), a restaurant (c. 182 sq m), a café (c. 326 sq m), a community facility (c. 332 sq m), and a 691 sq m crèche; 4) extensive road and infrastructure works, including new access points, tie-ins at the GLDR, connections to Enniskerry Road and Glenamuck Road, modifications to c. 340m of Enniskerry Road, pedestrian and cycle facilities, and drainage upgrades; and 5) all associated site works, including 854 No. car parking spaces (125 No. in undercroft, 729 No. at surface), motorcycle and bicycle parking, bin storage, solar panels, sedum roofs, boundary treatments, substations, public lighting, and telecommunications infrastructure at the Neighbourhood Centre. The development has a gross floor area of c. 60,504 sq m above ground, plus an undercroft/basement (c. 4,485 sq m). An Environmental Impact Assessment Report has been prepared and is available for inspection at the Planning Authority offices and online at www.kilternanvillageird.ie .
DLR Decision:	7 th March 2025
Decision Date:	Grant Permission ⁴
Final Grant Date:	Pending

⁴ Unit mix amended under Condition No. 2.

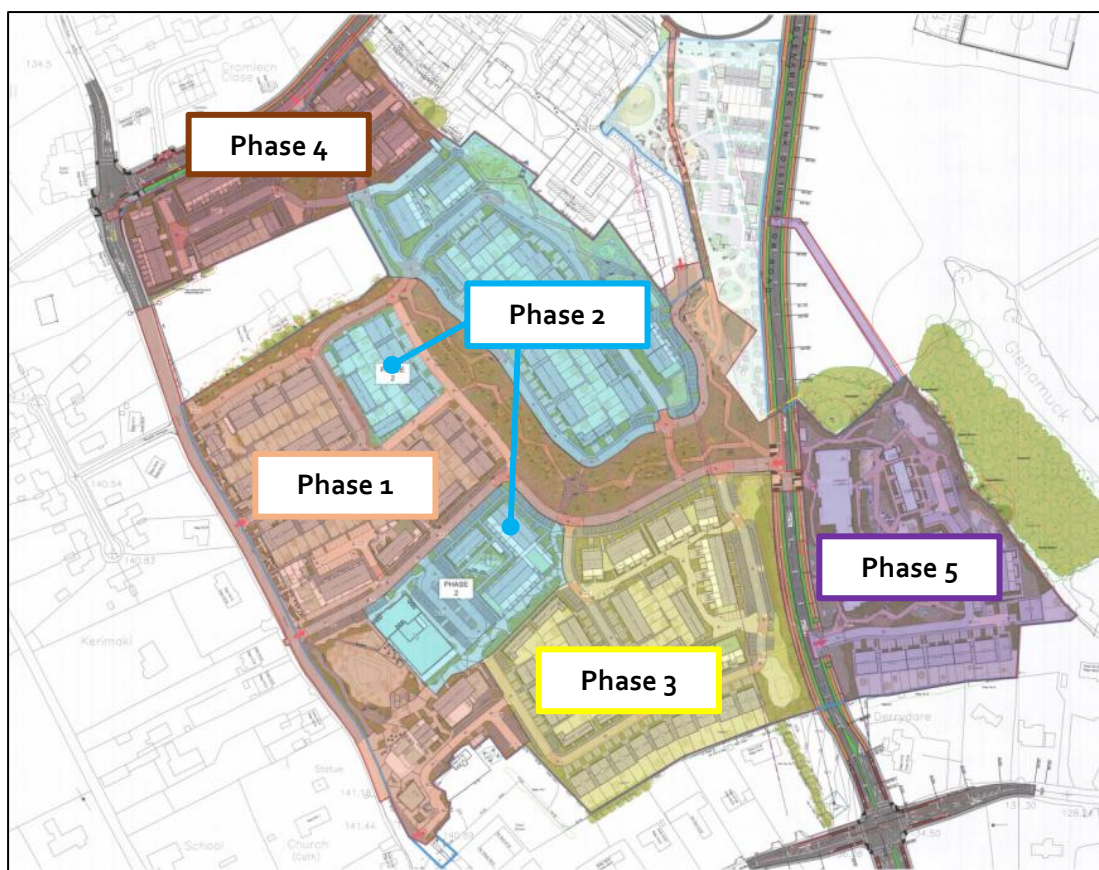


Figure 3.9: Phasing Plan for the Kilternan Village LRD

(Source: As submitted under DLRCC Reg. Ref. LRD24A/0597, Annotated by Thornton O'Connor Town Planning 2025)

3.3 Glenamuck District Roads Scheme – ACP Ref. HA06D.303945

The Glenamuck Distributor Roads Scheme (GDRS) was granted permission by An Coimisiún Pleanála on 18th December 2019 (ACP Reg. Ref. HA06D.303945). BAM Civil Limited was appointed as the contractor for the GDRS and works began in April 2024. The Glenamuck District Distributor Road (GDDR) opened on 19th June 2025, and the Glenamuck Link Distributor Road (GLDR) is scheduled for completion in Q1 2026.

The GDRS extent adjoining the site consists of the:

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



Figure 3.10: Overview of Permitted GDRS, Area of the Subject Site Indicatively Labelled

(Source: Dún Laoghaire-Rathdown County Council, Glenamuck District Road Scheme EIAR, annotated by Thornton O'Connor Town Planning, 2025)

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

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

We note that an entrance to the subject site along the GDDR was included as part of the GDRS application as illustrated in Figure 3.11. The proposed development seeks to deliver this junction as indicated in the GDRS application.

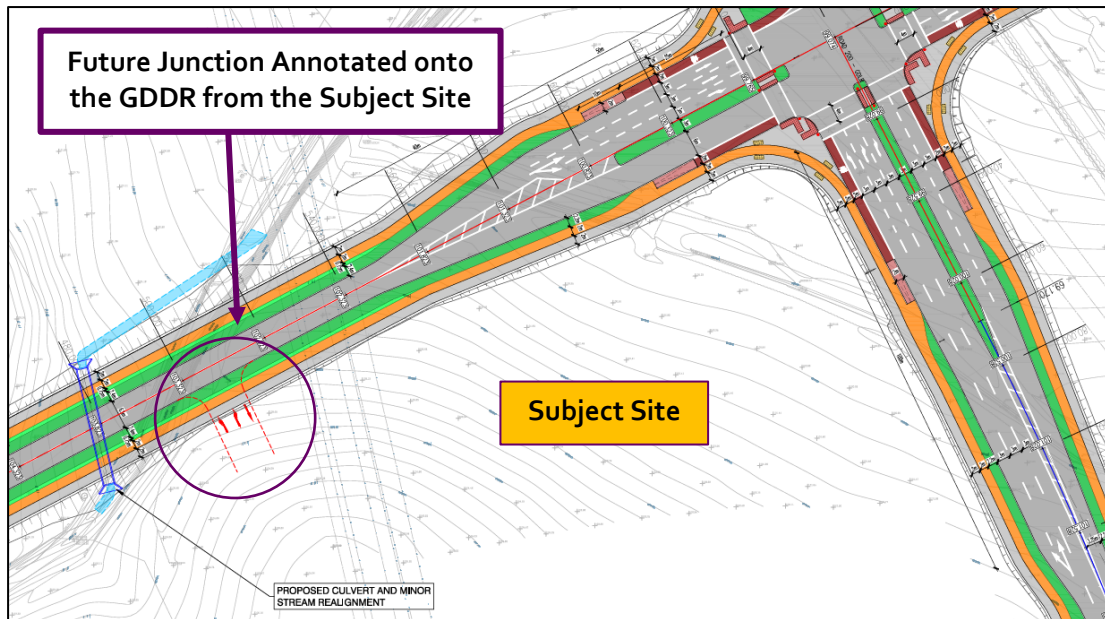


Figure 3.11: Future Junction Access Envisioned in the GDRS

(Source: As submitted under ACP Ref. HA06D.303945, annotated by Thornton O'Connor Town Planning, 2025)

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

Dun Laoghaire-Rathdown County Council is proposing to develop a public garden and recreational facilities comprising a children's play area, 'kickabout' area, water feature, footpaths, bench seating, tree planting, and ancillary works at Glenamuck Road South between 'Rockville' and the GLDR.

Dun Laoghaire-Rathdown Infrastructure & Climate Change Department received Part 8 planning approval (with amendments) at the Council Meeting on 14th June 2021.

This proposal for a public park is located at a site approximately 290 metres south of the subject site.



Figure 3.12: Proposed Development of Public Park and Playground at the Junction between Glenamuck Road South and the permitted Glenamuck Link Distributor Road (GLDR)

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

3.5 Summary of the Surrounding Development Context

The surrounding planning applications demonstrate an evolving urban context which has been supported by the planned creation of the Kilternan Village Centre and has involved the transition from detached houses to higher density schemes, which also provide for a range of housing types. This can be attributed to the proposed development of the GDRS, which allows for higher density residential and mixed-residential units in the Kilternan and Glenamuck area. It is our opinion that the development subject to this application will provide high quality residential units to serve the area on an underutilised site.

4.0 DESCRIPTION OF DEVELOPMENT

4.1 Summary Description of Development

The proposed development, as stated in the Statutory Notices, consists of the following:

"Durkan Glenamuck Developments Limited intend to apply for permission for a Large-Scale Residential Development at a site measuring c. 3.27 Ha in the townland of Glenamuck North in Kilternan, Dublin 18 The site is generally bounded by: the recently constructed Glenamuck District Distributor Road to the north (to be known as the Kilternan Road); the under construction Glenamuck Link Distributor Road to the east (to be known as the Kilternan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west.

Road works are proposed to the approved Glenamuck District Roads Scheme (ABP Ref. HA06D.303945) to provide access to the development from the Kilternan Road. The Kilternan Road access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of uncontrolled pedestrian and cyclist crossing across the side road junction. A surface water outfall pipe (225 mm) is also proposed to pass through land to the north of the site, including the future Kilternan Road. The total site area including the development site, road works and infrastructure works measures c. 3.32 Ha.

The development will principally consist of the construction of 135 No. residential units, comprising 65 No. houses (9 No. 2-bed units, 46 No. 3-bed units and 10 No. 4-bed units) and 70 No. duplex units (21 No. 1-bed units, 22 No. 2-bed units and 27 No. 3-bed units). The proposed development will principally range in height from 2 No. to 4 No. storeys.

The development also provides: car, bicycle and motorcycle parking spaces; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground."



Figure 4.1: Computer-Generated Image (CGI) of the Proposed Development

(Source: 3D Design Bureau, 2025)

4.2 Key Site Statistics

Total Red line Site Area / Gross Site Area	3.32 Ha (33,230 sq m)
Net Site Area⁵	3 Ha (30,123 sq m) by removing the following areas from the gross site area: <ul style="list-style-type: none"> • Drainage works = 0.039 Ha (389 sq m) • Riparian corridor = 0.259 Ha (2,590 sq m) • Road junction = 0.013 Ha (128 sq m)
Proposed Gross Floor Area	14,232 sq m
No. of Residential Units	135 No. units (65 No. houses and 70 No. duplexes)
Unit Mix	21 No. 1-beds (15.6%) 31 No. 2-beds (23%) 73 No. 3-beds (54%) 10 No. 4-beds (7.4%)
Net Density	44.8 uph
Dual Aspect Units	100%
Public Open Space Required	4,519 sq m (15% of net site area)
Public Open Space Proposed (Including the Riparian Strip)	7,378 sq m (22.5% of site net area + the Riparian Strip)
Public Open Space Proposed (Excluding the Riparian Strip)	4,788 sq m (15.9% of net site area)
Communal Open Space Required	499 sq m
Communal Open Space Proposed	1,142 sq m
Height:	2-4 No. storeys
Car Parking:	199 No. spaces
Bicycle Parking:	186 No. spaces
Motorcycle Parking:	8 No. spaces

4.3 Unit Mix

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

"There are 135 dwelling units being proposed, 65 houses and 70 duplexes

Throughout the development there are 3 no. principal house types proposed. These vary in form and are terraced & semi-detached. The mix of dwelling type and size will facilitate lifetime housing, providing a variety of accommodation choices for households including singles, couples and families For example should older people need to down size at any stage, they can move within their own development into a small dwelling if and when their space requirements change. Similarly younger owners can trade up to larger units later in life as the need arises."

⁵ As calculated in accordance with the *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)*. See Section 5.7 for full details.

The mix of 1 No. to 4 No. bedroom units are provided in the following table:

Unit Types	House	Duplex	Total	Unit Mix
1 Bed	-	21	21	15.6%
2 Bed	9	22	31	23%
3 Bed	46	27	73	54%
4 Bed	10	-	10	7.4%
Total	65	70	135	100%

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

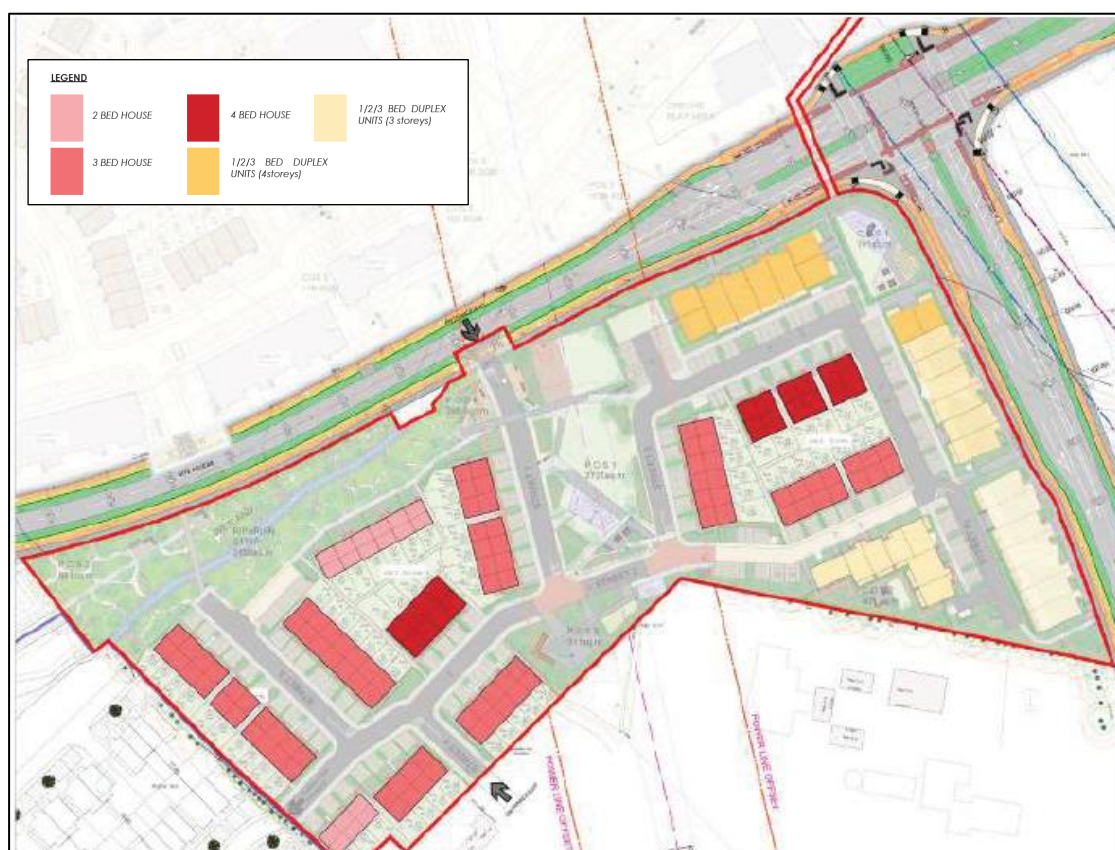


Figure 4.2: Plan Illustrating the Variety of Units Proposed in the Subject Scheme

(Source: MCORM Architecture, 2025)

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

4.4 Residential Design & Layout

In relation to the site layout, the scheme has taken advantage of the site's frontage onto the GDDR to the north and the GLDR to the east by providing the duplex units along the eastern boundary and the eastern extent of the northern boundary. Public open space will also front the remaining northern boundary.

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

In relation to materials and finishes, Section 4.5 of the *Architectural and Urban Design Statement* prepared by MCORM Architecture includes the following details:

"The scheme will consist of 2 shades of clay bricks together with pale and dark render. This complementary materials pallet is employed as a coherent family of materials that will run across the subject site

High quality light and dark grey brick elevations align with current developments that are being built in the area, notwithstanding the delivery of a new neighbourhood with its own character.

A varied built character will be achieved by using a combination of brick and render throughout.

The strong distinctiveness of the scheme's higher density edges is reinforced with the design employed on the duplex block facades."

Figure 4.3 illustrates the palette of materials to be used:

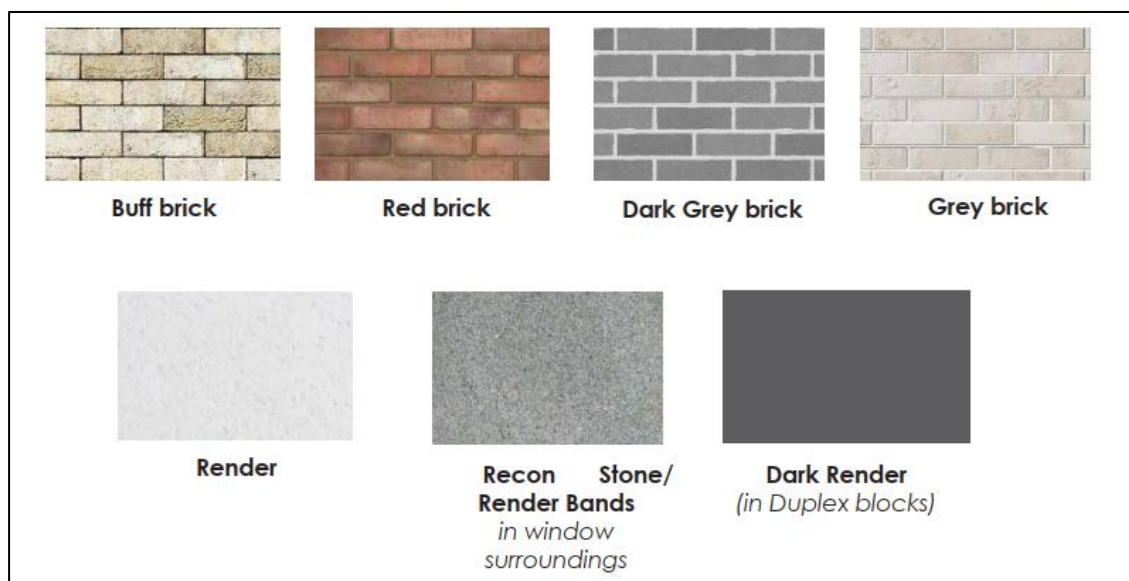


Figure 4.3: Proposed Palette of Materials for the Scheme

(Source: MCORM Architecture, 2025)

4.5 Height & Massing

The residential units on site predominately range in height from 2 No. to 4 No. storeys. All the houses are 2 No. storeys and the duplex buildings range between 3 No. storeys and 4 No. storeys with a single storey bin and bike store in close proximity to Duplex Block A and a bin and bike store built into the remaining duplex buildings at ground floor level. The location of the duplex units has been strategically located to the northeast and east of the site (Figure

4.2) given its frontage onto the GLDR and the GDDR and associated ability to absorb additional height.

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

4.6 Access Points and Connectivity

The development proposes a primary vehicular access from the GDDR to the north and a secondary access from Glenamuck Manor to the south, with a possible future connection to the lands to the west indicated, shall development come forth on these lands (Shaldon Grange / Grange Oaks lands).

We note that an entrance to the subject site along the GDDR was included as part of the GDRS application (discussed in Section 3.3 above) as well as being noted in the *Kiltiernan – Glenamuck Local Area Plan 2025*. The proposed development seeks to deliver this junction as indicated in the GDRS application and the *LAP*.

A key objective of the scheme is to reduce car dependency by providing high quality pedestrian and cycle networks. The enhancement and provision of permeable connections between the site (Figure 4.5) and the GDDR, GLDR, and Glenamuck Manor will make a positive contribution to the community.

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

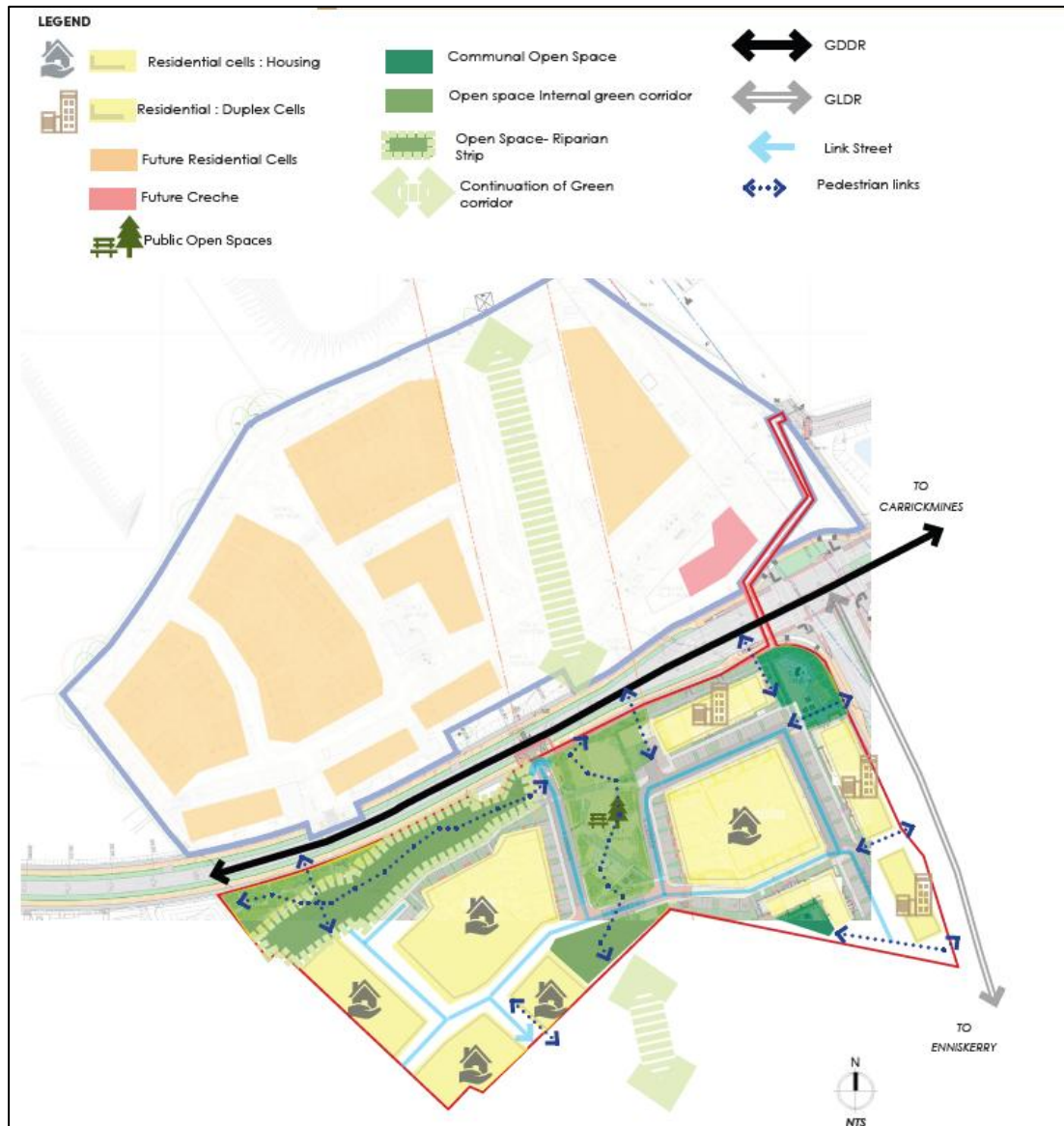


Figure 4.5: Movement Map In and Through the Site

(Source: *Architectural and Urban Design Statement* by MCORM Architects, 2025)

4.7 Landscaping and Open Spaces

A range of high-quality public and communal open spaces have been proposed to cater for the recreational and amenity requirements of future residents and for the wider community.

Public open space equating to 7,378 sq m (equivalent to 22.5% of the net site area + the Riparian Strip) has been provided across the site. The Riparian Strip around and inclusive of Glenamuck Stream, measuring 2,590 sq m, has been discounted from the useable public open space provision. The useable public open space is thus 4,788 sq m (equivalent to 15.9% of the net site area).

In addition, communal open space has been provided in two locations and totals 1,142 sq m.



Figure 4.6: Open Space Network Map

(Source: *Architectural and Urban Design Statement* by MCORM Architects, 2025)

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

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

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

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



Figure 4.7: CGI Aerial Image of the Proposed Development with Extensive Landscaping and Green Infrastructure

(Source: *Landscape Design Statement* by NMP Landscape Architects, 2025)

Please refer to the Landscape Pack for further details on landscaping and open space provision for the subject development.

5.0 STATEMENT OF CONSISTENCY - NATIONAL PLANNING POLICY

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

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework (2018);*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All–a New Housing Plan for Ireland (2021);*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2025);*
7. *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024);*
8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
9. *Guidelines for Planning Authorities on Childcare Facilities (2001).*

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

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

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

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

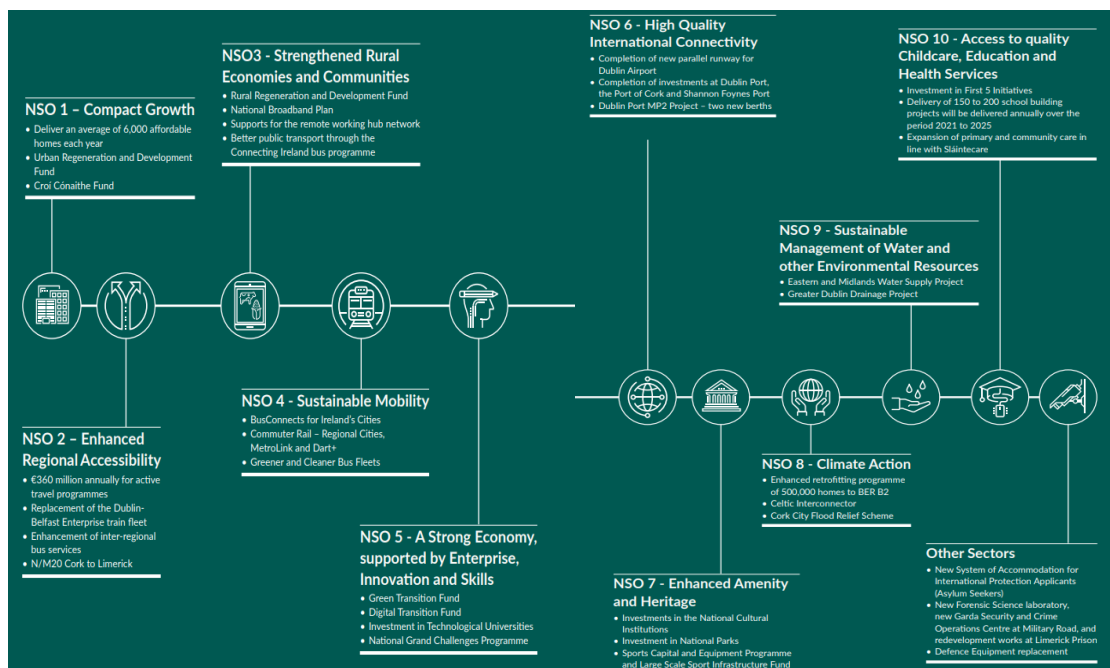


Figure 5.1: Major Investments – National Strategic Outcomes

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

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

5.2 *Project Ireland 2040: National Planning Framework*

5.2.1 Introduction

Project Ireland 2040: National Planning Framework is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. It was published in February 2018 and has recently been revised under the *National Planning Framework First Revision (2025) ('NPF')*, which was approved by the Houses of the Oireachtas on 30th April 2025 and, accordingly, has now come into effect.

Under the *NPF*, the Irish Government has set out long term strategic goals for the Republic of Ireland. These goals are geared towards compact growth and the sustainable development of Ireland to accommodate an increased population of one million people by the year 2040.

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

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

The *NPF* expressly seeks the densification of sites close to public transport and services and facilities such as the subject site. National Policy Objective 45 states that it is an objective to:

"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development."

Section 6.6 of the *NPF* further calculates that:

*"To meet projected population and economic growth as well as increased household formation, annual **housing output will need to increase to approximately 50,000 homes per annum in the years to 2040** and will be subject to monitoring and review."*
[Our Emphasis]

To assist in the delivery of 50,000 additional homes annually, Section 6.6 of the *NPF* further states that Ireland's future homes will need to:

- ***"be located in places that can support sustainable development** - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change;*
- ***be delivered in our cities and larger towns (where large scale housing demand exists)**, where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run, and*
- *still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably."* [Our Emphasis]

The *NPF* augments the above, remarking:

"Well designed and located high and medium density housing will assist:

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure".*

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides a mix of dwelling unit types (houses and duplexes) ranging in size from 1 No. to 4 No. bedroom units. By providing a range of unit sizes and unit types, the scheme will cater for all household sizes and types, creating a sustainable community from first-time buyers to family houses to people trading down in the area.

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

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

5.2.2 National Strategic Outcomes and Objectives

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

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

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

Consistency with National Strategic Outcomes			
No.	Objective	How is it Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised site, which is appropriately zoned to provide residential development, north of Kilternan Village.	Yes
2:	Enhanced Regional Accessibility;	The existing bus services, which connect to Dublin City Centre, will be enhanced as part of Bus Connects, with the L26 bus route already operational as part of the Bus Connects programme. The nearby Ballyogan Wood Luas stop will also provide future residents with easy access to Dublin City Centre where there is a multitude of public transport options to elsewhere in the county and country.	Yes

3:	Strengthened Rural Economies and Communities;	N/A – Site is located within the urban area.	N/A
4:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
5:	Sustainable Mobility;	Promoting active and sustainable transport due to the provision of permeable pedestrian and cycle links through the site and proximity of public transport (incl. the LUAS, bus routes and future Bus Connects links).	Yes
6:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The proposed 135 No. new residential dwellings will introduce a large new consumer base to support the existing commercial, retail, and childcare services in the area, creating a stronger and more vibrant community and economy in Kilternan and Carrickmines.	Yes
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents with the provision of 1,142 sq m communal open space, in addition to 4,788 sq m of useable public open space (7,378 sq m of public open space including the Riparian Strip). The scheme provides significantly in excess of the minimum public and communal open space requirements and this, in conjunction the pedestrian/cycle links provided through the site, will enhance the amenity of the Glenamuck and Kilternan area.	Yes
8:	Transition to a Carbon Neutral and Climate Resilient Society;	Sustainable modes of transport are encouraged through the pedestrian and cycle links to the surrounding area and the provision of bicycle parking. Green roofs and SUDS infrastructure has been included within the design of the subject scheme and the scheme will achieve a high energy rating and compliance with building standards.	Yes
9:	Sustainable Management of Environmental Resources; and	Sustainable modes of transport are encouraged, and sustainable management of water use and waste output is proposed.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	The subject scheme, as demonstrated in the accompanying <i>Social Infrastructure Audit</i> , benefits from its close proximity to a wide variety of existing services including schools such as Kilternan Church of Ireland National School, Our Lady of the Wayside National School and Kilternan Adult Education Centre in Kilternan Village.	Yes

		A creche will be provided as part of the adjoining northern lands which will be subject to a separate application lodged soon after this application. The creche has been designed and sized to cater for the northern lands and subject lands.	
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5.2.3 National Policy Objective

A number of key National Policy Objectives (NPOs) are outlined in the *NPF* in order to successfully achieve the 10 No. Strategic Outcomes outlined above.

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

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Suitable Location for Increased Housing Stock at an Appropriate Scale, Massing & Design; and
- Sustainable Modes of Transport.

The development proposed herein is wholly supported by, and supportive of, the foregoing NPOs. As a high-density housing development, it seeks to sustainably and efficiently use underutilised land within the existing Dublin settlement, integrating with established public transport and within walking distance of the existing urban village of Kilternan, Ballyogan as well as Carrickmines Park.

5.2.3.1 Population Growth and Employment

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

- **NPO 4** – “A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”
- **NPO 7** – “Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”
- **NPO 8** – “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 and ensure compact and sequential patterns of growth.”
- **NPO 13** – “Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”

- **NPO 16** – “To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.” [see Table 4.1 from the NPF below]

Table 4.1 Ireland 2040: Targeted Pattern of City Population Growth					
City	Population 2022	2018 NPF	Population Growth to 2040 ²⁰		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000

Figure 5.2: Targeted Population Growth for Dublin City and Suburbs

(Source: *Project Ireland 2040: National Planning Framework First Revision (2025)*)

- **NPO 42** – “To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.”
- **NPO 41** – “Prioritise the alignment of targeted and planned population and employment growth with investment in:
 - A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;
 - The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;
 - The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and
 - Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.”

The development will facilitate the projected growth in population and persons in employment in the Eastern and Midland Region.

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

As such the proposed development is consistent with the above NPOs which aim to provide for 50% of future population and employment growth with the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints.

The high-quality and large quantum of both public and communal amenity spaces proposed, will contribute to creating an attractive, liveable and well-designed urban place and will ensure the site is sustainably developed contributing towards the development of

cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

As noted above, a creche will be provided on lands north of the subject site as part of the masterplan of the two sites. These northern lands are subject to a separate application which will be lodged in due course; however, we note that the creche has been designed and sized to cater for the childcare demand across the masterplan area.

The proposed scheme involves the development of an underutilised site and therefore is fully in accordance with the preferred approach of the *NPF*. The development will encourage social interaction between the residents of the scheme as a result of the high-quality open spaces which include *inter alia*; play areas, seating arrangements and walkways, creating a strong sense of community. The proposed development is consistent with the NPOs set out within this Section.

5.2.3.2 Current Trends in Tenure and Household Formation in Ireland

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

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

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

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

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

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

The subject scheme represents proper planning and sustainable development as the site is an underutilised site, located in proximity to an existing village and the future residents of the scheme will benefit from the site's close proximity to public transport, employment, and services.

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

5.2.3.3 Suitable Location for Increased Housing Stock of an Appropriate Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the delivery of housing in appropriate and accessible locations that can support an increased population. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **NPO 20** – *"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."*
- **NPO 22** – *"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."*
- **NPO 43** – *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*
- **NPO 45** – *"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development."*

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the local area, particularly due to the scheme's high-quality design, siting, layout and mix of dwellings. It is considered that the scheme's design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

In line with NPO 22, the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, *Apartment Guidelines*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities, 2007* all set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 45, providing an increase in height and density on a small portion of the subject site within an existing settlement, whilst still respecting the context in which it is being provided, which is therefore in accordance with NPO 43.

5.2.3.4 Sustainable Modes of Transport

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

- **NPO 37** – *“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.”*

The subject site is proximate to several important transport facilities in the vicinity. The Ballyogan Wood LUAS stop is located approximately 1.6 kilometres (approx. 22-minutes walking distance) to the north-east. Access to the M50 Carrickmines (Exit 15) is located approximately 1.5 kilometres (approx. 3-minute drive) from the subject site.

Dublin Bus route Nos. 44 & 118 serves the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in Glasnevin. GoAhead route No. L26 serves the Glenamuck Road and provides reliable transport into Blackrock.

There are also several proposed new bus routes for Kilternan within the Bus Connects scheme, such as Routes No. 88, L13 and P13, which will all serve the Kilternan-Glenamuck area and offer transport links to Dublin City Centre and other suburbs and education facilities in the greater Dublin area.

With access to public transport services such as the LUAS and Dublin Bus along with the new Bus Connects scheme and having regard to the easy access to the M50 at Carrickmines (Exit 15) and the GDDR and nearly complete GLDR, which will reduce traffic passing through Kilternan, this makes the subject site a hub for activity. The subject site is thus located at a highly sustainable location for residential development.

5.2.3.5 Scale, Massing and Design

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

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

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the local area,

particularly due to the scheme's high-quality design, siting, layout and mix of dwellings. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

In line with NPO 13, the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, *Apartment Guidelines*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities, 2007* all set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33, providing an increase in height and density on a small portion of the subject site within an existing settlement, whilst still respecting the context in which it is being provided, which is therefore in accordance with NPO 35.

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

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

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

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

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

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

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

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

The subject scheme proposes the development of underutilised lands in the existing settlement of Kilternan-Glenamuck. The proposed development will contribute towards addressing the national housing crisis through the provision of 135 No. dwelling units, that will be available to purchase (with the exception of Part V units). The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 27 No. Part V units.

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

5.4 ***Housing for All– a New Housing Plan for Ireland, September 2021 (“Housing for All”)***

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

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

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

Section 3 of *Housing for All* states:

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

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

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

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

The subject scheme providing 135 No. residential units in a suitable location in the Kilternan–Glenamuck area, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 27 No. Part V units. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

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

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

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

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

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

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

Policy Objective BHS 1 - Increased Height of the *Development Plan* states the following:

"It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandymount UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre / 10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metres/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area (NPO 35, SPPR 1 & 3).

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

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

"It is a policy objective to promote and support proposed heights as set out in any approved statutory Local Area Plans and as set out for certain areas in this County

Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan area and Dun Laoghaire Urban Framework Plan area).

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

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

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

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

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

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

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

The site does not fall within the definition of BHS 1. We note that BHS 2 applies to lands within any 'statutory approved Local Area Plans'. The subject site is located within the confines of the *Kiltiernan – Glenamuck Local Area Plan 2025*; therefore we are of the opinion that BHS 3 cannot apply to the subject site as it relates only to 'residual areas'. A "residual area", as defined by the *Development Plan* in the context of height, is noted as being an area "**not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective, B, G or GB are termed residual suburban areas**" **[Our Emphasis]**. Thus, BHS 3 cannot apply to the subject site, as there is a Local Area Plan, namely the *Kiltiernan – Glenamuck Local Area Plan 2025*. It is therefore contended that the subject site falls within the definition of BHS 2.

To this effect, the building height standards in the *Kiltiernan – Glenamuck Local Area Plan 2025*, should be applied to the subject site. The subject site is specifically identified as 'Site Development Framework 4' (SDF₄), whereby heights of '2-4 storeys with potential for 5 at appropriate focal points along Kiltiernan Road' (GLDR) is applied. The subject scheme proposes

2 No. storeys houses and duplex buildings that range between 3 No. and 4 No. storeys, with tallest heights appropriately located fronting the GLDR and GDDR. Therefore, the scheme is fully compliant with both SDF₄ of the *LAP* and BHS 2 of the *Development Plan*.

In any case, if it was determined that BHS 3 was applicable to the subject site, the proposed development remain compliant as BHS 3 promotes a “*general building height of 3 to 4 storeys*”. Therefore, the scheme has been demonstrated to fully adhere to the relevant building height standards.

5.6 ***Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2025***

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments* in July 2025 (*Apartment Guidelines*). The *Apartment Guidelines* recognise the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect current and evolving household formation and housing demand.

The proposed development comprises a mix of apartments and houses, including 70 No. duplex units and 65 No. houses, which will provide a range of unit sizes for people seeking residential accommodation in Dublin. In addition, it is highlighted that the development provides 27 No. social housing units as required under Part V.

The *Apartment Guidelines* sets out Specific Planning Policy Requirements (‘SPPR’) and general requirements for apartment developments. Each SPPR and general requirement are set out below with a response provided for each in respect of compliance of the proposed development:

SPPR 1:

- (A) “*With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.*”
- (B) “*Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.*”

While there are no restrictions for the mix of unit sizes or types at the subject site, as set out in SPPR 1 above, the proposed development has had due regard to the existing mix of housing tenure in the local area and seeks to contribute to the mix of housing by providing 70 No. duplexes and 65 No. houses. Of the 135 No. units proposed, there will be 21 No. 1-bed units (15.6%), 31 No. 2-bed units (23%), 73 No. 3-bed units (54%) and 10 No. 4-bed units (7.4%). When the proposed houses are excluded from the unit mix, there are 70 No. duplexes provided, with 21 No. 1 bed units (30%), 22 No. 2 bed units (31%) and 27 No. 3 bed units (39%).

SPPR 2:

"The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- *Studio apartment (1 person) 32sq.m*
- ***1-bedroom apartment (2 persons) 45 sq.m***
- ***2 bedroom apartment (3 persons) 63 sq.m***
- ***2-bedroom apartment (4 persons) 73 sq.m***
- *3-bedroom apartment (4 persons) 76 sq. m*
- ***3-bedroom apartment (5 persons) 90 sq.m***

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing." **[Our Emphasis]**

All units meet, and in some cases, exceed the minimum apartment floor areas set out in SPPR 2, as demonstrated in the Housing & Apartment Quality Assessment prepared by MCORM Architects.

SPPR 3:

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

- (i) ***A minimum of 25% of units within a development shall be required to be dual aspect.*** Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
- (ii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects"* **[Our Emphasis]**

In the subject scheme, 100% of the duplexes will be dual aspect, significantly exceeding the minimum requirement set out in SPPR3 above. This demonstrates the high-quality design of the subject scheme.

SPPR 4:

"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality."

The ground floor of the duplex buildings provides a floor to ceiling height of 2.7 metres, in accordance with SPPR 4 of the Apartment Guidelines.

SPPR 5:

"There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core."

N/A.

SPPR 6:

"The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes."

As there is no specific requirement in the *Development Plan* for the subject site to provide communal, community and cultural facilities, the proposed development does not provide any of such uses. However, we note that the proposed development provides 4,788 sq m of useable public open space which will undoubtedly benefit the local community.

SPPR 7:

"There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process."

N/A – SPPR 7 applies to Shared Accommodation/Co-Living Development.

SPPR 8:

(A) *"(i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes.*

(ii) The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR. areas set out within this SPPR.

(iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required.

(B) *Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme."*

N/A – SPPR 8 applies to Purpose Built Student Accommodation.

Recommended Minimum Widths for the Main Living/Dining Rooms

The *Apartment Guidelines* outline a requirement for the minimum widths of the main living/dining rooms as follows:

Unit Type	Min. Living/Kitchen Room Width
Studio	4 m
One Bedroom	3.3 m
Two Bedroom (3 No. person)	3.6 m
Two Bedroom (4 No. person)	3.6 m
Three Bedroom (4 No. person)	3.8 m
Three Bedroom (5 No. person)	3.8 m

The proposed units have been designed in accordance with the standards for the minimum widths of the living/dining rooms, as detailed in the submitted floor plans enclosed and prepared by MCORM Architects.

Minimum Bedroom Floor Areas/Widths

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

Unit Type	Minimum Floor Area	Minimum Width
Studio	25 sq m	4 m
Single Bedroom	7.1 sq m	2.1 m
Double/ Twin Bedroom	11.4 sq m	2.8 m

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

Minimum Storage Space Requirements

The *Apartment Guidelines* outline a requirement for minimum storage space as follows:

Unit Type	Minimum Floor Area
Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedroom (4 No. person)	6 sq m
Three Bedroom (5 No. person)	9 sq m

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

Private Open Space

The *Apartment Guidelines* outline a requirement for private open space as follows:

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

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

Communal Open Space

The *Apartment Guidelines* outline the following standards for communal open space:

Unit Type	Communal Open Space Requirement Per Unit
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. Person)	6 sq m
Two Bedroom (4 No. Person)	7 sq m
Three Bedroom (4 No. Person)	7 sq m
Three Bedroom (5 No. Person)	9 sq m

Based on the composition of the proposed 70 No. duplexes (21 No. 1-bed units, 3 No. 2-bed [3-person] units, 19 No. 2-bed [4-person] units, and 27 No. 3-bed [5-person] units), the subject scheme has a requirement of 499 sq m of communal amenity space to meet the minimum standards outlined in the *Apartment Guidelines*.

The subject scheme includes 1,142 sq m of communal amenity space designed by NMP Landscape Architecture, which significantly exceeds the minimum requirement.

Car & Cycle Parking

The *Apartment Guidelines* states that "car parking ratios should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport" and refers to SPPR 3 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) for the maximum car parking rates.

Similarly, the *Apartment Guidelines* refer to SPPR 4 of the same document for minimum cycle parking requirements.

In this regard, please refer to the following Section for compliance with the maximum car parking standards and minimum cycle parking requirements.

As outlined above, it is clear that the proposed development complies fully with the SPPRs, and further requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments (2025).

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

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

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

SPPR 1 (Separation Distances):

"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms** at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

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

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

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

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

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

The approach to the design of the proposed development has been to protect and respect residential amenity, whilst aligning with the standard set by the Guidelines. In most cases throughout the development, the minimum separation of 16 metres has been exceeded.

We note that there are a few instances where the 16-metre separation distance is not achievable. In these instances, there are either no opposing upper floor windows, the opposing windows do not serve habitable rooms or windows with privacy measures are in place. The Guidelines allow such a relaxation on the 16-metre standard in scenarios where opposing windows do not serve habitable rooms and where suitable privacy measures are put in place, such as obscure glazing.

An example of where the 16-metre separation distance is not achieved is between the side elevation of House No. 06 and the rear elevation of House Nos. 07 & 08 where the closest separation distance is c. 8.5 metres. In this regard, we note that the upper floor windows along the side elevation of House No. 06 have obscure glazing to prevent overlooking into the upper floor rooms of House Nos. 07 & 08. Similarly, there is a separation distance of 9.9 metres between the side elevation of House No. 30 and the rear elevations of House Nos. 31 & 32; however, the upper floor windows of House No. 30 are obscured to prevent overlooking. The separation distance between the side elevations of Duplex Block B & C is c. 9.2-metres; however, the opposing windows in each block will be obscured to prevent overlooking.

Therefore, the proposed development complies with SPPR 1 of the *Compact Settlement Guidelines* and the scheme will enjoy a high level of amenity.

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

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

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

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open

space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

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

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

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

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

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

In all instances, the private open space provided for each house meets or exceeds the minimum standards.

SPPR 3 (Car Parking):

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

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

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

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

Therefore, the Guidelines set a maximum car parking rate of 2 No. spaces per dwelling. Based on the provision of 135 No. residential units, a maximum of 270 No. residential car parking spaces could be provided at the site. The scheme provides a total of 199 No. residential car parking spaces (1.47 No. spaces per unit) which is below the maximum standards and is considered acceptable in our opinion due to the proximate existing and proposed bus services and existing LUAS stop, all of which are within both walking/cycling distance of the subject site.

As set out above, the rate of provision does not exceed the maximum standards set by the Guidelines.

SPPR 4 (Cycle Parking and Storage):

"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided."*

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

The scheme provides 146 No. long stay parking spaces for the duplexes and 36 No. short stay spaces for the duplexes and houses. The proposed quantum exceeds the requirements set out in Dun Laoghaire-Rathdown County Councils *Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)*. The duplex long stay

spaces are provided in sheltered cycle stores. Long-stay spaces for the houses are either provided in the rear garden that has direct access provided, or within cycle stores provided to the front of the house. Visitor cycle parking in the form of Sheffield stands is provided in various locations throughout the site.

Policy and Objective 3.1 (Densities)

"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."

As identified in Figure 5.1 of the *Regional Spatial & Economic Strategy* by the Eastern & Midland Regional Assembly, and in the Census 2022 Interactive Map for 'Towns', the subject site is located in 'Dublin City & Suburbs'. There are 3 No. areas and density ranges for Dublin City & Suburbs and informed by this, we are of the opinion that the subject site is within a 'City – Suburban/Urban Extension' location, as detailed in Table 3.1 of the Guidelines:

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

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

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

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

The gross site area of the subject site is 3.32 Ha, however, in accordance with the above table from the *Compact Settlement Guidelines*, the following parcels of land have been excluded to

achieve the net site area and is discussed in more detail in the accompanying *Architectural and Urban Design Statement*:

- Riparian Strip – 0.259 Ha (2,590 sq m)
- Road Junction to GDDR – 0.013 Ha (128 sq m)
- Drainage Infrastructure Works Crossing the GDDR and into Northern Third-Party Lands – 0.039 Ha (389 sq m)
- **Total Net Site Area = 3 Ha (30,123 sq m).**

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

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

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

	Stage	Metric	Calculation	Residential Site
Compact Growth (Broken down by Site Uses)	A	Net Site Area (sq m)		30,123
	B	Total GFA (sq m)	C+D	14,232
	C	Residential GFA (sq m)		14,232
	D	Non-Residential GFA (sq m)		0
	E	Residential GFA as Proportion of Total GFA (%)	C/B	100%
	F	Pro Rata Site Area (sq m)	AxE	30,123
	G	Number of Dwellings		135
	H	Net Residential Density (dph)	G/F/10000	44.8

Therefore, the subject development adheres to the density requirements pertaining to the subject site by providing 44.8 dph on a site designated for 40 – 80 dph.

We also note that the subject site is identified within Site Development Framework No. 4 in the *Kiltiernan –Glenamuck Local Area Plan 2025* whereby the prescribed density for land within this Site Development Framework is generally 40 dph. Please refer to Section 7.1 below for further details.

Policy and Objective 4.1 (DMURS)

"It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking."

The proposed development has incorporated the principles, approaches and standards of the *Design Manual for Urban Roads and Streets* (DMURS) in its design. This is evident in the drawings and Section 6 of the *Transport & Transport Assessment* prepared by Meinhardt.

Policy and Objective 4.2 (Quality Urban Design and Placemaking)

"It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications."

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

- **"Sustainable and Efficient Movement"**

"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."

- **"Mix and Distribution of Uses"**

"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."

- **"Green and Blue Infrastructure"**

"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."

- **"Responsive Built Form"**

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

"Sustainable and Efficient Movement"

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

"Mix and Distribution of Uses"

The site is zoned for New Residential, and the proposed development aligns with this zoning objective by providing 135 No units. A diverse range of unit types and sizes will also be provided that can facilitate greater housing choice.

"Green and Blue Infrastructure"

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

"Responsive Built Form"

The built-form of the development positively and respectfully responds to the site shape and context of the site. The location of taller duplex blocks fronting the GDDR and GLDR will animate the streetscape along this frontage. The scheme provides a coherent street network with permeable link through the site which will enhance legibility for the village.

Policy and Objective 5.1 (Public Open Space)

"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

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

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

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

This Policy and Objective requires statutory plans to set minimum public open space standards generally in the range of 10–15% of the net site area. As the *Development Plan* already prescribes a minimum public open space requirement of 15%, this is deemed to be the quantitative standard that the proposed development should meet. The proposed development provides 4,788 sq m of useable public open space on a net site area of c. 3 Ha (30,0123 sq m). This represents a provision of 15.9%⁶ public open space which exceeds the requirement for the site (15% = 4,519 sq m).

⁶ This figure excludes the riparian strip (2,590 sq m) as this area is excluded from the net site area due to ecological and topographical constraints. The net site area inclusive of this riparian strip is c. 3.27 Ha (32,713 sq m) and the public open space figure inclusive of this riparian strip is 7,378 sq m (equivalent to 22.5% of the riparian strip + net site area), which is well in excess of the minimum standard of 15%.

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

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

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

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

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for an increase in heights in appropriate locations i.e. on the eastern and north-eastern portion of the lands fronting the GLDR and GDDR.

The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality houses and duplexes, open spaces, which ensures that first-rate living conditions will be developed.

Section 5.3.2 of the *Quality Housing Guidelines* sets out the minimum floor areas for bedrooms and the minimum living room width based on the size of the dwelling as follows:

*"The area of a single bedroom should be at least **7.1m²** and that of a double bedroom at least **11.4 m²**. The area of the main bedroom should be at least **13 m²** in a dwelling designed to accommodate three or more persons.*

*The recommended minimum unobstructed living room widths are **3.3 metres** for one bedroom, **3.6 metres** for two bedroom and **3.8 metres** for three bedroom dwellings, and the minimum room widths for bedrooms are **2.8 metres** for double bedrooms and **2.1 metres** for single bedrooms."* [Author's Emphasis]

Table 5.1 of the *Quality Housing Guidelines* further sets out the target and minimum floor areas for dwellings, living room, aggregate living area (kitchen, living & dining room),

aggregate bedroom areas, and storage. Table 5.1 overleaf provides these target and minimum floor areas relevant to the subject development.

Unit Type	Target Gross Floor Area	Minimum Main Living Room	Aggregate Living Area	Aggregate Bedroom Area	Storage
3B / 5P House (2 No. storey)	92	13	34	32	5
2B / 4P House (2 No. storey)	80	13	30	25	4

Table 5.1: Relevant Target and Minimum Floor Areas of Houses

(Source: Table 5.1 of the *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*)

The proposed houses have been designed in accordance with the minimum and target floor areas and dimensions set out in Section 5.3.2 and Table 5.1 of the *Quality Housing Guidelines*. Please refer to the Housing Quality Assessment prepared by MCORM for full details. As there are no standards for 4-bedroom, 6-person households in Table 5.1 of the *Quality Housing Guidelines*, the proposed E-type houses (4-bedroom, 6-person) have been designed to the standards in Section 5.3.2 of the *Quality Housing Guidelines*.

5.9 Guidelines for Planning Authorities on Childcare Facilities (2001)

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

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

The *Childcare Guidelines, 2001* further state:

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

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

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
 - Residential areas;

- Places of employment;
 - Educational establishments;
 - City and town centres, neighbourhood and district centres;
 - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

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

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

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

"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms."

The *Social Infrastructure Audit* enclosed separately identified that proposed development would generate estimated demand for 13 No. children would need to attend a childcare facility.

As noted throughout this Report, an application for development of the northern lands will be lodged before the expiration of the LRD Opinion in February 2026 which will include a creche that will be designed and sized to cater for the childcare demand of the

subject site and these northern lands. Currently, the creche will provide approximately 500 sq m of floor space to cater for 80 No. children which caters for the childcare requirement across the Masterplan lands.

The *Child Care Act 1991 (Early Years Services) Regulations 2016* sets out the following floor areas for various age groups, which has been complied with in the design of the proposed creche as part of the northern lands application.

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

6.0 STATEMENT OF CONSISTENCY - REGIONAL PLANNING POLICY

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

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

The RSES comprises a number of core Regional Policy Objectives which coincide with the NPF. The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

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

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

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

The proposed development fully responds to the National Planning Policy, in particular the *Apartment Guidelines*, the *Building Heights Guidelines*, and the *Compact Settlement Guidelines*.

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

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

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

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

"Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be

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

The proposed development is located on appropriately positioned lands just north of Kiltarnan Village and west of Carrickmines Retail Park.

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

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

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

The subject development contributes to consolidated growth and the reduction in carbon emissions as it seeks to encourage future residents to avail of sustainable modes of transport through the provision of various permeable links through the site and the provision of 186 No. bicycle parking spaces for example.

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

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

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

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

The subject development seeks to provide a sustainable residential development in the Kiltarnan-Glenamuck area.

The development promotes compact growth in accordance with Section 8.2, as the site is strategically located adjacent to the GDRS. By locating residential development adjacent to the GDRS, future residents will have shorter commuting times to work, school or leisure as the GLDR & GDDR will provide high-quality active travel infrastructure for easy access to nearby public transport options.

Additionally, the provision of a significant quantum of open spaces aide in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community. The proposed Riparian Corridor will also significantly increase biodiversity on site through the inclusion of emergent and typical wetland planting, with nurse logs and boulders to provide additional structure.

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

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

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

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

7.0 STATEMENT OF CONSISTENCY - LOCAL PLANNING POLICY CONTEXT

This section will demonstrate that the proposed development has been designed in accordance with Local Policy as set out within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* ('Development Plan'). The objectives of the *Kiltiernan – Glenamuck Local Area Plan 2025* ('LAP') will also be discussed below.

7.1 Kiltiernan – Glenamuck Local Area Plan 2025

The vision of the LAP, which came into effect in July 2025, is as follows:

"The vision for Kiltiernan – Glenamuck is of a connected and sustainable neighbourhood which enhances the existing green infrastructure, rural character, heritage and biodiversity, and includes a vibrant and inclusive village centre."

The LAP boundary, and the indicative location of the subject site, is illustrated below in Figure 7.1.

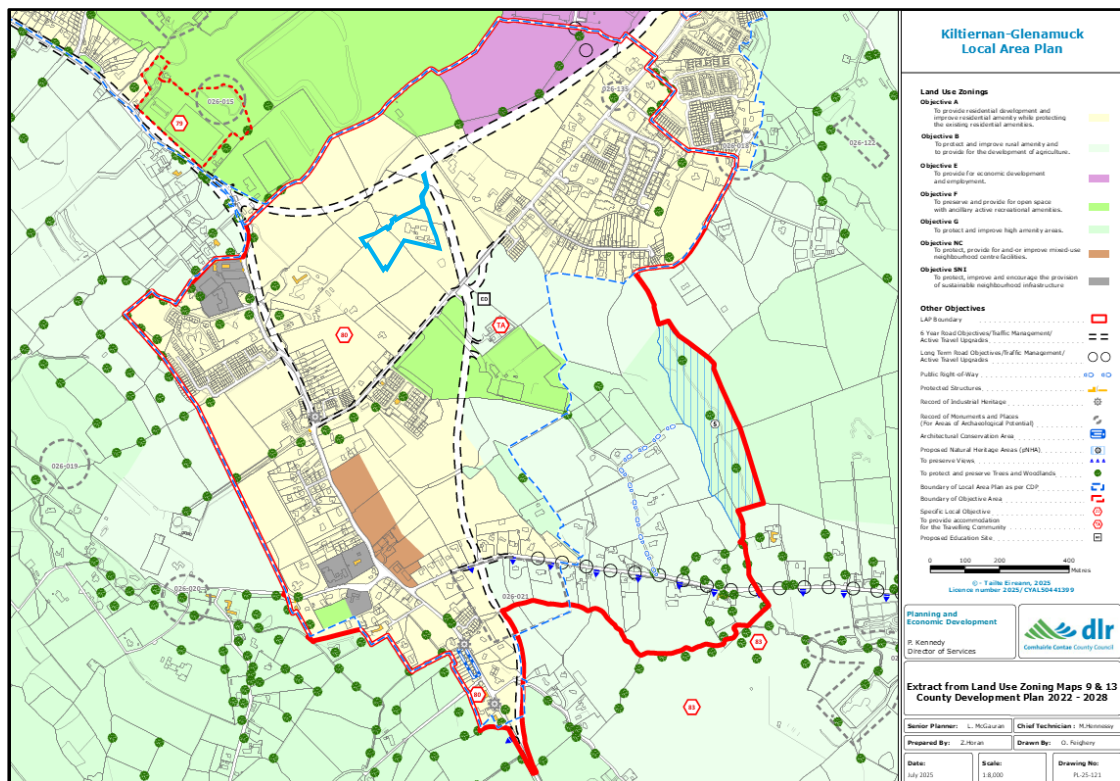


Figure 7.1: Local Area Plan Boundary with the Subject Site Outlined in Blue

(Source: Appendix 7 – Plan Maps and Drawings of the *Kiltiernan – Glenamuck Local Area Plan 2025*, Annotated by Thornton O'Connor Town Planning, 2025)

Section 2.7.4 of the LAP identifies the subject site to be located within the Site Development Framework No. 4 (SDF₄) and the Glenamuck North Character Area, as shown in Figure 7.2.

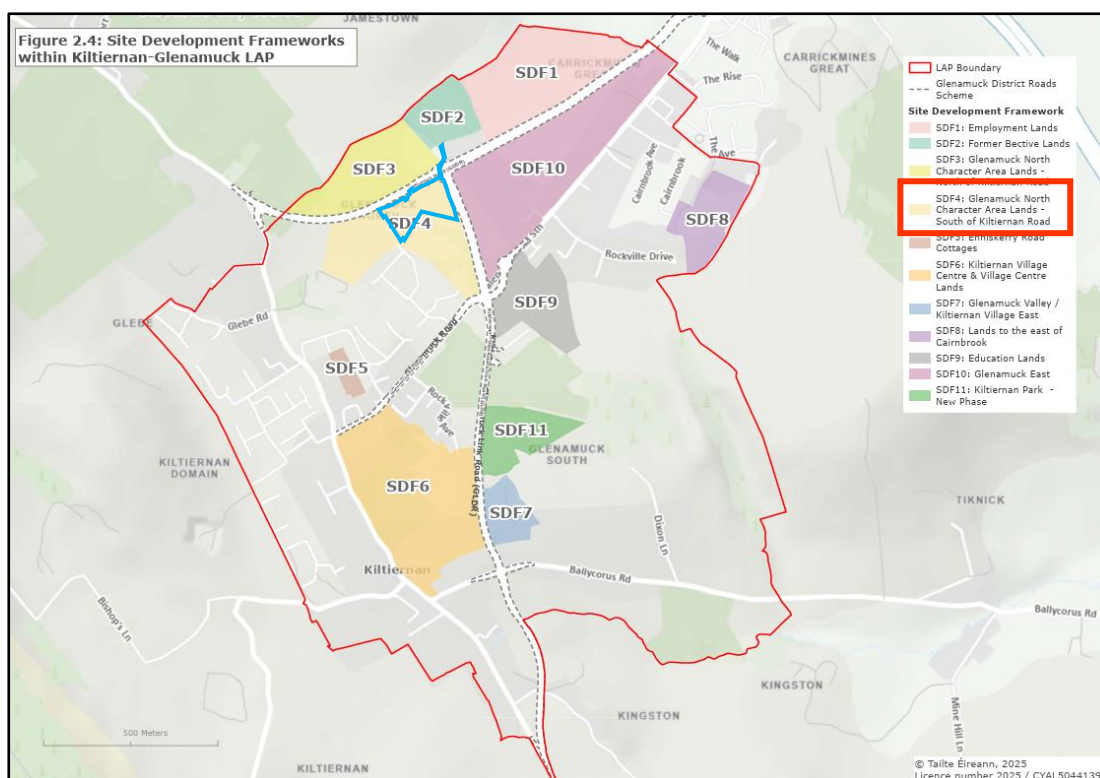


Figure 7.2: Site Development Frameworks Map (Indicative Site Location Outlined in Blue)

(Source: Figure 2.4 – Kiltiernan – Glenamuck Local Area Plan 2025, Annotated by Thornton O'Connor Town Planning, 2025)

The LAP identifies that “this site offers opportunities to provide focal points, recognisable features and elements along Kiltiernan Road which will create a sense of identity and place” and that there “is also an opportunity to provide high quality urban realm and active street frontage onto Kiltiernan Road.”. As discussed above, the GDDR is to be known as the Kiltiernan Road and the GLDR is to be known as the Kiltiernan–Glenamuck Link Road.

The LAP similarly states the following objectives and vision for development within the Glenamuck North Character Area:

“Comprising the western portion of Kiltiernan Road from its junction with the Kiltiernan - Glenamuck Link Road to its junction with the Enniskerry Road the LAP presents an opportunity to include objectives to ensure that new development fronting onto the Kiltiernan Road delivers a high quality, built form and public realm with a strong sense of place and identity.”

“It is envisaged that a sense of arrival will be created at the junction of Kiltiernan Road and Kiltiernan – Glenamuck Link Road through the creation of a focal point, recognisable features and elements to improve upon and enhance the distinct and special character of the area.

There is also potential for links between the Kiltiernan - Glenamuck Link Road beyond the LAP boundary northwards to the future Jamestown Park.

The LAP provides movement, placemaking, built form, and heights objectives for lands located in SDF4. These objectives, which also relate to the abovementioned objectives and

vision for Glenamuck North Character Area, are provided in Table 7.1 below with a response provided as to how the proposed development adheres to these.

SDF ₄ – 1 Movement Objectives	
<p><i>“Ensure that there is a network of legible connected routes through the site, both north- south and east- west. (See Chapter 5 Section 5.6.4 and Figure 5.4 for permeability links).</i></p>	<ul style="list-style-type: none"> The layout includes a legible network of streets that provides desire lines and enhances internal and external connectivity. The permeable links provided throughout the site layout provide a variety for pedestrians and cyclists and will be a safe place for all.
<ul style="list-style-type: none"> <i>Provide a new north to south pedestrian route through the scheme southwards through Grange Oaks and/or Glenamuck Manor and illustrate clear wayfinding to the central green area and onwards to Kiltiernan Village Character Area. (See Chapter 5 Section 5.6.4 and Figure 5.4 for permeability links).</i> 	<ul style="list-style-type: none"> The layout of the scheme provides for a north-south connection between the subject site and Glenamuck Manor, with potential connection points also identified into the Shaldon Grange land adjoining the subject site to the west (future phase of Grange Oaks) and into the land adjoining the subject site to the south, both of which are also within SDF₄.
<ul style="list-style-type: none"> <i>Ensure no parallel vehicular carriageway immediately adjoining Kiltiernan Road.</i> 	<ul style="list-style-type: none"> There is no parallel vehicular carriageway proposed immediately adjoining the Kiltiernan Road.
<ul style="list-style-type: none"> <i>Vehicular access to the site will be via the Glenamuck District Roads Scheme and from lands to the south and west with permeability links to schemes to the south, west and east.</i> 	<ul style="list-style-type: none"> In addition to the connection proposed to the Kiltiernan Road to the north, which we note was indicatively shown on in the GDRS Application as discussed in Section 4.6 above, the subject site will connect into Glenamuck Manor which already facilitates access to Glenamuck Road to the south. A potential future access point is provided at the southern extent of the western boundary to connect into any future application on lands to the west of the site.
<ul style="list-style-type: none"> <i>Provide measures to strongly discourage traffic. Traffic surveys will be carried out within 1 year of the completion of the internal road network. If the volume of through traffic is high, additional traffic calming measures shall be retrofitted by agreements with the Planning Authority.</i> 	<ul style="list-style-type: none"> The layout of the proposed development has designed to ensure safe pedestrian and cycle permeability within and through the subject site. Multiple access points have been provided along the northern, eastern and southern boundaries of the subject site, with a potential future access identified to the western lands. In this regard, residents and members of the public will be encouraged to

	<p>walk or cycle which will ultimately reduce private car usage.</p> <ul style="list-style-type: none"> As outlined in the accompanying <i>Traffic and Transport Assessment</i> prepared by Meinhardt, traffic calming measures have been incorporated into the proposed site layout in the form of reduced corner radii, shorter road sections, narrowed carriageway widths (in accordance with DMURS), and the use of homezones. Traffic surveys will be conducted within one year of the development opening to monitor travel patterns and flows.
SDF₄ – 2 Placemaking Objectives	
<ul style="list-style-type: none"> <i>Provide focal points, recognisable features and elements along Kiltiernan Road which will create a sense of identity and place.</i> 	<ul style="list-style-type: none"> The tallest buildings of the proposed development will be located along the eastern and part of the northern boundary of the subject site to provide a focal point along the Kiltiernan Road and Kiltiernan–Glenamuck Link Road.
<ul style="list-style-type: none"> <i>Contribute to the provision of a hierarchy of complementary open spaces that are well connected both visually and physically by way of urban greening.</i> 	<ul style="list-style-type: none"> Public open space of varying sizes and different purposes are provided throughout the development. The layout of the site has been designed to ensure well-connected and legible open spaces are provided. Please refer to the <i>Landscape Design Statement</i> for full details of the various types of public open spaces provided.
<ul style="list-style-type: none"> <i>Provide a street planting scheme with suitable planting and trees along Kiltiernan Road.</i> 	<ul style="list-style-type: none"> We note that street tree planting is/will already be provided as part of the Kiltiernan Road and Kiltiernan–Glenamuck Link Road, as permitted under ACP Reg. Ref. HA06D.303945. Nevertheless, the proposed development seeks to provide street tree planting of various scales to create defensible spaces across the subject site.
<ul style="list-style-type: none"> <i>Proposed tree planting shall be mainly semi-mature native species.</i> 	<ul style="list-style-type: none"> Please refer to the landscape pack prepared by Niall Montgomery + Partners for details of the proposed tree planting, in particular, Appendix 1 of the <i>Landscape Design Statement</i>.

SDF ₄ – 3 Built Form Objectives	
<ul style="list-style-type: none"> Provide active building frontage along Kiltiernan Road. This active frontage should include own door access. 	<ul style="list-style-type: none"> Duplex blocks A, B & C will be located along the eastern and part of the northern boundary to provide active frontage onto the Kiltiernan Road and Kiltiernan–Glenamuck Link Road. The majority of ground floor units of these duplex blocks are provided with own door access directly from the Kiltiernan Road and Kiltiernan–Glenamuck Link Road.
<ul style="list-style-type: none"> Ensure any development responds to the layout and design of the adjoining schemes, Grange Oaks and Glenamuck Manor 	<ul style="list-style-type: none"> The layout of the proposed development has had regard to the adjoining Glenamuck Manor to the south-west and any future phase of development of Shaldon Grange to the west (future phase of Grange Oaks) and land to the south and south-east. The proposed development will connect into the north-east of Glenamuck Manor, whilst possible future connections to any future phase of development of Grange Oaks to the west and land to the south and south-east have been identified, shall development ever come forth on these lands.
SDF ₄ – 4 Heights Objectives	
<ul style="list-style-type: none"> 2-4 storeys with potential for 5 at appropriate focal points along Kiltiernan Road. 	<ul style="list-style-type: none"> The subject scheme proposes 2 No. storeys houses and duplex buildings that range between 3 No. or 4 No. storeys in height, with tallest heights appropriately located fronting the Kiltiernan Road and Kiltiernan–Glenamuck Link Road.
<ul style="list-style-type: none"> Ensure heights along the Kiltiernan Road achieve a balance between height and scale, contribute to variety in design and avoid monolithic and monotonous buildings. 	<ul style="list-style-type: none"> The duplex buildings along the Kiltiernan Road and Kiltiernan–Glenamuck Link Road vary in height, as mentioned in the previous objective response. Furthermore, the floor and roof levels of the duplex buildings vary due to the site's topography which helps to avoid a monolithic form. For example, whilst Duplex Block C is 3 No. storeys, there is a c. 1-metre difference in height between the northernmost and southernmost extent of the building.

<ul style="list-style-type: none"> <i>Heights shall have regard for topography, surrounding existing developments and the retention of views towards the Dublin Mountains.</i> 	<ul style="list-style-type: none"> The subject site is predominantly flat in nature with a slope towards the north-eastern corner of the site. As mentioned above, the height of the development has had regard to the topography of the subject site by providing the tallest part of the development within the north-eastern extent.
SDF₄ – 5 Density Objectives	
<ul style="list-style-type: none"> <i>Generally, 40 dph.</i> 	<ul style="list-style-type: none"> The density of the proposed development is 44.8 dph, which was calculated in accordance with the <i>Compact Settlement Guidelines</i>. This is considered to be an appropriate density for the site given the need to provide strong frontage onto the Kilternan Road and Kilternan–Glenamuck Link Road as well as contribute positively to the mix of unit types and sizes in the local area.
SDF₄ – 6 Environment Objectives	
<ul style="list-style-type: none"> <i>Layout design should ensure retention of hedgerows in accordance with objective Gl1, chapter 7.” [Our Emphasis]</i> 	<ul style="list-style-type: none"> The layout of the scheme has sought to retain, where possible, the existing hedgerows on site. The retention, enhancement and integration of existing mature trees, hedgerows and the Glenamuck Stream has informed the layout of the development.

Table 7.1: Objectives of the Site Development Framework No. 4 and Proposed Development Compliance with Each Objective

(Source: *Kiltiernan – Glenamuck Local Area Plan 2025* and Thornton O’Connor Town Planning, 2025)

7.2 *Dún Laoghaire-Rathdown County Development Plan 2022-2028*

The following subsections will demonstrate that the proposed development has been designed in accordance with Local Policy as set out within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028 (Development Plan)*.

7.2.1 Core Strategy

The Core Strategy Map outlined in Figure 2.9 of the *Development Plan* demonstrates that Kilternan – Glenamuck is designated as a ‘New Residential Community’. This is illustrated in Figure 7.3 overleaf.

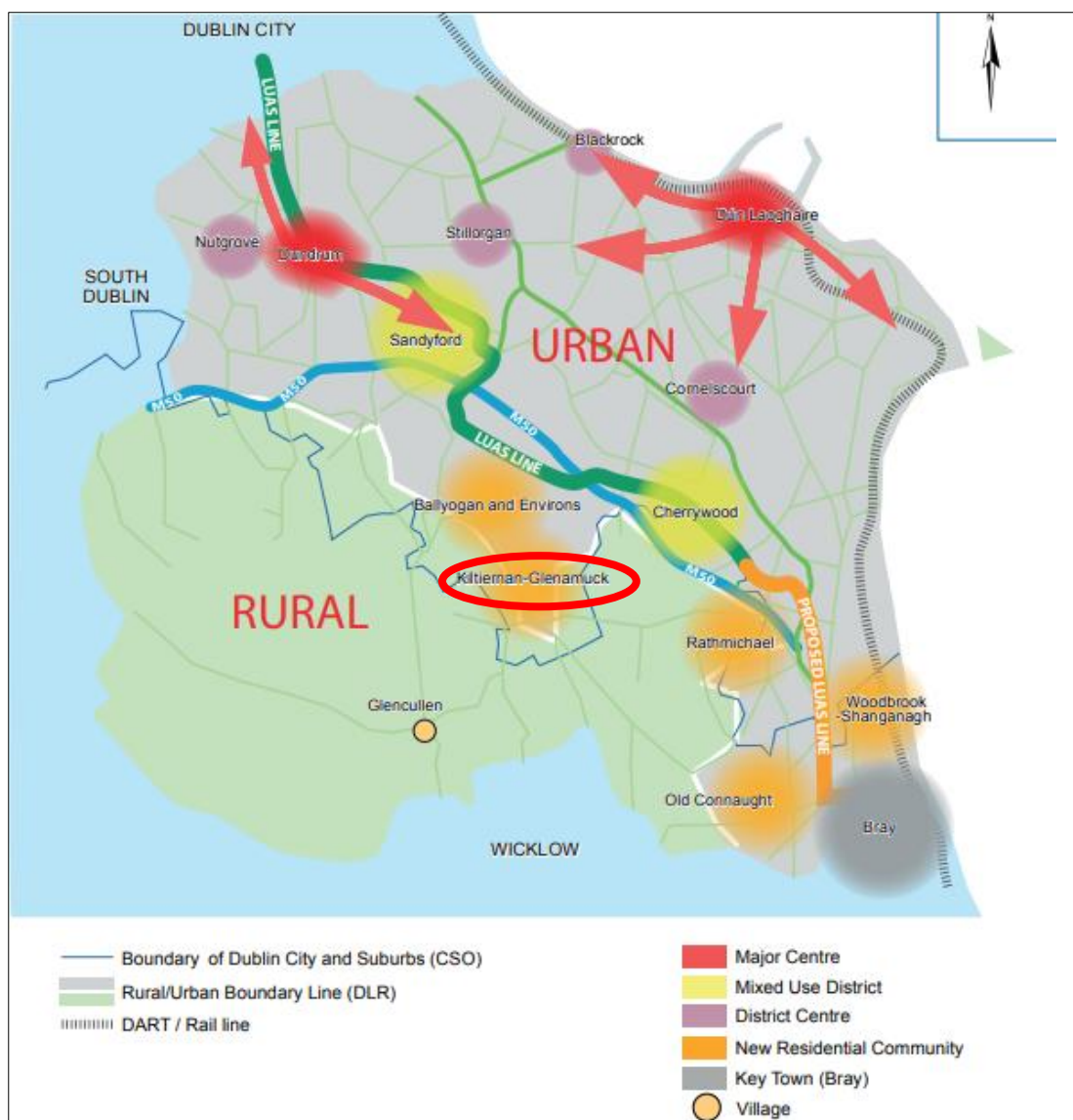


Figure 7.3: Core Strategy Map of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* (Figure 2.9) with 'Kiltiernan-Glenamuck' Outlined in Red

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2025)

Therefore, the proposed development of 135 No. residential units reflects the aspirations set out in the Core Strategy Map by providing a new residential community within Glenamuck North. The proposed scheme provides a sustainable solution for the growing population, by providing a medium-density development on a strategic site within a growing and vibrant suburban village.

7.2.2 Zoning

The subject site is zoned as 'Objective A' in the *Development Plan*, as illustrated in Figure 7.4, where the stated objective is:

"To provide residential development and improve residential amenity while protecting the existing residential amenities."

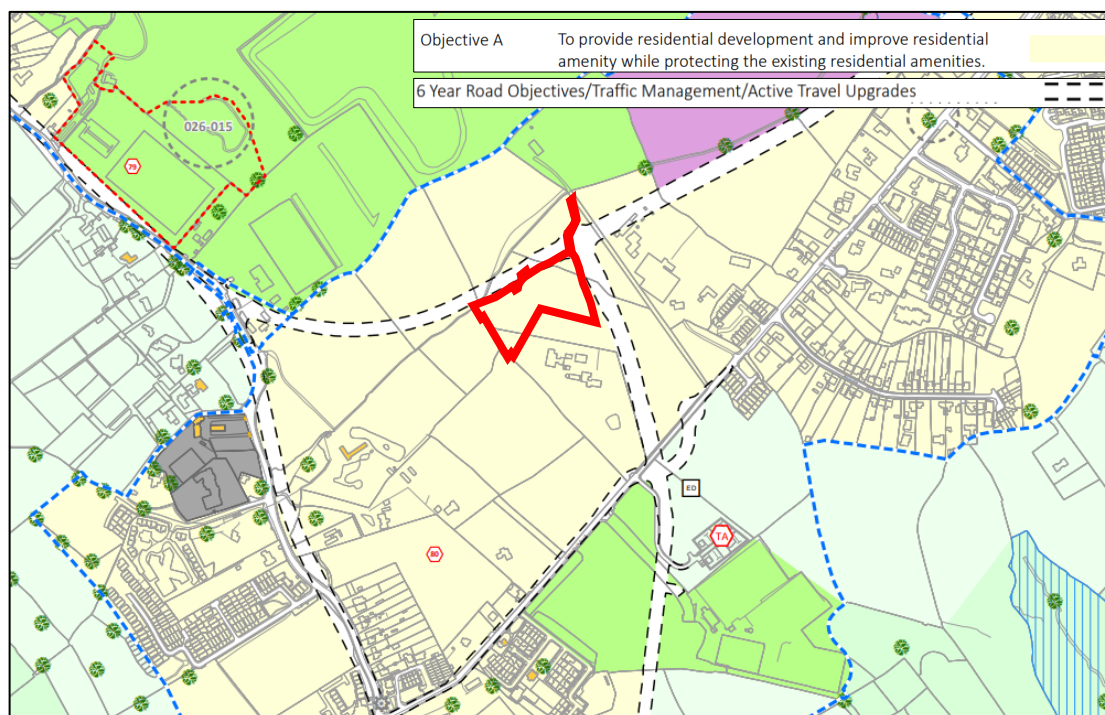


Figure 7.4: Zoning of the Subject Site (Indicatively Outlined in Red)

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2025)

The proposed development comprises residential use only, which is 'Permitted in Principle' under the 'A' zoning objective, as illustrated in Figure 7.5.

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

Figure 7.5: List of Uses 'Permitted in Principle' and 'Open For Consideration' on Lands Zoned as 'Objective A'

(Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2025)

7.2.3 Compliance with the Development Management Standards of the Development Plan

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

12.2.1.2 Design Statements

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

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

12.1.1.3 Landscape Plans

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

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

12.1.2.1 Environmental Impact Assessment

All Planning applications undergo EIAR screening or preliminary assessment.

An Environmental Impact Assessment Screening Report has been prepared by DNV and is submitted with this planning application.

12.1.2.2 Appropriate Assessment

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

- *The Plan or Project will not give rise to significant adverse direct, indirect, or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or*
- *The Plan or Project will have significant adverse effects on the integrity of any European (that does not host a priority natural habitat type and/or a priority species) but there are no alternative solutions, and the Plan or Project must nevertheless be carried out for imperative reasons of overriding public interest – including those of a social or economic*

nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European; or

- *The Plan or Project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons for overriding public interest - restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of European.*

An Appropriate Assessment Screening Report has been prepared by DNV which concludes the following:

*"In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *Rockabill to Dalkey Island SAC (003000)*
- *Dalkey Islands SPA (004172)*

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required." **[Author's Emphasis]**

12.1.2.3 Ecological Impact Assessment

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

An Ecological Impact Assessment has been prepared by DNV and is submitted herewith.

12.2.6 Urban Greening

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

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

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

The SUDS features and measures include the use of bio-retention areas, swales adjacent to roads, tree pits, permeable paving, silt-trap / catchpit manholes, hydrobrake limiting flow to the drained area Qbar greenfield rate, and stone lined voided arch retention storage devices.

A Storm Water Audit has been carried out for the proposed development, in accordance with Section 7.1.5 of Appendix 7.

12.3.1 Quality Design

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

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

12.3.1.1 Design Criteria

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

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

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

Response: As set out in Section 7.2.2, the proposed development is fully in accordance with the zoning objective pertaining to the subject site.

- Compliance with other policy requirements contained within the Plan.

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

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

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

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

Response: The surrounding lands are predominately zoned 'Objective A' as set out in Section 7.2.2, the subject scheme provides a residential development which improves residential amenity and protects the existing residential amenities which accords with this zoning objective.

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

Response: As set out throughout this report, the proposed net density of c. 44.8 dph will appropriately densify these sustainable and underutilised lands and will yield a significantly more appropriate and sustainable density (and is in accordance with the Compact Settlement Guidelines and the parameters of the LAP). Policy Objective PHP18 and PHP20 which relate to density have also been fully responded in this report.

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

Response: The proposed high-quality development comprising 135 No. residential units will create a sense of place and will make a positive contribution to the urban

neighbourhood, streetscape and public realm. The inclusion of high-quality open spaces will enhance the quality of life for future residents and will positively contribute to the local area by improving legibility for the community.

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

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

-Levels of privacy and amenity: Appropriate separation distances provided (and privacy measures identified where these distances aren't met), gradual increase in height in an appropriate location i.e. adjacent to GLDR & GDDR, provision of ample, carefully considered landscape planting where necessary.

-Relationship of buildings to one another: This has been thoroughly considered and discussed throughout the application documentation e.g. adequate separation distances have been provided, high levels of daylight will infiltrate to the proposed rooms and there will be minimal impact on daylight to surrounding properties.

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

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

Response: The scheme has provided the opportunity to open up the site and provide enhanced permeability for the local area by providing linkages through the site to the neighbouring existing and future developments as well as the GDRS. This improved connectivity will have a positive impact on the area. The provision of a residential development fronting the GDRS to the north and east will activate the streetscape. The eastern and part of the northern boundary along the GLDR and GDDR will be provided with high quality duplex blocks overlooking the street frontage. The development will not be gated, ensuring that it reads as being open and connected with the streetscape.

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

Response: The site is also located c. 1.1 kilometres (c. 15 minutes walking distance) from Carrickmines Retail Park and approximately 1.6 kilometres (c. 22-minutes walking distance) from the Ballyogan Wood Luas Stop.

The site is located to the north of Kilternan Village with access to a pub/restaurant, a petrol filling station and shop, 2 No. car garage and auto services, 2 No. primary schools, Further educational facility, numerous creches, sports facilities, and religious services. Bus route Nos. L26, 44, and 118 serve the Kilternan and Glenamuck area with direct links to Dublin City Centre and institutions such as Dublin City University in

Glasnevin. There are also several proposed new bus routes for Kiltarnan within the Bus Connects scheme which will offer transport links to Dublin City Centre and other suburbs and employment locations and education facilities in the greater Dublin area such as University College Dublin. Therefore, it is clear that the subject site is accessible.

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

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

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

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

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

Response: Private open space has been provided for all units and in addition, a large quantum of communal open space (1,142 sq m) will be provided for the duplexes and 4,788 sq m of useable public open space (7,378 sq m of public open space including the Riparian Strip). These spaces are high quality and will provide a natural character throughout the scheme. The relationship between the spaces is demonstrated in the Landscape Design Statement by NMP Landscape Architects.

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

*Response: An Acoustic Design Statement has been carried out and submitted as part of this application. The Report notes the following regarding the existing noise levels of the subject site: "Following a review of the noise levels on the site, including the LAFmax and LAeq, **the site has been characterised as low risk** for both day and nighttime noise based on the existing noise levels." [Our Emphasis]*

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

Response: As discussed throughout the application documentation, the surrounding context is transitioning in character from lower density housing to a mix of low and higher density developments. The potential impact of the proposed development on adjoining sites has been appropriately assessed. The proposed development has been carefully designed and modulated to ensure there is minimal impact to adjoining sites. Rather, the proposed development seeks to integrate into the existing and future developments through the following measures:

- *Continue the existing road infrastructure provided in Glenamuck Manor to improve permeability and accessibility for existing and future residents.*
- *Provide road and active travel infrastructure up to part of the western boundary for the future continuation and connection into any future phase of Grange Oaks.*
- *The provision of a green corridor between the subject site and northern lands (subject to another application to be submitted in due course) which provides desire lines between the two sites.*

- *Variety of house types and unit size.*

Response: The development provides 135 No. residential units comprised of 21 No. 1-bedroom units (all duplexes), 31 No. 2-bedroom units (9 No. houses and 22 No. duplexes), 73 No. 3-bedroom units (46 No. houses and 27 No. duplexes), and 10 No. 4-bedroom units (all houses), which will provide a variety of house types and unit sizes for the area.

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

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

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

Response: The scheme will provide active street frontage and passive surveillance onto the GDRS by providing the duplex buildings along the eastern and part of the northern boundary. Passive surveillance of all open spaces will also be provided. The enhancement and provision of permeable connections through the site, will make a positive contribution to the area.

- *Roofscape, plant and green roofs.*

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

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

12.3.2.2 Sustainable Neighbourhood Infrastructure – Future Provision

(i) New Residential Communities

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

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

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

The subject site is located within a New Residential Community as designated on Figure 2.9 in Chapter 2. However, the proposed development does not provide any community facilities given there is already adequate social infrastructure within the surrounding area. This is confirmed in the *Social Infrastructure Audit* which concludes:

“The baseline study identified a significant range of services and facilities which contribute to quality of life for local residents, comprising 96 No. facilities within close proximity to the subject site (c. 2 km radius). In our opinion, the area is well served with respect to many forms of social infrastructure.....As the above survey demonstrates, there is an adequate supply of healthcare, education, parks and amenity areas, playing pitches and sporting facilities available to local residents. The area has a frequent public transport links to quickly connect the subject site directly to a wider range of facilities located in nearby Leopardstown, Carrickmines, Stepside and Dublin City Centre.”

Furthermore, we note that SPPR 6 of the *Apartment Guidelines* states that the provision of community and cultural facilities shall only be required in specific locations identified within a Development Plan and shall not be required on a blanket threshold-based approach in individual schemes. The subject site is not explicitly identified in the *Development Plan* to provide such uses and thus have not been provided for in the proposed development.

12.3.3 Quantitative Standards for All Residential Development

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

Policy Objective PHP20: sets out that it is a Policy Objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments. The site is located within a New Residential Community rather than a Built-Up Area (as noted above), however the scheme strikes a balance between developing underutilised lands to provide a high-quality residential development while also protecting the surrounding properties with adequate separation distances provided where required.

12.3.3.1 Residential Size and Mix

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

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

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

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

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

Table 12.1 Apartment Mix Requirements

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

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

Table 12.2 Worked example of DLR Apartment Mix requirements

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

Honeypark

In response to this objective, we note the following from SPPR 1 of the recently updated *Apartment Guidelines* states:

"With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms."

As the proposed development is not a social housing development or a scheme specifically providing housing for older persons, in our opinion, there is no unit mix requirement applicable to the subject scheme.

In schemes of 50+ units, where a mixture of housing and apartments or a scheme comprising solely of houses is being provided on a site the housing offering must ensure a mixture that includes a proportion of housing units that are 3 beds or less. In new residential community areas, it is appropriate that schemes generally include houses in addition to apartment/duplexes. In deciding on the mix of house and apartments in these areas regard shall be had to the details of existing and permitted unit types within a 10-minute walk of the proposed development (see bullet point above). The apartment element, if in excess of 50 units, shall comply with the table

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

The site is within a New Residential Community as annotated on Figure 2.9 of the Core Strategy. The development provides 135 No. residential units comprised of 21 No. 1-bedroom units (all duplexes), 31 No. 2-bedroom units (9 No. houses and 22 No. duplexes), 73 No. 3-bedroom units (46 No. houses and 27 No. duplexes), and 10 No. 4-bedroom units (all houses), which will provide a variety of house types and unit sizes for the area. The mix of units outlined above is appropriate for the area and will provide a choice of tenure and a varied choice of housing type.

12.3.3.2 Residential Density

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

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

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

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

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

12.3.4 Residential Development – General Requirements

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

12.3.4.1 Road and Footpath Requirements

The requirements set down in the Council's 'Development Works in Residential and Industrial Areas' - Guidance Document, the Council's 'Taking in Charge Policy Document', (2011 – updated

2013) and 'The Design Manual for Urban Roads and Streets', (DMURS), 2019, will generally apply.

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

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

Please refer to the suite of drawings and Section 6 of the *Traffic and Transport Assessment* prepared by Meinhardt which are submitted herewith for full details on compliance with DMURS. The proposed site layout has also been subject to a Quality Audit (including a Road Safety Audit).

12.3.4.2 Habitable Rooms

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

Please see Section 5.6 of this Report for a response to the relevant standards of the *Apartment Guidelines*, which demonstrates that the scheme will conform with the relevant standards of these Guidelines. Please see Section 5.8 of this Report for a response to the relevant policies of the *Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities'* (2007).

12.3.4.4 Phased Development

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

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

The *Social Infrastructure Audit* enclosed confirms that there is adequate social infrastructure to serve the proposed development and locality. The *Engineering Infrastructure Report & Stormwater Impact Assessment* by Roger Mullarkey & Associates confirms there is adequate physical infrastructure to serve the development. In particular, a Confirmation of Feasibility has been received from Uisce Eireann. The *Traffic and Transport Assessment* also notes that "it is considered that the existing road network

surrounding the site has sufficient capacity to accommodate the additional trips generated by the proposed development without resulting in undue queuing or delay”.

12.3.4.5 Management Companies and Taking in Charge

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

MCORM Architecture have prepared a Taking In Charge Drawing (Dwg Nos. P3-1008), which demonstrate the areas proposed to be taken in charge (i.e. the roads, streets and public open spaces).

A Private Management Company will be engaged to ensure all property management functions area dealt with for the development.

12.3.4.7 Refuse Storage and Services

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

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

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

12.3.5 Apartment Development

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

See responses to these sections below.

12.3.5.1 Dual Aspect in Apartments

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

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

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

100% of the residential units proposed will be dual aspect.

12.3.5.2 Separation Between Blocks

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

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

12.8.7.1 Separation Distances

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

retention of adjoining residential amenity. For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity.

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

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

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

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

In response, we firstly note that the *Compact Settlement Guidelines* have been published and adopted since the adoption of the *Development Plan*. As detailed in Section 5.7, the *Compact Settlement Guidelines* allow a reduction in separation distances to 16-metres. The *Compact Settlement Guidelines* also allow a relaxation on the 16-metre standard in scenarios where opposing windows do not serve habitable rooms and where suitable privacy measures are put in place, such as obscure glazing.

As noted in that section, the scheme principally provides large separation distances across the site. The development only utilises the reduced allowance on a small number of occasions, which demonstrates the high-quality of the scheme.

12.3.5.3 Internal Storage and External Storage

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

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

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

Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements.

These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.

All duplex units will meet, and exceed in some cases, the internal storage standards and requirements set out in Table 12.3. Please refer to the Housing Quality Assessment Tables prepared by MCORM Architecture. Additional storage has also been provided for the duplex units and are located within the bin and bicycle store areas. This external storage space will provide residents with additional space to store larger and bulkier items.

12.3.5.5 Minimum Apartment Floor Areas

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

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

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

12.3.5.6 Additional Apartment Design Requirements

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

The ground floor of the duplex buildings provides a floor to ceiling height of 2.7 metres, in accordance with the above requirement.

12.3.8 Housing for All

12.3.8.1 Age Friendly Housing

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

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

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

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

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

Please refer to Section 4.3 of the *Architectural and Urban Design Statement* for details of how the proposed residential units have been designed in accordance with the principles of Universal Design.

12.4.1 Traffic Management and Road Safety

The road layout of new residential, commercial, and/or mixed-use developments shall be designed in accordance with DMURS which seeks to create self-enforcing 30km/h zones. This Manual sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets, incorporating a multidisciplinary approach to the design of low speed environments in urban areas. All works carried out shall meet the requirements of the Council's 'Taking in Charge Policy Document', 'Development Works Guidance Document', and any successor guidance with respect to taking-in-charge.

To provide for pedestrians and cyclists as part of the development management process, all new development will be required to maximise permeability and connectivity for pedestrian and cyclists and to create direct links to adjacent roads and public transport networks in accordance with the provisions of the 'Urban Design Manual – A Best Practice Guide' (2009), 'Sustainable Urban Housing: Design Standards for Apartments' (2018) and the 'Design Manual for Urban Roads and Streets' (DMURS, 2019).

On existing roads, traffic management measures may be required to create a pedestrian and cycle friendly environment. Road safety interventions may also be required to create a safe road environment for all road users such as the provision of accessible pedestrian facilities and segregated cycle tracks.

To ensure that the needs of all road's users are considered, a Quality Audit may be required for major developments that impact on the road network and for all new road and traffic schemes. This should be carried out in accordance with DMURS and best UK practice. The Design Manual for Urban Roads and Streets Quality Audits generally consist of a number of individual and overlapping audits that may include: an audit of visual quality; a review of how the street is/may be used by the community; a road safety audit, including a risk assessment; an access audit; a walking audit; a cycle audit; a non-motorised user audit; a community street audit (in existing streets); and a place check audit. A street design audit was added as an additional audit type in the DMURS Guidance in 2019. It can be submitted as a component of a Quality Audit (for larger projects) or as a stand-alone audit process for smaller projects, the emphasis is on placemaking and promoting the multidisciplinary aspects of successful street design. This is an auditing tool that can be used to ensure that the that the four major aspects of street design as set out in DMURS: Connectivity, Self-Regulating Street Environment, Pedestrian and Cycling Environment, and Visual Quality are appropriately taken into account.

Potential applicants for planning permission should engage in pre-planning discussions to ascertain which audits, if any, should be submitted with the application. Further details on the

guidance on the audit thresholds can be found within the 'Development Management Thresholds Information Document' in Appendix 3.

The design of the road network is DMURS compliant (Please see *Traffic & Transport Assessment* enclosed separately). Permeability through and within the site is maximised. The GDRS will include high-quality pedestrian and cycle facilities making it safer for all road users and improves its place making function.

Pedestrian and cyclist permeability has been comprehensively considered, and the scheme maximises permeability and connectivity for pedestrian and cyclists by creating direct links through and within the site to surrounding areas/developments.

12.4.2 Traffic and Transport Assessment

Where new development has significant car trip potential, a detailed assessment of:

- The transportation systems available and
- The impact of the proposed development on the surrounding environment and transportation network, should be appraised through the submission of a Traffic and Transport Assessment (TTA), in accordance with Transport Infrastructure Ireland (TII) 'Traffic and Transport Assessment Guidelines', (2014). The requirements for a TTA should be ascertained at pre-planning stage.

Traffic and Transport Assessments shall project forward 5 years and 15 years after opening date in accordance with the TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines, and shall, in their analysis, consider all major road and traffic schemes and existing and proposed developments in an area (Refer also to Appendix 3 Development Management Thresholds).

A Traffic and Transport Assessment has been prepared by Meinhardt, which takes account of all relevant guidance including the relevant TII Guidelines and concludes that:

"It is noted that only the first three thresholds are applicable to the proposed residential development. As the scheme comprises 135 residential units and, as previously referenced, the anticipated trip generation would increase traffic flows on the adjoining road by 5.06%, the development does not meet any of the three relevant thresholds that would require a Transport Assessment.

For the reasons outlined above, it is considered that the existing road network surrounding the site has sufficient capacity to accommodate the additional trips generated by the proposed development without resulting in undue queuing or delay." [Our Emphasis]

12.4.3 Travel Plans

Preparation of a travel plan required.

A Mobility Management Plan has been prepared by Meinhardt which concludes:

"This MMP has found the proposed development site to be well positioned to benefit from both existing and planned active travel facilities and public transport

infrastructure. This will enable the development to align with the objectives of the MMP, namely, to encourage residents to use sustainable modes of travel for commuting and recreational trips, while reducing the number of single-occupancy vehicle journeys."

12.4.5.1 Parking Zones

The propensity of people to choose non car modes is to a great extent determined by proximity to quality public transport as well as the range and accessibility, on foot or by bicycle, of services within an area. The County has therefore been divided into four Parking Zones, reflecting the varying degrees to which these criteria are generally met. Car parking within new developments will be in accordance with the standards set out in Table 12.5. The Parking Zones are indicative as set out on Map T2 and described below:

(i) Parking Zone 1:

This zone generally comprises the Major Town Centre areas of Dún Laoghaire and Dundrum together with the Blackrock District Centre area. These are areas, which are generally characterised by:

- *Access to a high level of existing and planned public transport services (rail and bus) with good interchange potential.*
- *A high level of service accessibility, existing and planned, by walking or cycling.*
- *A capacity to accommodate high density retail, office and residential developments.*

Within parking zone 1 Maximum car parking standards have been set for all uses including residential.

(ii) Parking Zone 2

This zone generally includes areas, which are within the following walking bands/catchments:

- *10 minute walk of the proposed CBC 13 (Core Bus Corridor) from DCC boundary along the N11 to Kill Lane.*
- *5 minute walk of the N11 proposed CBC from Kill Lane Junction to Bray.*
- *10 minute walk of the proposed CBC 15 from DCC boundary to Blackrock.*
- *5 minute walk of Kill Lane/Avenue/Mounttown bus route.*
- *10 minute walk of Dart and Luas stations.*

Note: The N11 Quality Bus Corridor (QBC) and the Rock Road QBC will be replaced by CBC 13 and 15.

These are areas, which are generally characterised by:

- *Access to a good level of existing or planned public transport services.*
- *A good level of service accessibility, existing and planned, by walking or cycling.*
- *A capacity to accommodate a higher density of development than surrounding areas.*

Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. For residential uses reduced provision may be acceptable dependent on criteria set out in Section 12.4.5.2 below.

(iii) Parking Zone 3

This zone generally comprises the remainder of the County, excluding rural areas. These are areas, which are generally characterised by:

- *Access to a level of existing or planned public transport services*
- *A reasonable level of service accessibility, existing and planned, by walking or cycling*
- *A capacity to accommodate a higher density of development than rural areas.*

Within parking zone 3 maximum standards shall apply to uses other than residential where the parking standard shall apply. In zone 3 additional parking shall be provided for visitors in residential schemes at a rate of 1 per 10. In some instances, in zone 3 reduced provision may be acceptable dependent on the criteria set out in 12.4.5.2 (i) below with particular regard to infill/brownfield developments in neighbourhood or district centres.

*The proposed development is located in Zone 3 as defined under the **Development Plan** (see further details below).*

12.4.5.2 Application of Standards

In relation to the maximum standards, any proposals exceeding these standards will be permissible only in exceptional circumstances; such as where the Planning Authority consider that there is a specific requirement for a higher number of spaces. An example of this would be in instances where there are demonstrable benefits for the wider area through regeneration or similar urban and civic improvement initiatives.

In certain instances, within all zones, applicants may be required to provide the maximum number of spaces.

In certain instances, in Zones 1 and 2 the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 or may consider that no parking spaces are required. Small infill residential schemes (up to 0.25 hectares) or brownfield/refurbishment residential schemes in zones 1 and 2 along with some locations in zone 3 (in neighbourhood or district centres) may be likely to fulfil these criteria.

In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority, having regard to criteria as set out below:

(i) Assessment Criteria for deviation from Car Parking Standards (set out in Table 12.5)

- *Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The need to safeguard investment in sustainable transport and encourage a modal shift.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Existing availability of parking and its potential for dual use.*
- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*
- *The range of services available within the area.*

- *Impact on traffic safety and the amenities of the area.*
- *Capacity of the surrounding road network.*
- *Urban design, regeneration and civic benefits including street vibrancy.*
- *Robustness of Mobility Management Plan to support the development.*
- *The availability of on street parking controls in the immediate vicinity.*
- *Any specific sustainability measures being implemented including but not limited to:*
 - *The provision of bespoke public transport services.*
 - *The provision of bespoke mobility interventions.*

Where a development site is located on the boundary of two or more parking zones, the level of parking provision will be decided at the discretion of the Planning Authority having regard to the criteria set out above. In Zones 1 and 2, where a deviation from the parking standards set out in Table 12.5 is being proposed, the applicant should engage with the Council at pre-planning stage regarding the acceptability of the proposal.

As the subject site is located in Parking Zone 3 ('Remainder of County (non-rural)') as per the *Development Plan*, the standards shown in the table below apply to the proposed development.

Unit Type	Car Parking Standard in Zone 3	Units Proposed	Standard No. of Spaces Required	Visitor Car Parking in Zone 3	Visitor Spaces Required
2-bed Houses	1 per unit	9	9 No. spaces	-	N/A
3-bed Houses	2 per unit	46	92 No. spaces	-	N/A
4-bed Houses	2 per unit	10	20 No. spaces	-	N/A
Total Houses		65	121 No. Spaces	-	N/A
1-bed Duplex	1 per unit	21	21 No. spaces	1 per 10 parking spaces	2.1
2-bed Duplex	1 per unit	22	22 No. spaces		2.2
3-bed Duplex	2 per unit	27	54 No. spaces		5.4
Total Duplexes		70	97 No. spaces		10 No. spaces
Overall		135	218 No. spaces		10 No.
Total			228 No. Car Parking Spaces		

The proposed development provides 199 No. car parking spaces, with 126 No. dedicated to the houses and 73 No. dedicated to the duplex units. Of the 126 No. spaces for the houses, 124 No. are to cater for residents and 2 No. are to cater for visitors. Of the 73 No. spaces for the duplexes, 70 No. are to cater for residents and 3 No. are to cater for visitors.

The residential car parking provision (199 No. provided) is slightly lower than the standard requirement set out in the *Development Plan* (228 No.). As detailed in Section 5.7, the development is also in accordance with the *Compact Settlement Guidelines* which seeks a maximum of 270 No. residential parking spaces.

The car parking ratio (1.47 No. spaces per unit) is deemed appropriate for the location of the development in the Glenamuck-Kiltarnan area and having regard to the proposed mix of units and the availability of ample bicycle parking.

In addition, the *Development Plan* does allow for a deviation from the standards which it sets for car parking (apartments and duplexes are the only element below the *Development Plan* standards). Specifically, Section 12.4.5.2 of the *Development Plan* states:

"In all instances, where a deviation from the maximum or standard specified in Table 12.5 is being proposed, the level of parking permitted and the acceptability of proposals, will be decided at the discretion of the Planning Authority, having regard to criteria as set out below:

- *Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The need to safeguard investment in sustainable transport and encourage a modal shift.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Existing availability of parking and its potential for dual use.*
- *Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals).*
- *The range of services available within the area.*
- *Impact on traffic safety and the amenities of the area.*
- *Capacity of the surrounding road network.*
- *Urban design, regeneration and civic benefits including street vibrancy.*
- *Robustness of Mobility Management Plan to support the development.*
- *The availability of on street parking controls in the immediate vicinity.*
- *Any specific sustainability measures being implemented including but not limited to:*
 - *The provision of bespoke public transport services.*
 - *The provision of bespoke mobility interventions."*

Informed by the foregoing, the following points summarise the justifiable reduction in the provided car parking provision:

1. ***Proximity to public transport services and level of service and interchange available.***
Number of bus services located in the vicinity of the site and Ballyogan Wood Luas stop within 1.6 kilometres (c. 22 minutes walking distance).
2. ***Walking and cycling accessibility/permeability and any improvement to same.***
Good existing walking facilities provided by the GDRS and significant improvements to walking and cycling proposed by the numerous connections and links through the site and surrounding existing and future developments.
3. ***The need to safeguard investment in sustainable transport and encourage a modal shift.***
Level of car parking looks to balance between provision of necessary amount while not adversely impacting on encouraging mode shift.
4. ***The range of services available within the area.***
The *Social Infrastructure Audit* demonstrates that the area is well served with services and facilities to cater for the development which will reduce the level of car trips and

car ownership as people will be able to walk or cycle to get to their destination in a reasonable time.

5. *Impact on traffic safety and the amenities of the area.*

Level of car parking is balanced so as to not adversely impact on safety.

6. *Capacity of the surrounding road network.*

Reduced car parking versus *Development Plan* standards will result in few trips on the network that will have a positive impact on capacity versus higher parking version.

7. *Urban design, regeneration and civic benefits including street vibrancy.*

Level of car parking is a balance to achieving an optimal urban realm that includes landscaping and amenity, play, safety and place making.

Having regard to the above, it is considered that the proposed car parking ratio is acceptable for the proposed development.

12.4.5.3 Car Parking – General

In instances where Table 12.5 does not specify a parking standard for a particular land use, the Planning Authority shall determine the parking requirements having regard to the assessment criteria for parking provision as set out above.

For both residential and non-residential car parking, 4% of car parking provision shall be suitable for use by disabled persons. In certain circumstances the Planning Authority may consider that a higher disabled parking content may be required depending on the nature of development. All disabled parking should be clearly marked and suitably sign posted for convenient access.

Some 3 No. accessible parking spaces are provided for the development, which meets the required 4% of the duplex car parking spaces of the *Development Plan*.

For apartment developments, car parking spaces should be allocated to residential units and visitor car parking. All visitor car parking is to be for short term use and not to be used by residents. Car parking shall be managed as such by a management company. For apartment developments car parking spaces associated with residential units must be sold in conjunction with the units and not sold separately, or let, to avoid take-up by non-residents and will be conditioned as such in the development management process.

Any surface carparking should be suitably integrated into the site with soft landscaping proposals and have regard to SuDS.

Car parking for duplexes is provided in accordance with this policy. Car parking spaces will not be sold separately.

12.4.6 Cycle Parking

Cycle parking should accord with the Council published – ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018) or any subsequent review of these standards. These are minimum cycle parking standards. In car parking Zones 1 and 2 these

minimum standards should be exceeded. It is intended that the next review of the Council's cycle parking standards would be aligned with the 4 parking zones set out in Section 12.4.5.1 above.

*Cycle parking is provided in accordance with these standards. As set out in the *Mobility Management Plan* prepared by Meinhardt, the scheme is in accordance with the 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments' and will provide 186 No. cycle spaces.*

12.4.6.2 Cycle Parking Assessment Criteria

In general, new residential developments of 5 units or more or non-residential of 400 sq. m. or over will be assessed in accordance with the following criteria:

- Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of outsized formats (cargo bikes etc)?*
- Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?*

Where cycle parking cannot be conveniently provided within the development, a financial contribution of €500 per cycle parking stand will be required to provide alternative on-street cycle parking provision in the vicinity of the development.

Consideration should be given to requiring the provision of cycle parking-related directional signage, in particular for storage and commercial parking facilities. Bike lockers, showers and changing rooms should be available at final destination storage facilities (private).

For short-term cycle parking (e.g. for customers or visitors), cycle parking is required at ground level. This should be located within 25 metres of the destination in an area of good passive surveillance. Weather protected covered facilities should be considered where appropriate. Consideration should be given to using green roofs in the design of standalone cycle parking shelters. Appropriate cycle parking signage may also be required to direct cyclists to the end destination.

For long-term cycle parking (e.g. for more than 3 hours for residents, staff, students), secure covered cycle parking is a requirement. This should be conveniently located within 50 metres of the destination and located near building access points where possible.

In all cases it is a requirement to provide showers, changing facilities, lockers and clothes drying facilities, for use by staff that walk or cycle to work. CCTV cameras or passive surveillance of car parks and cycle parks may be required for personal safety and security considerations.

All cycle facilities in multi-storey car parks shall be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park and with minimum headroom of 2.4 metres to facilitate access by cyclists.

Within larger new developments cycle routes shall link to the existing cycle network where possible and maintain a high degree of permeability through developments. Cycle Audits may be required in such developments.

The cycle parking provision is discussed in the *Mobility Management Plan* prepared by Meinhardt. The scheme provides permeable pedestrian and cycle links to the surrounding area through the subject site.

12.4.7 Motorcycle Parking

It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.

The proposed development includes 8 No. motorcycle parking spaces which complies with the requirement to provide four or more spaces per 100 No. car parking spaces (199 No. car parking spaces provided). Motorcycle parking is provided for residential duplexes and can also be accommodated within the curtilage of each house.

12.4.8 Vehicular Entrances and Hardstanding Areas

12.4.8.1 General Specifications

Vehicle entrances and exits shall be designed to avoid traffic hazard for pedestrians and passing traffic. Where a new entrance onto a public road is proposed, the Council will have regard to the road and footway layout, the traffic conditions on the road and available sightlines and will impose appropriate conditions in the interest of public safety. In general, for a single residential dwelling, the maximum width of an entrance is 3.5 metres. For a shared entrance for two residential dwellings, this may be increased to a maximum width of 4 metres. Each car parking space for a residential dwelling shall have a minimum length of 5.5 metres depth to ensure the parked car does not overhang onto the existing public footway and a minimum width of 3 metres to allow for clearance from nearby wall/steps/boundary.

Proper provision shall be made for sightlines at the exit from driveways in accordance with the requirements in DMURS, and as appropriate to the particular road type, and speed being accessed.

Automatic electronic gates into residential developments are not favoured and should be omitted. Electronic or automatic gates are not acceptable in terms of road safety unless the entrance is set back from the back of the footway, to avoid the roadway or footway being obstructed by a vehicle while the gate is opening. In general, outward opening gates will not be considered acceptable. A minimum of a 1.2 metres access path shall be provided for each dwelling. Sufficient space shall also be provided for refuse storage and service metres (Section 12.3.4.7) cycle storage (Section 12.4.6) and urban greening and SUDS (see Section 12.4.8.3).

All accesses are DMURS compliant and are appropriate for traffic volumes. Please refer to Section 6 of the *Traffic and Transport Assessment* prepared by Meinhardt for more details.

12.8 Open Space and Recreation

12.8.1 Landscape Design Rationale

Planning applications for both residential (10+ units or as required by the Planning Authority) and commercial (1,000 sq.m. or as required by the Planning Authority), including leisure and recreational facilities, should submit a landscape design rationale prepared by a qualified Landscape Architect or other suitably competent landscape professional (as deemed appropriate by the Planning Authority), for the consideration of the Parks and Landscape Services Department. Smaller schemes may also require a Landscape Plan to be submitted. All such requirements should be ascertained at pre-planning stage.

The design rationale shall set out and specifically indicate how the overall approach is ecologically resilient and provides varied landscapes that reflect the character of the area.

The landscape design rationale should also address the following:

- *Ecosystems services and carbon capture approach.*
- *Urban Greening.*
- *Biodiversity including pollinator friendly approach.*
- *Sustainable Drainage Systems.*
- *Maintenance without the use of chemical.*
- *Nature Based Play.*

Such proposals shall include a scaled Landscape Plan(s) including:

- *Cross-sections, where applicable, indicating the layout and hard and soft treatments of all boundaries, features, external areas, and green spaces.*
- *Specifications for materials, workmanship, and maintenance, together with proposed design details.*
- *Hard landscape details are to include, where applicable, any proposed lighting, seating, kerbing, boundaries, edging, surfacing and water features.*
- *Soft landscape details are to include, detailed planting plans and planting schedules, stating species/varieties, quantities, sizes, rootball presentation, and spacings.*
- *A Landscape Plan shall be accompanied by a timescale for its implementation, including a minimum 18-month landscape maintenance period and a defects liability clause.*
- *Regard should also be had to Policy Objective OSR14: Play Facilities and Nature Based Play.*

A Landscape Design Statement and Drawings are included with this planning application prepared by NMP Landscape Architecture, which addresses these items where relevant.

The scheme proposes pollinator species to benefit biodiversity, and the greening of the site which will occur by providing 311 No. planted trees. The report provides details of SUDS, and we note that all external paved and landscaped areas will require low/minimal maintenance and can be maintained without use of chemicals.

Play spaces are provided with play equipment that has similar tasks but different levels of challenge for age groups and abilities, such as the climbing frame, providing children with a choice.

In addition, details of sections, materials, maintenance, hard landscaping and soft landscaping are provided throughout the documentation and the relevant policies of the *Development Plan* have been duly considered.

12.8.3 Open Space Quantity for Residential Development

Table 12.8 within Section 12.8.3.1 of the *Development Plan* sets out the following public open space requirements for residential developments:

Location	Public Open Space Standards (minimum)
Residential Development in new residential communities as shown in the Core Strategy - Figure 2.9	15% (of site area)
Residential Development in the existing built up area	15% (of site area)
Institutional and Redevelopment of SNI use	25% (of site area)

The scheme requires 15% of public open space. Public open space equating to 4,788 sq m (equivalent to 15.9 % of the net site area) has been provided across the site. The Riparian Strip around and inclusive of the Glenamuck Stream, measuring 2,590 sq m, has been discounted from the useable public open space provision, in accordance with the net site area calculation in the *Compact Growth Guidelines* (See Section 5.7 above).

However, given the visual amenity offered by the Riparian Strip, we consider that that this space could be counted toward the public open space provision. In this regard, the net site area (3 Ha) would increase to c. 3.27 Ha (32,713 sq m) to account of the Riparian Strip and thus the total public open space provision would equate to 22.5% of the revised net site area. For full details on the open space strategy, please refer to the *Landscape Design Statement* prepared by NMP Landscape Architecture.

Table 12.9 within Section 12.8.3.2 of the *Development Plan* sets out the following communal open space requirements for apartment developments:

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 bed) ⁷	6 sq m
Two Bedrooms (4 bed)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

The proposed development has the following unit mix and associated communal open space requirement (duplexes only):

Unit Type	Communal Amenity Space Requirement	No. of Units	Total Communal Space Required
Studio	4 sq m	-	-
1-bed	5 sq m	21	105 sq m
2-bed (3-pers)	6 sq m	3	18 sq m

⁷ The *Development Plan* states Two Bedrooms (3 bed) and Two Bedrooms (4 bed) however we assume that this should read Two Bedrooms (3 person) and Two Bedrooms (4 person)

2-bed (4-pers)	7 sq m	19	133 sq m
3-bed (4-pers)	7 sq m	-	-
3-bed (5-pers)	9 sq m	27	243 sq m
Total:		70 No. duplex units	499 sq m

The total communal open space requirement for the proposed development is 499 sq m and this total provided is 1,142 sq m. The communal open space provision significantly exceeds the requirements of the *Development Plan*.

Table 12.10 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for houses:

Unit Type	Minimum Area per Unit
1-2 bedroom	48 sq m*
3 bedroom	60 sq m
4 bedroom (or more)	75 sq m

* may be acceptable in cases where it can be demonstrated that good quality usable open space can be provided on site.

The *Compact Settlement Guidelines*, as discussed previously in Section 5.1.6, requires houses to be designed to comply with the minimum private open space standards set out in SPPR2, which require a minimum of 30 sq m for 2-bed houses, 40 sq m for 3-bed houses and 50 sq m for 4-bed+ houses.

As per the *Planning and Development Act, 2000* (as amended), Planning Authorities and An Coimisiún Pleanála shall have regard to Ministerial Guidelines and shall apply any Specific Planning Policy Requirements of the Guidelines in the performance of their functions⁸. As such, in assessing the minimum private amenity space to be provided for the proposed development, SPPR 2 of the *Compact Settlement Guidelines* relating to minimum standards takes precedence over those set out in Objective DMSO27 of the *Development Plan*.

As demonstrated in Section 5.7 above, the proposed development complies with the minimum private amenity space requirements set by the *Compact Settlement Guidelines*.

Table 12.11 within Section 12.8.3.3 of the *Development Plan* sets out the following private open space requirements for apartment developments:

Unit Type	Minimum Area per Unit
Studio	4 sq m
One Bed	5 sq m
Two Bedrooms (3 persons)	6 sq m
Two Bedrooms (4 persons)	7 sq m
Three bedrooms	9 sq m
Four +	12 sq m

Private open space has been provided for each duplex unit in the form of a balcony or terrace in line with the requirements outlined in Table 12.11.

⁸ Section 28 (1C) of the *Planning and Development Act, 2000* (as amended).

12.8.5.3 Communal Open Space – Quality

Communal amenity space within apartment and/ or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year in accordance with BRE 209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice', (2011). The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme. Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable.

Playgrounds in communal open space areas should be carefully sited within residential areas to ensure they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residences.

The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents within the development. In particular, accessible, secure and usable outdoor space is a high priority for families with young children, and for less mobile older people.

A total of 1,142 sq m of communal open space has been defined as part of the landscaping proposition for the development. The north-easternmost communal amenity space will provide a play area, allotment, a terrace area and grassed and landscaped areas whilst the southern communal amenity space will provide a terrace and grassed and landscaped areas for social interaction.

The communal open spaces will experience passive surveillance through the overlooking of the adjacent duplex units. The spaces will be easily accessible for all persons, including for families with young children and less mobile older people.

12.8.7.2 Boundaries

In all cases, suitable boundary treatments both around the side and between proposed dwellings shall be provided. In this regard, boundary treatments located to the rear of dwellings should be capable of providing adequate privacy between properties.

Boundaries located to the front of dwellings should generally consist of softer, more open boundary treatments, such as low-level walls/railings and/or hedging/planted treatments.

Provision of 'defensible' space, e.g. a planting strip, to the front of dwellings should be provided to contribute towards a sense of security within the home. Bin storage and/or utility meter alone, should not form any proposed defensible space areas.

Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule.

Please see *Landscape Design Statement* and the landscape drawings prepared by NMP Landscape Architects. As part of this, various boundary treatments are provided throughout the site layout.

12.8.8 Financial Contributions in Lieu of Open Space

Where the required open space standards cannot be provided, the Developer should indicate what is required as per the requirements of the County Development Plan (Section 12.8.), and what is to be provided to serve the development. Applicants should submit a clear schedule with public, private and communal open space requirements and proposals set out along with any short fall. Where the required open space cannot be achieved, the applicant shall provide a contribution in lieu of providing the full quantum of public open space. This shall apply to both residential (including Built to Rent) and non-residential/commercial developments. In some instances, this may relate to a more urban context, which allows the development to contribute to the urban realm and the liveability value of the development in the context of its location by way of a financial contribution. This will take the form of a contribution towards capital investment in improving the urban realm by creating and/or upgrading local parks and spaces and revenue costs for the maintenance of these spaces.

Public open space has been included as part of the proposed development in accordance with the *Development Plan* standards (e.g. in excess of 15% of the site area). Therefore, a financial contribution in lieu of open space is not required.

12.8.9 Play Facilities for Apartments and Residential Developments

In line with the 'Ready Steady Play! A National Play Policy', DCYA (2019) provision should be made to include suitable play opportunities for all ages of the child population within new residential developments. Design details relating to play areas shall be submitted as part of any relevant planning application to include a detailed specification of any playground to be provided and incorporate natural play, wherever possible.

Play Facilities should incorporate the Nature-based play philosophy and approach to play provision throughout the County (see Policy Objective OSR14: Play Facilities and Nature Based Play).

The Council will endeavour to ensure that all play facilities will be accessible and provide inclusivity. The Council will have regard to changing demographics in how and where it provides for play. Multiple Use Games Areas (MUGA) incorporating, for example basketball and 5-a-side facilities will be considered in any calculation of the 'Equipped Play Space' standards.

In terms of play facilities for children regard shall be had to the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018', (or any superseding document), which request consideration of the recreational needs of children in the design of apartment schemes. Safety of children needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces.

Children's play needs around the apartment building should include:

- Within the private open space associated with individual apartments.
- Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,
- Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.

The perimeter block with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled. The landscape design and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and this should be designed appropriately.

The proposed development provides a number of opportunities for children's play as illustrated on the Landscape Masterplan prepared by NMP Landscape Architecture.



Figure 7.6: Proposed Play Space and Exercise Equipment

(Source: NMP Landscape Architecture, 2025)

Therefore, it is clear that a wide range of play areas have been provided within the proposed development, which are located proximate to buildings and the development adheres to the requirements of the *Development Plan*.

12.9.9 Development and Overhead Power Lines

In relation to high voltage overhead electricity lines, development proposals within the distances specified below should contact the ESB in advance of completing or finalising designs etc. (i.e. prior to pre planning stage), so as to ensure that the relevant clearances are maintained from any High Voltage Overhead Electricity (HV OHL) Infrastructure.

- For buildings in proximity to a 110kv overhead line, 23 metres either side of the centre line of a pylon.

- For buildings in proximity to a 220kv overhead line, 30 metres either side of the centre line or around a pylon.
- For buildings in proximity to a 400KV line, distance of 35 metres either side of the centre line or around a pylon.

For buildings in proximity to a 10kv or a 38kv overhead line, no specific distance is specified. However, a site specific clearance may be required.

Clearances are Site and Transmission Line Span Specific. Clearance are sperate to construction safety clearances to be adhered to and maintained from the Overhead Line (OHL), which are specified in the ESB publication, 'Code of Practice for avoiding danger from overhead electricity lines'

https://www.hsa.ie/eng/publications_and_forms/publications/codes_of_practice/code_of_practice_for_avoiding_danger_from_overhead_electricity_lines.html.

The proposed development has been designed to ensure that residential dwellings' proximity has the relevant clearance (30-metres) either side of the centre line of a pylon for the 220 Kv powerlines in accordance with ESB 'Code of Practice for Avoiding Danger from Overhead Electricity Lines can w– May 2019'.

12.9.10 Public lighting

12.9.10.2 Street Lighting

The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015, and further updates.

In general, for security and road safety reasons, street lighting may be provided for car and cycle parking areas, new access roads and along cycle/pedestrian routes within new developments, all as per the Council requirements. Details of the column height and spacing, and lantern type, lighting class and lux levels and energy efficiencies shall be provided. Low pedestrian lighting bollards (1 metre to 2 metre height), under rail lighting and low-level wall mounted lighting (below 4m) are not recommended along pedestrian routes on electrical safety and maintenance grounds. Where new junctions are created as a result of new developments, additional lighting poles may be required on the public roads opposite the junction. In such cases an assessment of the adequacy of the street lighting should be undertaken with details of light intensity/ lux levels provided.

Please refer to the *Lighting Report* and associated lighting drawing prepared by OCSC.

12.10 Drainage and Water Supply

All planning applications submitted shall clearly show existing and proposed water supply arrangements and surface and wastewater drainage proposals having due regard to SuDS (Refer also to Section 10.2.2.6).

The existing and proposed drainage and water supply layout drawings are included in the application and have been assessed by Uisce Eireann with a Confirmation of Feasibility received.

12.10.1 Flood Risk Management

Applications shall adhere to the policies and objectives set out in Appendix 15 Strategic Flood Risk Assessment and Section 10.7 Flood Risk while having regard to 'the 'Planning System and Flood Risk Management' Guidelines for Planning Authorities' DEHLG (2009) and DECLG Circular PL2/2014.

The Flood Zone maps accompanying this Plan and Appendix 15 should be consulted at pre-planning stage and/or prior to lodgement of planning applications.

Although the site is located in a Flood Zone C area (low risk), Roger Mullarkey & Associates have carried out a Flood Risk Assessment which is enclosed separately under the cover *Site-Specific Flood Risk Assessment*.

7.2.4 Compliance with the Other Relevant Policy Objectives of the *Development Plan*

Please see below for policy objectives of the Development that are relevant to the subject development:

Policy Objective CS11: Compact Growth

It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES).

The proposed scheme involves the development of a key underutilised site in the Glenamuck – Kilternan area, which is currently experiencing a transition and change in character from lower density housing to a mix of low and higher density developments. Therefore, the proposed development will represent compact growth, which is in accordance with Policy Objective CS11.

Policy Objective CA8: Sustainability in Adaptable Design

It is a Policy Objective to promote sustainable approaches to the improvement of standards for habitable accommodation, by allowing dwellings to be flexible, accessible and adaptable in their spatial layout and design.

A wide range of dwelling types and sizes are proposed. The needs of a variety of households will therefore be met. The following unit sizes are all proposed: 1 No. bedroom, 2 No. bedroom, 3 No. bedroom and 4 No. bedroom units, with the range of typologies split between houses and duplexes. The range of different typologies will cater for different/emerging living requirements and in terms of flexibility, the option to downsize or extend is provided for. This advantage of the adaptability of the proposed scheme will form a strong community within the development for many years to come.

Easy resident and visitor access is provided for throughout the scheme. Majority of the ground floor duplex units along the eastern and part of the northern boundary are provided with own door access from the perimeter footpaths.

The design of the buildings are all in accordance with Part M of the Building Regulations and will also have regards to the principles of universal access. This will foster an inclusive approach to the design of the built environment.

Policy Objective CA18: Urban Greening

It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).

The proposed development provides a large quantum of public and communal open space including play spaces, kick-about spaces, basketball court, pedestrian routes and seating areas. The SUDS measures include bio-retention areas, swales adjacent to roads, tree pits, permeable paving, silt-trap / catchpit manholes, hydrobrake limiting flow to the drained area Qbar greenfield rate and stone lined voided arch retention storage devices. The open spaces will also provide pathways for pedestrians and cyclists. Therefore, it is clear that the proposed development promotes urban greening and will contribute to healthy placemaking and supports the health and wellbeing of the living and working population.

Overarching Policy Objective PHP1:

That increased delivery of housing throughout the County will be subject to the Strategic Policy Objective to:

- *Align with the provisions of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.*
- *Accord with the Core Strategy set out in Chapter 2, the Housing Strategy and Housing Needs Demand Assessment for the County in Appendix 2 and/or the provisions of the future Regional Housing Need Demand Assessment.*
- *Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities.*

As set out in Section 5.2 and 6.1 of this Report, the proposed development aligns with the provisions of the NPF and the RSES. The proposed development will contribute to the new community in the Glenamuck – Kilternan area, which is currently in transition from lower density dwellings to a mix of low and higher density schemes and will provide public and communal open spaces which will serve the future residents of the scheme and the wider public.

The development will deliver 135 No. residential units in this new residential community and will thus accord with the Core Strategy by “supporting the transition to a low carbon and climate resilient County through the implementation of a compact growth agenda, increased integration between land-use and transportation, increased sustainable mobility and, the sustainable management of our environmental resources”, as set out in Section 2.4.2 of the Development Plan. The public transport in the area also has capacity to serve the proposed development which will continually be improved, however the site promotes walking and cycling given the permeable links and services proposed.

Policy Objective PHP2: Sustainable Neighbourhood Infrastructure

It is a Policy Objective to:

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

The scheme will provide much needed housing for the area, which will protect and improve sustainable neighbourhood infrastructure for the area. The scheme will be accessible and inclusive. The open spaces will be multi-functional as they will provide various spaces for toddlers, children and adults.

Policy Objective PHP3: Planning for Sustainable Communities

It is a Policy Objective to:

- *Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide' and any amendment thereof.*
- *Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2).*
- *Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/redevelopment areas and existing residential neighbourhoods.*
- *Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.*

We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the Compact Settlement Guidelines, which is detailed in Section 5.7 of this Report.

The Social Infrastructure Audit notes that:

"The baseline study identified a significant range of services and facilities which contribute to quality of life for local residents, comprising 96 No. facilities within close proximity to the subject site (c. 2 km radius). In our opinion, the area is well served with respect to many forms of social infrastructure.....As the above survey demonstrates, there is an adequate supply of healthcare, education, parks and amenity areas, playing pitches and sporting facilities available to local residents. The area has a frequent public transport links to quickly connect the subject site directly to

a wider range of facilities located in nearby Leopardstown, Carrickmines, Stepaside and Dublin City Centre.”

In addition, the public and communal open spaces are high quality, attractive and liveable spaces where the residents and/or public will have the opportunity to interact with each other ensuring an integrated community within the scheme which will create a healthy and attractive place to live.

As demonstrated in Section 5.2 and 6.0 above, the proposed development accords with the relevant policies and objectives of the *NPF* and *RSES*.

Policy Objective PHP18: Residential Density

It is a Policy Objective to:

- *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.*

The proposed development will provide much needed higher density residential units, which will contribute positively towards addressing the national housing crisis. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised.

The area is currently transitioning in character from lower density housing to a mix of low and higher density development and thus the proposed development can be appropriately assimilated into the surrounding environment.

Please also see response to Policy Objective PHP20 below which is relevant to density and height.

The following 2 No. Policy Objectives relate to Building Height:

Policy Objective PHP20: Protection of Existing Residential Amenity

It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.

Policy Objective PHP42: Building Design & Height

It is a Policy Objective to:

- *Encourage high quality design of all new development.*

- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).*

This Report has assessed the height of the proposed development, and it is considered that the proposed heights are appropriate and can be assimilated into the surrounding environment. As noted above, it is considered that the proposed scheme strikes a balance between respecting the surrounding environment and ensuring the development potential of a strategically positioned and underutilised plot is maximised. The proposed height is also in accordance with the LAP which allows height of 2-4 No. storeys at the subject site (see Section 7.1 above).

The following is also stated under Policy Objective PHP20 (black text) with a response provided underneath each point (in purple text):

A response to each point of this policy is provided below in purple:

- *On all developments with a units per hectare net density greater than 50, the applicant must provide an assessment of how the density, scale, size and proposed building form does not represent over development of the site. The assessment must address how the transition from low density to a higher density scheme is achieved without it being overbearing, intrusive and without negatively impacting on the amenity value of existing dwellings particularly with regard to the proximity of the structures proposed. The assessment should demonstrate how the proposal respects the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring uses.*

Response: The proposed net density is 44.8 dph and thus does not exceed densities greater than 50 dph referenced in the item above.

- *On all developments with height proposals greater than 4 storeys the applicant should provide a height compliance report indicating how the proposal conforms to the relevant Building Height Performance Based Criteria "At District/Neighbourhood/Street level" as set out in Table 5.1 in Appendix 5.*

Response The proposed height of the development is not greater than 4 No. storeys and thus does not require a height compliance report, as referenced in the item above.

- *On sites abutting low density residential development (less than 35 units per hectare) and where the proposed development is four storeys or more, an obvious buffer must exist from the rear garden boundary lines of existing private dwellings.*

Response: The location of the higher elements has been sensitively positioned i.e. facing the GDRS to the north and east. Glenamuck Manor to the south has a net density of 47.5 uph and thus no buffer is required. Whilst there is a single residential dwelling to the south of the site, there is sufficient existing screening on that site to act as an obvious buffer.

- *Where a proposal involves building heights of four storeys or more, a step back design should be considered so as to respect the existing built heights.*

Response: The duplex buildings range in height between 3 No. storeys and 4 No. storeys; this design ensures the maximum height of 4 No. storeys appropriately assimilates into the surrounding environment and the rest of the scheme. The floor

and roof levels of the duplex buildings vary due to the site's topography which helps to avoid a monolithic form. For example, whilst Duplex Block C is 3 No. storeys, there is a c. 1-metre difference in height between the northernmost and southernmost extent of the building.

Policy Objective PHP25: 'Housing for All – A new Housing Plan for Ireland, 2022'

It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in 'Housing for All – A new Housing Plan for Ireland, 2021'.

The proposed development will deliver 135 No. much-needed dwellings in a sustainable location which will contribute towards the delivery of housing in the Dún Laoghaire-Rathdown area. The scheme will provide housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 27 No. Part V units. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All* (please also refer to Section 5.4 of this report).

Policy Objective PHP26: Implementation of the Housing Strategy

It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028.

The scheme will provide 21 No. 1 bedroom units, 31 No. 2 bedroom units, 73 No. 3 bedroom units and 10 No. 4 bedroom units. Therefore, it is clear that a variety of dwelling sizes are provided, which will serve a wide cohort of persons and will facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 – 2028 in this built-up area.

Policy Objective PHP27: Housing Mix

It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.

The scheme will provide the following unit mix:

Unit Types	House	Duplex	Total	Unit Mix
1 Bed	-	21	21	15.6%
2 Bed	9	22	31	23%
3 Bed	46	27	73	54%
4 Bed	10	-	10	7.4%
Total	65	70	135	100%

Therefore, it is clear that a variety of unit types and sizes are provided, which will serve a wide cohort of persons.

Policy Objective PHP30: Housing for All

It is a Policy Objective to:

- *Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.*
- *Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*
- *Promote 'aging in place' opportunities for 'downsizing' or 'right sizing' within their community.*

The proposed development has been designed to be universally accessible as detailed in Section 4.3 of the Architectural and Urban Design Statement. The provision of a mix of unit sizes including some smaller 1 and 2 No. bedroom units, will provide the opportunity for downsizing within the existing community.

Policy Objective PHP31: Provision of Social Housing

It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.

Some 27 No. Part V units are proposed to be provided as part of the development. This is in accordance with the 20% Part V requirement applicable to the subject site under the Planning and Development Act 2000 (as amended). Based on 135 No. proposed units in total, this results in a requirement for 27 No. Part V units, with which the proposal complies.

Policy Objective PHP35: Healthy Placemaking

It is a Policy Objective to:

- *Ensure that all development is of high-quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- *Promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013).*
- *Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.*

A full response to the relevant Policy Objectives of the NPF are discussed in Section 5.2 of this Report and all relevant Policy Objectives of the RSES is provided in Section 6.0 of this Report. We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the Compact Settlement Guidelines, which is detailed in Section 5.7 of this Report.

The proposed development has fully considered its context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design, as discussed throughout this Report.

Policy Objective PHP36: Inclusive Design & Universal Access

It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.

The proposed development has been designed to be universally accessible as detailed in Section 4.3 of the *Architectural and Urban Design Statement*.

Policy Objective PHP37: Public Realm Design

It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.

The scheme will enhance this area and will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm. The development will provide new pedestrian connections especially, which will improve permeability for all pedestrians. A number of access points have been provided across the site to open it up and provide a more active streetscape along the GDRS, which will improve the public realm.

Policy Objective PHP40: Shared Space Layouts

It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the 'shared space' concept and guidance set out in the 'Design Manual for Urban Roads and Streets' (2013).

The development has been designed in accordance with DMURS, as demonstrated in Section 6 of the accompanying *Traffic and Transport Assessment* by Meinhardt. The subject scheme provides a public realm that prioritises ease of movement for pedestrians and bikes.

Policy Objective PHP41: Safer Living Environment

It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.

The scheme will provide a safe environment for all, particularly as the scheme prioritises pedestrian and cyclist movement and given that the scheme has been designed to be accessible for all.

Policy Objective PHP44: Design Statements

It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design

Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.

An *Architectural and Urban Design Statement* prepared by MCORM accompanies this planning application which has been prepared with reference to the *Compact Settlement Guidelines* which have replaced the '*Urban Design Manual – A Best Practice Guide*' (2009).

TRANSPORTATION

Policy Objective T1: Integration of Land Use and Transport Policies

It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high quality public transport systems. (Consistent with NSO 1, NPO 26 of the NPF, 64, RPO 4.40, 5.3, 8.1 and Guiding Principles on Integration of Land Use and Transport of the RSES)

The proposal actively encourages the use of sustainable modes of transport especially due to the site's location proximate to the Kiltiernan Village and Carrickmines Retail Park which will afford residents of the scheme the opportunity to walk or cycle to the nearby associated facilities. The scheme promotes sustainable modes of transport through the provision of permeable links through the site, which is proposed to connect to Glenamuck Manor to the south.

In addition, the permitted Kiltiernan LRD Village application will significantly improve the quality of services, facilities and amenities in the area, which will be in walking distance of the subject site via the future GLDR.

Policy Objective T11: Walking and Cycling

It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)

The proposed development will improve the public realm in the area and will provide new pedestrian and cyclist connections to the surrounding developments and the GDRS, which will improve permeability for all pedestrians.

Policy Objective T17: Travel Plans

It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)

A Mobility Management Plan has been prepared by Meinhardt.

Policy Objective T18: Car Sharing Schemes

It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.

Some 2 No. car share spaces are proposed as part of the subject development.

Policy Objective T19: Carparking Standards

It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.

The relevant parking standards of Section 12.4.5 are discussed earlier in this report.

Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits

It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.

The traffic documents have been prepared in accordance with the relevant TII's documents.

Policy Objective T27: Traffic Noise

It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.

An Acoustic Design Statement has been prepared by Wave Dynamics Acoustic Consultants which concludes that:

"A Stage 1 and Stage 2 ProPG assessment have been undertaken. As part of the stage one assessment to categorise the site, a baseline noise survey was undertaken to measure the existing noise levels. Following a review of the noise levels on the site, including the LAFmax and LAeq, the site has been characterised as low risk for both day and nighttime noise based on the existing noise levels. Consideration has been given to the Glenamuck District Distributor Road (GDDR) to the north, and the Glenamuck Link Distributor Road (GLDR) which is currently under construction (permitted under ABP reference 303945)."

*"Following the baseline survey, a noise impact assessment was undertaken, this included break-in noise calculations to predict the internal noise levels from road traffic noise and took into consideration the traffic flow data provided by DBFL Consulting Engineers, found in Chapter 9 of the EIAR report by AWN Consulting (ABP reference 303945) for the 'Do Something 2035' scenario for the Glenamuck District Distributor Road (GDDR) and Glenamuck Link Distributor Road (GLDR). Consideration has also been given to the future growth of the surrounding roads. **Following the assessment, the building envelope performance requirements were determined. The performance specification for the building envelope has been provided in this report which includes the external walls, glazing, roof and ventilation requirements.**" [Our Emphasis]*

Traffic noise levels in the area have been fully considered in the preparation of this planning application. Please refer to the *Acoustic Design Statement* for full details on the external walls, glazing, roof and ventilation requirements for the proposed residential units to ensure satisfactory noise levels for future residents.

Policy Objective T31: Accessibility

It is a Policy Objective to support suitable access for people with disabilities, including improvements to transport, streets and public spaces. Accessibility primarily concerns people with reduced mobility, persons with disabilities, older persons and children. (Consistent with RPO 9.1 and 9.10 of the RSES).

Please refer to Section 4.3 of the *Architectural and Urban Design Statement* prepared by MCORM which details how the proposed development has been universally designed.

GREEN INFRASTRUCTURE AND BIODIVERSITY

Policy Objective GIB6: Views and Prospects

It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.

There are no Preserved/Protected Views/Protected Areas at or adjacent to the subject site.

The protected views *Carrickgollogan from the Enniskerry Road* (south of Kiltiernan Village) and *Three Rock Mountain and Two Rock Mountain from the Enniskerry Road* (Sandyford-Kiltiernan area) and *Sandyford Village* are not affected by the proposed development as the subject site is located at a considerable distance from these views.

Policy Objective GIB20: Biodiversity Plan

It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2026.

The scheme will provide a planting scheme that includes a range of pollinator-friendly species to encourage biodiversity. In addition, as set out in the *Landscape Design Statement* by NMP Landscape Architects, some 311 No. trees have been proposed which will improve biodiversity whilst also providing aesthetic and/or functional characteristics.

Policy Objective GIB21: Designated Sites

It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.

The *Appropriate Assessment Screening Report* prepared by DNV concludes the following:

"In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of

*this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- *Rockabill to Dalkey Island SAC (003000)*
- *Dalkey Islands SPA (004172)*

In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required." **[Author's Emphasis]**

Policy Objective GIB28: Invasive Species

It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).

Details on invasive species are dealt with in the Ecological Impact Assessment prepared by DNV (none recorded on site).

Policy Objective GIB29: Nature Based Solutions

It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.

Included as part of the landscape plan are nature-based solutions such as natural and formal tree and shrub planting and proposed pollinator species.

OPEN SPACE, PARKS AND RECREATION

Policy Objective OSR4: Public Open Space Standards

It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents 'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities', (2009), the accompanying 'Urban Design Manual -

A Best Practice Guide', and the 'Sustainable Urban Housing: Design Standards for new Apartments', (2020).

The scheme provides high-quality public and communal open spaces. We note that the 'Urban Design Manual – A Best Practice Guide' (2009) has now been replaced by the *Compact Settlement Guidelines*, which is detailed in Section 5.7 of this Report. Please see Section 5.6 for a response to the most recent version of the *Apartment Guidelines* (2025).

Policy Objective OSR5: Public Health, Open Space and Healthy Placemaking

It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilitates people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16).

The landscape proposal incorporates a network of well-connected external spaces designed to encourage active play, exercise and social interaction, as well as passive relaxation.

Policy Objective OSR7: Trees, Woodland and Forestry

It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach.

The scheme retains as many trees as possible. A significant quantum (311 No.) of new trees are proposed to be planted throughout the scheme which will have environmental, climatic and educational benefits.

Policy Objective OSR13: Play Facilities and Nature Based Play

It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.

The proposed play strategy for this scheme provides for natural and formal play spaces throughout the development.

ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK

Policy Objective EI3: Wastewater Treatment Systems

It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.

It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic

wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution.

It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.

The proposed development is supplied by a public foul sewerage network.

Policy Objective EI4: Water Drainage Systems

It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)

The proposed development has a completely separated drainage system provided.

Policy Objective EI6: Sustainable Drainage Systems

It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).

The proposed development provides a significant amount of SuDS elements including bio-retention areas, swales adjacent to roads, tree pits, permeable paving, silt-trap / catchpit manholes, hydrobrake limiting flow to the drained area Qbar greenfield rate and stone lined voided arch retention storage devices.

Policy Objective EI9: Drainage Impact Assessment

It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council's Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).

In accordance with the requirements of the Stormwater Management Policy, an Engineering Infrastructure Report & Stormwater Impact Assessment prepared by Roger Mullarkey & Associates Consulting Engineers has been submitted alongside this application. A Stormwater Audit has also been carried out as part of the application.

Policy Objective EI10: Storm Overflows of Sewage to Watercourses

It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region's receiving waters are met in a cost effective manner.

The proposed development has a completely separated drainage system provided and no overflow of sewage is practically feasible.

Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling

It is a Policy Objective:

- *To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- *To aim to provide a supporting waste management infrastructure in the County for the processing and recovery of waste streams such as mixed municipal waste in accordance with the proximity principle.*
- *To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved.*
- *To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.*
- *To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.*
- *To require the inclusion of such centres in all large retail developments to maximise access by the public.*
- *To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities (an excerpt of which is contained in Appendix 6).*

The waste strategy for the proposed development has been designed with due consideration of Policy Objective EI12 where relevant. Please refer to the Operational Waste Management Plan prepared by DNV for details.

Policy Objective EI14: Air and Noise Pollution

It is a Policy Objective:

- *To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES)*
- *To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'.*

The Acoustic Design Statement prepared by Wave Dynamics Acoustic Consultants has given due consideration to the Dublin Agglomeration Environmental Noise Action Plan 2024-2028 and other documents as detailed in the report. In addition, the planning application

has given due consideration to best practice guidance in relation to air quality and noise pollution.

Policy Objective El15: Light Pollution

It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.

The lighting configuration has been carefully selected to achieve recommended illuminance levels whilst minimising light spill and avoiding over lighting. Please Refer to the *Outdoor Lighting Report* prepared by OCSC.

Policy Objective El19: Overhead Cables

It is a Policy Objective to seek the undergrounding of all electricity, telephone and television cables wherever possible, in the interests of visual amenity and public health.

It is the design intent to install all electricity, telephone and television cabling below ground via a ducting system for this development. When liaising with the ESB it was deemed unviable to divert the existing 220kV overhead line below ground due to cost and timelines.

Policy Objective El22: Flood Risk Management

It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (2001/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on 'The Planning System and Flood Risk Management' (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives, and all measures to mitigate identified flood risk, including those recommended under part 3 (flood risk considerations) of the Justification Tests, in the Strategic Flood Risk Assessment set out in Appendix 15 of this Plan.

A Site Specific Flood Risk Assessment is submitted with the application in accordance with the Planning System and Flood Risk Management Guidelines. The Assessment states:

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

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

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

It is concluded that a residential development is appropriate on the subject lands.

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

Based on the information available it is concluded that this site is suitable for development and has an overall low risk of being affected by flooding.” [Author’s Emphasis]

7.3 Summary

The proposed development to provide a high-quality development comprising 135 No. residential units with public and communal open spaces fully accords with the relevant Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the Glenamuck – Kiltarnan context, in the interests of sustainable development, whilst providing a scale of development that is appropriate to this suburban location.

8.0 CONCLUSION

Overall, it is our professional opinion that the proposed development will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of medium density housing development on underutilised lands in the expanding area of Glenamuck – Kiltiernan.

It is considered that the proposed development is consistent with the relevant objectives of the national and regional planning policy and the *Dún Laoghaire-Rathdown County Development Plan 2022-2028* and *Kiltiernan – Glenamuck Local Area Plan 2025*.

We trust that the submitted planning application pack is sufficient to allow the Planning Authority to fully assess the proposed development and to make a decision to grant permission for same.

Yours Sincerely,



Patricia Thornton
Director
Thornton O'Connor Town Planning

