

Planning Report

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT
“Carlisle”, Kimmage Road West, DUBLIN 12

PREPARED BY MCG PLANNING
ON BEHALF OF 1 TERENCE LAND LIMITED
May 2025

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1. Introduction

On behalf of the applicant 1 Terenure Land Limited, 27 Merrion Square, Dublin 2, this planning report accompanies an LRD 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 (“the Proposed Development”) at the site of “Carlisle”, Kimmage Road West, Dublin 12. This is in accordance with the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.

The application has been prepared by a multidisciplinary team on behalf of 1 Terenure Land Limited as set out in the table below:

Company Name	Documents/ Drawings Prepared
BKD Architects	Complete set of drawings
	Schedule of accommodation
	Housing Quality Assessment
	Architectural Design Statement
	Building Life Cycle Report
	Community Safety Strategy
	Response to LRD Opinion
Barrett Mahony Consulting Engineers	Complete set of civil and road drawings
	Infrastructure Report
	Site Specific Flood Risk Assessment
	DMURS Compliance Statement
	Outline Resource and Waste Management Plan
	Outline CSWMP
	Outline Car Park Management Strategy
NMP Landscape Architects	Parking Report and Residential Travel Plan
	Full set of landscape drawings
Altemar Ecologists	Landscape Design Statement
	AA Screening
	Ecological Impact Assessment
Arbeco	Biodiversity Enhancement Plan
	Complete set of survey and impact/ protection drawings
IN2	Arboricultural Assessment
	Daylight, sunlight and overshadowing Assessment
	Energy Analysis Report
	Wind Analysis and Pedestrian Comfort Report
Turleys	Public Lighting Drawing
	Childcare Assessment
	Cultural Infrastructure Impact Assessment
Transport Insights	Social Infrastructure Audit
	Public Transport Capacity Study
Visual Labs	Verified views
ModelWorks	Townscape and Visual Impact Assessment
Traynor Environmental	Noise Impact Assessment
	Operational Waste Management Plan

The report is divided into eight sections:

- Section 2 describes the site location and context.
- Section 3 details the planning history for the subject site
- Section 4 outlines details of the proposed development and rationale
- Section 5 sets out the details of the Pre-Planning meeting
- Section 6 details our response to the LRD Opinion
- Section 7 assesses the proposed development against national, regional and local planning policy as per the list below:
 - Project Ireland 2040 - National Planning Framework (2018) (“**NPF**”);
 - National Planning Framework First Revision (2025) (“**NPFFR**”);
 - Climate Action Plan (2025) (“**CAP 2025**”);
 - Transport Strategy for the Greater Dublin Area 2016 – 2035 (“**TSGDA**”);
 - Greater Dublin Area Transport Strategy 2022-2042 (“**GDATS**”);
 - Childcare Facilities Guidelines for Planning Authorities 2001 (“**CFG**”);
 - Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 (“**QHSC**”);
 - Regional Spatial and Economic Strategy 2019- 2031 (“**RSES**”);
 - Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (“**Compact Settlement Guidelines**”);
 - Urban Design Manual: A Best Practice Guide 2009 (“**UDM**”)
 - Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023) (“**Apartment Guidelines**”);
 - Design Manual for Urban Roads and Streets (2013) (“**DMURS**”);
 - The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (“**Planning System and Flood Risk Guidelines 2009**”);
 - Guidelines for Planning Authorities on Urban Development and Building Heights (2018) (“**Building Height Guidelines**”);
 - Dublin City Development Plan 2022-2028 (“**DCDP**”)
- Section 8 concludes the report.

Development statistics

The proposed development is described in the public notices as per the below:

We, 1 Terenure Land Limited, intend to apply for Planning Permission for a Large-Scale Residential Development (LRD) at this site at “Carlisle”, Kimmage Road West, DUBLIN 12, in the Electoral Division of Kimmage E. The site is located to the south of Captain’s Road, west of Brookfield Green, east of Park Crescent, north and east of Carlisle Health and Fitness Centre / BD Gym (D12 X379) and north of the Nora Dunne Gallery (D12 RP02).

The proposal will consist of a residential development (c.14,437 sqm GFA) providing 145 no. Apartments (70 no. 1 beds and 75 no. 2 beds) within 5 no. blocks ranging in height up to 5 storeys. Blocks 4 and 5 are conjoined. A detailed breakdown of each block is as follows:

- **Block 1 ranges in height from 3 to 4 storeys and provides 30 no. residential units**
- **Block 2 ranges in height from 3 to 5 storeys and provides 38 no. residential units**
- **Block 3 ranges in height from 3 to 5 storeys and provides 37 no. residential units**

- **Block 4 ranges in height from 3 to 4 storeys and provides 22 no. residential units**
- **Block 5 ranges in height from 3 to 4 storeys and provides 18 no. residential units**

All residential units will be provided with associated private open spaces, in the form of balconies and terraces, to the north/ south/ east/ west.

A creche (c.210 sqm plus external space of c.130 sqm) and community culture and arts space (c.813 sqm) are proposed within Blocks 4 and 5.

Vehicular/ pedestrian/ cyclist accesses will be provided from Kimmage Road West, via the existing access route to Carlisle Health and Fitness Centre / BD Gym. This road will be extended into the site.

The proposal will include 89 no. car parking spaces, 465 no. cycle parking spaces and 6 no. motorcycle parking spaces at surface and undercroft level (located under Blocks 1, 2 and 3), public and communal open spaces, roof gardens, landscaping, boundary treatments, plant areas, waste management areas, and services provision (including ESB substations) and all associated works required to enable this development. The development will also include upgrades by Uisce Eireann to the network along Kimmage Road West.

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

Development Proposal	Site Statistics
No. of Units	145
Unit Breakdown	70 no. 1 bed apartments 75 no. 2 bed apartments
No. of Blocks	5 no. blocks (with blocks 4 and 5 linked)
Site Area	Net: 1.25ha Gross: 1.9 (including Uisce Eireann upgrades)
Net Density	116uph
Site Coverage	43.1%
Plot ratio	1.2:1
Building Height	Up to 5 storeys
Aspect	86 no. dual aspect units (57.3%)
Open Space	1,261sqm public open space (1,250sqm required) 1,860qm communal open space (910sqm required)
Community/Cultural space	813sqm (722sqm required)
Creche	210sqm (20 spaces) + 130sqm of outdoor space.
Car Parking	89 no. spaces <ul style="list-style-type: none"> - 83 Residents (0.57 spaces per unit) - 2 Community/ cultural parking - 4 Creche car parking spaces Of the 89 spaces there are <ul style="list-style-type: none"> - 42 E.V charging spaces - 7 no. universal access spaces (5no. residential, 1 no. creche, and 1 no. community/arts space)
Cycle Parking	465 no. spaces (350 required) <ul style="list-style-type: none"> - 316 no. residential (incl. 16 no. cargo bike spaces) - 132 no. visitor (incl.12 no. cargo bike spaces) - 12 no. spaces for the Community/ cultural space (including 2 no cargo) - 5 no. spaces for the creche.
Motorcycle Parking	6 no. spaces

2. Site Description 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. There are existing high frequency bus routes within 300m of the site which run every 10 minutes which includes the number 9 bus route. 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	Peak frequency	Key Locations
9	Charlestown Shopping Centre – Greenhills College	12-15 min	10 mins	DCU City Centre Trinity College
15a	Greenhills College – Ringsend Road	20 min	15 mins	Swan Centre City Centre Grand Canal Dock
S4	Liffey Valley – Ballyfermot – Crumlin – Milltown – UCD	10 minutes	10 mins	Liffey Valley – Ballyfermot – Crumlin – Milltown – UCD
54A	Marlfield – College Street	30 min	20-30 mins	Tallaght Hospital City Centre
74	Dundrum – Whitechurch – Crumlin – City Centre	30 mins	30 mins	Dundrum – City Centre
83/83A	Stannaway Ave – Charlestown Sc	12-15 mins	10 mins	City Centre Trinity College

Table 1 Bus Routes serving the subject site

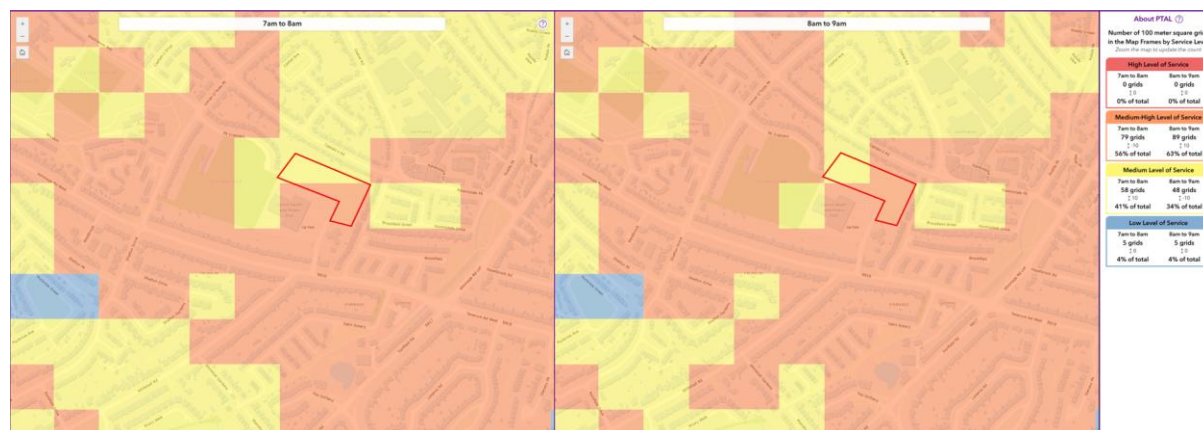


Figure 2 NTA PTAL Map indicating Medium to High Level of Service for the majority of the site. The residential building section of the site is indicatively outlined in red.



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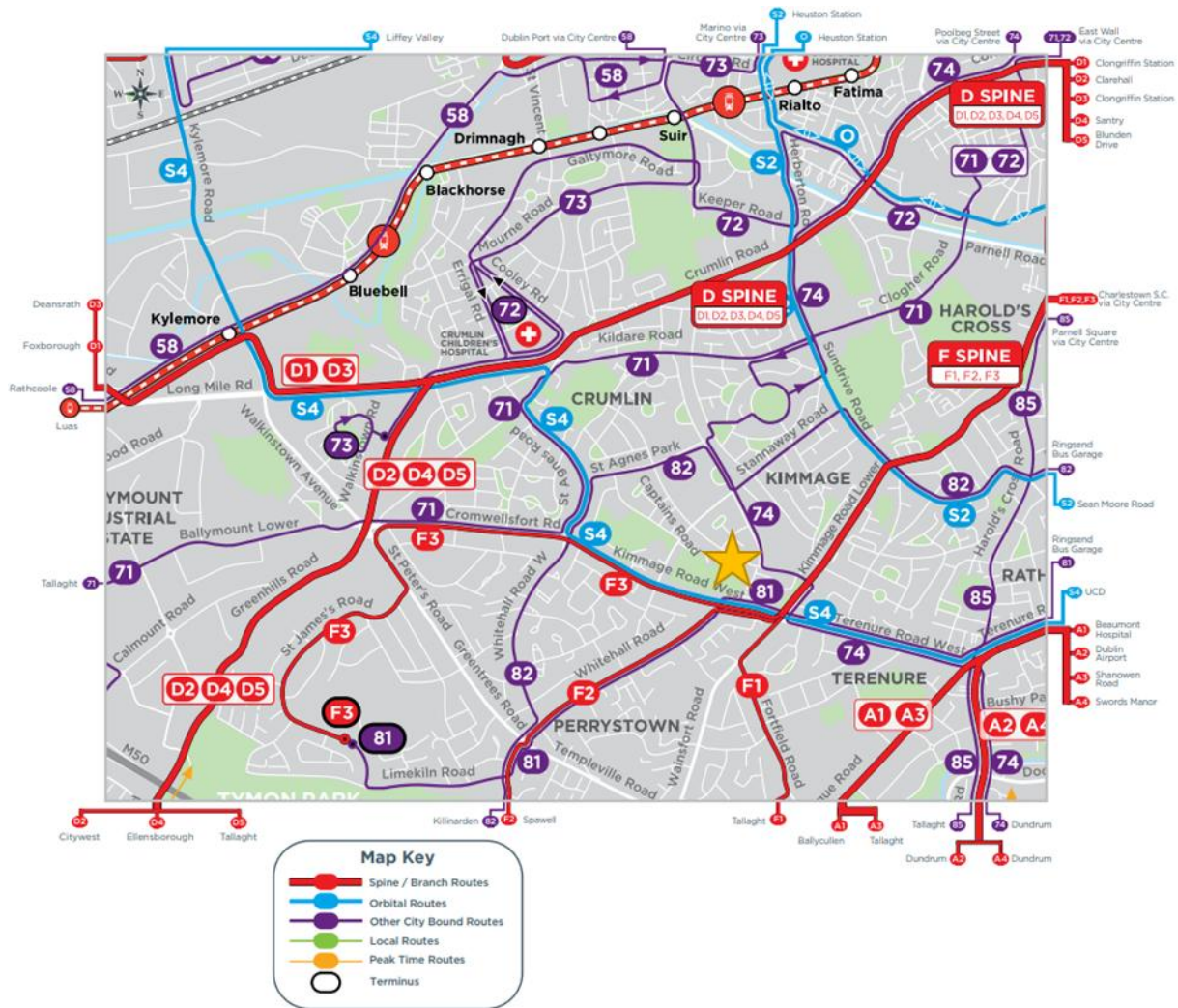


Figure 4 Bus Connects Crumlin area map (Source Bus Connects). Subject site indicated by yellow star.

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.

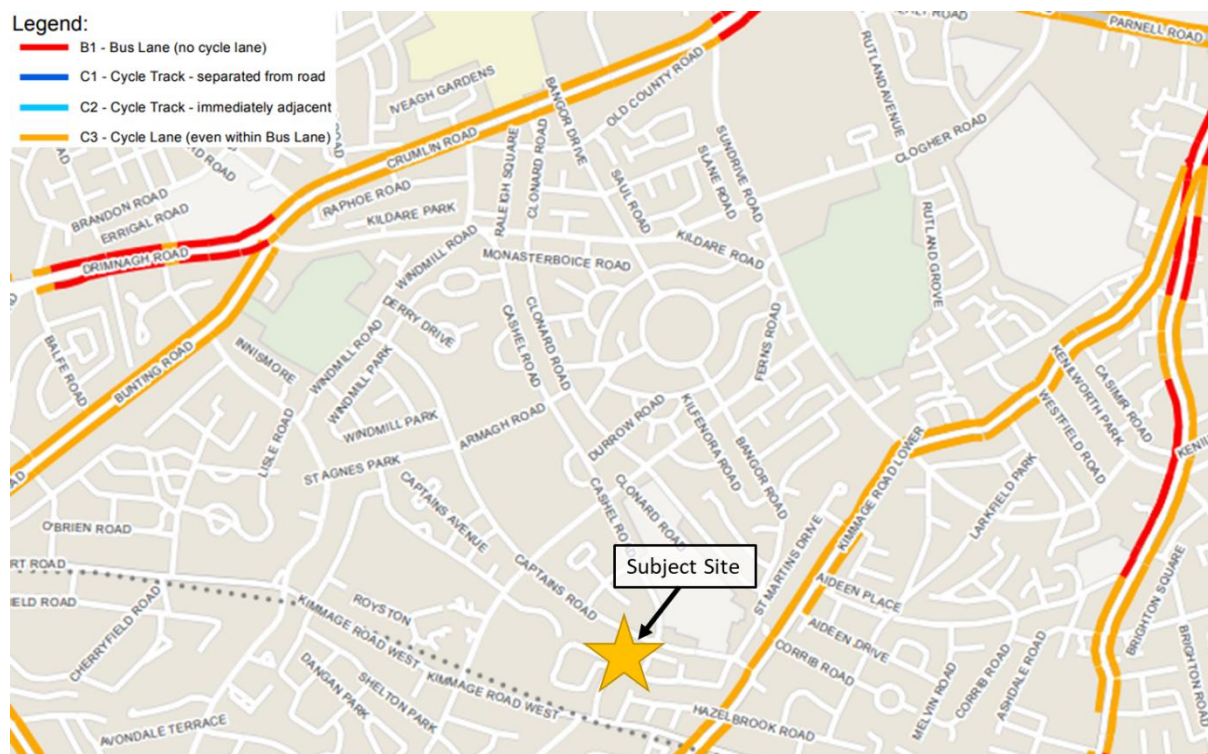


Figure 5 Existing cycle facility types surrounding subject site (Source NTA)

Retail and Employment

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 2 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/Stanway 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/ Stanway 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 3 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 4 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.

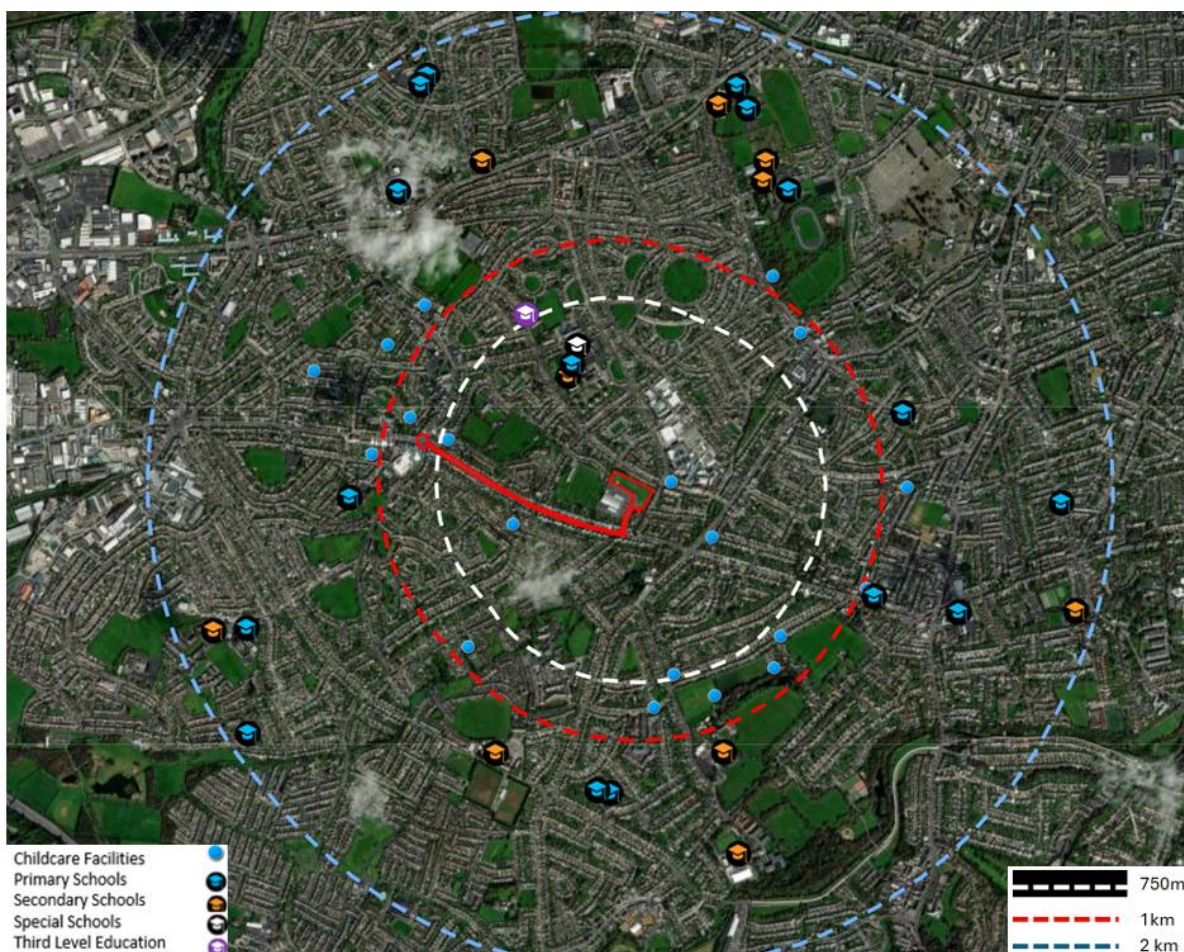


Figure 6 Locations of educational facilities within vicinity

Education Facilities within 1km from subject site	
Primary Schools	Walk Time from Site
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 5 Education Facilities within 1km from subject site

As set out in the childcare assessment submitted by Turley with this application, there are c. 8 no. childcare facilities operating within 1km of the subject site. Notwithstanding this, a childcare facility is also proposed as part of the application and, therefore, complies with planning policy at all levels.

3. Planning History

McGill Planning have carried out a desktop review of the planning history of the site. Several applications have been made on this site. The two most recent are the most pertinent and are discussed further below.

Previously approved planning applications on site are listed below:

DCC Reg. Ref:	2963/07
Decision:	Granted Permission with conditions
Description:	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
Decision:	Granted Permission with conditions
Description:	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
Decision:	Granted Permission with conditions
Description:	ABP granted permission with conditions for a Strategic Housing Development (SHD) at Carlisle, Kimmage, Dublin 12 on the 22 nd of September 2022. The development included 208 no. residential units within 5 blocks (with blocks 4 and 5 linked throughout) rising in height up to 6 storeys.
Judicial Review	This was subsequently quashed at Judicial Review.

DCC Reg. Ref:	LRD6018/22-S3
ABP Reg. Ref:	ABP316176-23
Decision:	Granted Permission with conditions
Description:	DCC and ABP granted permission with conditions for a Large scale Residential Development in 2023 at the subject site, Carlisle, Kimmage, Dublin 12. The development included 208 no. residential units within 5 blocks (with blocks 4 and 5 linked throughout) rising in height up to 6 storeys.
Judicial Review	There is an ongoing Judicial Review on this permission.

Proposed Development compared to the two more recently permitted developments.

Development Proposal	Site Statistics of Previous Application 313043-21	Site Statistics of Previous LRD Application 6018/22-S3, ABP 316176-23	Site Statistics of Proposed LRD 2025
No. of Units	208	208	145
Unit Breakdown	104 no. 1 bed 104 no. 2 bed	104 no. 1 bed 104 no. 2 bed	70 no. 1 bed 75 no. 2 bed
Community / cultural facilities	N/A	N/A	813sqm of Community/Cultural space 210sqm internal creche space with a 130sqm outdoor associated garden
No. of Blocks	5 (blocks 4 & 5 linked throughout)	5 (blocks 4 & 5 linked throughout)	5 (blocks 4 & 5 linked throughout)
Site Area	Nett site area: 1.25ha	Nett site area: 1.25ha	Nett site area: 1.25 ha
Net Density	166.4 units/ha	166.4 units/ha	116 units/ha
Site Coverage	43.1%	43.1%	43.1%
Plot ratio	1.64:1	1.64:1	1.2:1
Building Height	Up to 6 storeys	Up to 6 storeys	Up to 5 storeys
Multiple Aspect	52.9%	52.9%	57.3%
Open Space	Public open space: 1261 sq.m Communal open space: 1619 sq.m	Public open space: 1261 sq.m Communal open space: 1619 sq.m	Public open space: 1261 sq.m Communal open space: 1,896sq.m
Car Parking	100 spaces	100 spaces	89 spaces
Cycle Parking	484 spaces	484 spaces	465 spaces
Motorcycle Parking	6 spaces	6 spaces	6 spaces

This proposed development is similar to the two previously permitted developments as approved by both Dublin City Council and An Bord Pleanála with the following key changes:

- Reduced building heights by one storey, to 5 storeys
- Alterations to the massing and stepping of the buildings, with buildings stepping from 3 to 5 storeys

- Reduction in the number of residential units by 63 units.
- Introduction of community/ cultural space and a creche at the ground floor of block 4/5.

It is noted that both DCC and ABP have already permitted proposed development at this site where the proposals involved more units and higher buildings. The analysis provided by the Inspector and DCC Chief Executives Report on the SHD is set out below and is still considered relevant.

Previous SHD Application ABP 313043-21

DCC submitted a 'Chief Executive's Report' to ABP on the first application, ABP 313043-21, 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 (ABP 313043-21). 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 2016-2022 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."*

An Bord Pleanála's Previous SHD Report ABP 313043-21

Similarly, An Bord Pleanála viewed the proposed SHD development of 208 units positively under Reg. Ref. ABP313043. 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 gives clear direction with regards to issues raised within the development. These are reviewed under subheadings in detail below:

The inspector was *"satisfied that the development is in accordance with the Z1 zoning objective."*

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."*

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."

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."

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.”

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”.

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.”

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.”

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”.

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”.

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”.

Previous LRD Application LRD 6018/22-S3 and ABP 316176-23

Dublin City Council adjudicated on the application LRD6018/22-S3, granting permission for the development. This was subsequently appealed to An Bord Pleanála who also granted permission for the development.

The DCC Planners Report confirmed that: “The redevelopment of this vacant site 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, with existing services and amenities in the Kimmage and Crumlin area and which is a short walk from Stannaway Park.”

The planners report states: *“It is considered that the site is suitable for high density development given the location adjacent to a number of bus routes. It is considered that the delivery of residential development on this prime, underutilised, serviced site, in a compact form with higher density, would be consistent with policies and intended outcomes of current Government policy, specifically the NPF, the RSES and the Apartment Guidelines, which all look to secure more compact and sustainable urban development in the Dublin Metropolitan Area.”*

With regard to the architectural approach the Planners report found that *“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.”*

Height was also considered in detail in the planning report. They assessed the development block by block against the criteria set out in the Development Plan. Having completed this assessment the local authority found that: *“Overall, it is considered that the proposed development with heights varying from 3 to 6 storeys is acceptable at this location. The applicant has made a case for the increased height based on the Performance Criteria set out in Appendix 3 of the Development Plan. In addition, it is considered that the applicant has made a robust case for the additional height with particular reference to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and the relevant sections of the Performance Criteria. The Planning Authority also accepts that permission has been granted for an identical development with heights varying from 3-6 storeys and the Planning Authority raised no issues with the heights during the SHD process.”*

With regard to impact on adjacent neighbours in terms of daylight and sunlight the Planners report states: *“It is noted that the proposed development will have a minor adverse effect on the daylight/sunlight provision to two of the properties studied. It is considered that the minor adverse effect is not significant and given the need to achieve wider planning objectives such as the securing of comprehensive urban regeneration it is considered acceptable. The Planning Authority notes that permission has been granted under ABP-313043-22 and that the Inspector did not raise concerns regarding Daylight/Sunlight within their assessment.”*

The report concludes that *“The proposed 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 Planning Authority notes that under ABP313043-22, permission has been granted for similar development in terms of quantum of development, density, height, mix of units, parking and open space. The key changes under the application include a 100% social and affordable development to be managed by an established Housing Body and some minor changes to the layout of the two bedroom units. In this regard, the Planning Authority is supportive of the proposed changes and notes that the changes are minor and will not result in any further any {report typo and assumed to be “impact”} to residential amenities of neighbouring properties to that granted under ABP313043-22.*

The heights and quantum of development are considered to be appropriate at this location within an established residential area of Kimmage.”

An Bord Pleanála Inspector’s Report on the Appeal of the LRD 6018/22-S3 (ABP 316176-23)

The Inspector on the Appeal confirmed that *“I have no objection to the proposed scheme in terms of development on these suitably zoned lands for residential use and I also consider that the type of housing proposed is also acceptable.”*

The Report also confirms that *“Whilst the standard density range is stated in Table 1 to be 60 – 120 units in the outer suburbs, increased densities are acceptable and are assessed against Table 3 of the Dublin City Development Plan. I am satisfied that the proposed development demonstrates how it will comply with the requirements of this table and the site is therefore suitable for a development with a density in excess of 120 units per hectare.*

I am satisfied that the site is suitable for the density of development that is proposed here. The area is served by a range of shops and community facilities that can be reached by walking. Public transport provision is acceptable for the scale and type of development that is proposed in this location.”

The Inspector also addresses impact on Existing Residential Amenity, and addresses the concerns raised by the Appellants. Having assessed the proposal against overlooking, daylight and sunlight, the Inspector found that *“Overall I am satisfied that the development will not have a 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, including public transport. 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.”*

The Inspector confirmed that in terms of traffic and access *“The location is served by a frequent bus service and as per the ‘Public Transport Capacity Study’ prepared by Transport Insights in support of the appeal response, the existing bus service has adequate capacity to serve the demand generated by this development. Adequate car parking is provided and a significant number of bicycle parking spaces are also to be provided on site. The recommended revisions to the site can be carried out in accordance with the requirements of the Planning Authority.”*

Finally, the Inspectors Report sets out, in the conclusion that *“Having regard to the provisions of the Dublin City Development Plan 2022 - 2028, and the zoning for residential purposes, to the location of the site in an established residential area and to the nature, form, scale and design of the proposed development, it is considered, that subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.”*

4. Rationale For Development

The current proposed development will comprise the following:

- A Large-Scale Residential Development with 145 residential units (70 no. 1 bed and 75 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 5 storeys.
- The proposal includes a creche and a community, cultural and arts space at the ground floor of blocks 4 and 5.
- 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.

Overall Layout

The residential buildings are set out in five blocks ranging in height up to 5 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 Proposed layout demonstrating the distances from the building blocks to adjacent properties

Density

The proposed net density of 116 uph is higher than the existing low density, two storey suburban residential development in the surrounding area. However, the proposed density is in line with the DCDP which seeks to achieve a density within the range of 60-120 uph in 'Outer Suburbs'. Please refer to the assessment of 'Appendix 3, Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density, and Scale' from the DCC Development Plan, included in the statement of consistency later in this document.

Furthermore, due to changes in the bus services in the vicinity of the site due to BusConnects, both existing and proposed, and confirmation from the NTA that this site has a PTAL of Medium to High level of service, the site is considered, in line with the Apartment Guidelines 2023, an Accessible Urban Locations. This is also confirmed in the Public Transport Capacity Study.

Route No.	Route	Weekday Off-Peak Frequency	Weekday Peak Frequency	Bus Stop Location (Approx. Distance)
9	Charlestown SC – Greenhills College	12-15 mins	10 mins	Kimmage Road West (300 m)
15A	Merrion Square – Limekiln Avenue	20 mins	15 mins	Kimmage Road West (300 m)
54	Liffey Valley – Ballyfermot – Crumlin – Milltown – UCD	10 mins	10 mins	Kimmage Road West (300 m)
54A	College Street – Marfield Drive	30 mins	20-30 mins	Kimmage Road Lower (500 m)
74	Dundrum – Whitechurch – Crumlin – City Centre	30 mins	30 mins	Kimmage Road Lower (500 m)
83/83A	Stannaway Ave – Charlestown Sc	12-15 mins	10 mins	Stannaway Avenue (700 m)

Figure 7 Extract from PTCS indicating bus frequency and proximity

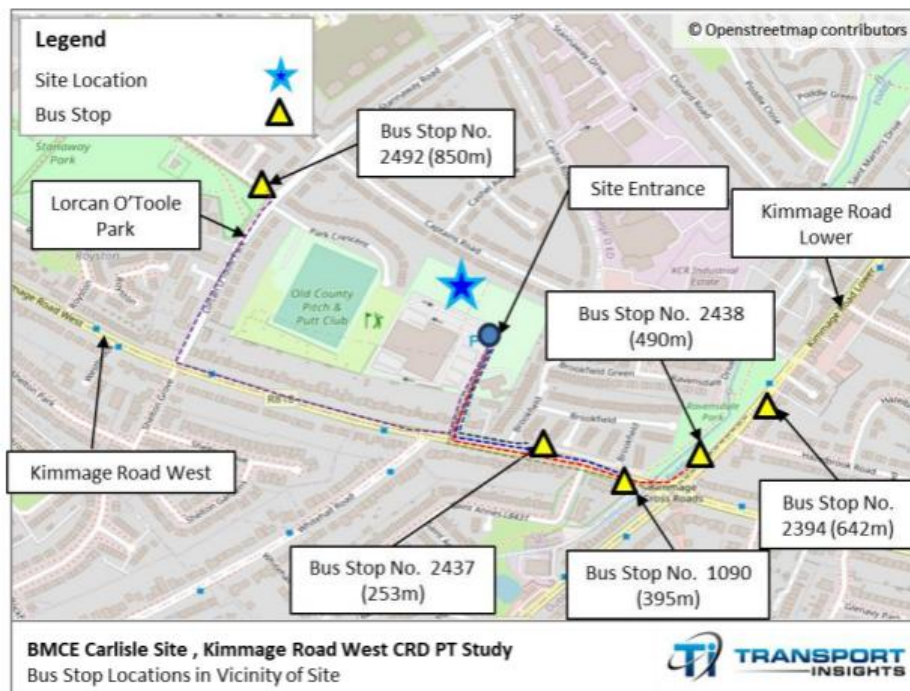


Figure 8 Extract from PTCS Indicating Bus stop proximity to the site

This site is within c.300m, from the number 9, S4 and 15 bus stops (No. 2437 and 1090) on the Kimmage Road. Both the number 9 and S4 run every ten minutes at peak times. The Apartment Guidelines state that “*Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus service*” are generally suited for “*small to large scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments.*”

The site’s proximity to shopping, community facilities and employment locations, as demonstrated in the Site Description and Context section of this report, further emphasise this and will ensure the delivery of the most sustainable form of development, making the best use of this scarce resource, zoned serviced land.

The density is also in accordance with the Compact Settlements Guidelines 2024, under these Guidelines, the site would be considered to be located in a City-Urban neighbourhood with **residential densities in the range 50 dph to 250 dph (net)**. Please refer to the Statement of Consistency within this report for further detail.

Policy document		
Proposed Site Density: 116 uph	BKD Schedule of Accommodation Gross Site Area: 1.90ha Net Site Area: 1.25ha	
Development Plan 2022-2028	<p>Section 15.5.5</p> <p>Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 Guidelines which seek to consolidate development within exiting urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities.</p> <p>New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods.</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</p>	<p>It is noted that the Appendices to the Development Plan detail the relevant density ranges.</p> <p>The proposal achieves appropriate separation distances between the proposed buildings and the existing neighbouring properties, thereby protecting the amenity of adjoining residents while supporting the consolidation of this suburban site.</p> <p>While to the north, west and east of the site there are the rear boundary walls to the existing two storey housing, to the south there is a more varied building style with the immediate neighbours of the Ben Dunne gym and the Nora Dunne</p>

	<p>sustainable neighbourhoods. Refer to Appendix 3 for further details.</p>	<p>gallery (now closed). Both of these buildings are large community buildings. It will be in the context of these larger buildings the development will be primarily viewed and read, due to the location of the access road, and visibility from this location.</p> <p>The increased density, and the high quality of the urban design within the scheme ensure appropriate, attractive place to live and visit while also supporting the vitality and viability of the area.</p> <p>As demonstrated by the Public Transport Capacity Study this is an accessible site and there is sufficient capacity on the existing bus routes to accommodate these additional properties.</p>														
Appendix 3, section 3.2, Table 1 Density Ranges	<table><tr><th>Location</th><th>Net Density Range (units per ha)</th></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 Range (units per ha)	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	<p>This site is located in the Outer Suburbs. Therefore, with a net density of 116uph it is in accordance with the density range set in this table. Appendix 3, Section 3.2 has been assessed, and compliance has been demonstrated within this report in the Statement of Consistency.</p>
Location	Net Density Range (units per ha)															
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															
Apartment Guidelines 2023	<p>1) Central and/ or Accessible Urban Locations</p> <p>Such locations are generally suitable for small to large-scale (will vary subject to location) and</p>	<p>This site is located c. 1km from both Kimmage Village and within under c.300m to high frequency bus</p>														

	<p>higher density development (will also vary), that may wholly comprise apartments, including</p> <ul style="list-style-type: none"> • Sites within walking distance (i.e. up to 15 minutes or 1,000-1,5000), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions • Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000) to /from high capacity urban public transport stops (such as DART/ LUAS); and • Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services 	<p>routes. This is confirmed by both the PTCA and TIA submitted with this application</p> <p>Given the frequency of the Bus Services and the high volume of bus routes within the vicinity this site is a Central and/ or Accessible Urban Location. Therefore the provision of higher density is in accordance with the Apartment Guidelines.</p>
Compact Settlements Guidelines 2024	<p>Section 3.3 Settlements, Area Types and Density Ranges Table 3.1 – Areas and Density Ranges Dublin and Cork City and Suburbs City- Urban Neighbourhoods The city urban neighbourhood category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are high accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.</p>	<p>This site, as set out above, has good access to public transport. It is a location with ease of access to employment and education uses.</p> <p>It is within a suburban area of Dublin City Centre. As such it is considered to fall within this category, specifically within category (iv) <i>lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are high accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250dph (net) shall generally be applied in</i></p>

		<i>urban neighbourhoods of Dublin and Cork.</i>
	<p>Table 3.8 Accessibility</p> <p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> - Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or Metrolink services; or locations within 500 metres walking distance of an existing or planned Bus Connects Core Bus Corridor stop. - Highest densities should be applied at the node or interchange and decrease with distance. - Planned public transport in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport. 	<p>As set out in the TTA and the PTCA this site is within c.300m of an existing high frequency bus service. Furthermore, Kimmage Road West also has proposed bus routes planned under the Bus Connect Corridor Bus stop.</p> <p>Therefore, this site can be considered a site with High-Capacity Public Transport Node or Interchange or as an Accessible location.</p>
	<p>Accessible Location</p> <ul style="list-style-type: none"> - Lands within 500 metres (i.e. up to 5-6 minutes walk of existing or planned high frequency (i.e. 10 minutes peak hour frequency) urban bus services. 	

Unit Mix

The proposed unit mix breakdown is as follows:

Unit Size	No. Of Units	Percentage
1 bed	70	48.3%
2 bed	75	51.7%
Total	145	100%

Table 6 Proposed Unit Mix

This proposed housing mix is in accordance with SPPR1 of the Apartment Guidelines 2023 and the Development Plan. 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 57.3% 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 2023 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.

Blocks 1, 4 and 5 rise to 4 storeys in height and blocks 2 and 3 range in height up to 5 storeys. This is a storey less than the highest buildings previously permitted by DCC under LRD6018/22-S3. 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.



Figure 7 Proposed buildings the subject of this application.



Figure 8 Previously permitted buildings by ABP and DCC under LRD6018/22-S3

In addition, blocks 4 and 5 (which are linked) are only up to 4 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 5 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.

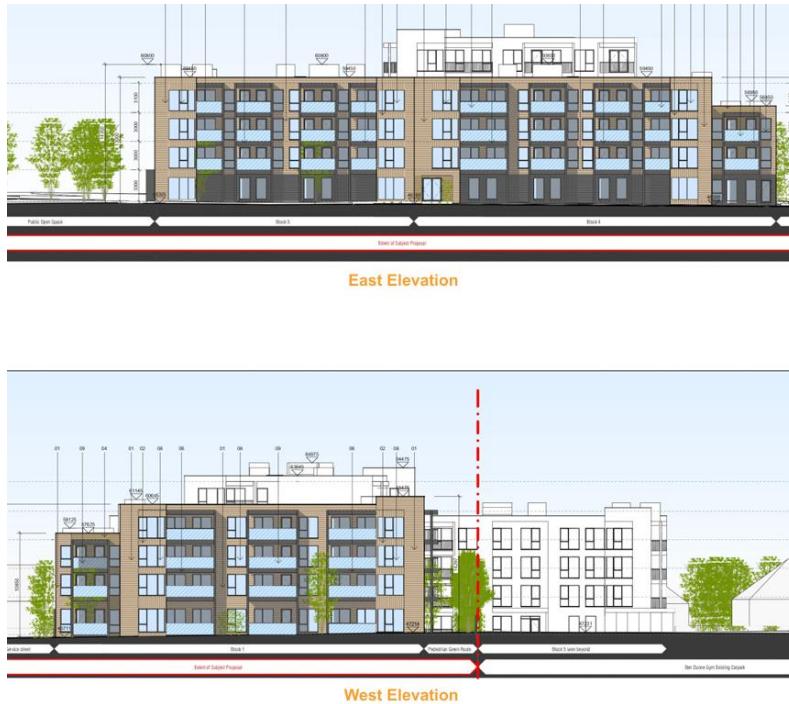


Figure 9: Elevations of the proposed buildings. Source: BKD Architects



Figure 10 Previously permitted buildings by ABP and DCC under LRD6018/22-S3

The buildings will be 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's building height has been reduced by 3m to 4 storeys and is over 25.4m away from its nearest neighbour. This is discussed further in the 'Response to the DCC Opinion' section below.

Block 4 is located over c.24m away at its nearest point to the north and over 29m away at its nearest point to the east.

Blocks 2 and 3 are also located in excess of c. 26m from the neighbouring properties to the north.

These distances, which exceed the 16m requirement in the Compact Settlement Guidelines and the Development Plan requirements of 22m, in association with 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 existing neighbouring properties being protected.



Figure 11 Image demonstrating building heights of the proposed development. Source: BKD Architects.

Daylight, Sunlight and Shadowing

A Daylight and Sunlight Analysis has been prepared by IN2 and is submitted as part of this planning application.

The report confirms in the Executive Summary and conclusion that ***“All of the spaces were comfortably compliant with the BRE criteria to receive at least 2 hours of sunlight on March 21st, for at least 50% of the space. The overall sunlit percentage for Communal Open Space (COS) and Public Open Space (POS) are 86% and 97%, respectively, which is well over the 50% compliance rate.***

The impact of the proposed development on nearest neighbouring buildings is discussed in Section 4. The relevant selected neighbouring buildings were assessed for both Vertical Sky Component (VSC), a measure of potential daylight, and Annual Probable Daylight Hours (APSH), a measure of direct sunlight. All selected neighbouring windows were found not to be impacted by the proposed development and the detailed results are presented in Section 5.3. All relevant selected neighbouring outdoor spaces and sensible potential solar panel locations were also found not to be impacted by the proposed development. These results are presented in Section 5.4.2, and 5.5.2 respectively.

Section 5 includes daylight analysis that has been undertaken for the kitchen/living/dining (KLD), living room and bedroom spaces in assessed units (Apartment and Duplex).

All units were assessed for the Spatial Daylight Autonomy (SDA) methodology as detailed in the BRE Guide. A very high compliance rate of 98% of the rooms, were found to be compliant for BRE Guide recommendation and detailed results are presented in Appendix C.

For any unit not achieving minimum compliance for SDA, these have been identified, and compensatory measures have been provided in section 6.3.

Section 6 included the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to each unit. The proposed development achieves a high compliance rate, with 90% of the units exceeding the minimum recommendations. Detailed results are included in Appendix D.

For any unit not achieving minimum compliance for ETS, these have been identified, and compensatory measures have been provided in section 7.3.

In conclusion, this report confirms that best practice Daylight and Sunlight availability has been ensured for the proposed development at Carlisle, Kimmage, Dublin, with no impact on the existing neighbouring environment.” (MCG Planning emphasis)

Overlooking

The proposed development is located at appropriate distances away from existing residential development within the surrounding area. The proposed development is set back from the site boundaries to provide at least c. 24.8m 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, railings to the communal open space, 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 3 storeys at the northern boundary and up to 4 storeys (block 1 and 5) and 5 storeys (blocks 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 3 to 4 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.

Along the western boundary block 1 steps from 3 storeys on the northern boundary up to 4 storeys on the southern boundary. All of the existing houses are over c.24m 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.

To the north, fronting onto Captains Road, the blocks are located between c.24m and c.31m away. All of these blocks are 3 storeys fronting onto Captains Road and then stepping up to 4 storeys (Blocks 1 and 4) and 5 storeys (Blocks 2 and 3), resulting in the top two floors being over c.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 the gable ends of the proposed building, 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.

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.

Within the proposed development, all blocks are in excess of the Compact Settlement Guidelines of 16m between buildings. Between blocks 1 and 2 there is over c.21m, between blocks 2 and 3 there is over c. 20m and between blocks 3 and 4 there is over c.22m. These distances ensure an appropriate level of amenity for future occupants of this development in accordance with National Planning Guidelines. Where there is any risk of undue overlooking appropriate measures, such as opacified glazing, has been implemented to ensure future residents privacy is protected.

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.

Open Space

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 east of the site, adjacent to block 5 and to the north of the existing Nora Dunne Gallery. The rationale for providing the public open space in this location is due to its proximity to both the former art gallery and the gym opposite, as a result the proposed development will provide an adjacency of use and will ensure ease of access to the wider public.

The proposed development includes c. 1,261sqm of public open space and a further c. 1,860sqm 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. The communal open space exceeds the requirements of the Apartment Guidelines by c. 910qm.

The proposed public open space contributes to the public domain and is accessible to the public for the purposes of active and passive recreation.

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. Please refer to the Letter of Consent submitted with this application.

The design has also been assessed against DMURS. An Independent Quality Audit has been carried out by Bruton Consulting Engineers and is submitted as part of this application.

A Public Transport Capacity Study has been undertaken by Transport Insights. This report's conclusion confirms that *"based on the findings of public transport occupancy surveys, mode share targets set out within the Residential Travel Plan, and analysis contained within this note, it was found that the residents of the proposed development would utilise 1.1% of total existing AM and PM peak hour bus service capacities. During the AM and PM peak hours, excess bus service excess capacities were found to be 63% and 67% in the direction of maximum demand. As such, it is apparent that current public transport capacity is sufficient to accommodate the small additional demand generated by the proposed development. Furthermore, a review of recently permitted developments within the application site's vicinity has confirmed that sufficient excess peak hour capacity exists on local bus services to accommodate their cumulative transport needs."*

Parking

There are 89 no. car parking spaces proposed, of which 83 are for the residents, within the scheme which equates to a rate of 0.57 per unit. 2 no. spaces are allocated to the community/ cultural uses, and 4 no. spaces are allocated to the creche proposed. Of these spaces 7 are specifically dedicated to Universal Access car parking. The car parking is in accordance with the Development Plan of Dublin City Council, which promotes a maximum of 1 per unit.

The proposal includes 465 no bicycle spaces (316 no. residential, 132 no. residential visitor spaces, 12 no. for cultural/ community use and 5 no. spaces for the creche), which exceeds the 293 no. cycle parking spaces required by the Apartment Guidelines as well as the requirements set out in the Development Plan.

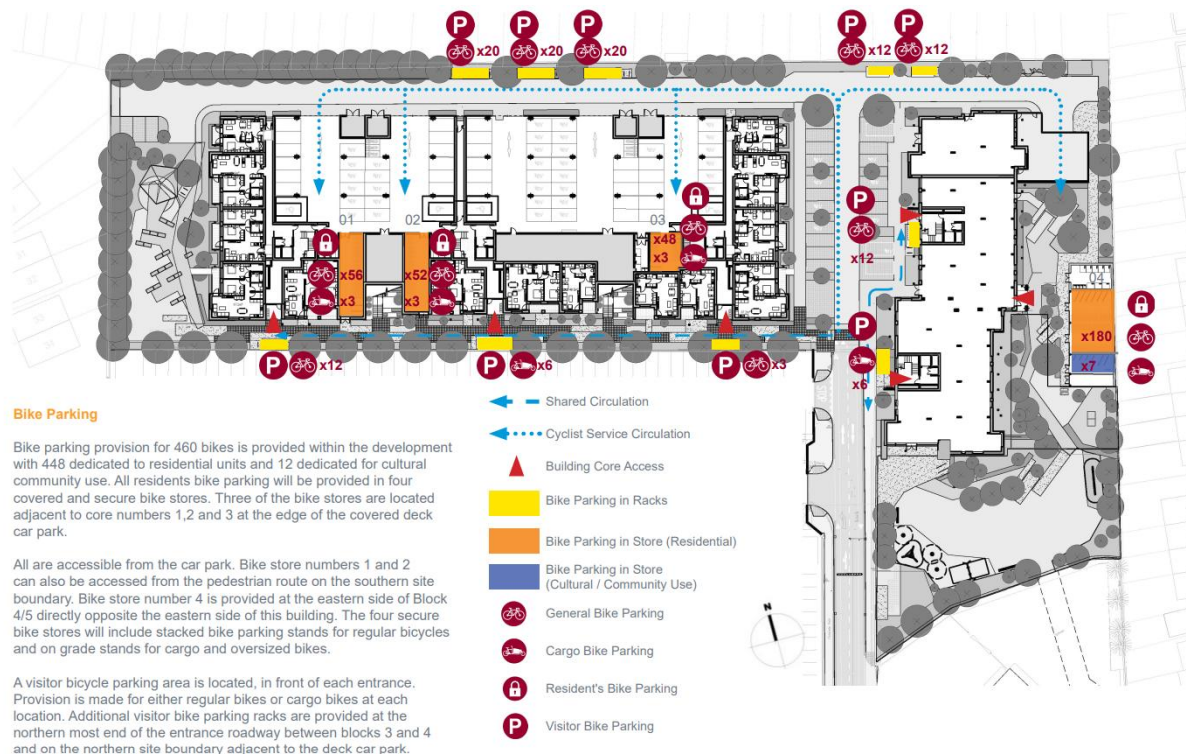


Figure 12 Location of bicycle parking throughout the development (extract from the Design Statement)

Barrett Mahony (BMCE) have completed a Car Park Management Strategy and a Parking Provision Report and Residential Travel Plan, all of which support the inverse of the norm with lower car parking provision and very high cycle parking. As set out in BMCE reports the proposed development will provide an over provision of 157 no. cycle spaces 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.

Permeability

This site is highly accessible, which, as set out in the transport section above, further facilitates the proposed 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 connection to the Uisce Eireann network 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.

It is noted that the upgrades to the Uisce Eireann (UE) network to enable connection are within the public domain and are likely to be delivered by Uisce Eireann or a contractor to Uisce Eireann. It is also noted that UE have Exempted Development permission under Class 58, Schedule 2, of the Planning and Development Regulations. These works to enable the connection would fall under this class. However, in the interest of clarity it was deemed appropriate to include these works within this planning application.

In terms of flood risk, the Site-Specific Flood Risk Assessment prepared by BMCE concludes that *“Based on available and recorded information, the site of the proposed residential blocks itself has not been subject to flooding in recent history. Adjacent areas, including part of the existing access road, however, have experienced flooding. However, the flood depths on the access road would not impinge access and egress for emergency service vehicles.*

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

The risk of fluvial flooding to the residential buildings and surrounding footpaths and roads is considered low as these areas lie outside the 0.1% AEP event. Fluvial flooding to the existing access road will not impact access and egress of emergency service vehicles.

The proposed Poddle Flood Alleviation Scheme will negate the risk of fluvial flooding on the existing access road and Kimmage Road west in the 1% AEP event.

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 the development.

Based on the flood risk identification in Stage 1, the existing access road serving the proposed development falls in Flood Zone A & B. A justification test has been applied and the proposed development is deemed ‘Appropriate’ in accordance with the guidelines of the OPW’s publication.

Part V

Please see the submitted Part V pack which includes one and two bed units to be distributed around the site. Please also refer to the Part V Validation Letter submitted as part of the application which confirms that McGill Planning Ltd have engaged in Part V discussions with Dublin City Council on behalf of their client and an agreement in principle to comply with their Part V requirement has been reached.

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 their Architectural Design Rationale the development provides the specific detailing of materials, elevations and external finishes to the buildings. The finishes have been chosen to ensure that they are high quality, durable and sustainable finishes providing a high-quality development.

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.

Ecology

The Ecological Impact Assessment (EclA) completed by Altemar Consulting Engineers for this application confirms that the following surveys have been carried out since September 2024:

Survey	Surveyor	Dates
Flora and Habitat	Jeff Boyle (BSc) (Altemar)	September 20 th 2024, 10 th April 2025
Bat	Jeff Boyle (BSc) (Altemar)	10 th April 2025
Mammal	Jeff Boyle (BSc) (Altemar)	21 st January 2025, 28 th March 2025
Wintering Bird	Jeff Boyle (BSc) & Gayle O'Farrell (Altemar)	27 th October 2024, 31 st October 2024, 13 th November 2024, 21 st November 2024, 27 th November 2024, 21 st January 2025, 13 th February 2025, 3 rd March 2025, 11 th March 2025, 19 th March 2025, 28 th March 2025, 10 th April 2025.

The EclA confirms the following Residual Effects likely to occur from the project (post mitigation):

“Standard construction and operational mitigation measures are proposed. These measures are not being relied upon in respect of any potential impact on the Natura 2000 sites or their Qualify Interests. These would ensure that water entering the surface water drainage network is clean and uncontaminated. However, early implementation of ecological supervision and consultation with Inland Fisheries Ireland and prior initial mobilisation and enabling works is seen as an important element to the project, particularly in relation to the implementation of surface water runoff, dust mitigation, bat, amphibian, mammal and avian mitigation.

With the successful implementation of standard mitigation measures to limit surface water impacts on the watercourses, biodiversity mitigation/supervision, no significant impacts are foreseen from the construction or operation of the proposed project on terrestrial or aquatic ecology. Residual impacts of the proposed project will be localised to the immediate vicinity of the proposed development.

The construction and operational mitigation proposed for the development satisfactorily addresses the mitigation of potential impacts on terrestrial biodiversity, aquatic biodiversity and bats through the application of the standard construction and operational phase controls as outlined above. In particular, mitigation measures to ensure compliance with the Local Government (Water Pollution Act) 1977 as amended and prevent silt and pollution entering the drainage network satisfactorily address the potential impacts on downstream biodiversity.

In relation to bats, foraging onsite should persist with lighting on site restricted to the housing development area and no lighting is proposed in the vicinity of the hedgerows and treelines where foraging was observed. No trees of bat roosting potential were noted on site or will be felled as a result of the proposed development. There will be no disturbance of resting or breeding places of bat species.

No significant adverse impacts on the conservation objectives of European sites are likely in the absence of mitigation measures outlined above. It is essential that these measures outlined are complied with, to ensure that the proposed development does not have “downstream” environmental impacts and significant impacts on biodiversity on site.

Potential Residual Impacts: Low adverse, local, Negative Impact, Not significant & long term.”

The EclA concludes that “The construction and operational mitigation proposed for the development satisfactorily addresses the potential impacts on the sensitive receptors through the application the standard construction and operational phase controls. The overall impact on the ecology of the proposed development will result in a long term minor adverse not significant long term residual impact on the ecology of the area and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional biodiversity features including sensitive landscaping and lighting strategy.”

Altamar Consulting Engineers also completed an Appropriate Assessment Screening for the site. This report concludes the following:

“The proposed development site is located within a populated urban environment. The nearest European sites are South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA (6.4km and 6.6km respectively). There is no direct hydrological or biodiversity pathway between the subject site and these Natura 2000 sites, or any other site. The nearest watercourse is the River Poddle located approximately 400m to the east of the site (Figure 10). It is proposed to discharge excess surface water to the existing sewer on Kimmage Road West to the south of the site. This network flows a short distance (C. 400m) northeast where it joins the River Poddle. The River Poddle flows north C. 3.6km where it discharges to the River Liffey at Ushers Quay in Dublin City Centre. As the Liffey flows to Dublin Bay, it is therefore considered that there is an indirect hydrological pathway between the subject site and Natura 2000 sites at Dublin Bay including South Dublin Bay SAC (6.4km), North Dublin Bay SAC (9.6km), South Dublin Bay and River Tolka Estuary SPA (6.6km), North Bull Island SPA (9.5km) and North-West Irish Sea SPA (10.8km). However, given the minimum distance from the proposed development site to these sites (>6km), the existing surface water drainage network, and the significant fluvial distance between the subject site and Natura 2000 sites at Dublin Bay, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately settle within the surface water drainage network, the River Poddle and River Liffey prior to reaching the extensive marine environment at Dublin Bay. Foul water will be discharged to the existing network on Kimmage Road West. This network ultimately discharges to Ringsend WwTP for treatment under license. Based on best scientific evidence, the proposed development individually or in combination with other plans or

projects will have no likely significant effects on the conservation objectives of any European site. No specific mitigation is required to prevent impacts on European sites.

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that there will be no likely significant effects on conservation objectives of European sites either individually or in combination with other projects. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European site."

Townscape and Visual Impact

A Townscape and Visual Impact Assessment was prepared by Model Works to assess the potential impacts of the proposed development on the surrounding receiving environment. 14 no. representative viewpoints were selected for this assessment and the effects on the viewpoints are assessed in the TVIA document.

The assessment concludes that, "on balance, the proposed development can be considered a neutral to positive intervention in the townscape. For a development of its scale, it would affect a relatively confined area, and in that area, there is capacity to accommodate change (due to (a) the current condition of the Carlisle lands, occupied by the gym and the unused site, and (b) the established trend of similar change in the wider area). The development would strengthen the urban character and place-identity of the Carlisle area and elevate the quality of the built environment locally (due to the development's high quality of design and materials). The change is appropriate in this location and would contribute to realising the DCDP vision for Sustainable Residential Neighbourhoods and a 15-minute city."

5. Statement of Response to S247 Comments by Dublin City Council

The S247 Meetings took place between the applicant's design team and Dublin City Council on the 7th November 2024 via MS Teams.

Issues raised by Dublin City Council (notes taken by applicant)

Drainage Department advised that the conditions from the previously permitted development should be addressed and a Flood Risk Justification Test should be included.

- Please see the Infrastructure Report by BMCE. This includes information on the proposed drainage strategy
- A SSFRA is included with this application.

Cultural uses – contact should be made with Ray Yeats

- This is noted. The applicant will liaise with DCC prior to submitting a full application.
- Turley's have completed a Community/ Cultural Assessment which is submitted as part of this application which identifies existing facilities in the area.
- The location of the community/ cultural space is at the ground floor of block 5, overlooking the proposed public open space and adjacent to the existing, closed, Nora Dunne Gallery.

Residential amenity of the existing neighbours

- Please see the description above. Given the distance involved, which are in excess of both the Development Plan and the Compact Guidelines, the existing residential amenity will not be unduly impacted. Please see the BKD Architects Design Rationale which clearly sets out the distances and relationship with the adjacent neighbours.

6. Statement of Response to S32B Pre-Planning Meeting and DCC LRD Opinion

An LRD Meeting, planning authority reference LRD6073/24-S2, was held on the 21st of January 2025 via Microsoft teams. Following this LRD Meeting under section 32 of the Act, the council were required to provide an Opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

Following consideration of the issues raised during the LRD meeting the Planning Authority issued its Opinion on the 14th of February 2025. This confirmed that the proposal “requires further consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development.”

The Opinion went on to state that in the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by the following:

Items	Applicant's Response
Statement of response to the issues set out in the LRD opinion.	This section of the planning report provides a response to all of the items raised in the Opinion.
Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.	Section 8 of this planning report (below) addresses in detail the Development Plan policies and objectives and confirms that the application is consistent with the Development Plan.

The Opinion also stated that: *“Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the applicant is hereby notified that the documents submitted in relation to the following issues did not constitute a reasonable basis on which to make an application. The applicant is advised that these issues or areas must be addressed in any documents submitted in a future planning application, in order to constitute a reasonable basis on which to make an application”.* Please refer to the table below for the applicant's response to the items raised in the opinion:

Items raised in LRDO	Applicant's Response
1. Planning	
a. The applicant is requested to re-examine the scale and massing in the south-western corner of the site to ensure a more appropriate transition in scale between Block 1 and the existing two-storey houses on Park Crescent.	In order to create a more appropriate transition in scale between Block 1 and the existing 2 storey house on Park Crescent, the applicant has lowered the top floor of Block 1 from 3 to 5 storeys to 3 to 4 storeys block. The overall height of Block 1 has been lowered by 3 metres. Please refer to the 'LRD Opinion Response' Document prepared by BKD Architects which demonstrates the reduction in height.

Proposal as submitted for the LRD Stage 2 Application in December 2024:

Carlisle - Level 04 plan submitted to DCC under LRD Stage 2



Figure 13 Proposal as submitted for the LRD Stage 2 Application in December 2024

Revised proposal in response to the LRD Opinion showing block 1 has been reduced by 1 storey:

(loss of 4no. 2 beds & 1 no. 1bed (5 units overall) at level 04 block 01)



Figure 14 Revised proposal in response to the LRD Opinion showing block 1 has been reduced by 1 storey

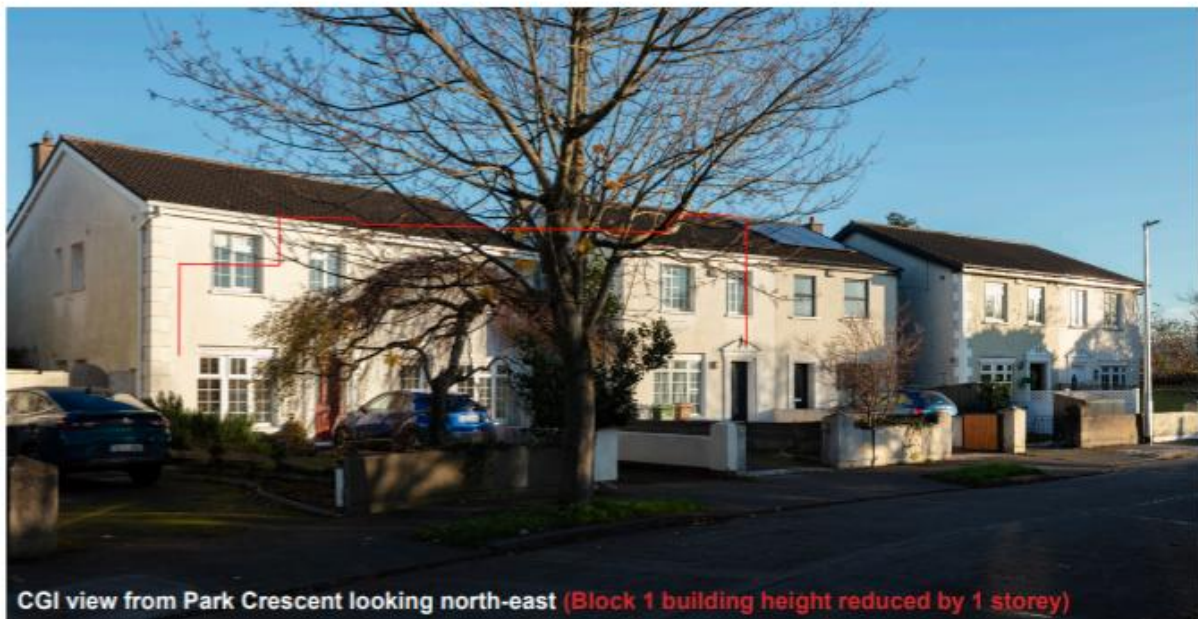


Figure 15 Visuals demonstrating the difference between the LRD Stage 2 proposal (top image) and the current proposal from Park Crescent. (bottom image)

<p>b. Further details should be submitted in relation to the proposed provision of community and cultural space in accordance with Policy CUO25 of the current Dublin City Development Plan (2022-2028). This should include details of consultation with Dublin City Council's Arts Officer.</p>	<p>Please refer to the Cultural Infrastructure Assessment and Social Infrastructure Audit prepared by Turley submitted as part of this application. The proposed development provides 813sqm (5.6% of the total gross floor area) of Community and Cultural space at the ground floors of Blocks 4 and 5. The proposal includes 10 no. artists' studios and shared kitchen and amenity spaces.</p>
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	<p>Please refer to 'Proposed Level 00 Ground Floor Plan' for floor plans of the proposed cultural space. The ground floor of these blocks also provides for a new creche which can provide childcare for the development itself and the wider community.</p> <p>As such this proposed development fully meets the requirements of Policy CU025 of the Dublin City Development Plan.</p>
c. Elevational drawings should be submitted for the community and cultural space, which should include details of indicative signage zones, with full details of signage to be agreed prior to occupation of the space. Signage should consist of individual letters or other characters attached directly to the fascia or façade of the building and should be of a high quality material appropriate to the design of the building.	<p>Please refer to the BKD 'Response to LRD Stage 2 Opinion' document which indicates the proposed signage for the community and cultural space. The signage has been designed in accordance with DCC's requirements to consist of individual letters or other characters attached directly to the fascia or façade of the building. The proposed signage is of high-quality material. These signs are indicative and can be the subject of a separate application or condition, dependent of the end user.</p>
d. It is noted that there is a discrepancy in the submitted childcare assessment, which concludes that it is proposed to provide a childcare facility as part of the proposed development. No childcare facility is shown on the submitted plans. This discrepancy should be addressed in the stage 3 application.	<p>The proposed development contains a creche at the ground floor of Block 4 c.210 sqm (20 spaces) and outdoor area (130sqm).</p> <p>Please refer to the Childcare Assessment prepared by Turley submitted as part of this application.</p>
e. The childcare assessment should also be updated to include details of the capacity of the existing childcare facilities in the area, including a breakdown between full time, sessional, pre-school and drop-in facilities and an assessment of likely future demand in the local area. In the event of the assessment demonstrating a shortfall in provision in the area, the applicant should consider the provision of a childcare facility as part of the proposed development and amend the plans accordingly.	<p>The Childcare Assessment submitted as part of this application by Turley has confirmed that there are 8 no. childcare facilities operating within 1km of the subject site. A telephone survey was conducted in March 2025 which confirmed capacity.</p> <p>The Assessment also confirmed a demand of 3 to 5 childcare spaces.</p> <p>The proposed development contains a creche at the ground floor of Block 4 c.210 sqm (20 spaces). This is sufficient to accommodate the development. The proposed creche, dependant on the end operator, can provide a full time service should it be required.</p>
f. While the proposed provision of permeability through the site is welcomed, it is not considered necessary for all of the ground floor areas of communal open space to be	<p>Please refer to the landscape design statement prepared by NMP. The proposed Communal open spaces will be defined with a low 1.1m railing with gated access for residents only. The railing will be set within 1.1m high hedge to</p>

<p>publicly accessible as this can compromise their function as semi-private open space for use by residents of the proposed development. The applicant should note that the Planning Authority would not be in favour of a fully gated development and that the design should therefore incorporate measures to ensure privacy and security, where required, within the development. In this regard details should be submitted in relation to how it is proposed to delineate the areas of communal open space from the public open space, allowing each block to have one publicly accessible frontage to ensure that that access can be provided to residents and visitors without compromising the quality of the private spaces. The provision of privacy screening to ground floor apartments should also be considered.</p>	<p>screen its impact visually. The low railing provides delineation for residents but also offers visual permeability. The privacy buffer of 1.5m to private amenity spaces has been provided with hedge planting alongside the ground floor apartments for the privacy screening.</p>
<p>g. A screening report for Appropriate Assessment should be submitted. If the report concludes that the proposal, in itself or in combination with any other plans or projects, would be likely to have significant impacts on the qualifying interests of any Natura 2000 sites, a Stage 2 Appropriate Assessment/Natura Impact Statement should be submitted with the application.</p>	<p>Please refer to the Appropriate Assessment screening report prepared by Altamar. This report confirms that:</p> <p><i>“Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that there will be no likely significant effects on conservation objectives of European sites either individually or in combination with other projects. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.</i></p> <p><i>This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific</i></p>

	<i>knowledge, is likely to have a significant effect on any European site."</i>
h. The screening for EIAR should be revised to include the conclusions of the Appropriate Assessment screening or, if required, the Natura Impact Statement	Please refer to the EIA Screening prepared by MCG Planning. This assessment includes the conclusions of the AA Screening.
i. A comprehensive Sunlight and Daylight Assessment should be submitted.	Please refer to the Sunlight and Daylight Assessment Report prepared by IN2 Engineering. The report prepared by IN2 confirms that best practice Daylight and Sunlight availability has been ensured for the proposed development, with no impact on the existing neighbouring environment.
2. Traffic and Transportation Matters	
<p><u>a) Private Access Road / Internal Road Network:</u></p> <p>i. The Stage 1 Quality Audit referred to in the submitted documentation shall be provided with the planning application.</p> <p>ii. Evidence of legal consent from the landowner for works to the private road providing access to the site shall be included with the application.</p> <p>iii. The design of the proposed pedestrian crossing of the private access road at the priority junction with Kimmage Road West shall be reviewed and additional measures to improve pedestrian safety / comfort at this location shall be proposed.</p> <p>iv. The proposed uncontrolled tactile crossing of the private access road adjacent to the pedestrian entrances to the gym and art gallery shall be upgraded to a raised table crossing.</p> <p>v. The proposed drop-kerb crossing at the existing vehicular entrance to the art gallery and revised access / egress to the gym car park shall be replaced with a continuous footpath at a raised Level, ramped and dropped as necessary (e.g. 32mm kerb over carriageway) to facilitate car entry / exit.</p> <p>vi. Street lighting proposals for the private access road shall be submitted. Lighting shall be upgraded as required to account for the additional footpath along the eastern side of the access road.</p> <p>vii. The initial north-south section of the internal road network (i.e. between Blocks 3 and 4 / 5) shall be reduced to a width of 4.8m. A portion of the resulting additional area shall be given to increasing the depth of the adjacent perpendicular parking bays.</p>	<p>Please refer to Section 9 of the Infrastructure Report prepared by BM 'Response to LRD Opinion' which responds to each of the items requested.</p> <p>i) A Stage 1 Quality Audit has been carried out by Burton Engineering and accompanies this LRD Application.</p> <p>ii) Please refer to the Letter of Consent provided by Mary Dunne which accompanies this application. This Letter of Consent refers the works to the private road providing access to the site.</p> <p>iii) The width of the access road is dictated by access requirements for refuse and fire tender vehicles. Tactile paving and a delineated crossing have been added to improve the current scenario.</p> <p>iv) This crossing point has been upgraded to a raised table crossing. Refer to Proposed Roads layout Drawing CST-BMD-00-ZZ-DR-C-1017.</p> <p>v) A continuous footpath at a raised level has now been provided, with a 32mm kerb and ramped access to facilitate car entry/exit. Refer to Proposed Roads layout Drawings CST-BMD-00-ZZ-DR-C-1017.</p> <p>vi) Please refer to the Site Lighting Plan prepared by IN2 Engineering. This plan indicates the proposed lighting for the additional footpath along the eastern side of the access road. Any further amendments to the lighting plan can be</p>

	<p>addressed by way of condition, as DCC sees fit.</p> <p>vii) The internal north south road width has been reduced from 6m to 4.8m. The perpendicular parking bays either side have been extended by 600mm. Refer to Proposed Roads layout Drawings CST-BMD-00-ZZ-DR-C-1017.</p>
<p>b. Cycle / Car Parking:</p> <p>i. Details of secure e-bike charging facilities for residents shall be provided.</p> <p>ii. Achievement of the critical dimensions for access to cycle parking in accordance with Section 6.5 of the Cycle Design Manual (2023) shall be demonstrated, including access aisle widths, doorway widths and clear space to the front of stands. This information shall be clearly illustrated on submitted drawings.</p> <p>iii. In accordance with Section 5.0 of Appendix 5 of the City Development Plan, the quantity of EV charging spaces shall be increased to at least 50% of the total car parking provision</p>	<p>Please see detail drawings '6269 LRD-P-302 Bike Stores Blocks 1 - 3' & '6269 LRD-P-303 Block 4 & 5 Signage Setting Out' included in the application which detail the full extent of the bicycle storage provided, including secure e-bike charging facilities, within the subject application and demonstrate how the design complies with the National Cycle Design Manual.</p> <p>50% of the total car parking spaces will be EV Charging Spaces, refer to section 8.1 of this report.</p>
<p>3. Drainage – Surface Water Management</p>	
<p>The surface water management proposal and flood risk assessment should be amended prior to planning application stage to address the following comments:</p> <p>i. Flood Risk Assessment - Whilst FRA notes level of 46.02mOD as the 0.1%AEP Fluvial flood level, there are no supporting information on how this level was established. Clarity needed on how 0.1%AEP fluvial flood level was established for the site.</p> <p>ii. Surface Water Management</p> <ul style="list-style-type: none"> Sustainable Drainage Systems (SuDS) include integrated green and blue roofs, blue roof in areas with PV panels and permeable paving. Some infiltration is assumed through the base of the attenuation tanks. Incorporation of a range of SuDS measures and in particular green / blue roof at all roof levels is welcomed. Possibility of incorporating rainwater harvesting for blue roof areas should be explored. Clarity is required on the final surface water discharge rate from the development. Report mentions 21/s in places and 2.47l/s in others. 	<p>Please refer to Section 9 of the Infrastructure Report prepared by BM 'Response to LRD Opinion' which responds to each of the items requested.</p> <p>(i) The Site Specific Flood Risk Assessment (SSFRA) which accompanies this application has been revised to correct the 0.1% AEP and 1% AEP levels. Refer to Section 5 of the SSFRA.</p> <p>(ii) Rainwater harvesting was explored but was not deemed viable due to limitations in plant space for equipment and tanks in Blocks 1-3. There is also no residential plantroom or area in Blocks 4 and 5.</p> <ul style="list-style-type: none"> The Infrastructure Report has been amended to clarify that the final outflow rate is 2.5 l/s (not 2 l/s). This is based on 2 l/s/ha for a 1.25Ha site. There is only 1 flow control device located at outlet of the second attenuation tank. The system has been

<ul style="list-style-type: none"> • There are two attenuation tanks proposed, a 146m³ and a 550m³ tank. The drainage layout shows only 1 flow control device which is located at the outlet of the larger tank. Is this an error or intention? If a single flow control is proposed only, it needs to be demonstrated that both tanks can achieve full storage capacity without the risk of out of manhole flooding in the network. • There is a concern about the depth of cover proposed over the smaller 146m³ attenuation tank. There appears to be only about 300 to 400mm of cover over the tank, which is way too little and this needs to be addressed. 	<p>designed so that both tanks can attenuate surface water in a 1 in 100yr storm (plus 20% allowance for climate Change) without causing an out of manhole flooding in the network. Attached in Appendix 1 are the Causeway Flow calculations demonstrating this.</p> <ul style="list-style-type: none"> • The invert and cover levels of the attenuation tank 1 have been revised. Attenuation tank 1 is a Stormtech SC-800 system and has been designed using the ADS design tool. The product specification notes that the minimum cover required for this product is 347mm, 570mm of cover to underside of road build up has been provided. Also refer to attenuation tank drawings: CST-BMD-00-ZZ-DR-C-1262.
<p>4. Parks, Biodiversity and Landscape</p>	
<p>The following items are addressed prior to lodgement of the application:</p> <p>a) Public open space — the playground should be relocated within the public open space to be further from the boundary with existing residential units to avoid undue disturbance to residents.</p>	<p>The playground has been relocated further west within the Public Open Space, further away from the existing residential units. please refer to the NMP drawings L1-103_1 and L1-103_2.</p>
<p>b) indicate how drainage facilities in the public open space are finished/presented in the landscape.</p>	<p>Please refer to NMP drawings L1-103_1 and L1-103_2.</p> <p>The drainage facilities are presented in the public open space as follows:</p> <ul style="list-style-type: none"> • Buried storm water attenuation tanks under lawn area with no tree planting above ref engineers drawings • Filter / French drains capture runoff from paths adjacent to soft landscape areas • General soft landscape area free draining percolation areas • Surface water over hardscape areas, streets to gullys
<p>c) A daylight and sunlight assessment is required to all of the proposed open spaces.</p>	<p>Please refer to the Sunlight and Daylight Assessment Report prepared by IN2 Engineering. The report assessed all of the amenity spaces which are confirmed to be comfortably in compliance with the BRE criteria to receive at least 2 hours of sunlight on March 21st, for at least 50% of the space, and the overall sunlit percentage is 90%, which is well over the compliance rate.</p>

d) The proposed perimeter tree screening to the existing extensive car park is supported. A detailed section through the boundary inclusive of proposed drainage and tree planting is required.	Please refer to section no Section 02, 06 and 07 drawing no. L1-801, L1-802 and L1-803 prepared by NMP in conjunction with Barrett Mahony.
e) Existing trees/shrubs to site boundary should be retained until after construction stage to retain their screening function.	Please refer to the Arborist Plans prepared by Arbeco.
f) A green roof plan indicating biodiverse planting is required to be submitted.	A biodiverse planting mix has been proposed for the green roofs. Please refer to NMP Landscape drawing L1-002 for further detail. Please also refer to the Biodiversity Enhancement Report by Altemar.
g) The letter by Altemar is noted. A biodiversity enhancement plan should also be submitted.	Please refer to the Biodiversity Enhancement Plan prepared by Altemar.
h) An Ecological Impact Assessment should be submitted.	Please refer to the Ecological Impact Assessment prepared by Altemar.
i) Details in relation to the future management and maintenance of the public open spaces on the site should be submitted.	Please refer to the Operational Management Plan prepared by Lioncor which provides details in relation to the future management and maintenance of the public open space.

7. Statement of Consistency (Planning Policy Review)

This section provides an overview of national, regional and local planning policy which are relevant to this development.

National and Regional Planning Policy

The key national and regional policies and guidelines (including Section 28 Guidelines) relevant to the proposed development are as follows:

- Project Ireland 2040 - National Planning Framework (2018) ("**NPF**");
- National Planning Framework First Revision (2025) ("**NPFFR**");
- Climate Action Plan (2025) ("**CAP 2025**");
- Transport Strategy for the Greater Dublin Area 2016 – 2035 ("**TSGDA**");
- Greater Dublin Area Transport Strategy 2022-2042 ("**GDATS**");
- Childcare Facilities Guidelines for Planning Authorities 2001 ("**CFG**");
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 ("**QHSC**");
- Regional Spatial and Economic Strategy 2019- 2031 ("**RSES**");
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) ("**Compact Settlement Guidelines**");
- Urban Design Manual: A Best Practice Guide 2009 ("**UDM**")
- Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023) ("**Apartment Guidelines**");
- Design Manual for Urban Roads and Streets (2013) ("**DMURS**");
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) ("**Planning System and Flood Risk Guidelines 2009**");
- Guidelines for Planning Authorities on Urban Development and Building Heights (2018) ("**Building Height Guidelines**");
- Dublin City Development Plan 2022-2028 ("**DCDP**")

Project Ireland 2040 Our Plan - National Planning Framework (2018)

The NPF is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland within the next 20 years. 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 planning aims to guide the delivery of this growth:

- 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.

Overall, the NPF seeks to avoid continued, untrammelled urban sprawl of our cities into greenfield areas. Compact Urban Growth is the NPF mantra, *“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 serviced zoned land, but it can also have a *“transformational difference”* to urban locations bringing new life and footfall to areas and contributing to the viability of services, shops and public transport, increasing the housing supply, and enabling 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).

The NPF enables a flexible approach to planning policies and standards requiring developments 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”*. Key National Policy Objectives (NPOs) outlined in the NPF which are directly relevant to this site and development proposal are set out below:

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 Dublin with good transport links to centres of high employment.
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 and generate more jobs and activity within existing cities, towns and villages, subject to</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>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 consistent with the spirit of 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 is placed at the forefront of this scheme</p> <p>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 145 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 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 in the Dublin City Council Development Plan 2022-2028

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 Government's 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, S4, 54a, 74, 83 and 83a serve the site. Routes 9, 15A and S4 are within c.300m of the subject site. The Bus Connects Routes S4 orbital service (300m from the subject site) and 74 radial serves (500m from the subject site) commenced in November 2023 provide excellent access for the 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 from 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 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.

National Planning Framework First Revision, April 2025

The *National Planning Framework (NPF)* remains the Government's high-level strategy for shaping Ireland's future growth and development to 2040, now updated to reflect significant demographic, environmental, and policy changes since its original 2018 publication. It anticipates that Ireland's population will grow by approximately one million people, reaching 6.1 million by 2040. The Eastern and Midland Region is projected to grow to nearly 3 million people. The revised NPF continues to set out National Strategic Outcomes (NSOs) and National Policy Objectives (NPOs) that guide development at regional and local levels. The Government completed the review of the NPF in April 2025 and has now adopted a revised NPF. We note the revised NPF contains ambitions to deliver

50,000 units per annum. The Revised NPF puts an increased emphasis on transit orientated development while retaining the importance of compact development generally.

As a strategic development framework, Ireland 2040 sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

Key National Policy Objectives which relate to this site within this first revision are set out below:

- *National Policy Objective 2*

The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined.

- *National Policy Objective 3*

Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million

- *National Policy Objective 4*

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

- *National Policy Objective 7*

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

- *National Policy Objective 8*

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

- *National Policy Objective 10*

Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.

- *National Policy Objective 11*

Planned growth at a settlement level shall be determined at development plan making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

- *National Policy Objective 12*

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

- *National Policy Objective 13*

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

- *National Policy Objective 17*

In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
 - Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and
 - A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.
- *National Policy Objective 22*

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

- *National Policy Objective 37*

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

- *National Policy Objective 38*

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

- *National Policy Objective 40*

Local planning, housing, health facilities and services, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

- *National Policy Objective 41*

Prioritise the alignment of targeted and planned population and employment growth with investment in:

- A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;
- The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key

enabler for housing development, thereby contributing to the development of sustainable communities;

- The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and
- Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.
- *National Policy Objective 42*

To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

- *National Policy Objective 43*

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

- *National Policy Objective 44*

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

- *National Policy Objective 45*

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

- *National Policy Objective 83*

Identify and strengthen the value of greenbelts and green and blue spaces at regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.

Evaluation of Consistency

The proposed development aligns with the objectives of the NPF First Revision by delivering compact growth within the existing settlement boundary, prioritising sustainable transport connections, and supporting a mix of housing types and community services.

The proposal provides increased residential density, high-quality design, and promotes active travel, consistent with National Policy Objectives promoting sustainable, integrated, and well-connected urban development.

Overall, the development of these lands is fully in accordance with the recommendations of the NPF.

CLIMATE ACTION PLAN 2025

The Climate Action Plan 2025 (CAP 2025) is the fourth annual update to Ireland's Climate Action Plan 2019 and the third to be prepared under the Climate Action and Low Carbon Development

(Amendment) Act 2021. It builds on the introduction of carbon budgets and sectoral emissions ceilings in Climate Action Plan 2023 and updated in CAP 24 and sets a course for Ireland's targets to halve emissions by 2030 and reach net-zero no later than 2050.

The publication notes for CAP 2025 set out that the new CAP should be read in conjunction with CAP 24 and therefore builds on the provisions of same, which the design team had regard to throughout the pre-application process and prior to CAP25 being published.

Under section 15 of the Climate Action and Low Carbon Development Act 2015, as amended by the 2021 Act, Planning Authorities and the Board are required in so far as practicable to perform their functions in a manner consistent with the most recent CAP.

The Climate Action Plan 2025 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

It will put Ireland on a more sustainable path; cut emissions; create a cleaner, greener economy and society; and protect us from the devastating consequences of climate change. It is a huge opportunity to create new jobs and grow businesses in areas like offshore wind; cutting-edge agriculture; and retrofitting, making our homes warmer and safer.

The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually to ensure alignment with our legally binding economy-wide carbon budgets and sectoral ceilings.

Evaluation of Consistency

The proposed development is consistent with the Climate Action Plan 2025, supporting the transition to a low-carbon, climate-resilient society. The scheme promotes compact growth, prioritises sustainable transport modes including walking and cycling, and delivers energy-efficient residential units and community infrastructure. These measures align with the CAP's goals to reduce emissions, enhance sustainability, and support a net-zero future, as required under the Climate Action and Low Carbon Development Act, as amended.

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.

Greater Dublin Area Transport Strategy 2022-2042

The Greater Dublin Area (GDA) Transport Strategy has, as its central objective, the promotion of efficient, effective and sustainable movement of people and goods, thereby helping to reduce modal share of car-based commuting. To achieve these principles, future developments must have transport as a key consideration in land use planning – integration of land use and transport to reduce the need to travel, reduce the distance travelled, reduce the time taken to travel, promote walking and cycling especially within development plans, protect the capacity of the strategic road network, ensure a significant reduction in share of trips taken by car, especially those trips which are shorter or commuter trips, and provide alternate transport modes in order to reduce the strain on the M50 as current increase in traffic is unsustainable.

The strategy also includes a number of measures to help guide development. The most relevant to the proposed development are Measure PLAN3 and Measure Plan 4:

Measure PLAN3

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 PLAN4

In accordance with the NPF and RSES, the NTA will support and prioritise 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 be supported in exceptional circumstances – on an evidence-based planned approach – where located on high capacity public transport routes 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 consolidate 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. The Parking Provision Report/ Residential Travel Plan demonstrates the proximity of site to public bus network which will ensure that future occupants of this development will have good access to public transport and are not reliant on private cars.

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

As set out in the Turley Associates Childcare Assessment, which applies the 2001 guidelines along with the Apartment Guidelines it confirms that the proposed childcare facility within this development is adequate for potential childcare spaces arising. The conclusion confirms that *“The demand for childcare arising from this development is, therefore, considered to be very low, comprising a demand for 3 to 5 no. childcare spaces in accordance with the Childcare Guidelines (2001) and the Apartment Guidelines (2023). Childcare facilities exist within the area, including eight facilities within 1km of the site and a total of 31 facilities within 2km of the site.*

Notwithstanding, a childcare facility is proposed to be provided as part of the development. This provides 210 sqm of internal space and 130 sqm of external space, which would support 75 children. The facility has been designed based on the Tusla Quality and Regulatory Framework (QRF) and the Universal Design Guidelines for ELC Settings. This provides in excess of the childcare demand estimated as part of this assessment. It therefore meets the needs of the development and a wider need beyond the development itself, a community creche.

On this basis, the development complies with planning policy at all levels.”

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 scheme will provide an appropriate mix of 1 and 2 bedroom apartments which will improve the housing mix available in the area.
“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,	The proposal provides communal open spaces, shared car and cycle parking areas, and bin stores to serve the

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.”	future residents of the scheme. All open spaces will be overlooked by adjoining residential blocks.
<p>Architecturally Appropriate</p> <p>“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>	<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>
<p>Accessible & Adaptable</p> <p>“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>	<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>
<p>Safe, Secure & Healthy</p> <p>“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, including access for service vehicles, should not compromise these objectives.”</p>	<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> <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,</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>

having regard to the nature of the development.”	A management company will be established to maintain and manage the areas of communal open space, parking and bin storage associated with the apartments.
Durable “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.	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.
Resource Efficient “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>The subject site is located in close proximity to public transport, education facilities, sports facilities, and retail services. There is a neighbourhood centre located 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.

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 Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES for the Eastern and Midland Region was adopted in 2019 and is a strategic plan and investment framework to shape the future development of this region to 2031. The vision for the region 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 will support the implementation of 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 identifies that the Dublin Metropolitan Area is *"to realise ambitious compact development targets at least 50% of all new homes within or contiguous to the existing built-up area in Dublin and at least 30% in other metropolitan settlements."* Dublin city and its suburbs 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.

Table 4.2 Settlement Hierarchy				
Settlement Typology	Description	Areas		
		Metropolitan	Core Region	Gateway Region
Dublin City and suburbs	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.	Dublin City and suburbs		

Figure 12: 'Settlement Hierarchy' Table 4.2 of Chapter 4 of the RSES 2019

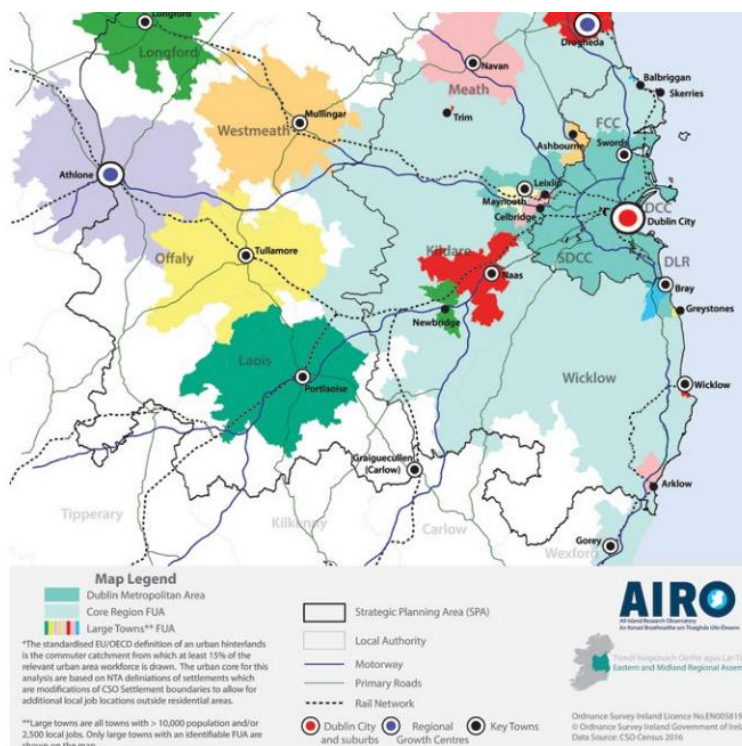


Figure 16: 'EMRA Functional Urban Areas, 2016' Figure 1.9 of Chapter 1 of the RSES 2019

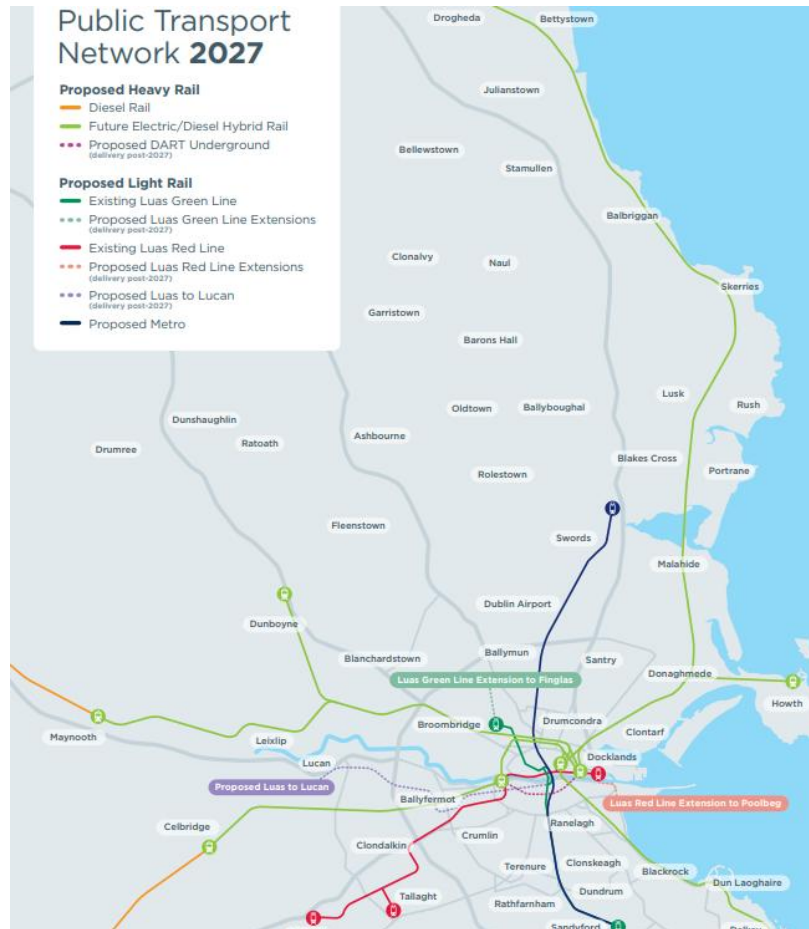


Figure 17 'Public Transport Network 2027', Figure 5.4 of Chapter 5 of the RSES

Section 4.4 of the RSES 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. To achieve this the Metropolitan Area Strategic Plan (“MASP”) identifies strategic residential and employment corridors along key public transport corridors, both existing and proposed.

RPO 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 City 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.”

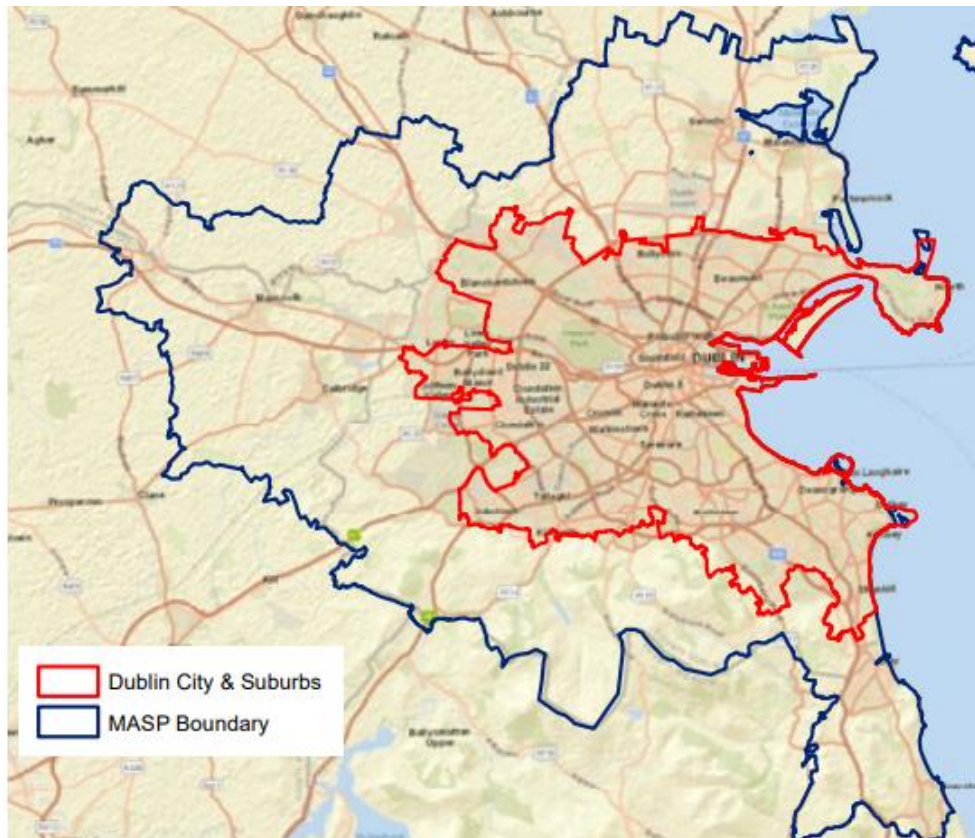


Figure 18: 'MASP Boundary Source', Figure 5.1 of Chapter 5 of the RSES 2019

The guiding principles for growth in the Dublin Metropolitan area are set out in section 5.3 RSES and include:

- *Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.*
- *Integrated Transport and Land use – To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.*
- *Metropolitan Scale Amenities – To enhance provision of regional parks and strategic Green Infrastructure, to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast, as part of the implementation of the National Transport Authorities' Cycle Network Plan for the Greater Dublin Area.*
- *Enhance co-ordination across local authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.*

RPO 5.3 States that future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.

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'13, 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities

RPO 5.4 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.

RPO 5.5: 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.



Figure 19 : 'Dublin Metropolitan Area Strategic Plan', Figure 5.2 of Chapter 5 of the RSES 2019

EVALUATION OF CONSISTENCY WITH RSES

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.

Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities, 2024

The Compact Settlement Guidelines 2024 set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Compact Settlement Guidelines 2024 will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this Planning Application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Section 1.3.2 of the Guidelines relating to Compact Growth state that *“priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens”*.

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Urban Neighbourhood given the site’s location within 500m from Bus Stops 2437 and 1090 both on Kimmage Road and the associated availability of high frequency bus routes.

*The ‘City – Urban Neighbourhoods’ category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that **residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.***

Section 3.4 of the Compact Settlement Guidelines 2024 provides further advice on *Refining Density* and includes a two step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies that *while densities within the ranges set out will be acceptable,*

planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3.

Table 3.8 (below) sets out definitions for terms used in the Guidelines to define accessibility, to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Policy and Objective	Response
3.1 and Table 3.1 It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.	<p>This site is within 500m of excellent existing bus services with further improvements to be delivered in the area via BusConnects. The site is therefore considered to be a High Capacity Public Transport Node or Interchange within a City – Urban Neighbourhood.</p> <p>The density appropriate to this site is identified as being in the range of 50uph to 250uph. Therefore, the proposed density of 116 uph net is considered appropriate to this accessible, urban location.</p>
4.1 It is a policy and objective of these Guidelines that planning authorities implement the	BMCE have confirmed that the proposed development is in accordance with DMURS.

principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.	Please refer to the DMURS Compliance Statement prepared by BMCE submitted as part of this application.
4.2 It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.	Please see the assessment in the table directly below this which confirms the development is in accordance with Section 4.4
5.1 It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.	Full details of the site's public open space and amenity strategies are detailed in the enclosed Landscape Masterplan and Design Report prepared by NMP. In line with this objective though 10% of the site is public open space. This is also in line with Section 15.8.6 which requires a minimum provision of 10% Public Open Space on sites zoned Z1 and Z10.

Section 4.4 Key Indicators of Quality Design and Placemaking Assessment

Key Indicators	Evaluation of consistency
Sustainable and Efficient Movement In order to meet the targets, set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport. Local authorities should plan for the development of well-connected neighbourhoods and a distribution of activities to ensure that day-to-day services and amenities are accessible within walking distance of homes and workplaces. In addition to sustainable travel objectives, this will ensure that settlements are vibrant, and when applied alongside the principles of Universal Design, will allow	<p>This proposed development provides new cycle and pedestrian routes within the development. The local region has many cycle lanes and designated paths for the use of cyclists along with the proposed developments plans to provide additional cycle infrastructure.</p> <p>The National Transport Authority in conjunction with DCC has proposals to upgrade the cycle network. Please refer to the Residential Travel Plan prepared by BMCE for further information regarding existing and proposed cyclist infrastructure.</p>

vulnerable users to move about and access services with ease.

The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.2 also refers):

(a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate.

(b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible.

(c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists.

(d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments.

The Design Manual for Urban Roads and Streets (DMURS) sets out statutory guidance and standards in relation to the design of individual streets and the use of traffic management and placemaking measures to manage traffic and promote safer and more vibrant streets (Section 2.3 refers). The application of DMURS in all new developments will be key to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements. Local Authorities should also consider preparing active travel plans or sustainable mobility plans that focus on

It is a site that is well located close to existing public transport and facilities within Kimmage and Terenure.

(a) This proposed development creates an attractive, highly permeable urban environment which provides new links through the development connecting to existing gateways.

(b) The proposal also has ease of access to existing local services. Please refer to the Social Infrastructure Audit prepared by Turley

(c) The proposal has been designed in accordance with DMURS to create street networks that feel safe to pedestrians and cyclists. Please refer to the DMURS Compliance Statement prepared by BMCE.

(d) The provision of a high ratio of cycle parking and a lower ratio of car parking will encourage a modal shift to active travel. The proposed car parking ratio is 0.57 and this is in line with the requirement to minimise car parking as set out in SPPR 3 and emerging trends for sustainable residential developments

The proposal is fully compliant with DMURS. Please refer to the DMURS Compliance Statement prepared by BMCE.

<p>improving ease of movement in established areas to important destinations such as schools, parks, shops and public transport. This can be of particular benefit where a new transport service or new destination such as a school is proposed</p>	
<p>Mix and Distribution of Uses</p> <p>These Guidelines promote a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of mixed use neighbourhoods. Ensuring that there is a good mix and distribution of activities around a hierarchy of centres has many benefits in terms of reducing the need to travel and creating active and vibrant places. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.3 also refers):</p> <p>(a) In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development.</p> <p>(b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved through the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres.</p> <p>(c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout.</p> <p>(d) In all urban areas, planning authorities should actively promote and support</p>	<p>The proposed development has responded to this policy by ensuring that there is a good mix of uses on the site. See below:</p> <p>(a) The proposed development provides a mix of uses including residential, creche, community and cultural uses and outdoor spaces including a playground and is also in proximity to a range of land uses, reducing the need to travel and creating a sustainable neighbourhood. The proposed scale of the development responds to the accessibility of the location.</p> <p>(b) The proposal provides residential, creche, community and cultural uses and outdoor spaces including a playground. The scheme uses urban enhancement tools and traffic management measures to create spaces that invite people to meet and mingle within the area.</p> <p>(c) the subject site is considered to be a central location and therefore the mix of uses caters for this.</p> <p>(d) This proposal, for the development of underused residentially zoned land and is wholly compliant with this policy.</p> <p>(e) The subject site is located in close proximity to existing public transport services.</p> <p>(f) The unit mix will provide a new smaller type of housing in an area which is predominately larger two storey, low density family homes.</p>

<p>opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access).</p> <p>(e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport.</p> <p>(f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.</p>	
<p>Green and Blue Infrastructure</p> <p>Green and Blue Infrastructure (GBI) is a strategically planned network of natural and seminatural areas designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity. Ecosystem services include water purification, enhancing air quality, space for recreation and climate mitigation and adaption. In settlements, GBI includes features such as rivers and canals, coastline and coastal habitats, green spaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans. Development plans should include (or be informed by) a Green and Blue Infrastructure Strategy and include objectives for the conservation, restoration and enhancement of natural assets and GBI networks. These objectives can be refined</p>	<p>Noted.</p> <p>This proposal will enhance the area around by providing additional planting enhancing the existing area, restoring and improving the ecology and biodiversity of this area through the provision of native planting Please refer to the Landscaping Design Report prepared by NMP and the Biodiversity Enhancement Plan prepared by Altermar.</p> <p>SuDS measures are included throughout the development as set out in the BMCE Consulting Engineers documents as well as within NMP Landscape Rationale.</p>

further in local statutory plans and guidance documents in response to local circumstances.

The following key principles should be applied in the preparation of local plans and in the preparation and consideration of individual planning applications, (Figure 4.4 also refers):

(a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts.

(b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below.

(c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes.

(d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.

Public Open Space

All statutory development plans should include a strategy for the provision of an integrated hierarchy of public open spaces and corridors across the plan area to meet the needs of the planned population. The availability of accessible and high quality public open spaces within all settlements that are part of a wider GBI network will be important in creating sustainable settlements. This should include a hierarchy of multifunctional public open spaces

Please see the report by NMP Landscape Architects. This clearly demonstrates the integration of the proposed landscape with the existing area. It enhances the existing features on the site, while providing additional planting to create more attractive and diverse area to promote the biodiversity of the area.

The proposal will result in the delivery of a new public park within this area.

and corridors that are accessible and provide for the recreational needs of the planned population, while also creating space for nature and ecosystem services.

The public open space strategy in the development plan should include objectives relating to the provision of:

(a) Regional, district and local level public parks and greenways. These are generally publicly owned and managed parks e.g. by a local authority or public body such as the OPW or Waterways Ireland.

(b) Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development.

The objectives of the development plan public open space strategy should be informed by the objectives of the RSEs and any regional GBI strategy. The form, size and distribution of new public open spaces should be plan led and take account of open space provision within the area and broader nature conservation and environmental considerations.

While there is no set standard of open space provision per settlement in Ireland, it is recommended that opportunities to enhance the overall quantum of public open space and to restore and enhance nature and biodiversity within settlements is harnessed where opportunities arise, for example, through regeneration or urban enhancement projects and in new development areas. The level of provision should take account of the needs of the planned population, protected zones, landscape character and statutory obligations to protect certain habitats and biodiversity. Ideally, all residents within a settlement will have access to a multi-functional public open space within walking distance of their home.

Public open spaces should be designed to cater for a range of active and passive recreational needs (including play, physical activity, active travel, cultural uses and community gardens and allotments, as appropriate to the context) and to conserve and restore nature and biodiversity. It

The proposed public open space is in full compliance with the requirements of the DCDP.

Please refer to the AA Screening prepared by Altamar which concludes that *"Based on best scientific evidence, the proposed development individually or in combination with other plans or projects will have no likely significant effects on the conservation objectives of any European site. No specific mitigation is required to prevent impacts on European sites."*

<p>will be necessary to balance improved access to natural assets with the need to protect the environment as increased levels of tourism, sports and leisure can impact negatively on nature and biodiversity. In addition, the provision of public open spaces should not result in any direct or indirect adverse effects on the integrity of European Sites.</p> <p>Chapter 5 includes minimum requirements for the provision of open space in new residential developments, based on the net site area</p>	
<p>Responsive Built Form</p> <p>Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces. This is a key element in ensuring the creation of attractive and well-designed settlements. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.5 also refers):</p> <p>(a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points.</p> <p>(b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces).</p> <p>(c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible.</p> <p>(d) Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages.</p> <p>(e) New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage.</p> <p>(f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable</p>	<p>Noted.</p> <p>The proposed development, through the use of varied building heights and forms provides clear legibility to the development.</p> <p>It also reflects the established pattern of development and provides a transition from the existing lower density two storey housing, via the proposed 3 storey sections on the north of each block stepping up to the 5 storeys on the southern boundary.</p> <p>The proposed development will open up the site, replacing an existing inaccessible space with a new attractive urban apartment block.</p> <p>The buildings due to their design not only provide a well defined edge to the new spaces, but also ensure that all open spaces are overlooked.</p> <p>This is considered to be an exemplar development showcasing contemporary architecture.</p> <p>A varied, high quality palette is proposed for the development which creates a distinctive attractive development within the area.</p>

The Compact Settlement Guidelines 2024 outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing:

SPPR 1 – Separation Distances	EVALUATION OF CONSISTENCY
<p>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p> <p>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</p>	<p>The proposed development complies with this policy. The proposed blocks and residential units have separation distances greater than 16 metres between opposing windows.</p> <p>Please refer to the Site Layout Plan prepared by BKD for further details.</p>
SPPR 2 – Private Open Spaces for Houses	EVALUATION OF CONSISTENCY
<p>It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:</p> <p>1 bed house: 20 sq.m</p> <p>2 bed house: 30 sq.m</p> <p>3 bed house: 40 sq.m</p> <p>4 bed + house: 50 sq.m</p> <p>A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space</p>	<p>The proposed houses all comply with the minimum private open space standards as set out in the HQA.</p> <p>Please refer to the Housing Quality Assessment prepared by BKD for further details.</p>

will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.	
SPPR 3 – Car Parking	EVALUATION OF CONSISTENCY
<p>It is a specific planning policy requirement of these Guidelines that:</p> <p>(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.</p> <p>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</p>	<p>In line with this policy which states that the maximum rate of car parking provision for residential developments within accessible locations, is no more than 1 space per dwelling, the proposed development will provide 83 no. spaces for the 145 residential units equating to c. 0.57 spaces per unit. As set out in the engineering reports, this is considered acceptable due to the site's proximity to a high quality public transport corridor.</p>
SPPR 4 – Cycle Parking and Storage	EVALUATION OF CONSISTENCY
<p>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:</p> <p>(i) Quantity – in the case of residential units that do not have ground level open space or</p>	<p>The proposal provides 465 no. bike parking spaces comprising of long term spaces and short term spaces.</p> <p>The storage areas are safe, secure and overlooked.</p> <p>This is fully compliant with the policy.</p>

have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.

(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

Evaluation of Consistency

The proposed development is considered an Accessible Location as outlined in the table above, due to the site's proximity (c.300m) to a high quality public transport corridor (Route number 9 and S4) along Kimmage Road West and is considered in accordance with the criteria relating to car parking, separation distances, density, private open space and cycle storage for such locations.

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

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

Urban Design Manual: A Best Practice Guide (2009)

The Urban Design Manual is the accompanied the now revoked Sustainable Residential Development in Urban Areas 2009 Guidelines. A revised Design Guidelines is due to be published to support the Compact Settlement Guidelines discussed above. These have not yet been completed, until this guidance is received, it is considered appropriate to continue to use the Urban Design Manual. This Guide 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>

	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.
Appropriate responses are made to the nature of specific boundary conditions.	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.
2. Connections – How well connected is the new development	
There are attractive routes in and out for pedestrians and cyclists.	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.
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, S4, 15A, 54, 74 and 83/83A. 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, 57.3% 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. The proposed layout adapts to the site boundaries and existing buildings surrounding the site. The proposed

	<p>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 one to five 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, through and from the site.</p> <p>The height and design of the buildings will result in an attractive, legible route through 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.	<p>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.</p>
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.	<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>
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	<p>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.</p>
The streets are designed as places instead of roads for cars, helping to create a hierarchy of	<p>A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at</p>

space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	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.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2023

The Apartment Guidelines 2023 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 guidelines provide for updated guidance on apartment developments in response to the NPF and Rebuilding Ireland. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2020.

In relation to appropriate locations for apartment developments and increased density the Guidelines identify 3 urban location types. *“Central and/or Accessible Urban Locations”* are identified as those which can accommodate large scale, and higher density developments and wholly comprise apartments. Such locations are within 15 mins walk of significant employment locations (which include hospitals and third level institutions) and 10 mins walk of Luas, DART and 5 mins walk of high frequency bus services.

The subject site represents an *“Central and /or Accessible Urban Location”* in this regard due to its proximity to Bus Stops being served by high frequency bus routes number 9 and S4 on Kimmage Road West and the associated availability of high frequency bus routes, including the service capacity associated the proposed Bus Corridor Route.

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to.

SPPR 1	EVALUATION OF CONSISTENCY
Housing 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).	<p>The proposed development provides 145 no. apartments. Of which, 70(48%) are 1 beds, and 75 (51%) are 2 beds.</p> <p>It is therefore compliant with the stated housing mix in the guidelines.</p>
SPPR 2	EVALUATION OF CONSISTENCY
<p>For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</p> <p>- Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;</p>	N/A. SPP2 does not apply to the proposed development as it is not a refurbishment scheme or an urban infill scheme on a site of up to 0.25ha.

<p>- 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;</p> <p>- For schemes of 50 or more units, SPPR 1 shall apply to the entire development;</p> <p>All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development</p>	
SPPR 3	EVALUATION OF CONSISTENCY
<p>Minimum apartment floor areas:</p> <p>studio apartments (1 person) 37sqm</p> <p>1 bedroom apartment (2 persons) 45sqm</p> <p>2 bedroom apartment (4 persons) 73sqm</p> <p>3 bedroom apartment (5 persons) 90sqm</p>	<p>The current proposal achieves these standards as set out in the Housing Quality Assessment.</p>
SPPR 4	EVALUATION OF CONSISTENCY
<p>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following apply</p> <p>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</p>	<p>The current proposal proposes 57.3% dual aspect units which is higher than the minimum required Please refer to the HQA prepared by BKD Architects for further information.</p>
SPPR 5	EVALUATION OF CONSISTENCY

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality	The proposed building achieves this standard within each block.
SPPR 6	EVALUATION OF CONSISTENCY
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 12 or less than 12 apartment per core in accordance with SPPR6.

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 465 no. secure, readily accessible cycle parking spaces have been provided and designed into this scheme.
Section 4.21 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. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity. Section 4.22 These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes	In line with this policy, the proposed development includes 89 no. car parking spaces (a ratio of 0.57 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.

walking distance of high frequency (min 10 minute peak hour frequency) bus services.	
<p>Appendix 1 out sets out the following minimum overall apartment floor areas:</p> <ul style="list-style-type: none"> • Studio: 37sqm • One bed: 45sqm • Two bed (3 person): 63sqm • Two bed (4 person): 73sqm • Three bed: 90sqm 	<p>The proposed units are fully in compliance with these standards.</p> <p>The one bed units range in size from c.47sqm to c.58sqm with aggregate bedroom areas meeting the criteria, along with the appropriate storage space.</p> <p>The two bed units range in size from c.75sqm to c.86sqm, with aggregate bedroom areas meeting the criteria as well as the storage areas.</p> <p>Please see the HQA prepared by BKD Architects for further details.</p>
<p>Appendix 1 provides the following aggregate bedroom floor areas:</p> <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 	
<p>Appendix 1 provides the following storage space requirements:</p> <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>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>As shown on the drawings, each apartment is provided with a balcony/terrace in line with these standards.</p> <p>Based on these communal open space requirements the proposal requires c.875 sqm communal open space. The proposal includes c. 1,860sqm communal open space which is over double the quantum required.</p>

EVALUATION OF CONSISTENCY with Apartment Guidelines

The proposed development is considered an Accessible 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.

DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The 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.

EVALUATION OF CONSISTENCY

The proposed design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of a low parking actively promotes a modal shift to alternative forms of transport while also creating a high quality public open space in the area. This scheme prioritises pedestrians and cyclists through the development. Permeability for cyclists and pedestrians is therefore prioritised. A DMURS Statement prepared by BMCE engineers is included with this submission.

GUIDELINES FOR PLANNING AUTHORITIES ON 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. The sequential approach divides new developments into three categories which are as follows:

- Highly Vulnerable Development (i.e. power stations, residential)
- Less Vulnerable Development (i.e. retail, leisure)
- Water-compatible Development (i.e. car parking, recreational space)

The proposed residential development comes under the heading of Highly Vulnerable Development.

Where a planning authority is considering proposals for new development in areas at a high or moderate risk of flooding that include types of development that are vulnerable to flooding and that would generally be inappropriate as set out in Table 3.2, the planning authority must be satisfied that the development satisfies all of the criteria of the Justification Test as it applies to development management outlined in Box 5.1 below.

**Box 5.1 Justification Test for development management
(to be submitted by the applicant)**

When considering proposals for development, which may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2, the following criteria must be satisfied:

1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines.
2. The proposal has been subject to an appropriate flood risk assessment that demonstrates:
 - (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk;
 - (ii) The development proposal includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible;
 - (iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access; and
 - (iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.

The acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context.

Note: See section 5.27 in relation to major development on zoned lands where sequential approach has not been applied in the operative development plan.

Refer to section 5.28 in relation to minor and infill developments.

Figure 20 Justification Test Criteria - Planning System and Flood Risk Management

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 concludes as follows:

"This report outlines the findings of the SSFRA carried out for the mixed use, primarily residential development at Carlisle, Kimmage, Dublin 12. This SSFRA was carried out in accordance with the DEHLG guidelines for Planning 2009 and The Planning and Development Act 2000, and with reference to the DCC Development Plan 2022-2028 and SDCC Development Plan 2022-2028.

Based on available and recorded information, the site of the proposed residential blocks itself has not been subject to flooding in recent history. Adjacent areas, including part of the existing access road, however, have experienced flooding. However, the flood depths on the access road would not impinge access and egress for emergency service vehicles.

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

The risk of fluvial flooding to the residential buildings and surrounding footpaths and roads is considered low as these areas lie outside the 0.1% AEP event. Fluvial flooding to the existing access road will not impact access and egress of emergency service vehicles.

The proposed Poddle Flood Alleviation Scheme will negate the risk of fluvial flooding on the existing access road and Kimmage Road west in the 1% AEP event.

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 the development.

Based on the flood risk identification in Stage 1, the existing access road serving the proposed development falls in Flood Zone A & B. A justification test has been applied and the proposed development is deemed 'Appropriate' in accordance with the guidelines of the OPW's publication."

Urban Development and Building Heights: Guidelines For Planning Authorities, 2018

The Building Height Guidelines 2018 set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the NPF. There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.

SPPR 1 of the Guidelines state the following:

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.

The imposition of height or numerical restriction at the subject site would therefore be contrary to Specific Planning Policy Requirement 1 which notes that blanket numerical limitations on building height shall not be provided for through statutory plans.

Section 3.1 of the Guidelines go on to state:

In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these 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 S4 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 S4 runs from Liffey Valley to UCD which allows residents to access UCD and Liffey Valley 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>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 5 storeys.</p> <p>Block 1 is located furthest to the west. It is 3 storeys at the northern end rising to 4 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 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 5 storeys adjacent to the less sensitive southern boundary and step gradually down to the north, to 3 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 3 storey on the northern end rising to 4 and block 5 is 4storey 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>(currently closed) located to the south east of the subject site.</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	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	<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 where possible and provide additional planting across the site.</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 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 development that steps appropriate to meet the neighbouring properties.</p>
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 building footprint has been stepped to provide a more visually interesting development when viewed from the east.</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).	<p>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. The proposal is also fully in line with the 2009 guidelines on flood risk management. Full details of this assessment are in the Site-Specific Flood Risk Assessment prepared by Barrett Mahony Engineers and submitted with this application.</p>

<p>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>	<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>
<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>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 70 no. 1-bed apartments and 75 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.</p>
<p>At the scale of site/building</p>	
<p>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</p>	<p>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.</p>
<p>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'</p> <p>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</p>	<p>IN2 Engineering Consultants have completed a Sunlight Daylight analysis confirming the impact is acceptable.</p> <p>The report assessed all of the amenity spaces which are confirmed to be comfortably in compliance with the BRE criteria to receive at least 2 hours of sunlight on March 21st, for at least 50% of the space, and the overall sunlit percentage is 90%, which is well over the compliance rate.</p> <p>A daylight analysis has been undertaken for the kitchen/living/dining (KLD), living room and bedroom spaces in assessed units (Apartment and Duplex). All units were assessed for the Spatial Daylight Autonomy (SDA)</p>

<p>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.</p>	<p>methodology as detailed in the BRE Guide. A very high compliance rate of 98% of the rooms, were found to be compliant for BRE Guide recommendation and detailed results are presented in Appendix C of IN2's report. For any unit not achieving minimum compliance for SDA, these have been identified, and compensatory measures have been provided such as daylight adjacency, dual aspect units, unit sizes above the minimum sqm and an over provision of communal open space.</p> <p>In summary, the report prepared by IN2 confirms that best practice Daylight and Sunlight availability has been ensured for the proposed development, with no impact on the existing neighbouring environment.</p>
Specific Assessments	
<p>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.</p>	<p>IN2 have completed a full Microclimatic Wind Analysis submitted as part of this application. The report concludes that <i>the wind conditions at the ground level were predicted to be comfortable, with the majority of the area deemed suitable for "Pedestrian Standing" or better. The addition of the proposed landscaping to the analysis allowed for additional sheltering, improving predicted conditions for the occupants. All balconies were determined to be well sheltered, providing good conditions for resident usage. The majority of the podium area was predicted to be comfortable, but some areas of acceleration were identified along the access stairways between Blocks 1 and 2, and Blocks 2 and 3. To further shelter these spaces, the proposed landscaping was assessed. This was determined to provide improved conditions and minimise the region of acceleration. Overall, the proposed development was determined to not negatively impact its receiving environment, and all amenity spaces were predicted to be comfortable with regards to wind microclimate.</i></p>
<p>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.</p>	<p>Please refer to the Ecological Impact Assessment and Appropriate Assessment Screening Report prepared by Altamar.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>The proposal will not alter the existing telecommunication channels in the area.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>	<p>The subject site is not within a flight path and is therefore not expected to impact air navigation.</p>
<p>An urban design statement including, as appropriate, impact on the historic built environment</p>	<p>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.</p>

	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. Please refer to the Ecological Impact Assessment and Appropriate Assessment Screening Report prepared by Altamar.

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, UCD, 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>SPPR 2</p> <p>In driving general increases in building heights, planning authorities shall also ensure 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>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>SPPR 3</p> <p>It is a specific planning policy requirement that where;</p> <p>(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and</p> <p>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</p>	<p>The proposal is in accordance with the Development Management Criteria as set out in the table above and in the development plan therefore the application of SPPR3 is not necessary in this instance.</p> <p>This proposal is in accordance with the national, regional, and development plan guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p>

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.

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 principally ranging in height from 1 to 5 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 DCC and ABP also granted permission for 6 storeys under the more recent LRD 6018/22-S3 and ABP316176-23 and therefore the principle of increased height has been established on this site.

Local Planning Policy

Dublin City Development Plan 2022-2028

The site is zoned as *'Sustainable Residential Neighbourhoods – Zone Z1'* with the objective *"To protect, provide and improve residential amenities."* The access road into the site zoning has changed under the current Development Plan. It has changed from Z9 zoning to Z10 zoning which allows for *Inner Suburban and Inner City Sustainable Mixed – Uses* with the objective to *"To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses."*



PRIMARY LAND USE ZONING CATEGORIES⁴

Zone Z1	Sustainable Residential Neighbourhoods	
Zone Z9	Amenity /Open Space Lands /Green Network	
Zone Z10	Inner Suburban and Inner City Sustainable Mixed-Uses	

Figure 21: Map G of the Dublin City Council Development Plan 2022-2028

The proposed development is for residential use is a permissible use in this site zoned Z1 and under Z10 under the current Development Plan. The below table confirms compliance with the development plan.

Sustainable Residential Neighbourhoods – Zone Z1

Land-Use Zoning Objective Z1: To protect, provide and improve residential amenities. 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.

Chapter 5: Quality Housing and Sustainable Neighbourhoods, which deals with policies and objectives for residential development, making good neighbourhoods and standards, respectively,

should be consulted to inform any proposed residential development (see also Chapter 15: Development Standards).

In order to achieve a sustainable tenure mix in neighbourhoods, the Build to Rent residential typology is predominantly in the open for consideration category.

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.

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 and recreational uses, 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-licence, 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.

Inner Suburban and Inner City Sustainable Mixed-Uses – Zone Z10

Land-Use Zoning Objective Z10: To consolidate and facilitate the development of inner city and inner suburban sites for mixed-uses.

The purpose of this zoning is to promote mixed-use in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The concept of mixed-use will be central to the development or redevelopment of these sites and mono uses, either all residential or all employment/office use, shall not generally be permitted.

In order to ensure that a mixed-use philosophy is adhered to on Z10 zoned lands, the focus will be on delivering a mix of residential and commercial uses. There will be a requirement that a range of 30% to 70% of the area of Z10 zoned lands can be given to one particular use, with the remaining portion of the lands to be given over to another use or uses (e.g residential or office/employment). For very small sites, typically less than 0.5ha, flexibility on mix requirement may be considered on a case-by-case basis, where it can be demonstrated that the proposal would not result in an undue concentration of one particular land-use on the Z10 landholding as a whole.

The primary uses supported in this zone are residential, office and retail, with ancillary uses also facilitated where they deliver on the overall zoning objective.

There will be a requirement that for any significant scheme (on Z10 zoned lands greater than 0.5ha in size) seeking to increase densities and/or height, a masterplan is prepared (see also Appendix 3: Achieving Sustainable Compact Growth). The requirement to prepare a masterplan in respect of future development will also specifically apply to Z10 zoned lands at Malahide Road, Harmonstown Road, Goldenbridge Industrial Estate, 110-114 Cork Street, Glenview Industrial Estate and Brickfield House/ Sunshine Estate

Z10 – Permissible Uses

Amusement/leisure complex, assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café/ tearoom, **childcare facility**, civic offices, civic and amenity/recycling centre, community facility, conference centre, craft centre/craft shop, creative and artistic enterprises and uses, **cultural/recreational building and uses**, cultural, delicatessen, education, embassy office, embassy residential, enterprise centre, financial institution, guesthouse, halting site, homebased economic activity, hostel (tourist), hotel, internet café/call centre, live-work units, media-associated uses, medical and related consultants, mobility hub, motor sales showroom, off-licence, off-licence (part), office, open space, place of public worship, primary health care centre, public house, public service installation, **residential**, restaurant, shop (local), shop (neighbourhood), sports facility and recreational uses, training centre, veterinary surgery.

Z10 – Open for Consideration Uses

Advertisement and advertising structures, betting office, boarding kennel, Build to Rent residential, car park, car trading, funeral home, garage (motor repair/ service), garden centre/ plant nursey, household fuel depot, industry (light), laundromat, nightclub, office based industry, outdoor poster advertising, petrol station, pigeon loft, postal hotel/motel, science and technology-based industry, student accommodation, take-away, transport depot, warehousing (retail/non-food)/retail park, wholesale outlet

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Policy	Evaluation of Consistency
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.	The proposed development will provide additional housing on this site within the existing built-up area of Kimmage/ Terenure in Dublin City. This is in line with all regional and national policies.
QHSN6 Urban Consolidation 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.	The proposed development will provide new apartments at this suburban site in the established area of Kimmage/ Terenure, in close proximity to existing services and public transport options. The site is current vacant and fenced off. This will bring a redundant site into active use providing much needed residential accommodation.
QHSN9 Active Land Management 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	It is in line with the consolidation of the urban area and active land management policies. The proposed net density of 116 uph is higher than the existing low density, two storey

<p>at key locations including regeneration areas, vacant sites and underutilised sites.</p>	<p>suburban residential development in the surrounding area. However, the proposed density is in line with the DCDP which seeks to achieve a density within the range of 60-120 uph in 'Outer Suburbs'. Please refer to the assessment of 'Appendix 3, Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density, and Scale' from the DCC Development Plan, included in the statement of consistency later in this document.</p>
<p>QHSN10 Urban Density 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>QHSN11 15-Minute City 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>QHSN12 Neighbourhood Development 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 communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • 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; 	<p>The proposed development has been carefully designed to align with the principles set out under Policy QHSN12. It seeks to contribute positively to the quality of the built environment while supporting public health, wellbeing, and community cohesion. Specifically, the proposal will:</p> <ul style="list-style-type: none"> • Builds on the local character by incorporating high-quality materials and finishes that reflect the surrounding built form, while also contributing a contemporary design that strengthens visual interest and urban identity; • Support active lifestyles by providing open space and good pedestrian connections; • Encourage sustainable and low carbon transport modes through the provision of secure bike storage and good connectivity to existing public transport routes. • Promotes sustainable building design, targeting high energy performance, efficient layouts, and the use of modern construction methods and renewable materials; • Caters for all age groups by providing 1 and 2 bed units in an area dominated by larger homes. In particular the scheme

<ul style="list-style-type: none"> • 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)'; <p>are designed to promote safety and security and avoid anti-social behaviour</p>	<p>includes design features for older people to maximise quality of life through the provision of shared spaces;</p> <ul style="list-style-type: none"> • The scheme has had regard to the Healthy Placemaking and Integration of Land Use and Transport as set out in the RSES, the Sustainable Residential Development in Urban Areas, and the Design Manual for Urban Roads and Streets.
<p>QHSN13 Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025</p> <ul style="list-style-type: none"> • To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long-term vision of improving the physical and mental health and well-being of the population at all stages of life. 	<p>The proposed development supports the objectives of the Healthy Dublin City Framework and the Healthy Ireland Framework 2019–2025 by contributing to a healthier built environment that promotes physical and mental well-being for residents across all life stages. The scheme achieves this through the following key features: Provision of high quality secure homes, promotion of active lifestyles through the provision of open spaces, universally designed spaces and providing a compact urban form encouraging walking and cycling, fostering patterns of daily movement.</p>
<p>QHSN14 High Quality Living Environment</p> <p>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 includes a range of facilities which will not only benefit the future residents of the development but also the wider community. These include a public open space, cultural facility and creche.</p>
<p>QHSN16 Accessible Built Environment</p> <p>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 supports the provision of high-quality living environment to both its residents and for the wider area by providing accessible public open space close to existing local facilities.</p>
<p>QHSN17 Sustainable Neighbourhoods</p>	

<p>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>The proposed development has been carefully designed to respond to the existing built-up area surrounding the site. The proposal includes both communal and public open spaces that are accessible and offer high quality amenity space.</p>
<p>QHSN18 Needs of an Ageing Population 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 2019.</p>	<p>The space is designed to have appropriate level access, gentle gradients and lifts where appropriate.</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>QHSN21 Gated Residential Development 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>QHSN22 Adaptable and Flexible Housing 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 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>All of the apartments meet or exceed the minimum standards as outlined within the Apartment Guidelines, 2023</p> <p>The units are designed to be suitable for older people/mobility impaired people and people with disabilities.</p> <p>Please see the Universal Design Report by BKD Architects.</p>
<p>QHSN34 Social, Affordable Purchase and Cost Rental Housing 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 DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.</p>	<p>Please refer to the Part V pack submitted as part of this application.</p>
<p>QHSN36 High Quality Apartment Development 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</p>	<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>

infrastructure and other support facilities are available in the neighbourhood.	
QHSN37 Houses and Apartments 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.	The proposed development will provide Part V social housing suitable for serving families, individuals, couples and empty nesters. Each of the proposed units either meet or exceed the minimum standards in the Apartment Guidelines 2023.
QHSN38 Housing and Apartment Mix 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.	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.
QHSN39 Management 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 2011 and the Property Services (Regulation) Act 2011.	All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up keep.
QHSN47 High Quality Neighbourhood and Community Facilities 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>A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site within the vicinity. The provision of additional population will support the vitality and vibrancy of these businesses.</p> <p>The proposed development will also provide additional facilities in the form of community, culture and arts space.</p> <p>It will also provide for a new attractive public realm and high quality communal and public amenity space.</p>
QHSN55 Childcare Facilities To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision	A creche c.210sqm (20 spaces) and 130sqm of outdoor space is included as part of this development in compliance with the Dublin City Development Plan as demonstrated in the Childcare Assessment prepared by Turley submitted as part of this application.

and location is in keeping with areas of population and employment growth.

Chapter 12: Culture

Policy	Evaluation of Consistency
<p>CUO25 SDRAs and large Scale Developments</p> <p>All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum 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 base to justify the 5% going to one sector.</p>	<p>Please refer to the Cultural Infrastructure Assessment prepared by Turley submitted as part of this application. The proposed development provides 813sqm (5.6% of the total gross floor area) of Cultural space at the ground floors of Blocks 4 and 5. The proposal includes 10 no. artists' studios and shared kitchen and amenity spaces. Please refer to 'Proposed Level 00 Ground Floor Plan' for floor plans of the proposed cultural space. This fully meets the requirements of Policy CUO25 of the Dublin City Development Plan.</p> <p>On the basis of the existing offer of community/youth facilities (3 no.) and a library (1 no.) within the 750m study area and additional facilities within 1km (2 community/youth centres), it is considered on balance that the 5% Policy CUO25 provision should be weighted towards the provision of the cultural space which provides only 2 facilities within 750m area, and particularly due to the lack of provision of cultural workspace in the area, and demand across the city it is suggested that this 100% cultural use is acceptable.</p> <p>In addition to this, a creche is included within the proposed development. This will provide a community facility for the wider area in addition to the proposed cultural space.</p> <p>Please see the Turley's Reports: Social Infrastructure Audit and Cultural Infrastructure Assessment which support this approach.</p>

Chapter 15: Development Standards

Policy	Evaluation of Consistency
15.4 Key Design Principles	
<p>15.4.1 Healthy Placemaking</p> <p>All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-</p>	<p>The proposed development is located in close proximity to a high-quality Dublin Bus public transport corridor.</p> <p>Kimmage and Terenure are a well-established urban village which consists of a mixed-use environment. The proposed development further enhances the urban village by offering a mix of apartments.</p>

use environments in line with the principles of the 15 minute city	The provision of cycle parking within the scheme promotes a modal shift to active travel methods such as walking and cycling.
15.4.2 Architectural Design Quality Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.	The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm.
15.4.4 Inclusivity and Accessibility Development proposals, including all new large scale developments..... must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.	The proposed development is designed to be accessible to all. Please refer to the Architectural Design Statement prepared by BKD which includes a section of Universal Design.
15.4.5 Safe and Secure Design All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).	The proposed development has been designed with reference to the DEHLG's <i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities</i> (2007), specifically the principles outlined in 'Design for Safety and Security'. The layout promotes natural surveillance through the orientation of dwellings towards the open spaces, clearly defines public and private realms to foster a sense of ownership, and incorporates secure boundary treatments. Pedestrian routes are direct, well-overlooked and appropriately lit, while car parking is designed to be both convenient and visible, thereby enhancing passive supervision and contributing to a safe and secure living environment.
15.5.4 Height Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.	The proposed development ranges in height from 3 to 5 storeys, the three storey is adjacent to the nearest two storey elements, while the taller buildings are to the south adjacent to the less sensitive, larger existing buildings. Please refer to the statement of consistency with Appendix 3 Table 3: 'Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale', further on in this report.
15.5.5 Density New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood.	The proposed density is 116 uph. The proposed plot ratio is 1.2.:1 and the site coverage is 43.1%. This is in line with Appendix 3 Table 3: 'Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale'.
15.5.6 Plot Ratio and Site Coverage Appendix 3, Table 2 provides indicative plot ratio and site coverage standards.	

Area	Indicative Plot Ratio	Indicative Site Coverage	
Central Area	2.5-3.0	60-90%	
Regeneration Area	1.5-3.0	50-60%	
Conservation Area	1.5-2.0	45-50%	
Outer Employment and Residential Area	1.0-2.5	45-60%	
15.5.7 Materials and Finishes All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.			Please see the Architecture Elevations demonstrating high quality low maintenance materials.
15.5.8 Architectural Design Statements			Please see the Architectural Design Statement by BKD
15.5.9 Models and Photomontages			Please see the verified views by Visual Labs.
15.8 Residential Development			
15.8.1 Quality/Making Sustainable Neighbourhoods Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including ‘Quality Housing for Sustainable Communities: Design Guidelines’ (2007), ‘Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities’ (2009) and accompanying ‘Urban Design Manual (2010)’, Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).			The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.
15.8.2 Community and Social Audit 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.			
15.8.3 Schools 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.			
15.8.4 Childcare In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be			A creche c. 210 sqm (20 childcare spaces) and an external space of c.130sqm will be provided at the ground floor of block 4.

provided in all new mixed use and residential schemes.																
15.8.6 Public Open Space Table 15-4: Public Open Space Requirements for Residential Development <table><tr><th>Landuse / Zoning</th><th>Requirement (minimum)</th></tr><tr><td>Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)</td><td>10%</td></tr><tr><td>Residential development (Z12) (Z15)</td><td>25%</td></tr></table>	Landuse / Zoning	Requirement (minimum)	Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%	Residential development (Z12) (Z15)	25%	In line with this requirement 10% Public Open Space will be provided.									
Landuse / Zoning	Requirement (minimum)															
Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%															
Residential development (Z12) (Z15)	25%															
15.8.8 Play Infrastructure 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	Please see the NMP Pack. A playground is being provided to the south east of the subject site adjacent to the Nora Dunne Gallery.															
15.8.11 Management Companies/Taking in Charge	The proposed development will not be taken in charge.															
15.9 Apartment Standards																
15.9.1 Unit Mix Specific Planning Policy Requirement 1 states that housing 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 unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.	This proposed apartment development provides for 70 no. 1 beds (48%) and 75 no. 2 beds (52%). The proposed unit mix is in compliance with SPPR1.															
15.9.2 Unit Size / Layout Table 15-5: Minimum Floor Area Requirements for Apartments <table><tr><th>Unit Type</th><th>Bedspace</th><th>Floor Area Requirement (min)</th></tr><tr><td>Studio</td><td>1 bedspace</td><td>37 sq. m.</td></tr><tr><td>1 bed</td><td>2 bedspaces</td><td>45 sq. m.</td></tr><tr><td>2 bed</td><td>4 bedspaces</td><td>73 sq. m.</td></tr><tr><td>3 bed</td><td>5 bedspaces</td><td>90 sq. m.</td></tr></table>	Unit Type	Bedspace	Floor Area Requirement (min)	Studio	1 bedspace	37 sq. m.	1 bed	2 bedspaces	45 sq. m.	2 bed	4 bedspaces	73 sq. m.	3 bed	5 bedspaces	90 sq. m.	Please see the Housing Quality Assessment which outlines unit areas. All units are in accordance with this section of the development plan.
Unit Type	Bedspace	Floor Area Requirement (min)														
Studio	1 bedspace	37 sq. m.														
1 bed	2 bedspaces	45 sq. m.														
2 bed	4 bedspaces	73 sq. m.														
3 bed	5 bedspaces	90 sq. m.														
15.9.3 Dual Aspect Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations	57% of all units are multiple aspect this is in accordance with the development plan.															
15.9.4 Floor to Ceiling Height A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided.	The proposed development meets this minimum ceiling height standard. A ceiling height of 2.7m has been applied across all floors throughout the development.															
15.9.5 Lift, Stair Cores and Entrance Lobbies Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design	The residential floors of the proposed development provides a maximum of 12 no. units per core or less.															

Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.	
15.9.6 Internal Storage Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	Please see the HQA – This is in accordance with the Development Plan
15.9.7 Private Amenity Space 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. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	Please see the HQA – This is in accordance with the Development Plan
15.9.8 Communal Amenity Space The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.	Please see the HQA – This is in excess of the Development Plan
15.9.11 Security New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.	The provision of public and communal open space as well as residential amenities throughout the development encourages active passive surveillance.
15.9.12 Access and Services Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.	Pedestrian and vehicular access points are clearly identified. The proposed development is designed in accordance with Part M building regulations.
15.9.13 Refuse Storage Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities. All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the	Appropriate waste facilities are provided. Please refer to the Operational Waste Management Plan prepared by Traynor Environmental which clearly identifies the projected quantities of waste and the proposed waste collection strategy as per Appendix 7 of the Dublin City Development Plan.

projected quantities of waste and the proposed waste collection strategy	
15.9.14 Lifecycle Reports All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.	Please refer to the Building Lifecycle Report prepared by BKD Architects.
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.	Please refer to the Operational Management Plan prepared by Lioncor.
15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.	Please refer to the Microclimate Wind Analysis and Pedestrian Compact Report and Daylight and Sunlight Analysis prepared by IN2 which have been carried out in accordance with the standards and guidance as outlined in the Development Plan. Please also refer to the Noise Assessment prepared by Traynor Environmental prepared in accordance with the guidance set out in the Development Plan.
15.9.16.1 Daylight and Sunlight A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.	
15.9.16.2 Wind A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.	
15.9.16.3 Noise All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014.	
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	The proposed development is in excess of 22m to its nearest adjoining neighbours to the north, east and west.

<p>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>It is also note, given the nature of the site and the slight angle of the buildings none of these windows are directly opposing rear existing windows. There is no undue loss of privacy as a result of this development.</p> <p>Within the development, each of the proposed blocks have been adequately set back to ensure at least 21.1m separation between opposing apartment windows. This separation distance is in excess of the 16m required by the Compact Settlement Guidelines.</p>
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Chapter 8: Sustainable Movement and Transport

Policy	Evaluation of Consistency
<p>SMT1 Modal Shift and Compact Growth</p> <p>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>89 no. car parking spaces are proposed to be provided. Residential parking will equate to a ratio of 0.57 cars per unit. This is appropriate given its Central and Accessible location and the aim to create a modal shift to more sustainable modes of transport. As set out above, the site is within c.300m of high frequency existing and proposed bus services including permitted BusConnects routes.</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 from the site.</p>
<p>SMT4 Integration of Public Transport Services and Development</p> <p>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>The site is very well services in terms of public transport. The application site is directly served by a number of bus routes serving stops located on Kimmage Road West (300m from the site) namely the 9, 15a and S4 services. It should be noted that both the 9 and S4 services are deemed to be high-frequency bus routes i.e. have a peak frequency of 10 minutes. In addition to the above, bus routes 54a and 74 passes through Kimmage Cross Roads, ca. 500 metres (ca. 6 minutes' walk) from the site, while bus routes 83 and 83a operate from Stannaway</p>

	<p>Avenue, ca. 700 metres (ca. 9 minutes' walk) from the site.</p> <p>There are numerous bus routes which serve the site along the Kimmage Road West.</p>
<p>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>The proposed development encourages a modal shift to sustainable transport methods. The scheme incorporates a reduced car parking provision. Please see the Residential Travel Plan prepared by BMCE submitted as part of this application.</p>
<p>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>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 public realm 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 developments adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company.</p>
<p>SMT12 Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.</p>	<p>The proposed development will result in a new public open space adjacent to the now closed Nora Dunne Gallery. Within the development a new pedestrian route is provided along the southern eastern boundary connecting the blocks in an attractive, car free manner. Vehicles are directed to basement parking upon entering the proposed development.</p>
<p>SMT13 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.</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.</p>
<p>SMT16 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</p>	<p>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.</p>

ages and abilities, in line with the city's mode share targets.	
SMT18 The Pedestrian Environment To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.	The proposed development will provide new open space. This will also be overlooked by the apartments making public open space a safe and attractive place to be. We note that this site is a cul-de-sac, surrounded by existing properties on all sides. Though permeability through the site to other areas is not possible to deliver, the internal road network strategy allows for ease of use by all residents of the development, along with users of the cultural/community space and the public open space.
SMT010 Walking and Cycling Audits Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.	Please refer to BMCE documentation which provides a full list of walking and cycling facilities in the area.
SMT27 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 one per dwelling for residential development at this location which equates to 145 no. car parking spaces for the proposal (1 per unit). The proposed 89 with a ratio of 0.57 no. car parking spaces is below this maximum in line with government guidance and emerging trends for sustainable residential developments and reduced parking. We also note that there is no minimum provision specified. This is considered an appropriate quantum of parking given the site's accessible location, the variety of public transport options for the site, and the facilities in the area.
SMT29 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	EV Charging Infrastructure will be provided for throughout the development at a rate of 50% in accordance with SMT29.
SMT33 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 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.	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

<p>SMT34 Street and Road Design</p> <p>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>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 at the main entrance to ensure a predominantly car free environment.</p>
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Chapter 9: Sustainable Environmental Infrastructure and Flood Risk

Policy	Evaluation of Consistency
<p>SI2 Integrating Water Services with Development</p> <p>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>Communication has taken place with Uisce Eireann for the provision of drinking water, water conservation and drainage infrastructure.</p> <p>A Confirmation of Feasibility and Statement of Design Acceptance is submitted as part of this submission and is appended to the Infrastructure Report prepared by BMCE.</p>
<p>SI3 Separation of Foul and Surface Water Drainage Systems</p> <p>To require all new development to provide separate foul and surface water drainage systems.</p>	<p>Subject to the grant of planning permission the applicant will engage with Uisce Eireann to agree implementation and connection to the water and wastewater networks in line with the COF. The upgrade works are within the public domain and are likely to be carried out by Uisce Eireann or one of their contractors</p> <p>Please refer to the Infrastructure Report prepared by BMCE for information on the proposed foul and surface water drainage systems.</p>
<p>SI4 Drainage Infrastructure Design Standards</p> <p>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 complies with these standards Please see the BMCE Consulting Infrastructure Report.</p>
<p>SI6 Water Conservation</p> <p>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>SI14 Strategic Flood Risk Assessment</p> <p>To implement and comply fully with the recommendations of the Strategic Flood Risk</p>	<p>The Flood Risk Assessment by BMCE has carried out an SFRA. This report concludes as follows:</p>

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.

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:

- 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 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.
- On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and

"This report outlines the findings of the SSFRA carried out for the mixed use, primarily residential development at Carlisle, Kimmage, Dublin 12. This SSFRA was carried out in accordance with the DEHLG guidelines for Planning 2009 and The Planning and Development Act 2000, and with reference to the DCC Development Plan 2022-2028 and SDCC Development Plan 2022-2028.

Based on available and recorded information, the site of the proposed residential blocks itself has not been subject to flooding in recent history. Adjacent areas, including part of the existing access road, however, have experienced flooding. However, the flood depths on the access road would not impinge access and egress for emergency service vehicles.

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

The risk of fluvial flooding to the residential buildings and surrounding footpaths and roads is considered low as these areas lie outside the 0.1% AEP event. Fluvial flooding to the existing access road will not impact access and egress of emergency service vehicles.

The proposed Poddle Flood Alleviation Scheme will negate the risk of fluvial flooding on the existing access road and Kimmage Road west in the 1% AEP event.

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 the development.

Based on the flood risk identification in Stage 1, the existing access road serving the proposed development falls in Flood Zone A & B. A justification test has been applied and the proposed development is deemed 'Appropriate' in accordance with the guidelines of the OPW's publication."

<p>development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. 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>	
<p>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, 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>Please see the Infrastructure Report by BMCE which sets out the flood risk management and SuDS measures throughout the site.</p> <p>The proposed development promotes the use of natural and nature based flood risk management through the inclusion of SuDs components including blue roof and extensive sedum green roofs, intensive green roofs, and permeable paving.</p>
<p>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)/ 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 & 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>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 &</p>	

Blue Roof Guide (2021) which is summarised in Appendix 11.	
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.	The proposal has been designed in accordance with the council's surface water management guidance.
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).	The proposed drainage infrastructure will comply with standards set out in Greater Dublin Regional Code of Practice for Drainage Works. The proposed development does not include any lands to be taken in charge.
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).	Please refer to the Operational Waste Management Plan prepared by Traynor Environmental submitted as part of this application. The Operational Waste Management Plan demonstrates that adequate and easily acceptable waste storage spaces are provided within the scheme.
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 2020 (or and any future updated versions of these guidelines produced during the lifetime of this plan).	
SI37 Noise Sensitive Development To give careful consideration to the location, design and construction of noise sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance.	Please refer to the Noise Assessment Report prepared by Traynor Environmental.
SI42 Light Pollution To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals	Please refer to the lighting plan submitted as part of this application by IN2. This plan demonstrates that light spillage and pollution has been minimised as much as possible.

minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.	
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.	Please refer to the lighting plan submitted as part of this application by IN2. This plan demonstrates that energy efficient lighting has been proposed.

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale	
Objective 1: To promote development with a sense of place and character Enhanced density and scale should: <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>The text, diagrams and illustrations in Architects Design Rationale prepared by BKD Architect's and also in the supporting information submitted with this application for planning permission, demonstrate compliance with this objective.</p> <p>By drawing inspiration from the local built and natural heritage, the design respects development constraints and aims to strengthen community ties through thoughtful outdoor spaces and amenities, contributing to a healthy placemaking environment. The proposal's distinctive architectural features and varied building heights create visual interest without overwhelming the area, allowing for an appropriate transition in scale that blends seamlessly with adjacent structures.</p> <p>The project prioritises accessibility, situating residences in a vibrant location in close proximity to a number of public transport options, including future planned Bus Connect routes. The proposal will include a public open space to the south east of the site, adjacent to the Nora Dunne Gallery (currently closed). This will provide the opportunity to create a public open space which the wider community can enjoy.</p> <p>The apartment blocks, open spaces, creche and community uses have been carefully</p>

	designed and located to minimise any negative impact on the adjacent residential properties. The blocks have been stepped back adjacent to existing residential houses to minimise overlooking and the impact on daylight and sunlight. This has been demonstrated in the architectural pack, the daylight sunlight analysis and the townscape and visual impact assessment.
Objective 2: To provide appropriate legibility Enhanced density and scale should: <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. 	The proposed development will provide a strong frontage to the southern boundary of the subject site, replacing a currently non-active frontage. The increased density will help create a sense of enclosure and sense of place for pedestrians in this area.
Objective 3: To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should: <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 southern boundary. This will provide a good sense of enclosure to 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 maintaining an appropriate ratio.</p> <p>The development avoids the creation of towering canyons that overwhelm pedestrian experiences, instead fostering a sense of human scale. The design incorporates varied facade treatments and strategically placed entrances to promote active uses at street level, enhancing passive surveillance and inviting community interaction.</p> <p>Furthermore, public spaces are designed with careful consideration of enclosure and connectivity, creating vibrant thoroughfares that encourage social engagement while ensuring safety and visual interest, all of which significantly elevate the overall urban landscape.</p>
Objective 4: To provide well connected, high quality and active public and communal spaces Enhanced density and scale should:	The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises

<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 communal spaces, particularly to residential courtyards, • 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>pedestrians, cyclists and public transport with a reduced car parking ratio provided primarily out of sight at undercroft level. Cycling parking facilities are also located within the basement.</p> <p>The blocks have been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties.</p> <p>The spaces and streets have all been designed to be people friendly and accessible.</p> <p>The blocks have been designed to ensure adequate penetration to the public and communal open spaces. Please refer to the Daylight and Sunlight Analysis Report prepared by IN2 which confirms this.</p> <p>The proposed buildings do not form a perimeter block.</p> <p>The buildings have been designed to mitigate against potential microclimate effects, please refer to the Wind Analysis prepared by IN2.</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 as shown on the 'General Arrangement – Total Open Space' dwg. no L1-101 prepared by NMP Landscape Architects. All of these spaces are safe, accessible, inviting and attractive.</p> <p>The proposed development has been designed to ensure passive surveillance is provided to the public spaces and communal open space while also ensuring a high level of privacy is maintained for the proposed units by using the blocks orientation and layout, buffering and screening, balcony design and height and building setbacks.</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 	<p>The subject site is located within a short walking distance of a range of amenities such as retail, restaurants, public houses and employment hubs. Therefore, it was not considered appropriate to provide mixed</p>

<p>development as well as social and community infrastructure,</p> <ul style="list-style-type: none"> • 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>uses on the subject site, other than the proposed Community Cultural and Arts provision and the creche. The Cultural Infrastructure (Impact) Assessment prepared for by Turley demonstrates the demand for the Community, Cultural and Arts use.</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 by increasing the local population, generating additional demand for facilities and amenities in the area and provide housing for people to live.</p> <p>The proposed mix of one and two bed apartments will improve the housing supply quality in the area and provide different options for people at different stages of the life cycle.</p>
<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 	<p>The scheme has been carefully modulated and orientated to maximise access to natural daylight, ventilation, privacy, and views, while minimising overshadowing and loss of light, in accordance with Appendix 16. This is demonstrated in the Architectural Design Rationale and Architectural Drawings prepared by BKD Architects.</p> <p>The layout and orientation have been designed so as not to compromise the ability of existing or proposed buildings to achieve passive solar gain.</p> <p>The proposed units have been designed to incorporate a degree of physical adaptability and internal flexibility in both layout and function, supporting the long-term usability of the homes.</p> <p>Plant at roof level is minimised in scale and will be appropriately finished and screened, as demonstrated in the Architectural Elevations, ensuring it is discreet and unobtrusive within the overall roofscape.</p> <p>57% of the proposed units are dual aspect, thereby maximising passive solar gain,</p>

<p>possible in the context of a particular site (See Appendix 16),</p> <ul style="list-style-type: none"> • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS 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>supporting natural cross ventilation, and contributing to good street frontage and residential amenity.</p> <p>The development will be constructed using high-quality materials and robust construction methodologies, as outlined in the Design Statement by BKD Architects.</p> <p>The scheme incorporates a range of sustainable technologies, and the building fabric and systems are designed to be energy efficient and climate resilient, as detailed in the Energy Analysis Report prepared by IN2.</p> <p>Quantitative assessments of daylight and sunlight have been carried out in line with Appendix 16 to ensure high levels of amenity. Where full compliance with BRE guidance is not achievable due to site constraints, compensatory design measures have been incorporated where appropriate.</p> <p>An Integrated Surface Water Management Strategy has been developed in accordance with Appendix 13, and is outlined in the Engineering Planning Report and SuDS Strategy prepared by BMCE Engineering.</p> <p>A Flood Risk Assessment has been carried out in line with the SFRA (Volume 7).</p> <p>An assessment of embodied energy impacts has been completed, in accordance with Section 15.7.1, demonstrating a commitment to reducing lifecycle environmental impacts.</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 most efficient ways possible integrated into the design. 	<p>The subject site is well connected to the wider area with high quality, high frequency bus routes serving Kimmage Road West. The frequency, capacity and destinations is set out in the PTCA and the TTA submitted with this application. The PTCA confirms that during the AM and PM peak hours, excess bus service excess capacities were found to be 63% and 67% in the direction of maximum demand. These documents confirm that there are bus services within 500m of the site which has buses running every ten minutes.</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. Secure cycle parking facilities have been provided throughout the scheme.
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. 	The site is not located within an Architectural Conservation Area and there is no Protected Structure or National Monuments Identified on the site.
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 refer to the Operation Management Statement prepared by Lioncor for the proposed development.

Appendix 5 Transport and Mobility: Technical Requirements	
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.	The proposal has been designed to ensure pedestrian and cyclist permeability within the site.
A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network.	Please refer to the Parking Report / Residential Travel plan prepared by BMCE.
All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements.	Please see the traffic and transport assessment and associated traffic drawings prepared by BMCE which demonstrate safe vehicular access and egress arrangements.
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 BMCE 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.	A Quality Audit has been carried out and is submitted as part of this application.
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.	A Residential Travel Plan is submitted which demonstrates the proposed management strategy for the site, the alternative modes of transport and measures to promote a modal shift to more sustainable modes of transport.
The servicing requirements for any development should be established early in the preplanning process.	Please see the traffic drawing pack by BMCE. This includes swept path analysis drawings for Refuse Bin Trucks, Fire Brigades, and ESB Trucks.
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 site layout indicating the service layout and drop off areas. A Service and Delivery Access Strategy has been prepared by BMCE and is submitted as part of this application.
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 a development is located in close proximity to a Luas line, consideration to the impact of deliveries	The site is not immediately adjacent to a Luas line.

and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined.	
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 Report & Residential Travel Plan and an Outline Car Park Management Strategy, both by BMCE, are submitted with this application. This addresses items relating to car parking and car parking management.
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.	<p>Please see the Parking Report & Residential Travel Plan and the Outline Car Park Management Strategy. This confirms the active management by the Car Park Manager for the usage of all spaces, visitors, residents, and for the non residential uses.</p> <p>The proposed development includes car parking with 2 spaces for the cultural/ community space, and 4 spaces for the creche which can have dual usage accommodating visitor parking at night for residents of the development. There are also 83 no. car parking spaces within the development.</p>
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.	The proposal does not currently include car sharing/ club spaces. however, these can be accommodated in the future.
The maximum standards for car parking provision are set out in Table 2.	Table 2 sets a maximum requirement but encourages reduced car parking provision. In line with the strategy and reflecting the sites location in a highly accessible location it is appropriate to provide a reduced parking ratio of 0.57. This rationale is set out in Section 2.4 of the BMCE pack.
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).	
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	The bicycle stores are fully and easily accessible. The Architect's Design Rationale includes details on the location and accessibility of the bike stores.

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.	All the bikes stores and spaces are provided at ground level
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 465 no. bike spaces including cargo bike spaces provided throughout the development in a variety of locations easily accessible to each apartment block and each of which are 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 305 no. bike parking spaces. This proposed development provides 465 no. bike parking which is in excess of this figure.
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.	
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 surface level. They are located within a short distance from the entrances to the apartment blocks in secure shelters.
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 also provided and are designed to meet their basic function of preventing theft of vandalism.
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 landscape architects' drawings.

<p>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</p>	<p>The proposal exceeds the standards set out in the Table 1.</p>
<p>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</p>	<p>The subject site is located in parking zone 2 (in accordance with Map J of the DCDP and Appendix 5, Section 4). Table 2 requires a maximum of 1 spaces per unit or 145 no. car parking spaces for the proposal (1 per unit).</p>
<p>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</p>	<p>The 145 apartments are provided with 89 car parking spaces at a ratio of 0.57 units per hectare.</p> <p>This car parking provision is considered appropriate for this highly accessible location. Please refer to Section 2.4 of the Parking Provision Report & Residential Travel Plan.</p>
<p>Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria:</p> <ul style="list-style-type: none"> • Locational suitability and advantages of the site. • 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>The site is situated within the established suburban area of Kimmage, a well-served and walkable neighbourhood with a wide range of local services, schools, shops, and amenities available within close proximity. This ensures a high level of self-sufficiency and reduces the need for car ownership.</p> <p>The development is located approximately 4 minutes' walk from Kimmage Road West, where the No. 9 Dublin Bus route operates, providing a high-frequency service to the city centre and surrounding areas. Additional bus routes also operate along this corridor, reinforcing the area's strong public transport connectivity.</p> <p>The site benefits from strong pedestrian and cycling infrastructure, with footpaths and cycling routes linking to the wider local network. The development will further enhance permeability through new pedestrian connections and secure bicycle parking facilities, encouraging active travel.</p> <p>A broad range of services—including retail outlets, schools, cafés, medical practices, and employment opportunities are located within a short walk of the site. This supports a</p>

	<p>reduced reliance on private car use for daily needs.</p> <p>The site is located within close proximity to areas served by shared mobility options, including bike share and car share schemes, supporting flexible, low-car lifestyles for future residents.</p> <p>A parking strategy has been developed to ensure that the reduced provision will not result in overspill onto surrounding streets. The scheme has been carefully designed to protect the amenity of nearby properties and to avoid adverse impacts on the wider area.</p> <p>The proposal has been reviewed from a traffic safety perspective, and it is not anticipated to cause obstruction to other road users. Access arrangements and internal circulation have been designed in accordance with best practice standards.</p> <p>A robust Parking Report and Residential Travel Plan has been prepared and will be implemented to support sustainable travel behaviour, including measures to promote walking, cycling, and public transport use among future residents.</p>
At least 5% car parking spaces shall be designated accessible car parking spaces.	5% of the car parking spaces provided have been designed as accessible car parking 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	50% of the car spaces have access to EV charging.
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	The proposal includes 6 no. motorcycle spaces within the scheme. This exceeds the 5% rate of car parking spaces provided. The spaces have been designed in accordance with best practice guidelines.

or posts should be provided to secure a motorcycle using a chain or similar device.	
All car club spaces shall be fully equipped with EV infrastructure	N/A
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.

DCC Appendix 5 Table 1 Bicycle Parking Standards for Various Land Uses

Land Use	Long Term	Short Stay
Residential Apartment	1 per bedroom	1 per 2 apartments
Residential Dwelling	1 per unit	1 per 5 dwellings
Café	1 per 5 staff	1 per 10 staff
Retail	1 per 5 staff	1 per 100 sq.m GFA

DCC Appendix 5 Table 2 Maximum Car Parking Standards for Various Land Uses

Land Use	Zone 1	Zone 2	Zone 3
Houses, Apartments/Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling
Café Restaurant and Takeaways	None	1 per 150 sq.m seating area	1 per 150 sq.m seating area

Development Type	Area / units	Maximum Car Parking Standards	Maximum Car Parking Required
Apartments	70 No. 1-bed 75 No. 2-bed	1.0 per 1-bed unit + 1.0 per 2-bed unit	$70(1)+75(1) = 145$
Cultural / Community	813 m ² GIA	1 per 275 m ² GFA	3
Creche	210 m ² internal 130 m ² outdoor play 10 No. staff 30 No. children	1 per 100 m ² GFA	$210 \div 100 = 2$
		Bike parking standards	Bike parking required
Apartments	70 No. 1-bed 75 No. 2-bed	1 per bedroom + 0.5 per unit	$220(1)+145(0.5) = 293$
Cultural / Community	813 m ² GIA Max 5 No. staff	1 per 5 No. staff + 1 per 100 m ² GFA	$1+9 = 10$
Creche	210 m ² internal 130 m ² outdoor play 10 No. staff 30 No. children	1 per 5 No. staff + 1 per 10 No. children	$2+3 = 5$

Table 3-1: Parking required under Dublin City Council Development Plan Standards (2022-2028)

Figure 9 Extract from the Traffic Impact Analysis

Please refer to the Parking Report and Residential Travel Plan prepared by BMCE. It is proposed to provide 83 No. car parking spaces for the residential component, equating to 0.57 No. spaces per residential unit. In terms of cycle parking provision, it is intended to provide 462No. cycle parking spaces, 100% of the 2022-2028 Dublin City Development Plan and of the National Cycle Manual requirements respectively (both require 1 No. space per bed for residents and 0.5 No. spaces per residential unit for visitors).

As demonstrated by the above statements of compliance, this proposed development is fully in accordance with the National, Regional and Local Planning Policies.

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 compared to the previously granted LRD, but with reduced building height, reduced apartment numbers and altered unit mix in response to the LRD Opinion received from DCC and the new Development Plan. This proposal also includes cultural/ community space and a creche at the ground floor of blocks 4 and 5.

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:

- Project Ireland 2040 - National Planning Framework (2018) ("**NPF**");
- National Planning Framework First Revision (2025) ("**NPFFR**");
- Climate Action Plan (2025) ("**CAP 2025**");
- Transport Strategy for the Greater Dublin Area 2016 – 2035 ("**TSGDA**");
- Greater Dublin Area Transport Strategy 2022-2042 ("**GDATS**");
- Childcare Facilities Guidelines for Planning Authorities 2001 ("**CFG**");
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 ("**QHSC**");
- Regional Spatial and Economic Strategy 2019- 2031 ("**RSES**");
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) ("**Compact Settlement Guidelines**");
- Urban Design Manual: A Best Practice Guide 2009 ("**UDM**")
- Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023) ("**Apartment Guidelines**");
- Design Manual for Urban Roads and Streets (2013) ("**DMURS**");
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) ("**Planning System and Flood Risk Guidelines 2009**");
- Guidelines for Planning Authorities on Urban Development and Building Heights (2018) ("**Building Height Guidelines**");
- Dublin City Development Plan 2022-2028 ("**DCDP**")

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.

Thank you for taking the time to consider the proposal and we look forward to a positive planning decision in due course.