

Planning Report & Statement of Consistency

**Lands at
Junction of Sallynoggin
Road, Glenageary Avenue and,
Glenageary Roundabout,
Glenageary,
Co. Dublin**

On behalf of

Red Rock Glenageary Ltd.

October 2023



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1 Executive Summary

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have prepared this Planning Report on behalf of **Red Rock Glenageary Ltd.**, for a proposed mixed-use residential development proposal at lands at **Junction of Sallynoggin Lower and Glenageary Avenue, Glenageary, Co. Dublin.** For clarity, the site is located within the administrative boundary of Dún Laoghaire-Rathdown County Council.

This report is intended to identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Dun Laoghaire Rathdown County Development Plan 2022.

A summary of the main points of this report are set out below (emphasis added in bold):

Subject Site:

- The subject site is located at a key junction to the south of Glenageary Roundabout, a large, underutilised site extending to c. 0.74 ha.
- The area is generally characterised by single and two storey houses. There is an existing neighbourhood centre on the eastern side of the Glenageary Roundabout and the site is adjacent to ‘Lidl’, a convenience foodstore to the southwest.
- There is a significant quantum of services, facilities and amenities located in the immediate surrounding area, this includes: medical centre, pharmacies, shops, cafés/restaurants, bars, gyms, schools, childcare facilities and banks for example.
- The site is well served by public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site. The site is also located c. 1.2km (16-minute walking distance) from Glenageary DART Station.

The Proposal:



Figure 1 – CGI View from Glenageary Avenue

- A total of 138 no. residential apartment units are proposed, which are broken down as 37 no. 1 bed units, 68 no. 2 bed (4 person) units, 6 no. 2 bed (3 person) units and 27 no. 3 bed units with associated residential amenity services in 2 no. interlinked blocks ranging in height from 4-7 storeys over basement level.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities. **Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.**

- A total of 7 no. commercial units are proposed at ground floor level to include 2 no. restaurants, retail – clothing units, retail – florist units, retail – pharmacy unit and hairdresser unit. A childcare facility with a dedicated outdoor children’s play area is also proposed.
- Variation in building height along with a mix of apartment types, ground floor level commercial activities, all combine to provide **a rich living environment close to a host of facilities and landscape amenities.**
- The provision of retail, restaurant and commercial floor space, in conjunction with the layout of the ground floor level and the aesthetic of the wider scheme, serves to provide an appropriate interface between the subject development and the immediate adjoining public realm.
- The scheme responds to its context through the provision of a gradual increase in height from the prevailing contextual height to transition to increased development height between 4 to 7 storeys with a stepped approach to create a variety and visual interest and to comply with the cumulative heights strategy. **The site occupies a strategic position as a corner site in urban design terms with the potential to create a focal point at the Junction of Sallynoggin Road and Glenageary Avenue.** The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this suburban vacant site.
- The proposed scheme with its active frontage at ground floor level and the proposed architectural features of an arch **creates a welcoming pedestrian passageway from the roundabout through an active internal public plaza connecting to the adjoining public realm and neighbouring lands.**
- Public realm upgrades proposed as part of this development will transform the currently underutilized land within and surrounding the development site to create a quality mixed use environment. **The vision for the project scheme is to create a unique sense of place with a strong community identity characterised by the public plaza will act as prominent focal point set within the area.**



Figure 2 – CGI Internal View of Public Plaza

- 2 no. resident amenity spaces are also proposed at ground floor level of Blocks A and B to include resident support services, concierge services, communal storage, co-working space, social / activity spaces and a gym.
- A variety of open spaces are proposed to include public open space in the form of a public plaza accommodating outdoor seating, planting, pedestrian and cycle links and enclosed communal open space which also includes 2 no. roof terraces proposed at the link of Block A and Block B and on the fifth floor level of Block B.
- Appropriate levels of car parking will be provided to cater for the residential development. **A ratio of 0.57 spaces per unit is considered appropriate given the site’s proximity to public transport and local amenities/services and the proposal’s full compliance with bicycle parking requirements. This provision is based on 80 car parking spaces for 138 residential units.**



- The scheme proposed strives to maximise the use of the site whilst providing an appropriate scale, massing and unit mix on site.

Planning Context:

- The subject proposal fulfils the objective of the ‘NC’ zoning ***“to protect, provide for and-or improve mixed-use neighbourhood centre facilities”*** by providing an appropriate mix of uses of residential and commercial uses at ground floor level including a childcare facility. All of the uses proposed are permitted in principle under this zoning objective.
- **The proximity of the site to public transport and local amenities and services means the site is opportune located to provide for higher residential density and additional height in compliance with the national policy mandate.**
- The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.





2 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have prepared this Planning Report on behalf of **Red Rock Glenageary Ltd.**, for a proposed mixed-use residential development proposal at lands at **Junction of Sallynoggin Lower and Glenageary Avenue, Glenageary, Co. Dublin** on a site extending c. 0.74 ha.

This report is intended to specify the rationale behind the subject proposal; to identify consistency and compliance with the relevant national planning policy guidelines under Section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Dún Laoghaire-Rathdown County Development Plan 2022-2028.

The overall proposal relates to a Large-scale Residential Development (LRD) to consist of a new neighbourhood centre to include 138 no. apartment units with associated residential amenity spaces, a childcare facility, retail and commercial units, and associated public plaza and communal open spaces.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority to deliver on a proposal that is appropriate to the site and the surrounding context in Glenageary. The Planning Authority is aware of the Applicant's commitment to delivering a high-quality residential development as evidenced in the pre-planning meeting.

The proposal reflects the feedback and Opinion received following the Section 32 Pre-Planning Consultation carried out between the project design team and Dún Laoghaire-Rathdown County Council's Planning Department on 21st September 2023.

The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal.

The residential units proposed are of exceptional quality, with high amenity layouts, community facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties in the design of this scheme.

The development includes supporting residential amenity services which are wholly appropriate for this scheme. Public realm upgrades proposed as part of this development will transform currently underutilised land within and surrounding the development site to create a quality neighbourhood centre scheme.

We ask the Planning Authority to consider these points in their review of proposals and we trust that they will view this proposal as a positive move towards the delivery of much needed residential development at an opportunistically located site.

The Planning Authority is now invited to review the contents of this submission and accompanying documentation to consider the proposal on its merits and in line with the relevant statutory policy context.

We confirm that this application for a Large-Scale Residential Development is made in the form of 6 hard copies and 1 digital copy, as required.





3 Applicant & Design Team

Our client has appointed an experienced design team to prepare a mixed-use residential development scheme, which will be lodged under the Large-Scale Residential Development process to Dún Laoghaire-Rathdown County Council. The design team currently comprises of the consultants listed below:

- Red Rock Glenageary Ltd. – Applicant
- John Fleming Architects – Design Architects
- Brock McClure Planning & Development Consultants – Chartered Town Planners
- AECOM – Consulting Engineers
- Parkhood – Landscape Architects and Visual Impact
- 3D Design Bureau – CGIs, Verified Views & Photomontages
- JAK – M&E Engineers
- Vision – Construction Management
- AWN – Environmental Management and Acoustics Consultants
- Enviroguide Consulting – Climate Change Impact Assessment
- Verde – Environmental Consultants
- Openfield – Ecologists
- Hooke & MacDonald – Operational Management Consultants
- Jensen Hughes – Fire Safety Consultant



John Fleming Architects



**Brock
McClure**
PLANNING & DEVELOPMENT CONSULTANTS



Park Hood
Chartered Landscape Architects

AECOM



**3D DESIGN
BUREAU**

JAK

Consulting Engineers



openfield

awnconsulting
A Trinity Consultants Company

Verde
celebrating 20 years in business 20



enviroguide
consulting



**Hooke &
MacDonald**



JENSEN HUGHES





The various inputs from the design team are referenced where relevant within this report. We confirm that the following reports are included herewith to enable Dún Laoghaire-Rathdown County Council to make a comprehensive assessment of the scheme:

Deliverable:	Responsibility:
Letter of Consent - DLRCC	Applicant Applicant
Letter of Consent – Lidl Ireland GmbH	
Development Description	Brock McClure Consultants
Planning Application Form	
LRD Form 19	
Part V Acknowledgement Letter	
Site Notice (Yellow) – Erected on 27 th October 2023	
Newspaper Notice – Published in the Irish Daily Star on 27 th October 2023	
Planning Report & Statement of Consistency	
LRD Opinion Response Document (Incl. DLRCC LRD Opinion)	
Social Infrastructure Audit	
Architectural & Masterplanning Design Statement	
Site Location Map	John Fleming Architects
Site Layout Plan	
Full Set of Architectural Drawings & Drawing Register (incl. Part V Proposal)	
Housing Quality Assessment & Development Schedules	
Universal Design Statement	
Landscape Architecture Drawings & Drawing Register	Parkhood Landscape Architects
Landscape Design Statement	
Townscape and Visual Impact Assessment	
Engineer Drawings & Schedule	AECOM
Infrastructure Report (incl. Confirmation of Feasibility from Irish Water)	
Flood Risk Assessment	
Traffic and Transport Assessment (incl. Letter of Support from GoCar)	
Cycle Audit	
Mobility Management Plan	
Quality Audit (Stage 1 and Stage 2) incl. Road Safety Audit	Bruton Consultants
Storm Water Audit	PUNCH
Public Lighting Layout and Report	JAK
Media & ESB Site Services Layout	
Building Lifecycle Report	
Sustainability and Services Report	
Public Odour Mitigation Statement	
Glint and Glare Mitigation Statement	
Appendix 1 – Conditional Planning Exemptions	
Operational Waste Management Plan	
Resource & Waste Management Plan	AWN
Noise and Vibration Impact Assessment	
Microclimate Assessment	
Screening for Appropriate Assessment Report	Openfield
Ecological Impact Assessment	Verde
Environmental Impact Assessment Screening Report	
Climate Change Impact Assessment Report	Enviroguide
Construction Environmental Management Plan	Vision Contracting
Daylight and Sunlight Assessment	3D Design Bureau
Photomontages / CGIs / Verified Views	Hooke & MacDonald
Operational Management Plan	





Context for the lodgement of this Submissions

Following the receipt of the LRD Opinion from the Dún Laoghaire-Rathdown County Council under PAC/LRD2/004/23, it was concluded that :

*“pursuant to Section 32D of the Planning and Development Act, 2000 (as amended), stating that it is of the opinion that – the documentation submitted with the consultation request under section 32B of the Act **does constitute a reasonable basis** on which to make an application for permission for the proposed LRD.”*

Hard & Digital Copies

In addition, we confirm specifically that:

- 6 no. hard copies and 1 no. digital copy of all material has been issued to the Planning Authority of Dún Laoghaire-Rathdown County Council.

Website

We confirm that a digital copy of all material is also available to view at the following website:

www.glenagearygatelrd.ie



4 Site Location and Context

The site subject of this pre-planning meeting request is located at a key junction to the south of Glenageary Roundabout, a large, underutilised site extending to c. 0.74 ha and is identified in Figure 3 below. The subject site itself is brownfield in nature and has been underutilised for more than 10 years. The immediate surroundings of the site are a mix of commercial, light industrial, employment and residential land uses.



Figure 3 – Aerial Map with subject site outlined in Red

In terms of surrounding residential developments, the area is generally characterised by single and two storey houses. There is an existing neighbourhood centre on the eastern side of the Glenageary Roundabout and the St. John of God community services facility on the northern side of the roundabout. The site is also adjacent to 'Lidl', a convenience foodstore, to the southwest and to the south by Glenageary An Post Sorting Office.

We further note that there is a significant quantum of services, facilities and amenities located in the immediate surrounding area, this includes: medical centre, pharmacies, shops, cafes/restaurants, bars, gyms and banks for example. There are also a number of schools, childcare facilities and other educational services in the surrounding area. Given the extent of existing facilities in the area, it is considered that the subject site is an opportunistic site for the provision of a mixed-use residential development to further improve the neighbourhood centre facilities in the area and further residential development can be readily absorbed by the existing and proposed facilities in the area.

The site is well served by public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area.

There are two bus stops located at the subject site's boundary. The bus stop on Sallynoggin Road (Stop 3205) is serviced by route no.:

- 7A (Mountjoy Square – Loughlinstown Park)
- 7D (Mountjoy Square – Castle Street)
- 45A (Dún Laoghaire – Kilmacanogue)
- 45B (Dún Laoghaire – Kilmacanogue)

○ 111 (Dalkey – Brides Glen)

The bus stop located on Glenageary Avenue (Stop 7646) is serviced by route no. 7 (Mountjoy Square – Brides Glen Bus Stop)

The site is also in close proximity to the BusConnects Quality Bus/Bus Priority Routes L22 (Dún Laoghaire – Brides Glen), L11 (Dún Laoghaire - Kilmacanogue), 98 (Mountjoy Square via City Centre – Loughlinstown Park), P12 (Dalkey – Townsend Street)

The site is also located c. 1.2km (16-minute walking distance) from the Glenageary DART Station. Dun Laoghaire DART Station is located c. 2km (26-minute walking distance) from the site.

The subject site is also located in proximity to various locations such as Dalkey, Glasthule, Dun Laoghaire, Monkstown and Blackrock which offer a wide range of services and amenities. These are active urban areas which are pedestrian friendly and offer a high-quality public realm served by active road links between each location. It is the design team's intention to propose a development which will help to improve the Glenageary area which is currently underutilised with a lower quality public realm. From the outset, it was the design team's intention to create a scheme that will integrate into the surrounding area while also making a positive contribution to the improvement of legibility by proposing a new public plaza with active ground floor uses contributing to the public realm within the site that creates a destination point and meeting place.

The subject site is also proximate to the proposed improvements by Dun Laoghaire Rathdown County Council under the Part 8 Application for Active Travel Improvements: DLR Central; which aims to provide high quality pedestrian and cycling infrastructure from Glenageary Roundabout through Glenageary Road Upper to its junction with Kill Avenue/Oliver Plunkett Road/Highthorn Park as per Figure 4 below. The project is currently at detailed design stage.

This scheme will directly further enhance the accessibility and connectivity of the subject site to the wider surrounding area. This range of accessibility by public transport, cycling and by foot allows access to local services, nearby employers and the City Centre.

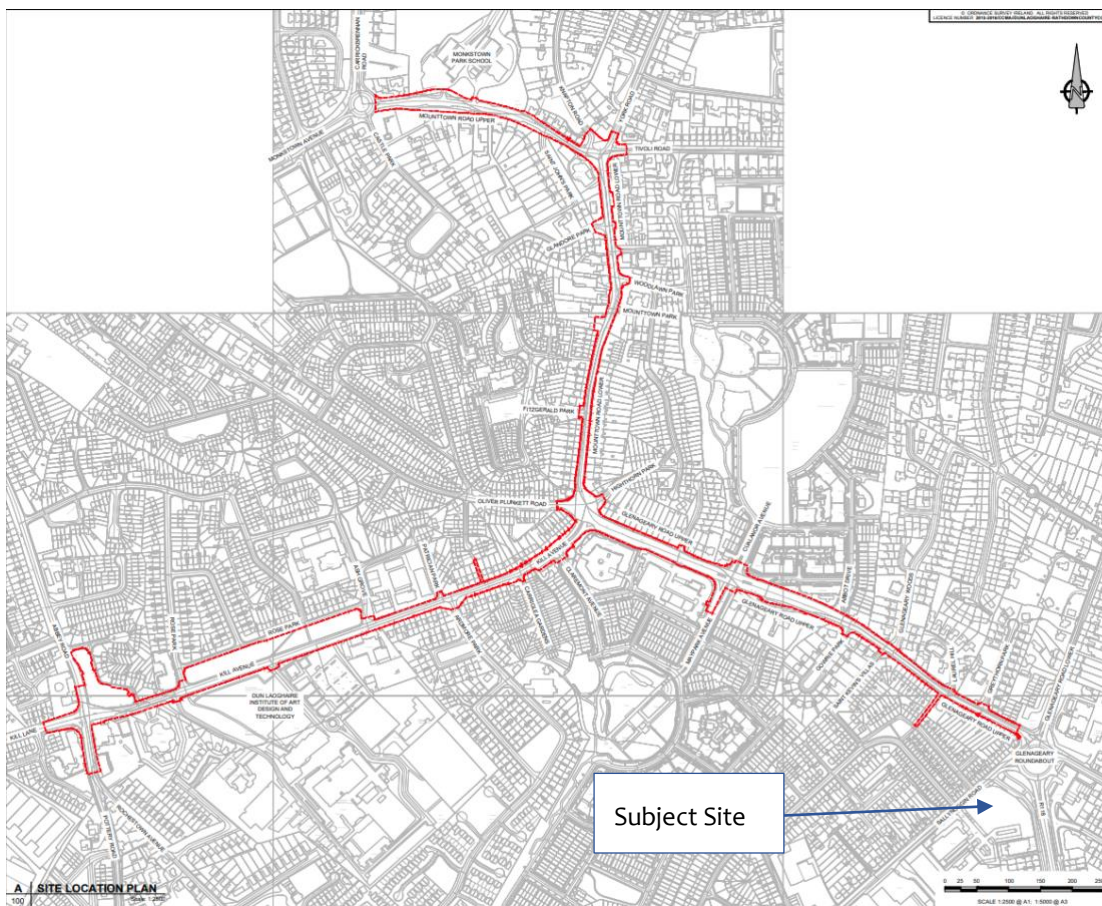


Figure 4 – DLRCC's Active Travel Scheme Proposal in relation to the subject site



5 Planning History

There is an extensive planning history pertaining to the subject site and immediate surrounding which has been given consideration in the design of the scheme. A brief synopsis of the relevant planning history pertaining to the subject site is set out below.

5.1 Subject Site

Reg. Ref. LRD23A/0303 Permission sought for a Large-Scale residential development consisting of 140 no. apartments and 7 no. commercial units, with ancillary open space, car and bicycle parking areas, childcare facility, new access routes and associated site works.

The application has been deemed withdrawn by the Planning Authority on 12th September 2023.

Reg. Ref. D23A/0382 Permission was **GRANTED** for temporary 3-year permission for retention of the boundary treatment to include a block wall ranging in height up to c. 1m and a welded mesh panel fence along the boundary of the site measuring c. 2.3m in height and 256m in length.

Reg. Ref. ABP 312321-21 Permission was **REFUSED** for a strategic housing development at the subject site. The proposal consisted of (i) construction of a Build-To-Rent residential development of 147 no. apartments (9 no. studio, 51 no. one bedroom, 67 no. two bedroom and 20 no. three bedroom) in 4 no. blocks (ranging in height from five to nine storeys over basement level) as follows:

- Block A1 containing a total of 30 no. apartments (1 no. studio, 20 no. one bedroom and 9 no. two bedroom) and measuring five storeys in height;
- Block A2 containing a total of 17 no. apartments (6 no. one bedroom, 7 no. two bedroom and 4 no. three bedroom) and measuring four storeys in height;
- Block B1 containing a total of 31 no. apartments (19 no. two bedroom and 12 no. three bedroom) and measuring part-six part-seven storeys in height; and,
- Block B2 containing a total of 69 no. apartments (8 no. studios, 25. no one bedroom, 32 no. two bedroom and 4 no. three bedroom) and measuring part-seven part-eight part-nine storeys in height.

(ii) all apartments will have direct access to an area of private amenity space, in the form of a balcony, and will have shared access to 807.9sq.m of internal resident's amenities, 2,569sq.m of external communal amenity space (ground level courtyard & 3 no. roof gardens) and 1,409sq.m of public open space; (iii) provision of 113 no. vehicular parking spaces (including 5 no. mobility parking spaces and 15 no. electric charging spaces) 5 no. motorcycle parking spaces and 428 no. bicycle parking spaces at basement floor level accessible via new vehicular access from Glenageary Avenue; (iv) provision of 6 no. commercial units (493.8sq.m total) located at ground floor level in Blocks A1, A2 and B2; and 1 no. childcare facility (201.1sq.m) located within the ground floor level of Block B2; and, (v) all ancillary works including public realm/footpath improvements, landscaping, boundary treatments, provision of internal footpaths, provision of surface level cycle parking (60 no. spaces), bin storage, foul and surface water drainage, green roofs, ESB substation and all site services, site infrastructure and associated site development works necessary to facilitate the development

The reasons for refusal of this application are discussed in further detail in Section 5.2 below along with the Applicant's response to how the scheme subject to this Pre-Planning Meeting request has addressed these reasons for refusal.





Reg. Ref. D14A/0865 Permission **REFUSED** by Dún Laoghaire-Rathdown County Council on 23rd April 2015 but subsequently **GRANTED** by An Bord Pleanála on 6th October 2015. The development consisted of a retirement home, pharmacy and café/restaurant in Block A, medical centre in Block B, supermarket with off-licence in Block C, widening of access onto Sallynoggin Road and parking.

The supermarket (Block C) approved under the application has since been built and completed. As a result, a Lidl supermarket lies directly adjacent to the subject site. However, the approved retirement home (Block A) and medical centre (Block B) have not been constructed.

Extension permission was subsequently **GRANTED** on 16th July 2020 and the works granted under Reg. Ref. D14A/0865 can be completed until 14th January 2026.

Reg. Ref. D05A/0239 Permission was **GRANTED** by Dún Laoghaire-Rathdown County Council on 22nd June 2006 but subsequently **REFUSED** by An Bord Pleanála on 22nd June 2007. The development consisted of the demolition of the existing buildings on site and the construction of 5 residential units, 9,376 sqm of commercial space, 570sqm of community space, 432 parking spaces and associated works.

5.2 Reasons for Refusal of Reg. Ref. ABP 312321-21 – Applicant Design Response to Decision

Reason 1

“Zoning of site is ‘NC’ and BTR is open for consideration subject to the provision of an appropriate mix of uses. It was considered that the proposal lacks active frontages at ground floor level, has a poor quality interaction with the public realm at Glenageary Ave, has a compromised nature of the facades facing Glenageary Roundabout and fails to make a satisfactory contribution to improved linkages between the established neighbourhood centre, NC lands to the north and east, Lidl and adjacent residential areas to the south and west. The proposal was also contrary to the Urban Design Criteria: 1 – Context, 6 – Distinctiveness, 7 – Layout, 8 – Public Realm, 12 – Detailed Design”

Applicant Response:

From the outset, it was the Applicant’s full intention to address the reasons for refusal accordingly as the design progresses in consultation with Dún Laoghaire-Rathdown County Council. The Applicant has a newly appointed a new design team, who provided a fresh outlook on the site constraints and opportunities in the design of the proposed scheme. It was the design team’s full intention for the current proposal to be in accordance with the Urban Design Criteria and provide a scheme that provides an appropriate mix of uses, active frontages at ground floor level and a high-quality interaction with the public realm at Glenageary Avenue. The design strategy, from initial concept stage, took into consideration the Urban Design Criteria in the establishment of a high-quality scheme with an active public realm, active street frontage and improved linkages to the established neighbourhood facilities.

The proposed scheme with its active frontage at ground floor level and the proposed architectural features of an arch create a welcoming pedestrian passageway from the roundabout through an active internal public plaza connecting to the adjoining public realm and neighbouring lands. We refer the Planning Authority to Section 9.1 of this Planning Report which details how the current scheme is in accordance with the Urban Design Criteria.

The provision of retail, restaurant and commercial floor space, in conjunction with the layout of the ground floor level and the aesthetic of the wider scheme, serves to provide an appropriate interface between the subject development and the immediate adjoining public realm. At ground floor level the development will present 7 no. units. The scheme now proposes 2 no. restaurants at the ground floor in Block A and a retail – clothing unit, retail – florist, retail – pharmacy unit and hairdresser unit at ground floor level in Block B. Moreover, the provision of a childcare facility (c. 263 sqm) at ground floor level of Block B serves to further animate the scheme in the context of the neighbourhood centre and provision for the surrounding community.



The commercial units at ground floor level are located facing the public realm and public streets to create an active frontage that will animate the street level. There are 5 no. residential units proposed at ground floor of Block B which will face onto the communal open space. It is thus considered that the subject proposal fulfils the objective of the ‘NC’ zoning “to protect, provide for and-or improve mixed-use neighbourhood centre facilities” by providing an appropriate mix of uses at ground floor level that will animate the streetscape as per Figure 5 below.



Figure 5 – CGI View from Sallynoggin Road

Reason 2

“The proposal failed to meet SPPR 3 in that at both town and streetscape level, the proposed development fails to successfully integrate into the existing character of the area, given the overbearing relationship with adjacent residential properties at Glenageary Ave and the poor quality public realm at Glenageary Ave facing the roundabout, in addition to the poor quality of apartment units in Block B2 close to the basement car park access and of units in Blocks B1 and A2 that immediately adjoin the Lidl Car Park which is contrary to the Urban Development and Building Heights Guidelines.”

Applicant Response:

SPPR3 of the Urban Development and Building Heights Guidelines (2018) sets out the following:

“It is a specific planning policy requirement that where;

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

“At the scale of the relevant city/town:

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.***
- 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, 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.***

- ***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.”***

Applicant’s Response

- The site is well served by public transport including the Glenageary DART Station c. 1.2km or 16-minute walking distance from the subject site. The site also benefits from a QBC along R118 (Glenageary Avenue), and other bus services along Sallynoggin Road. As such, the site is well placed to maximise connections Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area.
- Every effort has been made by the scheme architect and landscape architect to visually assimilate the development with the surrounding built and natural environments to provide a vibrant scheme.
- The proposed development makes a positive contribution to the built and natural environment of this suburban area. The proposal provides generous circulation spaces, paths, public, private and communal open spaces, public plaza and active ground floor frontages creating a visual interest in the streetscape.

“At the scale of district/neighbourhood/street:

- ***The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape***
- ***The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.***
- ***The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).***
- ***The proposal 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.***
- ***The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”***

Applicant’s Response

- The landscape proposal greatly enhances tree and shrub planting on site with pockets of planted communal and public open spaces dispersed throughout the development, creating an improved sylvan residential setting.
- Materials and finishes shall be well considered as the design of the scheme progresses to respond to the surrounding environment.
- The proposal submitted enhances the urban design context and provides generous public and private open spaces, paths, public plaza and active uses and creates a visual interest in the streetscape and enhances a sense of scale and enclosure.
- The proposal makes a positive contribution to the improvement of legibility through the subject site into the wider urban area through the provision of active frontages at ground floor level and the creation of a welcoming entrance passageway from the roundabout through an active internal public plaza connecting to the adjoining public realm and neighbouring lands.
- The orientation of the blocks and setbacks from the front boundary is appropriate and in keeping with the surrounding settings.
- The apartment unit mix of 1, 2 and 3 bed units enhances the housing tenure of the detached suburban housing typology found in the wider area. The apartment mix proposed is as follows:
 - 37 no. 1-bed units (27%)
 - 68 no. 2-bed units (49%)
 - 6 no. 2-bed 3-person units (4%)
 - 27 no. 3-bed units (20%)



It is submitted that the scheme currently proposed meets the requirements of SPPR3 and successfully integrates into the existing character of the area and does not cause an overbearing relationship with adjacent residential properties. The height of the development has been reduced significantly from the previously refused scheme and it is now considered that the subject scheme proposed provides appropriate height and the development at its highest of 7 storeys is positioned in the least sensitive areas of the site and provides appropriate setbacks. It is our professional planning opinion that the inclusion of heights ranging from 4 to 7 storeys at the subject site can be readily absorbed without any undue impact on the character of the area or the amenity of neighbouring residential developments.

We trust that the submitted scheme addresses the concerns of the Planning Authority in this regard.



6 Section 247 Pre-Planning Meeting and Section 32 LRD Meeting

6.1 Section 247 Meeting – PAC/LRD1/021/23

The evolution of the scheme has been brought about by engagement with the Planning Authority of Dún Laoghaire-Rathdown County Council (DLRCC). The Applicant and Design Team formally engaged in preliminary discussions with the Planning Authority presenting a draft outline of the proposed development.

Comments from the Dún Laoghaire-Rathdown County Council representatives present at this meeting were considered and the design team prepared an updated proposal based on the feedback received.

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted. Where the Applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

6.1.1 Pre-Planning Proposal

The proposal submitted provided for a Large-Scale Residential Development, which in summary, shall deliver the following:

- 145 no. residential units each with a private balcony in 2 no. interlinked blocks ranging in height from 4-7 storeys.
- Creche and c. 231.4 sqm creche play area, residential amenity space and 7 no. commercial and retail units at ground floor level.
- 85 no. car parking spaces, 2 no. accessible spaces, 412 no. bicycle parking spaces and bin store at basement level accessed off Glenageary Avenue.
- Public plaza (c. 957.2 sqm)
- C. 3,176sqm communal open space accessible from the residential amenity space and a roof terrace (c. 151 sqm) at link between Block A and Block B.
- All boundary treatment and landscape works;
- Site service connections;
- All site development works.

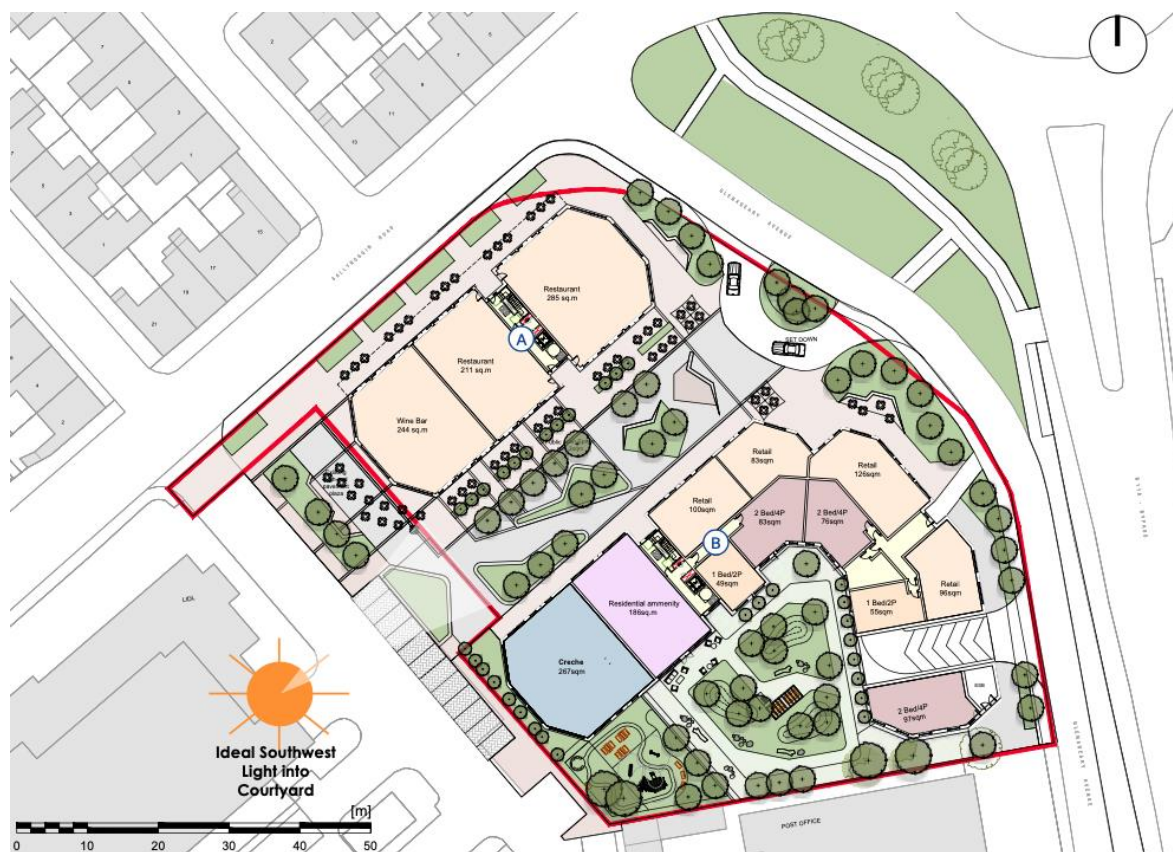


Figure 6 – Proposed S247 Design Ground Floor Plan



Figure 7 – Proposed S247 Design Typical Floor Plan

6.1.2 Pre-Planning Comments

Below is a summary of the points raised by DLRCC at this meeting and the Applicant's response:

Overall Proposal & Layout:

- DLRCC agreed that there is a good distribution of uses proposed at ground floor level but raised potential of noise impacts and odours which would need to be addressed as design progresses.

Applicant Response:

The concerns of the Planning Authority were taken into consideration as the design of the scheme progressed. We refer the Planning Authority to the Odour Mitigation Statement prepared by JAK Engineers which identifies that the ventilation ductwork carrying odours from the ground floor restaurant kitchens have been designed to transmit from the ground floor internally to roof level where they will be terminated to atmosphere.

- Rationale to be provided as to how the proposed uses tie into NC zoning objective.

Applicant Response:

The subject proposal fulfils the objective of the 'NC' zoning "to protect, provide for and-or improve mixed-use neighbourhood centre facilities" by providing an appropriate mix of uses of residential and a broad range of commercial uses at ground floor level including a childcare facility. All of the uses proposed are permitted in principle under this zoning objective. The commercial units at ground floor level are located facing the public realm and public streets to create an active frontage and animate the street level. Additionally, a new public plaza makes a positive contribution to the Neighbourhood Centre.

The proposed scheme with its active frontage at ground floor level and the proposed architectural features of an arch creates a welcoming pedestrian passageway from the roundabout through an active



internal public plaza connecting to the adjoining public realm and neighbouring lands. The public realm upgrades proposed as part of this development will transform the currently underutilised land within and surrounding the development site to create a quality mixed use environment. The vision for the project scheme is to create a unique sense of place with a strong community identity characterised by the public plaza will act as prominent focal point set within the area.

The subject proposal supports and enhances the neighbourhood centre designation of the site at Glenageary Roundabout.

- Concerns were raised in terms of cumulative heights and proximity to boundaries with Sallynoggin Road.

Applicant Response:

The scheme responds to its surrounding context through the provision of a gradual increase in height from the prevailing contextual height to transition to increased development height between 4 to 7 storeys with a stepped approach to create a variety and visual interest and to comply with the cumulative heights strategy. The site occupies a strategic position as a corner site in urban design terms with the potential to create a focal point at the Junction of Sallynoggin Road and Glenageary Avenue. The subject scheme proposed provides appropriate height and the development at its highest of 7 storeys is positioned in the least sensitive areas of the site and the development proposed provides appropriate setbacks. The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this suburban vacant site. We refer the Planning Authority to the Townscape Visual Impact Assessment prepared by Parkhood Landscape Architects which concluded that the proposal would result in a positive contribution to the townscape character and urban fabric of the surrounding area and can be successfully absorbed into the character and views of this part of the city.

- DLRCC concerned that not enough screening/buffer has been provided between creche unit and Lidl car park and asked to ensure that the playground for the creche is well overlooked and not overshadowed.

Applicant Response:

Hedge planting is proposed as part of the Landscape Masterplan to enclose and screen the creche and dedicated outdoor play area from adjacent roads and car parking. The outdoor play area is well overlooked by the facility and apartments above and we refer the Planning Authority to the Daylight & Sunlight Assessment prepared by 3D Design Bureau which shows that the outdoor open spaces will not be subject to overdue overshadowing.

Transportation:

- DLRCC raised that an increased car parking provision may be sought.

Applicant Response:

It is respectfully submitted to the Planning Authority that given the site's proximity to high frequency public transport and walkability to local services, a relaxation of the car parking requirements for this site is considered appropriate. We refer the Planning Authority to Section 10.5.10 of this Report for the assessment criteria for deviation from car parking standards as set out in 12.4.5.2 (i) of the County Development Plan. We also refer the Planning Authority to the Traffic and Transport Assessment prepared by AECOM for further information herewith.

- Arrangements should be made clear for bin truck access.

Applicant Response:

Bins stored in the basement will be brought to surface level at the designated bin pick up/drop off area adjacent to the basement access on waste collection days. A swept path assessment demonstrates that a 10.2m refuse lorry will be able to safely access the bin store at the access point to the basement and has been illustrated on drawing no.60690914-ACM-01-00-DR-CE-10-0102 prepared by AECOM.





- Set down and loading areas should be identified.

Applicant Response:

3 no. set down areas/loading bays are proposed. A set down area/loading bay is proposed on surface level at Sallynoggin Road and 2 no. set down area/loading bay, 1 no. accessible car parking space and 2 no. visitor car parking spaces are proposed at surface level at Glenageary Avenue.

- A path analysis should be carried out for the vehicular access.

Applicant Response:

A path analysis has been prepared by AECOM and the proposed access arrangement is illustrated on drawing no. 60690914-ACM-00-00-DR-CE-10-0001.

Drainage:

- Further details should be provided for green roofs and proposal should take into account new Development Plan requirements for green roofs and climate change.

Applicant Response:

In response to the comment above we refer the Planning Authority to the Roof Plan on drawing no. GAV-JFA-ZZ-07-DR-A-PP2007 prepared by John Fleming Architects which illustrates that 70% of the total roof areas shall be reserved for green roofs.

We also refer the Planning Authority to the Sustainability and Services Report prepared by JAK Engineers which includes a Climate Change Adaptation Statement. In addition, we refer the Planning Authority to the Climate Change Impact Assessment prepared by Enviroguide Consultants.

- Further details should be provided on drainage connection through 3rd Party Lands as it was considered undesirable.

Applicant Response:

It is proposed to discharge the surface water to the existing 3rd party surface water sewer which the adjoining site (Lidl Supermarket) is discharging to, which falls south-west parallel to Sallynoggin Road. This pipe is within the ownership of the adjacent landowner (Lidl GmbH supermarket) and a Letter of Consent has been obtained to allow a connection from the proposed development.

AECOM engaged with DLRCC during a previous application for this site regarding the alignment of the existing surface water sewer adjacent to Sallynoggin Road, and Slit trenches were undertaken to confirm the location of the pipe, which was confirmed to be within the site boundary.

6.2 Section 32 LRD Meeting – PAC/LRD2/004/23

A subsequent LRD Meeting was held with the Planning Authority on 21st September 2023.

The proposal submitted provided for a Large-Scale Residential Development, which in summary, consisted of the following:

- 147 no. residential apartment units (59 no. 1 bedroom, 77 no. 2-bedroom (4 person), 8 no. 2 bedroom (3 person) and 3 no. 3 bedroom) each with a private balcony / terrace in 2 no. interlinked blocks ranging in height from 4-7 storeys.
- Creche and c. 263 sqm with associate creche play area (c. 36.1 sqm), residential amenity space approx. 341.7 sqm and 7 no. commercial and retail units at ground floor level to include (a) 2 no. restaurants in Block A (c. 528 sqm), (b) a retail – clothing unit (c. 142 sqm), c) retail - florist unit (c. 66 sqm), (d) pharmacy - retail unit (c. 126 sqm) and (e) hairdresser units (c. 100 sqm) all in Block B.
- 80 no. car parking spaces, 2 no. accessible spaces, 286 no. bicycle parking spaces and bin store at basement level accessed off Glenageary Avenue.
- Public plaza (c. 1,848.4 sqm) accommodating outdoor seating, planting, pedestrian and cyclist links.



- C. 780.6sqm communal open space accessible from the residential amenity space of Block B and a roof terrace (c. 151 sqm) at link between Block A and Block B.
- All boundary treatment and landscape works;
- Site service connections;
- All site development works.



Figure 8 – Proposed S32 LRD Meeting Site Layout

We now refer the Planning Authority to the Statement of Response to LRD Opinion Report prepared by Brock McClure Planning Consultants for a summary of the points raised and the Applicant's response.

6.3 Pre Planning Conclusion

As evidenced above, all feedback from Dún Laoghaire-Rathdown County Council has been closely considered in the design of the proposal. We trust that the final proposal submitted addresses the concerns raised by the Planning Authority at the Section 247 Meeting and subsequent LRD Meeting and Opinion.

In this regard it is submitted that the mixed-use, neighbourhood centre development as proposed has evolved to be a high-quality development completely adherent to local and national standards and guidelines and fully in accordance with the proper planning and sustainable development of the area. An outline of the final proposed development is now provided for Dún Laoghaire-Rathdown County Council below.



7 Description of Proposed Development

7.1 Summary of Proposed Development

Red Rock Glenageary Ltd., intend to apply to Dún Laoghaire Rathdown County Council for a Large-Scale Residential Development on a site of 0.74 ha at Junction of Sallynoggin Road and Glenageary Avenue, and Glenageary Roundabout, Glenageary, Co. Dublin.

The proposed development will consist of a new neighbourhood centre to include apartments, commercial and retail units, public plaza, childcare facility and all associated residential amenity spaces.

The proposed development includes:

- a) Construction of 138 no. residential apartment units (37 no. 1-bedroom units, 68 no. 2-bedroom (4 person units), 6 no. 2-bedroom (3 person units) and 27 no. 3-bedroom units) in 2 no. interlinked blocks at third to fifth floor level (ranging in height from four to seven storeys over basement level) consisting of:
 - i. Block A (5-6 storeys) comprising 41 no. apartments (8 no. 1-bedroom units, 17 no. 2-bedroom (4 person) units, 2 no. 2-bedroom (3 person) units and 14 no. 3-bedroom units).
 - ii. Block B (4-7 storeys) containing 97 no. apartments (29 no. 1-bedroom units, 51 no. 2-bedroom (4 person) units, 4 no. 2-bedroom (3 person) units and 13 no. 3-bedroom units).

Each residential unit has associated private open space in the form of a balcony/terrace.

- b) Residential amenity areas of approx. 342 sqm are proposed in the form of resident support services, concierge services, co-working space, social/activity spaces and gym at the ground floor level of Blocks A and B.
- c) Open Space (approx. 2,806.6 sqm) is proposed in the form of (a) public open space (c. 1,848.4 sqm) in the form of a public plaza accommodating outdoor seating, planting, pedestrian footpaths and cyclist links and (b) residential/communal open space (approx. 958.2 sqm) including c. 750.6 sqm at surface level (incl. playground), roof terrace at fifth floor level of link between Blocks A and Block B (c. 151 sqm) and roof terrace (c. 56.6 sqm) at fifth floor level of Block B. 1.8 m opaque screens are proposed around both roof gardens.
- d) Commercial and retail uses at ground floor level of Blocks A and B (c. 996 sqm) to include (a) 2 no. restaurants (c. 267 sqm and 295 sqm) in Block A, (b) a retail – clothing unit (c. 142 sqm), (c) retail - florist unit (c. 66 sqm), (d) retail - pharmacy unit (c. 126 sqm) and (e) hairdresser unit (c. 100 sqm) all in Block B.
- e) Childcare facility (c. 263 sqm) with dedicated open space and children's play area (c. 39.5 sqm) at ground floor level of Block B.
- f) Basement areas (total approx. 3,411 sqm) are proposed on one level and include car and bicycle parking areas, waste management and plant areas. An ESB substation (approx. 31.7 sqm) is proposed at surface level at the top of the basement ramp accessed off Glenageary Avenue. Commercial bin stores (c. 47.9 sqm) are proposed to be located at ground floor level of both Blocks A and B.
- g) A total of 80 no. car parking spaces at basement level are proposed to include 3 no. accessible parking spaces, 2 no. GoCar spaces and 17 no. EV charging spaces. 5 no. motorcycle parking spaces are also proposed at basement level.
- h) A set down area/loading bay is proposed at surface level at Sallynoggin Road and 2 no. set down areas/loading bays including 1 no. accessible car parking space are proposed at surface level at Glenageary Avenue.



- i) A total of 310 no. bicycle parking spaces to include 254 no. bicycle parking spaces at basement level including 10 no. cargo bicycle spaces and 56 no. bicycle parking spaces including 16 no. cargo bicycle spaces at surface level.
- j) The development shall be served via a new vehicular access point to the basement level from Glenageary Avenue. New pedestrian and cyclist access points will be provided onto Sallynoggin Road and Glenageary Avenue from the site.
- k) Removal of existing cycle path and footpath and dropped kerb pedestrian crossing at Glenageary Avenue to be reinstated by soft landscaping and replaced by a new shared cyclist and pedestrian raised table crossing point located on Glenageary Avenue linking to the existing signalised crossing on the R118. Existing 1.2 m pedestrian crossing on Glenageary Avenue to be widened to 2 m.
- l) Emergency services/servicing access is proposed from Sallynoggin Road and Glenageary Avenue.
- m) All associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposal; permeable paving; all landscaping works; green roofs; roof plant room and general plant areas; photovoltaic panels; landscaped boundary treatment; footpaths; public lighting; and electrical services.

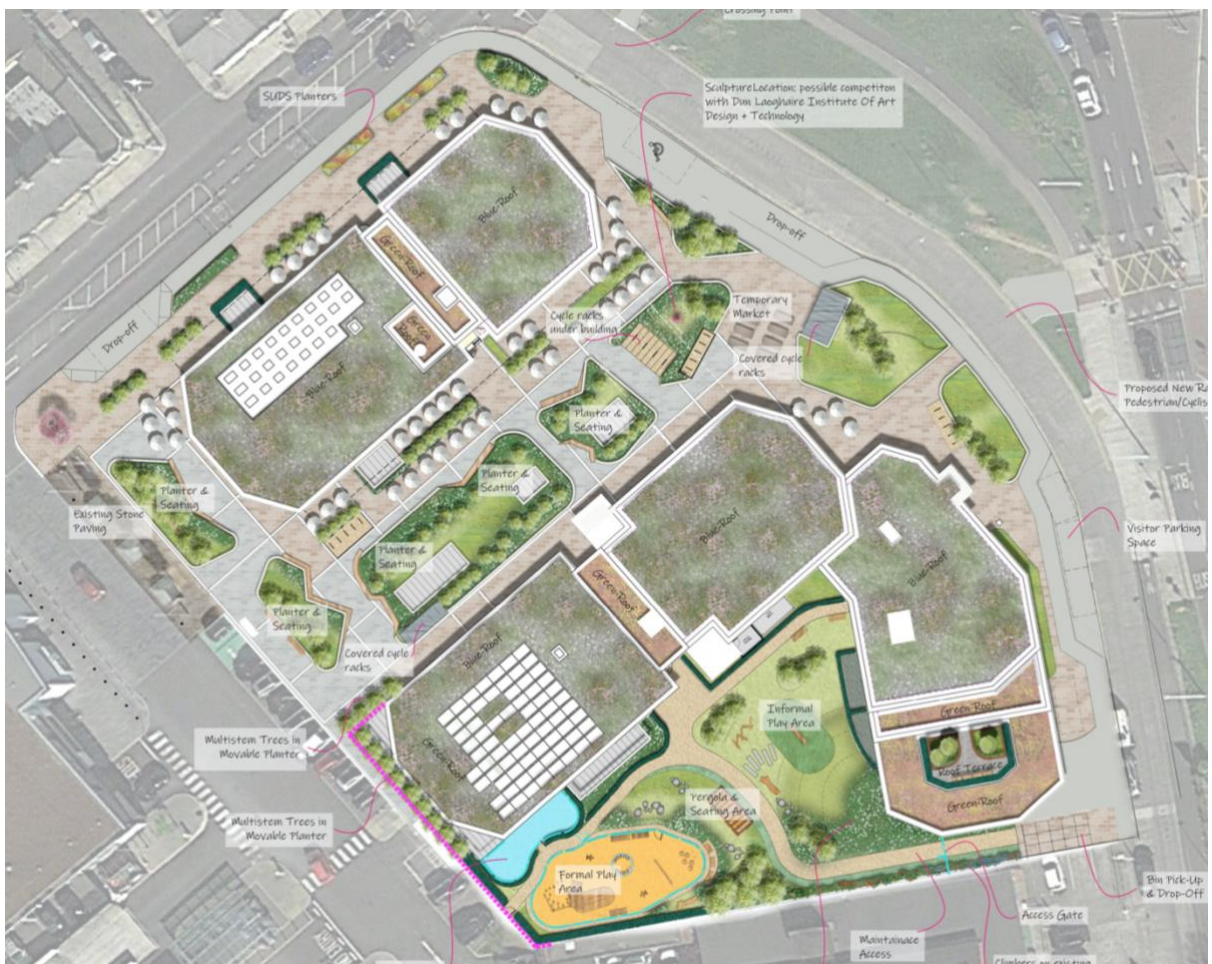


Figure 9 – Proposed Site Layout Plan

7.2 Detailed Description

Residential Mix

The residential development mix provides for 138 no. units as follows:

- 37 no. 1-bedroom units (27%)
- 68 no. 2-bedroom units (49%)
- 6 no. 2-bedroom (3-person) units (4%)
- 27 no. 3-bedroom units (20%)

Block	1 bed units	2 bed units	2 bed (3p) units	3 bed units	Total
A	8	17	2	14	41
B	29	51	4	13	97
Total	37	68	6	27	138

Table 1 – Unit breakdown per Block

Residential Density

A residential density of 186 units/ha is proposed on this site. The density is based on 138 units over the 0.74 ha site. The density proposed is considered acceptable given the mandate in national planning policy and the connectivity to public transport within walking distance to the site.

Height

Proposals for height are considered to align with the national policy mandate to increase height and densities at appropriate locations. Specifically, the Building Height Guidelines (2018) set out that there is a presumption in favour of buildings of increased height in locations with good public transport accessibility. Blanket numerical limitations on height should be avoided and a set of Development Management Criteria should be applied to test the appropriateness of the heights proposed.

The scheme responds to its context through the provision of a gradual increase in height from the prevailing contextual height to transition to increased development height between 4 to 7 storeys with a stepped approach to create a variety and visual interest and to comply with the cumulative heights strategy. The increased height will provide a focal point at Glenageary Roundabout. The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this suburban vacant site.

The subject proposal and its height has also been assessed against the Urban Development and Building Height Guidelines, 2018 and we refer the Planning Authority to Section 9.8 of this Report for further information in this regard.

In addition, we refer the Planning Authority to the Townscape and Visual Impact Assessment prepared by Parkhood Landscape Architects which concludes that the proposal would result in a positive contribution to the townscape character and urban fabric of the surrounding area and can be successfully absorbed into the character and views of this part of the city.

Figure 10 below shows an aerial view of the subject site with proposed development and it is our opinion that the proposed height, scale and massing is appropriate and are well-absorbed into the character of the surrounding area.



Figure 10 – Aerial view of proposed development and surrounding area

Landscaping and Open Space

The proposed development delivers quality designed landscaped open spaces distributed throughout the site. The landscaped open space areas and elements are divided between several locations throughout the site which gives residents a variety of open space areas to avail of. A total of approx. 2,750 sqm open space is proposed in the form of:

- Public Open Space (c. 1,848.4 sqm) in the form of a public plaza accommodating outdoor seating, planting, pedestrian and cyclist links;
- Residential/communal open space (c. 958.2 sqm) including c. 750.6 sqm at surface level including an enclosed playground, roof terrace at the fifth floor link of Block A and Block B (c. 151 sqm) and roof terrace at fifth floor level of Block B.

We refer the Planning Authority to the enclosed drawings and Landscape Design Statement prepared by Parkhood Landscape Architects. The Landscape Design Statement demonstrates that the scheme prepared for this development is founded on a strong awareness of the site context and the established landscape character.

The central public plaza has been designed to allow permeability across the site to allow permeability across the site along the established desire path. Entrance to the public plaza is under a bridge or gate heralding the entrance to the scheme which encloses the public open space. The landscaping proposals create a striking and inviting entrance off Glenageary Avenue into the public plaza area. There is opportunity and space within the public realm fronting Glenageary Avenue to allow for the occasional use of market stalls. The subject development also proposes to hold a competition in partnership with Dun Laoghaire Institute of Art Design + Technology for a sculptural / art installation to be displayed on a podium within the entrance to the public plaza to act as a central and focal feature.

It is noted that in response to the LRD Opinion, the overall quantum of hardscaping has been reduced in favour of more soft landscaping in the public plaza area and around the perimeter of the site at the interface with Sallynoggin Road and Glenageary Avenue. The landscape proposal greatly enhances tree and shrub planting on site with pockets of planted communal and public open spaces dispersed throughout the development, creating an improved sylvan residential setting.

It is highlighted to the Planning Authority that due to the fire tender access arrangements, there are limited opportunities to provide enhanced soft landscaping proposals between Blocks A and B. We refer the Planning Authority to the accompanying Landscape Design Booklet prepared by Parkhood Landscape

Architects and Drawing No's. 7655-L-1300-HARDSCAPE PLAN; 7655-L-1303-WAYLEAVE STUDY and; 7655-L-1304-FIRETENDER STUDY for further information in this regard.

Raised planter beds are proposed within the public plaza comprising of a 450 mm high planter wall that will also allow integrated seating as inspired by the area outside Peoples Park, Dún Laoghaire.



Figure 11 – Proposed Raised Planter Beds with Seating

Block B surrounds and encloses the south facing communal open space (c. 750.6 sqm) which will be exclusive to the residents of the scheme and has comprehensive landscaping proposals are included for the proposed development including a range of facilities for children of different ages, parents and the elderly.

Residential communal open space is also proposed in the form of 2 no. roof gardens at link between Block A and Block B and at fifth floor level of Block B equating to c. 207.6 sqm. All future residents of the scheme will have access to a roof terrace. following the receipt of the LRD Opinion, a roof terrace was introduced at fourth floor level of Block B1 which has a separate core to Blocks A and B1. Access to this roof terrace is available for all future residents of Block B2 from all floor levels by lift or stairs.

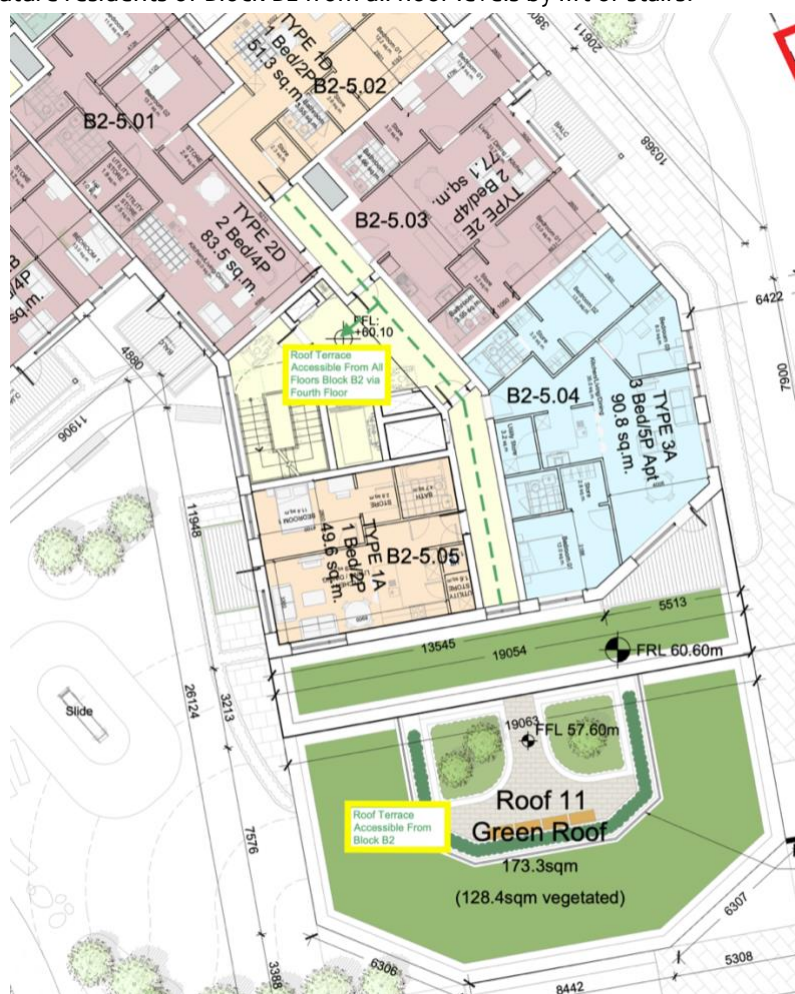


Figure 12 – Block B2 roof terrace access diagram

The future residents of Block A and Block B1 will have access to the roof terrace at the link of Block A and B1. Access to this roof terrace is available for all future residents of Block A and B1 from all floor levels by lift or stairs as shown in Figure 13 below.



Figure 13 – Roof Terrace Between Block A and B1 Access Diagram

We highlight that a vibrant and multi-functional communal open space is provided to the south of Block B which benefits from safety, is free from cars and passive surveillance and can provide a space that offers a formal, enclosed small children's play area, informal play facilities, picnic areas and benches. Section 12.8.9 of the County Development Plan notes that "Play Facilities should incorporate the Nature-based play philosophy and approach to play provision." A series of nature-based play spaces are proposed which express a new direction in early learning environments and provide a range of diverse and flexible play spaces which lead to tactile experiences and nature play without ever prescribing the use of the areas.

Section 12.8.9 of the County Development Plan further notes that: "Children's play needs around the apartment building should include:

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

We note that the formal children's play area measures 127.5 sqm and includes a range of facilities for children of different ages and spaces for parent / guardian supervision.

In addition, we note to the Planning Authority that the proposed childcare facility has its own dedicated outdoor play area for creche use only with the flexibility to use the communal formal and informal children's play area.

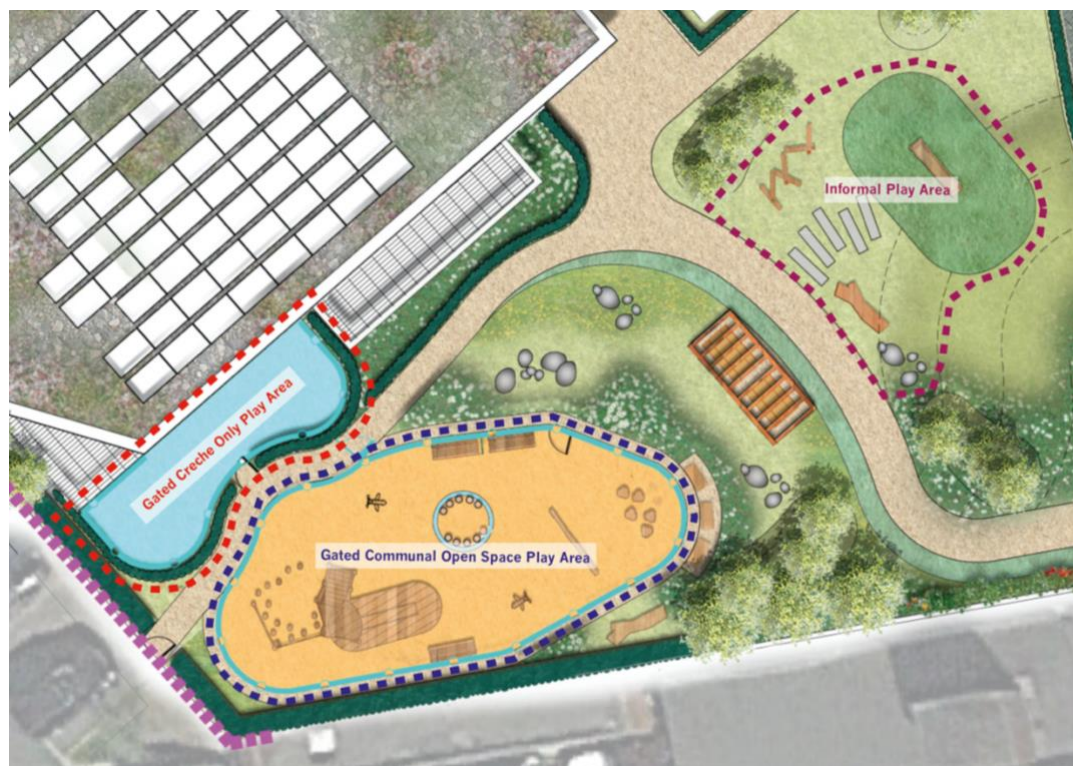


Figure 14 – Formal and Informal Children's Play Areas Diagram

The landscaping proposals enhance the development and ensures that the individual amenity of the units and wider residential amenity of the scheme is of high quality.

Private Open Space

All apartments have access to private open space in the form of balconies or terraces in compliance with the standards set out in the 2022 Apartment Guidelines.

Dual Aspect

The scheme provides 49% dual aspects units, 67 no. units in total as identified on the enclosed Housing Quality Assessment.

Part V Proposal

The proposal provides for 14 no. Part V residential units within the scheme (10% of the total 138 no. units), which meets the social housing requirements of Dun Laoghaire-Rathdown County Council. These units are identified in Proposed Part V Layout Plans prepared by John Fleming Architects. Full details are enclosed with this application including costings and engagement with Dún Laoghaire-Rathdown County Council's Housing Department.

Refuse Storage Arrangements

Each apartment unit is provided with sufficient internal storage space to facilitate a 3 bin-system. Dedicated communal refuse storage areas are also provided at basement level which again, will facilitate the collection of mixed dry recyclables, organic waste and residual waste.

The communal storage areas at basement floor level have been designed such that:

- There is sufficient space to cater for the needs of the residents
- They are discreetly located and suitably screened
- The layout has been designed to cater for people of all abilities

- The location and layout have been designed to facilitate easy access for waste collectors at surface level
- Appropriate ventilation and washdown facilities are provided in the interest of public health and hygiene

2 no. bin commercial refuse storage areas are located within both Blocks A and B.

We refer the Planning Authority to the Operational Waste Management Plan (specifically Section 5.3 and Appendix 2) prepared by AWN Consultants accompanying this Report which sets out the requirements for waste management for the proposed development. In addition, Drawing No. 60690914-ACM-01-00-DR-CE-10-0102 prepared by AECOM illustrates the swept path analysis prepared using Autodesk Vehicle Tracking which shows that the refuse vehicles will not impede vehicular movements on Glenageary Avenue or pedestrian / cyclist movements along the footpaths.

We note that 2 no. refuse storage areas have been provided at basement level for residential use and 2 no. refuse storage areas have been provided at ground floor level of both Blocks A and B for commercial use. On waste collection days, bins from the proposed development will be brought to collection / staging areas by the waste contractor / facilities management prior to collection. The figures below illustrate the proposed waste storage areas and associated staging areas.

The waste collection area for the residential waste is located at the top of the basement ramp, in close proximity to the set down / loading bay. The collection point does not obstruct the ramp or access to the basement parking. Commercial bins will be staged and collected at the loading bay on the northern side of the development on Glenageary Avenue. Bins will be returned to their storage areas immediately following collection. The collection / staging areas are located in such a way so as to not obstruct traffic or pedestrians allowing a footway of at least 1.8 m.

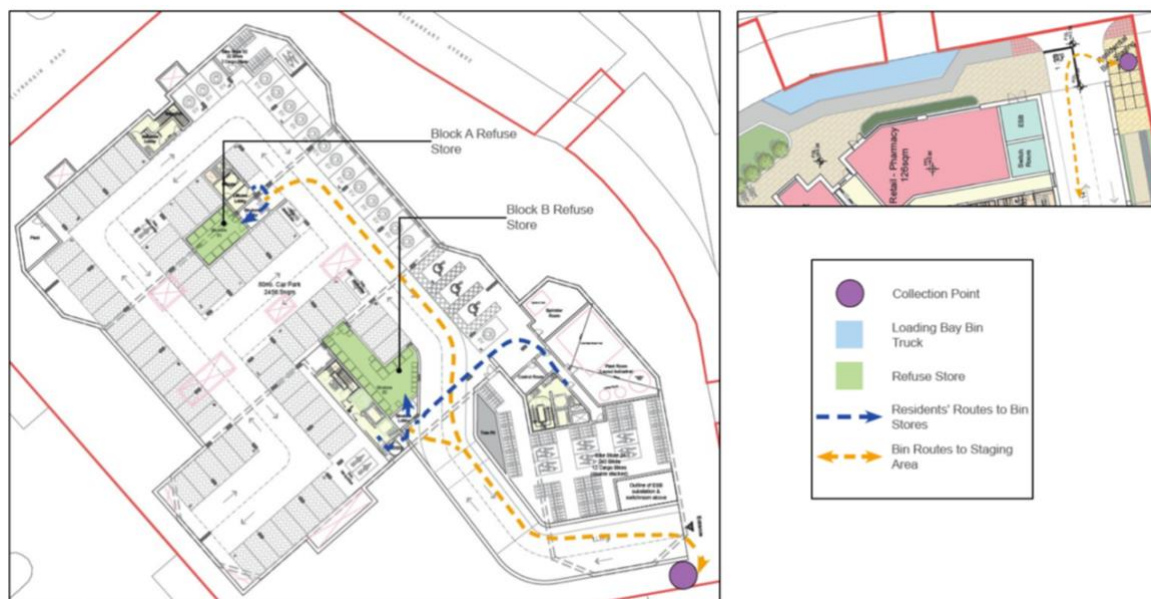


Figure 15 – Residential Waste Storage, Movement and Staging Area



Figure 16 – Commercial Waste Storage, Movement and Staging Area

Car Parking

A total of 80 no. car parking spaces at basements level are proposed to include 3 no. accessible parking spaces and 17 no. EV charging spaces. A set down area/loading bay is proposed at surface level at Sallynoggin Road and a set down area/loading bay, 1 no. accessible car parking space and 2 no. set down / loading areas are proposed at surface level at Glenageary Avenue.

Bicycle Parking

A total of 254 no. bicycle parking spaces to include 10 no. cargo bicycle spaces are proposed at basement level and 56 no. bicycle parking spaces including 16 no. cargo bicycle spaces are proposed at surface level.

Access

Appropriate access points are provided to the development – both pedestrian and vehicular. As the proposed development occupies a corner site at a crossroads footpaths are provided along all street edges. The proposed development provides for unimpeded access between the subject site and the Lidl site. Vehicular entrance is proposed at Glenageary Avenue allowing cars to access the basement level.

The proposal also provides an improved pedestrian access experience across Glenageary Avenue. At design stages, AECOM Consulting Engineers liaised directly with the DLRCC Transport Planning Department prior to the submission of the LRD application and the following has been agreed to be proposed as part of this application:

- A new raised table, complete with a 4m wide uncontrolled shared pedestrian / cyclist crossing proposed on Glenageary Avenue, matching the desire line as requested.
- The existing pedestrian crossing on Glenageary Avenue, at the junction between Glenageary Avenue and Sallynoggin Road; is proposed to be increased in width from 1.2 m to 2 m wide.

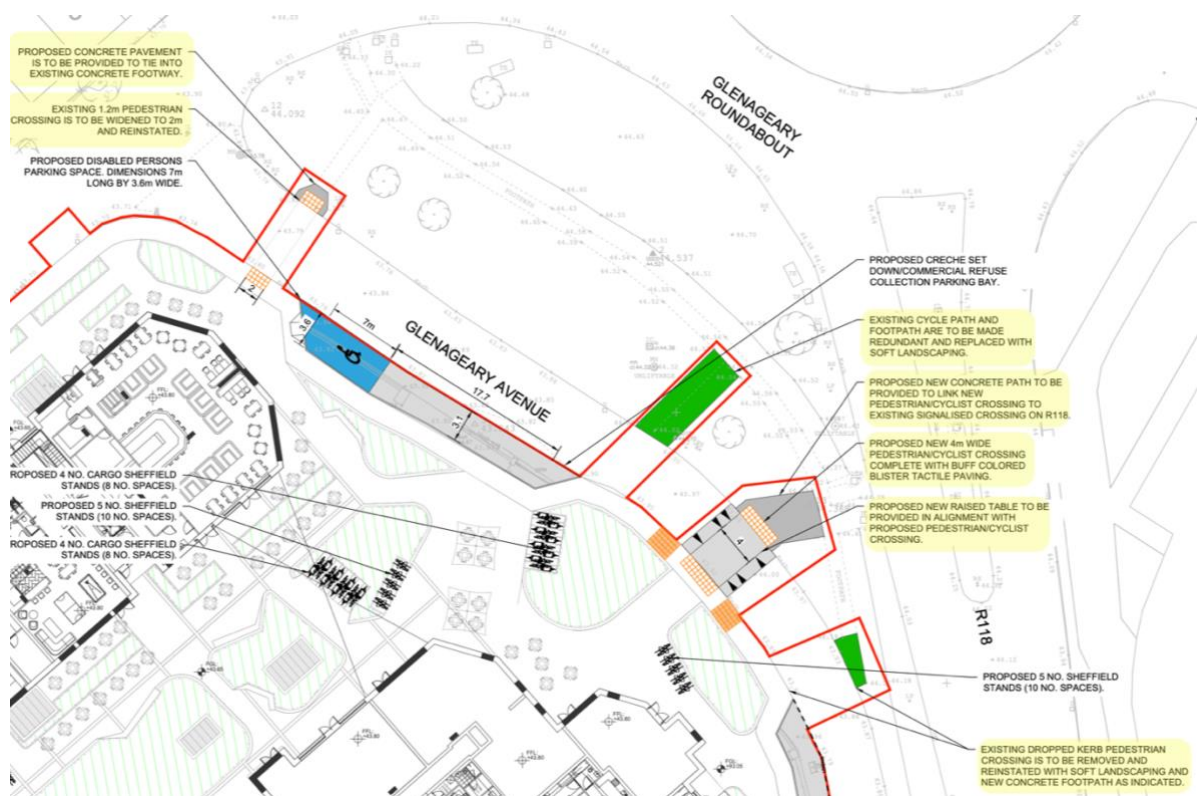


Figure 17 – Proposed Pedestrian Crossings on Glenageary Avenue

We refer the Planning Authority to the originally submitted AECOM Drawing No. 60690914-ACM-00-00-DR-CE-10-0001 illustrating the proposals agreed with DLRCC's Transport Planning Department to improve pedestrian and cyclist connectivity.

Childcare Provision

A childcare facility of c. 263 sqm is proposed at ground floor level of Block B. The childcare facility has been designed to provide for the childcare needs of the proposed development with a capacity of 47 no. children. The creche is afforded an appropriate outdoor play area (c. 39.5 sqm).

Commercial Element

As the subject site is zoned for Neighbourhood Centre uses, the scheme comprises a broad range of appropriate uses to support and enhance the neighbourhood centre designation of the site at Glenageary Roundabout.

The total commercial floor area amounts to 996 sqm, which will provide a lively mix of uses across various times of the day and evening for both the existing and new residential communities in the area. All of these units are located at ground floor level and open onto the public plaza and frontage onto both Sallynoggin Road and Glenageary Avenue. The uses surround the residential amenity spaces at ground floor level encouraging engagement between the new and current residents of the area.

The proposed scheme, along with the existing uses in the area including Lidl and the existing Glenageary Shopping Centre, will complete an active commercial frontage to Glenageary Roundabout and make this a destination in the locality.

Block Location	Unit Type	Floor Area (sqm)	Use (Public/Private)
Block A	Restaurant	267 sqm	Public
	Restaurant	295 sqm	Public
Block B	Childcare Facility	263 sqm	Public
	Hairdresser/Barber	100 sqm	Public
	Retail - Clothing	142 sqm	Public
	Retail - Florist	66 sqm	Public
	Retail - Pharmacy	126 sqm	Public

Table 2 – Breakdown of Proposed Commercial Units



Figure 18 – CGI View from Sallynoggin Road

Residential Amenity Spaces

2 no. residential amenity spaces of approx. 342 sqm are proposed in the form of resident support services, concierge services, communal storage, co-working space, social / activity spaces and gym at the ground floor of Blocks A and B.

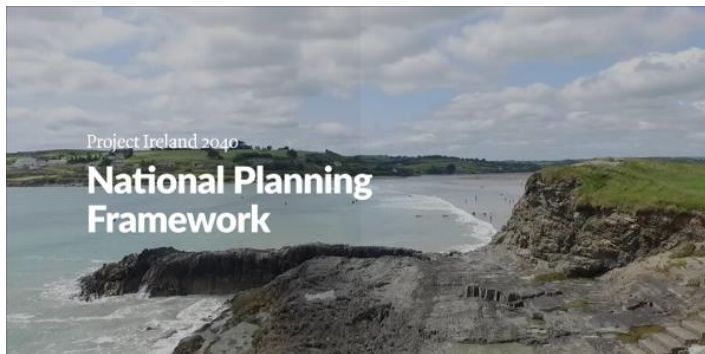
8 Statement of Consistency – Strategic Planning Context

8.1 Strategic Planning Policy Documents

It is our considered opinion that the key policy documents for consideration as part of this Statement of Consistency are identified as follows:

- National Planning Framework – Project Ireland 2040
- Rebuilding Ireland: Action Plan for Housing and Homelessness
- Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031
- Regional Planning Guidelines for the Greater Dublin Area 2010–2022
- Design Manual for Urban Roads and Streets 2019
- Smarter Travel – A New Transport Policy for Ireland 2009-2020
- Transport Strategy for the Greater Dublin Area 2016-2035
- Sustainable Residential Development in Urban Areas (2009)
 - i. Urban Design Manual - Best Practice Guidelines
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2018)
- Urban Development and Building Height Guidelines (2018)
- Housing for All – A New Housing Plan for Ireland (2021)

8.2 National Planning Framework – Project Ireland 2040



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. It caters for:

- The extra one million people that will be living in Ireland by 2040.
- The additional two thirds of a million people working in Ireland by 2040; and
- The half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, this Plan sets out the long-term context for the Country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high - level objectives of the Plan are:

- To continue a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.

- To ensure that Ireland's many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth.

It is worth highlighting that the projected level of population and jobs growth in the Eastern and Midland Regional Assembly area respectively represents 475,000 - 500,000 additional people and 330,000 additional jobs by 2040.

The national planning framework promotes the creation of mixed tenure communities by stating *“More affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities.”*

The NPF recommends the following in relation to compact urban development *“At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.”*

It is also apparent from the NPF that low-density housing development, and underused sites, have been a feature of Ireland's housing landscape in cities, towns, and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in the urban areas.

The site's zoning allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.

It is submitted that the current proposal for 138 no. new residential units and a childcare facility will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies is appropriate at this highly accessible site, catering to a wide demographic of potential future residents.

The following policies are considered key in the context of this site:

National Policy Objective 1 -

Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million.

National Policy Objective 3a -

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 6 -

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 11 -

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13 -

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.

National Policy Objective 31 -

Prioritise the alignment of targeted and planned population and employment growth with investment in the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built-up areas that meet the diverse needs of local populations.

National Policy Objective 32 -

To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 -

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

National Policy Objective 34 –

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

National Policy Objective 74 -

Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.

We submit that the proposal for a high-density residential development at this highly accessible location is consistent with the National Planning Framework for 2040.

8.3 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

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

The plan outlines that “Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”

The plan repeatedly states the need for housing to be in appropriate locations, “In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as

education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 138 new residential units at a key location adjacent to services and amenities. The site has the benefit of accessibility to public transport services and is considered a significant opportunity site for the delivery of residential units. The proposal also supports Pillar 2 and will provide for 14 no. Part V units.

We submit that the proposal is consistent with the Action Plan for Housing and Homelessness.

8.4 Housing For All – A New Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will “Introduce the Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.”

In addition to this, the new fund will focus on “activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.” The fund will “stimulate activation of existing planning permissions for **build-to-sell**

apartment developments of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.”

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: “Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.”

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: “Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.”

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will “Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.”

The subject proposal provides 138 no. new residential units which will contribute towards the government’s target deliverance of 33,000 new residential units per year between 2021 and 2030.

We submit that the proposal is consistent with Housing for All – A New Housing plan for Ireland.

8.5 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly* (RSES) was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area.

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

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

“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.”

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities.

In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: 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.”

We submit that the proposal complies with the RSES as it will deliver the appropriate residential density of 186 units per ha having regards to the ‘2009 Sustainable Residential Development in Urban Areas’, ‘2022 Sustainable Urban Housing – Design Standards for New Apartments’ and ‘2018 Urban Development and Building Heights Guidelines for Planning Authorities’. The proposal site is ideally placed to provide the consolidation of Dublin city and suburbs with adequate supporting infrastructure to support the intensification of this brownfield site.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 204 units per ha and has had regard specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2022)’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities (2018)’ in ascertaining an appropriate residential density, height, and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The proposal utilises a prime suburban site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built up area of Dublin.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

8.6 Smarter Travel - A New Transport Policy for Ireland 2009-2020



The Government has committed in ‘Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020’ to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key goals of the Guidelines are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services.
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%.
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

Achieving sustainable transport will require a suite of actions that will have complementary impacts in terms of travel demand and emissions. These are as follows:

- Actions to reduce the distance travelled by private car and encourage smarter travel.
- Actions aimed at ensuring that alternatives to the car are more widely available.
- Actions aimed at improving the fuel efficiency of motorised transport.
- Actions aimed at strengthening institutional arrangements to deliver the targets.

Smarter Travel acknowledges that good progress is being made in meeting the above targets and actions by providing better guidance on planning and development through the delivery of Planning Guidelines.

A Traffic & Transportation Assessment Report prepared by AECOM is submitted as part of this planning application documentation which ensures that, in-so-far-as-possible, the impacts of traffic are reduced and minimised where practical.

We submit that the proposal for a residential development at this highly accessible location is supportive of the objectives of Smarter Travel - A New Transport Policy for Ireland (2009-2020).

8.7 Transport Strategy for the Greater Dublin Area 2016-2035



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



The Strategy includes five overarching objectives to achieve the vision, which are as follows:

- Build and strengthen communities
- Improve economic competitiveness
- Improve the built environment
- Respect and sustain the natural environment
- Reduce personal stress

The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

The Strategic Infrastructure proposals are presented by mode of transport and relate to heavy rail infrastructure, light rail infrastructure, bus infrastructure, cycling infrastructure, walking and road network. We wish to highlight that the current proposal for residential development moves away from car provision for each resident of the development. This can be achieved as a direct result of the proximity of high-quality public transport, pedestrian and cycle connections, employment centres and local services and facilities.

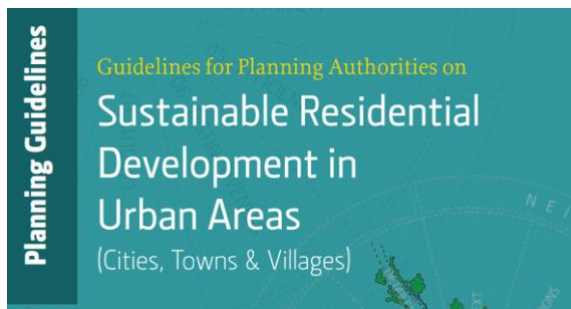
We submit that the proposal for a high-density residential development at this highly accessible location is supportive of the objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.



9 Statement of Consistency - Section 28 Ministerial Guidelines

Each of the relevant strategic policy documents are now considered below and their relevance to the subject site and the developments compliance with same, is assessed in detail.

9.1 Sustainable Residential Development in Urban Areas (2009) Guidelines



The role of these guidelines is to ensure the sustainable delivery of new development throughout the country. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. High quality design is recommended in the development management process. The Guidelines are accompanied by an Urban Design Manual, which demonstrates how key principles can be applied in the design and layout of new residential development.

Chapter 5 of this document focuses on Cities and Larger Towns. It is our view that Glenageary falls under the category of larger town within the Guidelines.

We examine the contents of the Guidelines as they relate to Larger Towns:

Design

The key elements of design in the context of larger towns are as follows:

- Acceptable Building Heights
- Avoidance of Overlooking/Overshadowing
- Provision of adequate public and private open space
- Internal Space in Apartments
- Suitable parking provision
- Provision of ancillary facilities

The current proposal has been designed in the context of the above and we note the following in this regard:

- Appropriate building heights are proposed in accordance with the performance criteria under the Building Heights Guidelines 2018. Section 7.2 of this report refers and contains the specifics of heights proposed.
- The potential for overlooking has been reduced through the considered positioning of residential blocks, appropriate separation distances, appropriate setback distances and the strategic positioning and design of windows and balconies.
- Overshadowing is not considered an issue in this case, and we note the submission of a Preliminary Shadow Assessment.
- An adequate level parking is delivered with primary parking delivered at basement level. All parking is proximate to units and is considered safe and secure.
- Pedestrian access and permeability are key across the site and specific attention has been given to accessibility and the connectivity of the site with surrounding streets
- A creche and residential amenity facilities are delivered within the scheme.

Density

A density of 186 units per ha is proposed at this site. It is submitted that this is an appropriate approach to development at this location given the surrounding site context. The site is considered an 'intermediate

urban location’ and the Guidelines refer to there being no upper limit on density subject to the following safeguards:

- **Compliance with the policies and standards of public and private open space adopted by development plans;**

The proposed public and private open space provision complies with the Dún Laoghaire-Rathdown County Development Plan 2022-2028, and where relevant the Apartment Guidelines 2022.

- **Avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours;**

The proposed scheme design is supported in terms of access to daylight and sunlight with no significant impacts within the development or to adjoining dwellings. We refer the Planning Authority to the Daylight and Sunlight Assessment prepared by 3D Design Bureau accompanying this report.

- **Good internal space standards of development;**

The proposed development complies with the minimum standards required for internal floor areas set out in the 2022 Apartment Guidelines.

- **Conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relating to height or massing;**

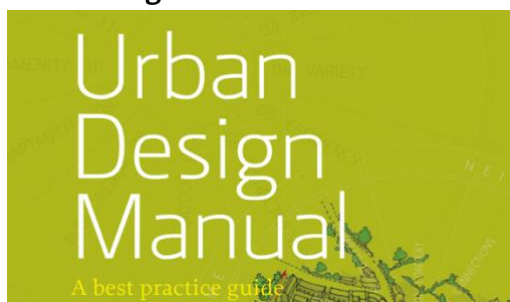
This report sets out how the development now proposed conforms with the Building Height Strategy (Appendix 5) of the Dún Laoghaire-Rathdown County Development Plan 2022-2028. Where relevant, consideration is given to the guidance of the Building Height Guidelines 2018. We refer the Planning Authority to Section 9.6 of this Report and to the Building Height Strategy Section of the Architects Design Presentation prepared by John Fleming Architects.

- **Recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character or appearance of an Architectural Conservation Area; and**

The subject site is not within an Architectural Conservation Area and there are no Protected Structures on site. The design proposed strikes a balance between consistency with surrounding character while creating a distinct scheme.

The proposed development is located on suitably zoned land for residential purposes. The density requirement set out by the current County Development Plan and national guidance have been complied with when designing the scheme. The site layout maximises permeability through appropriate block sizes, block heights, and connectivity. Careful consideration has been given to adjoining levels of residential amenity.

9.2 Urban Design Manual



Aside from the above, we draw attention to the compliance of the scheme with the ‘sister’ document for these guidelines, the ‘Urban Design Manual’. This pre-planning submission is accompanied by a Design

Statement, prepared by John Fleming Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design.

The Design Statement should be read in conjunction with this Planning Report and with the plans and particulars accompanying this pre-planning submission.

For the purposes of this report, compliance with the key requirements of the Urban Design Manual are noted below:

CRITERIA	RESPONSE
CONTEXT How does the development respond to its surroundings?	<p>The proposal seeks to provide a development that is self-sufficient in terms of privacy, access to open space, and parking. Appropriate access points are provided to the development – both pedestrian and vehicular.</p> <p>The site maximises connections to the wider area via cycling and pedestrian paths and linkages to public transport connections particularly through the provision of 2 no. new / upgraded pedestrian crossings at Glenageary Avenue.</p> <p>The height, scale and massing proposed is considered appropriate to the characteristics of the existing topography and surroundings of the site. The site occupies a strategic position in urban design terms with the potential to create a focal point at the Junction of Sallynoggin Road and Glenageary Avenue and will provide major public realm improvements.</p>
CONNECTIONS How well is the new neighbourhood/site connected?	<p>The proposal delivers on the following in terms of connections:</p> <ul style="list-style-type: none"> ○ Appropriate access points are provided to the development and the site is designed to be permeable, encouraging people to walk and cycle as all areas can be accessed via the new plaza which is placed on the current desire line between the existing local neighbourhood centre and the proposed development. ○ A new public plaza makes a positive contribution to the Neighbourhood Centre. ○ The site's proximity to Dun Laoghaire Town Centre and public transport links (bus and DART) ensures a safe and easy access from the site to amenities, facilities and services in the area.
INCLUSIVITY How easily can people use and access the development?	<p>As the proposed developments occupies a corner site, footpaths are provided along all street edges. We note the following in terms of useability and access to and within the scheme:</p> <ul style="list-style-type: none"> ○ Pedestrian access and linkages to the site are in existence and with distances to nearby public transport and amenities are convenient and set out above. ○ The proposed development will provide a range of accommodation types. ○ All residential units are designed to be fully accessible and the scheme is fully compliant with Part M of the <i>Building Regulations</i>.
VARIETY How does the development promote a good mix of activities?	<ul style="list-style-type: none"> ○ Variety in the development is provided through a range of design proposals in both the built environment and in the landscaping layout. ○ In the built environment, there are a different unit typology which allows for accommodation for a variety of users. ○ A variety of materials of complementing colours are proposed for the external finishes of the development. ○ The landscaped elements are divided between several areas throughout the site which gives residents a variety of open space areas to avail of. ○ Passive security is designed to provide total surveillance. ○ Variety of commercial activities are also proposed at ground floor level to include restaurants, cafes, number of small retail spaces. A large childcare facility is also proposed within the scheme to cater for approx. 47 no. childcare spaces and will include a dedicated outdoor play area. ○ Resident amenity spaces are also proposed to include resident support services, concierge services, co-working spaces, social spaces and gym. ○ A variety of open spaces are also proposed to include public open space in the form of a public plaza accommodating outdoor seating, planting, pedestrian and cycle links and communal open space which includes a roof terrace proposed at the link of Block A and Block B and a roof terrace at the fifth floor level of Block B.



<p>EFFICIENCY How does the development make appropriate use of resources including land?</p>	<p>The scheme proposed strives to maximise the use of the site whilst providing an appropriate scale, massing and unit mix on site.</p> <p>The density proposed (186 units/ha) is supported by the connectivity to existing high capacity and frequency bus routes and proximity to the adjacent, well-established commercial and residential uses.</p> <p>The site is defined as suburban infill in the context of the Sustainable Residential Development in Urban Areas Guidelines. High density is justified in this instance given the site's proximity to public transport and sustainable access (walking and cycling) to areas of employment. Private and public open space is provided in excess of required standards. Roof space is utilized for open space and increased biodiversity. The proposed development represents the efficient use of land.</p>
<p>DISTINCTIVENESS How do the proposals create a sense of place?</p>	<p>The proposed scheme will result in the creation of a landmark building at Glenageary Roundabout. The notable lack of existing surrounding development affords the opportunity to establish precedent for high-quality, high-density development in a suburban metropolitan area well served by public transport and proximate to areas of employment concentration. Active Street frontages are provided along street edges in addition to a focal point at street level which consists of the convergence of pedestrian routes through the subject site to a public transport node.</p> <p>The scheme promotes the principles of DMURS - Design Manual for Urban Roads and Streets. This balance of road planning, public space and site layout will provide an inviting and enticing setting for a new community.</p> <p>The proposal features landscaping unique to the subject site which will create an immersive open space area for residents synonymous with the proposed development.</p> <p>A distinctive sense of place will be created by the provision of extensive public realm improvements that will encourage social integration through the creation of an internal street/Plaza which will help promote a local sense of community. The proposed development will be a strong presence in the neighbourhood and will ensure a sensitive approach and transition in scale.</p>
<p>LAYOUT How does the proposal create people-friendly streets and spaces?</p>	<p>As can be seen from the layout, pedestrian priority is maintained within the scheme and adjoining it with new connections is also proposed. The scheme design facilitates the car through a pedestrian dominant environment with minimal potential for vehicular pedestrian conflict. The scheme is DMURS compliant and a Traffic Impact Assessment and Road Safety Audit have been prepared and accompany the submission.</p> <p>There are many opportunities for people to gather and meet in a variety of communal amenity areas and public open space areas.</p>
<p>PUBLIC REALM How safe, secure and enjoyable are the public areas?</p>	<p>The public and communal spaces within the scheme are easily accessible from all units and avoid physical and visual barriers. The layout of communal open space areas has been arranged to ensure that these spaces are safe secure and well maintained. The spaces will have the benefit of passive surveillance from apartments.</p>
<p>ADAPTABILITY How will the buildings cope with change?</p>	<p>All apartments as proposed are adaptable and considered appropriate for cross-generational use. The development offers a range of unit types and sizes for people at every stage of life. As a family grows, they could move within the development to another unit that better suited their needs without having to relocate a long distance away.</p> <p>The internal areas for the majority of the units exceed current design standards allowing capacity for adaptation in the future. All of the units have been fully assessed to ensure compliance with Part M. These provisions allow for future adaption of the units to increase accessibility in the future.</p>
<p>PRIVACY AND AMENITY</p>	<ul style="list-style-type: none"> ○ Appropriate set back distances are maintained. ○ Landscaped buffer zones are provided to all apartment units at ground floor level.



How do the buildings provide a high quality amenity?	<ul style="list-style-type: none"> Private open space is in line with all required development standards. 3D Design Bureau have ensured that good quality daylight and sunlight is provided to all apartment units and open spaces. In addition through 3D modelling they have ensured that the massing of the proposed development does not negatively impacts on the daylight and sunlight provision within the development or to the adjacent dwellings.
PARKING How will parking be secure and attractive?	<ul style="list-style-type: none"> Residents parking is securely placed in the basement along with bicycle parking which will be securely locked. Set down and accessible parking is provided at surface level on the perimeter of the site. A mix of secure and covered visitor bicycle parking spaces are provided for all apartments located close to entrances and spread evenly around the landscaped plaza.
DETAILED DESIGN How well thought through is the building and landscape design?	Parkhood Landscape Architects worked closely with John Fleming Architects to devise a scheme that complements and respects the original design concept. The landscaping proposal enhances the development and ensures that the individual amenity of the units and wider residential amenity of the scheme is of high quality. Comprehensive landscaping proposals are included for the proposed development including a range of facilities for children of different ages, parents and the elderly. The landscape proposal greatly enhances tree and shrub planting on site with pockets of planted communal and public open spaces dispersed throughout the development, creating an improved sylvan residential setting. The public and communal spaces over seating areas as inspired by the area outside Peoples Park, Dún Laoghaire.

Table 3 - Compliance with Urban Design Manual

The above table clearly outlines how the development proposal is envisaged to deliver on the key provisions of the Urban Design Manual.

We submit that the current proposal is supportive of the objectives of the Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual.

9.3

Draft Sustainable and Compact Settlements Guidelines

Sustainable and Compact Settlements Guidelines for Planning Authorities

Draft for Consultation August 2023

The Draft Sustainable and Compact Settlements Guidelines were published on 31st August 2023. It is expected that these Guideline will be adopted in final form in October 2023 and will supersede Guidelines for Sustainable Residential Development in Urban Areas (2009).

The Draft Guidelines expand on the higher-level policies of the NPF in relation to the creation of settlements that are compact, attractive, liveable and well-designed. There is a focus on the renewal of settlements on the interaction between residential density, housing standards and placemaking to support the sustainable and compact growth of settlements.

Section 3.2.2 of the *Draft Guidelines* reviews what are termed ‘settlements, area types and density ranges’ for various site locations. Table 3.1 of the *Draft Guidelines* outlines density ranges for Dublin. The ranges are broken down into ‘City Centre’; ‘City Urban Neighbourhoods’; ‘City Suburban/Urban Extension’; ‘Metropolitan Town’; and ‘Metropolitan Village’. In terms of categorisation, it would be our opinion that the site at Glenageary Gate would fall under the definition of ‘City Urban Neighbourhood’, which is defined in the Guidelines as follows:

“The city urban neighbourhoods category includes:

- i. the compact medium density residential neighbourhoods around the city centre that have evolved over time to include a greater range of land uses;
- ii. town centres designated in development plans, and
- iii. lands around an existing or planned high capacity public transport node or interchange (defined in Table 3.7) – 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 (including designated town centres and lands around existing or planned public high capacity transport nodes and interchanges) in the city and suburb areas of Dublin.”

The site’s immediate surroundings includes a mixture of commercial, light industrial, employment and residential land uses that have evolved over time. The area contains a significant amount of services, facilities, amenities and a wide range of uses in the immediate surrounding area including several schools and childcare facilities within the vicinity, leisure facilities, local shops, public transport stops only a short walk away. Immediately adjacent the site exists low density residential housing however, the surrounding area has evolved more recently to include higher density developments that of Honeypark and Cualanor within 500 m of the subject site.

The subject site is located in close proximity to high-frequency public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area.

There are two bus stops located at the subject site’s boundary. The bus stop on Sallynoggin Road (Stop 3205) is serviced by route no.:

- 7A (Mountjoy Square – Loughlinstown Park)
- 7D (Mountjoy Square – Castle Street)
- 45A (Dún Laoghaire – Kilmacanogue)
- 45B (Dún Laoghaire – Kilmacanogue)
- 111 (Dalkey – Brides Glen)

The bus stop located on Glenageary Avenue (Stop 7646) is serviced by route no. 7 (Mountjoy Square – Brides Glen Bus Stop). The site is also in close proximity to the BusConnects Quality Bus/Bus Priority Routes L22 (Dún Laoghaire – Brides Glen), L11 (Dún Laoghaire - Kilmacanogue), 98 (Mountjoy Square via City Centre – Loughlinstown Park), P12 (Dalkey – Townsend Street)

The site is located c. 1.2km (16-minute walking distance) from the Glenageary DART Station. Dun Laoghaire DART Station is located c. 2km (26-minute walking distance) from the site.

All of the above considered, it is our view that the site can be classed to be as a ‘City Urban Neighbourhood’ and a density range of 50 dph to 250 dph (net) applies.

The current proposal is therefore in compliance with the Draft Sustainable and Compact Settlements Guidelines with a proposed density of 186 dph.

9.4 Guidelines for Planning Authorities on Childcare Facilities (2001)

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: “Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The

lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities.”

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Child Care (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and
- Intended hours of operation.

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces.

Based on the mix proposed, we note the following requirements for childcare:

- 50% of 2 and 3-bedroom units will require childcare provision. We have identified that there is a total of 101 no. 2 and 3-bedroom units proposed which equates to 51 no. units having the potential to require childcare.
- 1 facility is required for every 75 units requiring childcare.

While the subject proposal does not warrant the requirement to propose a childcare facility on site since 51 no. units would have the potential to require childcare. Nonetheless, a childcare facility with a capacity of 47 no. children will be provided as part of the subject proposal to cater for the likely demand arising from this development.

The current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Apartment Guidelines of 2018.

9.5 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

We refer to the enclosed Flood Risk Assessment prepared AECOM for full details on the assessment carried out in line with the above guidelines. The key conclusions of this document are as follows:

“The subject site has been analysed for risks from tidal and fluvial flooding, pluvial flooding, groundwater, and drainage system failures due to human error or mechanical system failure. Available future scenario models including climate change allowances, do not predict an increase in flood extent onto the site i.e. the site remains in Flood Zone C which is most preferable for residential developments.”

9.6 Guidance on Appropriate Assessment for Planning Authorities (2009)

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

We confirm that an AA Screening Report and Ecological Impact Assessment, prepared by Openfield, forms part of this LRD application.

9.7 Sustainable Urban Housing: Design Standards for New Apartments 2022



‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022’ are intended to 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 2022 Apartment Guidelines replace the 2020 which replaced the 2018 version to reflect the conclusions from the review of co-living and shared accommodation. These current guidelines are a further technical update in relation to ‘Build-to-Rent’ accommodation and to update other references, where necessary.

The Design Standards for new Apartment’s detail 3 no. locations where apartment developments are generally suitable. These are defined as:

1. ‘Central and / or Accessible Urban Locations
2. Intermediate Urban Locations
3. Peripheral and / or Less Accessible Urban Locations.’

The first urban typology described in the Guidelines is that of Central and/or Accessible Urban Locations, and while the proposed development does fall into this category in terms of walking distance to public transports the second typology is more apposite to the site given the location of the proposed development, over 10km from Dublin City Centre, the services and facilities in the area. The development is classed as being in an ‘Intermediate Urban Location’ within the guidelines which are defined as the following in section 2.4:

“Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwelling per hectare net), including:

- Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e. between 10-15 minutes or 1,000- 1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.”

We submit that the apartment element of this development is appropriate at this location given its location within 1,200 m from Glenageary DART Station and the immediate proximity to high and reasonably frequent bus services.

9.7.1 Specific Planning Policy Requirements

The current proposal provides for 147 no. residential units and this statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1

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).

Applicant Response to SPPR1

The proposed mix for apartments within this development is as follows:

- 37 no. 1 bed units (27%)
- 68 no. 2 bed units (49%)
- 6 no. 2 bed, 3-person units (4%)
- 27 no. 3 bed units (20%)

We submit the proposal is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units. In addition, the proposed unit mix is fully compliant with the Dun Laoghaire-Rathdown County Development Plan 2022-2028 which has been informed by an evidence-based Housing Need and Demand Assessment.

Specific Planning Policy Requirement 2

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- ***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;***
- ***Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;***
- ***For schemes of 50 or more units, SPPR 1 shall apply to the entire development;***



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.

Applicant Response to SPPR2

We note that the subject site area exceeds 0.25ha. SPPR 2 does not apply in this instance.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- 1-bedroom apartment (2 persons) 45 sqm
- 2-bedroom apartment (3 persons) 63 sqm
- 2-bedroom apartment (4 persons) 73 sqm
- 3-bedroom apartment (5 persons) 90 sqm

Applicant Response to SPPR3

The proposed development complies with the minimum apartment floor areas as follows:

- 1-bedroom apartment (2 persons) – 47.6 sqm – 55.3 sqm
- 2-bedroom apartment (3 persons) – 67.2 sqm
- 2-bedroom apartment (4 persons) – 74.5 sqm – 83.5 sqm
- 3-bedroom apartment (5 persons) – 90.8 – 93.7 sqm

For further information in this regard, please refer to the enclosed architectural drawings and ‘Housing Quality Assessment’ schedule prepared by John Fleming Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement 4

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

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

Applicant Response to SPPR4

The development in this instance is located in a suburban location on appropriately zoned lands in a highly accessible location within the Glenageary area. The proposed development delivers 49% dual aspect units. We note specifically that a total of 67 of the 138 no. units proposed deliver dual aspect.

Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines.

Specific Planning Policy Requirements 5

“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.”

Applicant Response to SPPR5

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 3.5m.

We note the Guidelines state the following:

*“Building Regulations Technical Document F deals with Ventilation. It provides guidance on ceiling height in habitable rooms. The suggested minimum floor to ceiling height, consistent with good room design, the use of standard materials and good building practice is **generally 2.4m**”*

Given this, the proposed development complies with the floor to ceiling height requirements of the Apartment Guidelines.

Specific Planning Policy Requirements 6

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”

Applicant Response to SPPR6

SPPR 8 (v) is the predominant policy on the number of apartments per core. However, we can confirm that the number of apartments per floor per core will not exceed 12 no. in any block. To this end, it is noted that that the maximum number of units per floor core proposed in this development is 12 no. units per floor core.

In addition to the Specific Planning Policy Requirements noted above the ‘Guidelines’ sets out additional requirement for the following items:

Internal Storage

Unit Type	Min. Storage Requirements	Proposed
1-bed	3 sqm	4.4 sqm – 5.8 sqm
2-bed (3 person)	5 sqm	6.3 sqm
2-bed (4 persons)	6 sqm	6.1 sqm – 8.3 sqm
3-bed	9 sqm	9 sqm – 9.4 sqm

Table 4 - Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in excess of the minimum, as shown in the Housing Quality Assessment prepared by John Fleming Architects.

Unit Type	Min. Private Open Space Req.	Proposed
1-bed	5 sqm	5.2 sqm – 16.4 sqm
2-bed (3 person)	6 sqm	6 sqm
2-bed (4 persons)	7 sqm	7 sqm – 13.9 sqm
3-bed	9 sqm	9 - 9.1 sqm

Table 5 - Private Amenity Space Requirement and Provision



We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward.

All balconies will meet or exceed the minimum depth requirement of 1.5 m.

Communal Amenity Space

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	37 x 5 = 185 sqm
2-bed (3 person)	6 sqm	6 x 6 = 36 sqm
2-bed (4 persons)	7 sqm	68 x 7 = 476 sqm
3-bed	9 sqm	27 x 9 = 243 sqm
Total		940 sqm

Table 6 - Communal Amenity Space Requirement and Provision

The current proposal exceeds the requirements and provides for a total of 958.2 sqm of communal amenity space which includes the roof terrace at the link of Block A and Block B and roof terrace at fifth floor level of Block B.

Childcare Facilities

The Apartment Guidelines require the provision of one childcare facility for every 75 dwelling units, subject to the proposed development mix and existing local childcare facilities.

It is also stated that “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.”

In addition to this it clarifies that “**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.**”

The proposed development of 138 units provides for the following unit mix:

- 37 no. 1 bed units
- 74 no. 2 bed units
- 27 no. 3 bed units

Guidance on the provision of a childcare facility suggests that 1 facility (20 spaces) is required for every 75 units. It is evident from a review of planning policy that one bedroomed units are not considered to contribute to childcare demand under the Apartment Guidelines (2022). **Therefore, a total of 101 no. units have the potential to require childcare.**

The Childcare Guidelines (2001) have identified that only 50% of units will require childcare. The following requirements are therefore identified:

- 50% of 101 no. units = 51 units

Under the 2001 Childcare Guidelines, minimum floor space requirements per child is 5sqm. This is exclusive of kitchen, bathroom and hall, furniture or permanent fixtures.

The proposal will provide for a childcare facility (GFA approx. 263 sqm) in a standalone building, accessible to all within the development and external users if necessary. This childcare facility is anticipated to have capacity for 47 no. childcare spaces.



We therefore submit the proposed development is acceptable in addressing the anticipated demand that might arise from the proposed development.

We submit to the Board that the proposal is consistent with the overall principles of the Sustainable Urban Housing: Design Standards for New Apartments (2022)

9.6 Urban Development and Building Height Guidelines (2018)

Urban Development and Building Heights

Guidelines for Planning Authorities

December 2018



The publication of the ‘**Urban Development and Building Heights, Guidelines for Planning Authorities (2018)**’ is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.*

The Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

“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.”

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

“It is a specific planning policy requirement that where:

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority that the proposed development satisfies criteria. The relevant criteria, followed by an applicant response is set out below to clearly set out for the Planning Authority to demonstrate that the current proposal respects the outlined Development Management Criteria.

Table 9-1 Development Management Criteria

At the scale of the relevant city / town	
Assessment Criteria	Response
<i>“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i>	The site is well served by public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area (bus routes No. 7a,7d, 45a, 45b, 46a and 111). The site is also located c. 1.2km (16-minute walking distance) from the Glenageary DART Station. Dun Laoghaire DART Station is located c. 2km (26-minute walking distance) from the site.
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, 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.	The proposal is not located within an architecturally sensitive area. However, careful consideration has been given to the successful integration of the scheme into the existing character and topography of the site and area. The proposal would result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality due to both the low sensitivity, quality and nature of the existing site and the proposed revitalisation and new architectural character.
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.”	The proposed development would not reduce the visual amenity of the surrounding area. Careful consideration has been given to the existing surrounding area and appropriate set back distances have been maintained to not reduce the level of amenity experienced by surrounding buildings. A variety of unit types and heights are provided across the development site offering a variety in scale and form while also providing an appropriate density for the site given its location and scale.
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to the natural and built environment in an appropriate manner. Careful consideration has been given to the proposal regarding how it addresses the surrounding area with particular attention given to the streetscape

	and similar surrounding development. The high-quality design submitted provides an appropriate development which will provide a precedent for development on nearby similar sites. The development aims to deliver a new high quality residential development catering to the demand for new units as outlined in national policy documents on a currently underutilised site.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that a monolithic appearance is avoided. Different materials, and fenestration as well as changes in massing across the site will break up the uniform appearance of the site and create visual interest. The changes in height from 4 to 7 storeys on the site creates a unique townscape, avoiding the feel of a monolithic one-dimensional development.
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).	There is no inland waterways or marine frontages within the current proposal. We can confirm that initial investigations have concluded that there will be no inappropriate flood risk because of the proposal. We refer the Planning Authority to the Flood Risk Assessment report prepared by AECOM.
The proposal 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.	The high-quality design proposed will ensure that the development will be legible and attractive when viewed from the wider area. Internally, the site provides pedestrian and cyclist linkages which integrates the development.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”	The appropriate mix of unit types and sizes will be incorporated into the proposed development to contribute to a currently limited market for this type of housing. The mix of 1, 2- and 3-bedroom apartments provides variety and options within a single development for future residents.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	The design of the subject scheme, particularly the orientation of the residential units was carefully considered to minimise the potential for overlooking and overshadowing of each other.
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’. Where a proposal may not be able to fully meet all the requirements of the daylight provisions	We confirm that a Daylight and Sunlight Assessment has been completed by 3D Design Bureau and accompanies this report. We do note that compensatory measures have been incorporated into the design of the proposed development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. The full compensatory

<p>above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	<p>measures per each room is detailed in 3D Design Bureau's report however some of the measures incorporated are listed below for the convenience of the Planning Authority:</p> <ul style="list-style-type: none"> • Some of the units are facing the landscaped communal open space • Some of the units are facing the public plaza / public realm • Some of the units are 10% larger than the minimum and have views to public plaza / communal open space. • Some of the units are dual aspect with views to public / communal open spaces.
Site Specific Assessment	
<p>Specific impact assessment of the micro-climatic effects such as down-draft. 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>A full analysis of the microclimate has been prepared by AWN Consulting and is lodged as an accompanying document of this planning application.</p> <p>The analysis concluded that the <i>“proposed development would have no significant effects with regard to microclimate, either in the vicinity of the development or within the development or on balcony areas.”</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>As detailed in both the Screening Report for Appropriate Assessment and the Ecological Impact Statement prepared by Openfield, the subject site was assessed for roosting and foraging bats and birds with no evidence of either animal encountered during survey. The potential of the habitats for foraging bats is low due to the highly built-up nature of the surrounding lands with no semi-natural connectivity and high levels of artificial light.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links</p>	<p>As the subject buildings are not considered to be of significant height this assessment is not required in this instance.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>	<p>Given the development is removed from any airports or air strips this report is not required.</p>
<p>An urban design statement including, as appropriate, impact on the historic built environment</p>	<p>There are no Protected Structures onsite, and the site is not located within an Architectural Conservation Area.</p> <p>The development proposes no potential impact on any nearby protected structures.</p>
<p>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</p>	<p>We confirm that an Appropriate Assessment Screening Report, an Ecological Impact Assessment prepared by Openfield and an Environmental Impact Screening Assessment</p>



	Report prepared by Verde accompany this LRD Application.
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In consideration of above, the current proposal for 138 no. apartment units can be positively considered on this site by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Guidelines that being one proximate to public transport and a variety of services.

We submit that the preliminary proposal is consistent with the Urban Development and Building Height Guideline for Planning Authorities (2018)



10 Statutory Planning Context

The Dun Laoghaire-Rathdown County Development Plan 2022-2028 is the relevant statutory planning context governing the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions or alterations made during the lifetime of the permission.

It is submitted that it is the design team's full intention for the subject scheme to be in compliance with the site zoning, key development objectives and key development standards.

The subject site is now put forward in accordance with this Development Plan policy context.

10.1 Core Strategy

The Core Strategy of this Plan aims to articulate a medium to longer term quantitatively based strategy for the spatial development of the County and in so doing to demonstrate that the Plan and its objectives are consistent with national and regional development objectives set out in the NPF and RSES.

The central focus of the Core Strategy *“is on residential development and in ensuring that there is acceptable equilibrium between the supply of zoned, serviced lands for the projected demand for new housing, over the lifetime of the plan.”*

10.2 Housing

Population and Housing Trends

DLR has experienced a significant reversal in population growth trends from a County that was experiencing a period of population stagnation through the noughties, to a County that has experienced consistent and strong population growth over the last 10 to 15 years. The 2016 Census records indicate that DLR has a population of c.218,000 people which comprises an increase of c. 24,000 people over the two intercensal periods from 2006 to 2016. The average annual population projections set out in the table below.

	2016	2026 (Low to High)	2028 (Low to High)	Total Population Growth 2016-2028	Average Annual Pop Growth 2016-2028
Dún Laoghaire-Rathdown	218,000	246,750 – 252,375 ¹	250,550 – 258,375 ²	32,550 – 40,375	2,713 – 3,365

Table 7 – DLR Core Strategy – Population Projections

There has been a significant increase in housing completion levels from that experienced during the financial and property crash with housing completion levels now averaging c. 1,200 units per annum. Looking at the most recent intercensal period between 2011 and 2016, population increased by 11,757 people while housing stock only increased by 1,066 units. This represents an enormous undersupply in housing units. Therefore, this subject proposal would provide an increase in 113 no. new housing units for the population of the County.

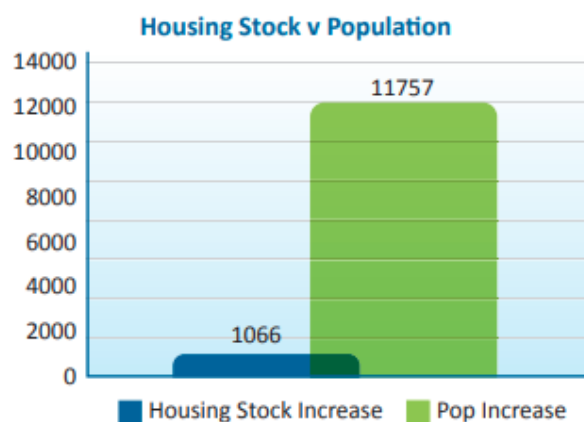


Figure 19 – Housing Delivery v Population Growth 2011-2016

The table below highlights the requirement of 20,669 no. additional residential units up to the year 2028.

	2016	2028 – RSES High Growth Scenario
Population	218,000	258,375
Increase in Population	N/A	40,375
Total Housing Stock	86,962	111,944
Housing Target (2016-2028)	N/A	24,982
Minus CSO Housing Completions (Q2 2016 – Q4 2019)	N/A	4,313
Housing Target (2020-2028)	N/A	20,669

Table 8 – Core Strategy Housing Target

Figure 20 below highlights the Housing Land Availability Study. The subject site is located in the area highlighted being Infill/Windfall lands with a capacity to provide for 4,571 units within the lifetime of the Plan.

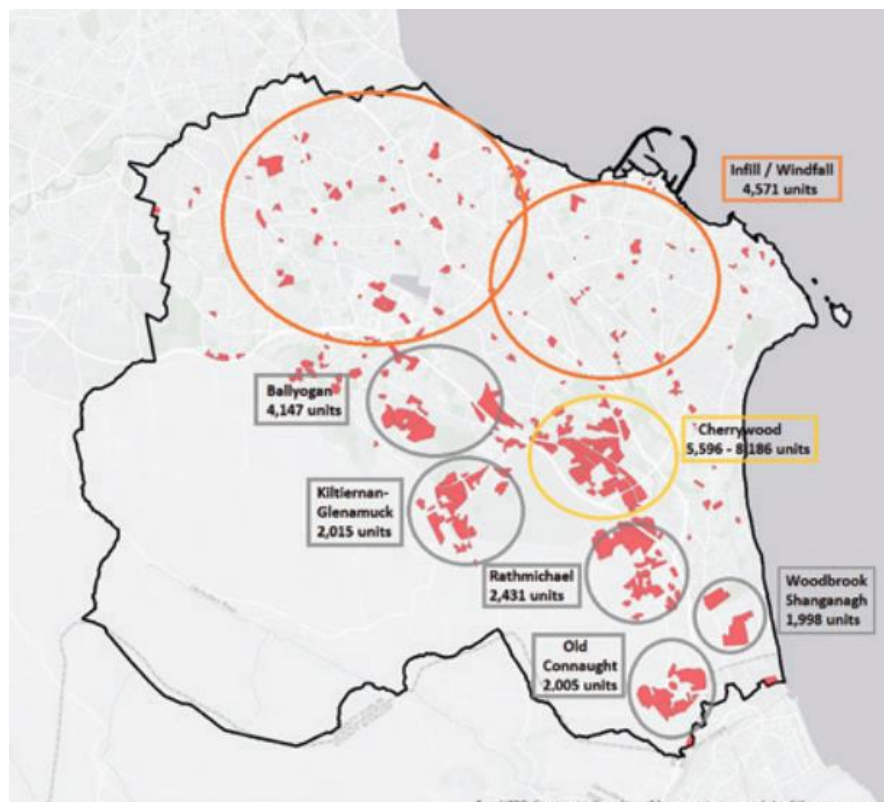


Figure 20 – Residential Development Capacity Audit – Aggregate Data

The subject proposal is consistent with the Core Strategy of the Development Plan by providing 138 no. new residential units on serviced lands in close proximity to an established urban area.

10.3 Zoning

The subject site is zoned ‘NC – Neighbourhood Centre’ with an objective ‘to protect, provide for and/or improve mixed-use neighbourhood centre facilities.’.



Figure 21 – DLR Development Plan 2022-2028 Zoning Map Extract with subject site outlined in Red

The uses permitted in principle under this zoning objective are:

*“Advertisements and Advertising Structures, Assisted Living Accommodation, Betting Office, Carpark, Community Facility, Craft Centre/Craft Shop, **Childcare Service**, Civic Use Cultural Use, Doctor/Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre / Healthcare Facility, Offices less than 300 sqm., **Open Space**, Public House, Public Services, **Residential**, Residential Institution, **Restaurant**, Service Garage, **Shop-Neighbourhood**, Sports Facility, **Tea Room/ Café**, Veterinary Surgery.”*

The principle of a mixed-use residential development is therefore considered acceptable under this zoning objective.

The site is also subject to Specific Local Objective SLO 65 – “to prepare a Local Area Plan for Sallynoggin”. We note that the referenced LAP has not yet been adopted or prepared and the Planning Authority does not yet have an expected timeframe for same.

The subject site is also adjacent to the ‘Cherrywood to Dun Laoghaire 6 Year Road Objective’, as indicated by a dashed black line on the zoning map above. AECOM Consulting Engineers have been in contact with the Transportation Planning Department, and it has been demonstrated that the proposed building structure footprint does not encroach on the indicative signalised junction layout created in May 2008 and we confirm that the subject development proposal does not hinder, or conflict with any future proposals for the public realm improvement works associated with this 6-Year Roads Objective.

We refer the Planning Authority to Drawing No. 60690914-ACM-00-00-SK-CE-10-0010 prepared by AECOM Consulting Engineers for further details in this regard. It is highlighted that the proposed building, in principle, is not considered to make the signalised junction layout unfeasible. Further details of the discussion and agreement with the Transportation Department is provided in the report, prepared by AECOM, which accompanies this submission.

We also refer the Planning Authority to drawing no. 60690914-ACM-00-00-SK-CE-10-0011 prepared by AECOM Consulting Engineers which presents possible minor amendments to the signalised junction layout which would allow to facilitate the provision of a loading bay on Glenageary Avenue for the use of the proposed development.

As stated above, it has been highlighted that the footprint of the proposed signalised junction layout that has been provided by DLRCC Transport Planning far exceeds the extents of the referenced 6-Year Roads Objective, as indicated within the current development plan zoning maps and as referenced in Section 5.7 of the Plan that variations and / or adjustments may be necessary as projects progress. Furthermore, the proposed signalised junction layout provided is dated May 2008 and as confirmed by the Department to be likely outdated and would require significant amendments to meet current design standards.

We can confirm that that the subject proposal does **‘not hinder, or conflict, with any future proposals for the public realm improvement works associated with this 6-Year Roads Objective’**.

10.4 Planning Policy

This section of the report reviews the compliance of the scheme with Development Plan policy as per the table set out below.

Policy Ref.	Policy	Applicant Response
CS11	<i>“It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES)”</i>	The proposed development is in line with this policy as it provides 138 no. new residential units within the Dublin City and Suburbs geographic boundary.
PHP6	<i>“It is a Policy Objective to:</i> <ul style="list-style-type: none"> <i>Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.</i> <i>Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.”</i> 	Community facilities will be provided in the form of a childcare facility. This facility is considered to be of a high quality and will be accessible to residents and to the wider community where appropriate.
PHP18	<i>“It is a Policy Objective to:</i> <ul style="list-style-type: none"> <i>Promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites.</i> <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”</i> 	<p>The subject proposal for 138 residential units, provides a residential density of 186 units per ha. This residential density is considered appropriate to the site given proximity of the site to public transport and established services and amenities.</p> <p>The site is considered to offer a unique opportunity to achieve greater building height and residential density and is considered to deliver on the very spirit and intent of the requirements of the national policy mandate for higher residential densities at key locations.</p> <p>The proposed residential development is in keeping with 'Sustainable Residential Development in Urban Areas', 'Urban Design Manual- A Best Practice Guide', 'Quality Housing for Sustainable Communities' and 'Irish Design Manual for Urban roads and streets.' This report and accompanying documentation on DMURs set out this compliance in further detail.</p>

PHP20	<i>“It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.”</i>	The proposed development will not have significant impacts on the residential amenity of adjacent existing development and will positively contribute to the surrounding area.
PHP29	<i>It is a Policy Objective to:</i> <ul style="list-style-type: none"> <i>Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.</i> <i>Support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.</i> <i>Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.</i> 	<p>We note that the proposal provides for apartments on a site which is located directly opposite from a Neighbourhood Centre at Glenageary Roundabout.</p> <p>The site is well served by public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area. The site is also located c. 1.2km (16-minute walking distance) from the Glenageary DART Station. Dun Laoghaire DART Station is located c. 2km (26-minute walking distance) from the site.</p> <p>It is therefore submitted that the proposal is appropriate for an ageing population.</p>
PHP30	<i>“It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’”</i>	<p>The proposed development is in line with the Housing Strategy as it provides 14 no. social housing units under Part V.</p> <p>The housing provided overall is energy efficient, good mix of good quality housing and is accessible for all. This has been demonstrated in the objective addressed below.</p>
PHP35	<i>“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”</i>	The proposed development is accessible universally. John Fleming Architects have included a detailed drawing no. GAV-JFA-ZZ-OO-DR-A-PA-2300 – Universal Access Map accompanied by a Universal Access Statement setting this out.
PHP36	<i>“It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.”</i>	The proposed development will contribute positively in enhancing the public realm by establishing a strong street frontage with a public plaza, associated ground floor commercial uses and landmark building. The proposed development will create a strong urban edge at Glenageary Roundabout while facilitating permeability and connectivity through the site.
PHP38	<i>“It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.”</i>	<p>The design team have sought to maximise security and safety within the proposed development as follows:</p> <ul style="list-style-type: none"> Ensuring that all public spaces within the development are overlooked by the surrounding buildings Providing high levels of glazing in the communal areas of the apartment blocks Providing high levels of lighting in all communal and parking areas

		<ul style="list-style-type: none"> Providing privacy strips where units from directly onto the communal amenity open space.
PHP39	<p>“It is a Policy Objective to:</p> <ul style="list-style-type: none"> Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).” 	<p>The design of the proposal is of high-quality and incorporates many elements which contribute to establishing its own context, including a pedestrian dominant internal environment, a public plaza, commercial activities and focal point at Glenageary Roundabout, communal roof terrace and quality landscaped urban spaces.</p>
PHP41	<p>“It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.”</p>	<p>A Design Statement has been prepared and submitted by John Fleming Architects detailing how the proposal responds to the design criteria of the 2009 Urban Design Manual is set out in this Statement and Section 9.1 of this Planning Report and Statement of Consistency.</p>
OSR4	<p>“It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents ‘Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities’, (2009), the accompanying ‘Urban Design Manual - A Best Practice Guide’, and the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2018).”</p>	<p>The public open space within this development is of exceptional quality, with accessible and functional open spaces scattered throughout the scheme.</p> <p>Total Public Open Space provision is identified as 1,848.8 sqm proposed in the form of a public plaza accommodating outdoor seating, planting, pedestrian and cyclist links.</p>
OSR13	<p>“It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people - are facilitated in the public parks and open spaces of Dún Laoghaire – Rathdown.”</p>	<p>Comprehensive landscaping proposals are included for the proposed development including a range of facilities for children of different ages, parents and the elderly.</p> <p>A vibrant and multi-functional communal open space is provided to the south of Block B which benefits from safety, free from cars and passive surveillance and can provide a space that offers small children’s play area, picnic areas and benches.</p> <p>A series of nature-based play spaces express a new direction in early learning environments and provide a range of diverse and flexible play spaces which lead to tactile experiences and nature play without ever prescribing the use of the areas.</p>
CA17	<p>“It is a Policy Objective to promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments</p>	<p>Tree planting throughout the scheme has been selected to blend the development in to its surrounding environs and create focal points within the development. A mix of specimen trees, multi-stemmed trees coupled with seasonal grasses, ornamental shrubs and pollinator friendly herbaceous planting.</p>

	<p><i>shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES)."</i></p>	<p>We refer the Planning Authority to drawing no. 7655-L-1600-SOFTSCAPE DETAILS prepared by Parkhood Landscape Architects for the detailed planting plan which illustrates the range, variety and diversity of selected planting for the proposed development. The softscape plan has been prepared in accordance with the All-Ireland Pollinator Plan 2021-2025 in order to create areas of ecological enhancement and biodiverse using vegetation that is visually appealing. Further detail on planting species / varieties and sizes is addressed by Parkhood Landscape Architects in the accompanying Landscape Design Booklet.</p>
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Table 9 - Development Plan Policy Compliance

10.5 Development Standards

10.5.1 Residential Mix & Size

PHP27 – Housing Mix

It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future regional HNDA.

In order to demonstrate compliance with PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications for 50+ residential units with lands located within the neighbourhood will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County.

The proposed provision of residential units, shall provide a good mix that reflects existing, and emerging household formation, housing demand patterns and trends identified locally and/or within the County.

Area	Threshold	Mix Studio/1/2 bed requirement (Apartments)	3+ Bed Requirement (Apartments)
Existing Built-up Area	Schemes of 50+ units	<ul style="list-style-type: none"> Up to 80% studio, 1 & 2-beds No more than 30% overall of studio and 1-beds No more than 20% overall of studios 	Minimum 20% 3+ beds

Table 10 – Residential Mix Standards

Applications received within residual built up areas shall include:

- 'Details of existing and permitted units within a 10-min walk of the proposed development.'

Applicant Response:

Following the review of the 2016 Census for the Small Area District where the proposed development is situated, which the Apartment Guidance document references, there are a number of findings, which demonstrate that there is an adequate supply of 3-bed+ family type units in the surrounding area and a requirement for 1- and 2- bed units within the surrounding area is evident.

The following assessment focuses on a 1 km (c. 10-12 minute walking distance) Study Area which encompasses 57 no. Small Area Population Statistics (SAPs) area.



Figure 22 – 1km radius from Subject Site in Red denoting Study Area in Yellow

The population of the encompassing SAPs, within a 1 km radius from the subject site, recorded 15,389 people in the 2016 Census data.

A review of the selected Study Area confirms that these communities and their surrounding areas have an age profile weighed largely towards a young adult / adult working population group (ages 20-64). The largest age cohort within the study area is 40-44 with a total of 1,072 persons within this age group.

This can be attributed to the area's close proximity to Dún Laoghaire Town Centre, various Business Parks and accessibility to Dublin City Centre, making it an ideal area for professionals to locate. The proposed development offers a mix of 1, 2 and 3-bed units and will provide appropriate housing stock for the demographics of the area.



Figure 23 – Age Profile of Study Area (Source: CSO, 2016)

The figure above demonstrates that the age cohort across all areas is heavily weighted towards the working age group 20-64.

It is also important to note that the age profile results contained in DLR’s HNDA showed that Dún Laoghaire-Rathdown County has a greater proportion of people over 65 years of age that in any other Dublin County jurisdiction, the EMRA region or in the State. This, as a result would lead to a greater demand for smaller units for ‘sizing down’ than in any other areas in the State and is also evidenced by larger, older housing stock.

The County also has the smallest proportion of children aged 0-4 years compared to all regions with the exception of Dublin City Council.

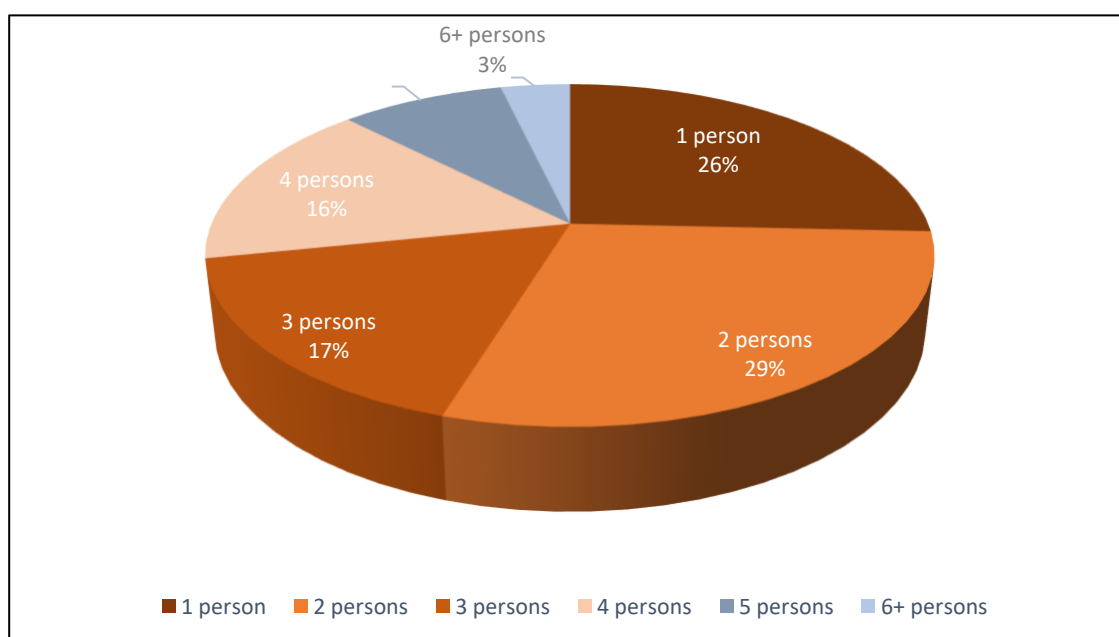


Figure 24 – Household Size of Study Area (Source: CSO, 2016)

The predominant household size in the 1 km radius from the subject site (Study Area) is 2 person households. This equates to 29% or 1,662 out of 5,725 households. Whilst we acknowledge the above figures show that roughly 55% of households in the Study Area there are 2 or less persons, we note that the average number of people per household in the Study Area is **2.68**. The breakdown of households by size in the Study Area reinforces the importance of providing suitable accommodation for smaller households, as they account for a large proportion of the overall households.

The proposed development offers an appropriate mix of units to accommodate, 1-5 person households (c. 97% of existing household formations in the Study Area) by providing the following:

- 37 x 1-bed (1- or 2-person household) units = 27%
- 6 x 2-bed (3-person household) units = 4%
- 68 x 2-bed (4-person household) units = 49%
- 27 x 3-bed (5-person household) units = 20%

The figure above demonstrates that 1-2 person private households made up a substantial number of households in the Study Area (55%) in 2016 and a similar proportion in Dún Laoghaire-Rathdown County (53%). This highlights the demand for suitable accommodation to cater to smaller households in this location.

From the above, it is submitted to the Planning Authority that the proposed unit mix and unit typology of the proposed development is entirely consistent with planning policy, demographic trends and established household formations to offer a much wider choice of units sizes, particularly smaller units for the 55% 1-2 person households in this area for which there is not appropriate offer of accommodation in the Study Area.

It is considered that the proposed development by providing an appropriate mix of 1-, 2- and 3-bedroom apartments in an area predominantly characterised by larger family size houses would indeed contribute to the variety of accommodation types and sizes in the country and the proposal is entirely consistent with planning policy, demographic trends and established household formations to offer a much wider choice of smaller units.

- ‘Detailed breakdown of proposed unit type and size including a percentage split between 1/2/3+ bed units.’

Applicant Response:

The proposed mix for apartments within this development proposal is as follows:

- 37 no. 1 bed units (27%)
- 68 no. 2 bed units (49%)
- 6 no. 2 bed, 3-person units (4%)
- 27 no. 3 bed units (20%)

The unit types offer a range of sizes and we note that more than 40% of apartments exceed the minimum floor area standard by a minimum of 10%. We refer the Planning Authority to the Housing Quality Assessment prepared by John Fleming Architects for further detail in this regard.

- ‘Site and/or floor plans that clearly identify that proposed units:
 - Are designed and located having regard to the needs of older people and/or persons with a disability
 - Are designed having regard the concept of lifetime adaptable and/or multigenerational homes’



Applicant Response:

All residential units are designed to be fully accessible and the scheme is fully compliant with Part M of the *Building Regulations*. These provisions allow for future adaption of the units to increase accessibility in the future. We refer the Planning Authority to the Floor Layout Plans and Universal Access Statement prepared by John Fleming Architects for further information in this regard.

- 'A statement outlining how the scheme has been designed for the needs of older people and/or persons with a disability and/or lifetime homes.'

Applicant Response:

All apartments proposed are adaptable and considered appropriate for cross-generational use. The development offers a range of unit types and sizes for people at every stage of life. As a family grows, they could move within the development to another unit that better suited their needs without having to relocate a long distance away.

The internal areas for the majority of the units exceed current design standards allowing capacity for adaptation in the future. As detailed above, all of the units have been fully assessed to ensure compliance with Part M and these provisions allow for future adaption of the units to increase accessibility in the future.

- 'No more than 10% of the total number of units in any private residential development may comprise of two-bedroom, three-person apartment types.'

Applicant Response:

The subject scheme proposes 6 no. 2-bedroom, 3-person units out of a total of 138 no. units proposed. This equates to 4% of the total no. of units.

10.5.2 Dual Aspect

The Development Plan sets out that there shall **generally** be a minimum of 50% dual aspect apartments in a single scheme.

Dual aspect provision stands at 49% and it is asserted that qualitative approach to the provision of dual and single aspect units, that prioritises the delivery of adequate daylight reception and ventilation, is required to maximise both the efficiency and residential amenity of new developments. The proposed development at the subject site meets all requisite standards under the Apartment Guideline's Design Standards and will undoubtedly provide a high level of quality and amenity for future residents with generous communal amenity space available to all residents.

In addition, we note that there are no single aspect north facing units and a high proportion of the single aspect units will have a sea view or view over the landscaped open space / public plaza. A number of the single aspect units are also proposed to have a projecting bay window offering a partial second aspect.

The short fall of 1% is not considered a material issue, and we invite the Planning Authority to consider the wider merits of the overall scheme.

10.5.3 Separation Between Blocks

It is stated in the Development Plan that all proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.

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

A separation distance of c. 22 m is maintained between the subject development and the residential dwellings to the north west of the site on Sallynoggin Road. A separation distance of 33.3 m is maintained



between the subject development and the opposing windows to the south of the site. A 25.8 m distance separates the existing Lidl and the subject development. The design of the scheme provides a setback of the building from the existing footpath and proposes a high quality interface with the public realm. The proposed ground floor development provides for an active street frontage and combined with the proposed landscaping elements is considered to provide a high quality environment and is not considered to adversely impact on the residential amenities of the dwellings in the surrounding area in terms of overbearing or overshadowing impacts.

A c.21 m separation distances is proposed between the blocks to preserve the residential amenities of the associated future residents and existing residential developments and, to ensure adequate circulation space at street level exists. We also refer the Planning Authority to the Sunlight and Daylight Assessment prepared by 3D Design Bureau for further information on the impacts of the subject scheme on neighbouring properties and an assessment of the sunlight and daylight access of the proposed residential apartments. .

10.5.4 Internal Storage and External Storage

Unit Type	Min. Storage Requirements	Proposed
1-bed	3 sqm	4.4 sqm – 5.8 sqm
2-bed (3 person)	5 sqm	6.3 sqm
2-bed (4 persons)	6 sqm	6.1 sqm – 8.3 sqm
3-bed	9 sqm	9 sqm – 9.4 sqm

Table 11 – Minimum Storage Space Requirements

It is noted that the scheme further complies with the requirements of the Development Plan as follows:

- Storage spaces are additional to kitchen presses and bedroom furniture.
- Hot press/boiler space does not count as general storage.
- No individual storage room exceeds 3.5 sqm.

The Development Plan also stipulates that apartment schemes should provide external storage for bulky items outside individual units in addition to minimum internal storage requirements. We refer the Planning Authority to the Ground Floor Plan prepared by John Fleming & Associates Architects which indicates the provision of storage lockers / communal storage area within the Residential Amenity Space at ground floor level of Blocks A and B.

10.5.5 Minimum Apartment Floor Areas

Unit Type	Min. Overall Floor Areas	Proposed
1-bed	45 sqm	47.6 sqm – 55.3 sqm
2-bed (3 person)	63 sqm	67.2 sqm
2-bed (4 persons)	73 sqm	74.5 sqm – 83.5 sqm
3-bed	90 sqm	90.8 sqm – 93.7 sqm

Table 12 – Minimum Overall Apartment Floor Area Requirements

10.5.6 Public Open Space

The Development Plan sets out a default minimum of 15% of the site area to be delivered as open space.

The public open space requirement for the subject site of 0.74 ha is 1,110 sqm. The subject proposal exceeds this requirement and provides a total of 1,848.4 sqm in the form of a public plaza which will make a positive contribution to the Neighbourhood Centre.

10.5.7 Communal Open Space

In addition to public open space, the Development Plan requires the provision of communal open space for apartments as follows:

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	37 x 5 = 185 sqm
2-bed (3 person)	6 sqm	6 x 6 = 36 sqm
2-bed (4 persons)	7 sqm	68 x 7 = 476 sqm
3-bed	9 sqm	27 x 9 = 243 sqm
Total		940 sqm

Table 13 – Communal Open Space Standards

The current proposal exceeds the requirements and provides for a total of 958.2 sqm of communal amenity space which includes the roof terrace at the link of Block A and Block B for the future residents.

The layout of the communal open space area has been arranged to ensure that these spaces are safe, secure and well maintained. The space will have the benefit of passive surveillance from apartments.

10.5.8 Private Open Space

The following areas of private open space areas are recommended in the Development Plan detailing minimum space standards for apartments:

Unit Type	Min. Private Open Space Req.	Proposed
1-bed	5 sqm	5.2 sqm – 16.4 sqm
2-bed (3 person)	6 sqm	6 sqm
2-bed (4 persons)	7 sqm	7 sqm – 13.9 sqm
3-bed	9 sqm	9-9.1 sqm

Table 14 – Private Open Space Requirement/Provision

10.5.9 Car Parking

Under the provisions of the Plan, the following car parking standards apply to apartments (depending on design and location):

The subject site is located in Parking Zone 3 and is characterised by:

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

The car parking standards for this zone and proposed provision are as follows:

Zone 3	Standard	Proposed
1-bed	1 space	Total of 80 no. car parking spaces proposed at basement level to include 3 no. accessible parking spaces and 17 no. EV charging spaces.
2-bed	1 space	
3- bed	2 spaces	
plus 1 in 10 visitor parking spaces		
Other		
Restaurant/Café/Bar/Lounge >100 sqm (GFA)	1 per 30	
Childcare (GFA)	1 per 40	
Retail > 100 sqm	1 per 30	
Retail < 100 sqm	1 per 30	

Table 15 – Car Parking Standard/Provision

In addition to the 80 no. proposed car parking spaces at basement level, a set down area/loading bay is proposed on surface level at Sallynoggin Road and a set down area/loading bay, 1 no. accessible car parking space and 2 no. visitor car parking spaces are proposed at surface level at Glenageary Avenue.

It is further noted that 2 no. designated car sharing spaces are proposed within the development. The benefits of such car sharing services include:

- The reduction of cars on the road and therefore traffic congestion, noise and air pollution;
- Frees up land traditionally used for private parking spaces;



- Encourages and potentially increases use of public transport, walking and cycling as the need for car ownership is reduced;
- Car sharing allows those who cannot afford a car the opportunity to drive, encouraging social inclusivity; and
- **Car share replaces approximately 15 private car parking spaces. [BMC Emphasis]**

Considering that 2 no. car sharing spaces are proposed that equates to 30 no. private car parking spaces increasing the provision from 80 no. spaces to 110 no. spaces. When the above standards are applied to the proposed development, a total of 157 spaces are required for the residential proposal. The proposal provides for 80 no. spaces including 3 no. accessible spaces and 2 no. GoCar sharing spaces, to cater for the residential development, which is acknowledged does not meet the standards set out in the Development Plan 2022-2028, but as per above, a deviation from the car parking standards may be considered by the Planning Authority as long as it complies with the assessment criteria 12.6 of the Development Plan. It is respectfully submitted that the level of car parking proposed is acceptable for the scheme given the sites public transport accessibility and proximity to services.

As outlined above, there are provisions for the relaxation of car parking requirements under the Guidelines for New Apartments. This proposal includes 80 no. car parking spaces including 2 no. designated GoCar parking spaces. It is important to note however that the car parking standards set out for apartments, are subject to ‘design and location’.

A deviation from the car parking standards can and should be considered by the Planning Authority subject to compliance with the assessment criteria of Section 12.4.5.2 (i) of the Development Plan discussed below in further detail.

We also note that the DOHPLG Apartment Guidelines (2022) provide for a reduced standard of car parking. Within this document, the following is stated:

“Central and/or Accessible Urban Locations:

*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision **to be minimised, substantially reduced or wholly eliminated in certain circumstances**. 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.*

*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 walking distance of high frequency (min 10 minute peak hour frequency) bus services.***”

Given the site’s proximity to high frequency public transport and walkability to local services, a relaxation of the car parking requirements for this site is considered appropriate.

It is also set out in the Development Plan that “there is less value in adopting more restrictive residential parking standards for the purposes of encouraging sustainable travel.”

Section 12.4.5.2 of the County Development Plan sets out that the Planning Authority may allow a deviation from the maximum or standard number of car parking spaces specified in Table 12.5 of the Plan or may consider that no parking spaces are required having regard to the assessment criteria set out in Section 12.4.5.2 (i):

- “Proximity to public transport services and level of service and interchange available.”

Applicant’s Response:

The subject site is located in close proximity to high-frequency public transport. The R118 (Glenageary Avenue) comprises a Quality Bus Corridor with several other bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area.

There are two bus stops located at the subject site’s boundary. The bus stop on Sallynoggin Road (Stop 3205) is serviced by route no.:

- 7A (Mountjoy Square – Loughlinstown Park)



- 7D (Mountjoy Square – Castle Street)
- 45A (Dún Laoghaire – Kilmacanogue)
- 45B (Dún Laoghaire – Kilmacanogue)
- 111 (Dalkey – Brides Glen)

The bus stop located on Glenageary Avenue (Stop 7646) is serviced by route no. 7 (Mountjoy Square – Brides Glen Bus Stop)

The site is also in close proximity to the BusConnects Quality Bus/Bus Priority Routes L22 (Dún Laoghaire – Brides Glen), L11 (Dún Laoghaire - Kilmacanogue), 98 (Mountjoy Square via City Centre – Loughlinstown Park), P12 (Dalkey – Townsend Street)

The site is also located c. 1.2km (16-minute walking distance) from the Glenageary DART Station. Dun Laoghaire DART Station is located c. 2km (26-minute walking distance) from the site.

It is respectfully submitted that the level of public transport provision in the immediate surrounding area of the subject site warrants a reduced car parking provision in particular in trying to promote sustainable transport modes.

- *“Walking and cycling accessibility/permeability and any improvement to same.”*

Applicant’s Response:

There is a wide range of services and uses in the immediate surrounding area including several schools and childcare facilities within the vicinity, local shops, pharmacy, Discount Foodstore, Sallynoggin Youth & Community Facility for example.

The subject site is also located in proximity to various locations such as Dalkey, Glasthule, Dun Laoghaire, Monkstown and Blackrock which offer a wide range of services and amenities. These are active urban areas which are pedestrian friendly and offer a high-quality public realm served by active road links between each location. It is the design team’s intention to propose a development which will help to improve the Glenageary area which is currently underutilised with a lower quality public realm. From the outset, it was the design team’s intention to create a scheme that will integrate into the surrounding area while also making a positive contribution to the improvement of legibility by proposing a new public plaza with active ground floor uses contributing to the public realm within the site that creates a destination point and meeting place.

The subject site is also proximate to the proposed improvements by Dun Laoghaire Rathdown County Council under the Part 8 Application for Active Travel Improvements: DLR Central; which aims to provide high quality pedestrian and cycling infrastructure from Glenageary Roundabout through Glenageary Road Upper to its junction with Kill Avenue/Oliver Plunkett Road/Highthorn Park as per Figure 2 above in Section 4 of this Report.

This scheme will directly further enhance the accessibility and connectivity of the subject site to the wider surrounding area. This range of accessibility by public transport, cycling and by foot allows access to local services, nearby employers and the City Centre.

- *“The range of services available within the area.”*

Applicant’s Response:

As mentioned previously, there is a wide range of uses in the immediate surrounding area including several schools and childcare facilities within the vicinity, leisure facilities, local shops, public transport stops only a short walk away.

All of the above considered, it is our view that the reduced car parking standards can be applied to the site within the context of the County Development Plan 2022-2028. We also refer the Planning Authority to the accompanying

10.5.10 Cycle Parking

The Council has cycling standards entitled “Standards for Cycle Parking and associated Cycling Facilities for New Developments” published January 2018. The following requirements for cycle parking apply under the policy guidelines:

Type	1 short stay (visitor) parking space per:	1 long stay parking space per:	Required Spaces	Proposed Spaces
Apartments	5 units	1 unit	27.6 visitor + 138 resident Total: 166	56 visitor + 254 resident Total: 310

Table 16 – Bicycle Parking Requirements and Provision

The bicycle parking area will provide for a total of 310 no. bicycle parking spaces. This level of cycle parking provision is considered appropriate for the proposed 138 no. residential units and justified in the context of this site location, public transport accessibility and the quantum of car parking proposed.

In accordance with DLRCC’s standards, we confirm that a minimum of 50% of the total surface level / short-term bicycle parking spaces are to be covered by way of the proposed bicycle shelters detailed in the Landscape Design Statement prepared by Parkhood Landscape Architects and by the link between Block A and Block B. It is considered that the bicycle shelter design proposed is visually appealing through a dynamic shape combining a robust support structure and visually light glass.

10.5.11 Height

Appendix 5 of the County Development Plan provides for a Building Height Strategy.

Policy Objective BHS 1 within the Building Height Strategy sets out the following:

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

A step back design is proposed so as to respect the existing built heights. The scheme responds to its context through the provision of a gradual increase in height from the prevailing contextual height to increased height between 4 to 7 storeys with a stepped approach to create a variety and visual interest. The increased height will provide a focal point at Glenageary Roundabout and the buildings will represent a landmark and will contribute to the legibility of the area, framing significant vistas within the locality.

We refer the Planning Authority to the Building Height Strategy Section of the Architects Design Presentation prepared by John Fleming & Associates which assesses how the proposal conform to the relevant Building Height Performance Based Criteria “At District/Neighbourhood/Street Level” as set out in Table 5.1 in Appendix 5.

11 Conclusion

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at a key junction to the south of Glenageary Roundabout, a large, underutilised site that is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- The site occupies a strategic position as a corner site in urban design terms with the potential to create a focal point at the Junction of Sallynoggin Road and Glenageary Avenue. The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this suburban vacant site.
- A total of 138 no. residential apartment units are proposed, which are broken down as 37 no. 1 bed units, 68 no. 2 bed (4 person) units, 6 no. 2 bed (3 person) units and 27 no. 3 bed units with associated residential amenity services in 2 no. interlinked blocks ranging in height from 4-7 storeys over basement level. The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.
- A total of 7 no. commercial units are proposed at ground floor level to include 2 no. restaurants, retail – clothing units, retail – florist units, retail – pharmacy unit and hairdresser unit. A childcare facility with dedicated children’s outdoor play area is also proposed.
- Variation in building height along with a mix of apartment types, ground floor level commercial activities, all combine to provide a rich living environment close to a host of facilities and landscape amenities.
- The proposed scheme with its active frontage at ground floor level and the proposed architectural features of an arch creates a welcoming pedestrian passageway from the roundabout through an active internal public plaza connecting to the adjoining public realm and neighbouring lands.
- The vision for the project scheme is to create a unique sense of place with a strong community identity characterised by the public plaza will act as prominent focal point set within the area.
- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g. Housing for All, NPF, Rebuilding Ireland and RSES) and we ask that that is considered in the review of this proposal.
- The proposed use is acceptable in principle at this site and under the ‘NC’ zoning. There is therefore an appropriate planning context for this proposal along with the childcare facility proposed.
- We confirm that we have addressed insofar as possible all feedback and Opinion Items received from Dún Laoghaire-Rathdown County Council.

We ask that these points are considered in the review of the proposal, and we trust that this planning application will be viewed as a more positive move towards the delivery of sustainable development on suitably zoned, vacant lands.