

Planning Report

Including: Response to Pre-Planning Consultations
 Planning Policy Review

**For a Large Scale Residential Development
At Carlisle, Kimmage Road West, Dublin 12.**

PREPARED BY



November 2022

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CHAPTER 1 INTRODUCTION

On behalf of the applicant, 1 Terenure Land Limited, this planning report accompanies a planning application to Dublin City Council under Section 32D of the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021 for a proposed Large Scale Residential Development at Carlisle, Kimmage, Dublin 6.

This application has been prepared by a multi-disciplinary team as set out in the table below:

Company Name	Documents Prepared
McGill Planning Ltd	Planning Report
	EIA Screening Report
	Childcare Assessment
	Community and Social Infrastructure Audit
BKD	Architectural Drawings
	Architects Design Statement
	Housing Quality Assessment
	Building Life Cycle Report
	Schedule of Accommodation
DFLA	Landscape Drawings
	Landscape Design Rationale
BMCE	Engineering Drawings
	Traffic Impact Assessment
	DMURS Compliance Statement
	Flood Risk Assessment
	Car Park Management Strategy
	Construction Traffic Management Plan
	Infrastructure Report
	Outline Construction & Demolition Waste Management Plan
	Outline Construction Management Plan
	Outline Construction Surface Water Management Plan
	Parking Provision Report & Residential Travel Plan
	Site Specific Flood Risk Assessment
3d Design Bureau	Photomontages and CGIs
IN2	Daylight and Sunlight Analysis
	Microclimate Wind Analysis and Pedestrian Comfort Report
	Energy Analysis Report
Moore Group	Appropriate Assessment Screening
	Ecological Impact Assessment
Traynor	Operational Waste & Recycling Management Plan
Arbeco	Arboricultural Drawings
	Arboricultural Assessment, Impact Statement & Method Statement
AECOM	Townscape and Visual Impact Assessment
3D Design Bureau	CGI, Aerial & Verified Views

Table 1 Design Team and Documents Prepared

This planning report is intended to assist with the overall assessment of the application by outlining the physical and planning context for the proposal, outlining the rationale for the proposed design and layout, and also address planning policy and how the proposal is consistent with same. Whilst every effort is made to

ensure accuracy in this report, the various specialist technical reports and drawings enclosed with this application should be relied upon as the primary source material.

This planning report is set out into 9 chapters:

- Chapter 2 outlines the development description as set out in the statutory notices and provides a brief summary of the proposed development
- Chapter 3 sets out the site location and context
- Chapter 4 outlines the relevant planning history for the subject site and the surrounding area.
- Chapter 5 provides the rationale for the proposed development
- Chapter 6 includes the response to S247
- Chapter 7 assesses the proposed development against national, regional, and local planning policy
- Chapter 8 provides an overall conclusion

CHAPTER 2 PROPOSED DEVELOPMENT

Development Description

The proposed development is described in the statutory notices as follows:

1 Terenure Land Limited intend to apply to Dublin City Council for permission for a Large-Scale Residential Development at this site at “Carlisle”, Kimmage Road West, Terenure, Dublin 12. The site is accessed from Kimmage Road West. It is located to the north and east of Ben Dunne Gym, south of Captain’s Road, west of Brookfield Green and east of Park Crescent.

The development will include the construction of 208 no. social and affordable housing units (104 no. 1 bed and 104 no. 2 bed apartments) within 5 no. blocks (with blocks 4 and 5 linked throughout), ranging in height up to 6 storeys.

- **Block 1 will range in height from 4 to 6 storeys and will provide 46 no. units.**
- **Block 2 will range in height from 4 to 6 storeys and will provide 48 no. units.**
- **Block 3 will range in height from 4 to 6 storeys and will provide 46 no. units.**
- **Blocks 4 and 5 will be linked. Block 4 will range in height from 4 to 5 storeys and will provide 38 no. units while Block 5 will be 5 storeys in height and will provide 30 no. units.**

All residential units have associated private balconies/terraces to the north/south/east/west elevations.

The proposal will also include provision of 100 no. car parking, 484 no. cycle parking and 6 no. motorcycle spaces located at undercroft and surface level. Vehicular/pedestrian/cyclist access is provided off Kimmage Road West via the existing Ben Dunne Gym access route.

All associated site development works, public open spaces, podium and ground level communal open space, landscaping, boundary treatments, plant and waste management areas, and services provision (including ESB substations) will be provided. Upgrades to the Irish Water network along Kimmage Road West are also accommodated.

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

Development Proposal	Site Statistics
No. of Units	208
Unit Breakdown	104 no. 1 bed apartments 104 no. 2 bed apartments
No. of Blocks	5 no. blocks (with blocks 4 and 5 linked)
Site Area	Net: 1.25ha Gross: 2.34ha (including Irish water upgrades)
Net Density	166.4uph
Site Coverage	43.1%
Plot ratio	1.63:1
Building Height	Up to 6 storeys
Aspect	110 no. dual aspect units (52.9%)
Open Space	1,261sqm public open space 1,619sqm communal open space
Car Parking	100 no. spaces (0.48 spaces per unit) <ul style="list-style-type: none"> - 82 no. standard spaces - 12 E.V charging spaces - 6 no. universal access spaces (6%)

Cycle Parking	484 no. spaces - 352 no. residential (incl. 16 no. cargo bike spaces) - 132 no. visitor (incl. 12 no. cargo bike spaces)
Motorcycle Parking	6 no. spaces

Table 2 Key Development Statistics

It is noted that permission was granted, under ABP 313043 on the 22/09/2022, for an SHD on the subject site comprising the exact same building heights and mix of 208 no. apartment units in 5 no. blocks. The current proposed LRD application provides a similar layout, with only minor internal alterations, and quantum of units as this permitted development.

The Inspector, in assessing the SHD Planning Application found that the development was appropriate for the location of the site. The Inspector Report goes on to say in section 16.1.6 that

“The Board considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable residential density at this location, would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would be acceptable in terms of urban design, height and quantum of development, as well as in terms of traffic and pedestrian safety and convenience. The proposal would, subject to conditions, provide an acceptable form of residential amenity for future occupants.”

CHAPTER 3 SITE LOCATION AND CONTEXT



Figure 1 Site Location

The subject site is located in a well-established suburb within Dublin City Council area. The application site is an L shaped greenfield site bounded by residential development to the north of the site along Captain's Road, east of the site along Brookfield Green, and Park Crescent to the west. All of the residential developments have rear gardens backing onto the site. A recreational facility, Ben Dunne Gym, is located along the south of the site, the Nora Dunne Art Gallery to the south, and to the southwest is the Crumlin GAA and Pitch and Putt. The site can be accessed via Kimmage Road West which also serves as an access point for the existing gym adjacent to the site.

This site does not contain any structures above ground. There are no protected structures on the site, and it is not in a conservation area or within an archaeological zone. The nearest sensitive sites include Northbrook House which is 350 metres southeast (as the crow flies) of the site and is listed on the National Inventory of Architectural Heritage. There are also National Monuments which are located over 400m away (as the crow flies) in the surrounding area of the site such as at Stannaway Avenue, containing an 18th century house, Lorcan O' Toole Park, featuring a windmill, and St. Martin's Drive, also featuring a windmill structure. The nearest Architectural Conservation Area (ACA) is Crumlin Village ACA which is c.1.2 km northwest of the site. There is an area east of the site which contains archaeological interests along Kimmage Road Lower and Poddle Park area.

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

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

Public Transport

The subject site is highly accessible and is served by seven bus routes. The bus routes connect the site with numerous places including the City Centre, UCD, Dundrum, Tallaght, and Rathmines. The site is a c. 30-min bus journey from Dublin City Centre via the Dublin Bus No. 9 route.

Bus No	Bus Route	Frequency	Key Locations
9	Charlestown Shopping Centre – Greenhills College	Every 10 min	DCU City Centre Trinity College
15a	Greenhills College – Ringsend Road	Every 15 min	Swan Centre City Centre Grand Canal Dock
17	Rialto – Blackrock Station	Every 20 min	UCD Dundrum Business Park Dundrum Hospital
17D	Rialto - Blackrock	Once Daily	Dundrum Various Schools
54A	Marlfield – College Street	Every 30 min	Tallaght Hospital City Centre
83	Harristown – Stannaway Avenue	Every 15 min	Swan Centre Trinity College City Centre Philsborough Shopping Centre
83A	Harrison – Stannaway Avenue	Every Hour	City Centre Trinity College

Table 3 Bus Routes serving the subject site



Figure 2 Existing Bus Stops close to the subject site

The planned Bus Connects project will further improve these existing bus services as seen in image below as the S4 and F3 route will implement improvements along Kimmage Road West which provides access to the site.

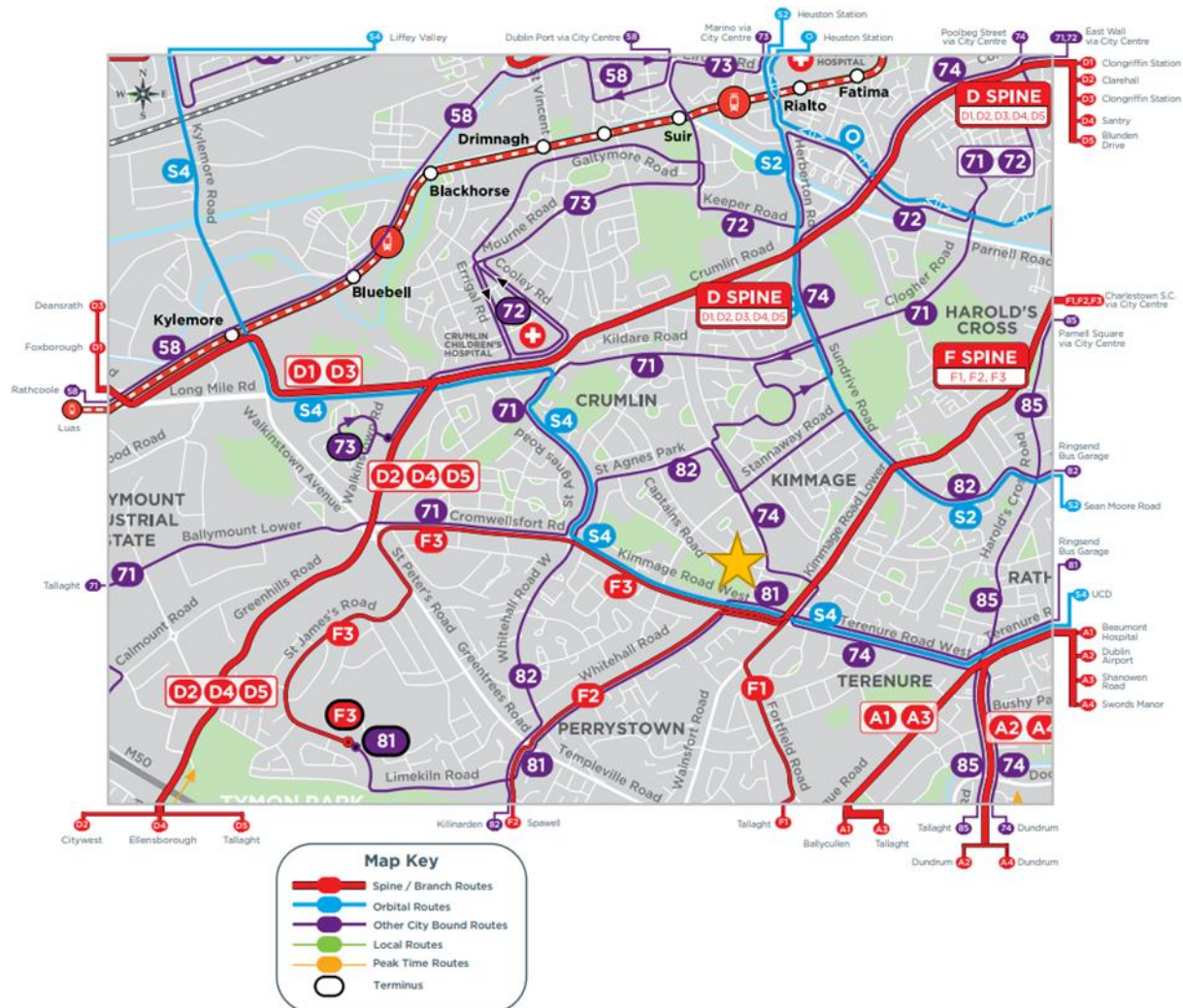


Figure 3 Bus Connects Crumlin area map (Source Bus Connects). Subject site indicated by yellow star.

Existing cycle facility lanes are provided along Kimmage Road Lower and Bunting Road which lead onto Kimmage Road West. These existing cycle facilities ensure that the subject site is easily accessible from these regional roads. This has ease of access to C3 cycle lane routes.



The subject site is within walking distance of a multitude of services, local amenities and employment opportunities.

- The neighbourhood centre at the junction of Kimmage Road Lower and Kimmage Road West is located c. 400m south-east of the subject site. A Londis is provided in this centre for immediate convenience goods.
- The neighbourhood centre at the junction of Kimmage Road West and St. Agnes Road is located c. 950m west of the subject site. The Ashleaf Shopping Centre is located immediately south of this neighbourhood centre and is the largest retail facility close to the site. It is a c. 13 minute walk and has a range of shops, takeaways, restaurants and entertainment services.
- The neighbourhood centre at Ravensdale Park is c. 850m north-east of the site and includes a creche, take away, shops and a pub. We note that, due to the existing street layout, this centre is a c. 10minute walk from the subject site.
- The neighbourhood centre at Corrib Road, off Kimmage Road Lower is c. 750m from the site and includes a post office, pharmacy, Tesco express, a dental practice along with other small local businesses
- Crumlin Village, a mixed-use centre, is c. 900m west of the subject site.
- The mixed-use centre at Sundrive Road is c. 1km north of the subject site.
- The Naas Road Key District Centre (KDC 6) is located c. 2.4km, or a c. 15 minute cycle from the subject site.

Neighbourhood Facilities and Services	Distance in Kilometres	Services and Facilities
Ravensdale Park	850 m	Pub, Takeaways
Terenure Road West (KCR Londis)	400 m	Convenience, Pharmacy
Kimmage Road Lower/Corrib Road	750 m	Convenience, Pharmacy, Post Office, Dentist

Crumlin Cross Roads	1.1 km	Medical Centre, Pharmacy, Retail, Convenience
Cromwellsfort Road/Cherry Grove	1.4 km	Medical Centre, Convenience
Kimmage Road West/Fortfield Road	600 m	Post office, Convenience
Whitehall Road/ Whitehill Road West	1.2 km	Takeaway, Convenience, Pharmacy
Whitehill Road/ Rockfield Avenue	1.4km	Pharmacy, Post Office, Convenience
Mixed Services Facilities	Distance in Kilometres	Services and Facilities
Sundrive Road/Kimmage Road Lower	1.5 km	Range of Services
Crumlin – St Agnes Park	1.4km	Range of Services
Future Development of District Centre		
Ashleaf Shopping Centre Area	1.1km	Range of Services

Table 4 Neighbourhood Facilities

In addition to these centres, which provide an array of employment for the area, there is a number of large employment centres in the area.

- KCR Industrial Estate is located c. 150m north of the subject site. Due to the existing street layout, this estate is a c. 11minute walk or c. 5minute cycle from the subject site.
- Cashel/Stamway Drive Estate is located c. 290m north of the subject site. Due to the existing street layout this estate is a c. 17minute walk or c. 7minute cycle from the subject site.
- Ballymount Industrial Estate is c. 2.1km west of the subject site.
- DIT (Rathmines Campus) is c. 2.7km east of the subject site.
- John F Kennedy Industrial Estate is c. 3.3km north-east of the subject site.
- Western Industrial Estate is c. 3.8km east of the subject site.
- Trinity College Dublin is c. 4.4km north-west of the subject site.
- Dublin City Centre is c. 3.8km north of the subject site.
- Dublin Docklands is c. 5.5km north-east of the subject site.

Employment Centres	Approx. Cycling Time from Site
KCR Industrial estate	c. 5 Minute cycle
Cashel/ Stamway Drive Estate	c. 7 Minute cycle
Ballymount Industrial Estate	c. 11 Minute Cycle
DIT (Rathmines campus)	c. 12 Minute Cycle
John F Kennedy Industrial Estate	c. 16 Minute Cycle
Western Industrial Estate	c. 18 Minute Cycle
Trinity College Dublin	c. 18 Minute Cycle
Dublin City Centre	c. 23 Minute Cycle
Dublin Docklands	c. 26 Minute Cycle

Table 5 Employment Centres

Public Parks and Recreation Facilities

A variety of existing leisure amenities exist in the local area such as parks, Ben Dunne Gym adjacent to the subject site, Crumlin GAA club at both Park Crescent and Pearse Park, Robert Emmets GAA club, Crumlin swimming pool, Green Hills Community Sports and Leisure Centre and Portobello GAA club.

In addition to the public space provided within the scheme, the site is located within 2.5 km (c. 30-minute walk) from a range of large public parks. Stannaway Park is 750m walking distance from the site while Poddle Park is within 400m of the site and is an attractive linear park leading to Tymon Park. There are also William Pearse Park, Bunting Park, and Beechfield Park which are all larger parks within a 20 minute walk, or 2km of

the site. The table below provides the walking time and cycling time from the subject site to each of the parks within 2.5km of the subject site.

There are also a series of smaller parks and green spaces within the surrounding estates. There are also areas of large public open spaces within housing estates within 5 minutes' walk of the site

Public Parks	Walking Distance from Site	Cycling Distance from Site
Poddle Park	c. 5 Minute Walk	c. 2 minutes cycle
Stannaway Park	c. 9 Minute Walk	c. 4 Minute Cycle
Sunshine Park	c. 14 Minute Walk	c. 4 Minute Cycle
Beechfield Park	c. 22 Minute Walk	c. 6 Minute Cycle
Mount Argus Park	c. 21 Minute Walk	c. 5 Minute Cycle
Glendowne Avenue Playground	c. 26 Minute Walk	c. 7 Minute Cycle
William Pearse Park	c. 24 Minute Walk	c. 7 Minute Cycle
Eamonn Ceannt Park	c. 24 Minute Walk	c. 6 Minute Cycle
Bunting Park	c. 26 Minute Walk	c. 7 Minute Cycle
Bushy Park	c. 28 Minute Walk	c. 8 Minute Cycle
Eaton Square Park	c. 28 Minute Walk	c. 8 Minute Cycle
Herzog Park	c. 30 Minute Walk	c. 9 Minute Cycle
Kenilworth Square	c. 29 Minute Walk	c. 8 Minute Cycle
Harold's Cross Park	c. 29 Minute Walk	c. 8 Minute Cycle

Table 6 Public Parks within 2.5km of subject site

Education Facilities

As set out in the Community and Social Infrastructure Audit submitted with this application, there are 2 no. primary schools, 1 no. post-primary school, 1 no. special school and 1 no. third level education facility within 750m to 1km of the subject site. There are a further 15 no. primary schools and 8 no. post-primary schools within 2km of the site. In addition, extra educational facilities in the area are Crumlin Youthreach which is an education, training and employment centre and McSherry Studio Art School which specialises in art education.



Figure 5 Locations of educational facilities within vicinity

Education Facilities within 1km from subject site	
Primary Schools	Walk Time from Site
Saint Agnes National School	c. 18 Minute Walk
Scoil Úna Naofa	c. 19 Minute Walk
Post Primary Schools	Walk Time from Site
Rosary College	c. 18 Minute Walk
Special School	Walk Time from Site
Scoil Eoin	c. 19 Minute Walk
Third Level Education	Walk Time from Site
Crumlin College of Further Education (Captain's Road Campus) – Beauty Campus	c. 19 Minute Walk

Table 7 Education Facilities within 1km from subject site

As set out in the childcare assessment by McGill Planning submitted with this application, there are c. 20 no. childcare facilities operating within a short distance from the subject site. 12 no. of these are located within 1km of the site. Between these facilities there are c. 8 spaces currently available to meet the childcare need for the area.

CHAPTER 4 PLANNING HISTORY

There are two previous planning applications which include the subject site within their red line boundary. However, neither of these two applications proposed any works on the subject site. The details of these two applications are provided below.

DCC Reg. Ref.: 2963/07

Decision Date: 27th June 2007

Decision: Grant Permission with conditions

Dublin City Council granted permission for the change of use of an existing building from sports clubhouse into a new refurbished art gallery at Carlisle Gallery, Kimmage Road West, Kimmage, Dublin 12. This development included new pitched roof at 8.2 metres in height, new parking (74 spaces) and associated site works and landscaping. Portions of existing clubhouse were to be demolished.

This building is located east of the access road into the subject site.

DCC Reg. Ref.: 4292/05

Application date: 4th May 2006

Decision: Grant Permission with conditions

Dublin City Council granted permission for the retention of an extension to the car park and for the reconfiguration of the car park layout and amended vehicular access at Carlisle fitness club, Kimmage Road west; Kimmage, Dublin 12 for B. Dunne. The car park was constructed in line with a previous planning permission on the site (DCC Reg. Ref.: 4225/00) and subsequently extended and modified without consent.

ABP Reg. Ref.: ABP-313043-21

DCC Reg. Ref.: SHD0006/22

Expected Decision Date: 15th July 2022

Final Decision Date: 22nd September 2022

Decision: Grant Permission with conditions

1 Terenure Land Limited was granted permission with conditions for a Strategic Housing Development (SHD) at Carlisle, Kimmage, Dublin 12 on the 22nd of September 2022. The table below outlines key statistics for the previously permitted SHD. As will be noted this is the same as the LRD. The only changes between the two are internal layouts to some of the two-bedroom apartments.

Development Proposal	Site Statistics of SHD	Site Statistics of LRD
No. of Units	208	208
Unit Breakdown	104 no. 1 bed 104 no. 2 bed	104 no. 1 bed 104 no. 2 bed
No. of Blocks	5 (blocks 4 & 5 linked throughout)	5 (blocks 4 & 5 linked throughout)
Site Area	Gross site area: 2.34 ha Nett site area: 1.25ha	Gross site area: 2.34 ha Nett site area: 1.25ha
Net Density	166.4 units/ha	166.4 units/ha
Site Coverage	43.1%	43.1%
Plot ratio	1.64:1	1.64:1
Building Height	Up to 6 storeys	Up to 6 storeys
Aspect	52.9%	52.9%
Open Space	Public open space: 1261 sq.m	Public open space: 1261 sq.m

	Communal open space: 1619 sq.m	Communal open space: 1619 sq.m
Car Parking	100 spaces	100 spaces
Cycle Parking	484 spaces	484 spaces
Motorcycle Parking	6 spaces	6 spaces

Table 8: Key Statistical Changes between the previous SHD and proposed LRD

The SHD planning notice stated:

- 1 Terenure Land Limited intend to apply to An Bord Pleanála for permission for a Strategic Housing Development at a site at “Carlisle”, Kimmage Road West, Terenure, Dublin 12. The site is accessed from Kimmage Road West. It is located to the north and east of Ben Dunne Gym, south of Captain’s Road, west of Brookfield Green and east of Park Crescent.
- The development will consist of the construction of 5 no. blocks (with blocks 4 and 5 linked throughout), ranging in height up to 6 storeys.
- This will provide 208 no. residential units (104 no. 1 beds and 104 no. 2 beds). All residential units have associated private balconies/terraces to the north/south/east/west elevations.
- Provision of 100 no. car parking, 484 no. cycle parking and 6 no. motorcycle spaces located at undercroft and surface level.
- Vehicular/pedestrian/cyclist access is provided off Kimmage Road West via the existing Ben Dunne Gym access route.
- All associated site development works, public open spaces, podium and ground level communal open space, landscaping, boundary treatments, plant and waste management areas, and services provision (including ESB substations) will be provided. Upgrades to the Irish Water network along Kimmage Road West are also accommodated.

DCC submitted a ‘Chief Executive’s Report’ to ABP in accordance with the requirements of Section 8(5)(a) of the Planning and Development (Housing) and Residential Tenancies Act 2016. This report from DCC concluded that the proposed residential development “is acceptable in principle in the context of the Z1 zoning objectives of the City Development Plan and the objectives for making efficient use of vacant land in sustainable locations.”

The Chief Executive Reports planning assessment responded positively to various aspects of the proposed SHD scheme. The following bullet points outline positive remarks made by DCC throughout the Chief Executive Report:

- In relation to Zoning the Council stated that the residential use proposed is permissible on a site zoned under Z1 ‘Sustainable Residential neighbourhoods’. Overall the Council insisted that “The redevelopment of this vacant site that is zoned Z1 for residential development is welcomed and considered to represent a more efficient use of the lands that are located within an existing mature residential area, that is located on a bus route, the services and amenities of Kimmage and Crumlin and a short walk from Stanaway Park.”
- DCC Development plan does not contain maximum standards for densities and therefore it is the Council’s discretion to determine if the density proposed is acceptable. The Council notes the high density proposed on the site but considers “that the site is suitable for high density development given the location adjacent to a number of bus routes.”
- The Council responded positively to the architectural approach of the scheme as the report states: “The overall design approach is contemporary that sits well within its receiving environment. There are variances in materials that provide visual interest and helps to contribute towards breaking up the overall scale and visual impact of the development.”
- Although the proposed SHD scheme contravened the Development Plan in terms of building height the council considered “that the proposal in relation to its height is acceptable”.

- Separation distances were modified from the SHD pre-application stage, the Council welcomed these revisions, *“particularly on the western side of the site adjacent to Brookfield Green.”*
- The executive report clarified that all residential standards were met or exceeded recommended standards in relation to floor areas, dual aspect, floor to ceiling height, lift and stair cores, storage, private open space, communal open space, public open space and communal facilities.
- A creche was not proposed within the scheme however the council considered this *“reasonable”* as a result of *“the high level of one and two bed units proposed.”*
- The retention of Category B2 trees along the northern and western boundaries of the site *“is welcomed and will provide some level of cover for the existing neighbouring properties to the North of the site at Captains Road.”*

Similarly, An Bord Pleanála viewed the proposed development of 208 units positively. On the 22nd of September 2022 ABP issued an order which granted permission for the proposed development with 21 conditions attached. The inspector’s report issued concluded the following: *“I consider the principle of development as proposed to be acceptable on this site. The site is suitably zoned for residential development, is a serviced site, where public transport, social, educational and commercial services are available. The proposed development is of a suitably high quality and provides for a mix of one- and two-bedroom apartments which are served by high quality communal open space.”*

When determining the application, the Inspector reviewed key aspects of the development which give clear direction with regards to issues raised within the development. These are reviewed in detail below:

Principle of Development:

The inspector was *“satisfied that the development is in accordance with the Z1 zoning objective.”* Although concerns were raised in relation to a small proportion of the site being zoned as Z9, the inspector confirmed that this was of no concern as the use of this small section of Z9 lands facilitates the development.

Development Height:

Both the Planning Authority and the Inspector had no objection to the proposed height at this location. The inspector stated that they were *“satisfied that the proposed development demonstrates that it complies with the criteria set out in Section 3.2 of the ‘Urban Development and Building Height’ guidelines and recommend that the Board grant permission for the development having regard to SPR 3, in addition to NPO13 and 35 – which seek to improve urban areas through suitable regeneration and increased densities/ height.”*

Design and Layout:

With regards to the design and layout the inspector was *“satisfied that the design of this aspect of the development is acceptable.”* The inspector specifically outlined that *“the staggered nature of the two blocks and their overall design ensures that they are not monolithic. The submitted photomontages do not give rise to any concern in relation to this aspect of the development.”*

The proposed design is considered to be acceptable for this location. The site is constrained by the available site layout and the applicant has proposed a suitable scale and density of development on this site. There is no reason to recommend a refusal of permission to the Board in terms of the proposed design and layout.”

Visual Impact:

The inspector believed that *“the proposed units are considered to be visually acceptable and will integrate into the established urban area.”* The Inspector concluded that separation distances between proposed buildings and the existing houses to the north and east were acceptable. The staggered height of the development ensured that the visual amenity of existing residents would be protected.

“The separation distance between the proposed development and the existing houses to the north and east is considered to be acceptable. All elevations facing existing houses are below the Dublin City Council specified height of 16 m. Whilst the overall units are greater than 16 m (21.2 m to top of plant in block 03), the staggered heights of the development ensure that visual amenity is protected.”

The proposed units are considered to be visually acceptable and will integrate into this established urban area. There is no reason to recommend a refusal of permission to the Board in terms of the impact on visual amenity.”

Residential Amenity:

In terms of residential amenity, the Inspector concluded that *“The proposed development provides for an adequate mix of unit types. The area consists predominately of family sized homes and the development provides for a mix of one- and two-bedroom units, thereby improving the mix of housing types in the area. The internal layout of these units is acceptable and complies with recommended requirements.”* Furthermore, the development also provides *“adequate private, communal, and public open space areas.”*

Daylight and Sunlight:

The Inspector provided a comprehensive conclusion in terms of Daylight & Sunlight. The Inspector considered that the proposed development *“is restricted by its orientation and by the existing site size/ layout.”* The inspector further explains that considering the site’s limitations *“the proposed development will provide for good daylight and sunlight to the proposed units.”* The inspector had regard to the design and layout of the scheme, the accessibility and serviced site as well as the acceptable level of residential amenity supplied for future occupants. The Inspector concluded: *“I have taken account of compensatory measures provided as part of the development such as the provision of balconies which are provided with good sunlight amenity, good, landscaped areas, good internal floor space, and the location of the site provides for a good range of services/ amenities. These compensatory measures are considered to be sufficient in this instance.”*

Daylight & Sunlight on Neighbouring Properties:

In relation to the impact on neighbouring properties, the inspector noted that *“existing units and their private amenity spaces will receive adequate sunlight, in accordance with the BRE Guidance. I have no reason, therefore, to recommend to the Board that permission be refused”*.

The inspector also noted that the Dublin City Development Plan 2016-2022 had no specific restrictions regarding separation distances for taller buildings other than to ensure that residential amenity is protected. The inspector identified that *“at no point is the separation distance less than 24.5 m and this is greater than the standard of 22 m between directly, opposing first floor, rear windows. The provision of stepped floors (four storeys to the north elevation) and design features that reduce the potential for overlooking, will ensure that the privacy of the houses on Captain’s Road are maintained. The extension of some of these houses at first floor level is noted, however, there is a level of risk in undertaking such work and a reduced amenity would be included in such development”*.

Overall, the Inspector stated that they are *“satisfied that the development will not have an unduly negative impact on the existing residential amenity of the area. The site is zoned for residential development, is located*

in an established urban area and with access to existing services. I have no reason, therefore, to recommend to the Board that permission be refused due to impact on the residential amenity of the existing area”.

Childcare Provision:

The Inspector agreed with the conclusion of the Childcare Demand Assessment submitted, that a childcare facility is not required on site. The inspector also reiterated that *“The proposed development provides for one- and two-bedroom units and the likely demand for childcare has been demonstrated to be very low.”*

Transportation, Traffic and Parking:

The Report stated: *“The development is located in an area with good public transport provision, and which is accessible within walking distance of the site. Car and bicycle parking provision is appropriate to the scale and nature of development proposed. 12 EV parking spaces are proposed, and this is considered to be acceptable, though provision should be made for all spaces to be able to provide for EV parking if necessary in the future. I have no reason to recommend a refusal of permission to the Board.”*

Infrastructure & Flood Risk:

The Report stated: *“The site is served by a public water supply and the public foul drainage network. Wastewater will be treated at the Ringsend WWTP and having regard to the submitted information, there is no concern in relation to this facility been able to treat the foul water from this relatively modest development. The submitted flood risk assessment is thorough and no issues of concern have been raised. I note the comments made by third parties in relation to flooding, however I am satisfied that the development can proceed without giving rise to flooding issues in the area. I have no reason to recommend a refusal of permission to the Board due to infrastructure and flood risk.”*

Social Infrastructure and Part V Social Housing Provision:

In terms of social infrastructure, the Inspector noted that *“the area appears to be well served by social, education, community and retail facilities”* and that *“the surrounding area is a well-established urban setting and opportunities for infill development such as that proposed are somewhat limited”.*

Wind Microclimate:

In terms of wind microclimate and pedestrian comfort, the Inspector noted that the proposal would *“not negatively impact on neighbouring developments”* and that the *“submitted details are noted and give rise to no concerns”.*

Open Space Provision

The Inspector noted that the proposal includes 1,261sqm public open space which exceeds the 10% requirement in the Dublin City Development Plan. In addition, the inspector noted that the *“footpaths through the open space are not necessary to access the site etc. and form part of the amenity of this area of the site. They can be included as part of the open space as incidental to its use”.* The inspectors report notes that the proposal *“provides for a suitable area of communal and public open space and which would be useable by residents of the development”.*

CHAPTER 5 RATIONALE

The current proposed development will comprise the following:

- A Large-Scale Residential Development with 208 residential units (104 no. 1 bed and 104 no. 2 bed apartments) all of which have terraces or balconies. These balconies face either north, south, east or west.
- The buildings will range in height up to 6 storeys.
- All associated site development works, vehicular accesses, landscaping (including public and communal open space), boundary treatments, green way, new public plaza, car and cycle parking (at surface and undercroft), bin stores, substations and service provision.

This is a residentially zoned site located within a long-established and well served residential area. The site has access from Kimmage Road West with ease of access to frequent bus services, shops, employment and community facilities. It is an ideal site for higher density residential apartment development at this serviced, accessible and highly sustainable location.

Differences between the permitted SHD and the proposed LRD Development

The proposed layout and overall LRD scheme are the same as the permitted SHD (ABP ABP-313043) on the site. The scheme will now provide exclusively for social and affordable housing which is planned to be managed by Co-operative Housing Ireland. The only change to the layout from the permitted scheme is that the en-suites previously included in the majority of two bed units have now been excluded and larger walk-in-wardrobes are now provided in their place. 8 no. of the two bed units will remain as permitted with en-suites.

Overall Layout

The residential buildings are set out in five blocks ranging in height up to 6 storeys. The proposal includes the creation of a new public open space to the southeast of the site, adjacent to block 5. A communal open space is proposed to the west at ground floor level, to the east of blocks 4 and 5 at ground floor level, and at podium level between blocks 1 and 2 and blocks 2 and 3. Car parking is predominantly in the undercroft with some surface car parking adjacent to block 4 and 3. Cycle parking is provided at surface and in the undercroft.



Figure 6 Extract of typical floor plan layout by BKD

Density

The proposed net density of 166.4 uph is higher than the existing low density, two storey suburban residential development in the surrounding area. However, this density has been confirmed as acceptable under the SHD development by both DCC and ABP, and is in accordance with the provisions of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)* (the Apartment Guidelines). These guidelines require that sites within a 5-minute walking distance of urban bus services are generally suitable for higher density development that may consist entirely of apartments. In line with the Apartment Guidelines and given the proximity of the site to public transport, shopping, community facilities and employment locations, the proposed density is considered to be appropriate and will ensure the delivery of the most sustainable form of development, making the best use of this scarce resource, zoned serviced land.

Unit Mix

The proposed unit mix breakdown is as follows:

Unit Size	No. Of Units	Percentage
1 bed	104	50%
2 bed	104	50%
Total	208	100%

Table 9 Proposed Unit Mix

This proposed housing mix is in accordance with section 2.4 of the Apartment Guidelines, which notes that intermediate urban locations, such as this one, are *generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments*. This mix has been confirmed as acceptable to DCC in the Chief Executives Report to the SHD application.

The existing wider area is generally characterised by low density two storey suburban housing providing three and four bed housing. The provision of more apartments, which are smaller in size, is reflective of the current demographic change in Ireland towards smaller household sizes. This proposal will provide for a greater diversity and choice of housing in this area overall.

Dual Aspect

The proposal includes 52.9% dual aspect, which is in compliance with the Development Plan and the requirement set out in SPPR 4 of the Apartment Guidelines for dual aspect units on intermediate urban site, such as this. All these units are true dual aspects. There are no single aspect north facing units.

Housing Quality Assessment

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

Building Height, Design, Scale and Massing

The proposed development is set out in five residential blocks, which are orientated in a north-south direction. This enables the site to maximise the daylight and sunlight entering the apartment from the optimal directions of east or west. It also ensures that the public and communal open spaces achieve a high level of daylight and sunlight to the amenity spaces.

The blocks range in height up to 6 storeys, the same as the permitted development which DCC found to be acceptable on this site. All the buildings step down along the northern boundary to break up the massing and reduce any potential impact the development may have on the properties along Captains Road. In addition, blocks 4 and 5 (which are linked) are only up to 5 storeys in height to ensure that the development steps down to the existing residential development along Brookfield Green. Along the southern boundary the elevation varies in height from 1 to 6 storeys, with stairs from the southern walkway to the communal open spaces at podium level. There are no adjoining residential units on this southern boundary, which is a gym surrounded by car parking and as such is less sensitive in terms of privacy and daylighting. The variation in heights provides visual interest in the buildings when viewed from the south.



Figure 7 extract from architects design statement indicating the variation in building heights

The buildings have also been centrally located within the site away from the surrounding northern, eastern and western boundaries to protect the existing amenities of the neighbouring residential developments site. The blocks are sited closest to the southern boundary as this is the least sensitive boundary. To the west, Block 1 is over 24m away from its nearest neighbour. Block 4 is located over c.24m away at its nearest point to the north and over 28m away at its nearest point to the east. Blocks 2 and 3 are also located in excess of c. 24m from the neighbouring properties to the north. These distances and the orientation of the existing and proposed buildings relative to each other, the treatment of the northern gables and the balconies will result in the amenities of the neighbouring properties being protected.

There are attractive communal spaces within the proposed development located at podium level in between blocks 1 and 2 and blocks 2 and 3, and at ground floor level to the west of block 1 and to the east of block 5.

These distances between proposed blocks are such that the privacy of future occupants are protected. The siting and layout of these communal spaces also ensure their semi-private status is clearly identified. Appropriate planting will be provided to protect any private balconies that abut these spaces.

Public open space is provided to the south and east of the site, adjacent to block 5 and to the north of the existing Nora Dunne Gallery. The rationale for providing it in this location was due to its proximity to both the former art gallery and the gym opposite, providing an adjacency of use and ensuring ease of access to the wider public.

Daylight, Sunlight and Shadowing

The location of the buildings and the gradation in height optimises light to the open spaces within the development. The apartment blocks take advantage of the site's orientation in order to ensure that units have access to high quality daylight and sunlight. This has been confirmed by the Daylight and Sunlight analysis carried out by IN2 consulting engineers.

This analysis demonstrates that due to the orientation of the buildings and the layout of the site that all of the communal and public open spaces receive at least 2 hours of direct sunlight on the 21st March for over 50% of their area in line with the guidelines.

It also found that the vast majority of neighbouring properties are not impacted negatively by the development in terms of daylight and sunlight availability. The assessment is carried out on the assumption of no existing or proposed trees along the boundary, and only assess the proposed apartment blocks without any intervening landscaping. From this assessment it is found that one property, no. 33 Park Crescent, is marginally impacted in terms of daylight availability with a APSH value of 25.6% which is slightly below the target value of 27%. It is not impacted in terms of sunlight. One property, no. 31 Park Crescent, is impacted marginally in terms of sunlight but not in terms of daylight. It has a APSH of 77% which is slightly below the target of 80%. Both of these are only marginal impacts and as they neither property are impacted negatively by both daylight and sunlight but only one or the other, and in each instance marginally, it is considered that the impact is minimal.

Furthermore, the Shadow Diagrams for Equinox and Summer/ Winter Solstices for the proposed development site and its surrounding demonstrate that the proposed development does not negatively impact on sunlight to existing neighbouring amenity space.

It is also worth noting that the assessment does not take into account the large existing mature evergreen trees located along the boundary of the subject site which provides significant screening to the adjoining properties. It is noted that these existing trees would have a far greater impact now on all adjoining properties on this boundary than the proposed development would have.

An internal daylight analysis has been undertaken for all units within the development. This assessed the spatial daylight autonomy (SDA) for each room and found that 97% of the kitchen/living/dining areas and bedrooms would achieve or exceed the BRE guidance targets in terms of SDA compliance. An assessment of the Exposure to Sunlight demonstrates that 87% of the apartments are compliant.

Overall, the analysis has also found a high level of compliance across all floors with the guidelines. Where there are some rooms which are below the guidelines for SDA, appropriate compensatory measures are provided within the development including:

- Larger apartment sizes
- private amenity space for all apartments

- attractive aspect overlooking communal or public open space
- all have east, west or south aspect, with no single aspect north facing units
- large areas of communal open space.

In addition, the LKDs or bedrooms with below target Spatial Daylight Autonomy receive over 1.5 hours of sunlight. Therefore, whilst some rooms were found to be slightly below standard for daylight, the overall apartment units achieve the requisite sunlight availability for compliance.

Overlooking

The proposed development is located at appropriate distances away from existing residential development within the surrounding area. This is the same as in the permitted SHD Development. The proposed development is set back from the site boundaries to provide at least c. 24m between the proposed blocks and the existing houses to the north, east and west, with the upper floors recessed further back from the northern boundary.

All open space is located at the ground or podium level preventing undue overlooking of the adjacent neighbouring properties. The podium level open space also works to break up the massing of the apartment blocks, as viewed from the north and south while providing appropriate distances between the proposed units to ensure the privacy of future residents are protected.

Significant consideration has gone into ensuring all the proposed units have been located and oriented to ensure that there is no loss of privacy between buildings with appropriate siting of the blocks and angling of the buildings. In addition to this, where appropriate either balcony railings or the windows of the apartments have been opacified to provide further protection of the existing neighbours.

The heights of the proposed apartment blocks are stepped back with the proposed blocks up to 4 storeys at the northern boundary and up to 5 (block 5) and 6 storeys (blocks 1, 2 and 3) at the southern boundary. By graduating the building height, it ensures that the proposed development is not overbearing on the surrounding properties and will minimise any overshadowing impact. All of the blocks are more than 22m away from the existing surrounding neighbours.

Co-joined blocks 4 and 5 are staggered and step from 4 to 5 in height. The height, in combination with the staggered footprint, ensures that this building is visually interesting and cannot be considered overbearing. This is demonstrated by the photomontages submitted with this application. In addition to this the balconies all have the benefit of opaque glass railing further protecting the privacy of future occupants and existing residents in the area.

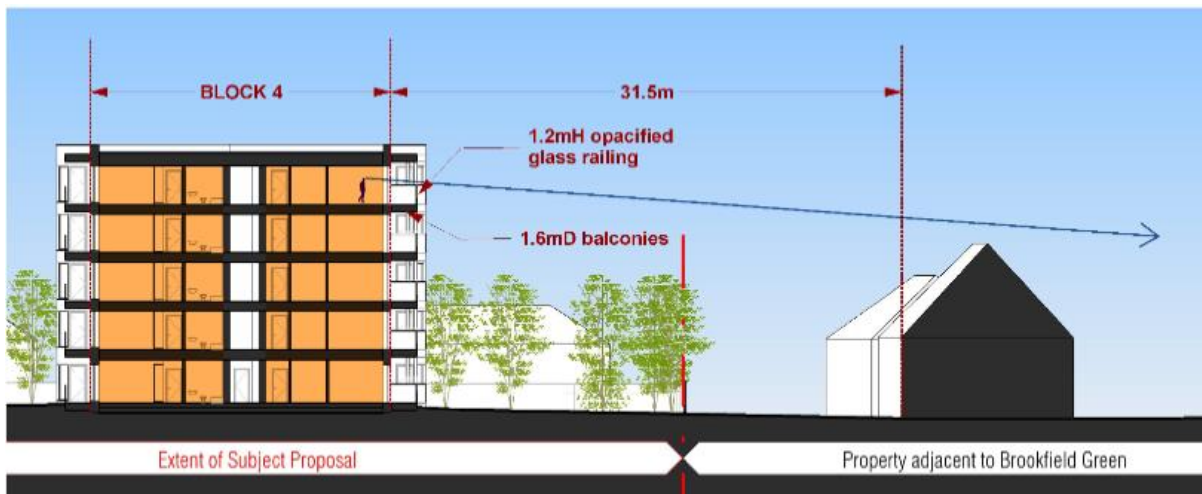


Figure 8 extract from the Design statement indicating block 4 and adjoining properties on Brookfield Green

Along the western boundary block 1 steps from 4 storeys on the northern boundary up to 6 storeys on the southern boundary. All of the existing houses are over 25m away from the proposed development and are also angling away from the proposed apartment block. There is also a substantial band of trees along this boundary which are being retained. The distance proposed along with the angling of the properties ensures that the privacy of all residents is protected.



Figure 9 Extract from Design Statement showing relationship between block 1 and Park Crescent

To the north, fronting onto Captains Road, the blocks are located between 24.8m and 31.1m away. All of these blocks are 4 storeys fronting onto Captains Road and then stepping up to 6 storeys, resulting in the top two floors being over 35m away. The north south orientation formed by the fingers of buildings, ensures that daylight permeates through the development to the rear gardens of these properties. While there are windows on these gable ends they will provide visual interest to the blocks and allow light into the apartments. However, all of these are secondary windows and are opacified as appropriate.

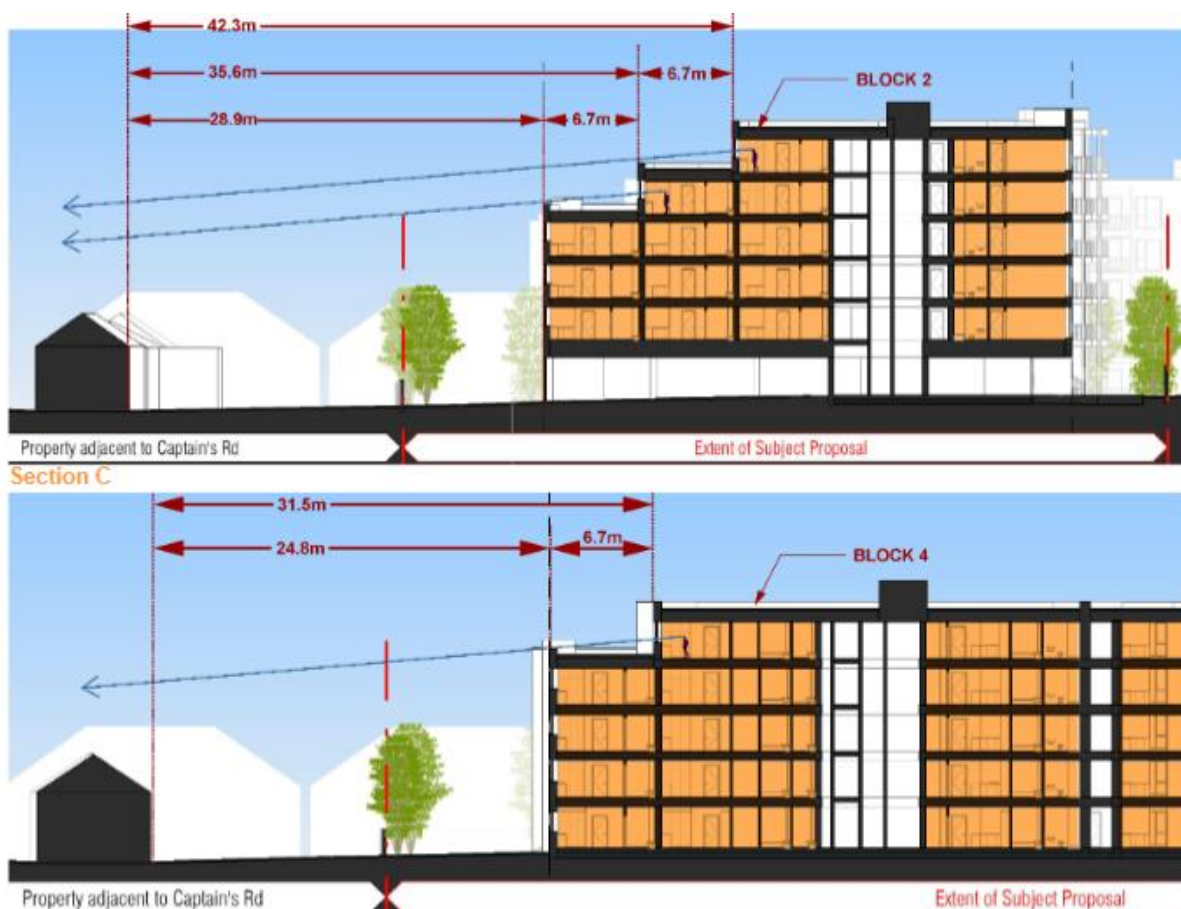


Figure 10 Extract from the Design Statement showing the relationship of blocks with Captains Road

The Design Statement and site sections prepared by BKD Architects clearly demonstrate the relationship between the proposed development and the existing properties surrounding the site.

Given the distances between the proposed development and the existing houses, the layout of the site, stepping of the buildings, and the orientation and layout of the existing buildings surrounding the site, the impact of the development in terms of overlooking is limited. The breakdown of the building through the architectural design along with the use of the materials also ensures that there is no single overbearing façade or unduly dominant building mass when viewed from the surrounding area. This is clearly demonstrated by the photomontages and also confirmed by the TVIA by Aecom.

In terms of impact on the surrounding properties in terms of overshadowing, the Daylight and Sunlight Analysis by IN2 confirms in section 6.0 that for the Equinox and Summer/ Winter Solstices that the “*development does not negatively impact on sunlight to existing neighbouring amenity spaces*”. It also demonstrates that the shading as a result of this development is transient in nature and changes throughout the day.

Open Space

The proposed development includes c. 1,261sqm of public open space and a further c. 1,619sqm of communal open space. This results in the provision of 10.1% public open space on the site in line with the requirements of the Dublin City Development Plan 2016 -2022. The communal open space exceeds the requirements of the Apartment Guideline by c. 371sqm, and measures c. 29.7% of the site.

The proposed public open space contributes to the public domain and is accessible to the public for the purposes of active and passive recreation. It is the same as that under the permitted SHD development which

did not raise any concerns for either DCC or ABP, both of whom thought it was in accordance with the Development Plan and appropriate to the area. It is considered to still be in line with the new Draft Development Plan 2022-2028 which retails the requirement for 10% site area to be provided as public open space. It is considered to be full in accordance with this requirement. However, if the planning authority is not satisfied that the proposal includes 10% public open space, a financial contribution could be provided in lieu which is considered acceptable in both the current 2016-2022 Development Plan and the draft 2022-2028 Development Plan.

The proposed public and communal open spaces provide visual breaks between and within residential areas. They also facilitate biodiversity and the maintenance of wildlife habitats.

The scheme has a site coverage of 43.1% which facilitates a significant amount of high quality, useable open space. The five blocks are designed in such a way to ensure that open space is well distributed throughout the site and easily accessible to all residents within each block.

Transport and Access

Proposed roads access, pedestrian and cyclist access to the site is from Kimmage Road West, via the existing access road, which currently serves Ben Dunne Carlisle Gym. We confirm that the applicant has the required legal interest in order to access the site via this existing road.

The proposed layout was discussed with Dublin City Council following as part of the application process for the granted SHD on site. All issues have been addressed and incorporated within the proposed layout of the planning application, and where appropriate, as in the permitted SHD development, can be addressed by way of condition if there are any outstanding concerns.

The design has also been assessed against DMURS and an independent Quality Audit, which, as set out in the Infrastructure Report, by BMCE have also been accommodated. BMCE have also completed a DMURS Compliance Statement which concludes that the proposal is consistent with the key design principles and requirements as set out in DMURS.

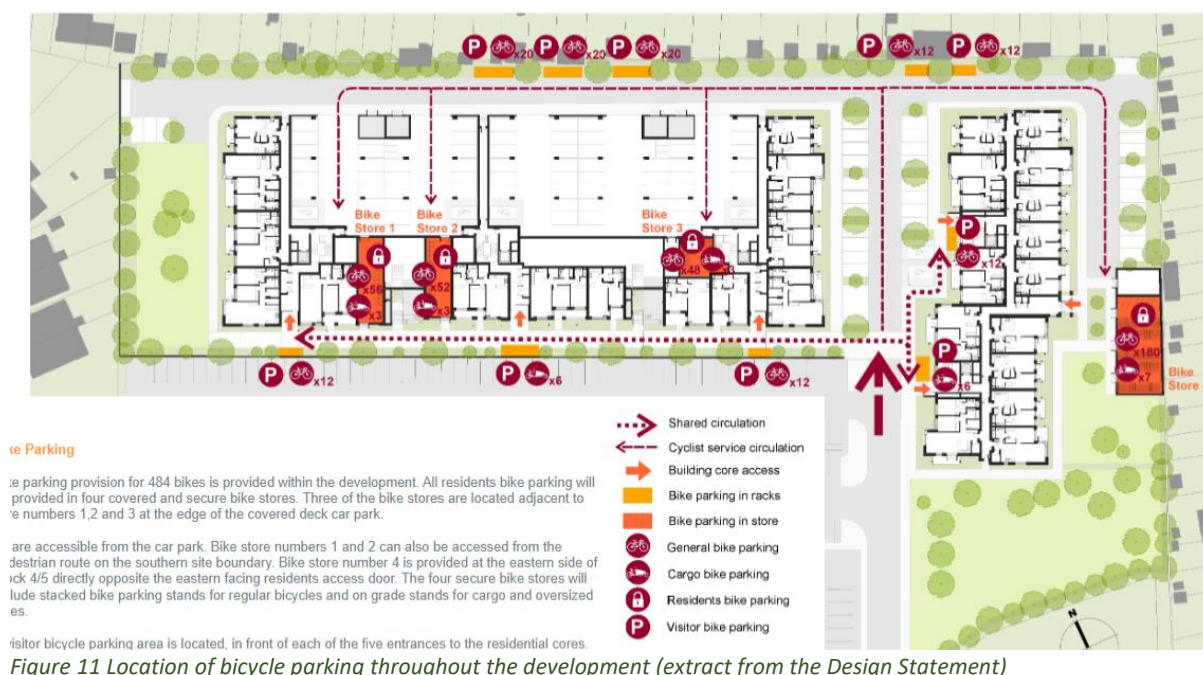
BMCE drawings provide details of upgrade works to the access road. The proposals have been assessed by Bruton Consulting Engineers in their Quality Audit submitted with this application. This includes a Road Safety Audit, Access Audit, Cycle Audit and Walking Audit. Any issues identified in the Quality Audit have been addressed in the updated drawings provided by BMCE ensuring that the development is compliant with the principles of DMURS and will accommodate safely pedestrian and cycle movements that will be generated as a result of this development.

Please see the letters of consent enclosed with this application which confirm that the proposed improvements can be completed by the applicant.

Parking

There are 100 no. car parking spaces proposed within the scheme which equates to a rate of 0.48 per unit. Of these spaces 6 are specifically dedicated to Universal Access car parking. The car parking is 48% of Dublin City Council's maximum requirements.

The proposal includes 484 no bicycle spaces (352 no. residential and 132 no. visitor spaces), which exceeds the 416 no. cycle parking spaces required by the Apartment Guidelines as well as the requirements set out in the Development Plan. This provision equates to 2.3 spaces per unit and all these spaces are accessible secure cycle parking spaces.



Barrett Mahony (BMCE) have completed a Traffic Impact Assessment, Service and Delivery Access Strategy, an Car Park Management Strategy, together with a Parking Provision Report and Residential Travel Plan, all of which support the inverse of the norm with low car parking provision and very high cycle parking.

As set out in BMCE reports the proposed development will provide more than 230% of the Development Plan cycle parking standards to enable a modal shift to more sustainable forms of transport. The reduction in the level of car parking is based on the Apartment Guidelines and analysis of the census information for the local area.

The Parking Provision Report and Residential Travel Plan highlights that, according to the 2016 census, only 41% of residents have access to a car space in the electoral divisions close to the subject site. Such evidence demonstrates that potential overspill onto the local road network will not occur with the proposed level of car parking provision and enforcement in place at the moment. It also demonstrates that c. 25% of the households within the five electoral divisions close to the subject site have no car. Furthermore, the Canal Cordon Counts demonstrate that over the past 10 years the level of car usage has decreased, with the modal split for private car usage now being below 27% for commuters, while public transport is now up at 53%. It is also noted that for the 5 electoral divisions in this area only 39% commute by car from the surrounding area.

The BMCE Parking Provision Report and Residential Travel Plan notes that these figures demonstrate that that providing car parking for 48% of occupants of the proposed development is sustainable and that the number travelling by private car has likely reduced further since 2019 and will likely reduce further to the year of opening (approx. 2024)

This approach, which caters for the demands of residents in a sustainable manner, is in line with the advice in section 4.21 of the Apartment Guidelines, which states that “in suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard”.

Furthermore, this level of car parking will encourage a positive modal shift to sustainable modes of transport thereby:

- reducing dependence on private car as a means of travel
- increasing and facilitating the number of people choosing to walk, cycle or travel by public transport
- enabling a unified approach to traffic management for the site.

Given the site's location proximity to high frequency public transport and within easy walking distances of community and retail facilities and the nature of the proposed development, it is considered that the proposed car parking standard, cyclist facilities, and pedestrian facilities are appropriate and will result in a highly sustainable development in line with National and Regional Planning Policy.

Permeability

This site is highly accessible, which, as set out in the transport section above, can accommodate a reduced level of car parking in favour of increased levels of cycle parking and pedestrian mobility. The proposal includes proposals to improve the pedestrian route into the existing gym from Kimmage Road West, with improved lighting and visibility. It also provides a new public open space which is readily accessed from Kimmage Road West.

Engineering Services and Flood Risk

The site has a net site area of c.1.25ha and has a natural slope to the eastern boundary.

There is an existing surface water drainage system to the south of the site running along Kimmage Road West. The proposed development provides for the same services as in the permitted SHD development and includes SuDs components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving. An attenuation tank is proposed to cater for storm events up to and including the 1 in 100 year, plus climate change. The surface water is proposed to outfall to the storm water sewer on Kimmage Road West to the south of the site.

The site is well served with foul sewers on Kimmage Road West to the south. Irish Water have confirmed that a connection to these existing foul sewers is feasible without upgrade.

The site is well served with watermain on Kimmage Road West to the south and Captain Road to the east. Irish Water have confirmed connection to these existing watermain is feasible, but with certain upgrade works. The proposed development has been designed to provide for these upgrade works.

In terms of flood risk, the Site Specific Flood Risk Assessment prepared by BMCE concludes that the proposed development falls in Flood Zone C and therefore, the proposed development is deemed "appropriate" in accordance with the guidelines of the OPW's publication.

Childcare

The Childcare Assessment carried out by McGill Planning provides a detailed analysis of childcare supply and demand in the area, inclusive of the proposed development. This identified that there are c. 20 no. creches operating in the area which have the capacity to accommodate 8 no. children, with further capacity available from September 2022. There are further facilities north, west and south of the catchment area, which will provide further capacity.

An analysis of the local demographics shows that 5.68% of the local population were within the 0-4 age cohort in 2016. Applying this percentage to the proposed development's expected population, and excluding the one beds and studios, indicates that there will be 33 no. children aged 0-4 living in the development. If one bed

units are excluded this reduces to 16. Based on CSO data on childcare demand, not all of these will require childcare. Taking this into account it is projected that the proposed development will create a demand for between c. 4 no. and 8 no. childcare spaces (25% of 16 no. children and a worst case scenario of 50% of all children). This demand projection is based on figures from the Quarterly National Household Survey (QNHS) Special Module on Childcare carried out by the Central Statistics Office and is discussed further in the Childcare Assessment carried out by McGill Planning.

Considering the concentration and capacity of existing childcare facilities in the area, it is considered that there is sufficient capacity within the area to cater for the additional childcare need arising from the proposed development. It is therefore considered that another childcare facility would not be appropriate or required in the area as part of this development.

Ecological Assessment

The proposed development is unlikely to have any significant effect on biodiversity. The subject site is not of significant or sensitive ecological status given its greenfield status in suburban Dublin. An Ecological Impact Assessment has also been carried out on this site by Moore Group Environmental Services. This report has found that *"There are no significant impacts predicted from the proposed development on habitats, flora, fauna or biodiversity. There will be no direct or indirect impacts on European sites identified in the potential zone of impact of the Proposed Development."*

Furthermore, an Appropriate Assessment Screening has been carried out and which concludes that *"Surface water currently goes to ground and so there is no direct connectivity with the European sites of Dublin Bay. In terms of the operational phase, wastewater from the proposed scheme will be directed to municipal sewer. Wastewater from the proposed development will be directed to Ringsend WWTP which will have the capacity to assimilate the additional load."*

There are no predicted effects on any European sites given:

- *The distance between the Proposed Development and any European Sites, approximately 6km;*
- *The lack of direct connectivity between the Proposed Development and any hydrological pathways;*
- *there are no watercourses within the Proposed Development boundary and there is no direct connectivity between the Proposed Development site and any watercourses that lead to Dublin Bay;*
- *The Proposed Development is to be connected to the existing public sewer network for the treatment of wastewater.*

There are no predicted emissions to air, water or the environment during the construction or operational phases that would result in significant effects.

It has been objectively concluded by Moore Group Environmental Services that:

- 1. The Proposed Development is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
- 2. The Proposed Development is unlikely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
- 3. The Proposed Development, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.*
- 4. It is possible to conclude that significant effects can be excluded at the screening stage.*

It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on a European site.

An appropriate assessment is not, therefore, required."

Visual Impact Assessment

Aecom have completed an independent Visual Impact Assessment for the subject site. This has been completed in conjunction with the photomontages. The Visual Impact Assessment has confirmed in section 1.9.3 that *"The highest and significant visual effects relating to the Proposed Development tend to occur at a local level, where the residents of Captain's Road, Park Crescent and Brookfield Green share a boundary with the Proposed Development site. The majority of significant effects will be experienced from viewpoint locations within the study area of approximately 200-250m radius of the site. The Proposed Development will be largely in-keeping with the existing townscape (residential) and pattern of mixed-use development of the area.*

Middle- or long-distance views beyond 200-250m in the wider study area are limited. The majority of views will become quickly partially or fully screened by intervening existing buildings. Overall, the Proposed Development will be a recognisable visual change in the neighbourhood but it will integrate into the local skyline."

ABP through its decision to grant permission has confirmed that this proposal (which is the same height, layout and scale as the permitted SHD) well-designed, well-scaled and well-positioned building for its townscape setting.

As highlighted in the report by Aecom, following the completion of the proposed works, landscape/townscape impacts will relate entirely to the development's impact on the character of the receiving landscape/townscape. The most notable landscape/townscape impacts of the application site will result from the permanent 5 no. blocks that mostly range in height up to 6 storeys. This is barely noticeable from most viewing points in the surrounding area, only appearing above the houses within the immediate surrounding road as demonstrated by the photomontages. It will not be a visually dominant feature within the wider area or landscape. This represents a compatibility with the townscape fabric and character within the vicinity of the site. This view was agreed with by the Inspector on the SHD Grant of permission.

Overall, it is considered that the proposed development is an appropriate contribution to the built fabric of this suburb that will not result in any significant townscape or visual impacts.

Part V

The proposed development is proposed to be Social and Affordable Housing. This application is supported by CHI.

It is noted that a 10% social housing proposal is submitted with this LRD application for validation purposes, however the intention is that 100% of the development will be provided for social and affordable housing. This submission of Part V details is in line with national policy, indicative costings and Part V layout are included with this application.

Microclimate Wind Analysis and Pedestrian Comfort

IN2 Consultants have completed a Microclimate wind analysis and pedestrian comfort report. This has not identified the need for any mitigation measures. It is worth noting that there are no roof terraces proposed within this development with all amenity space located at either ground floor level or at first floor level above the podium.

The report also found that *“the proposed development was determined to not unduly impact on the local wind micro-climate, with no instances of down-draft effects predicted to be introduced to the receiving environment.*

Ground level spaces within the proposed development are determined to be predominantly suited to “Pedestrian Sitting/ Standing”, in accordance with the Lawson Criteria methodology utilised. Similarly, Podium level spaces are deemed to be suited to “Pedestrian Sitting/ Standing”, and therefore suited to their intended use as amenity spaces.

All balconies within the proposed development are predicted by the Lawson Criteria methodology utilised to be suited to “Outdoor Dining/ Pedestrian Sitting”, and therefore suited to their intended use as private amenity spaces.

The proposed development is determined to not negatively impact on neighbouring developments in terms of wind microclimate and pedestrian comfort.”

Universal Design

A Universal Design Statement has been provided in section 2.9 of the Architects Design Rationale by BKD Architects which confirms access throughout the development for all people regardless of age, size, ability or disability.

Materials and Finishes

BKD Architects set out in section 2.8 of their Architectural Design Rationale provide the specific detailing of materials, elevations and external finishes to the buildings. These are the same as in the permitted development.

Sections 4 and 5 and drawing no. DR202 (Boundary Plan) in the Dermot Foley Landscape Architects Design Statement and drawing set provides specific detailing of the landscaping, paving, pathways, entrances and boundary treatments within the development. The boundary treatments have been designed following consideration of the existing boundaries around the site. The boundaries to the north, east and west remain as existing with additional planting where appropriate, while the boundary to the south has been designed in consultation with our neighbour to the south and will provide a 2.1m high wall in line with their request. These are the same as in the permitted development.

The finishes have been chosen to ensure that they are high quality, durable and sustainable finishes providing a high-quality development.

Building Lifecycle report

BKD Architects have completed a Building Lifecycle report in accordance with section 6.13 of the Apartments Guidelines, which includes the external materials and the management and maintenance of public open spaces and access routes. This report clearly sets out in section 2.2 the materials for the proposed buildings and the landscaped areas confirming that the external paved and landscaped areas will require low/ minimal maintenance. This will ensure minimal management required of these spaces. However, in addition to the choice of materials it is worth noting that, as set out in Section 1.1, a property management company will be engaged to ensure that all property management functions are dealt with for the development and that the running and maintenance costs of the common areas of the development, including communal areas of open space and any public areas are maintained appropriately.

Taking in Charge

None of the site is proposed for Taking in Charge. The area which is currently in the charge of Dublin City Council or Ben Dunne Gyms (for which we have letters of consent) will remain in the charge of the Council/Gym.

CHAPTER 6 SUMMARY OF S247 MEETINGS

Two S247 Meetings took place between the applicant's design team and Dublin City Council. The first took place on Monday 22nd August 2022 and the second took place on the 19th October 2022.

First S247 Meeting Details

Attendees

Fiona Brady (Dublin City Council)
Mary Conway (Dublin City Council)
Kiaran Sweeney (Dublin City Council)
Heidi Thorsdalen (Dublin City Council)
Niamh Fitzgerald (Dublin City Council)
Trevor Sadler (MCG Planning)
John Cooney (Lioncor)
John Maxwell (Lioncor)
Michael White (Lioncor)
Jacques D'Arcy (BKD Architects)
Paul Geoghegan (BKD Architects)
Michael Hughes (BMCE)

Notes

This meeting took place in August 2022 in the absence of any decision from ABP for the SHD development. An LRD proposal was discussed with minor amendments to the SHD scheme including the potential to reduce building heights. The council confirmed they were still in support of the development of this site, and were satisfied that it could be entirely social/ affordable housing.

Second S247 Meeting Details

Attendees

Rhona Naughton (Dublin City Council)
Eileen Buck Hart (Dublin City Council)
Marguerite Cahill (Dublin City Council)
Trevor Sadler (MCG Planning)
John Cooney (Lioncor)
Robert Miley (Lioncor)
John Maxwell (Lioncor)
Michael White (Lioncor)
Jacques D'Arcy (BKD Architects)
Paul Geoghegan (BKD Architects)
Michael Hughes (BMCE)
Michael Shine (BMCE)
Karlis Spunde (Dermot Foley)
William O'Donnell (IN2)

Notes

This meeting took place in October 2022 and was set in the context of the granted SHD development. Minor internal amendments were discussed which would facilitate the change of the development to social and affordable housing, as well as the process for proceeding with an LRD application with the same design and layout as the SHD application. The council requested that any changes to the proposed layout and design were clearly identified. Following the meeting and confirmation of the minor changes, the council confirmed they were satisfied with the approach and that the application could process directly to full application stage.

CHAPTER 7 STATEMENT OF CONSISTENCY AND PLANNING POLICY REVIEW

This chapter provides an overview of national, regional, and local planning policy which are relevant to this development and includes:

- Statement of Consistency with National and Regional Policy
- Statement of Consistency with Relevant Section 28 Guidelines
- Statement of Consistency with Dublin City Development Plan, 2016-2022
- Statement of Consistency with Draft Dublin City Development Plan 2022-2028

Through the granting of the planning permission under the SHD Application by ABP and the general support from DCC in the Chief Executives Report on the SHD it has confirmed that this proposal is in line with National, Regional and Local Plan Policy. It is also noted that the new Draft DCC Development Plan 2022-2028 as published on the website is in conformity with more recent national policies including the Building Height and Apartment Guidelines. As such this proposal is fully in compliance with the newly adopted Development Plan as written in Draft on the website (it is noted that the full new Development Plan 2022-2028 is not yet published as adopted but it is understood will be in force at the time of decision on this application.)

Statement of Consistency with National and Regional Planning Policy

The key national and regional policies relevant to the proposed development are as follows:

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Project Ireland 2040: National Development Plan (2018-2027)*
- *Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)*
- *Housing for All – A New Housing Plan for Ireland (2021)*
- *Delivering Homes, Sustaining Communities (2007) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *Climate Action Plan (2019);*
- *Climate Action Plan (2021);*
- *Regional, Spatial and Economic Strategy 2019-2031;*
- *Transport Plan for the Greater Dublin Area 2016-2035;*
- *Draft Transport Strategy for the Greater Dublin Area 2022-2042.*

Ireland 2040 Our Plan – National Planning Framework (2018)

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following aims:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- 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.

This major new policy emphasis on renewing and developing existing settlements aims to prevent the continual expansion and sprawl of our cities. This aim for Compact Growth promotes *“Making better use of under-utilised land and buildings, ... with higher housing and jobs densities, better serviced by existing facilities and public transport.”* This approach not only makes better use of land, but it can also have a *“transformational difference”* to towns and villages bringing new life and footfall to an area and contributing to the viability of services, shops and public transport, and by increasing the housing supply, enables more people *“to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less”* (section 2.6 NPF).

As a result of this new policy approach, and as set out in section 4.5 of the NPF, there is a recognition that infill, and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. As a result, to enable development a flexible approach to planning policies and standards needs to be ***“focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.”*** In particular, Section 4.5 highlights that ***“general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g., city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”*** It highlights that there ***“should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.”***

The NPF also states that that *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”*.

In terms of Dublin City and the Metropolitan Area, the NPF focuses *“on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.”*

National Policy Objective	Evaluation of Consistency
National Policy Objective 2a <i>A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.</i>	The proposed development will provide new homes within the existing built-up footprint of the Dublin.
National Policy Objective 3a <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements</i>	
National Policy Objective 4 <i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i>	The proposed development will create a high-quality, attractive, and liveable place for residents. The proposal includes varied open spaces which will contribute to the high quality of life for residents.
National Policy Objective 11 <i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people</i>	The proposal is located within Dublin suburbs. The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk or cycle from the site.

<i>and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i>	
National Policy Objective 13 <i>In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected</i>	There is clearly a strong emphasis towards increased building heights and reduced car parking standards in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height and car parking ratio is in line with government guidance and emerging trends for sustainable residential developments.
National Policy Objective 27 <i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</i>	<p>Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high quality public realm.</p> <p>A reduction in car parking spaces ensures public realm is placed at the forefront of this scheme. A larger quantity of bicycle spaces are supplied to ensure a modal shift to a more sustainable mode of transport.</p>
National Policy Objective 32 <i>To target the delivery of 550,000 additional households to 2040</i>	This proposal will provide 208 no. residential units in this sustainable location within Dublin City's metropolitan area.
National Policy Objective 33 <i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i>	The proposed scale of development is considered appropriate for this location.
National Policy Objective 34 <i>Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time</i>	All of the apartments will be fully adaptable.
National Policy Objective 35 <i>Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</i>	The proposed apartment blocks will increase the residential density of this highly sustainable area.

Evaluation of Consistency

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

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

The site is well connected to excellent public transport services. Dublin bus routes 9, 15a, 17, 17D (Go Ahead), 54a, 83 and 83a also serve the site. The planned Bus Connects Route will be located within the vicinity of the site along Kimmage Road West which provides access to the subject site.

The site is c. 1km from the Ashleaf Shopping Centre which serves as the commercial hub for the area with a range of shops, takeaways and restaurants. Within the adjoining areas of Terenure, Crumlin and Rathgar there are further additional facilities. There is a range of existing schools and community facilities in the area. It is c. 6km of O Connell Street, one of Dublin's main thoroughfares with its range of shops, restaurants and services.

In addition to the public space provided within the scheme, the site is located within 2.5 km (c. 30-minute walk) from a range of public parks including Poddle Park and Stannaway Park both within 10 minutes' walk of the site along with additional parks in the wider area.

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

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

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

Project Ireland 2040: National Development Plan (2018-2027)

The National Development Plan sets out the investment priorities as per the NPF. This will further guide national, regional and local planning and investment decisions in Ireland. Resolving the systematic factors that has led to the current housing crisis is at the heart of the NPF and therefore housing and sustainable development is a priority for the NDP. It identifies the *"need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis."*

Furthermore, the NDP states that *"the continuation of existing patterns of development accentuates the serious risk of economic, social and environmental unsustainability through, for example, placing more*

distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse”.

National Strategic Outcome 1: Compact Growth

*“This outcome aims to secure the **sustainable growth of more compact urban** and rural settlements **supported by jobs, houses, services and amenities**, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and coordinated investment in urban, rural and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This **will give scope for greater densities that are centrally located** and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. **Creating critical mass and scale in urban areas with enabling infrastructure**, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in **creating more attractive places for people** to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility

*“A step change is required under the NPF in **putting in place environmentally sustainable public transport systems** in order to secure Ireland’s climate action goals. These must represent a decisive shift away from polluting and carbon-intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and other alternatively fuelled systems for public transport fleets.*

*The **expansion of attractive and sustainable public transport alternatives to private based car** transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision **of safe alternative active travel options such as segregated cycling and walking facilities** can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure.*

Evaluation of Consistency

The proposed development will provide a new residential development on a greenfield site, which is zoned for residential development, within Dublin city. The proposal is consistency with the National Development Plan and NSO 1 for Compact Growth.

Housing for All – A New Housing Plan for Ireland

Housing for All is the government’s most recent plan for housing in Ireland. It was published in September 2021 with the overall aim that ‘everyone 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’. It includes four overarching objectives

- Supporting Homeownership 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.

This document recognises that Irelands housing system is not meeting the needs of the population. It identifies that

- There are not enough houses to buy or rent in the private sector.

- There are not enough houses being built by the State for those who need social housing.
- Housing has become increasingly unaffordable for the 'squeezed middle' who would once have expected to be able to purchase their own home.
- Too many people are experiencing homelessness or are unable to access appropriate housing.
- The cost of building housing is too high.
- Too much vacant housing stock remains unused.
- Our housing stock needs to be more environmentally friendly.

The Plan states that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households and that increased housing output is needed in all sectors – private, affordable and social.

Evaluation of Consistency

The proposed development is consistent with Pathway 3 Increasing Housing Supply. The provision of additional apartment units at this site will help achieve the target of 33,000 homes per annum.

The proposed apartments will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, local retail, recreational and associated social infrastructure.

Rebuilding Ireland – Action Plan for Housing and Homelessness 2016

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021. It was based on 5 no pillars. Pillar 3 – Build More Homes aims to increase the output of private housing to meet demand at affordable prices.

Evaluation of Consistency

The proposed development is consistent with Pillar 3 to build more housing at strategic locations. The additional apartment units will improve the quantity and mix of residential stock at a location that is particularly well served in terms of public transport, education, local retail, recreational and associated social infrastructure.

Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007

Quality Housing for Sustainable Communities (2007) is a guidance document that promotes quality sustainable residential development in urban areas having regard to the following:

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

Section 5.2 of the guidelines notes that all new housing should be reasonably accessible for older people, the very young and people with disabilities. This section also notes that in so far as practicable, the design should provide for flexibility in use, accessibility and adaptability.

The following criteria indicate the 7 no. essential requirements for new residential developments:

Policy	Evaluation of Consistency
Socially & Environmentally Appropriate “The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces.”	<p>The scheme will provide an appropriate mix of 1 and 2 bedroom apartments which will improve the housing mix available in the area.</p> <p>The proposal provides communal open spaces, shared car and cycle parking areas, and bin stores to serve the future residents of the scheme. All open spaces will be overlooked by adjoining residential blocks.</p>
Architecturally Appropriate “The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.”	<p>The proposal has been designed to respect, integrate into, and enhance the surrounding environment and context.</p> <p>The design and layout of the scheme creates a liveable and visually pleasing residential environment.</p> <p>The design is appropriate and mindful of the suburban context, the site constraints, and architectural character of the adjoining residential areas and uses.</p>
Accessible & Adaptable “There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”	<p>This dwellings in this scheme are highly accessible to all due to the provision of lifts within the scheme. The landscaping also is clearly laid out and level ensuring people can navigate easily.</p> <p>Vehicular access will be limited into the residential areas and parking is significantly reduced for this scheme. This will create a safe, pedestrian dominated development.</p> <p>The communal open spaces, residential amenity areas, and public spaces are easily accessible with clear routes and access points. This will provide ease of access and circulation for all residents.</p> <p>The internal layout of each apartment can be adapted if required to meet the changing needs of residents during the course of their lifetime.</p>
Safe, Secure & Healthy “The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation,	<p>The scheme will provide good segregation of vehicle and pedestrians/cyclists with the vast majority of car flows pushed to the northern section of the site.</p>

including access for service vehicles, should not compromise these objectives.”	<p>A very safe walking and cycling environment will be provided for residents with a network of paths located around the development.</p> <p>Public open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.</p>
<p>Affordable</p> <p>“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”</p>	<p>The mix of unit types and sizes will increase the variety of housing stock available in the area making the scheme affordable to future homeowners and to the developer.</p> <p>A management company will be established to maintain and manage the areas of communal open space, parking and bin storage associated with the apartments.</p>
<p>Durable</p> <p>“The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.</p>	<p>The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</p>
<p>Resource Efficient</p> <p>“Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”</p>	<p>The subject site is located in close proximity to public transport, education facilities, sports facilities, and retail services. There is a neighbourhood centre located c. 340m south-east, or a 15 minute walk, of the site at the junction of Kimmage Road Lower and Kimmage Road West.</p> <p>The apartment blocks are oriented in such a way, so that they have maximum solar gain. This ensures that the units and their associated private open space benefit from sunlight throughout the day. Solar panels/photovoltaic panels will be fitted to roofs to enable solar gain.</p>

Evaluation of Consistency

It is considered that the proposed development is in accordance with the above policies and criteria. In particular, we note that the proposal is in accordance with Section 5.2 of these guidelines, as required by the Development Plan.

The proposal will provide an aesthetically pleasing scheme in close proximity to existing services, facilities, and public transport, and will be an attractive and safe place to live. In addition, the apartments, public and communal spaces are all universally accessible and the apartments can be adapted to meet the changing needs of residents.

Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting
- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres

Evaluation of Consistency

The proposed development is in line with this overall vision for better integration between land-use and transport. The reduced car parking provision along with the site's proximity to Dublin City centre and to high quality public transport ensure that there will be a modal shift amongst residence in this scheme to try alternative modes of transport and reduce reliance on the private car.

Climate Action Plan 2019

Ireland's environment has directly experienced the extreme weather events. The Climate Action Plan 2019 set out a path for Ireland to transition to a low carbon and climate resilient society. The plan emphasizes compact forms of growth in development of settlements of all sizes, with a focus on urban infill and the re-use of brownfield lands. More people are envisaged to be living within existing footprint of cities and towns. The Action plan recognizes that 12.7% of Ireland's greenhouse gases were produced by built environments. A hierarchy of the most cost-effective investments underpinning emission reductions in the Built Environment, including:

- Improving the fabric of buildings
- District heating in commercial buildings
- Switching from oil burners to heat pumps
- Setting new building standards

To meet the required level of emissions reduction, by 2030 Ireland is required to:

- Reduce CO2 eq. emissions from the sector by 50–55% relative to 2030 Pre-NDP projections
- Deliver an early and complete phase-out of coal- and peat-fired electricity generation
- Increase electricity generated from renewable sources to 70%,

New buildings from latter half of 2019 are required to be designed as Near Zero Energy Building (NZEB). Better spatial planning will reduce the carbon emissions of new developments, and deliver a better quality of life, including shorter commute times, better connections between our places of work and homes, and more vibrant, people-focused environments.

To make development less transport intensive and reduce carbon emissions the key policies include expansion of walking, cycling and public transport that will promote modal shift.

Evaluation of Consistency

The proposed development has good connectivity with existing and proposed high frequency transport corridors that will reduce the commute times. The proximity to these bus routes will encourage a modal shift away towards more sustainable modes of transport.

Proposed development will employ the latest technology to provide for sustainable heating and insulation of apartments. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan.

Climate Change Action Plan 2021

The Climate Change Action Plan 2021 sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050.

Section 13.1 notes that emissions from the residential sector in 2020 increased 9% from 2019 levels, due to the increase in home working and restrictions on movement that forced more people to spend more time at home. It also notes that

"Covid-19 has also placed a focus on the need to maximise ventilation opportunities in our homes and other buildings. Therefore, it is important that when we improve the energy efficiency of our buildings, we consider it in a holistic way, and also take account of risks such as fire safety, ventilation and durability."

The Action Plan notes that the following range of further measures, in addition to those already committed to in the 2019 Climate Action Plan, will be required to reach our overall national emissions reduction targets for 2030:

- *Improving the fabric and energy efficiency of our existing buildings*
- *Rolling out zero-carbon heating solutions, predominantly heat pumps and district heating networks*
- *Planning for the full phase out of fossil fuels in buildings by 2050*
- *Progressive strengthening of building standards for all types of buildings*
- *Promoting the use of lower carbon alternatives in construction*
- *Promoting behavioural change in how households use energy*

Section 15.1 states that road transport accounts for 96% of transport greenhouse gas emissions in Ireland and that promoting cleaner, safer, and more sustainable mobility is critical for climate policy. This section identifies that *'improved planning and radical redesign is required to shift our built environment from being "vehicle centred" to being "people centred"'*. In addition, the concept of the '15-minute neighbourhood' and the promotion of communities in which people can live and access most of their daily needs within a 15-minute journey mainly by sustainable modes is identified as representative of the broad ambition to create people-centred places.

Evaluation of Consistency

The site is served by high-frequency bus routes. The proximity to these bus routes will encourage a modal shift away towards more sustainable modes of transport.

There are a wide range of facilities within a 15-minute journey from the site.

- There are three public parks within a 15 minute walk of the site including Poddle Park, Stannaway Park and Sunshine Park
- Ben Dunne Gym is adjacent to the site and Crumlin GAA Club is a 10 minute walk from the site.
- The Mount Argus Community Centre, the Kimmage Development Studies centre, and Miltown Church are all a c. 16 minute walk or a c. 4 minute cycle from the site.
- There are 2 no. primary schools and one post-primary school within 1km of the site.

Please see the Community and Social Infrastructure Audit submitted with this application for further detail.

The proposed development will employ the latest technology to provide for sustainable heating and insulation of apartments. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan.

Regional Spatial and Economic Strategy 2019-2031

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Midlands regions and-Eastern Region - have been replaced by the Eastern and Midland Regional Assembly (EMRA).

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond which is a new concept in Irish Planning tying spatial planning to economic factors. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES will support the implementation of Project Ireland 2040 – the NPF and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The RSES includes Regional Policy Objectives (RPOs) to guide development in line with the overall vision of the RSES and the NPF.

Section 4.2 sets out the RSES Settlement Strategy. The subject site is located within ‘Dublin City and Suburbs’ which are at the top of the settlement hierarchy for the region in terms of the need to ensure highly concentrated development in this highly accessible and serviced area.

Section 4.4, which deals with Dublin City and Suburbs, supports ‘*continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration*’. This section identifies that in order to achieve compact growth 50% of housing needs to be provided within or contiguous to the build-up area of Dublin City and suburbs.

Regional Policy Objective 4.3 seeks to ‘*support the consolidation and re-intensification of infill/ brownfield sites to **provide high density and people intensive uses within the existing built-up area of Dublin and suburbs** and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects*’.

The site is also located within the Dublin Metropolitan Area and is therefore subject to the Metropolitan Area Strategic Plan (MASP).

Section 5.3 sets the Guiding Principles for the growth of the Dublin Metropolitan Area. Some of these principles include:

- **Compact sustainable growth** - Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built-up area in Dublin and at least 30% in other settlements.
- **Integrated transport and land use** – Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including Bus Connects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.
- **Accelerate housing delivery**– Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.
- **Co-ordination and active land management** - enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and *land management policies that focus on the development of underutilised, brownfield, vacant and public lands*.

The RSES includes Regional Policy Objectives relating to the Dublin Metropolitan Area. RPO 5.3, RPO 5.4 and RPO 5.5 support active transport modes, increased densities, and the consolidation of Dublin city and suburbs.

MASP Housing and Regeneration policy objective RPO 5.4 states that “*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’*”.

RPO 5.5 goes on to identify that “*Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.*”

The RSES along with the NTA and Local Authorities have developed Guiding Principles for Integration of Land Use and Transport in the region. These include:

- For urban-generated development, **the development of lands within or contiguous with existing urban areas should be prioritised** over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.
- The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be

provided for, but in a manner, which complements the alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided.

- **Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.**
- Support the '**10 minute**' **settlement concept**, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
- Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.

Evaluation of Consistency

The subject development seeks to provide for significant residential development on a suburban greenfield infill site within the highly accessible location of Kimmage. The proposed development complies in principle with the locational and quantitative policies and objectives of the RSES.

Kimmage has access to high quality public transport including excellent high frequency bus services. It has excellent potential to promote sustainable mobility and achieve the vision of 'walkable' communities. The site is therefore considered appropriate for development to help with the consolidation of the area and to avoid further sprawl.

The proposed development will help to encourage a modal shift away from private car usage to more sustainable travel. The site is also in close proximity to a variety of public transport options which will help to encourage a modal shift away from car dependency and car ownership. The proposed development will benefit from its location close to significant social infrastructure and employment opportunities within walking/cycling distance or accessible by public transport. These existing destinations in the area will support the '10 minute' settlement concept promoted by RSES.

The proposal is considered in line with the RSES' aims and objectives, in particular RPO 5.3, 5.4 and 5.5.

Transport Strategy for the Greater Dublin Area 2016-2035

The Transport Strategy for the Greater Dublin Area 2016-2035 promotes the consolidation of the Metropolitan Dublin area (where the application is located) allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built-up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike. This document identifies under its primary policy, in section 2.2 that *"the Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. **This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.**"*

Section 7 states that *"the implementation of the Strategy will facilitate a more efficient use of land within the GDA. By focussing public transport investment, and investment in the cycling and pedestrian network, into the city centre, major suburban centres and hinterland growth towns, the Strategy will complement national, regional and local planning policy by promoting and enabling the consolidation of development into higher order centres... In terms of the provision of housing, the Strategy will directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.*

Evaluation of Consistency

The subject site is located on Kimmage Road West, where the M50 is c.4 km southwest of the site. Chapter 4 of this Strategy sets out transport proposals for each corridor within the GDA. The subject site is located in Corridor E of the GDA which sets out to provide a BRT to Tallaght via Rathfarnham and Terenure. The strategy states “This will result in a significant increase in capacity and reliability compared to existing public transport services and will balance public transport requirements with those of the private car. The BRT will be supplemented by a core radial bus corridor between Rathfarnham, Rathmines and the City Centre.” Kimmage is nestled amongst proposals considered for Corridor E of this strategy and will benefit hugely from future improvements.

The proximity of the subject site to existing public transport along Kimmage Road West encourages a modal shift away from car usage.

Draft Transport Strategy for the Greater Dublin Area 2022-2042

The National Transport Authority (NTA) has prepared an updated draft Transport Strategy for the Greater Dublin Area 2022-2042 to replace the previous Transport Strategy for the Greater Dublin Area 2016- 2035. The public consultation period on this draft strategy ended on the 10th January 2022.

This draft strategy has been developed to be consistent with the spatial planning policies and objectives set out in the *Regional Spatial and Economic Strategy* (RSES) as adopted by the Eastern and Midland Regional Assembly. It is also based on national policies on sustainability as set out in climate action and low carbon legislation, and in climate action plans. In addition, the short term and long term impacts of the on-going Covid-19 pandemic have been taken into account in the strategy.

Section 3.2 notes that a key focus of the strategy is to facilitate increased use of other modes in order to meet environmental, economic and social objectives related to emissions, congestion and car-dependency.

Section 3.6 notes the importance of transforming the urban environment to create a coherent priority for public transport and to provide informal public open spaces and place to relax and sit down.

Section 8.1 notes that the pattern of where people live, work, attend school or college, socialise etc. is the key determinant in the type of transport system we require.

Section 8.3 states ‘*facilitating the delivery of large numbers of new housing units of high quality and diversity, in locations which maximise the number and the range of households who can travel by public transport, walking and cycling, is a critical aspect of integrated transport and land use planning in the GDA*’.

Section 8.4 notes the importance of consolidation which *allows for new populations to emerge in areas already served by public transport and active travel modes, and where a range of social services and retail can be accessed without recourse to the private car, and without the need to travel long distances*.

The strategy also includes a number of measures to help guide development. The two most relevant to the proposed development area Measure PLAN1 and PLAN2:

Measure PLAN1

Housing and Transport: The NTA will continue to support sustainable housing provision in the GDA. SDZ Planning Schemes, Local Area Plans and large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the

majority of travel demand. They should also be accompanied by a statement setting out the infrastructure and services required to achieve this, and an agreed phasing programme for its provision.

Measure PLAN2

Consolidated Development In accordance with the NPF and RSES, the NTA will only support development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services. Peripheral development will only be considered in exceptional circumstances – on an evidence-based planned approach – and for specific land uses that cannot be accommodated in town and city centres.

Evaluation of Consistency

The proposed development is located in the highly sustainable and accessible suburban area of Kimmage with a variety of existing amenities, services and public transport options within a short distance from the subject site. The proposal will consolidation and increase the residential density of the area.

The proposed development includes a reduced car parking ratio, an increased cycle parking ratio, the provision of electric charging points for electric vehicles, and the provision of larger bike parking spaces for cargo bikes. The entrance into the site has been carefully designed to ensure it is safe for pedestrians entering and exiting the site. These measures will all work to encourage a modal shift away from car dependency and towards more sustainable modes of transport.

The application includes a Traffic Impact Assessment which outlines the existing transport infrastructure in the area.

Statement of Consistency with Relevant Section 28 Guidelines

The key Section 28 Guidelines relating to the subject site and the proposed development are as follows:

- Urban Development & Building Heights: Guidelines for Planning Authorities (2018)
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Childcare Facilities Guidelines for Planning Authorities (2001)
- Urban Design Manual: A Best Practice Guide (2009)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)
- The Planning System and Flood Risk Management (2009)
- Design Manual for Urban Roads and Streets (2019)

Urban Development & Building Heights: Guidelines for Planning Authorities, 2018

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended) ('the 2000 Act'), Planning Authorities and An Bord Pleanála are **required to have regard to the guidelines and apply any specific planning policy requirements (SPPRs) of the guidelines in carrying out their function. SPPRs, as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.**

The Guidelines emphasise the policies of the NPF to **increase levels of residential development in urban centres and increase building heights and overall density** by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála. It identifies the need to focus planning policy on *“reusing previously developed “brownfield” land, building up urban infill sites”*.

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks:

*“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, **development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors**”.*

The Guidelines go on to highlight that:

“the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.

The Development Plan was adopted prior to the adoption of these guidelines and include conflicting policies and objectives.

We note the following compliances with the Development Management criteria set out in the guidelines.

Development Management Criteria	Evaluation of Consistency
At the Scale of the Town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	<p>The site is well connected with public transport services. High frequency bus routes which service this area are bus routes 9 and 17 along Kimmage Road West.</p> <p>Route 9 runs from Charlestown Shopping centre to Greenhills College, this route passes through DCU and the City Centre allowing easy access to these major locations. This runs c. every ten minutes.</p> <p>Bus Route 17 runs from Blackrock to Rialto which allows residents to access UCD and Dundrum Business Park which are education and employment hubs. This runs at a c. 20 minute frequency.</p> <p>Route 15A runs along Whitehall Road with a frequency of c. 15 minutes at peak times. This stop is within c. 250m of the site</p> <p>Route 54A runs along Kimmage Road Lower with a frequency of c.15 minutes and is c. 600m from the site.</p> <p>These bus routes connect the site to the surrounding areas and wider Dublin area. They have a high frequency occurrence.</p>
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks and protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	<p>The proposed development seeks to deliver an appropriate form and scale of residential development at a site that is well connected to several different existing centres including Kimmage, Terenure and Crumlin. All of which provide a range of shopping, public houses, restaurants, shops and other facilities, services, and recreational uses. These are all within a kilometre of the site.</p> <p>A TVIA has been completed and submitted with this application.</p> <p>There are no protected structures or sensitive landscapes identified within the area.</p>
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	<p>The proposed development is in 5 blocks, which range in height from one to 6 storeys.</p> <p>Block 1 is located furthest to the west. It is 4 storeys at the northern end rising to 6 storeys on the south, adjacent to Ben Dunne Gym. The reduced building height at the northern boundary responds positively to the immediately adjacent neighbours to the east, on Park Crescent and</p>

	<p>north along Captains Road, which are traditional two storey residential units.</p> <p>Blocks 2 and 3 are positioned centrally in the site, linked to block 1 by a single storey podium. Again these two blocks rise to 6 storeys adjacent to the less sensitive southern boundary and step gradually down to the north, to first 5 and then 4 storeys. These graduated steps respond to the lower building height and more traditional form of building along the northern boundary.</p> <p>Finally blocks 4 and 5 are located on the eastern boundary. These two blocks are linked with block 5 stepping further west of block 4 providing a sense of enclosure to the entrance. Block 4 is 4 storey on the northern end rising to 5 and block 5 is 5 storey throughout. The position of these blocks and the stepping, again reflects the existing building height along Captains Road to the north and Brookfield Green to the east.</p> <p>The development also introduces a new public open space to the east of the site linking to the Nora Dunne Gallery.</p> <p>The variation in the height, the use of materials and the stepping/ layout of the building provides a visually interesting development which responds to the heights of the surrounding area.</p>
At the Scale of the Neighbourhood	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</p>	<p>The proposed development has been carefully designed to respond to the existing situation surrounding the site, as well as the large Ben Dunne Gym to the south. It also aims to protect the existing trees and hedges along the boundaries.</p> <p>The stepping of the buildings from the north to the south reflects a need to transition from the existing two storey residential development which surrounds the site to the north, east and west.</p> <p>The positioning of attractive 5 to 6 storey building along the southern boundary, interspersed with gaps between the buildings provides an attractive urban approach when viewed from Kimmage Road West replacing a view which is currently dominated by a sea of car parking.</p> <p>The balancing of these elements has created a development that is considered and is a positive contribution to the area and providing an attractive</p>

	development that steps appropriate to meet the neighbouring properties.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	<p>The proposal is broken into five buildings, which step in height to meet the neighbours. The size and shape of all of the blocks, along with the variation in height, and use of materials have been chosen to ensure an attractive interesting development.</p> <p>Blocks 4 and 5 have been shortened, and the building footprint has been stepped to provide a more visually interesting development when viewed from the east. As a result of this change there are no unduly long, monotonous building lines.</p>
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).	The proposal introduces a new public open space on the south east of the site, adjacent to a public gallery (currently closed) and the gym, immediately adjacent to the public access route into the site. This location has been carefully considered to provide the most accessible public open space that has a relationship with the surrounding residential areas.
Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	<p>The proposed building height, which steps down to meet the neighbours, is designed to be slightly higher than the immediate surrounding area but not to be a dominant feature on the sky line. It will only be visible from the immediately surrounding road, and further afield it will blend in with the roof line of the surrounding area.</p> <p>This is not a highly visible site, it can only be seen from the access road from Kimmage Road West and as such is considered a back-land or infill development to the rear of the Ben Dunne Gym. It is considered appropriate to maintain this approach, and as a result the building height is only 6 storeys, only slightly higher than the surrounding existing building in the area, and will not be readily visible from the wider area. It will integrate into the surrounding urban landscape in a seamless manner.</p> <p>The proposal provides a mix of communal and public open spaces throughout the scheme with ease of access for all residents.</p> <p>The proposal is largely a car free development which results in public spaces dedicated to pedestrians/cyclists.</p>
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The apartment development will significantly improve the mix of residential types in the area which is dominated by two storey housing. The proposal comprises of a mix of unit types including 104 no. 1-bed apartments and 104 no.

	2-bed apartments. The provision of these units, in a largely two storey housing area will enhance the unit typologies currently available in the area.
At the scale of site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light	The layout and design of the buildings and the gaps between them have been orientated and designed to ensure the maximum amount of natural daylight, ventilation and views within the development while also ensuring there is no loss of light or overshadowing to the existing neighbours.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'	IN2 Engineering Consultants have completed a Sunlight Daylight Analysis. As discussed above in the report, this analysis demonstrates a good level of compliance with the guidance..
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	Where non compliance does occur appropriate compensatory measures are identified for each units. In addition to the compensatory measures identified within the Daylight Sunlight Analysis which refer to individual apartments, it is also worth noting that this is a zoned residential site within Dublin. It is a highly accessible and sustainable site with a range of existing facilities within the vicinity, within easy walking and cycling distance of Dublin City Centre and other nodal points including Rathmines, Crumlin, and Terenure to name a few. The provision of residential development at an appropriate increased density is fully in line with national planning guidance. The design of the site is to provide an attractive apartment development which fits within the context of the built up environment. It is designed to provide an attractive street scene within the development and framing of the proposed communal and public open spaces.
Specific Assessments	
Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	IN2 have completed a Microclimatic Wind Analysis and Pedestrian Comfort Report. This report has found that <i>"the proposed development was determined to not unduly impact on the local wind micro-climate, with no instances of down draft effects predicted to be introduced to the receiving environment."</i> It also found that all amenity spaces, whether public or communal open space, or private amenity spaces were suited for their intended use.

	Overall it was found that it would “ <i>not negatively impact on neighbouring developments in terms of wind microclimate and pedestrian comfort.</i> ”
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	An AA and an Ecological Impact Assessment Screening prepared by Moore Group. The surveys have demonstrated that the proposed development will not significantly impact on any sensitive flora/fauna within the area. Once the landscaping proposals are implemented, they will support local biodiversity in time within the new landscaped areas and will be a net positive impact compared to leaving the site as vacant hardscaped land.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The proposal will not alter the existing telecommunication channels in the area.
An assessment that the proposal maintains safe air navigation.	The subject site is not within a flight path and is therefore not expected to impact air navigation.
An urban design statement including, as appropriate, impact on the historic built environment	A detailed Design Statement prepared by BKD Architects which demonstrates that this development is appropriate to its context and will not have a detrimental impact on the wider area or indeed the historic built environment. There are no historic buildings, protected structures or conservation areas within the immediate area of the site.
Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.	The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites. We refer to the AA Screening, the Ecological Impact Assessment and the EIA Screening Report submitted with this application.

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

Specific Planning Policy Requirement	Evaluation of Consistency
<p>SPPR 1</p> <p>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.</p>	<p>The site is well connected to good public transport services. The site is served by seven bus routes, many of which are high frequency connecting the site to Dublin City Centre, Phibsborough, Trinity College, DCU, Grand Canal Dock and Tallaght. It is also within walking and cycling distance of a range of amenities, universities, employment areas and Dublin city centre</p> <p>Therefore, the site represents an “Intermediate Urban Location” as defined in Section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) and is suitable for higher density apartment development.</p>
<p>SPPR 2</p> <p>In driving general increases in building heights, planning authorities shall also ensure</p>	<p>The proposed development provides for an apartment development along with a new public open space. It is</p>

<p>appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</p>	<p>adjacent to an existing gym and is within 500m-1km of a wide range of commercial, retail and education facilities.</p>
<p>SPPR 3 It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p>	<p>The proposal is in accordance with the Development Management Criteria as set out in the table above.</p> <p>This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p>

Evaluation of Consistency

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

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The application proposes a development ranging principally ranging in height from 1 to 6 No. storeys.

The proposed development will integrate appropriately with the surroundings, having regard to the location of the subject site within an existing built-up area in Kimmage, close to Terenure, Crumlin and Rathgar. It is well served by public transport and in proximity to employment locations, services and facilities. The set back of the building and the stepping height results in the buildings only be visible from the immediate area, but from further afield being lost within the roofscape.

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

It is also noted that An Bord Pleanála granted permission for 6 storeys on the subject site under ABP 313043 and therefore the principle of increased height has been established on this site.

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

The Apartment Guidelines promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The Apartment Guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

The Apartment Guidelines note that apartments are most appropriately located within urban areas and that the scale and extent of apartment development should increase in relation to proximity to core urban centres and other factors. The guidelines outline three types of locations:

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

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided within the Apartment Guidelines.

It is our contention that the proposed site comes under the definition of an “Intermediate Urban Location”, which the Guidelines state “*are generally suitable for smaller-scale (will vary subject to location) and higher density development that may wholly comprise apartments...*”

The site represents an Intermediate Urban Location for the following reasons:

Criteria	Evaluation of Consistency
Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions	The KCR Industrial Estate, a key employment location in the area, is a c. 10 minute walk from the subject.
Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;	The site is a c. 3 minute walk from the Dublin Bus Stop 2437. This stop is served by Dublin Bus Routes 9 which operates a peak frequency of every 10 minutes and the 15A which operates a peak frequency of 10-15 minutes.
Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.	

The Apartment Guidelines outline 9 SPPRs that take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

Specific Planning Policy Requirement	Evaluation of Consistency
Specific Planning Policy Requirement 1 Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).	The proposed apartment mix is 104 no. 1-bed (50%) and 104 no. 2-bed (50%). The mix accords with SPPR1. This unit mix is contrary to the Development Plan.
Specific Planning Policy Requirement 2 For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: <ul style="list-style-type: none"> Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the 	The subject site exceeds 0.25ha and therefore SPPR1 applies to the site. The proposal is for a development consisting of 208 no. residential units with a mix as shown in SPPR1.

<p>development (i.e., up to 4 units) comprises studio-type units;</p> <ul style="list-style-type: none"> Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; For schemes of 50 or more units, SPPR 1 shall apply to the entire development. 	
<p>Specific Planning Policy Requirement 3 Minimum Apartment Floor Areas: Studio apartment (1 person) 37 sq.m 1-bedroom apartment (2 persons) 45 sq.m 2-bedroom apartment (4 persons) 73 sq.m 3-bedroom apartment (5 persons) 90 sq.m</p>	<p>As per the Housing Quality Assessment by BKD Architects submitted the proposed unit sizes accord with SPPR3.</p>
<p>Specific Planning Policy Requirement 4 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <ul style="list-style-type: none"> (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate. (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects. 	<p>52.9% of the units are dual aspect. This is above the 50% required for intermediate urban locations. None of the single aspect units face north.</p>
<p>Specific Planning Policy Requirement 5 Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly</p>	<p>The permitted ground floor apartments have 2.7m floor to ceiling height in accordance with SPPR5.</p>

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.	
Specific Planning Policy Requirement 6 A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.	Each apartment core has less than 12 apartments per floor in accordance with SPPR6.
Specific Planning Policy Requirements 7 to 9 relate to Build to Rent (BTR) and Shared Accommodation are not relevant to the current proposal.	N/A

The Apartment Guidelines also include policies and objectives throughout for apartment developments. The elements relevant to the proposed development are included in the table below.

Policy	Evaluation of Consistency
Section 4.16 identifies that cycling “ <i>provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes.</i> ”	In line with this ambition 484 no. secure, readily accessible cycle parking spaces have been provided and designed into this scheme.
Section 4.19 notes that for central and/or accessible urban locations comprising wholly of apartments in more central locations well served by public transport, the default policy is for car parking provision to be minimised.	In line with this policy, the proposed development includes 100 no. car parking spaces (a ratio of 0.48 no. spaces per unit). The accessibility of this site due to the public transport systems in close proximity enable this scheme to have this parking level.
Appendix 1 out sets out the following minimum overall apartment floor areas: <ul style="list-style-type: none"> • Studio: 37sqm • One bed: 45sqm • Two bed (3 person): 63sqm • Two bed (4 person): 73sqm • Three bed: 90sqm 	The proposed units are fully in compliance with these standards. The one bed units range in size from 47.8sqm to 54.8sqm with aggregate bedroom areas ranging from 11.8sqm to 12.4sqm, and storage spaces 5.4sqm. The two bed units range in size from 75.5sqm to 83.6sqm, with aggregate bedroom areas 24.8sqm to 24.9sqm and storage spaces 7.6sqm. Please see the HQA prepared by BKD Architects for further details.
Appendix 1 provides the following aggregate bedroom floor areas: <ul style="list-style-type: none"> • One bed: 11.4sqm • Two bed (3 person): 20.1sqm • Two bed (4 person): 24.4sqm • Three bed: 31.5sqm 	
Appendix 1 provides the following storage space requirements:	

<ul style="list-style-type: none"> • Studio: 3sqm • One bed: 3sqm • Two bed (3 person): 5sqm • Two bed (4 person): 6sqm • Three bed: 9sqm 	
<p>Appendix 1 provides the following minimum floor areas for private amenity space:</p> <ul style="list-style-type: none"> • Studio: 4sqm • One bed: 5sqm • Two bed (3 person): 6sqm • Two bed (4 person): 7 sqm • Three bed: 9sqm 	<p>As shown on the drawings, each apartment is provided with a balcony/terrace in line with these standards.</p>
<p>Appendix 1 provides the following minimum floor areas for communal amenity space:</p> <ul style="list-style-type: none"> • Studio: 4sqm • One bed: 5sqm • Two bed (3 person): 6sqm • Two bed (4 person): 7 sqm • Three bed: 9sqm 	<p>Based on these communal open space requirements the proposal requires c. 1,248 sqm communal open space. The proposal includes c. 1,619 sqm communal open space which exceeds this requirement.</p>

Evaluation of Consistency

The proposed development is considered an Intermediate Urban Location, as outlined in the table above, and is considered in accordance with the criteria relating to car parking, density, units mix, and dual aspect for such locations.

BKD Architects have prepared a Housing Quality Assessment which demonstrates how the proposal is in accordance with the space requirements in Appendix 1.

Overall, it is considered that the proposed development will provide a high-quality apartment scheme that is in line with the Apartment Guidelines.

Childcare Facilities Guidelines for Planning Authorities (2001)

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Sustainable Urban Housing: Design Standards for New Apartments*, 2020 states the following:

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

Evaluation of Consistency

Applying the 2001 guidelines standard of 20 no. childcare spaces per 75 no. dwellings would indicate that c. 56 private childcare places (208 total units /75 dwellings *20 childcare places) would be needed for the proposed development.

However, given the large number of one and two bed units proposed (100%) it is highly unlikely that the development will generate that level of demand for private childcare.

Furthermore, it is now acknowledged that the 20 spaces per 75 units standard for calculating creche demand is rudimentary and, in many cases, has led to an overprovision of permitted/built/vacant creche facilities in residential developments throughout the country which, for various reasons, are commercial unviable and/or there is insufficient local demand for.

As noted in the Apartment Guidelines, the childcare guidelines are to be revised in the future with a view to ensuring that childcare facilities are sufficient in terms of number, location and size to be commercially viable and to provide for sustainable communities. In the interim, until the new childcare guidelines are produced, the Apartment Guidelines, advise that creche requirement should be carefully considered with regard to the specific residential proposed, local demographics and socio-economic trends, including the number of children who currently attend pre-school in the area and the specific existing provision and capacity.

As a result, this application includes a Childcare Assessment by McGill Planning Limited, identifying the existing facilities in the area, their capacity, and identifying the likely demand arising from the proposed development which can be met by the existing capacity in the local area.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines set out a range of qualitative standards to ensure residential developments create sustainable living environments:

Policy	Evaluation of Consistency
Section 2.1-2 Plan led approach	
The amount and type of new housing required to meet the needs of the wider area	The proposed apartments will provide for an increase in the mix of housing types and unit sizes in the Kimmage area. It will also meet the existing housing need in the area.
Adequate existing public transport capacity available	The subject site is highly accessible and is served by seven bus routes which connect the site with the city centre, UCD, Dundrum, Tallaght and Rathmines.
The relationship and linkages between the area to be (re)developed and established neighbourhoods	The existing access road from Kimmage Road to the adjacent gym will provide access to the proposed development. The proposal includes road improvement works to the existing access road from Kimmage Road West to the subject site and the adjacent gym.

The scale, location and type of public open space	The proposal includes public open space in the south-east corner of the subject site, which is easily accessed from the access road and will be opposite the existing gym.
Appropriate density levels within the area	The proposed density of development is considered appropriate given the highly sustainable location of the site.
Protection and enhancement of biodiversity and the green infrastructure	The proposal will enhance biodiversity the site through appropriate landscaping.
Adaptation to impacts of climate change	The Infrastructure Report and the Site Specific Flood Risk Assessment submitted with the application outline how climate change has been taken into account in the surface water calculations to minimise flood risk.
Avoidance of natural hazards such as flood risk	
Section 2.3 Sequential approach	
The development plan should identify where practicable the sequential and co-ordinated manner in which zoned lands will be developed.	The subject site is zoned for Z1 ‘to protect, provide and improve residential amenities’ in the Development Plan and as such has been identified as suitable for residential development.
The provision of water and sewerage investment programmes by planning authorities must also be related to the sequencing of residential lands	A small section of the site, which currently contains the access road, is zoned Z9. The proposal will not change the existing use of this section of the site.
Chapter 3 The role of design	
Does the proposed development give due consideration to the 12 Best Practice Design Manual Criteria?	The response to 12 criteria is discussed in detail as part of evaluation of consistency with Urban Design Manual.
Have designers of urban housing schemes carried out a site appraisal prior to preparing a layout?	Yes, the layout was derived from a site appraisal conducted for the site which considered alternative options.
Is the standard of design of a sufficiently high standard?	Yes, the proposed development is of a very high design standard. Please see the Architect’s Design Statement prepared by BKD Architects.
Does the design of residential streets strike the right balance between the different functions of the street, including a “sense of place”?	The proposed development is arranged in five apartment blocks. The proposed Blocks 4 and 5 are connected. There are two streets provided within the scheme, the access road that continues between Blocks 3 and 4/5 and the street along the northern boundary which provides access to the parking. The proposed blocks provide a strong frontage to these streets and will help create a sense of place.
Chapter 4 Planning for Sustainable neighbourhoods	
Has an assessment of the capacity of existing schools or the need for new school facilities been carried in connection with proposals for substantial residential developments?	The development consists of 100% 1 bed and 2 bed units. Given this, it is highly unlikely that the proposed development will generate a large cohort of school going population. Nonetheless, we note that there are numerous primary and post-primary schools within 1km of the subject site. Please see the Community and Social Infrastructure Audit submitted with this application for further detail.
Is there an appropriate range of community and support facilities?	A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site.

	Please see the Community and Social Infrastructure Audit submitted with this application for further detail.
Prioritise walking, cycling and public transport, and minimise the need to use cars;	Pedestrian and cyclist access to the site has been prioritised with minimal vehicular access to the site. Please see the Traffic Impact Assessment enclosed with this application.
Ensure accessibility for everyone	The apartment scheme has a lift within each block making all apartments suitable for older people or people with reduced mobility.
Encourage more efficient use of energy and a reduction in greenhouse gas emissions?	The orientation and layout of units provides a density that promotes the efficient use of land. Greenhouse gas emissions will be minimised through the use of efficient heating systems, modern insulation techniques and use of glazing to maximise solar penetration throughout each house.
Include the right quality and quantity of public open space	The proposed development includes a total of c. 1,261 sqm public open spaces which is provided to the east of the site. This is in excess of the 10% required for this site.
Include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?	The layout and design of the scheme will provide a high-quality living environment where safety and convenience are of the utmost importance. The layout offers a high level of amenity and privacy for balconies and within apartments.
Present an attractive and well-maintained appearance?	The public open space has been designed with soft landscaping and planting which will provide an attractive appearance. A landscape maintenance plan is also submitted with the application.
Promote social integration and provide for a diverse range of household types, age groups and mix of housing tenures?	The scheme provides one and two bed apartment units which increase the variety of housing stock in the area and cater for individuals and couples.
Protect, and where possible enhance, the built and natural heritage?	There is no built heritage on site. The natural environment will be improved upon within the proposed landscape strategy.
Provide for Sustainable Drainage Systems?	The design includes provision for SuDs. Please refer drawings and reports by Barrett Mahony Civil and Structural Consulting Engineering enclosed with this application.
Deliver a quality-of-life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;	The scheme has been designed in accordance with all relevant quantitative and qualitative residential standards as set down in the national apartment guidelines and the Development Plan. Future residents will live in a safe residential environment with public and communal open space free of cars and close proximity to social infrastructure, open spaces and public transport in the area.
Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;	The development will consist of one and two bed apartments, communal open space, and public open space, all located within the existing suburban residential area of Kimmage with

	<p>existing neighbourhood centres, employment, facilities and amenities all within a short distance from the subject site.</p> <p>A detailed assessment of the local social infrastructure is included in the Community and Social Infrastructure Audit submitted with the application.</p>
Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;	The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing houses adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company.
Are easy to access for all and to find one's way around;	There is one vehicle access into the site off Kimmage Road West to the south eastern side of the site which also provides cyclist and pedestrian access. The layout is logical, interesting and wayfinding uncomplicated.
Provide a mix of land uses to minimise transport demand;	The site is zoned for residential development as is proposed. Support services in terms of the 36 residential facilities with high quality outdoor spaces are also provided. The scheme is within c. 3-minute walk of a wide range of bus services. It is accessible to a variety of existing facilities and employment opportunities in the area.
Promote social integration and provide accommodation for a diverse range of household types and age groups;	1 and 2 bedroom units are proposed for the scheme. This will improve the overall mix in the wider area which comprises mainly larger 3+ bed houses at present. This mix will cater to the needs of first-time buyers, starter homes for couples, and the elderly.
Enhance and protect the green infrastructure and biodiversity;	The proposal will result in a significant improvement in the landscaping, planting and biodiversity on site.
Enhance and protect the built and natural heritage.	The proposed development does not have any protected structures on the site, nor are there any in the immediate vicinity. Equally the site is not located within or adjacent an Architectural Conservation Area (ACA) or zone of archaeological potential.

Evaluation of Consistency

The proposed development is considered in accordance with the policies and objectives of the Guidelines as they relate to large urban development sites within a city location. The site conforms with the “public transport corridor” density location typology outlined in Chapter 5 which refers to sites within walking distance of high quality public transport, which includes sites within 500 metres walking distance of a bus stop.

The Guidelines state that “minimum” densities within such catchments should start at 50 units per ha with the highest densities being located adjacent the public transport stop. The proposed development is directly adjacent the future Bus Connects F3 spine which will enhance connectivity to Dublin City Centre. Therefore, the subject site is considered suitable for higher density in this regard. The proposed net density in this instance is 166.4 units per ha.

The Guidelines also promote urban design to create places of high quality and distinct identity, to provide connectivity, permeability, safety, legibility and sense of place. In this regard, the Guidelines are accompanied by a Design Manual (discussed below) which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

To ensure sustainable communities the Guidelines stress that community facilities are also to be provided. A creche assessment was prepared and demonstrates that there is sufficient community facilities within the surrounding area.

Self-contained and highly sustainable residential neighbourhood is proposed in accordance with these National Guidelines. The introduction of apartments enhances the area to form a more sustainable community as it adds to the housing mix by providing accommodation which not only serves family settings but also individuals, couples and empty nesters.

Urban Design Manual: A Best Practice Guide (2009)

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
The development seems to have evolved naturally as part of its surroundings.	<p>The proposed development accords with the zoning objectives of the DCC development plan to provide for residential development. This development naturally evolves with its residential surroundings as a result of its close proximity to public transport facilities.</p> <p>The proposed scale and layout of development now proposed seeks to further exploit these natural assets to create a highly attractive residential development that at the same time optimises the return on zoned and serviced land so close to high quality and highly efficient public transport and planned services.</p>

Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.	<p>The proposed density is in accordance with National Planning Policy which encourages site to make the best use of zoned land.</p> <p>The context of the site makes it particularly suitable for higher density residential development given the proximity to the City Centre, frequent bus services, services and employment both within the lands and adjoining at Crumlin, Rathgar and Terenure.</p> <p>The site is unique in its context which has remained greenfield despite the suburbanisation of the wider area. The proposed heights step up to six storeys to respect and integrate with the existing houses to the north, west and east of the site.</p>
Form, architecture and landscaping have been informed by the development's place and time.	<p>The proposal reflects the significant increases in densities and scale achieved along high quality public transport corridors such as Dublin Bus Routes.</p> <p>The proposed development also reflects national policy for consolidated urban development and higher densities and scale on accessible and well serviced urban sites throughout Dublin City as promoted in the NPF and the RSES.</p> <p>The current proposal is a residential development that is modern not just in terms of design and density but also in terms of promoting an attractive living environment with significant and safe open spaces for future residents.</p>
The development positively contributes to the character and identity of the neighbourhood.	<p>The proposal is a striking design and layout which optimise this L shaped infill greenfield site and will enhance and develop the character of this residential area.</p> <p>It will remove an underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.</p>
Appropriate responses are made to the nature of specific boundary conditions.	<p>A proposed green link along the southern boundary will be visually permeable providing views into the site and the public open space. A tree alignment formed by a mixture of existing and proposed trees will enclose the site from the north, east and west site boundaries, to provide a comfortable visual buffer for nearby residents.</p>
2. Connections – How well connected is the new development	
There are attractive routes in and out for pedestrians and cyclists.	<p>The development is connected directly to Kimmage Road West. The landscaping of the site provides for a green route which runs in an east west pattern at the south of the site. This route allows for greater permeability for residents around the site within a car free environment.</p>

The development is located in or close to a mixed-use centre.	The proposed development is surrounded by mixed use centres, the closest being Ashleaf shopping centre c.1km to the west of the site and Terenure village c.1.6km to the east of the site. The site is also connected by sustainable transport modes such as cycling and public transport to Dublin City Centre.
The development's layout makes it easy for a bus to serve the scheme.	The site is less than c. 300m walking distance from bus stops along Kimmage Road West which are serviced by routes 9, 54, 17 and 17D. Further improvements will be made along Kimmage Road West as the Bus Connects updates role out in the near future.
The layout links to existing movement routes and the places people will want to get to.	Dedicated and safe pedestrian/cyclist permeability through and around the site is enshrined in the specific design and layout proposed to ensure people can travel in and out of the site seamlessly
Appropriate density, dependent on location, helps support efficient public transport.	The density accords with national guidelines which promote higher density development closer to high quality public transport and local services. The lower levels of private car parking within this scheme also enables this development to support the efficient use and maximise the sustainable use of public transport. See Barrett Mahony Parking Provision Report/ Residential Travel Plan for further details on efficient and sustainable travel modes.
3. Inclusivity – How easily can people use and access the development?	
New homes meet the aspirations of a range of people and households.	The proposed scheme will overall improve the mix of 1 and 2 bed units on offer in the wider area and will facilitate a wider range of homeowners including individuals, couples, small families and empty nesters.
Design and layout enable easy access by all.	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.	The scheme will provide a variety of open spaces, public and communal spaces for a range of different ages including children, adults and the elderly. All the apartments will also have dedicated private outdoor space in the form of balconies/terraces.
Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.	The public realm will be accessible to all. Public, private and semi-private areas will be defined by soft and hard landscaping treatments.
New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.	The layout presents attractive urban edges to the open spaces proposed that will be supervised and overlooked.
4. Variety – How does the development promote a good mix of activities?	
Activities generated by the development contribute to the quality of life in its locality.	The proposal will provide for a more sustainable housing mix within the area which reflects current demographic trends and will increase population creating additional demand for services.

Uses that attract the most people are in the most accessible places.	The public open space is located in the south east corner of the site which will be clearly visible from the access road to the gym and the subject site. The communal open spaces are provided in podium level courtyards that will be clearly visible and accessible from the apartments.
Neighbouring uses and activities are compatible with each other.	The area is characterised by residential uses; as such the proposed use is compatible with the surrounding area.
Housing types and tenure add to the choice available in the area.	A variety of apartments are provided which will further improve the range of unit types in the area available to various household types. Please refer to the accommodation schedule for more information.
Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.	The scheme has a range of community services and facilities proximate to the site. This eliminates the need for these facilities to be provided within the scheme.
5. Efficiency - How does the development make appropriate use of resources, including land?	
The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.	The proposal achieves the optimum density on site having regard to the standards of national and local policy as well as existing services, transport options, and local centres within proximity.
Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.	The lower parking provision enables more high-quality landscaping to be provided. As a result, significant public open space will be provided within the scheme incorporating SuDS and promoting biodiversity.
Buildings, gardens and public spaces are laid out to exploit the best solar orientation.	The apartment blocks are laid out to ensure all units have access to sufficient light. In addition, 52.9% of the units are dual aspect. Residential units and open spaces will enjoy sufficient sunlight and daylight provision. This is further demonstrated by the Daylight Sunlight Report submitted with the application.
The scheme brings a redundant building or derelict site back into productive use.	This proposed scheme brings an underutilised greenfield site into productive use by establishing a higher residential density on site.
Appropriate recycling facilities are provided.	Communal recycling facilities are provided in the bin stores strategically located proximate to each apartment block.
6. Distinctiveness - How do the proposals create a sense of place?	
The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.	The new public park proposed will provide a high quality open space where the wider community will congregate and recreate.
The scheme is a positive addition to the identity of the locality.	The site is currently a vacant greenfield site. The proposal will provide an appropriate scale and quantum of residential development on a key site directly adjoining efficient public transport.
The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	The topography including the surrounding residential and institutional buildings have all been considered with the design of the proposed development and its response to the surrounding area in scale and height.

	<p>The proposed layout adapts to the site boundaries and existing buildings surrounding the site. The proposed apartment buildings have been strategically designed within the site in order to reduce their impact on the landscape and character of the area whilst placing a focus on enhancing the density of the site. The buildings vary in height between two and six storeys with lower heights in close proximity to existing buildings and increased heights at the centre of the development. The apartment buildings are placed to enclose the public and community open spaces ensuring that these spaces are overlooked by the proposed dwellings.</p> <p>The buildings are laid out to allow optimum light penetration into the spaces whilst the blocks also have views onto open spaces throughout the development.</p>
The proposal successfully exploits views into and out of the site.	<p>The proposal will introduce new views into the site that is currently gated off from public access. The spaces between the blocks create an open and visually permeable development. This maintains view to, though and from the site.</p> <p>The height and design of the buildings will result in an attractive, legible route though the site, making way finding easy.</p>
There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.	The public open space upon entering the site will be the focal point to the overall development. It creates an amicable first impression to visitors upon arrival and opens the space to integrate with lands zoned as recreation and amenity in close proximity.
7. Layout - How does the proposal create people friendly streets and spaces?	
Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.	The location of the public open space is located close to existing pedestrian footpaths into the site from the access route. These will be improved as part of the development. Within the development a new pedestrian route is provided along the southern boundary connecting the blocks in an attractive, car free manner.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	All apartments overlook the public open spaces and streets. The apartment elements such as balconies provide frontages that contributes to passive surveillance of the public open space and communal space within the scheme and pedestrian access paths.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted in the main to the east of the site to ensure a predominantly car free environment.

Traffic speeds are controlled by design and layout rather than by speed humps.	
Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.	The open space strategy provides multiple open spaces of varying uses and sizes.
8. Public Realm - How safe, secure and enjoyable are the public areas?	
All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.	All spaces are well distributed and overlooked and supervised by surrounding apartment blocks.
The public realm is considered as a usable integrated element in the design of the development.	The location of the public open space is considered usable and integrates well with existing development such as the recreational facility adjacent to the site.
Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.	The diverse range of open space provided within the scheme provide opportunities for informal recreation and play which will be overlooked by adjacent blocks.
There is a clear definition between public, semiprivate, and private space.	There is a defining difference between public and private space throughout this proposed development. Public open space is situated along the south eastern side of the site. Communal open spaces are along the western boundary and between blocks. Private balconies are accessed directly from the apartments only. Where there is a terrace at ground floor or adjacent to a communal space, it has a privacy strip within the landscaping ensuring privacy and a clear protection of spaces.
Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	Within this scheme private cars are restricted to the immediate road access on Kimmage Road West of the site which leads to the north of the site. This east west flow of traffic along the northern section of the site allows for car free open/green spaces for pedestrian safety.
9. Adaptability - How will the buildings cope with change?	
Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.	The proposed apartments can be amended internally to adapt to the changing needs of the residents.
The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.	
The homes are energy-efficient and equipped for challenges anticipates from a changing climate.	The new apartments will be constructed in accordance with the energy efficiency standards in place
Homes can be extended without ruining the character of the types, layout and outdoor space.	The proposal is for apartments and therefore these two policies don't apply to the proposed development.
Space in the roof or garage can be easily converted into living accommodation.	There is no roof space or garage space associated with the apartments.
10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?	
Each home has access to an area of useable private outdoor space.	Yes, each unit is provided with private balcony/ terrace to standard as per the national apartment guidelines.
The design maximises the number of homes enjoying dual aspect.	The majority have dual aspect which accords with national policy.

Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.	All units have been designed to prevent sound transmission in accordance with current building standards.
Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.	Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue of the development particularly in relation to adjoining development. Landscaping strips and boundary treatments at ground floor level ensure that ground floor areas will have an adequate level of privacy.
The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables	All apartments are designed in accordance with national design standards on storage areas.
11. Parking – How will the parking be secure and attractive?	
Appropriate car parking is on-street or within easy reach of the home's front door.	The parking is secure and readily accessible for all residents who choose to use this facility. This is a highly accessible location so the demand for car spaces is reduced in locations such as these. This is in line with current NPF policy. Please see the Traffic and Transport Assessment for further details.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.	All of the parking is either visible from the apartments or is within a secure underground car park.
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	The majority of the car parking is in a communal undercroft car park. There are further car parking spaces provided at surface level which can be used by visitors.
Materials used for parking areas are of similar quality to the rest of the development.	Parking areas will comprise quality surface treatments that promote sustainable drainage and are in keeping with palette and quality of building materials used elsewhere in the area.
Adequate secure facilities are provided for bicycle storage.	Dedicated bicycle parking is provided throughout the scheme in line with the Design Standards for New Apartments and cycle standards.
12. Detailed Design – How well thought through is the building and landscape design?	
The materials and external design make a positive contribution to the locality.	The overall choice of materials and elevations reflect the development in the surrounding area and will be an attractive feature in the landscape.
The landscape design facilitates the use of the public spaces from the outset.	The open spaces will be phased in tandem with the delivery of residential development.
Design of the buildings and public space will facilitate easy and regular maintenance.	The layout of the blocks and the landscaped areas will be accessible for easy and regular maintenance which will be provided by the estate management company.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	Parking is predominantly along the northern section of the site, at undercroft level, and is limited in favour of providing high quality landscaped open space to the western and southwestern areas of the site.
Care has been taken over the siting of flues, vents and bin stores	Bin stores and bike stores are located discretely around the site. No other flues or vents are proposed.

The ESB substations have been designed into the apartment blocks to minimise intrusion on the open space and public realm.

Evaluation of Consistency

Based on the above, it is considered that the proposed development is in accordance with the Urban Design Manual. We predict the development will create a high-quality residential environment in Kimmage.

The Planning System and Flood Risk Management (2009)

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

Evaluation of Consistency

Full details of this assessment are in the Site Specific Flood Risk Assessment prepared by Barrett Mahony Engineers and submitted with this application.

This report identifies that the development falls in Flood Zone C, therefore a Justification test or a Stage 3 Detailed Flood Risk Assessment is not required. It notes that while some parts of the boundary lie within Flood Zone A and Flood Zone B, no proposed buildings are proposed in these areas and as such the development falls within Flood Zone C.

The conclusion of the report finds that:

"Based on available and recorded information, the site has not been subject to flooding in recent history.

The risk of tidal flooding is considered very low as the subject site lies outside the 0.1% AEP.

The risk of fluvial flooding in the area is considered low as the proposed site lies outside the 1% AEP.

The risk of flooding due to ground water ingress to the proposed development is considered low. The risk of pluvial flooding is considered low, due to the site location and proposed measures for development.

Based on the flood risk identification in Stage 1, the proposed development falls in Flood Zone C. Therefore, the proposed development is deemed 'Appropriate' in accordance with guidelines of the OPW's publication."

Design Manual for Urban Roads and Streets (2019)

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

In order to achieve a balanced approach to development, the following four core principles of good design for urban roads and streets have been adhered to in the design proposal:

Design Manual for Urban Roads and Streets	
Design Principle 1	Connected Networks
“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”	The proposed layout and design ensure a permeable and legible development for all users. There are pedestrian pathways through the public realm which provide clear, accessible routes through the site.
Design Principle 2	Multi-Functional Streets
“The promotion of multi-functional, place based streets that balance the needs of all users within a self-regulating environment.”	The layout ensures that all open spaces and routes are overlooked providing a strong sense of safety and creating a self-regulating environment.
Design Principle 3	Pedestrian Priority
“The quality of the street is measured by the quality of the pedestrian environment.”	Pedestrian priority is of the utmost importance. The passive surveillance provided by the overlooking apartments creates a strong sense of safety for pedestrians. Vehicular speeds through the development will be reduced to create a safe environment for pedestrians.
Design Principle 4	Multi-Disciplinary Approach
“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”	The proposed design results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers, landscape architects, and planners.

Evaluation of Consistency

A DMURS Statement prepared by the engineers is included with the planning application. The proposed development achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. Permeability for pedestrians and cyclists is prioritised throughout the scheme with pathways through the public open spaces.

Statement of Consistency with Dublin City Development Plan 2016-2022

The site is located within the administrative area of Dublin City Council and is therefore subject to the land use policies and objectives of the City Development Plan. The 2016-2022 is currently being replaced by the Development Plan 2022-2028. This has now been adopted and will come into force on the 14th December 2022. However, the full completed Development Plan as adopted is not yet published and may yet be challenged. As a result we have assessed the application against both Development Plans.

Zoning

The majority of the site is zoned Z1 'to protect, provide and improve residential amenities'. A small portion of the site is zoned Z9 'to preserve, provide and improve residential amenity and open space and green networks'.

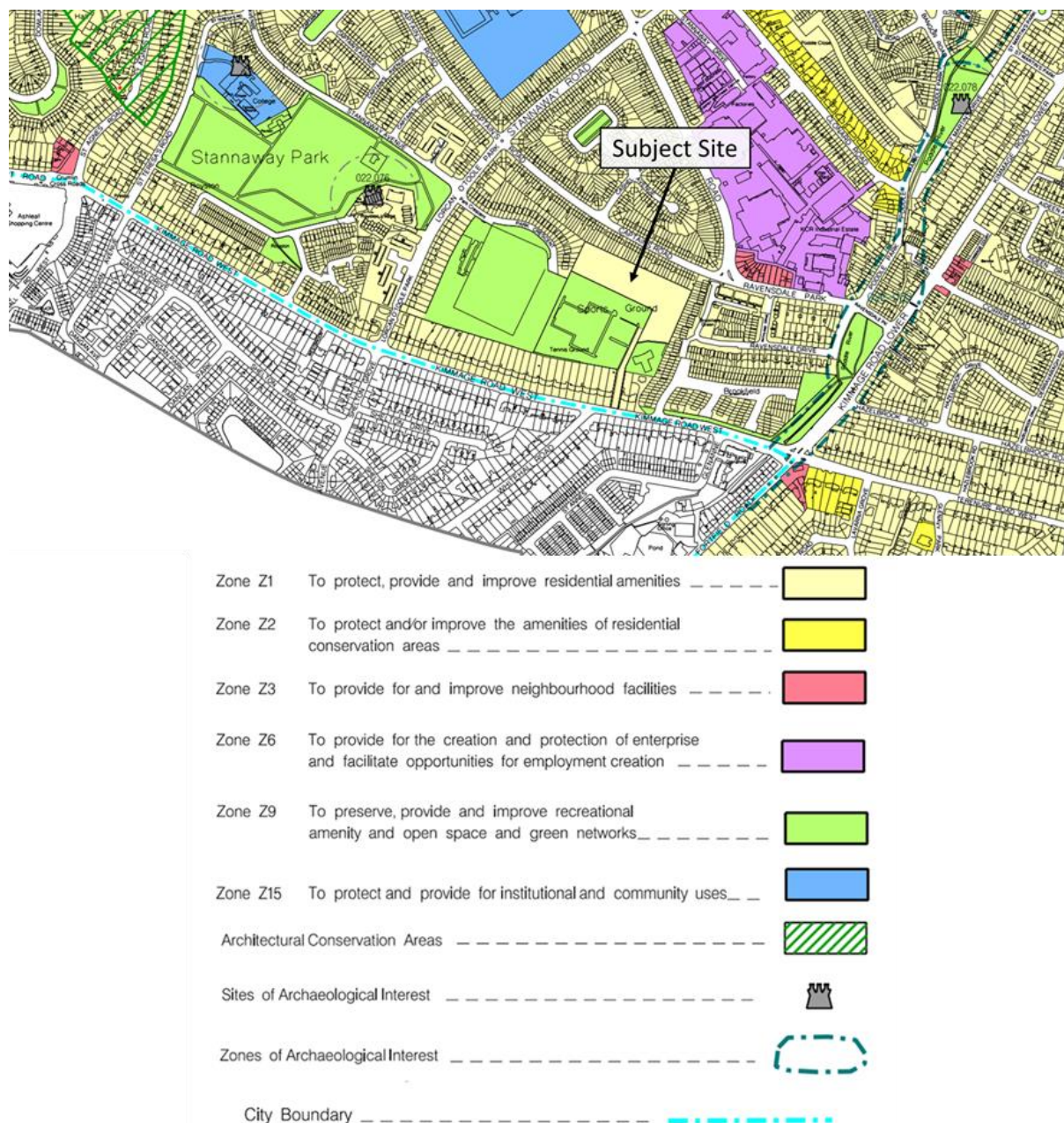


Figure 12 Location of Site on Dublin City Development Plan 2016-2022 Zoning Map G

Z1 Permissible Uses

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

Z1 Open For Consideration Uses

Bed and breakfast, betting office, car park, civic and amenity/recycling centre, garden centre, golf course and clubhouse, hostel, hotel, industry (light), live/ work units, media-associated uses, petrol station, pigeon lofts, public house, restaurant, veterinary surgery.

Table 10 Permissible and Open for Consideration Uses on Z1 Zoning

The small portion of the site zoned Z9 currently contains an existing access road which connects the subject site and the adjacent gym to Kimmage Road West, as identified in the figure below. The proposed development will not alter the existing use on this portion of the site which is as a roadway that currently serves an existing car park and will now also serve an adjoining proposed residential development. It is also noted that “public service installation” is listed as permissible in principle under Z9. Appendix 21 (Land Use Definitions)(page 240) of the Development Plan defining same as “a roadway or land used for the provision of public services.” The intended use of this portion of the site is indeed as a roadway and for the provision of public services (as per civils engineering drawings submitted). Therefore, the Z9 zoning is fully accorded with.



Figure 13 Approximate area of site zoned Z9

Evaluation of Consistency

The proposed development will provide a residential development on this land zoned Z1 for residential development.

The section of the site zoned Z9 will remain as part of the access road to the Ben Dunne Gym and the proposed development site. Therefore, the use of this section will not be materially altered by the proposed development.

The following tables review Development Plan policies on urban design, residential, open space and landscaping and physical and social infrastructure as relevant to the proposed development.

Chapter 3 – Addressing Climate Change

Policy	Evaluation of Consistency
CC3: To promote energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments.	The Energy Analysis Report prepared by IN2 confirms that the proposed development passes all criteria to comply with NZEB.
CC4: To encourage building layout and design which maximises daylight, natural ventilation, active transport and public transport use.	The proposed development includes c. 52.9% dual aspect apartments, reduced car parking standards, and is in close proximity to numerous bus routes.
CCO14: To support the government's target of having 40% of electricity consumption generated from renewable energy sources by the year 2020.	The proposed development includes solar PV panels which will increase the proposed development's energy consumption from renewable sources.
CCO15: To facilitate the provision of electricity charging infrastructure for electric vehicles.	The proposed development includes 12% EV charging points as required by the Development Plan.

Chapter 4 – Shape and Structure of the City

POLICY	EVALUATION OF CONSISTENCY
SC10: To develop and support the hierarchy of the suburban centres, ranging from the top tier Key District Centres, to District Centres/Urban Villages and Neighbourhood Centres, in order to support the sustainable consolidation of the city and provide for the essential economic and community support for local neighbourhoods, including post offices and banks, where feasible, and to promote and enhance the distinctive character and sense of place of these areas.	The proposed development is located within the established residential area of Kimmage, within close proximity to several neighbourhood centres. The proposal will consolidate and increase the density of the area which will support the existing services in the area.
SC12: To ensure that development within or affecting Dublin's villages protects their character	The subject site is a greenfield site with no previous planning history, located off Kimmage Road West. The proposed development will not be affecting the character of Dublin's villages rather enhancing the character of the area with this proposed development.
SC13: To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of	The proposed development is a high density development within this suburban area. This is in accordance with this policy given its location close to good public transport, and within walking distance of a

community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities	<p>wide range of employment, schools and amenities areas.</p> <p>The density proposed, due to the site layout, design of the buildings and the low levels of car parking ensure that the development protects the existing surrounding residents, households and communities.</p>
SC14: To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.	<p>The surrounding area is predominantly two storey terraced and semi-detached low density housing. This proposal will introduce a new form of development, an apartment development which provides one and two bed apartments, providing variety and choice to the existing provision.</p> <p>The layout of the site, the design of the buildings and the landscaping of the space will provide an attractive coherent space, enhancing the tow path walk and providing further permeability to the area.</p>
SC15: To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public spaces.	The provision of a new public open space will further enhance and promote the existing green infrastructure in the area.
SC19: To promote the development of a network of active, attractive and safe streets and public spaces which are memorable, and include, where appropriate, seating, and which encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.	<p>The proposed development is a pedestrian dominated development, and as such, most surface are either shared spaces or are pedestrian only areas. This development will provide visual interest and activity within this attractive area of Dublin through the incorporation of public open space and increased residential density.</p>
SC20: To promote the development of high quality streets and public spaces which are accessible and inclusive, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities.	
SC25: To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city's built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which	<p>This proposed development will develop a greenfield pocket site within a built-up area. The site has been void of development. The proposed development will contribute to the area by introducing an attractive new modern development which is of high-quality architectural design. It will provide a new public open space which is defined and easily located by the key landmark development of the 5/6 storey building.</p>

includes the creation of new landmarks and public spaces where appropriate.	This is a highly sustainable design which will be a positive contribution to the urban architecture of the city.
SC29: To discourage dereliction and to promote the appropriate sustainable re-development of vacant and brownfield lands, and to prioritise the re-development of sites identified in Dublin Inner City Vacant Land Study 2015	

Chapter 5 – Quality Housing

POLICY	EVALUATION OF CONSISTENCY
QH1: To have regard to the DECLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007); ‘Delivering Homes Sustaining Communities – Statement on Housing Policy’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2015) and ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009)	<p>Compliance with <i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007)</i> is demonstrated under the heading ‘Statement of Consistency with National and Regional Policy’.</p> <p>Compliance with the Apartment Guidelines standards and the Urban Design Manual is demonstrated under the heading ‘Statement of Consistency with Relevant Section 28 Guidelines’.</p> <p>We refer to the Schedule of Accommodation prepared by BKD Architects for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.</p>
QH3: (i) To secure the implementation of the Dublin City Council Housing Strategy` in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city	The applicant has engaged with the Housing Department at Dublin City Council with regard to Part V. The proposed Part V submission is enclosed with the application and is in accordance with this policy and national guidance.
QH5: To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.	The proposed development will provide new apartments at this suburban infill site in the established area of Kimmage, in close proximity to existing services and public transport options.
QH6: Attractive mixed use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities and which are socially mixed in order to achieve a socially inclusive city	This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.

QH7: To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.	We refer to the Schedule of Accommodation which shows the density of the scheme is 166.4 units per hectare. This density is considered a sustainable urban density for this site.
QH8: To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area	This development will develop a pocket of greenfield land within the Kimmage area which has no previous planning history. The proposed development will provide a high density development which is cognisant of the character of the surrounding area.
QH9: To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	It is envisaged that the subject application will be carried out in a single phase.
QH10: To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.	The site will open up pedestrian routes from the southern boundary of the site onto Kimmage Road West thus creating a well-connected and permeable neighbourhood.
QH12: To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set out in the Development Plan.	The scheme design employs the most up-to-date design and construction techniques that will improve energy performance throughout the scheme.
QH13: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in The Residential Quality Standards and with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).	<p>All units are sized to allow some minor internal reconfiguration and adaptation.</p> <p>The Residential Quality Standards are addressed in the table below on Chapter 16 of the Development Plan.</p> <p>Section 5.2 of the Department of Environment, Heritage and Local Government '<i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities</i>' (2007) is addressed in the "Statement of Consistency with National and Regional Planning Policy"</p>
QH14: To support the concept of independent living and assisted living for older people, to support the provision of specific purpose-built accommodation, and to promote the opportunity for older people to avail of the option of	The apartment scheme has a lift within each block making all apartments suitable for older people or people with reduced mobility. The proposed development complies with Part M.

<p>'downsizing'. To support the promotion of policies that will:</p> <ul style="list-style-type: none"> • Encourage/promote full usage of dwellings units • Incentivise property owners of underutilised dwellings to relocate to smaller age friendly dwellings. • Actively promote surrendering larger accommodation/financial contribution schemes without compulsion 	<p>The housing mix of one and two bed units provide an opportunity for older people to downsize within the area which would in turn allow larger units in the area to be used by families with young children.</p>
<p>QH15: To require compliance with the City Council's policy on the taking-in-charge of residential developments.</p>	<p>The proposed development does not include any lands to be taken in charge.</p>
<p>QH16: To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas and facilities in the context of the Multi-Unit Developments Act 2011, the Property Services (Regulation) Act 2011 and the establishment of the Property Services Regulatory Authority.</p>	<p>All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up-keep.</p>
<p>QH18: To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.</p>	<p>All apartments front the public open spaces and communal space and road. All apartments will have private amenity space in the form of balconies/terraces which will provide for safe and secure private amenity space.</p> <p>The scheme also includes communal open space for the residents and public open space for the wider area.</p> <p>The social infrastructure in the area is assessed in detail in the Community and Social Infrastructure Audit submitted with this application.</p>
<p>QH19: To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable mixed-income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.</p>	<p>The unit mix is conducive to the creation of a well-balanced residential community given the over-dominance of large family houses in the wider area.</p>
<p>QH21: To ensure that new houses provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation.</p>	<p>The proposal does not include any houses. Nonetheless, the proposal will ensure a high quality of living for residents with generous internal living spaces, storage areas, and private open spaces.</p>
<p>QH22: To ensure that new housing development close to existing houses has regard to the character and scale of the existing houses unless there are strong design reasons for doing otherwise.</p>	<p>The scale and form of the apartment blocks combined with the proposed materials and palette of colours visually harmonise and integrate the entire residential scheme.</p>

Chapter 8 Movement and Transport

Policy	Evaluation of Consistency
<p>MT2: Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.</p>	<p>The proposed development includes a reduced car parking ratio and limits the vehicular access to the site. This will help to discourage the reliance on private car ownership and promote a modal shift towards more sustainable forms of transport.</p> <p>The reduced car parking provision is appropriate for this site due to the high levels of public transport in the area, its proximity to a wide range of amenities, employment and retail facilities, and the nature of the development.</p> <p>This reduced parking ratio is considered to be entirely in accordance with these objectives from the Development Plan.</p>
<p>MT18: To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.</p>	
<p>MT13: To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.</p>	
<p>MT17: To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking</p>	
<p>MT 18: To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.</p>	<p>The proposed development, which is located in an established suburban area, includes a reduced car parking ratio and extra cycling parking (including cargo bike spaces) which will encourage a modal shift away from car dependency and reduce the need for car parking.</p>
<p>MTO23: To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.</p>	<p>A Parking Report & Residential Travel Plan has been prepared by Barrett Mahony Consulting Engineers and is submitted as part of this application.</p>
<p>MTO45: To implement best practice in road design as contained in statutory guidance and in the DMURS</p>	<p>The access road to the site has been designed in line with the guidance in DMURS.</p>

(the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.	A DMURS Compliance statement has been completed by Barrett Mahony Consulting Engineers confirming that the design and layout of the site is in line with this guidelines and are suited for all users.
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Chapter 10 – Green Infrastructure, Open Space and Recreation

POLICY	EVALUATION OF CONSISTENCY
GI3: To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.	The proposed development includes a public open space to the south-east of the site which will be accessed from the access road to the site. The proposal includes a pedestrian route along the southern boundary of the site which will provide a safe route for pedestrians through the site.
GI5: To promote permeability through our green infrastructure for pedestrians and cyclists	All public and communal spaces will be landscaped and planted with trees/shrubs to improve tree cover and enhance biodiversity on site.
GIO2: To apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects.	
GI30: To encourage and promote tree planting in the planning and development of urban spaces, streets, roads and infrastructure projects.	

Chapter 12 – Sustainable Communities and Neighbourhoods

POLICY	EVALUATION OF CONSISTENCY
SN4 To have regard to the Department of Housing, Planning, Community and Local Government's Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG's Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA's Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie)	Compliance with the Department of Housing, Planning, Community and Local Government's <i>Guidelines on Sustainable Residential Development in Urban Areas</i> and its accompanying <i>Urban Design Manual, 2010</i> , and the <i>Design Manual for Urban Streets and Roads (DMURS), 2013</i> is demonstrated under the heading 'Statement of Consistency with Relevant Section 28 Guidelines'.
SN5 To ensure that applications for significant large new developments (over 50 units) are	A Community and Social Infrastructure Audit has been completed and submitted as part of this application.

accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.	
SN15 To ensure the optimum use of community facilities and that high-quality facilities are accessible to all.	The proposal includes a public open space that will serve the wider community. It has been designed with high-quality materials and facilities and will be accessible to all.
SN17 To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area	The proposed development is not expected to generate significant demand for extra childcare spaces, and any extra demand can be catered for in the existing childcare facilities in the area. Therefore, a childcare facility is not proposed as part of this development.
SN20 To promote the development of both indoor and outdoor facilities/spaces for young people e.g. multi-use games areas (MUGAs), teenage shelters, skateboarding areas and skateboard parks, youth cafés, youth centres, and kids clubs.	The proposed development includes a public open space and is located in close proximity to numerous existing open spaces and sports facilities. These are outlined in detail in the Community and Social Infrastructure Audit.
SN30 To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, i.e. children, people of working age, the elderly, people with disabilities.	The proposed development will provide one and two bed units which will cater for smaller households. In addition, the units are designed to be fully accessible.

Chapter 16 – Development Standards

POLICY	EVALUATION OF CONSISTENCY
16.2.2.1 Large-Scale Development	
To create new compositions and points of interest	The proposed development will provide a new residential development on this greenfield, infill site in the established area of Kimmage. The proposed apartment blocks will provide a new point of interest at the end of the existing access road from Kimmage Road West. The proposal also provides a public open space that will serve both the proposed development and the wider area.
To provide high-quality new streets, squares and open spaces, where appropriate, linked to the surrounding street pattern, to maximise accessibility	
To retain existing and create new features to make an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes	
To provide an appropriate mix of uses comprising retail, residential, entertainment, recreational, cultural, community- and/or employment generating uses; particular emphasis should be given to new and complementary uses and facilities that expand and improve the existing range of uses and facilities in the area	The subject site is located in a predominately residential area with employment uses to the north and neighbourhood centres to the north, east and west. The proposed residential development will complement the existing uses in the area. The public open space will serve both the proposed development and surrounding area.

To carefully integrate appropriate planting and trees	The proposed development includes a detailed landscaping plan prepared by Dermot Foley Landscape Architects.
To take into account existing and likely future patterns of traffic and pedestrian movement, including pedestrian desire lines	Barrett Mahony Consulting Engineers have prepared by Traffic Impact Assessment for the proposed development.
To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks	The proposed development will connect the existing services infrastructure in the area. Please see the Infrastructure Report prepared by Barrett Mahony Consulting Engineers for further details.
Ensure waste storage facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	The proposed bin stores have been carefully located to minimise their visual impact. Please see the Operational Waste & Recycling Management Plan for further detail.
16.2.2.2 Infill Development	
Dublin City Council will seek to ensure that infill development respects and complements the prevailing scale, architectural quality and the degree of uniformity in the surrounding townscape	The proposed development has been designed to integrate into, and respect, the surrounding area. The proposed building heights step up to six storeys with the lower floors adjacent to the existing houses to the north and east. Blocks 1-4 are stepped back in height from the northern boundary to minimise the impact on the adjoining residential properties to the north. Block 5 has been moved west from the eastern boundary and carefully designed to minimise the potential impact on the adjoining residential properties to the east.
16.3.3 Trees	
Dublin City Council will consider the protection of existing trees when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges	There are 27 mature Lawson's Cypress trees to the northeast and 11 mature Lawson's to the north west of the boundary. The areas between and to the east compose hedging and shrubs. It is proposed to retain all 38 boundary trees while removing the hedging. Post construction the boundaries will be planted up with supplementary trees and hedging.
A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development	<p>An Arboricultural Assessment, Impact Statement and Method Statement has been completed and submitted with this application. It has found that the impact <i>"of the proposed development on the existing tree population should be minimal with any losses easily mitigated by appropriate planting."</i></p> <p>It goes on to state that <i>"all efforts have been made to retain the trees around the perimeter of this site to help blend this development into its surrounding environment, therefore, the visual impact of the proposed development on the trees will be minimum. Where hedging and scrub is to be removed to</i></p>

	<i>facilitate construction i.e. Bike racks and bin bays, it will be mitigated by follow up planting."</i>
16.5 Plot Ratio	
The indicative plot ratio for Z1 lands is 0.5-2.0	The proposed plot ratio of 1.63 is within the range for Z1 lands.
16.6 Site Coverage	
The indicative site coverage for Z1 lands is 45%-60%.	The proposed site coverage of 43.1% is just slightly below the indicative limit for Z1 lands.
16.7 Building Height	
Figure 39 identifies the maximum height of the 'low rise rest of city' as 28m. The subject site is located outside the 'inner city' as identified in Map K. The table provided on page 320 of the Development Plan notes that outer city has a maximum height of up to 16m.	The proposed development includes heights up to 6 storeys which was deemed acceptable by both DCC and ABP in assessing the SHD granted on the site.
16.9 Roads and Services	
Roads and services must adhere to DMURS and be designed to taking-in charge standards.	The proposed streets have been designed in line with DMURS. Please see the DMURS Statement prepared by Barrett Mahony Consulting Engineers.
All services must be provided underground in the interests of amenity except where it is clearly shown by a statutory undertaker that underground location is of an impractical nature	All services are provided underground. Please see the Infrastructure Report and drawings prepared by Barrett Mahony Consulting Engineers.
16.10.1 Residential Quality Standards – Apartments	
Minimum overall apartment floor area* <ul style="list-style-type: none"> • Studio-type 40 sq.m • 1-bed 45 sq.m • 2-bed 73 sq.m • 3-bed 90 sq.m <p>* All apartment floor area measurements are taken from internal wall-to-wall dimensions.</p> <p>It is a requirement that the majority of all apartments in a proposed scheme of 100 units or more must exceed the minimum floor area standard by at least 10%</p>	All apartment units comply with the relevant Residential Quality Standards. Please see the Housing Quality Assessment prepared by BKD for further details.
Each apartment development shall contain: <ul style="list-style-type: none"> • A maximum of 25-30% one-bedroom units • A minimum of 15% three- or more bedroom units 	The proposed unit mix of 50% one beds and 50% two beds is in line with the 2020 Apartment Guidelines.
Natural Lighting Living rooms and bedrooms shall not be lit solely by roof lights and all habitable rooms must be naturally ventilated and lit. Glazing to all habitable rooms should not be less than 20% of the floor area of the room.	Living rooms and bedrooms are not lit solely by roof lights and all habitable rooms are naturally ventilated and lit. 52.9% of all apartments are dual aspect. Windows are generously sized to illuminate internal living spaces.

Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011).	The glazing to the proposed rooms complies with this requirement for glazing not less than 20% of the floor area of the room.
Dual Aspect The minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 50%	The proposal provides 52.9% dual aspect units which exceeds this requirement and the requirement in the Apartment Guidelines.
Block Configuration There shall be a maximum of 8 units per core per floor, subject to compliance with the dual aspect ratios specified above, and with building regulations. Deck access may be acceptable as long as bedrooms do not face out on to the deck and it is well proportioned and designed	The proposal includes a maximum of 10 units per core per floor which is line with the 2020 Apartment Guidelines and the limit of 12 no. units per core.
Minimum widths for main living/dining rooms: Studio: 5m, 1 bed unit: 3.3m; 2 bed unit: 3.6m; 3 bed unit: 3.8m	The HQA prepared by BKD Architects and submitted with the application provides the sqm of all proposed bedrooms, living/kitchen/dining rooms, storage rooms, and private open space. The proposed development complies with all the standards outlined here. It is worth noting that these standards match those set out in the Apartment Guidelines.
Minimum kitchen/ living/dining floor area: Studio: 30sqm; 1 bed unit: 23sqm; 2 bed unit: 30sqm; 3 bed unit: 34 sqm.	
Minimum bedroom widths: 73 Studio: 5m; single bedroom: 2.1m; double bedroom: 2.8m; twin bedroom: 2.8m	
Minimum bedroom floor area: Studio: 30sqm; single bedroom: 7.1sqm; double bedroom: 11.4sqm; twin bedroom: 13sqm.	
Minimum aggregate bedroom floor areas: Studio: 11.4sqm; two bedrooms: 24.4sqm; three bedroom: 31.5sqm	
Storage All apartments shall be provided with designated internal storage space separate to the area for kitchen presses, bedroom furniture or areas containing the cold and hot water tanks, and should be designed for ease of access and use.	All proposed apartment units have been designed with internal storage spaces and for ease of access and use.
Minimum Storage Requirements: Studio unit: 3 sq.m.	The proposed one bed units have storage spaces ranging in size from 3.3sqm to 3.7sqm.

1-bedroom unit: 3 sq.m 2-bedroom unit: 6 sq.m 3-bedroom unit: 9 sq.m	The proposed two bed units have storage spaces ranging in size from 6.1sqm to 6.8sqm.
Private Open Space Private open space shall be provided in the form of gardens or patios/ terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security. Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and allow all occupants to sit outside, including wheelchair users. They should also minimise overshadowing and overlooking. The primary balcony should be located adjacent to the main living areas to extend the apartments' living space. The minimum depth of private amenity open space (balcony or patio) shall be 1.5 m	All apartments are provided with private open space, to standard, as balconies or terraces. The terraces at ground floor level have been carefully designed to ensure appropriate privacy and security. The balconies/terraces are all accessible off the kitchen/living/dining areas. The minimum depth of the private open spaces is 1.6m
Minimum area for Private Open Space: Studio unit: 4 sq. m. 1-bedroom unit: 5 sq.m, 2-bedroom unit: 7 sq.m, 3-bedroom unit: 9 sq.m.	The balconies for the proposed one bed units are c. 5.4sqm and the balconies for the proposed two beds are c. 7.6sqm. This exceeds the minimum standards.
Communal Open Space Development proposals shall demonstrate that the communal open space <ul style="list-style-type: none"> • complies with the minimum standards set out below • will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics • is secure for residents and benefits from passive surveillance • considers the needs of children in particular in terms of safety and supervision. In schemes of 25 or more units small play spaces of 85-100 sq.m are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should be provided. 	The proposed development provides c. 1,619sqm of communal open space in four separate spaces (to the western and eastern end of the building and in two podium level spaces between the blocks). The locations of these spaces will ensure the spaces are safe and secure for the residents with passive surveillance provided by the apartment blocks. The areas have been carefully landscaped, as shown in the submitted landscaping plan, with soft and hard landscaping. Due to the unit mix proposed, it is not expected that the proposed development will generate a significant number of children. Nonetheless, the proposed public and communal open spaces will provide seating and grassy areas and play equipment is provided in the public open space.

<ul style="list-style-type: none"> • is wheelchair accessible • achieves good sunlight penetration • has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections. 	
Minimum area for communal amenity space: Studio: 4 sq. m, One bedroom: 5 sq. m, Two bedroom: 7 sq. m, Three bedroom: 9 sq. m	Based on these communal open space requirements the proposal requires c. 1,248 sqm communal open space. The proposal includes c. 1,619 sqm communal open space which exceeds this requirement.
Communal Facilities Communal facilities <u>may</u> be provided in apartment schemes, particularly in larger developments such as community or meeting rooms, laundry rooms etc. which are accessible to residents only	The proposed apartment units include space for laundry facilities within each apartment unit. Therefore, no communal laundry facilities are provided. We refer to the Architects Design Statement which includes the layout and facilities within the blocks
Cycle Parking: All new apartment developments shall provide provision for cyclists in keeping with the requirements set out in Table 16.2 of Section 16.39 Cycle Parking. Table 16.2 sets out the minimum bicycle parking standards for all development in the city. The development plan requires the provision of one cycle parking space per residential unit.	The proposed development includes 2.3 cycle parking spaces per residential unit. This exceeds the Development Plan minimum standards.
16.10.2 Residential Quality Standards – Houses	
At the rear of dwellings, there should be adequate separation between opposing first floor windows. Traditionally, a separation of about 22 m was sought between the rear of 2-storey dwellings but this may be relaxed if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent occupiers.	The proposed apartment blocks are over c.24m away from the existing adjoining neighbouring houses. this is compliant with these standards.
16.10.3 Residential Quality Standards – Apartments and Houses Public Open Space	
<u>Public Open Space</u> In new residential developments, 10% of the site area shall be reserved as public open space. All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of dwellings.	The proposed development includes c.10.1% of the subject site as open space and in line with the requirement for 10% open space on Z1 lands. Section 16.34 states that <i>"In the event that the site is considered by the planning authority to be too small or inappropriate (because of site shape or general layout) to fulfil useful purpose in this regard, then a financial contribution towards provision of a new park in the area, improvements to an existing park and/or</i>

<p>Existing features, such as mature trees, shall be retained and enhanced by the open space provided. A landscaping plan will be required for all developments, identifying all public, communal (semi-private) and private open space. The design and quality of public open space is particularly important in higher density areas. Consideration should be given to the provision of community gardens and/or allotments in new developments. Where feasible, proposed development adjoining a river or canal bank should provide a linear walkway along the bank which is accessible to the general public and connects to any existing contiguous walkway along the bank.</p>	<p><i>enhancement of amenities shall be required (having regard to the City's Parks Strategy).</i></p> <p>The subject site is a greenfield site and there is minimal existing vegetation on site. The proposal includes a public open space and new tree and shrub planting.</p> <p>A landscaping plan is included with the application which identifies all public, communal (semi-private) and private open space.</p> <p>All public and communal open spaces are overlooked by the proposed apartment blocks ensuring passive surveillance and informal supervision.</p>
<p><u>Acoustic Privacy</u> Development should have regard to the guidance on sound insulation and noise reduction for buildings contained in BS 8233:2014. The following principles are recommended for minimising disruption from noise in dwellings:</p> <ul style="list-style-type: none"> • Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and from neighbouring buildings and noise sources • Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas • Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room. 	<p>The proposed development will be fully compliant with any British Standard (BS) and will be addressed at the detailed design and tender stage.</p> <p>The proposed buildings have been set back from the site boundaries which will help maximise acoustic privacy for both the proposed and existing dwellings.</p> <p>The proposed development consists of apartment units on each floor which area all expected to have similar noise levels.</p> <p>The layout of the apartment blocks has been carefully designed to minimise noise impacts on the apartment units. However, the stair lifts are located adjacent to bedrooms in the adjoining units.</p>
<p>16.10.4 Making Sustainable Neighbourhoods</p>	
<p>15 Units or 1,500 sqm All proposals for new development over 15 units or 1,500 sq. m must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to place-making and the identity of an area</p>	<p>We refer to the design rationale prepared by BKD Architects for more information as to how the proposal constitutes a positive urban design response to the local context and how it contributes to place-making and the identity of an area.</p>
<p><u>100 units or 10,000sqm</u> Proposals for new development greater than 100 dwellings or 10,000 sq.m and for public transport infrastructure, in addition to making a contribution to social infrastructure, shall include</p>	

an Urban Design Statement that addresses the following issues:

- How any proposed access points, routes or new streets are interconnected logically with the existing local network of streets, to aid legibility, permeability and walkability and complement local 'desire lines'
- How the development will contribute positively to the quality of the streets and public spaces surrounding it; this should include graphic material showing how the development will contribute to the character of the street and its activity and to the quality of the pedestrian environment
- How the development will contribute to a coherent enclosure for the street or public space including consideration of the proportions and activities of the buildings on both sides of a street or surrounding a public space
- How the proposals impact on, or are affected by, other planned development in the local area. Where a number of developments are proposed in proximity to each other, they may have the potential to cumulatively exert significant change on a neighbourhood. Where this is the case, any potential conflicts or opportunities for synergies or economies should be examined
- How the layout and design of buildings, public realm or infrastructure respond to the series of non-prescriptive questions as set out in the DEHLG's Urban Design Manual, to be considered during the key stages of the design and planning process; proposals should also demonstrate how they address the principles as set out in the Neighbourhood Section of the Urban Design Manual
- How communal amenity spaces within residential developments are designed to be clearly distinct from fully public spaces and their scale and activities appropriate so as to fit within the local network of planned or existing public spaces.

<p>50 units or 5,000sqm</p> <p>When submitting plans for large-scale residential, typically over 50 units depending on local circumstances, and/or mixed-use schemes (i.e., circa 5,000 sq.m and above), developers will be required to submit an audit of existing facilities within the area and to demonstrate how the proposal will contribute to the range of supporting community infrastructure.</p> <p>Proposals in excess of 50 dwelling units must be accompanied by an assessment of the capacity of local schools to accommodate the proposed development in accordance with the above guidelines and the DES and DEHLG's Code of Practice on the Provision of Schools and the Planning System 2008.</p> <p>Dublin City Council may also require developers to submit a phasing and implementation programme for large residential schemes in excess of 50 units, to ensure an agreed co-ordinated approach is taken to the timely delivery of key physical and social infrastructure elements that are essential for sustainable neighbourhoods. Proposals of this scale must also be accompanied by an Urban Design Statement (as set out above).</p>	<p>It is considered that this planning application includes all the necessary information pertaining to existing facilities in the area.</p> <p>There are three neighbourhood centre within a c. 1km of the subject site.</p> <p>It is envisioned that the development will be carried out in one phase.</p> <p>An Architect's Design Statement is included with the application</p> <p>The Community and Social Infrastructure Audit includes an assessment of the existing facilities, including schools, in the area.</p>
<p>16.16 Schools</p> <p>Planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand.</p>	<p>There are 2 no. primary schools and 1 no. post primary schools within 1km of the subject site.</p> <p>Please see the Community and Social Infrastructure Audit submitted with this application for further detail.</p>
<p>16.38 Car Parking Standards</p> <p>The Dublin City Council area is divided into three areas for the purpose of parking control, as shown on Map J.</p> <p>The car parking standards set out in Table 16.1 shall be generally regarded as the maximum parking provision.</p> <p>Parking provision below the maximum may be permitted provided it does not impact negatively on the amenities of surrounding properties or areas and there is no potential negative impact on traffic safety.</p>	<p>The subject site is located within Parking Zone 3 as shown in Map J of the Development Plan. For residential developments in this zone there is a maximum parking ratio of 1.5 spaces per dwelling.</p> <p>The proposed development provides 100 no. residential car parking spaces (ratio of 0.48 spaces per residential unit). This ratio is line with DCC policy and the 2020 Apartment Guidelines for reduced parking standards. It is considered an appropriate quality given the highly sustainable site location in terms of accessibility to public transport.</p>

16.38.4 Taxi Parking	
All applications for high density new development should include details of how taxis can be accommodated	The proposed development includes upgrades to the existing access road and includes surface parking spaces within the proposed development along the entrance into the site. This will ensure that taxis can easily access and serve the development.
16.38.5 Disabled Car Parking	
At least 5% of the total number of spaces should be designated car-parking spaces, with a minimum provision of at least one such space	The proposal includes 6% universal access car parking spaces.
16.38.6 Motorcycle Parking	
<p>New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 4% of the number of car parking spaces provided.</p> <p>Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.</p>	The proposal includes 6 no. motorcycle spaces (6% of the number of the car parking spaces provided).

Statement of Consistency with Draft Dublin City Council Development Plan 2022-2028

The draft Dublin City Council Development Plan 2022-2028 is due to be adopted in December 2022 and will replace the current Development Plan 2016-2022. This section reviews the proposal against the draft development plan. The policies and objectives have been updated in line with the proposed material amendments outlined in the July 2022 document prepared by Dublin City Council and the Chief Executives dated September and October 2022.

Zoning

The subject site is zoned Z1 'Sustainable Residential Neighbourhoods'. A small portion of the site is zoned Z9 'Amenity/Open Space Lands /Green Networks' in the draft development plan maps.

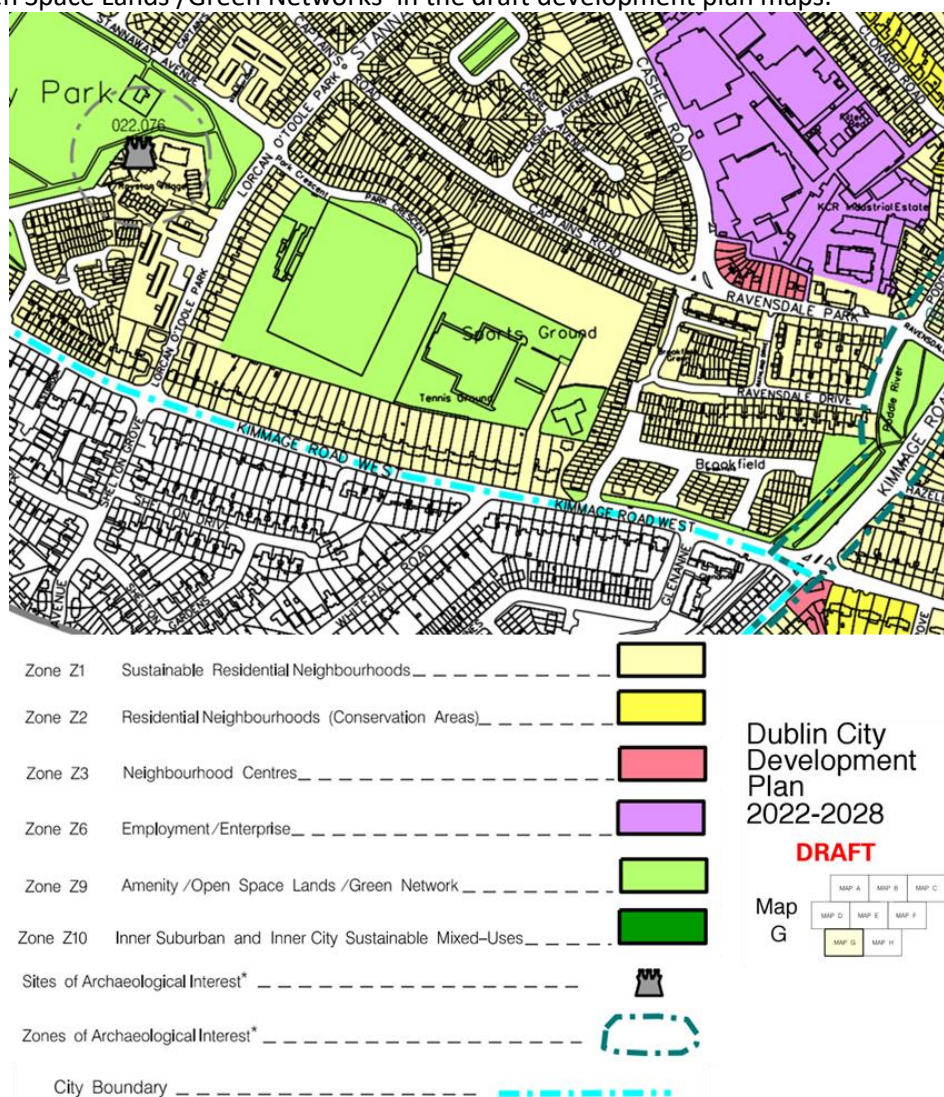
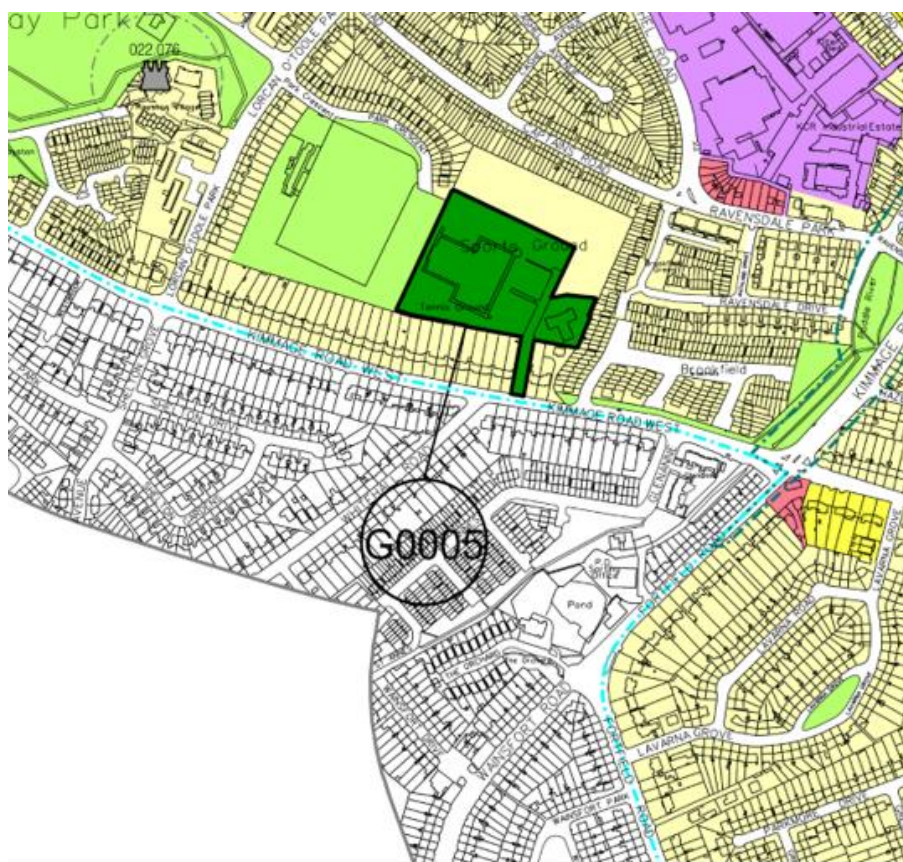


Figure 14 Land Use Zoning in Draft Development Plan 2022-2028

This small portion of Z9 zoning within the subject site is part of the larger Ben Dunne and Former Art Gallery site which are zoned Z9. It is noted that there is a proposed material amendment to change the zoning on the Ben Dunne/Former Art Gallery site from Z9/Z1 to Z10. In justifying this material amendment to the zoning, the chief executive's report notes:

"the subject lands do not currently function as open space and given the existence of a large public park and playing fields to the west, the proposed Z10 zoning is considered to reflect the current land

use on the site and will provide for appropriate mix of uses. It is considered that the zoning as Z10 is appropriate and will provide for the appropriate redevelopment of this underutilised site."



Dublin City Development Plan 2022-2028

Proposed Amendments to Draft Plan

Ben Dunne Gym & Former Art Gallery,

Kimmage Road West

Extract from Map G - G0005

Figure 15 Proposed Amendment to Draft Plan

Land-Use Zoning Objective Z1 (Sustainable Residential Neighbourhoods): To protect, provide and improve residential amenities.

Z1 – Permissible Uses

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

Z1 – Open for Consideration Uses

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

Evaluation of Consistency

The proposal will provide a residential development which is in line with this land use zoning and the permissible uses.

As with the current development plan land use zonings, a small portion of the site is zoned Z9 which is proposed to be amended to Z10. This piece of land provides the vehicular access to the site and the proposal will not change its existing land use and which remain permissible under the Z10 zoning if adopted as part of the new Development Plan to be adopted.

The following tables review Development Plan policies on urban design, residential, open space and landscaping and physical and social infrastructure as relevant to the proposed development.

Chapter 2 – Core Strategy	
Objectives	Evaluation of Consistency
Objective CS07 - Promote Delivery of Residential Development and Compact Growth To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.	The proposal will provide a high density scheme on this site within the built up area of Kimmage, in Dublin City which is zoned for residential development.

Chapter 3 – Climate Action	
Policy	Evaluation of Consistency
Policy CA1 National Climate Action Policy To support the implementation of national objectives on climate change including the 'Climate Action Plan 2021: Securing Our Future' (including any subsequent updates to or replacement thereof), the 'National Adaptation Framework' 2018 and the 'National Energy and Climate Plan for Ireland 2021-2030' and other relevant policy and legislation.	The proposal includes EV charging spaces, solar PV panels, SuDs features which all contribute to creating a sustainable development.
Policy CA2 Mitigation and Adaptation To prioritise and implement measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.	The drainage system has been designed to cater for a 1 in 100 year flood plus a 20% climate change factor.
Policy CA7 Climate Mitigation Actions in the Built Environment To require low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. See Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/provide for: a. building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b. sustainable building/services/site design to maximise energy efficiency;	The proposed layout will ensure that the proposed units and open spaces will all achieve good levels of daylight and sunlight. The proposal includes reduced car parking and a high provision of cycle parking which will encourage a modal shift away from car dependency. The layout will also provide pedestrian permeability throughout.

<p>c. sensitive energy efficiency improvements to existing buildings;</p> <p>d. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;</p> <p>e. on -site renewable energy infrastructure and renewable energy;</p> <p>f. minimising the generation of site and construction waste and maximising reuse or recycling;</p> <p>g. the use of construction materials that have low to zero embodied energy and CO2 emissions; and</p> <p>h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.</p>	<p>The building will be built to a high quality, ensuring maximum energy efficiency. Please see the Building Life Cycle Report and Energy Analysis Report for further detail.</p> <p>The proposal includes solar PV panels which will provide renewable energy to serve the development.</p> <p>Standard construction waste practices will be used to minimise the waste generated during the construction phase.</p>
<p>Policy CA8 Climate Adaptation Actions in the Built Environment</p> <p>Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings/services/site. The Council will promote and support development which is resilient to climate change. This would include:</p> <p>a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;</p> <p>b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;</p> <p>c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);</p> <p>d. reducing flood risk, damage to property from extreme events– residential, public and commercial;</p> <p>e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;</p> <p>f. promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure.</p>	<p>The proposal includes SuDS components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p> <p>An attenuation tank is proposed to cater for storm events up to and including the 1 in 100 year, plus 20% for climate change. The surface water is proposed to outfall to the storm water sewer on Kimmage Road West to the south of the site.</p> <p>In terms of flood risk, the Site Specific Flood Risk Assessment prepared by BMCE concludes that the proposed development falls in Flood Zone C and therefore, the proposed development is deemed “appropriate” in accordance with the guidelines of the OPW’s publication.</p>
<p>Policy CA9 Climate Action Energy Statements</p> <p>All new developments involving 30 residential units and/ or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.</p>	<p>An Energy Analysis prepared by IN2 has been submitted with this application. This report outlines how the proposed development will use low carbon energy and heating solutions.</p>
<p>Policy CA10 Energy from Renewable Sources</p> <p>To support, encourage, and facilitate the production of energy from renewable sources, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy,</p>	<p>The proposed development includes solar PV panels which will increase the proposed development’s energy consumption from renewable sources.</p>

combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations.	
Policy CA22 The Circular Economy To support the shift towards the circular economy approach as set out in a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, as updated together with The Whole of Government Circular Economy Strategy 2022- 2023. https://www.gov.ie/en/publication/b542d-whole-of-government-circular-economy-strategy-2022-2023-living-more-using-less/	The construction phase of the development will follow the latest standard construction waste practices.
Policy CA24 Electric Vehicles To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.	The proposal will include electric charging points as required by the development plan.
Policy CA25 Flood and Water Resource Resilience To support, encourage, and facilitate the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary.	The proposal includes SuDs features which will enhance flood and water resource resilience.

Chapter 4 – Space and Structure of the City	
Policy Objectives	Evaluation of Consistency
Policy SC5 Urban Design and Architectural Principles To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.	The proposal is in line with the principles set out in Chapter 15.
Policy SC8 Development of the Inner Suburbs To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.	The subject site is located within Kimmage, an outer suburb of Dublin City. The proposal will provide a high density scheme on this greenfield site, within the existing built up area and in close proximity to existing services and public transport.
Policy SC 10 Urban Density To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local	The proposal is in accordance with the principles set out in the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities and the Urban Design Manual.

<p>Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.</p>	
<p>Policy SC 11 Compact Growth In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:</p> <ul style="list-style-type: none"> - enhance the urban form and spatial structure of the city; - be appropriate to their context and respect the established character of the area; - include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; - be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; - and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. 	<p>The proposed will provide a high-quality residential development on this site within the existing built up environment.</p> <p>It is appropriate to the context and has been carefully designed to minimise any negative impact on the surrounding residential properties.</p> <p>There are a wide range of community facilities within a short distance of the subject site.</p> <p>The proposal has been designed in accordance with all relevant standards and guidance.</p>
<p>Policy SC 12 Housing Mix To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.</p>	<p>The proposal includes one and two bed social housing apartment units. This is an appropriate mix for the cater which primarily consists of larger terraced and semi-detached privately owned houses.</p>
<p>Policy SC 13 Green Infrastructure To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.</p>	<p>The proposal includes green spaces which provide communal and public open spaces to serve the development and the wider area. These green spaces will contribute to mitigating and adapting to climate change by providing a cooling effect for the urban environment, a habitat for flora and fauna, and drainage for surface water.</p>
<p>Policy SC 14 Building Height Strategy To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.</p>	<p>The proposed development includes heights up to 6 storeys. This is considered an appropriate height for this location and the proposal has been assessed against the Building Height Guidelines.</p>
<p>Policy SC16 Building Height Locations To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities</p>	<p>The proposed heights up to 6 storeys are considered appropriate for the location and will provide a positive addition to the area.</p>

and environmental sensitivities, protection of residential amenity and the established character of the area.	
<p>Policy SC17 Building Height</p> <p>To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:</p> <ul style="list-style-type: none"> • follow a design led approach; • include a masterplan for any site over 0.5ha (<u>in accordance with the criteria for assessment set out in Appendix 3</u>); • make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context; • deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and • have regard to the performance-based criteria set out in Appendix 3. 	<p>The proposed heights up to 6 storeys will make a positive contribution to the urban character of the area. They are not expected to affect the safety of aircraft operations at Dublin Airport.</p> <p>The proposal will help to create a vibrant, compact and walkable community.</p> <p>The proposal follows a design led approach and has had regard to the performance based criteria set out in Appendix 3.</p>
<p>Section 4.5.4 Increased Height as Part of the Urban Form and Spatial Structure of Dublin</p> <p>It is a requirement that a masterplan will be prepared for any site greater than 0.5ha to allow for the early testing of appropriate open space, sunlight, daylight, visual impacts wind effect etc. and that this is used to inform design development. Proposals seeking to optimise height in achieving higher densities must demonstrate how they will assist in delivering vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced and that respond positively to the existing or emerging context.</p>	<p>The Architects Design Statement provides a detailed assessment of the subject site and the proposal and demonstrates how it will integrate into and enhance the surrounding environment.</p>
<p>Policy SC 19 High Quality Architecture</p> <p>To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.</p>	<p>The proposed development will make a positive contribution to the built environment. It will provide a new public open space in the southern corner of the site and will provide strong frontages to the open spaces and public realm.</p>
<p>Policy SC 20 Urban Design</p> <p>Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013).</p>	<p>The proposal is in accordance with the Urban Design Manual and the Design Manual for Urban Roads and Streets (DMURS).</p>
<p>Policy SC 21 Architectural Design</p> <p>To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.</p>	<p>The proposal will provide a contemporary building on this greenfield site which will make a positive contribution to the character of the area while also being resilient to climate change.</p>

<p>Policy SC 22 Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.</p>	<p>The subject site is not located within an Architectural Conservation Area or located close to any protected structures.</p>
<p>Policy SC 23 Design Statements That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.</p>	<p>BKD Architects have prepared a Design Statement which is submitted with this application. This statement is in accordance with the principles set out in Chapter 15.</p>

Chapter 5 – Quality Housing and Sustainable Neighbourhoods	
Policy Objectives	Evaluation of Consistency
<p>Policy QHSN1 National and Regional Policy To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.</p>	<p>The proposed development will provide additional housing on this infill site within the existing built up area of Kimmage in Dublin City. This is in line with all regional and national policies.</p>
<p>Policy QHSN2 National Guidelines To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019) the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.</p>	<p>Compliance with <i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)</i> is demonstrated under the heading National and Regional policy section.</p> <p>We refer to the Schedule of Accommodation prepared by BKD Architects for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.</p>
<p>Policy QHSN3 Housing Strategy and HNDA (i) To secure the implementation of the Dublin City Council Housing Strategy (Appendix 1) in accordance with the provision of national legislation. (ii) To encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the city in accordance with the provisions of the Housing Need Demand Assessment and any future Regional HNDA.</p>	<p>The applicant has engaged with the Housing Department at Dublin City Council with regard to the implementation of the Dublin City Council Housing Strategy.</p> <p>The provision of these units, in a largely two storey housing area will enhance the unit typologies currently available in the area.</p>

<p>Policy QHSN4 Policy - Community Led Regeneration (added in with material amendments)</p> <p>It is the policy of Dublin City Council to ensure that regeneration of estates and communities will be planned with the needs of existing and future residents at the core.</p>	<p>The proposed development will provide new apartments at this suburban infill site in the established area of Kimmage, in close proximity to existing services and public transport options. The site is zoned for residential use and therefore considered appropriate for development to help with the consolidation of the urban area.</p>
<p>Policy QHSN5 Urban Consolidation</p> <p>To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation</p>	
<p>Policy QHSN8 Active Land Management</p> <p>To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.</p>	
<p>Policy QHSN9 Urban Density</p> <p>To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</p>	<p>The proposed development will provide a high density development which is cognisant of the character of the surrounding area.</p>
<p>Policy QHSN10 15-Minute City</p> <p>To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well-designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities, and sustainable modes of public and accessible transport where feasible.</p>	<p>There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools. The location of the site contributes to the accessibility of surrounding facilities for the daily needs of the residential development.</p>
<p>Policy QHSN11 Neighbourhood Development</p> <p>To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> - build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; - integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; - encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable 	<p>The proposed development will have a positive impact on the existing built up area of Kimmage, close in proximity to existing services and public transport options.</p> <p>The architectural design has taken the character of the surrounding area and sustainability into consideration throughout its design.</p> <p>Green spaces which provide communal and public open spaces incorporated into the layout of the development to</p>

<p>communities' whereby a range of facilities and services will be accessible within short walking or cycling distance;</p> <ul style="list-style-type: none"> - promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model. - promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance; - promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; - cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; - provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; - have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'; - are designed to promote safety and security and avoid anti-social behaviour. 	<p>serve both the proposed development and the wider area.</p>
<p>Policy QHSN13 High Quality Living Environment To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs</p>	<p>The proposed development supports the provision of high-quality living environment to both its residents and for the wider area by providing accessible public open space and is in close proximity to surrounding local facilities.</p>
<p>Policy QHSN15 Accessible Built Environment To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.</p>	<p>The proposed development has been carefully designed to respond to the existing built-up area of Kimmage. The proposal includes both communal and public open spaces that are accessible and offer high quality amenity space.</p>
<p>Policy QHSN16 Sustainable Neighbourhoods To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia, and people with disabilities.</p>	<p>This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.</p>

<p>Policy QHSN17 Needs of an Ageing Population</p> <p>To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2020.</p>	<p>The units of proposed development are designed to be suitable for older people/mobility impaired people and people with disabilities.</p>
<p>Policy QHSN18 Youth Friendly City</p> <p>To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy</p>	<p>The proposed development includes a public open space and is located in close proximity to numerous existing open spaces and sports facilities. These are outlined in detail in the Community and Social Infrastructure Audit.</p>
<p>Policy QHSN20 Gated Residential Development</p> <p>It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.</p>	<p>The proposed development will not be a gated residential development and will include accessible and permeable open spaces.</p>
<p>Policy QHSN21 Adaptable and Flexible Housing</p> <p>To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of the Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.</p>	<p>All units are sized to allow some minor internal reconfiguration and adaptation.</p>
<p>Policy QHSN23 Reconfiguration of Family Homes</p> <p>To support projects by Approved Housing Bodies and other organisations which enable older homeowners to reconfigure their family-sized homes in a way that meets the needs of an ageing population, creates new single occupancy rentals in an efficient and sustainable way, promotes intergenerational living and helps to regenerate mature urban neighbourhoods.</p>	<p>The proposed development will be completely operated by an Approved Housing Body. All units are sized to allow some minor internal reconfiguration and adaptation.</p>
<p>Policy QHSN24 Housing for People with Disabilities</p> <p>To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific</p>	<p>The units of proposed development are designed to be suitable for older people/mobility impaired people and people with disabilities</p>

purpose-built accommodation, including assisted/ supported living units, lifetime housing, and adaptation of existing properties.	
<p>Policy QHSNO10 Universal Design</p> <p>It is an Objective of Dublin City Council: To ensure, where feasible, that the layout of 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, subject to the criteria set out in the Section 28 Guidelines Sustainable Urban Housing: Design Standards for New Apartments.</p>	<p>All of the apartments exceed the minimum standards.</p> <p>The units are designed to be suitable for older people/mobility impaired people and people with disabilities.</p>
<p>Policy QHSN32 Social, Affordable Purchase and Cost Rental Housing</p> <p>To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLG&H's 'Social Housing Strategy 2020' and support the realisation of public housing.</p>	The proposed development will provide 100% social and affordable housing and will be managed by Co-Operative Housing Ireland.
<p>Policy QHSN34 High Quality Apartment Development</p> <p>To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.</p>	The proposed development will provide a high quality apartment development that includes quality private, communal and public amenity space and is located in close proximity to local facilities.
<p>Policy QHSN35 Houses and Apartments</p> <p>To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.</p>	The proposed development will provide Part V social housing suitable serving family, individuals, couples and empty nesters.
<p>Policy QHSN36 Housing and Apartment Mix</p> <p>To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.</p>	This proposal is for an attractive development which will provide for a new housing type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.
<p>Policy QHSN37 Management</p> <p>To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 20</p>	All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up-keep.

<p>Policy QHSN38 Build to Rent Accommodation</p> <p>To facilitate the provision of Build to Rent (BTR) Accommodation in the following specific locations:</p> <ul style="list-style-type: none"> - Within 500 metre walking distance of a significant employment locations. - Within 500 metres of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and - Within identified Strategic Development Regenerations Areas. <p>There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure there are opportunities for a sustainable mix of tenure and long term sustainable communities, a minimum of 40% of units within a development must be designed as standard apartments in accordance with the requirements set out in the Sustainable Urban Housing Design Standards for New Apartments, December 2020. There will be a presumption against the proliferation and over concentration of BTR development in any one area. In this regard, applications for BTR developments should be accompanied by an assessment of other permitted and proposed BTR developments within a 1km radius of the site to demonstrate</p> <ul style="list-style-type: none"> - that the development would not result in the overconcentration of one housing tenure in a particular area and take into account the location of the proposed BTR. - how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment. 	<p>N/A</p>
<p>Policy QHSN40 Built to Rent Accommodation</p> <p>To foster community both within a BTR scheme and to encourage its integration into the existing community, the applicant will be requested to provide an evidenced based analysis that the proposed resident support facilities are appropriate to the intended rental market having regard to the scale and location of the proposal. The applicant must also demonstrate how the BTR scheme must contribute to the sustainable development of the broader community and neighbourhood.</p>	<p>N/A</p>
<p>Policy QHSN42 Build to Rent/Student Accommodation/Co-living Development</p> <p>It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city.</p>	<p>N/A</p>
<p>Policy QHSN45 High Quality Neighbourhood and Community Facilities</p>	<p>A range of community facilities such as schools, public parks, amenity areas and</p>

<p>To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.</p>	<p>retail services are already available for the site. The proposed development will support local facilities and services. Please see the Community and Social Infrastructure Audit submitted with this application for further detail.</p> <p>It will also provide for a new attractive public realm and high quality communal and public amenity space.</p>
<p>Policy QHSN46 Community and Social Audit To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.</p>	<p>A Community and Social Infrastructure Audit has been completed and submitted as part of this application.</p>
<p>Policy QHSN48 Inclusive Social and Community Infrastructure To support the development of social and community infrastructure that is inclusive and accessible in its design and provides for needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse.</p>	<p>The proposed development provides for an apartment development along with a new public open space. It is adjacent to an existing gym and is within 500m-1km of a wide range of commercial, retail and education facilities.</p>
<p>Objective QHSN012 Community Safety Strategy That all housing developments over 100 units shall include a community safety strategy for implementation.</p>	<p>The design statement prepared by BKD Architects outlines how the proposal will</p> <ul style="list-style-type: none"> - provide passive surveillance of streets, open spaces and parking - avoid blank facades, dark or secluded areas - provide adequate lighting. Detail of this is also shown in the lighting plan submitted. - provide a distinction between public, communal, and private open space. This is also demonstrated in the landscape pack. - Provide clear routes for pedestrians and cyclists - Ensure vehicles entering the site maintain a suitably low speed. Further detail is also provided in the engineering reports. <p>It was not considered necessary to contact an Garda Síochána in relation to this application.</p>
<p>Section 5.5.8 Social and Community Infrastructure It is a policy of the Council to ensure that all residential applications comprising of 50 or more units shall include a</p>	<p>A Community and Social Infrastructure Audit has been completed and submitted as part of this application.</p>

community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and to identify whether there is a need to provide additional facilities to cater for the proposed development	
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Chapter 7 – The City Centre, Urban Villages and Retail	
Policy Objectives	Evaluation of Consistency
Policy CCUV37 Plan Active and Healthy Streets To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.	The scheme will provide accessible, permeable open space that will promote a safe walking, cycling environment and recreational space.
Policy CCUV38 High Quality Streets and Spaces To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender	The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing houses adjacent to the site. The proposed public realm and open spaces will also be of high quality.
Policy CCUV39 Permeable, Legible and Connected Public Realm To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.	The proposed layout and design ensure a permeable and legible development for all users. There are pedestrian pathways through the public realm which provide clear, accessible routes through the site.
Policy CCUV40 Public Safety To promote the development of a built environment and public spaces which are designed to deter crime and antisocial behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.	The layout and design of the scheme will provide a high-quality living environment where safety and convenience are of the utmost importance. Public open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.
Policy CCUV41 New Infrastructure Development Infrastructure projects in Dublin City should ensure placemaking outcomes through a design-led approach. Dublin City Council will work the relevant agencies / infrastructure providers to achieve public realm enhancements in the design, implementation and delivery of infrastructure projects.	The proposed development provides for an apartment development along with a new public open space. It is adjacent to an existing gym and is within 500m-1km of a wide range of commercial, retail and education facilities.

Chapter 8 – Sustainable Movement and Transportation	
Policy Objectives	Evaluation of Consistency
<p>Policy SMT1 Modal Shift and Compact Growth To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.</p>	<p>Walking and cycling are prioritised throughout the scheme. The site's proximity to high quality public transport and the provision of bicycle spaces to ensure a modal shift to a more sustainable mode of transport is encouraged on this infill site.</p> <p>The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk or cycle from the site.</p>
<p>Policy SMT4 Integration of Public Transport Services and Development To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.</p>	
<p>Policy SMT6 Mobility Management and Travel Planning To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.</p>	
<p>Policy SMT7 Travel Plans for New and Existing Developments To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.</p>	<p>A Residential Travel Plan by BMCE has been submitted as part of this application.</p>
<p>Policy SMT9 Public Realm in New Developments To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.</p>	<p>Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high quality public realm.</p> <p>The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing houses adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company.</p>
<p>Policy SMT10 Pedestrian Network To protect, improve and expand on the pedestrian network linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.</p>	<p>The location of the public open space is located close to existing pedestrian footpaths into the site from the access route. These will be improved as part of the development. Within the development a new pedestrian route is provided along the southern boundary connecting the blocks in an attractive, car free manner.</p>
<p>Policy SMT11 Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public</p>	

realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.	These pedestrian routes will provide accessibility for all in a safe manner.
Policy SMT12 Urban Villages and the 15-Minute City To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity, in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.	There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools.
Policy SMT15 Walking, Cycling and Active Travel To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.	As walking and cycling are prioritised throughout the scheme, the location of the site contributes to the aim of 15-minute city that encourages ease of accessibility to surrounding facilities for people of all ages and abilities by walking, cycling and public transport.
Policy SMT16 Active Travel Initiatives To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives.	Walking and cycling are prioritised throughout the scheme. The site's proximity to high quality public transport and the provision of bicycle spaces to ensure a modal shift to more sustainable and active modes of transport is encouraged.
Policy SMT 25 Car Parking in Residential and Mixed Use Developments (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed use developments.	Appendix 5 Table 2 requires a maximum of 208 no. car parking spaces for the proposal (1 per unit). The proposed 100 no. car parking spaces is below this maximum and is deemed an appropriate amount of parking due to the site's close proximity to high quality public transport.
Policy SMT 27 Expansion of the EV Charging Network To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.	The proposal will include 12 electric charging points as required by the development plan.
Objective SMT021 Feasibility Study of Residential and Non-Residential Car Parking Provision To carry out a feasibility study of the residential and non residential car parking provision across the city and urban villages and review the implementation of parking demand management strategies in areas where deemed appropriate and practicable.	The proposed development will provide 100 no. car parking spaces.
Policy SMT 30 Design Manual for Urban Roads and Streets To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within	A DMURS Statement prepared by the engineers is included with the planning application.

<p>the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.</p>	<p>The proposed development achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. Permeability for pedestrians and cyclists is prioritised throughout the scheme with pathways through the public open spaces.</p> <p>A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted in the main to the east of the site to ensure a predominantly car free environment.</p>
<p>Policy SMT 31 Street and Road Design To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.</p>	
<p>Policy SMT32 Traffic Calming and Self-Regulation Street Environments To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.</p>	

Chapter 9 – Sustainable Environmental Infrastructure and Flood Risk	
Policy Objectives	Evaluation of Consistency
<p>Policy SI1 Support for Irish Water To support and facilitate Irish Water in the provision of high-quality drinking water, water conservation and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the city and the Region</p>	<p>Communication has taken place with Irish Water for the provision of drinking water, water conservation and drainage infrastructure.</p>
<p>Policy SI2 Integrating Water Services with Development To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.</p>	<p>The site is well served with foul sewers on Kimmage Road West to the south. Irish Water have confirmed that a connection to these existing foul sewers is feasible without upgrade.</p>
<p>Policy SI3 Separation of Foul and Surface Water Drainage Systems To require all new development to provide separate foul and surface water drainage systems.</p>	<p>The site is well served with watermain on Kimmage Road West to the south and Captain Road to the east. Irish Water have confirmed connection to these existing watermain is feasible, but with certain upgrade works. The proposed development has been designed to provide for these upgrade works.</p> <p>The surface water is proposed to outfall to the storm water sewer on Kimmage Road West to the south of the site.</p>

<p>Policy SI4 Drainage Infrastructure Design Standards To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).</p>	<p>The proposed development will connect to an existing water drainage system along Kimmage Road West in compliance with Irish Water specifications.</p>
<p>Policy SI5 Safeguarding of Public Water Services Infrastructure To work in conjunction with Irish Water to safeguard existing water and drainage infrastructure by protecting existing wayleaves and buffer zones around public water service infrastructure.</p>	<p>Please refer drawings and reports by Barrett Mahony Civil and Structural Consulting Engineering enclosed with this application.</p>
<p>Policy SI6 Water Conservation To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources</p>	<p>Best practice water conservation and demand management measures are incorporated into the scheme.</p>
<p>Policy SI13 Minimising Flood Risk To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, coastal, reservoirs and dams, the piped water system and potential climate change impacts.</p>	<p>The Flood Risk Assessment identifies that the development falls in Flood Zone C, therefore a Justification test or a Stage 3 Detailed Flood Risk Assessment is not required. It notes that while some parts of the boundary lie within Flood Zone A and Flood Zone B, no proposed buildings are proposed in these areas and as such the development falls within Flood Zone C.</p>
<p>Policy SI14 Strategic Flood Risk Assessment To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.</p>	<p>The Site Specific Flood Risk Assessment prepared by BMCE concludes that the proposed development falls in Flood Zone C and therefore, the proposed development is deemed “appropriate” in accordance with the guidelines of the OPW’s publication.</p>
<p>Policy SI15 Site-Specific Flood Risk Assessment All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> - The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan. - The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change 	<p>Please refer to Flood Risk Assessment by Barrett Mahony Civil and Structural Consulting Engineering enclosed with this application</p>

<p>and those associated with existing flood defences. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA</p> <ul style="list-style-type: none"> - On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management). There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them. 	
<p>Policy SI20 Basement Flood Risk Management That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).</p>	<p>The Site Specific Flood Risk Assessment prepared by BMCE concludes that the proposed development falls in Flood Zone C</p>
<p>Policy SI21 Managing Surface Water Flood Risk To minimise flood risk arising from pluvial (surface water) flooding in the city by promoting the use of natural or nature-based flood risk management measures as a priority and by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits and climate adaption.</p>	<p>The proposed development includes SuDs components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p> <p>There is an existing surface water drainage system to the south of the site running along Kimmage Road West.</p> <p>An attenuation tank is proposed to cater for storm events up to and including the 1 in 100 year, plus 20% for climate change. The surface water is proposed to outfall to the storm water sewer on Kimmage Road West to the south of the site.</p>
<p>Policy SI22 Sustainable Drainage Systems To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/</p>	<p>The proposal includes Sustainable Drainage Systems (SuDS) components including blue roof and extensive</p>

<p>Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.</p>	<p>sedum green roofs, intensive green roofs, and permeable paving.</p>
<p>Policy SI23 Green Blue Roofs To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green and Blue Roof Guide (2021) which is summarised in Appendix 11.</p>	
<p>Policy SI24 Control of Paving of Private Driveways / Vehicular Entrances / Grassed Areas To require that all surface water run-off from new/ extended domestic driveways, repaired/ replacement driveways and vehicular entrances (where such development is not exempted from the requirement to obtain planning permission) is managed through the use of SuDS, ensuring no increase in surface water discharges to the public drainage network (for further guidance please refer to Appendices 5 and 12).</p>	<p>The proposed development includes permeable paving as a SuDS measure for surface water discharge.</p>
<p>Policy SI25 Surface Water Management To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.</p>	<p>The proposal has been designed in accordance with the councils surface water management guidance.</p>
<p>Policy SI26 Taking in Charge of Private Drainage Infrastructure To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be to designed to taking in charge standards)</p>	<p>The proposed drainage infrastructure will comply with standards set out in Greater Dublin Regional Code of Practice for Drainage Works.</p> <p>The proposed development does not include any lands to be taken in charge.</p>
<p>Policy SI27 Sustainable Waste Management To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City 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 support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).</p>	<p>Please see Construction Waste Management Plan was prepared by BMCE and an Operational Waste and Recycling Management Plan was prepared by Traynor Environmental enclosed with this application.</p>

<p>Policy SI28 Sustainable Waste Management To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order develop Dublin as a circular city and to safeguard against environmental pollution</p>	<p>Please see Construction Waste Management Plan was prepared by BMCE and an Operational Waste and Recycling Management Plan was prepared by Traynor Environmental enclosed with this application.</p>
<p>Policy SI29 Segregated Storage and Collection of Waste Streams To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance see Appendix 7).</p>	<p>Please see Operational Waste and Recycling Management Plan was prepared by Traynor Environmental enclosed with this application.</p>
<p>Policy SI30 Waste Management in Apartment Schemes To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).</p>	
<p>Policy SI41 Lighting Standards To provide and maintain high quality and appropriate street/ outdoor lighting on public roads/ footways/ cycleways/ public realm throughout the city in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates.</p>	<p>The proposal includes a lighting layout which will ensure all public areas area adequately lit.</p>
<p>Policy SI42 Light Pollution To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.</p>	<p>The lighting proposal will not result in unnecessary, inappropriate or excessive artificial lighting.</p>
<p>Policy SI43 Energy Efficient Lighting To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.</p>	<p>The lighting layout will ensure the proposal is appropriately lit.</p>

Chapter 10 – Green Infrastructure and Recreation	
Policy Objectives	Evaluation of Consistency
<p>Policy GI1 Green Infrastructure Assets To identify and protect the integrity of the city's GI assets, as appropriate, and to enhance and expand the connectivity, multi-</p>	<p>The provision of a new public open space will further enhance and</p>

<p>functionality, and accessibility of the city's green infrastructure network, while addressing gaps in the network.</p>	<p>promote the existing green infrastructure in the area.</p>
<p>Policy GI2 Connectivity To develop an interconnected green infrastructure network of strategic natural and semi-natural areas with other environmental features including green spaces, rivers, canals, the coastal and marine area and other physical features including streets and civic spaces that supports ecological, wildlife, and social connectivity.</p>	<p>The proposal includes a pedestrian route along the southern boundary of the site which will provide a safe route for pedestrians through the site.</p> <p>All public and communal spaces will be landscaped and planted with trees/shrubs to improve tree cover and enhance biodiversity on site.</p>
<p>Policy GI3 Multi-functionality To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multifunctionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.</p>	<p>The layout ensures that all open spaces and routes are overlooked providing a strong sense of safety with passive surveillance.</p>
<p>Policy GI4 Accessibility To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed</p>	<p>The proposal will enhance biodiversity the site through appropriate landscaping of open spaces designed for accessibility and permeability.</p>
<p>Policy GI5 Greening of Public Realm / Streets To integrate urban greening features including nature based solutions into the existing public realm where feasible and into the design of public realm projects for civic spaces and streets. The installation of living green walls will be encouraged to the fullest possible extent throughout the city of Dublin and tree pits with mixed planting will be preferred for the greening of streets in recognition of the co-benefits they offer for SuDs, biodiversity, amenity value and traffic calming.</p>	<p>All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site.</p> <p>The proposal has been designed to incorporate SUDS features which naturally reduce pollutants and improve water quality.</p>
<p>Policy GI6 New Development / New Growth Areas To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.</p>	
<p>Policy GI7 Connecting Greening Elements in Site Design To avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green</p>	<p>A green leisurely walk is proposed along this boundary, which will act as a green link through the site. This route</p>

infrastructure / the public realm where feasible and to provide for ecological functions.	<p>will have pedestrian priority and will benefit from the south-facing aspect.</p> <p>Soft landscape will be included as means of providing greenery along the development's streetscape.</p>
Objective GIO1 Green Roof Guidance Document (2021) The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green and Blue Roof Guide Document (2021), see Appendix 11.	The proposed development includes SuDs components including blue roof and extensive sedum green roofs and intensive green roofs in line with requirements.
Objective GIO5 Design Guide for Public Open Space To implement the forthcoming Dublin City Council Parks, Public Open Space Design Guide	Public open space provided within the proposed development will be in line with the Dublin City Council Parks, Public Open Space Design Guide
Policy GI16 Habitat Creation and New Development That new developments as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.	<p>Public and communal spaces will be landscaped and planted with native species of trees and shrubs to enhance biodiversity on site.</p> <p>The proposal has been designed to incorporate SUDS features which naturally reduce pollutants and improve water quality. Blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p> <p>As noted in the EclA, the site is not suitable for swift nesting and therefore no swift nesting boxes are proposed.</p>
Policy GI19 Protect and Enhance Landscapes To continue to protect and enhance the city's landscape and seascape, the amenities of places and features of natural beauty and interest, through sustainable planning and design for both the existing community and for future generations in accordance with the National Landscape Strategy 2015 – 2025 and any updated strategy.	The surrounding landscape/townscape can be considered to have a high capacity to accommodate change of the type proposed. The new proposal includes substantial vegetation and new tree planting to integrate the new development into the surrounding townscape.
Policy GI20 Views and Prospects To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.	The proposed development will be a recognisable visual change in the area but it will integrate into the local built pattern and skyline.
Policy GI21 Promote City Landscape To promote the city landscapes, including rivers, canals, Dublin Mountains and Dublin Bay, as a major resource for the city and forming core areas of the green infrastructure network	The new proposal includes substantial vegetation and new tree planting to integrate the new development into the surrounding townscape.
Policy GI22 Managed Access	Please refer to the Building Life Cycle Report prepared by BKD Architects

<p>To provide managed access to landscape and amenity areas of Dublin city while ensuring their long-term protection and maintenance to limit degradation</p>	<p>with regards to the management and maintenance of public open spaces within the proposed development.</p>
<p>Policy GI24 Multi-Functionality To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).</p>	<p>All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site.</p> <p>The proposal has been designed to incorporate SUDS features.</p> <p>A green leisurely walk is proposed along this boundary, which will act as a green link through the site. This route will have pedestrian priority and will benefit from the south-facing aspect.</p> <p>Soft landscape will be included as means of providing greenery along the development's streetscape and enhancing public realm.</p>
<p>Policy GI25 Open Space Provision (sq. m.) per 1,000 Persons Benchmark To ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard, a city wide range of 2.5ha to 3.6ha of parks per 1,000 population benchmark for green/ recreational space as set out in the 2019 Parks Strategy (or as updated) shall be a policy goal and quality standard.</p>	<p>The proposal includes both communal and public open spaces that are accessible and offer high quality amenity space. This will provide open amenity space for residents and for the wider area.</p>
<p>Policy GI26 Securing Acquisition of Additional Public Open Space To give priority to acquiring new public open space on-site, particularly in areas identified in the Council's Parks Strategy 2019 as deficient in public open space. Where it is not feasible or realistic on site, the Council will require a financial contribution in lieu of provision to provide appropriate open space in the vicinity. The methodology for calculating this contribution shall be included in the City's Development Contribution Scheme.</p>	<p>The proposal includes 10% public open space on site. This was considered appropriate, useable open space by DCC and ABP in the SHD Proposal this has not been altered. It is therefore considered the quantum is met, however if DCC disagree a financial contribution in lieu of public open space could be requested by way of condition.</p>
<p>Policy GI28 New Residential Development To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.</p>	<p>The provision of a new public open space will further enhance and promote the public amenity space in the area.</p>

<p>Objective GIO25 Facilities and Amenities in Parks/Public Open Spaces</p> <p>To continue to provide and improve visitor facilities in parks and public open spaces, including cafés, kiosks, toilets, shower and changing-room facilities, water fountains and dog parks etc. and to ensure that such features are accessibly designed. To encourage and facilitate the introduction of amenities in parks such as table tennis, outdoor gyms, adult exercise equipment, bowling greens, etc.</p>	<p>The proposal includes a pedestrian route along the southern boundary of the site which will provide a safe route for pedestrians through the site.</p> <p>The diverse range of open space provided within the scheme provide opportunities for informal recreation and play which will be overlooked by adjacent blocks.</p>
<p>Policy GI40 Tree Planting - General</p> <p>To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.</p>	<p>All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site. Landscaped areas will be planted with native species of trees and shrubs to enhance biodiversity on site.</p> <p>Semi-mature trees are proposed to be planted in these locations to act as a visual buffer between the new development and established residential properties.</p>
<p>Policy GI41 Protect Existing Trees as Part of New Development</p> <p>To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.</p>	<p>Existing trees along the northern, eastern and western boundary will be retained where possible and semi-mature trees are proposed to be planted.</p>
<p>Policy GI42 Tree Management</p> <p>To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile and as per Dublin City Tree Strategy 2016 or as updated.</p>	<p>An Arboricultural Assessment, Impact Statement & Method Statement by Arbeco Ltd is enclosed with this application.</p>
<p>Policy GI43 Hedgerows</p> <p>To protect and enhance the City's hedgerow network, in particular, hedgerows that form townland, parish and barony boundaries. It is Council policy to increase hedgerow coverage and promote the planting of hedgerows in new developments using native species.</p>	<p>Please see Arboricultural Assessment, Impact Statement & Method Statement by Arbeco Ltd is enclosed with this application</p>
<p>Objective GIO40 Forthcoming Dublin City Tree Strategy 2016</p> <p>To support the implementation of the Dublin City Tree Strategy 2016 and any future revision thereof, which sets a vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City</p>	<p>The proposed development supports the implementation of the Dublin City Tree Strategy 2016.</p>
<p>Objective GIO41 Trees as Wildlife Corridor or 'Stepping Stones'</p>	<p>An Ecological Impact Assessment by Moore Group - Environmental Services</p>

<p>To protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.</p>	<p>was carried out and enclosed with this application.</p>
<p>Policy GI51 Children's Playing Facilities - General To seek the provision of children's playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds</p>	<p>The diverse range of open space provided within the scheme provide opportunities for informal recreation and play which will be overlooked by adjacent blocks.</p>
<p>Policy GI52 Children's Playing Facilities in New Residential Developments To seek the provision of children's playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.</p>	
<p>Objective GIO49 Play Friendly Communities To support and encourage the development of play-friendly communities that provide time and space and permission for 'everyday street play', opportunities and experiences and play in urban public space.</p>	
<p>Section 10.5.1 Existing and new developments, streets and the public realm will need to retain natural habitats and existing trees where feasible and also to include increased provision of urban greening features including green roofs, walls and nature based solutions, including sustainable drainage systems (SuDs).</p>	<p>All public and communal spaces will be landscaped and planted with trees/shrubs to enhance biodiversity on site. Landscaped areas will be planted with native species of trees and shrubs to enhance biodiversity on site.</p> <p>Semi-mature trees are proposed to be planted in these locations to act as a visual buffer between the new development and established residential properties. Existing trees along the northern, eastern and western boundary will be retained where possible and semi-mature trees are proposed to be planted.</p> <p>The proposal includes Sustainable Drainage Systems (SuDs) components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p>
<p>Chapter 12 Culture Objective CUO22 SDRAs and large Scale Developments</p>	<p>The site is located north east of the Nora Dunne Art Gallery. Although this former</p>

<p>All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide for 5% community, arts and culture spaces including exhibition, performance and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.</p> <p>*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence to justify the 5% going to one sector.</p>	<p>art gallery is currently closed, the building provides an appropriate community, arts and culture space in close proximity to the proposed development. As such it is not considered necessary or appropriate to include further community space within the subject site. This conclusion is confirmed by the Community and Social Infrastructure Audit which is submitted with this application.</p>
<p>Objective CU026 Co-Design and Audits Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (COU38 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.</p>	<p>A Community and Social Infrastructure Audit has been completed and submitted with this application.</p>
<p>Objective CU054 Public Art All large scale regeneration schemes, whether lodged for planning as a single or multiple applications; where the total scale of regeneration exceeds 25,000 sq. m. shall be required to include an element of public art.</p>	<p>Public art can be incorporated into the public open space.</p>

Chapter 14 – Land Use Zoning	
Zoning	Evaluation of Consistency
<p>Section 14.7.1 Sustainable Residential Neighbourhoods – Zone Z1 The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.</p>	<p>The proposed development will provide one and two bed social and affordable housing units within the existing built up environment of Kimmage. There is good access to recreational, community, and leisure services and employment from this site. This will ensure a good quality of life for the future residents.</p>

In both new and established residential areas, there will be a range of uses that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship with the immediate community and have high standards of amenity, such as childcare facilities, schools, community facilities, personal services, local shops, open space, recreation and amenity uses	The subject site benefits from close proximity to a wide range of facilities and amenities.
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Chapter 15 – Development Standards	
<p>Table 15-1 outlines the documents required to accompany planning applications for residential developments. These are</p> <ul style="list-style-type: none"> - Architectural Design Report - Housing Quality Assessment - Landscape Design Report - Planning Report - Daylight and Sunlight Assessment - Community and Social Audit - Lifecycle Report - Community Safety Strategy - Operational Management Statement - Traffic and Transport Assessment - Mobility Management Plan/Travel Plan - Road Safety Audit - Service Delivery and Access Strategy (for Backland Development) - Engineering Services Report (Civil and Structural) - Construction Management Plan - Construction Demolition Waste Management Plan - Operational Waste Management Plan - Climate Action and Energy Statement (including District Heating) - Surface Water Management Plan - AA Screening - EIA Screening 	<p>These documents are all included with the application.</p> <p>The Surface Water Management Plan is detailed within the Infrastructure Report prepared by BMCE.</p>
<p>Section 15.5.5 Density</p> <p>All proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.</p>	<p>As noted in the social and community audit, there are a variety of community facilities and social infrastructure in the area to serve the site.</p>
<p>Section 15.5.7 Materials and Finishes</p> <p>All developments will be required to include details on the maintenance and management of the materials proposed. As such, Dublin City Council will require developments:</p> <ul style="list-style-type: none"> • To ensure materials and finishes complement the existing pallet of materials in the surrounding area. • Promote durability to ensure a good visual appearance over time. 	<p>Please see the Architecture Design Statement and Building Life Cycle for further information.</p>

<ul style="list-style-type: none"> • The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. • To support the use of structural materials that have low to zero embodied energy and CO2 emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials 	
<p>Section 15.5.8 Architectural Design Statements Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation.</p>	<p>BKD Architects have prepared an Architectural Design Statement which analyses the context and constraints of the site and includes a detailed design of the development.</p>
<p>Table 15-2 provides a list of information requirements for design statements as follows:</p> <ul style="list-style-type: none"> • Site Location and Description • Context and Setting • Urban Design Rationale • Design Evolution / Alternatives Considered • Block Layout and Design • Site Connectivity and Permeability • Height, Scale and Massing • Materials and Finishes • Open Space (Private, Communal, Public) • Public Realm Contribution • Compliance with Internal Design Standards • Daylight and Sunlight • Overlooking, Overbearing, Overshadowing • Car and Cycle Parking • Management/Lifecycle Report • Compliance with DMURS • Safety and Security • Universal Access 	<p>The Design Statement includes information on all these requirements.</p>
<p>Section 15.8.6 Public Open Space The public open space requirement for residential developments shall be 10% of the overall site area as public open space.</p>	<p>The proposal includes 10% public open space.</p>
<p>Section 15.8.7 Financial Contributions in Lieu of Open Space. Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park. In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as</p>	<p>If the council considered the public open space provided to be below the 10% requirement, a financial contribution can be provided by the developer.</p>

set out in the City Council Parks Programme, in fulfilment of this objective.	
<p>Section 15.8.8 Play Infrastructure</p> <p>Applications which include the provision of public open space shall be subject to a requirement to provide for appropriate playground facilities.</p> <p>In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition</p>	<p>Due to the unit mix proposed, it is not expected that the proposed development will generate a significant number of children. Nonetheless, the proposed open spaces will provide space for recreation and leisure.</p> <p>Dedicated children's play areas can be incorporated into the open spaces if the council deems this appropriate.</p>
<p>Section 15.9.2 Unit Size /Layout</p> <p>2 bedroom, 3 person units will be restricted to a maximum of 10% of the overall unit mix.</p>	The proposal does not include any 3-person, 2 bedroom units.
<p>Section 15.9.2 Unit Size /Layout</p> <p>Layouts and dimensions should allow for the delivery of furniture and facilitate home working where feasible. For larger dwellings, the provision of one main living room separate from a combined kitchen/ dining area should be considered</p> <p>50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people and people with disabilities</p>	All of the units exceed the minimum sizes and are designed to be suitable for older people.
<p>Section 15.9.3 Dual Aspect</p> <p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.</p> <p>In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances.</p>	The proposal includes 52.9% dual aspect units.
<p>Section 15.9.7 Private Amenity Space</p> <p>Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment.</p>	The private amenity spaces are all accessed off the main living area in the apartment.
<p>Section 15.9.8 Communal Amenity Space</p> <p>Development proposals shall demonstrate that the communal open space:</p> <ul style="list-style-type: none"> • Complies with the minimum standards based on each individual unit. • Will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics. 	<p>The proposal includes 1,619sqm communal open space which exceeds the requirement for 1,248sqm communal open space (based on the 2020 Apartment Guidelines requirements)</p> <p>The communal open spaces will be safe and secure with overlooking and</p>

<ul style="list-style-type: none"> • Is secure for residents and benefits from passive surveillance. • Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all. • Achieves good sunlight penetration – see Appendix 16. • Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections 	<p>passive surveillance provided by the apartment blocks. The spaces also achieve good levels of daylight and sunlight, as shown the daylight analysis.</p> <p>Detail of the planting is provided in the landscaping pack details of the drainage is provided in the engineering pack.</p>
<p>Section 15.9.9 Roof Terraces Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space.</p>	<p>The proposal does not include roof terraces.</p>
<p>Section 15.9.10 Internal Communal Facilities Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>Due to the existing community facilities in the area, the proposal does not include communal facilities.</p>
<p>Section 15.9.11 Security The location of entrance doors and lobbies should be located in highly visible areas of the building and should be well lit and overlooked.</p> <p>Ground floor level apartments should be provided with a privacy strip of approximately 1.5m in order to maintain adequate security and privacy within the unit.</p>	<p>The entrance doors and lobbies are all located in highly visible areas.</p> <p>A privacy strip is provided along the ground floor apartments.</p>
<p>Section 15.9.14 Lifecycle Reports The reports should address each of the following headings:</p> <ul style="list-style-type: none"> • Assessment of Long Term Running and Maintenance Costs <ul style="list-style-type: none"> • Property / Owner Management Company and Common Areas • Service Charge Budget • Measures to Manage and Reduce Costs <ul style="list-style-type: none"> • Treatment, Materials and Finishes • Construction Methodology • Material Specification • Landscaping • Waste Management • Human Health and Well –being • Residential Management • Energy and Carbon Emissions • Transport and Accessibility 	<p>A Building Life Cycle Report has been prepared by BKD Architects which assesses each of these headings.</p>
<p>Section 15.9.15 Operational Management and Maintenance All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>The proposed development will be managed by a property management company. Please see the Operational Management Statement prepared by Lioncor and submitted with this application.</p>

<p>Section 15.6.16 Microclimate All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind.</p>	<p>A Daylight Sunlight Assessment and Microclimate Wind Analysis have been prepared by IN2.</p>
<p>Section 15.9.17 Separation Distances (Apartments) Traditionally a minimum distance of 22m is required between opposing first floor windows. 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. Separation distances between buildings will be assessed on a case by case basis.</p> <p>In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.</p>	<p>The separation distances between the proposed apartment blocks and the existing adjacent houses exceeds the minimum separation distance of 22m.</p>
<p>Section 15.13.4 Backland Housing Applications for backland housing should consider the following:</p> <ul style="list-style-type: none"> • Compliance with relevant residential design standards in relation to unit size, room size, private open space etc. • Provision of adequate separation distances to ensure privacy is maintained and overlooking is minimised. • That safe and secure access for car parking and service and maintenance vehicles is provided. • The scale, form and massing of the existing properties and interrelationship with the proposed backland development. • The impacts on the either the amenity of the existing properties in terms of daylight, sunlight, visual impact etc. or on the amenity obtained with the unit itself. • The materials and finishes proposed with regard to existing character of the area. • A proposed backland dwelling shall be located not less than 15 metres from the rear façade of the existing dwelling, and with a minimum rear garden depth of 7 metres. • A relaxation in rear garden length, may be acceptable, once sufficient open space provided to serve the proposed dwelling and the applicant can demonstrate that the proposed backland dwelling will not impact negatively on adjoining residential amenity 	<p>The proposal is in line with all residential standards and separation distances.</p> <p>The daylight impact on neighbouring properties has been assessed in the report prepared by IN2. The scheme is considered to be fully compliant with the most recent BRE 2022 Guidelines.</p> <p>The design and materials will make a positive contribution to the character of the area.</p>
<p>Section 15.17.2 Public Lighting Applications for new roads and / or public spaces should ensure that the area is appropriately lit for accessibility and safety. Development proposals for public lighting shall include:</p> <ul style="list-style-type: none"> • Details of the column height, siting and location of the lighting. • Details of the specific lantern type and design. • Details of lighting specification including lighting class, lux levels and energy efficiencies. 	<p>The subject site includes the access road off Kimmage Road West and part of Kimmage Road West. There are no proposed works to Kimmage Road West and the road is included to provide drainage to the subject site.</p>

<ul style="list-style-type: none"> • Site lighting report to assess the impact of light overspill to the surrounding area. Site lighting should also be considered throughout construction period and the impact on the surrounding properties. Details of such should be included in the construction management plan. 	The proposal includes lighting to the proposed public realm. Details of the lighting is shown on the lighting plan is included with this application
Section 15.18.1 Construction Management All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan.	A preliminary construction management plan has been prepared by BMCE and submitted with this application.
Section 15.18.2 Waste Management All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both a Construction and Operational Waste Management Plan.	A Construction Waste Management Plan was prepared by BMCE and an Operational Waste and Recycling Management Plan was prepared by Traynor Environmental.

Appendix 1 Housing Need Demand Assessment (HNDA)	
Decline in the proportion of one-person, four-person, and five plus person households and an increase in the proportion of two-person and three-person households.	The proposal includes 50% one bed units and 50% two bed units which will support the changing household needs in Dublin City Council area.
To require that 20 percent of land zoned for residential use, or for a mixture of residential and other uses for development of four or more units or development of units on land more than 0.1 hectares be reserved for the provision of, social, affordable purchase and cost rental housing in accordance with Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021	The proposed development will provide 100% social and affordable housing and will be managed by Co-operative Housing Ireland. Please see the letter enclosed with this application.
To provide for social, affordable purchase and cost rental housing over the Plan period to meet forecast future housing need as identified in the housing strategy and interim HNDA.	
To provide for social, affordable purchase and cost rental housing accommodation through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, leasing, and housing supports including RAS and HAP or any other mechanism promoted or forthcoming under Government Housing Policy	
This housing strategy will support an objective to ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019	<p>All of the apartments exceed the minimum standards.</p> <p>The units are designed to be suitable for older people/mobility impaired people and people with disabilities.</p>

Appendix 3 Compact Growth, Density and Building Height	
At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street	The proposal includes heights up to 6 storeys which is within this range.

scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height.																
The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity.	The proposed development respects the existing character of the area and has been designed to respect both existing and future residential amenity.															
All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods	The proposal will bring this vacant, zoned, greenfield site into active use and															
As a general rule the following density ranges will be supported in the city. <table><tr><td>Location</td><td>Net Density Ranges (uph)</td></tr><tr><td>City Centre and Canal Belt</td><td>100-250</td></tr><tr><td>SDRA</td><td>100-250</td></tr><tr><td>SDZ/LAP</td><td>As per SDZ Planning Scheme/LAP</td></tr><tr><td>Key Urban Village</td><td>60-150</td></tr><tr><td>Former Z6</td><td>100-150</td></tr><tr><td>Outer Suburbs</td><td>60-120</td></tr></table>	Location	Net Density Ranges (uph)	City Centre and Canal Belt	100-250	SDRA	100-250	SDZ/LAP	As per SDZ Planning Scheme/LAP	Key Urban Village	60-150	Former Z6	100-150	Outer Suburbs	60-120	The proposed density of 166.4uph is slightly above the indicative range for an outer suburbs site but is considered an appropriate density for this site in an otherwise low-density area. It is also noted that this density was accepted by both DCC and An Bord Pleanála in granted the SHD on site under ABP313043	
Location	Net Density Ranges (uph)															
City Centre and Canal Belt	100-250															
SDRA	100-250															
SDZ/LAP	As per SDZ Planning Scheme/LAP															
Key Urban Village	60-150															
Former Z6	100-150															
Outer Suburbs	60-120															
There will be a general presumption against schemes in excess of 300 units per hectare	The proposed density of 166.4uph is below 300uph and is considered acceptable for this site.															
All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage	The proposal has a density of 166.4units per ha and 249.6 beds per ha, a site coverage of 43.1%, and a plot ratio of 1.63:1.															
Indicative Plot Ratio and Site Coverage set out below. <table><tr><td>Area</td><td>Plot Ratio</td><td>Site Coverage</td></tr><tr><td>Central</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential</td><td>1.0-2.5</td><td>45-60%</td></tr></table>	Area	Plot Ratio	Site Coverage	Central	2.5-3.0	60-90%	Regeneration	1.5-3.0	50-60%	Conservation	1.5-2.0	45-50%	Outer Employment and Residential	1.0-2.5	45-60%	<p>The proposed plot ratio of 1.63 is within the range for this site in an outer employment and residential area.</p> <p>The site coverage of 43.1% is slightly below the indicative range for an outer employment and residential area but is considered appropriate for the site.</p>
Area	Plot Ratio	Site Coverage														
Central	2.5-3.0	60-90%														
Regeneration	1.5-3.0	50-60%														
Conservation	1.5-2.0	45-50%														
Outer Employment and Residential	1.0-2.5	45-60%														
Higher plot ratio and site coverage may be permitted in certain circumstances such as: <ul style="list-style-type: none">• Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.• To facilitate comprehensive re-development in areas in need of urban renewal.• To maintain existing streetscape profiles.• Where a site already has the benefit of a higher plot ratio.	The proposal provides a plot ratio and site coverage in line with the ranges for the subject site.															

<ul style="list-style-type: none"> • To facilitate the strategic role of significant institution/employers such as hospitals 	
All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3.	The proposal has been assessed against the criteria in Table 3 below.
<p>Masterplans</p> <p>The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publicly accessible and private open spaces will fit within the existing and planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open space quantum's, sunlight, daylight, visual impact and wind effects.</p> <p>Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan.</p> <p>Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context</p>	<p>The site is an undeveloped greenfield site located within the otherwise built up area of Kimmage, Dublin and there is limited scope within the site create new routes to the wider area. The proposed apartment blocks will provide a strong urban frontage to the boundary with Ben Dunne gym to the south.</p> <p>The architectural design statement demonstrates the site constraints that led to the proposed design.</p> <p>The proposal will provide a high-quality residential apartment development within the existing built up environment of Dublin City. The proposal will provide public and communal open spaces and has been designed to be as permeable and walkable for pedestrians as possible. It is intended that the proposal will be constructed in one phase. Please see the drawings and documents prepared by BMCE for details on the surface water management.</p> <p>CGIs and photomontages have been prepared by 3D Design Bureau and a Townscape and Visual Impact Assessment has been prepared by AECOM.</p>
Landmark/tall buildings are generally considered to be those that are substantially taller than their surroundings and cause a significant change to the skyline. They are typically buildings greater than 50 metres in height.	The proposed development is c. 21m in height and is therefore not considered a tall/landmark building.

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale	
<p>Objective 1: To promote development with a sense of place and character</p> <p>Enhanced density and scale should:</p>	The proposed development will provide social and affordable housing within 5 no. apartment blocks

<ul style="list-style-type: none"> • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed. 	<p>within the existing built-up environment of Kimmage.</p> <p>The blocks have been carefully designed and located to minimise any negative impact on the adjacent residential properties. The upper floors are stepped back from the northern boundary which will minimise overlooking and the impact on daylight and sunlight.</p> <p>The proposal will include a public open space in the southern corner of the site, adjacent to the (currently vacant) art gallery. This will provide the opportunity to create a small community hub with the community building and public open space adjacent to each other.</p> <p>Blocks 4 and 5 are joined with a step in the facades to avoid creating a monolithic long slab block.</p>
<p>Objective 2: To provide appropriate legibility Enhanced density and scale should:</p> <ul style="list-style-type: none"> • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability. 	<p>The proposed development will provide a strong frontage to the southern boundary with Ben Dunne Gym which help create a sense of enclosure and place on the gym site.</p>
<p>Objective 3: To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should:</p> <ul style="list-style-type: none"> • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest. 	<p>The proposed development will provide a strong frontage to the Ben Dunne site and proposed public open space to the south. This will provide a good sense of enclosure to both the gym site and the proposed public open space.</p> <p>The routes through the site will all be overlooked by the proposed apartment blocks. This will ensure adequate passive surveillance is provided to the public realm.</p> <p>The heights and streets provide an appropriate street width to building height ratio at a human scale.</p>
<p>Objective 4: To provide well connected, high quality and active public and communal spaces Enhanced density and scale should:</p> <ul style="list-style-type: none"> • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and 	<p>The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport with a reduced car parking ratio provided primarily out of sight at undercroft level.</p>

<p>communal spaces, particularly to residential courtyards,</p> <ul style="list-style-type: none"> • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability. 	<p>The blocks have been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties.</p> <p>The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight.</p> <p>The wind microclimate study demonstrates that there will not be a negative wind impact resulting from the proposed development.</p> <p>The spaces and streets have all been designed to be people friendly and accessible.</p>
<p>Objective 5: To provide high quality, attractive and useable private spaces</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development. 	<p>There is a high quality of public, communal and private open spaces provided. All of these spaces are safe, accessible, and inviting.</p> <p>The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight.</p> <p>The wind microclimate study demonstrates that there will not be a negative wind impact resulting from the proposed development.</p> <p>The proposal has been designed to ensure passive surveillance is provided to the public spaces while also ensuring a high level of privacy is maintained for the proposed units.</p>
<p>Objective 6: To promote mix of use and diversity of activities</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, • contribute positively to the formation of a ‘sustainable urban neighbourhood’, • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle. 	<p>The subject site is zoned for residential development and there is an existing gym, GAA grounds, and vacant community building all within a short distance of the site. Therefore, it was not considered appropriate to provide mixed uses on the subject site.</p> <p>The proposed development will provide further residential units in this existing suburb which will support the range of facilities and amenities in the area and provide housing for people to live.</p> <p>The proposed mix of one and two bed apartment units will improve the housing supply quality in the</p>

	area and provide different options for people in an area dominated by semi-detached and terraced houses.
<p>Objective 7: To ensure high quality and environmentally sustainable buildings</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16), • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7. • include an assessment of embodied energy impacts – see Section 15.7.1 	<p>The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight. In addition, there is minimal impact on the neighbouring properties.</p> <p>The proposed apartment units can be altered internally as required by the future residents.</p> <p>The plant is provided at undercroft level, not roof level.</p> <p>52.9% of the proposed units are dual aspect.</p> <p>As shown in the Architect’s design statement, the proposal will be constructed with high quality materials.</p> <p>The proposed development includes solar PV panels at roof level.</p> <p>Please see the reports prepared by BMCE for information on the surface water management strategy and the flood risk.</p> <p>An Energy Analysis report has been prepared by IN2.</p>
<p>Objective 8: To secure sustainable density, intensity at locations of high accessibility</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the 	<p>The subject site is well connected to the wider area with high quality bus routes serving Kimmage Road West to the south.</p> <p>The layout has been designed to provide the optimum layout for access and parking while providing a high quality scheme that prioritises pedestrians and creates a human scaled place.</p>

most efficient ways possible integrated into the design.	
Objective 9: To protect historic environments from insensitive development Enhanced density and scale should: <ul style="list-style-type: none"> • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on key views and vistas related to the historic environment. 	<p>The site is not located within an Architectural Conservation Area and is not located in close proximity to a Protected Structure or National Monument.</p> <p>As shown in the Architects Design Statement and the photomontages, the site and its surrounding environment has the capacity to absorb the proposed development.</p>
Objective 10: To ensure appropriate management and maintenance Enhanced density and scale should <ul style="list-style-type: none"> • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc 	Please see the Operational Management Statement prepared by Lioncor.

Appendix 5 Transport and Mobility	
The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible.	<p>The proposal has been designed to ensure pedestrian permeability within the site.</p> <p>The proposal is located at the end of a cul-de-sac off Kimmage Road West. The boundaries to the north, west, and east consist of the existing boundary walls of the adjacent houses. Therefore, the opportunities for permeability through the site are limited.</p>
A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network.	A Quality Audit including a Cycle Audit and Walking Audit was completed by Bruton Consulting Engineers.
All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements.	Please see the auto track analysis prepared by BM Consulting Engineers.
All vehicular access shall be considered, including private car, service, delivery and emergency vehicles, in addition to applicable vehicular access requirements.	
Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network.	Set down and turning areas for service vehicles are all provided within the site,

All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.	Please see the DMURS Compliance Statement prepared by BM Consulting Engineers.
Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	Please see the Quality Audit prepared by Bruton Consulting Engineers.
Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/reduced provision of car parking to serve a development.	Due to the sites accessible location, the proposal includes a reduced quantum of car parking. Please see the Parking Provision Report and Residential Travel Plan prepared by BM Consulting Engineers.
The servicing requirements for any development should be established early in the preplanning process.	Please see the auto track analysis prepared by BM Consulting Engineers.
Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site	
For residential developments, details of access for service vehicles shall be considered at an early stage in the design process.	
Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated.	
Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.	Please see the Service and Delivery Access Strategy and auto track analysis drawings prepared by BM Consulting Engineers.
For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information: <ul style="list-style-type: none"> • Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles; • Confirm the number, type and frequency of service vehicles envisaged for the development and detail the locations from which servicing will occur and how it will be managed; • Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site. 	
Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time	A Parking Provision Report and Residential Plan has been prepared by BM Consulting Engineers.

Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements.	Car parking will not be sold with unit but will be assigned and managed separately.
A management scheme for any visitor car parking shall also put in place.	Please see the Car Park Management Strategy prepared by BM Consulting Engineers.
Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.	Please see the Yuko Toyota Car Club letter included within the Infrastructure Report.
The maximum standards for car parking provision are set out in Table 2.	Table 2 requires a maximum of 208 no. car parking spaces for the proposal (1 per unit). The proposed 100 no. car parking spaces is below this maximum in line with the development plan.
Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed).	Please see the Parking Provision Report and Residential Travel Plan prepared by BMCE Engineering for detail on the rationale for the car parking proposal.
Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council.	<p>The bicycle stores will fully and easily accessible. The Architect's Design Rationale includes details on the location and accessibility of the bike stores.</p> <p>All the bikes stores and spaces are provided at ground level and as such there are no staircases with wheel ramps proposed or required.</p>
Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated.	There are 180 no. bike spaces and 7 no. cargo bike spaces provided in Bike Store 4. These are provided in three sections which are each accessible through a separate door. This creates a natural and logical segregation of the bicycle storage.
All new developments are required to fully integrate cycle facilities into the design and operation of the schemes, in accordance with Table 1.	Table 1 requires 312 no. long term bike parking spaces (1 per bedroom) and 104

Cycle parking for residential apartment units shall be provided at a rate of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units. Relaxations of this standard may be considered in certain instances where the applicant can justify the proposed quantum having regard to location, quality of facilities, flexibility for future enhancement / enlargement and availability of alternative transport facilities.	no. short stay bike parking spaces (1 per 2 apartments). The proposal includes 352 no. long term bike parking spaces and 132 no. short term bike parking spaces which exceeds the minimum standards.
Secure bicycle parking stands shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such cycle stands shall be within 25 m of a destination for short-term parking (shops) and within 50 m for long-term parking (school, college, office). All long-term (more than three hours) cycle stands shall be protected from the weather. Cyclists shall be able to secure both frame and wheels to the cycle parking stand.	The cycle parking is provided at undercroft level (under Blocks 1, 2, and 3) and in a bike store located to the east of Block 4 and 5. This ensures that all long term bike spaces are located within a short distance from the entrances to the apartment blocks.
All on-street cycle stands shall be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism	The on-street short term bike parking are all provided as Sheffield stands.
Off-street storage/parking facilities shall provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision	The secure long term bike parking spaces will be easily accessible and will be lit appropriately to ensure a strong sense of safety and security.
Where high density cycle parking is provided in a secure location, stacked/tiered cycle parking may be acceptable provided it is easily used and secure.	The bike store includes double-stacked bike parking which will be easily accessible.
Planning applications shall clearly demonstrate cycle parking capacity and user accessibility	Bike parking details are clearly outlined in the architects drawings.
A departure from the standards set out in Table 1 may be acceptable in limited circumstances on a case by case basis at the discretion of Dublin City Council. The applicant must fully engage with Dublin City Council at pre-application stage to ascertain any deviations from the above standards	The proposal exceeds the standards set out in the Table 1.
Table 2 specifies the requisite level of on-site parking to be provided for residents, staff and visitors for various types of development. These car parking standards shall be generally regarded as the maximum parking provision	The subject site is located in parking zone 2. Table 2 requires a maximum of 208 no. car parking spaces for the proposal (1 per unit).
A relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location	The proposal includes 100 no. car parking spaces, including 12 EV charging spaces and 6 no. universal access spaces. This car parking provision is considered appropriate for this highly accessible location.
Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria: • Locational suitability and advantages of the site.	The subject site is highly accessible and is located within the existing built up area of Kimmage with a range of facilities within a short distance.

<ul style="list-style-type: none"> • Proximity to High Frequency Public Transport services (10 minutes' walk). • Walking and cycling accessibility/permeability and any improvement to same. • The range of services and sources of employment available within walking distance of the development. • Availability of shared mobility. • Impact on the amenities of surrounding properties or areas including overspill parking. • Impact on traffic safety including obstruction of other road users. • Robustness of Mobility Management Plan to support the development. 	<p>Dublin Bus Routes 9, 15a, and 17 serve the bus stops along Kimmage Road West to the south of the site. These operate every 10, 15 and 20 minutes respectively.</p> <p>Access is provided from the site to Kimmage Road West which connects with the surrounding area.</p> <p>The KCR Industrial Estate and Cashel/Stanway Drive Estate are located a c. 11 minute and 17-minute walk from the site. These provide a range of employment opportunities within a short distance from the site.</p> <p>A Quality Audit has been completed by Bruton Consulting Engineers.</p>
At least 5% car parking spaces shall be designated accessible car parking spaces.	6% of the car parking spaces are provided as accessible spaces.
Proposals should indicate how the design aims to control surface water runoff in a sustainable fashion through the use of permeable or porous surfaces such as gravel and green areas etc. rather than excessive hard surfacing	The proposal incorporates SUDs features including green roofs and permeable paving.
In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications	The proposal includes 12 no. EV charging spaces. Additional EV spaces can also be provided.
New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided. Motorcycle parking areas shall have limited gradients to enable easy manoeuvrability and parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.	The proposal includes 6 no. motorcycle spaces which is 6% the car parking spaces provided.
All car club spaces shall be fully equipped with EV infrastructure	The car club spaces are fully equipped with EV infrastructure.
All roads and footpaths within developments shall be constructed to Taking-in-Charge standards	All roads and footpaths will be constructed to taking-in-charge standards.
Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application	None of the site is proposed to be taken in charge.

Appendix 5 Table 1 Bicycle Parking Standards for Various Land Uses		
Land Use	Long Term	Short Stay
Sheltered Housing	1 per 5 residents	1 per 10 residents
Residential Apartment	1 per bedroom	1 per 2 apartments
Residential Dwelling	1 per unit	1 per 5 dwellings
Creche	1 per 5 staff	1 per 10 children

These standards are met in full.

Appendix 5 Table 2 Maximum Car Parking Standards for Various Land Uses			
Land Use	Zone 1	Zone 2	Zone 3
Sheltered Housing	1 per 4 dwellings	1 per 2 dwellings	1 per 2 dwellings
Houses, Apartments/Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling
Creche	1 per 100sqm GFA	1 per 100sqm GFA	1 per 100sqm GFA

These standards are met in full

Appendix 7 Waste Storage	
Waste storage issues should be considered at the initial design and pre planning stage of all residential developments to ensure access for all (including people with disabilities), in a brightly lit, safe and well-signed area, spacious enough for easy manoeuvrability, with good ventilation and ready access if required for the control of potential vermin.	Dedicated bin stores are provided at undercroft level for Blocks 1, 2 and 3. A standalone store along the eastern boundary is provided for Blocks 4 and 5.
Provision shall also be made for the storage and collection of waste materials in apartment schemes in accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018.	An Operational Waste and Recycling Management Plan has been prepared by Traynor Environmental.
Requirements for residential developments: <ul style="list-style-type: none"> • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of non-reusable receptacles such as bags, ideally of 1,100 litre capacity, must be used • To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general waste, dry recyclables and organic food/garden waste. • Sufficient space must be provided to accommodate the collection of dry recyclables and organic kitchen waste/garden waste. • Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes. 	Please see the detail in the Operational Waste and Recycling Management Plan prepared by Traynor Environmental.

Appendix 11 Green and Blue Roof Guide	
All development types are considered appropriate for green blue roof application	The proposed development includes blue and green roofs.

Planning applications which include roof areas of greater than 100 sq. m. with flat and gently sloped roofs are considered appropriate for green blue roof application								
<div>The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area</div> <table><tr><td>Type</td><td>Minimum Coverage (% of total roof area being developed)</td></tr><tr><td>Extensive</td><td>60%</td></tr><tr><td>Intensive</td><td>50%</td></tr></table>		Type	Minimum Coverage (% of total roof area being developed)	Extensive	60%	Intensive	50%	The proposal includes 50% intensive green roofs and 70% extensive green roofs. Please see the Infrastructure Report for further details.
Type	Minimum Coverage (% of total roof area being developed)							
Extensive	60%							
Intensive	50%							
Roof areas that are not considered for green roof due to the presence of solar panels should still be considered for blue roof.		Solar PV panels are included on the roof. The remainder of the roofs are blue and green roofs.						
The design of the green blue roof should maximise biodiversity and/ or amenity benefits.		The green roofs will support planting which will increase biodiversity on the site.						
Green blue roof designs should be designed to ensure that any amenity use (e.g. use as communal open space) can be facilitated without effecting storage capacity or drainage function of the green blue roof								

Appendix 12 SuDS	
SuDS designs will explore opportunities for: sustainable reuse of rainfall (see policy SI6); recharge of aquifers; interception and evapotranspiration of surface water; and, direct discharge to open channel watercourses, thus reducing the pressure on the piped drainage network.	The proposal incorporates SuDS features including green roofs and permeable paving.
SuDS structures should be integrated into the fabric of a development using the available landscape spaces as well as the construction profile of buildings. Consideration of existing site topography, landscape resources and how the site is used is vital in determining the most appropriate SuDS measures in a scheme	The proposed SuDS features are integrated into the layout and landscaping.
Areas that store surface water during regular rainfall events, except ponds or wetlands, shall not normally be included in the calculation of open space provision.	SuDS features are not included as part of the open space provision.
However, where SuDS proposals enhance biodiversity and amenity value and would be readily available for use in most weather conditions, a portion of the SuDS area could be incorporated as part of the communal or public open space provision	An attenuation tank is included on site for storm events.
The proportion of SuDS which would be allowable as part the public open space allocation would be decided on a case-by-case basis by the planning authority. The following points will be considered in determining the areal extent of SuDS which serve as multifunctional space and/ or contribute to the public open space allocation:	The proposal includes high quality open spaces that are not negatively impacted by the inclusion of attenuation tanks or SuDS features.

<ul style="list-style-type: none"> • That sufficient open space remains available (except in response to extreme rainfall events) to allow for passive and active recreation including organised sport, informal play or active recreational use. • How often a particular feature would hold surface water. • The duration that feature would hold surface water. • Period between rainfall ending and the area being available for use. • Whether the SuDS features could be deemed to be providing an open space benefit even when holding surface water (for example, ponds and wetlands). 	
<p>The following methods of utilising or releasing rainfall run-off from development are set out in order of preference:</p> <ol style="list-style-type: none"> Use surface water run-off as a resource. Provide interception of rainfall through the use of nature based SuDS approaches. Where appropriate, infiltrate run-off into the ground. Discharge to an open surface water drainage system. Discharge to a piped surface water drainage system. Discharge to a combined sewer. <p>Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.</p>	<p>The proposal includes green roofs and permeable paving as interception storage.</p> <p>Run-off from the site will discharge into receiving waters through traditional pipe networks.</p> <p>Rainfall run-off from the proposed site development will go through at least a two-stage treatment train prior to discharge into the public system.</p>
<p>Surface run-off from new development will be restricted to 2 l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep⁶¹) where surface water leaving the site:</p> <ul style="list-style-type: none"> • poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse); • has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event). 	<p>The proposed development will limit discharge rate to 2.47l/s (QBAR) in line with GSDS requirements.</p>
Table 1 outlines SuDS Requirements	The proposal is in line with SuDS requirements.
<p>The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.</p>	<p>BMCE documents demonstrate their acceptability and suitability for this site in line with SUDS.</p>
<p>Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.</p>	
<p>Designs should seek to generate biodiversity benefits using SuDS.</p>	

Appendix 13 Surface Water Management	
Dublin City Council (DCC) will require a softer engineered or nature based approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing surface water on development lands	The proposal incorporates SuDS features including green roofs and permeable paving.
Development proposals must be accompanied by a Surface Water Management Plan (SWMP) which sets out the proposed strategy for managing surface water.	The Surface Water Management Plan is included within the Infrastructure Report and drawings prepared by BM Consulting Engineers which demonstrate how the proposed surface water management strategy is in line with the current and draft development plan and DCC guidelines.
The objective of producing a SWMP is for the developer/project proposer to consider all the opportunities and constraints in developing a design solution that will manage surface water in a way that utilises and mimics natural processes, whilst protecting and enhancing the built and natural environment.	
<p>The SWMP prepared for submission to the planning authority as part of a planning application shall include the following:</p> <ul style="list-style-type: none"> • Site location map with proposed planning boundary indicated in red • Overall surface water drainage layout indicating: <ul style="list-style-type: none"> • Existing public surface water infrastructure • Proposed connection points to existing public sewers • Spine sewers (if any) • Detail of any surface water sewer extension, diversions, surface water sewer upgrades etc. to be clearly indicated • Report detailing existing site conditions including: <ul style="list-style-type: none"> • Topography • Ground conditions • Land drain features • Overland flow paths • Floodplains • Utilities • Detail of proposed surface water management strategy shall include: <ul style="list-style-type: none"> • Longitudinal section details of proposed surface water pipe runs if required indicating route, levels, pipe size, gradient etc. A well designed SuDS scheme will reduce or even eliminate the need for significant piped drainage • Identify proposed location to discharge to stream or public drainage system • Identification of appropriate SuDS features to meet the key criteria of the GDSDS and reference in Section 16.3 of the Greater Dublin Regional Code of Practice for Drainage Works - source control and interception storage provided and volumes defined – no run-off from site for events up to 5mm. See also the Council's 	The drawings and reports prepared by BM Consulting Engineers provide all this detail required for the Surface Water Management Plan.

<p>Sustainable Drainage Design and Evaluation Guide (2021) and Appendix 12</p> <ul style="list-style-type: none"> • Provide a clear explanation of the SuDS proposals proposed for each hardstanding area including defined control structures and sizes of same • Discharge rate applied • Attenuation storage provided and volumes defined – storage for 1% and 3.3% annual probability with factor in accordance with the SFRA for climate change shall be applied. A figure of 20% will be applicable in most cases • Exceedance and overland flow routes • Phased development – where development under a planning application/permission is phased, coordination of the overall surface water management strategy shall be implemented at the first phase in order to ensure the overall integrated design is implemented. This would allow different parts of a site to be developed at different times, while ensuring that the final developed site shall meet the overall design criteria as set out in this Appendix • Identify green space and public space locations including any that are designed to be multifunctional – integrating SuDS (see also Section 15.6 – Green Infrastructure and Landscaping) • Details of any proposed wayleaves or land transfers in relation to surface water drainage. • An undertaking that SuDS will be completed to taking in charge standards (in accordance with policy SI26) 	
<p>Discharge managed via a pipe and an attenuation tank system will only be considered by the planning authority in exceptional circumstances and on a case-by-case basis</p>	<p>The proposal includes an attenuation tank as shown in the permitted SHD scheme on site. This was designed in accordance with DCC's recommendations during the SHD application process.</p>

Appendix 16 Sunlight and Daylight	
<p>Performance of Proposed Development</p> <ul style="list-style-type: none"> • Annual Probable Sunlight Hours on all relevant windows • Winter Sunlight Hours on all relevant windows • Sunlight on Ground in all amenity spaces • Average Daylight Factor in all habitable rooms • No Sky Line in all habitable rooms • Target Illuminance in all habitable rooms 	<p>IN2 have prepared a Daylight Sunlight Assessment which assesses the proposed development under each of these criteria. The report confirms that the development is acceptable in line with this guidance and the latest BRE 2022 documents</p>
<p>Impact on Surrounding Properties</p> <ul style="list-style-type: none"> • Vertical Sky Component on all relevant surrounding windows • Annual Probable Sunlight Hours on all relevant surrounding windows • Winter Sunlight Hours on all surrounding windows 	<p>The Daylight Assessment prepared by IN2 assesses the impact of the proposal on the VSC, APSH, WSH, and SOG of the neighbouring properties.</p>

<ul style="list-style-type: none"> • Sunlight on Ground in all surrounding amenity spaces 	
When assessing the impact of a proposed development, it is expected that all surrounding properties are assessed. It is not acceptable to assess only the surrounding residential properties. Residential properties should be clearly marked out and results for these presented separately	All adjacent properties have been assessed.
When assessing the impact of a proposed development on the existing surrounding properties, it is expected that the rule within clause 2.2.4 of BR 209 is applied. This rule outlines that “Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window”. Thus, all surrounding buildings that sit within three times the height of the proposed development shall be included within the assessment. The assessment can then use methods typically applied in BR 209 to determine the correct approach to investigating loss of light.	All existing buildings within three times the height of the proposed development are included in the assessment.
When analysing the results found to investigate the impact of a proposed development on the surrounding existing buildings, it is expected that the nomenclature and associated descriptions from within Appendix I of BR 209 are used. The wordings of negligible, minor adverse, moderate adverse and major adverse have defined meanings. These meanings have associated descriptors, and these shall be applied during the analytics section of reports. Appendix I in BR 209 provides these descriptions in full.	The Daylight Sunlight Assessment uses all terminology in line with the BR guidance.
The use of average daylight factor in assessing the impact of a new development on surrounding existing developments is not permitted.	The average daylight factor has not been used in the assessment of the surrounding existing developments.
Where alternate target values are being set, this shall be completed in line with Appendix F of BR 209	The daylight report clearly outlines what target values have been set.
When analysing the performance of a proposed development, it is expected that all rooms with an expectation for daylight are assessed. Assessing only a sample of rooms is not permitted.	All rooms within the proposed development have been assessed.
When determining input factors for simulations, the criteria below shall be applied, applicants shall clearly state their assumptions.	The assumptions are clearly stated in IN2’s report.

Conclusion

This chapter has demonstrated the compliance of the proposed development with national, regional and local planning policy, including both the current and draft Development Plans.

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

CHAPTER 8 CONCLUSION

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

This LRD has the same layout, building height, car parking, unit mix and numbers, and open space provision as the previously permitted SHD Development by ABP under Reg Ref ABP-313043. It is noted that this permitted development was also supported by Dublin City Council as set out in the Chief Executives report submitted to ABP for the SHD. The proposed layout and overall LRD scheme are the same as the permitted SHD on the site. The key changes are that the scheme will now provide for social and affordable housing managed by Co-operative Housing Ireland. The only physical change is to the internal layout which replaces ensembles previously included in the 96 no. of the 104 no. two bed units with walk-in-wardrobes. The remaining 8 no. two bed units remain as permitted.

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

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Project Ireland 2040: National Development Plan (2018-2027)*
- *Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)*
- *Housing for All – A New Housing Plan for Ireland (2021)*
- *Delivering Homes, Sustaining Communities (2007) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *Climate Action Plan (2019);*
- *Climate Action Plan (2021);*
- *Regional, Spatial and Economic Strategy 2019-2031;*
- *Transport Plan for the Greater Dublin Area 2016-2035;*
- *Draft Transport Strategy for the Greater Dublin Area 2022-2042.*
- *Urban Development & Building Heights: Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing: Design Standards for New Apartments (2020)*
- *Childcare Facilities Guidelines for Planning Authorities (2001)*
- *Urban Design Manual: A Best Practice Guide (2009)*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*
- *The Planning System and Flood Risk Management (2009)*
- *Design Manual for Urban Roads and Streets (2019)*
- *Dublin City Development Plan 2016-2022*
- *Draft Dublin City Council Development Plan 2022-2028 (now adopted but the completed adopted plan is not available at the time of writing)*

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

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