

**D C W N E Y**

29 Merrion Square, D02RW64

# **Supporting Planning Report for Proposed Large Scale Development (LRD)**

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**Lands at Riverside Cottage,  
Kilgobbin Road,  
Stepaside,  
Co. Dublin**

**Client: Kilgobbin Apartment Limited**

**September 2025**

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## INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Planning Statement on behalf of our client and the applicant, Kilgobbin Apartment Limited, for a proposed Large Scale Residential Development on lands at Riverside Cottage, Kilgobbin Road, Stepside, Co. Dublin.

Planning permission is being sought from Dún Laoghaire-Rathdown County Council in relation to the following proposed development:

*“Permission is sought by Kilgobbin Apartment Limited, for a Large-Scale Residential Development on lands at Riverside Cottage, Kilgobbin Road, Stepside, Dublin 18. The proposed Large-Scale Residential Development (LRD) will provide 120 no. apartment units within 2 no. blocks ranging in height from 4- to 6-storeys. The development will consist of; Block A, consisting of 44 no. units (27 no. 1 bed (2-person), 13 no. 2 bed (3-persons), 1 no. 2 bed (4-persons) and 3 no. 3 bed (5-persons) of 4- to 5-storeys height and roof terrace; Block B, consisting of 76 no. units (40 no. 1 bed (2-persons), 12 no. 2 bed (3-persons), 16 no. 2 bed (4-persons) and 8 no. 3 bed (4-persons) and be 5- to 6-storeys height. All units will be provided with terraces/balconies.*

*The proposed development will provide all associated public open space and play area, 54 no. car parking spaces including accessible parking and Electric Vehicle parking, 273 no. bicycle parking spaces, 3 no. motorcycle parking spaces, bin/waste store, bulky goods stores and plant room at ground floor levels, 1 no. detached ESB substation and 1 no. detached bicycle store. The proposed development will also provide for all associated site development and infrastructural works including foul and surface water drainage, roads, footpaths, landscaping, boundary treatment, public lighting and a pedestrian and cycling pathway connecting Belarmine Vale and Kilgobbin Road. Vehicular access to the development will be from Belarmine Vale.”*

The proposed development has been developed in accordance with prevailing policy contained within the Dún Laoghaire-Rathdown County Development Plan (2022-2028) and will contribute to the realisation of the housing and population targets for the Stepside area. The submitted documents demonstrate that the proposed development will result in the creation of a sustainable residential community and provide for a greater range of accommodation within the local area.

The design team is as follows:

- DOWNEY – Planners and Architects;
- Courtney Deery Archaeology & Cultural Heritage – Archaeology & Cultural Heritage;
- John Morris Arboricultural Consultancy Ltd. - Arborist;
- Digital Dimensions – Daylight Analysis and 3D Dimensions;
- Synergy Environmental Ltd. t/a Enviroguide Consulting. – Environmental Consultants;
- RM Breen Engineering Limited T/A RM Breen Associates – Electrical Engineers;
- Molony Millar Consulting Engineers – Civil & Structural;
- Studio Glasu - Landscape Architects;

- Altemar - Environmental Consultants;
- NRB Consulting Engineers – Transport Engineers;
- Kavco Group – Enviroguide.

## PART A – PLANNING REPORT

### 1.0 SITE LOCATION AND DESCRIPTION



*Figure 1. Aerial View of the Subject Site (approximate boundaries of the site outlined in red).*

The lands, which are subject to this report, are as previously mentioned, located within a mostly undeveloped greenfield site located adjacent to Kilgobbin Road, Sandyford, Co. Dublin, and within the administrative area of Dún Laoghaire Rathdown County Council. This subject site is situated 850 metres west of the Gallops Luas stop, 600 metres east of Belarmine Village Centre and Plaza, 800 metres west of the Leopardstown Village Centre Shopping Mall, 2km southeast of Carrickmines Retail Park, within close proximity of numerous recreational amenities and sports club and is circa 16km south of Dublin City Centre.

The subject site is bordered to the south by the ruins of Kilgobbin Castle, to the east by Kilgobbin Road, to the west by the Belarmin Vale residential development and neighbourhood centre as well as two separate Primary Schools (Gaeilscoil Thaobh Na Coille Primary School and Stepside Educate Together National School) and other established residential developments such as Sandyford Hall to the north.



Figure 2. Aerial View of Subject Site (approximate boundaries of the site outlined in red).

With an approximate area of 1.21ha, the subject site is currently mainly greenfield in nature, with an existing residential dwelling known as 'Riverside Cottage' being located alongside its western site boundary. The following images illustrate the current state of the site from a site visit conducted by DOWNEY.



Figure 3. View North across the Site from the Southwestern Boundary.



*Figure 4. View from the Southern Boundary.*



*Figure 5. View South from the Northern Boundary.*

The site is located within an extremely well-connected location, just off Kilgobbin Road and Ballyogan Road and the M50 motorway linking the area to the City Centre by car.

Bus stops in the immediate area are served regularly by bus routes including the 44, 47 and 118. These routes can take local residents from Belarmine, Stepside through Ringsend to Pearse Street, from Enniskerry village through O'Connell Street to DCU and from Kiltiernan village through Donnybrook to Eden Quay.



Figure 6. Map Illustrating Bus Stops (highlighted in yellow) in Proximity to the Subject Site (Highlighted in Red).

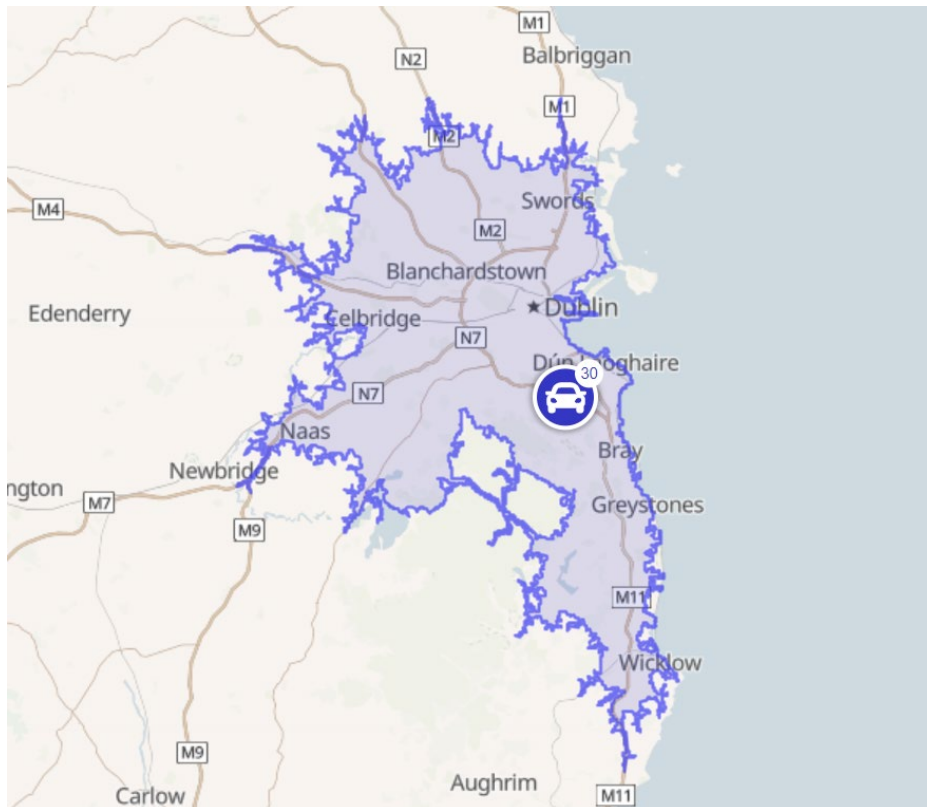


Figure 7. Map Illustrating Accessible Areas by a Thirty-Minute Drive from the Subject Site.

It should be noted that the subject site is located within an 850-metre walking distance of the Gallops Tram Stop, which serves the Luas Green Line which operates Monday to Friday 05:30 to 00:30, Saturdays 06:30 to 00:30 as well as Sundays and Public Holidays 07:00 to 23:00.



Figure 8. Map Illustrating the Proximity between the Subject Site and The Gallops Luas Stop.



Figure 9. Map Illustrating the proposed Bray – City Centre BusConnects Route.

It should also be noted that as part of the overall Dublin BusConnect Scheme, several new routes are proposed which are in immediate proximity to the site of this assessment. These include firstly, Other City Bound Routes, new services operating into Dublin City Centre, such as the no. 86, 87 and 88.

Secondly, a new Local Route, services providing important connections within local areas linking to local retail centres and to onward transport connections, named the L13 (Ringsend Bus Garage) is planned to pass by the subject site's eastern boundary as is the proposed P13 (Kilternan) Peak-Only Route.

These proposed public transport upgrades will have the effect of ensuring consistent and timely public transport into several areas of Dublin including the City Centre from the location of the subject proposal, in turn ensuring that the proposed development on site aligns with the principles of sustainability and limiting any car dependency for future residents.

## 2.0 PLANNING HISTORY

DOWNEY have researched the planning history pertaining to the subject site and found here have been two previous planning applications pertaining to the subject site, dating from 2005 to 2018. These previous applications are as follows:

- **Reg. Ref. D05A/1000 (PL06D.217333)** – By Order dated 10<sup>th</sup> July 2007, An Board Pleanála granted planning permission to Douglas & William Richardson for a development comprising of 8 no. detached dwellings (7 no. three storey, five bed units; 1 no. two storey, four bed unit); and 26 no. apartments (20 no. 2 bed and 6 no. three bed units) in a single three and four storey block with feature corner element.
- **Reg. Ref. D18A/0074 (ABP-303695-19)** – By Order dated 16<sup>th</sup> July 2019, An Bord Pleanála granted planning permission to William & Douglas Richardson for a development comprising the demolition of the existing dwelling and the construction of 4 no. residential blocks ranging in height from 2 to 4 storeys, accommodating 43 no. residential duplex and apartment units, all with balconies or terraces (9 no. 1-bed, 19 no. 2-bed, 15 no. 3-bed) with vehicular access from Belarmine to the west and a pedestrian/cycle connection to Kilgobbin Road to the east.
- **Reg. Ref. ABP32193725** - This application is currently live on the site and was registered 27<sup>th</sup> February 2025 for development consisting of flood defences at key locations along the Carrickmines and Shanganagh rivers. A decision on this application is pending at the time of lodging this LRD application. It is noted that while the proposed LRD application is not dependent on the flood relief scheme, the provision of the flood relief scheme would benefit the proposed residential development, and both developments can be brought forward at the same time.



The proposed development, subject of this LRD planning application, has been informed by a Section 247 Meeting (PAC/LRD1/027/24) and Section 32B Meeting (PAC/LRD2/001/25) with Dún Laoghaire-Rathdown County Council. The changes and alterations to the proposed development following each of these meetings is described below.

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The context and design approach to the application site and for the proposed development, have been subject to pre-planning consultation with the Dún Laoghaire-Rathdown County Council Planning Department under Section 247 of the Planning and Development Act, 2000 (as amended). The S.247 pre-planning meeting was held via Microsoft Teams on 31<sup>st</sup> October 2024. The pre-planning Ref. No. for the meeting was PAC/LRD1/027/24.

Some of the main feedback received from Dún Laoghaire-Rathdown County Council included the following items:

**Design, Building Height and Layout:** Concerns raised over the impact on the Castle and inquired about an Archaeological Impact Assessment, CGIs and contextual images to be provided; Reference to Ballyogan LAP, particularly Figure 4.11 and Table 4.6 of the BELAP; Attention to be applied to D18A/0074 and the issues relating to permeability, Specific Local Objective 81 of the CDP and the GDA Cycle Network Plan 2022; query on north facing apartments; Concern expressed over the possible monotonous finish of the 6 storey building; Unit mix not met particularly 3 beds; Communal open space is gated?; Reduction needed of high level of hardstanding in the plan.

**Landscaping and Public/Communal Open Space:** Queried that the communal open space is North facing; Against building through the trees-to be moved north; Daylight/Sunlight analysis required; Stated the communal open space should be exclusively for use by residents and directed the applicant to section 12.8.3.2 of the CDP; Queried south facing communal open space; The applicant noted the flood risk at the Northeast of the site as a potential issue; Currently there is 12% open space proposed; Would like to see the hard standing areas reduced and they would like to see more soft areas, soft area planting, etc.

**Residential/Visual Amenity and facilities:** Noted lack of storage and external storage for bulky items would need to be addressed; Advised that justification would be required the applicant wanted to progress without a creche/childcare facility; Noted that councils childcare committee will be involved in assessing the application.

**Transport:** Inclusion of pedestrian link is crucial from the Council's perspective; No objection to combining the fire tender access with a greenway; Justification required for reduced parking; Noted that a shared car parking scheme would be desirable; Requested that the scale and size of the road layout be minimised, and the dead space on the corners of the layout be redesigned; Type 2 and type 3 Zebra pedestrian crossings requested; Applicant requested to tighten up T-junctions, and insert appropriate crossing points, unobscured by parking; Asked about a pedestrian connection to Sandyford Hall on a previous application and the further information that was requested from previous applicants; Is it worth exploring? If not, the applicant should state the reasons why; Discrepancy in distance to LUAS.

**Surface Water Management and Flood Risk:** Requested SSFRA before next stage; Applicant was asked to consider surface water management and nature-based solutions; The PA confirmed there should be no culvert on an open water channel and open water sources are not to be closed; The applicant responded that they would only be closing an open channel at the site access.

**Ecological/Environmental/Biodiversity Matters:** Environmental Dept unable to attend meeting but provided a report.

**Part V considerations:** Advised the applicant to identify the units for Part V and to make contact with the housing dept for further discussions.

**First LRD Section 32B Pre-Application Consultation March 2025, PAC/LRD2/001/25.**



**Figure 12: Proposed Site Plan with Ground Floor Plan LRD Section 32B Pre-Application Consultation March 2025.**

The latest LRD pre-application meeting that took place on the 6<sup>th</sup> March 2025, which has determined multiple changes and alterations to design aspects of the previously submitted plans.

Some of the main feedback received from Dún Laoghaire-Rathdown County Council included the following items:

**Design, Building Height, and Layout:** Noted concerns with the level of hardstanding in the scheme, Public open spaces and linkages need to be developed to taking in charge standard, this includes the POS, the landscaping and the east-west route through the site; Justify the building heights; Reference Kilgobbin Castle in their application; Detail from conservation perspective on the Castle; The POS must be located in A zoned land, and any additional POS can be in the F zoned land; Noted that communal open space should be for the use of residents only.

**Landscaping and Public/Communal Open Space:** Taken in charge information to be updated to standards; Beneficial to retain both the trees and the parking; if playgrounds are to be taken in charge, more detail is required within the TIC map.

**Residential/Visual Amenity and facilities:** Concern was raised over the level of external storage for; A bike doctor/repair station is included in the application as was suggested by the Planning Authority; Justification needed for the lack of a childcare facility within the scheme.

**Transport:** Expressed concern about the proposed road layout as it seems to be a hybrid design of a road carriageway and pedestrian refuge integrated; also requested that a footpath is provided at the left boundary of the site; Justification of the car parking and confirm that there will be no overspill of parking into Belarmine; Cycle and pedestrian route must comply with the cycle design manual; The applicant said they will discuss with the Transport department offline; Applicant is to amend proposed design to safeguard tree located at the southern exit; Noted that they would also engage the Active Travel section in this discussion about the cycle/pedestrian route.

**Surface water:** Noted the lack of a site specific flood risk assessment and that the justification test can't be passed by the applicant themselves; Concerns raised over surface water and queried if the applicant was meeting the 70% green roof requirements; Noted that run off rates should be checked and agreed before final submission; A draft drainage plan should be sent into the Water and Drainage Dept before final submission.

**Ecological/Environmental/Biodiversity Matters:** Advised that bat surveys, ecological surveys updated construction management plan, operational waste management plan and a swept path analysis, ecological and AA reports to be provided; Particular attention to be paid to noise management.

**Part V considerations:** Regarding Part V, the PA noted that the applicant should make contact with the Housing Dept prior to lodging the stage 3 application.

**Archaeological/heritage matters:** Noted that an archaeological report would be required detailing the impact of the scheme on the castle.

#### **Any Other Matters:**

The applicant was advised that they will need to make space for lighting; Noted that EV infrastructure will not be taken in charge; Noted that Communal Open Space should be for the use of residents only; The applicant was asked to provide clarity in their application of how this would be managed; The PA also asked the applicant to provide clarity on the boundary treatment at Kilgobbin Road; As per Section 5.8 of the CDP – it is an aim of the PA to retain the rural character here; Noted that the delivery of SLO81 would be a positive for the area.

#### **Pre-Planning Consultation Conclusion**

This proposal has been heavily revised on foot of previous Pre-Planning meetings regarding development of this subject site which took place on the 31.10.2024 and 14.02.25 respectively. The subject proposal has sought to overcome the concerns raised, as discussed above.

The revised proposal seeks to provide a total of 120 residential units within 2 no. blocks ranging in height from 4- to 6-storeys. The proposed development will provide all associated public open space and play area, 54 no. car parking spaces including accessible parking and Electric Vehicle parking, 273 no. bicycle parking spaces, bin/waste store and a plant room at ground floor level; 1 no. detached ESB substation.

The subject proposal will provide significant contribution towards increasing the housing supply and housing choice within the Kilgobbin area and wider Dún Laoghaire-Rathdown County administrative

area while showing adequate regard for the existing residential amenities of neighbouring residential areas.

The proposed scheme under this application will provide for an appropriate high density of development within this location as is advocated for by policy guidance from local to national level, with an appropriate mix of units catering to a range of people at different stages of life and catering to an established existing need for development.

The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Government policy and guidance.

It is submitted that the current proposal, having taken into account the Council's concerns will provide a locally beneficial development which is suitably zoned for the sustainable growth of the settlement of Kilgobbin in a sequential and compact manner as advocated by planning policy and guidance at all levels from local to national level. A separate report, *"Statement of Response to Dun Laoghaire Rathdown County Council LRD Opinion"* has been prepared by DOWNEY and is submitted under separate cover and address in full the items raised by the Planning Authority in their Opinion letter.

## 4.0 PROPOSED DEVELOPMENT

As demonstrated in the particulars accompanying this Planning Statement, the proposed development consists of the following:

*"Permission is sought by Kilgobbin Apartment Limited, for a Large-Scale Residential Development on lands at Riverside Cottage, Kilgobbin Road, Stepside, Dublin 18. The proposed Large-Scale Residential Development (LRD) will provide 120 no. apartment units within 2 no. blocks ranging in height from 4- to 6-storeys. The development will consist of; Block A, consisting of 44 no. units (27 no. 1 bed (2-person), 13 no. 2 bed (3-persons), 1 no. 2 bed (4-persons) and 3 no. 3 bed (5-persons) of 4- to 5-storeys height and roof terrace; Block B, consisting of 76 no. units (40 no. 1 bed (2-persons), 12 no. 2 bed (3-persons), 16 no. 2 bed (4-persons) and 8 no. 3 bed (4-persons) and be 5- to 6-storeys height. All units will be provided with terraces/balconies.*

*The proposed development will provide all associated public open space and play area, 54 no. car parking spaces including accessible parking and Electric Vehicle parking, 273 no. bicycle parking spaces, 3 no. motorcycle parking spaces, bin/waste store, bulky goods stores and plant room at ground floor levels, 1 no. detached ESB substation and 1 no. detached bicycle store. The proposed development will also provide for all associated site development and infrastructural works including foul and surface water drainage, roads, footpaths, landscaping, boundary treatment, public lighting and a pedestrian and cycling pathway connecting Belarmine Vale and Kilgobbin Road. Vehicular access to the development will be from Belarmine Vale."*

The subject proposal, it is submitted, would be consistent with the nature and scale of development envisioned for areas considered to be under the zoning designation of Objective A, with development of a residential nature proposed to take place in an appropriate location with extensive present and

future public transport links which is currently underutilised as is a key aim of both the Local Authority and national planning guidance at present. It is also cognisant of the permitted scheme approved under Reg. Ref. D18A/0074 (ABP Ref. 303695-19).

The proposed development has been designed to provide high-quality homes that will contribute positively to this area, where demand for housing has been consistent.

It is submitted that the proposed development is appropriately designed and scaled having regard for the site's setting. Concerning height and scale, as illustrated in the plans and particulars submitted with this request, the development has been scaled in a manner whereby the amenities of neighbouring residential development are not adversely affected in any way, with no degradation of privacy nor overlooking arising from this subject development.

The subject proposal, it should be noted, differentiates from the development permitted under Application Reg. Ref. D18A/0074. These differences include and are not limited to the removal of basement car parking, no longer seeking to demolish 'Riverside Cottage' which is a habitable dwelling of (c.158 sqm), located on the eastern side of the site, and an increase to 120 no. residential units in comparison to the previously permitted application on site, along with changes of typology and unit mix.

DOWNEY submit that the demolition of the subject dwelling on site has been deemed unnecessary, and therefore that dwelling is not included within the red line boundary and will be left in-situ along with its attendant garden.

Current planning policy, it is submitted, aims for a sustainable form and of density for residential development, along with a reduction in car use and reliance within areas as exceptionally well connected as this subject site. In light of this, a decrease of car parking from 69 to 54 spaces, an increase in bicycle parking spaces from 56 to 273 and increase in proposed residential units from 43 to 120 in comparison to the previously permitted residential development on site is observed in order to ensure the proposed development properly aligns with, and reflects, the Local Authorities vision for the compact development of a currently underutilised site within an extremely well-connected area of Dún Laoghaire.

The proposed development therefore will aid the Local Authority in achieving its vision of compact urban form and growth within more appropriate and accessible locations through the revitalisation of under used and underdeveloped sites.

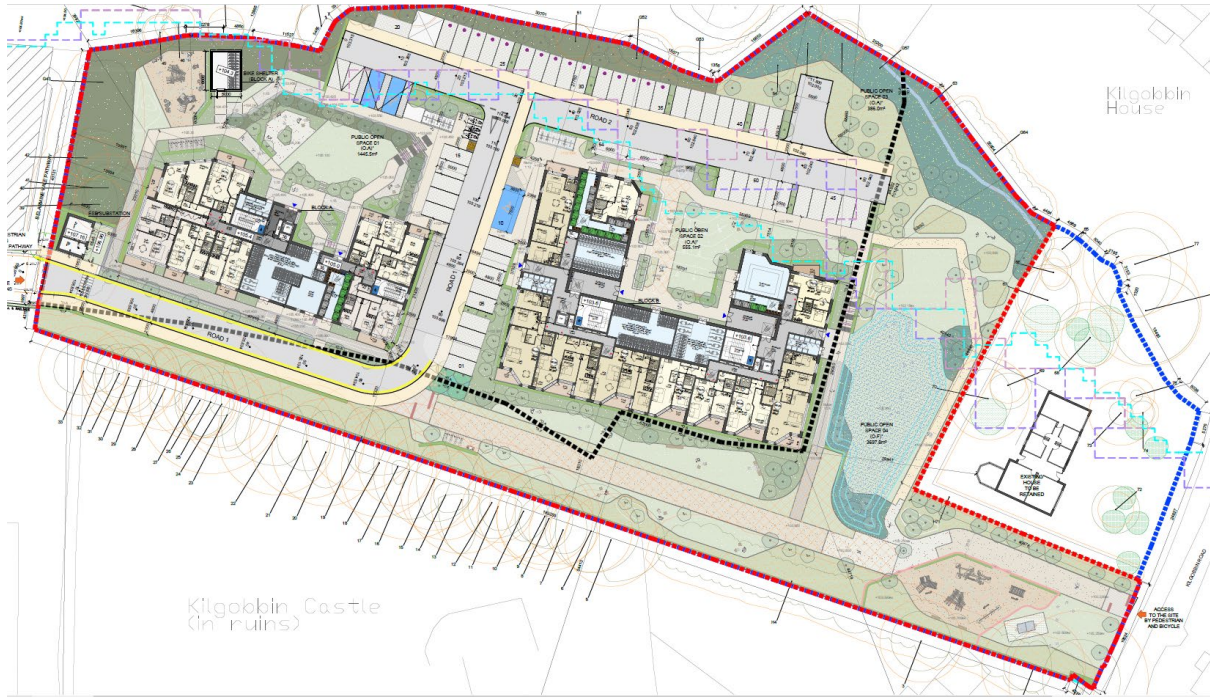


Figure 13. Proposed Site Layout Plan.

The proposed scheme, as illustrated within this document, will provide for a high-density development within a location of immediate proximity to existing and future public transport networks of significant capacity. The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Government policy and guidance. The proposed unit mix is considered to be typical of a development of this nature, considering factors such as market demand, in turn the development is to provide a range of 1, 2 and 3 bed units for both individuals and families at all stages of life, in turn, enabling the development of a new community within the most strategic of locations.

The proposed development in effect promotes the delivery of sustainable residential development on appropriately zoned lands, which will facilitate increased housing supply and choice within Kilgobbin and the surrounding Dún Laoghaire Rathdown administrative area.

DOWNEY are of the considered opinion that this proposal is adequately suited to the site having regard for its surrounding environment.

Table 1 below gives an overview of the key data for the proposed development.

Site Area	1.2193ha. (0.78ha zoned residential)
Units	120
Dual Aspect	53%
Density	98.4 units/hectare
Net Density of Residentially Zoned Lands	167.8 units/hectare
Building Heights	4-5 storeys (Block A), 5-6 storeys (Block B)
Car Parking spaces	54
Bicycle Parking spaces	273
Plot Ratio	0.87

<b>Site Coverage</b>	18%
<b>Total Communal Amenity Space</b>	852 sq. m. (7%)
<b>Public Open Space (Zoning Objective A)</b>	2,387 sq. m. (19.6%)
<b>Public Open Space (Zoning Objective F)</b>	3,698 sq. m. (30.3%)

Table 1: Subject Proposal Details.

The council is invited to refer to the associated drawings and Design Statement, prepared by DOWNEY Architecture, which are submitted within this Planning Statement for further details on the proposed development.

The proposed development promotes the delivery of sustainable residential development on a currently undeveloped greenfield site, which in turn, facilitate increased housing supply and choice within the Stepside area, its environs and the surrounding Dún Laoghaire Rathdown administrative area. Indeed, the development of this subject site provides for the efficient use of residentially zoned land located in close proximity to an existing Luas Green Line Stop.

The proposed development aims to provide a pedestrian and cycle route through the site which will connect Belarmine Vale to Kilgobbin Road, requiring the removal of a section of the existing wall. This will be done with the utmost care to ensure that majority of the existing wall is retained and to ensure sufficient visibility for both pedestrians and cyclists. This entrance onto Kilgobbin Road will have speed-controlled gates to ensure a safe and gradual entrance onto Kilgobbin Road, supporting the strategic implementation of this route and also complying with *Section 5.8 of the County Development Plan 2022-2028*. The public open space and retaining the existing wall at the entrance to the site will significantly help with integrating and maintaining the existing character of Kilgobbin Road.

Overall, the proposal, as illustrated within this document, is consistent with the policies of the Dún Laoghaire County Development Plan 2022-2028, promoting the principles of proper planning and sustainable development and will a positive and significant contribution towards the supply of housing within the locality while ensuring protection of the area of the subject site subject to an open space zoning designation.

## 5.0 PLANNING POLICY AND CONTEXT

The proposed development is consistent with the relevant national, regional, and local planning policies as they pertain to these lands. In this regard, Part B of this report contains a Statement of Consistency with Planning Policy. In order to avoid undue repetition, to Dún Laoghaire-Rathdown County Council are invited to refer to Part B of this report to confirm how the proposal is consistent with the relevant national, regional, and local planning policy.

Notwithstanding that, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning. The subject site is under two different zoning designations, Objective A and Objective F. As illustrated in the image below, the central and eastern sections of the site are zoned Objective 'A', the zoning vision objective for which is states as *"to provide residential development and improve residential amenity while protecting the existing residential amenities"*, while the rest of the site is zoned under Objective 'F', the zoning vision objective for which is states as

“to preserve and provide for open space with ancillary active recreational amenities”. This zoning provision will be further explored in Part B of this report.



Figure 14. Land Use Zoning Map Extracted from the Development Plan (application site outlined in red).

## 6.0 CONCLUSION

This planning report has been prepared in support of the proposed residential development on lands adjacent to Riverside Cottage, Kilgobbin Road, Stepside, Dublin. The proposed development seeks to provide 120 no. residential units in 2 no. blocks, ranging in height from 4-6 storeys.

The proposed development is in accordance with the land use zoning pertaining to the subject site. The subject site is suitably located within an existing built-up area and is well served by existing public transport, notwithstanding public transport improvements such as BusConnects, as well as other commercial, recreational, and other local services and amenities for future residents.

The proposed scheme under this application will provide for an appropriate density of residential development within this location, which is within walking distance of LUAS and other public transport. The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Government policy and guidance.

The applicant has previously engaged in Stage 1 and Stage 2 Pre-Planning Consultation with to Dún Laoghaire-Rathdown County Council and have sought to address all items raised during these consultation periods. A full Statement of Response to Dún Laoghaire-Rathdown County Council's Notice of Pre-Application Consultation Opinion has been prepared by DOWNEY and is submitted under separate cover. DOWNEY, on behalf of the applicant, now wish to submit this Stage 3 LRD Planning Application to Dún Laoghaire-Rathdown County Council. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from Dún Laoghaire-Rathdown County Council in due course.

## PART B – STATEMENT OF CONSISTENCY

### 1.0 NATIONAL PLANNING POLICY

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework – First Revision (April 2025)
- Project Ireland 2040: National Development Plan 2021-2030
- Housing for All: A New Housing Plan for Ireland
- Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)
- Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)
- Sustainable Urban Housing: Design Standards for New Apartments (Dec 2023)
- Sustainable and Compact Settlement Guidelines for Planning Authorities (2024)
- Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)
- Affordable Housing Act 2021 & Housing Circular 28/2021
- The Housing Agency Statement of Strategy 2022-2024
- Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Childcare Facilities operating under the ECCE Scheme (Circular Letter: PL 3/2016)
- Smarter Travel: A Sustainable Transport Future
- Design Manual for Urban Roads and Streets (DMURS)
- Cycle Design Manual (June 2023)
- EIA Directive
- Bird and Habitats Directive - Appropriate Assessment
- The Planning System and Flood Risk Guidelines (2009)
- All-Ireland Pollinator Plan 2021-2025
- National Adaptation Framework: Planning for a Climate Resilient Ireland
- Climate Action Plan 2024

#### 1.1 Project Ireland 2040 – National Planning Framework – First Revision (April 2025)

The Revised National Planning Framework (NPF) provides an updated strategic vision for Ireland's spatial and economic development, ensuring that planning policy responds effectively to current demographic, economic, and environmental realities. A central function of the revised NPF is to guide the necessary reviews of Regional Spatial and Economic Strategies (RSES) and local authority development plans, aligning them with updated national objectives.

The NPF outlines a number of strategies and policy objectives. There is a major new policy emphasis on compact growth and urban consolidation. In terms of 'compact growth', the NPF targets a great proportion (40%) of future housing developments to be within and close to the existing footprint of built-up areas. It seeks to make use of under-utilised land and buildings, including 'infill' and

‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

In this regard, the following policies and objectives pertain to the subject application:

**National Policy Objective 7** *“Deliver at least 40% of all new homes nationally within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”*

**National Policy Objective 20** – *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

**National Policy Objective 37** – *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”*

**National Policy Objectives 43** – *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

**National Policy Objective 45** – *“Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”*

Within the National Planning Framework, it is evident that there is a strong emphasis placed on increased development in existing built-up urban areas.

DOWNEY are of the considered opinion that the proposed residential development is in line with the objectives of the National Planning Framework as it states that, “to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities”. The National Planning Framework also states that, “this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector”.

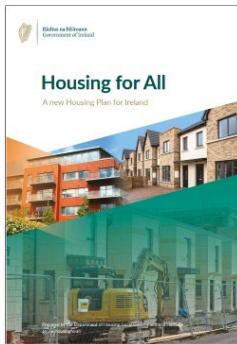
The proposed development is located within Kilgobbin, a large suburban town within south Dublin, with a growing population as of the latest national census, which boasts significant connectivity and access to public transport, with significant further improvements in the provision of public transport planned as part of both BusConnects public transport initiative. Concerning the subject site itself boasts excellent connectivity to several existing high frequency bus stops within proximity to the site.

The National Planning Framework also states that, “while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)”. It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated

within the Project Ireland 2040 plan that, “in many European countries it is normal to see 40-60% of households living in apartments.”

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in Dublin. It is therefore considered that the provision of 120 no. new residential units will assist in achieving the objectives of the National Planning Framework. In light of the above, DONWEY submit that the proposed development is consistent with the policies and objectives of the NPF.

## 1.2 Housing for All: A New Housing Plan for Ireland



In September 2021, the Government launched *Housing for All*, which is a plan to increase the supply of housing to an average of 33,000 per year over the next decade. The plan provides for an optimal mix of social, affordable, and private housing for sale and rent. These measures are supported by over €4 billion in guaranteed State funding every year, the highest ever level of government investment in building social and affordable housing. The plan also includes measures to support availability of the land, workforce, funding, and capacity to enable both the public and private sectors to meet the targets. The plan is based on four pathways, leading to a more sustainable housing system:

- Support home ownership and increase affordability;
- Eradicate homelessness, increase social housing delivery, and support social inclusion;
- Increase new housing supply; and
- Address vacancy and make efficient use of existing stock.

Overall, the supply will have to increase to 33,000 new units, on average, per annum up to and including 2030. The annual HNSA projection until 2030, breakdown by tenure type includes 11,800 new private ownership homes, 6,500 new private rental homes, 4,100 new affordable homes, and 10,300 new social housing homes.

The proposed development will aid the government to reach these targets through the provision of an additional 120 no. residential units of an appropriate mix of dwelling types located in the Dun Laoghaire-Rathdown administrative area.

## 1.3 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

‘Rebuilding Ireland, An Action Plan for Housing and Homelessness,’ provides a multi-stranded, action-orientated approach to achieving many of the Government’s key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed

to remain in their homes or be provided with appropriate options of alternative accommodation especially those in family emergency accommodation.

The Action Plan comprises of 5 key pillars which are, addressing homelessness, accelerating social housing, building more homes, improving the rental sector, and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rental sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- *Addressing the unacceptable level of households, particularly families in emergency accommodation,*
- *Addressing a growing affordability gap for many households wishing to purchase their own homes.*
- *Maturing the rental sector so that tenants see it as one that offers security, quality, and choice of tenure in the right locations and providers see it as one they can invest with certainty.*
- *Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,*
- *Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.*

The provision of 120 no. residential units within this strategically located subject site, of benefit of a zoning designation explicitly seeking residential development will help the government to achieve the objective of the Housing Action Plan. Thus, it is submitted that the proposed development is consistent with the policy in this regard.

#### **1.4 Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025)**

These guidelines were published on the 8<sup>th</sup> of July, and they set out guidance, standards and policy requirements in relation to the design of apartment developments to take account of current Government policy and economic, social and environmental considerations.

More broadly, these Guidelines reflect the revised legislative framework that is set out in the Planning and Development Act 2024. The continued importance of the plan-led system that is informed by national policy is maintained and further clarified.

These Guidelines set out, for consistent application by all planning authorities and An Coimisiún Pleanála, the particular design parameters that apply to apartment development, where the principle of the development of apartments at any particular site has already been established in accordance with the statutory plan and consideration of the policies, objectives and requirements of the SRDCSGs. Policies contained in these Guidelines include matters relating to:

- Apartment mix;
- Internal space standards for different types of apartments;

- Dual aspect ratios;
- Floor to ceiling heights;
- Apartments to stair/lift core ratios;
- Storage spaces; and
- Amenity spaces including balconies/patios.

The Guidelines also have specific planning policy requirements (SPPRS). The ones relevant to this application are as follows:

#### Housing Mix (SPPR 1)

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

The proposed development fully complies with SPPR 1 of the Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025). The unit mix for the development is displayed in the following table:

**Table 2: Mix of Units of Proposed Development.**

Block A and B					
	1 Bed	2 Bed (3 Person)	2 Bed (4 Person)	3 Bed	Total
Total	67	25	17	11	120
Percentage Mix %	56%	21%	14%	9%	100%

The mix of units outlined above contributes valuable diversity to the proposed unit mix. These units help accommodate a wider range of households, including small families, couples, downsizers, professionals and those seeking more generous living arrangements. The resulting mix demonstrates a balanced and inclusive approach to apartment provision. The proposed unit mix also supports the principles and goals of the National Planning Framework, supporting compact growth, sustainable urban living and the creation of inclusive and vibrant communities.

## Apartment Floor Areas (SPPR 2)

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

1-bedroom apartment (2 persons)	45 sq. m.
2-bedroom apartment (3 persons)	63 sq. m.
2-bedroom apartment (4 persons)	73 sq. m.
3-bedroom apartment (4 persons)	76 sq. m.

*The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.” (Modified by DOWNEY).*

Minimum Widths for the main living/dining rooms:

Studio apartment (1 person)	4 sq. m.
1-bedroom apartment (2 persons)	3.3 sq. m.
2-bedroom apartment (3 persons)	3.6 sq. m.
2-bedroom apartment (4 persons)	3.6 sq. m.
3-bedroom apartment (4 persons)	3.8 sq. m.
3-bedroom apartment (5 persons)	3.8 sq. m.

Minimum Widths for bedrooms:

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

In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes.

The proposed development complies with the new standards outlined above as all of the apartments meet the minimum requirements and all the apartments meet these guidelines with majority of the apartments comfortably exceeding the guidelines. Full details of which can be found in the HQA, prepared by DOWNEY attached under separate cover.

## Dual Aspect (SPPR 3)

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

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

The proposed development provides for 53% dual aspect units throughout the development. Therefore, easily exceeding the minimum standard set out in SPPR3 of the Sustainable Urban Housing: Design Standards for New Apartments (2025).

#### **Floor to Ceiling Height (SPPR 4)**

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

All proposed ground floor units comply with SPPR 4 as they meet or exceed 2.7m ceiling height, while all upper floors meet with or exceed 2.4m ceiling heights.

The following requirements are set within the statutory plans regarding internal storage requirements:

#### Internal Storage

1-bedroom apartment (2 persons)	3 sq. m.
2-bedroom apartment (3 persons)	5 sq. m.
2-bedroom apartment (4 persons)	6 sq. m.
3-bedroom apartment (4 persons)	6 sq. m.

*(Modified by DOWNEY)*

Apartment schemes should provide storage for bulky items outside individual units. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, the storage requirement may be relaxed in part, on a case-by-case basis, subject to overall design quality.

The proposed development complies with these new guidelines by meeting and/or exceeding the minimum internal storage requirements for the overall scheme. The proposed development now provides 42.8 sqm of bulky item storage (24.2 sqm for Block A and 28 sqm for Block B), as well as the required amounts of bin storage and internal bicycle storage. The need for adequate amounts of storage was highlighted by the Planning Authority during pre-planning stages of the proposed development and has been delivered as part of the final planning application.

#### Private Amenity Space

1-bedroom apartment (2 persons)	5 sq. m.
2-bedroom apartment (3 persons)	6 sq. m.
2-bedroom apartment (4 persons)	7 sq. m.

3-bedroom apartment (4 persons) 7 sq. m.

(Modified by DOWNEY)

The proposed development complies with these new guidelines by meeting and/or exceeding the private amenity space requirements of all the apartments. Further information relating to the breakdown of private open space is provided within the HQA, prepared by DOWNEY.

#### Communal Amenity Space

Unity Type	C.A.S. Per Unit	Number of Units	C.A.S Required
1-bedroom apartment (2 persons)	5 sq. m.	67	335
2-bedroom apartment (3 persons)	6 sq. m.	25	150
2-bedroom apartment (4 persons)	7 sq. m.	17	119
3-bedroom apartment (4 persons)	7 sq. m.	11	77
Total CAS Required			681 sq.m.
Total CAS Provided			852 sq.m.

(Modified by DOWNEY)

There is 852 sqm of communal amenity space being provided within the proposed development. This will provide significant amounts of communal amenity space for the residents and also ensures that the minimum requirements of the new guidelines are met and actually exceeded within the scheme.

It is considered that the overall quality of the facilities provided throughout the proposed scheme are appropriate, thus providing an enhanced standard of amenity for the future residents of the scheme. The development provides residents with the required level of amenity as outlined within the Guidelines.

*Table 3: Compliance with Specific Planning Policy Requirements.*

Specific Planning Policy Requirement	Compliance
<b>SPPR1</b> <i>(Housing Mix)</i>	In compliance with the requirements
<b>SPPR2</b> <i>(Minimum Apartment Floor Areas)</i>	In compliance with the requirements
<b>SPPR3</b> <i>(Dual Aspect)</i>	In compliance with the requirements
<b>SPPR4</b> <i>(Floor to Ceiling Height)</i>	In compliance with the requirements
<b>SPPR5</b> <i>(Lift and Stair Cores)</i>	In compliance with the requirements

## 1.5 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

Published in January 2024, the aim of these guidelines is to set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

In summary, key elements of the draft guidelines include:

- Change to density standards, based on geography and accessibility.
- Reduced garden sizes.
- Reduced separation distance from 22 metres to 16 metres.
- Reduced car parking standards.
- Increased bicycle parking standards.

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009, which in turn replaced the Residential Density Guidelines published in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations.

As stated within the guidelines *“there is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth”*.

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

### **SPPR 1 - Separation Distances:**

*“It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include objective(s) in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level.*

*When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.*

*Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

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

DOWNEY submit that the minimum separation distance of 16 metres has been exceeded between this proposed development and all neighbouring properties.

Indeed, such is considered to be one element of a design approach focused with ensuring the amenities of neighbouring residential areas and properties are not adversely affected nor degraded in any way by this subject proposal.

#### **SPPR 2 - Minimum Private Open Space Standards for Houses:**

*“Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2022 (and any subsequent updates). For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g., sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.”*

DOWNEY submit that the subject proposal has been designed in accordance with the provisions of the *Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025)* concerning private open space requirements. The minimum requirements of private open space are either met and /or exceeded by all of the apartments within the scheme.

For more information, the Local Authority are invited to refer to the HQA prepared by DOWNEY and submitted in conjunction with this planning application.

#### **SPPR 3 - Car Parking:**

*“It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 Table 3.1 and Table 3.2, car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, should be 1 no. space per dwelling. (ii) In accessible urban locations, defined in Chapter 3 Table 3.7, car parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, should be 1.5 no. spaces per dwelling. (iii) In intermediate and peripheral locations, defined in Chapter 3 Table 3.7, the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, should be 2 no. spaces per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision.”*

In line with SPPR 3 of the Guidelines, and in adherence to the provisions of the Dún Laoghaire Rathdown County Development Plan 2022-2028, a total of 54 no. parking spaces (3 no. universally accessible and 15 no. E.V connected) are proposed to serve 120 no. units as part of this subject proposal.

The proposed development is approximately a 10-minute walking distance (850 metres) of the Gallops LUAS stop which provides convenient public transportation for residents. There are also frequent bus services within walking distance of the subject site. In regard to SPPR 3 of the Guidelines the proposed development is within the High-Capacity Public Transport Node or Interchange on Table 3.8: Accessibility. This proximity encourages the use of public transport over private vehicles, thereby reducing the need for extensive parking spaces. The proposal also includes a new connection to Kilgobbin Road, which is designed to facilitate easy access for pedestrians and cyclists.

The reduced parking provision of 54 parking spaces and the provision of high quality cycle infrastructure supports the broader objective of promoting compact, walkable communities that minimise environmental impacts and encourage the use of alternative transport modes, aligning with SPPR 3 of the Sustainable Residential Development and Compact Settlements Guidelines. The Planning Authority are invited to refer to the report by NRB Consulting Engineers, which sets out a Residential Travel Plan, Parking Management Strategy and justification for the parking ratio as well as DMURS Statement.

#### **SPPR 4 - Cycle Parking and Storage:**

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:

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

The subject development seeks the provision of 273 no. bicycle parking spaces, of which 217 no. is to be stored internally within Block A and Block B in a safe and secure environment and including bike charging points, while a further 56 no. bicycle parking spaces are to be externally but safely located.

In turn, DOWNEY submit that the minimum standards for bicycle storage provision concerning residential development outlined within both local and national planning guidance have not just been adhered to in this instance, but also comfortably exceeded. It is noted that provision has also been made for bulky bikes, such as cargo bikes and a “bicycle doctor” is proposed so residents can readily carry out repairs to their bikes on site. This further encourages a modal shift away from private vehicles.

Furthermore, as outlined in **Policy & Objectives 5.1** of the Compact Settlement Guidelines:

*“It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.*

*Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*

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

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

The proposed development includes a total of 6,084 sq.m of public open space, throughout the site. This represents 49.9% of the gross developable site area, exceeding the requirements set out in both the Development Plan and the Compact Settlements Guidelines. We note, that 2,387 sq.m. (19.6 %) of public open space is located within the residential zoned part of the site.

A further 852 sq.m of communal open space is provided at ground level and at podium level for the enjoyment of the future residents.

This not only surpasses the relevant policies and requirements but also creates an active network of public and semi-private green spaces, which will significantly contribute to the promotion of green infrastructure, reinforcing the broader environmental and community objectives for Kilgobbin. For further details on the design of the open space, the Planning Authority are invited to refer to the plans and particulars submitted by Studio Glasu, which forms part of the application.

DOWNEY are of the considered opinion that the proposed development has been designed to be in line with these subject guidelines. As can be observed in particulars submitted with this application,

the new guidelines have had a significant impact on density, separation distances, bicycle parking provision and various other elements of this subject proposed application.

It should be noted that within criteria set out by Table 3.1 - Areas and Density Ranges – Dublin, Cork City and Suburbs, the subject site area would be most appropriately defined as an City - Urban Neighbourhood area in consideration of its urban location as well as the subject site constituting greenfield lands near the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied at City – Urban Neighbourhood locations of these areas.

Table 3.8 of the Guidelines sets out ‘*High Capacity Public Transport Node or Interchange*’ location as considered the most accessible, with the criteria for a sites inclusion within this location being within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop.

The subject site of this report is considered to be located within an accessible location, qualifying due to it being situated a mere 850 metres from the Gallops Luas Stop, thus a density of up to 250 dph can be proposed for development of a residential nature within this subject site. A net density of 98.4 dph is proposed in this instance.

The traffic and transport assessment prepared by NRB Consulting Engineers provides an assessment of the capacity of the Luas and bus services adjacent to the site, which determined that there is existing capacity in the current services for the anticipated demand created by the proposed development.

DOWNEY are of the considered opinion that the proposed development has been designed to be in a manner which ensures its compliance with both the development vision and various SPQR’s of the Guidelines, in turn, seeking permission for a development of sustainably high density in nature within a highly accessible and well-connected location.

## 1.6 Affordable Housing Act 2021 & Housing Circular 28/2021

In July 2021, the Affordable Housing Act 2021 was published, aiming to address problems associated with the high cost of housing for the portion of the population that do not qualify for social housing. Coming to effect from 3<sup>rd</sup> September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing affordable homes requirements to Part V. Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment.

The Part V units are dispersed throughout the development within both Block A and B. There is a total of 24 no. units (20%) being provided for the overall proposed development.

Table 6: Part V Provision

Block A and B					
	1 Bed	2 Bed (3 Person)	2 Bed (4 Person)	3 Bed	Total
Total	20	2	1	1	24

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing. For further details, please refer to the enclosed Part V drawings prepared by DOWNEY. It is noted that the applicant has engaged the Housing Section of Dún Laoghaire-Rathdown County Council prior to final planning application lodgement and a Letter of Validation has been obtained and submitted under separate cover with this application.

### 1.7 The Housing Agency Statement of Strategy 2022-2024

Launched in late January 2022, the Housing Agency's Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of The Housing Agency over 2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge.
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work *"to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities"*.

The Housing Agency's Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government's housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that the provision of 120 no. residential units on appropriately zoned land under the Dún Laoghaire-Rathdown Development Plan 2022-2028 would help utilise an existing capacity within the area of Kilgobbin and facilitate meeting the housing target for the area and the overall County. Therefore, it is considered that the proposed development is consistent with the foregoing Strategy in this regard.

## 1.8 Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018)

The ‘Urban Development and Building Heights, Guidelines for Planning Authorities’ are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These guidelines reinforce that *“a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development are not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels”*.

Section 1.10 of the Guidelines state *“the rationale (...) for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas”*. It continues, *“in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality”*.

Section 1.11 states *“these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations”*.

The Guidelines go on to state that *“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.”*

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

**Specific Planning Policy Requirement 1** – *“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the*

*objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height”.*

The proposed development at Kilgobbin Road is situated at a strategic location and is capable of supporting taller buildings and increased density. The site is excellently served by public transport, bus and rail with a proposed Bus Connects route designed to serve the site. Furthermore, the site has been identified within the local plans for the area as being suitable for increased density and height.

The proposed building heights are carefully designed to achieve an optimal density, in line with the Compact Guidelines, the Development Plan and through consultation with the Council. That said, it is submitted that the proposed height and density are meeting the requirements of SPPR 1.

**Specific Planning Policy Requirement 2** – *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities”.*

The proposed development seeks to provide for a residential development consisting of 120 units.

Additionally, the site is well-served by a range of existing educational, healthcare, and community facilities within its vicinity. Residents will also benefit from exceptional recreational and leisure amenities. In this regard, a Community and Social Infrastructure Audit has been prepared by DOWNEY and is enclosed with this LRD application. This audit provides a detailed overview and assessment of the existing social infrastructure and facilities in the area, ensuring that the proposed development aligns with relevant planning policies and adequately meets the needs of the community. We respectfully invite the Council to refer to the aforesaid report for further details.

**SPPR 3** – *“It is a specific planning policy requirement that, where;*

*(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*

*2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

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

The proposed development seeks to provide for a residential development. It is respectfully submitted that the following document outlines how the proposal is consistent with the relevant national, regional, and local planning policy as it pertains to the site and its environs. Such documents include architectural plans and elevations, architectural urban design statements, a non-statutory masterplan, DMURS statements, Traffic and Transport Assessment, AA Screening, bat surveys,

planning reports, engineering reports and daylight and shadow analysis, and as such the development accords with SPPR 3.

Section 3.2 of the Guidelines sets out development management principles and criteria that proposals for higher buildings are to be assessed against. The Development Management Principles are in accordance with and consistent with securing the objectives of the NPF and Dún Laoghaire-Rathdown County Development Plan. The Development Management Criteria are as follows:

Table 7: Development Management Standards.

Development Management Criteria in Section 3.2 of the Guidelines:	
At the scale of the relevant city/town	
Criteria of Guidelines	Evaluation and consistency of proposed development
<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 subject site is excellently served by public transport, particularly Dublin Bus and the proposed Bus Connects will further improve the public transportation offerings. The site is also within walking distance of the Gallops Luas stop offering further transportation connections to and from the city centre and beyond. The site is considered to be 'High Capacity Public Transport Node or Interchange' as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024). For further details on this, Dún Laoghaire-Rathdown County Council are invited to refer to the Traffic and Transport Assessment prepared by NRB Consulting Engineers.
<i>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 landscape architect.</i>	The proposed development includes building heights ranging in height from 4- 6-storeys. The proposed development outlines multiple strategies to ensure that there is no adverse impact on the surrounding character of the area.  The separation distance is maintained from the adjoining residential estates and other dwellings including Sandyford Hall Close, Sandyford Hall Drive, Kilgobbin House and Riverside Cottage in order to prevent potential impacts on the residential amenities of these properties in relation to overlooking, daylight and sunlight impact, overshadowing and overbearing.  The Protected Structures to the south of the site will be protected by the maintenance of the tree line along the southern boundary of the site. Studio Glasu Landscape Architecture prepared a Landscape Design Rationale for the proposed development, which is attached under separate cover.
<i>On larger 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</i>	The proposed development is designed to include new public spaces and a pedestrian/cyclist route which help to create a permeable, animated site and streetscape. The scheme will deliver a density of 98.4 units per hectare. As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights and the

<p><i>sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i></p>	<p>creation of generous separation distances between the taller elements of the scheme and neighbouring properties.</p> <p>It is considered that this approach successfully integrates the new development into the area, whilst clearly comprising a new and higher density form of development than the prevailing low-density housing, it will not give rise to significant amenity or visual impacts.</p>
<p><b>At the scale of the district/neighbourhood/street:</b></p>	
<p><i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i></p>	<p>The proposal seeks to strengthen connections to the surrounding area by providing a dedicated pedestrian and cycle route through the site. The increased building height contributes to a more robust urban design response on what is currently an underutilised site.</p> <p>This high-quality development is respectfully presented as a positive intervention within an urban context, with the potential to act as a catalyst for the regeneration of adjacent lands. The design responds sensitively to the surrounding built environment, with taller elements positioned further from the lower-rise residential properties along the site's northern and eastern boundaries, ensuring an appropriate transition in scale and massing.</p>
<p><i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered.</i></p>	<p>The proposed design incorporates a considered palette of materials that is sensitive to the overall development context, avoiding the appearance of monolithic blocks. The materials have been selected for their durability, ensuring a robust and long-lasting finish.</p> <p>The façade design embraces a modern and cohesive aesthetic, blending high-quality materials to create visual interest, durability, and a strong connection to the surrounding environment. Key materials include light brown brick and Portland limestone (or similar), providing a warm, natural tone. These are contrasted with dark grey cladding and aluminium capping, adding a sleek, contemporary touch and visual depth.</p> <p>Further information on material choice is enclosed within Section 6.5 of the Architectural Design Statement, prepared by DOWNEY which is submitted as part of this planning application.</p>

<p><i>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).</i></p>	<p>The proposed development will provide new publicly accessible open spaces that enhance the overall quality of the public realm. The introduction of these spaces, along with a dedicated pedestrian and cycle route through the site, will significantly contribute to the site's integration with its surroundings and promote greater connectivity.</p> <p>A Flood Risk Assessment has been prepared by Molony Millar Consulting Civil and Structural Engineers and is submitted under separate cover with the application. The assessment concluded that a section of the site is within Flood Zone A/B. The design team have worked extensively to ensure that there is no highly vulnerable development within this section of the site.</p>
<p><i>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.</i></p>	<p>The proposed development provides strong legibility through a clear and coherent layout, defined access points, and distinct architectural design. The subject site is a substantial size, located within the wider developed area of Kilgobbin and has remained vacant for many years. The legibility of the site and wider area is enhanced through this proposed development. The scheme provides for a new pedestrian and cyclist route through the site. This provides direct permeability through the site and aligns with Objective 81 of the Dún Laoghaire-Rathdown County Development Plan. The legibility of the site is further enhanced through the articulation of the building façades, variation in massing, and high-quality materials also contribute to visual clarity, helping residents and visitors easily navigate and understand the site, while reinforcing its identity within the urban context.</p>
<p><i>The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood.</i></p>	<p>The proposal will deliver a significant amount of new housing availability to the area, with a range of residential units that will serve various household types. The unit mix will include 1-, 2-, and 3-bedroom apartments which is deemed acceptable within the context of the area.</p>
<p><b>At the scale of the site/building</b></p>	
<p><i>The form, massing and height of the proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i></p>	<p>The development is designed to ensure that there will be no significant overshadowing or loss of daylight or sunlight to adjoining residential properties. Building heights, particularly those adjacent to existing housing to the north and east of the site, have been designed to minimise impact on access to sunlight or daylight on these properties through maintaining separation distances and stepping of the building heights.</p> <p>The enclosed Daylight &amp; Sunlight Report, prepared by Digital Dimensions provides further details in this regard. Furthermore, the development has also been designed to maximise daylight and sunlight access to the proposed residential units and amenity spaces within the development, through way of orientation and building mass.</p>

<p><i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2<sup>nd</sup> Edition) or BS 8206-2:2008 – 'Layout for Buildings – Part 2 Code of Practice for Daylighting'.</i></p>	<p>As set out in detail in the enclosed Daylight &amp; Sunlight Report, prepared by Digital Dimensions, the proposed development is assessed having regard to the BRE 'Site Layout Planning for Daylight and Sunlight' Requirements, which confirms that daylight and sunlight assessment undertaken, accords in full, with the methodology set out in the above referenced guidance. The proposed development provides high levels of daylight and sunlight throughout all the proposed apartments and does not adversely impact upon the surrounding developments. Further information on Daylight and Sunlight is addressed in the Daylight and Sunlight Report prepared by Digital Dimensions.</p>
<p><i>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</i></p>	<p>As noted above, the proposed development will provide appropriate levels of daylight and sunlight for both future residents and existing residents in the surrounding area and will not give rise to adverse overshadowing, as confirmed in the Daylight &amp; Sunlight Report prepared by Digital Dimensions.</p> <p>There is also adequate amounts of daylight and sunlight provided within the amenity spaces of the buildings, particularly the roof terrace within Block A and the two amenity terraces within Block B.</p> <p>Additionally Section 12.3.4.2 Habitable Rooms – Daylight/Sunlight Analysis of Section 3.1.3 of this report provides further, more detailed information on the daylight &amp; sunlight achieved in the scheme.</p>
<p><b>Specific Assessment</b></p>	
<p><i>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 microclimatic effects where taller buildings are clustered.</i></p>	<p>The proposed development, ranging from 4-6 storeys, is not of exceptional height and would not give rise to micro-climatic impacts.</p> <p>The proposed height of the development will not affect air navigation or result in any undue glare.</p>
<p><i>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/or collision.</i></p>	<p>Bat, Flora, Mammal surveys (forming part of the EclA) and an Appropriate Assessment Screening were carried out by Altermar Environmental Consultants as part of the application process.</p> <p>Bat activity was identified on the site along the southern treeline boundary and western boundary. The proposed development was designed to not have adverse impacts on the wildlife in the area by way of retaining the southern treeline and providing a sensitive lighting strategy to ensure bats foraging persist on site.</p>

	No mammals or flora of importance was identified on the site.
<i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i>	The report prepared by Independent Site Management Ltd. assesses the two wireless telecommunication channels that may be affected by the height and scale of this development. The report's assessment did not identify any Microwave Transmission links that were impacted by the height and scale of the development. Further information on this is provided within the Telecommunications Impact Assessment Report, attached under separate cover.
<i>An assessment that the proposal maintains safe air navigation.</i>	The maximum height of the proposed scheme is 6-storeys and the site is a considerable distance from the airport, which is confirmed following a review of Dún Laoghaire-Rathdown County Council's 2022-2028 Development Plan GIS Mapping system. Therefore, the development will maintain safe air navigation.
<i>An Urban Design Statement including as appropriate, impact on the historic building environment.</i>	An Urban Design Statement has been prepared by DOWNEY and submitted with the application. This is also supported by an Architectural Heritage Impact Assessment was prepared by Jason Bolton, as well as an Archaeological Impact Assessment, prepared by Courtney Deery, and are submitted as part of the final planning application. These set out the existing context of the site along with the rationale for the established design approach and assessment of receiving environment. The Council is invited to refer to these for further details.
<i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i>	A screening for Appropriate Assessment and Ecological Impact Assessment was undertaken by Altamar Environmental Consultants in respect of the proposal, and full detailed reports are enclosed with this planning application.

**Specific Planning Policy Requirement 4** – *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines.*
- 2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. Avoid monotype building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more”.*

The proposed development provides for a relatively high-density development of 120 no. units. It is respectfully submitted that the density proposed is in accordance with the national guidelines referred to in SPPR 4.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights and taller buildings are achievable. The proposed development steps in height from 4 to 6-storeys with cognisance given to existing built environment in the vicinity of the subject site and the provision of appropriate separation distances. The proposed development at Kilgobbin is situated on zoned lands and is very well served by public transport and therefore can be expected to achieve high density residential development. Allowing for some tall buildings will help to achieve this aim.

Table 8 – Compliance with Specific Planning Policy Requirements.

Specific Planning Policy Requirement	Compliance
SPPR1 (building height and density)	In compliance
SPPR2 (building height and mix of uses)	In compliance
SPPR3 (Assessment of planning applications)	In compliance
SPPR4 (development of greenfield/edge of city/town centre sites)	In compliance

### 1.10 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

*“In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”*

The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2018), which state that:

*“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme 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 for the area.”*

According to the apartment guidelines, *“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”*.

Excluding the 1-bedroom apartment units from the overall provision for 120 no. residential units, this leaves a total of 28 no. units that can be deemed to accommodate families and therefore may generate demand for childcare places. With respect to the foregoing and as per the following calculations, the proposed scheme would require a childcare of 7 childcare places.

$$(28 \div 75) \times 20 = 7 \text{ childcare places}$$

DOWNEY submit that a childcare facility will not be necessary on this site. For further information, Dún Laoghaire-Rathdown County Council is invited to refer to the Childcare Demand Assessment, which is submitted alongside this planning application, enclosed under separate cover.

As also shown within the accompanying Community and Social Infrastructure Audit, and as calculated using Census 2022 data, a total of 16 no. childcare facilities are located within a 1-kilometre radius of the subject site, with 848 places at present. The subject development is calculated in the accompanying Community and Social Infrastructure Audit to generate an estimated 4 no. children potentially needing childcare facilities. 3 no. children being within the 0-4 age group (pre-school), and 1 no. children being within the 5+ age cohort (after-school).

Therefore, DOWNEY is of the considered opinion that due to the large number of childcare facilities within the area, the demographic profile and future demand from permitted developments within the area, not providing a childcare facility within the development is justified.

In light of the above, it is submitted that the proposed development is consistent with the Childcare Facilities Guidelines. For further details and information in this regard, please refer to the Community and Social Infrastructure Audit report and the Childcare Demand Assessment prepared by DOWNEY under a separate cover.

### **1.11 Smarter Travel: A Sustainable Transport Future**

In summary, ‘Smarter Travel: A Sustainable Transport Future’ states that *“to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.”*

The five key goals of this transport policy are as follows:

- Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.
- Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.

- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.
- Reduce overall travel demand and commuting distances travelled by the private car.
- Improve security of energy supply by reducing dependency on imported fossil fuels.

It is considered that the proposed development complies with Smarter Travel: A Sustainable Transport Future. The proposed development provides housing and is in close proximity to the green line LUAS, providing accessible transport to central Dublin. The proposed development also proposes a dedicated pedestrian and cycle route through the site, connecting Belmarine Vale to Kilgobbin Road, helping to support and promote a modal shift to sustainable transportation.

In light of the above, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation. The proposed development also provides considerable secure bicycle parking for future residents and visitors to again encourage use of sustainable modes of transportation. This can also be noted within the scheme with an enhanced permeability and connectivity to adjoining sites. It is evident that the proposed scheme aims to facilitate and support the use of sustainable transport, particularly by facilitating connectivity within the lands.

Therefore, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation. Please refer to the enclosed Traffic and Transport Assessment prepared by NRB Consulting Engineers for further details in this regard.

### 1.12 Design Manual for Urban Roads and Streets (DMURS)

The '*Design Manual for Urban Roads and Streets*' (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The report prepared by NRB Consultant Engineers provide further details in respect of the compliance of the proposed development with the provision of DMURS.

### 1.13 Cycle Design Manual (2023)

The '*Cycle Design Manual*' 2023 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users, including cyclists. It offers guidance on integrating cycling infrastructure in the design of urban areas.

- The Manual gives guidance on the design requirements for cycle lanes, cycle parking infrastructure as well as safety and comfort.

It is submitted that connections in the proposed development have been addressed by provision of high standard and prioritised cycle infrastructure within the immediate local area, and it is also important to note that priority to pedestrian and cycle movements have been integral to the overall design and master planning of the subject lands. Please refer to the enclosed reports, drawings and documentation prepared by NRB Consultant Engineers. The proposed development complies with DMURS, has an adequate quantum of bicycle parking proposed, as well as a cycle network connecting

the surrounding lands through the site, thus further supporting sustainable transport and permeability.

### **1.14 EIA Directive**

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project.

The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations. The proposed development is a sub-threshold development and does not necessitate an EIAR as part of this application.

### **1.15 Bird and Habitats Directive - AA Screening & Natura Impact Statement**

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Altamar Environmental Consultants Ltd. have prepared the necessary Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development at Clondalkin to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use. The AA Screening, prepared by Altamar, notes that there is no requirement to undertake an NIS.

### **1.16 The Planning System and Flood Risk Guidelines (2009)**

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered, and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a Site-Specific Flood Risk Assessment.

In accordance with these Guidelines, a Flood Risk Assessment has been prepared by Molony Millar Consulting Civil and Structural Engineers and submitted under separate cover of this application. This assessment confirms that the north, eastern site boundary falls within a Flood Zone A/B. With full implementation of proposed flood mitigation strategies, there will remain a low residual risk of fluvial flooding on the subject site which can be managed to acceptable levels.

The northern edge of the site will provide car parking (low vulnerable development) within this part of the site, due to the proximity of the area to the Ballyogan Stream, and the lack of a definitive flood level, there is a moderate chance of roadway flooding during this extreme fluvial flooding event. The site requires a Justification Test, which has been carried out as part of the final planning application and is believed to have all the criteria to safely proceed with the proposed development.

Groundwater flooding on the proposed site is not considered to be an issue, as there is no basement proposed, and construction will be relatively shallow. The pluvial flood risk will be minimised by implementing SUDs features including permeable paving, green blue roofs and stormwater attenuation storage within the site and also due to the floor finish levels being generally 150mm above the adjacent ground levels.

The development as proposed is considered to comply with the requirements of the Justification Test as per The Planning System & Flood Risk Management Guidelines. The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere.

Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the enclosed Flood Risk Assessment prepared by Molony Millar Consulting Civil and Structural Engineers.

The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed such as SuDs design, attenuation ponds, overland flood routing, appropriate floor levels, and regular inspections. We note that prior to lodging the application, the design team engaged with the Water Services of the Council and agreement was reached in relation to the drainage and surface water design approach. A SUDS Audit has also been prepared by RPS Consulting Engineers and is submitted under separate cover as part of this application.

### **1.17 All-Ireland Pollinator Plan 2021-2025**

The All-Ireland Pollinator Plan is a shared plan of action which is to bring about a landscape where pollinators can flourish over 2021-2025. To achieve this, the Plan sets out six objectives: (1) Making farmland pollinator friendly, (2) Making public land pollinator friendly, (3) Making private land pollinator friendly, (4) All-Ireland Honeybee Strategy, (5) Conserving rare pollinators, and (6) Strategic coordination of the Plan.

With respect to the aforementioned, the proposed development has taken into consideration the All-Ireland Pollinator Plan along with the Pollinator-friendly Planting Code, all considered in detail as part of the specific plant section of trees, shrub, hedging and herbaceous species. A diverse range has been chosen, along with a high percentage of native species in order to provide for pollinators from early spring through to late autumn. Please refer to the Landscape Masterplan prepared by Studio Glasu Landscape Architects for further details on inclusion of the Plan guidelines within the proposed landscape of the scheme.

## 1.18 National Adaptation Framework: Planning for a Climate Resilient Ireland

In accordance with the ‘Climate Action and Low Carbon Development Act 2015’, this National Adaptation Framework (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making. The ‘Built Environment and Spatial Planning’ section within this Framework recognises that, *“climate change considerations need to be taken into account as a matter of course in planning-related decision-making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built environment”*. Furthermore, *“effective planning reduces vulnerability to the negative effects of climate change by integrating climate considerations into decision making in order to avoid inappropriate forms of development in vulnerable areas and promoting compact development in less vulnerable areas”*. It is important to mention that this Framework envisions ‘flood resilience’ and ‘access to wildlife and green space’ as no-regret benefits of effective adaptation which would continue to be worthwhile regardless of future climate scenarios. As such, the proposed development has taken into consideration the context of the site and it can be noted that an assessment of Flood Risk has been prepared by Molony Millar Consulting Civil and Structural Engineers, with appropriate mitigation measures proposed such as SuDs design, attenuation ponds, overland flood routing, etc. Thus, the proposed development with access to high-quality green communal space and introduction of best practice energy efficiency measures as required to meet the Energy Strategy and Building Regulations and promoting a compact urban form for ‘less vulnerable areas’ is consistent with this national framework.

## 1.19 Climate Action Plan 2024

Climate Action Plan 2024 is the third annual update to Ireland’s Climate Action Plan 2019 and the second to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. The Climate Action Plan 2024 builds on the introduction of carbon budgets and sectoral emissions ceilings in Climate Action Plan 2023 and sets a course for Ireland’s targets to halve emissions by 2030 and reach net-zero no later than 2050.

This updated plan recognizes the increasing urgency of climate action and aligns with Ireland's enhanced commitments under the European Green Deal and international climate agreements. The Plan comprehensively identifies the challenges and opportunities across key sectors, including Electricity, Transport, Built Environment, Industry, and Agriculture. It sets out a pathway to achieve legally binding carbon budgets and sectoral emissions ceilings, targeting a 51% reduction in greenhouse gas emissions by 2030 and net zero by 2050. Key governance measures are strengthened, including a reinforced role for the Climate Change Advisory Council, transparent reporting mechanisms to the Oireachtas, and a focus on carbon-proofing policies at all levels.

The Plan emphasizes the role of the built environment, which remains a significant source of emissions, accounting for 12.3% of Ireland's greenhouse gases in 2022. To address this, the Plan prioritises improving energy efficiency through:

- Accelerated retrofitting to achieve deep retrofits for 75,000 homes annually.
- Expansion of district heating networks.
- Transition from fossil-fuel heating systems to renewable alternatives, such as heat pumps.
- Implementation of near Zero Energy Building (nZEB) standards for all new developments.

Incorporating climate resilience, the Plan outlines measures to improve building fabric, optimize solar gains, and enhance ventilation while reducing thermal bridging. The adoption of renewable energy systems, high-performance materials, and sustainable construction methods ensures both carbon reduction and improved living standards. These measures make buildings more comfortable, healthier, and more cost-effective to heat.

The Climate Action Plan 2024 also focuses on enhancing electric vehicle (EV) infrastructure, with expanded on-street charging options and dedicated facilities in new developments to support the transition to low-emission transport.

Through these measures, the Plan underscores the leadership role of the Government, public bodies, and communities in delivering transformative action. It reaffirms Ireland's commitment to a sustainable and equitable transition to a low-carbon future, ensuring resilience and prosperity for all.

The scheme has been designed to allow all the dwellings to achieve nZEB status, meaning they will need a very low amount of energy, which will be fuelled mainly by renewable energy sources. Measures adopted include optimised siting for solar gains and optimised window sizes for daylighting, a high amount of insulation to floors, walls and roofs and careful detailing to limit thermal bridging. The use of high-performance windows and doors, careful airtightness detailing, and a designed ventilation system will limit heat loss and ensure thermal comfort. As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan. The Planning Authority are invited to refer to the report by RM Breen, which is submitted under separate cover for further details.

## 2.0 REGIONAL PLANNING POLICY

### 2.1 Regional Spatial and Economic Strategy 2019-2031

The 'Regional Spatial and Economic Strategy' (RSES) published by the Eastern and Midland Regional Authority outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures, and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of land, resources, environment, and infrastructure capacity.

The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin City and Suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives (RPOs) that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

**Regional Policy Objective (RPO) 3.2** – *“Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”*

**Regional Policy Objective (RPO) 4.2** – *“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”*

**Regional Policy Objective (RPO) 4.8** – *“Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth targets of 30% of all new homes to be built within the existing built-up urban area.”*

The proposed development is fully aligned with the objectives and policies outlined in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. It supports Regional Policy Objective (RPO) 3.2, which promotes compact urban development by locating at least 50% of new homes within or adjacent to the built-up area of Dublin. As noted, the development is situated within an existing urban area, making efficient use of a brownfield site, and thus contributing to compact growth and regeneration.

## 3.0 LOCAL PLANNING POLICY

### 3.1 Dún Laoghaire Rathdown Development Plan (2022-2028)

The subject site is located within the functional area of Dún Laoghaire Rathdown County Council. The development of the site is therefore informed by the policies and objectives of the Dún Laoghaire Rathdown County Development Plan 2022-2028.

#### 3.1.1 Land Use Zoning

Under the Dún Laoghaire Rathdown County Development Plan 2022-2028, the subject site is under two different zoning designations, Objective A and Objective F. As illustrated in the image below, the central and eastern sections of the site are zoned Objective ‘A’, the zoning vision objective for which is states as *“to provide residential development and improve residential amenity while protecting the existing residential amenities”*, while the rest of the site is zoned under Objective ‘F’, the zoning vision objective for which is states as *“to preserve and provide for open space with ancillary active recreational amenities”*.

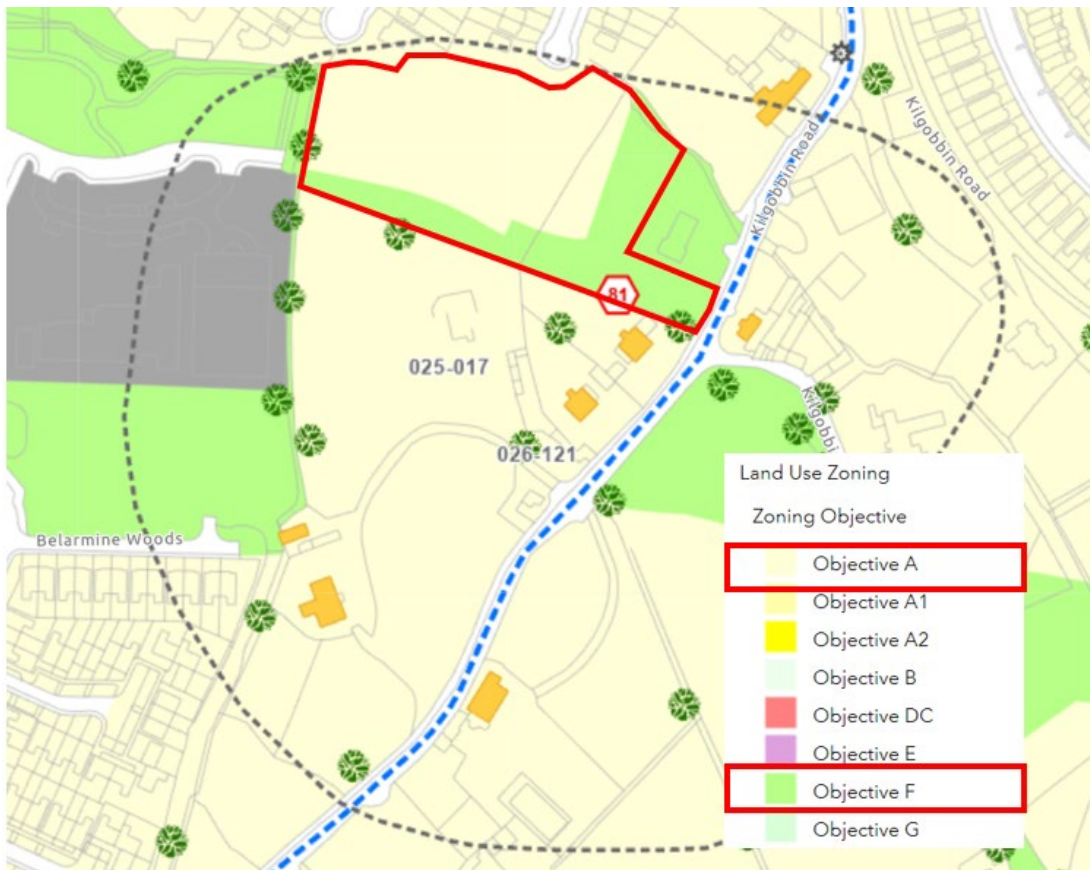


Figure 15. Land Use Zoning Map Extracted from the Development Plan (application site outlined in red).

Under the subject zoning designations, the following uses are permitted in principle.

Table 9. Permitted Uses under the MRE Land Use Zoning.

Uses Permitted in Principle Under Objective A Land Use Zoning
Assisted Living Accommodation, Community Facility, Childcare Service, Education, Open Space, Public Services, <b>Residential</b> , Residential Institution

Table 10. Permitted Uses under the Objective F Land Use Zoning.

Uses Permitted in Principle Under Objective F Land Use Zoning
Community Facility, Cultural Use, <b>Open Space</b> , Sports Facility, Travellers Accommodation.

The site is also located within a 'Record of Monuments and Places' area and a Specific Local Objective 81, which seeks: "to ensure the provision of a combined pedestrian footpath/cycleway connection between Belarmine and Kilgobbin Road to improve overall local permeability and to facilitate direct access from new residential communities to the Luas Line B1 public transport corridor." The proposed development has incorporated this connection into the design of the overall project.

There are trees noted for protection adjacent to the subject site boundaries. The identified trees shall be retained with some pruning and trimming proposed.

DOWNEY submit that as illustrated within drawings submitted with this planning statement, residential development is proposed within lands zoned under Objective A, with no proposed residential development taking place on lands zoned Objective F, nor are any residential units to be placed in areas of the site considered to be under flood risk as of the current Development Plan.

### 3.1.2 Ballyogan and Environs 2019-2025.

The proposed development is located just outside of the Ballyogan LAP. However, Dún Laoghaire-Rathdown County Council requested that the applicant refers to Figure 4.11 and Table 4.6.

Therefore, the following policy is of relevance to the subject site:

**Policy BELAP MOV12 – New Linkages:** *“To provide or facilitate the delivery of the new linkages shown in Table 4.6 and Figure 4.11 – Movement Strategy”*

In Figure 4.11 link no. 2 is the pedestrian and cycle link of Kilgobbin Road to Enniskerry Road. This link would connect Kilgobbin Road to the existing Greenway in Stepside North. The proposed development is helping to achieve a link through the site, connecting Kilgobbin Road with Belarmine Vale.

### 3.1.3 Development Management Standards

Chapter 12 of Dún Laoghaire-Rathdown County Development Plan 2022-2028 sets out the development management standards for development within the county. As such, the following policies and objectives are obtained according to the subject proposal:

#### 12.1.1.1 Pre-Planning Consultation

Under the provisions of Section 247 of the Planning Act, 2000, as amended, a prospective applicant shall have consulted with the Planning Authority in respect of the development that comprises:

- 10+ residential units
- All other developments 1,000 sq. m. +

**APPLICANT RESPONSE:** On the 6<sup>th</sup> March 2025, DOWNEY, on behalf of the applicant, lodged a Pre-Planning request to Dún Laoghaire-Rathdown County Council, for a proposal of 120 no. apartments on the subject site. DOWNEY received feedback, via written correspondence, from Dún Laoghaire-Rathdown County Council’s Planning Department PAC/LRD2/001/25 in relation to the proposal, which the design team have taken on board for the current proposal being submitted.

It is also noted that offline discussions were held via email and phone calls between members of the design team and the internal departments of Dún Laoghaire-Rathdown County Council, such as roads and water services, to agree on details prior to the lodgement of the subject application.

#### 12.1.1.2 Design Statement

A Design Statement, which is an outline of the proposal’s context and aims, and how it responds to the Development Plan objectives and surroundings, should be submitted for all applications of 1000+sq.m. commercial development or applications of 30+ residential units.

## APPLICANT RESPONSE:

DOWNEY have prepared a design statement to accompany the subject application, which the Council are invited to refer to, submitted under separate cover of the application.

### 12.1.2.2 Appropriate Assessment

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

- The Plan or Project will not give rise to significant adverse direct, indirect, or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects).
- The Plan or Project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type and/or a priority species) but there are no alternative solutions, and the Plan or Project must nevertheless be carried out for imperative reasons of overriding public interest – including those of a social or economic nature.
- The Plan or Project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the Plan or Project must nevertheless be carried out for imperative reasons for overriding public interest - restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

**APPLICANT RESPONSE:** Altamar have prepared an AA screening to accompany the subject application. The proposed development is located 5 km from the nearest Natura 2000 site (Wicklow Mountains SAC) and has no direct hydrological connection to any European site. While there is an indirect hydrological pathway via surface water to marine sites, standard drainage and wastewater treatment measures ensure no significant impact on conservation objectives or qualifying interests. No specific mitigation is required, and no nearby projects are expected to have in-combination effects on Natura 2000 sites. As such, there is no requirement for a Natura Impact Statement to be prepared. Dún Laoghaire-Rathdown County Council are invited to refer to the AA screening prepared by Altamar and submitted under separate cover of the subject application.

### 12.3.2.4 Childcare Facilities

**Policy Objective PHP6** addresses the provision of childcare facilities within Dún Laoghaire Rathdown:

*“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”.*

*“Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage”.*

DOWNEY submits that the omission of an on-site childcare facility within this proposed development is justified, based on the findings of a Childcare Demand Assessment. This assessment evaluates existing childcare provision in the surrounding area and demonstrates that there is sufficient capacity within nearby facilities to accommodate the additional demand likely to arise from the proposed residential units.

The subject development, when considering two and three bedroom units, is submitted to be under the 75 unit threshold for provision of new childcare facilities advocated for by the Childcare Facilities – Guidelines for Planning Authorities, which constitutes national guidance on the matter for Local Authorities.

The childcare assessment identified 16 no. childcare facilities within the catchment area with a capacity of 848 no. pre-school and 368 no. after school places (1,216 spaces in total). Furthermore, 4 no. childcare facilities have also been approved as part of residential developments within the catchment area with an estimated capacity of 464 no. places to serve the future developments. The anticipated childcare demand generated by the permitted developments is 210 no. children, leaving a surplus of 254 no. places.

Based on the methodology applied, the proposed development would generate a demand for 3 no. pre-school childcare spaces and 1 no. afterschool spaces for children of primary school age (i.e. 4 no. total).

In light of the foregoing, DOWNEY are of the considered opinion that the proposed development is in accordance with the proper planning and sustainable development of the area and that there is generally sufficient capacity of childcare facilities in the surrounding area to cater for the demand generated the proposed development. It is therefore considered that the proposed development is consistent with the policies and objectives of the Development Plan.

### **12.3.3.1 Residential Size and Mix**

*“Objective PHP27: 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.”*

Planning applications received for 50+ residential units either individually or cumulatively 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 mix that reflects existing and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/or within the County. New residential communities shall ensure an appropriate mix including a proportion of larger units.

New Guidelines were published on the 8<sup>th</sup> July 2025, Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025, which supersede these Dún Laoghaire-Rathdown Development Plan Objectives. These guidelines state that *“there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments.”*

**APPLICANT RESPONSE:** The proposed development seeks to provide a total of 120 no. units as follows: 67 no. 1-bedroom units (56% of total), 25 no. 2-bedroom units (21% of total), 17 no. 2-bedroom units (14% of total) and 11 no. -bedroom unit (9% of total). It is respectfully submitted that the proposed unit mix is deemed acceptable and compliant with the requirements of the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025). The provision of 3 bedroom apartment units has been reduced to help provide for an increased demand of 1 and 2 bed apartments as outlined in the new guidelines.

### Height

The Dún Laoghaire Rathdown Development Plan 2022-2028 is clear in its support for increased building height in all urban contexts, subject to ensuring the highest standards of urban design, architectural quality and place-making outcomes.

**Policy Objective PHP42: Building Design & Height** states that:

- *“It is a Policy Objective to: Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”*

**Table 11: Compliance with Table 5.1 Appendix 5, Dún Laoghaire-Rathdown County Development Plan 2022-2028.**

<b>Criteria for All Such Proposals</b>	<b>Proposed Development’s Compliance</b>
<b>1. At County Level</b>	
<i>a. Proposal assists in securing objectives of the NPF in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.</i>	<p>The proposed density of 98.4dph would help to create a significant increase in accommodation within the area of Kilgobbin, helping to focus development within this Urban Neighbourhood (one of the key urban neighbourhoods of the NPF).</p> <p>The proposed development aims to address the following NPF Policy Objectives; nos. 7, 20, 37, 43 and 45.</p> <p>The proposed development is located on an underutilised green field site within Kilgobbin, a large suburban town within south Dublin, helping to provide compact development within the urban footprint of a key urban centre of Dublin.</p>
<i>b. Site must be well served by public transport – 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 – with high capacity, frequent</i>	<p>The site is located within a highly connected location, just off Kilgobbin Road and Ballyogan Road and the M50 motorway linking the area to the City Centre by car.</p> <p>Bus stops in the immediate area are served regularly by bus routes including the 44, 47 and 118. The site is also located</p>

<p><i>service and good links to other modes of public transport.</i></p>	<p>within an 850-metre walking distance of the Gallops LUAS Stop, connecting it to the wider area of Dublin.</p>
<p><i>c. Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</i></p>	<p>The proposal seeks to strengthen connections to the surrounding area by providing a dedicated pedestrian and cycle route through the site. The increased building height contributes to a more robust urban design response on what is currently an underutilised site.</p> <p>This high-quality development is respectfully presented as a positive intervention within an urban context, with the potential to act as a catalyst for the regeneration of adjacent lands. The design responds sensitively to the surrounding built environment, with taller elements positioned further from the lower-rise residential properties along the site's northern and eastern boundaries, ensuring an appropriate transition in scale and massing. The legibility of the site is aided through the articulation of the building façades, variation in massing, and high-quality materials also contribute to visual clarity, helping residents and visitors easily navigate and understand the site, while reinforcing its identity within the urban context.</p>
<p><i>d. Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.</i></p>	<p>The Protected Structures that are close to the subject site are Kilgobbin Castle ruins, Castle Lodge, Oldtown House and Thornberry Kilgobbin. In response to these protected structures, the design team has carefully and strategically developed the proposal to ensure sensitivity to the surrounding heritage. This is achieved through maintaining the existing treeline along the southern boundary, adequate separation distances and stepping of building heights. Digital Dimensions prepared CGIs and verified views of the proposed development which provide more detailed information regarding the future views created by the proposed development. The Architectural Heritage Impact Assessment and Archaeological Impact Assessment reports that are submitted as part of the application, confirm that the proposed development will not adversely impact any protected views or Kilgobbin Castle.</p>
<p><i>e. Infrastructural carrying capacity of area as set out in Core strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</i></p>	<p>The proposed development is supported by various Assessments, Audits and reports which provide detail on the infrastructural carrying capacity of the area surrounding the site. These assessments are all attached under separate cover, alongside the planning application.</p> <p>The Community and Social Infrastructure Audit, prepared by DOWNEY, establishes the availability of social and community infrastructure in the area.</p> <p>Traffic and Transport Assessment, prepared by NRB Consulting Engineers, Engineering Report, prepared by Molony Millar Consultants and the Confirmation of Feasibility</p>

	from Uisce Eireann, all provide clarification of water supply and transport for the subject site.
<b>2. At District/Neighbourhood/Street Level</b>	
<i>a. Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</i>	The proposal responds to the overall natural and built environment by providing permeability to the surrounding sites and by providing public open space located at the entrance to the site via Kilgobbin Road. This contributes to an attractive and inviting entrance to the site, enhancing the vibrancy and liveliness of the surrounding streetscape. The DMURS Quality Audit, prepared by NRB Consulting Engineers, provides further details on the positive contributions to the built environment.
<i>b. Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</i>	The proposed design was expertly designed to ensure no monolithic, uninterrupted walls are present within the design. The Design Statement prepared by DOWNEY, submitted in support of the development outlines specific design material choices.
<i>c. Proposal must show use of high quality, well considered materials.</i>	The Design Statement prepared by DOWNEY, submitted in support of the development outlines specific design material choices within the proposed development. The façade features a modern, cohesive design using high-quality materials like light brown brick, limestone, and dark grey cladding. Glass balustrades and large aluminium-framed windows enhance light and openness, while varied textures and tones create visual interest and a strong connection to the surroundings.
<i>d. Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</i>	The proposed development will provide new publicly accessible open spaces that enhance the overall quality of the public realm. The introduction of these spaces, along with a dedicated pedestrian and cycle route through the site, will significantly contribute to the site's integration with its surroundings and promote greater connectivity.
<i>e. Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.</i>	The legibility of the site is aided through the articulation of the building façades, variation in massing, and high-quality materials also contribute to visual clarity, helping residents and visitors easily navigate and understand the site, while reinforcing its identity within the urban context. The provision of the new link between Belarmine and Kilgobbin Road will also greatly assist in terms of legibility.
<i>f. Proposal must positively contribute to the mix of uses and/or building/dwelling typologies available in the area.</i>	The development is also providing 1 bed, 2 bed and 3 bed units to help provide a diverse mix of apartment types that will cater for a range of demographics and housing needs.
<i>g. Proposal should provide an appropriate level of enclosure of streets or spaces.</i>	The stepping of building heights, particularly the transition from five to six storeys, ensures a respectful relationship with neighbouring buildings while maintaining a clear sense of enclosure. Internally, the landscaped communal courtyard is

	framed by the buildings, offering a well-defined, sheltered and overlooked shared space that enhances security, usability, and social interaction. The Landscape Design Rationale provides further detail on the design and layouts of these enclosed and accessible spaces.
h. <i>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</i>	The public and communal spaces within the development are designed to create a cohesive and interconnected layout, seamlessly combining the open areas through a thoughtfully designed landscape and a network of connective paths. This integrated approach introduces a variety of programmed elements along the pathways, fostering a natural flow that enhances activity, interaction, and the overall usability of the space. The Landscape Design Rationale provides further detail on public and communal open spaces for the proposed development.
i. <i>Proposal must make a positive contribution to the character and identity of the neighbourhood.</i>	This is ensured through the public open space provided at the entrance of the site, cycle/walk way provided through the site, complementary material choice and massing for the proposed development. These design choices help to integrate the development into the area.
j. <i>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</i>	Careful design considerations were made in order to ensure the development respects the surrounding character of the area, including adequate separation distances, building orientation, building massing, open space provision and overall building design.
<b>3. At Site/Building Scale</b>	
a. <i>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</i>	The massing and height are designed to achieve high density, but with a variety in scale and form to respect and respond to the scale of adjoining existing dwellings, developments and open spaces, while creating visual interest in the streetscape. Impacts on surrounding properties is provided in the following part of this table; 3b. Dún Laoghaire-Rathdown County Council is also invited to refer to the Daylight & Sunlight Assessment, prepared by Digital Dimensions.
b. <i>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2<sup>nd</sup> Edition).</i>  <i>Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.</i>	In terms of impact on adjoining properties/spaces, all windows assessed exceed the target values set out for annual and winter probable sunlight hours. The proposed development meets the recommendations of the BRE guidelines (2022), and any potential loss of sunlight will be negligible. There is further information provided within the Daylight & Sunlight Assessment, prepared by Digital Dimensions. And Section 12.3.4.2 Habitable Rooms – Daylight/Sunlight Analysis of Section 3.1.3 of this report.
c. <i>Proposal should ensure no significant adverse impact on adjoining properties by</i>	The separation distances and overall massing provided from the surrounding residential developments ensure no

<i>way of overlooking, overbearing and/or overshadowing.</i>	overlooking and/or overshadowing on these properties. Further details are provided within Daylight & Sunlight Assessment, prepared by Digital Dimensions.
<i>d. Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</i>	The proposed development is not in the vicinity of an Architectural Conservation Area (ACA). Several Protected Structures are located in proximity to the subject site, including the ruins of Kilgobbin Castle, Castle Lodge, Oldtown House, and Thornberry Kilgobbin. In consideration of these heritage assets, the design team has approached the development with care and deliberate design strategy to ensure it responds appropriately to the historic context. The proposed scheme has been sensitively designed to respect the character and setting of these nearby protected structures and designated conservation areas. This has been achieved by retaining the existing treeline along the southern boundary, incorporating appropriate separation distances, and introducing a stepped building height strategy.
<i>e. Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development.</i>	The scheme has been designed to allow all the dwellings to achieve nZEB status, meaning they will need a very low amount of energy, which will be fuelled mainly by renewable energy sources. Measures adopted include optimised siting for solar gains and optimised window sizes for daylighting, a high amount of insulation to floors, walls and roofs and careful detailing to limit thermal bridging. The Planning Authority are invited to refer to the report for RM Breen for further details.
<b>4. County Specific Criteria</b>	
<i>a. Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.</i>	N/A - The proposal is not along the coast.
<i>b. Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.</i>	The proposed development provides a Landscape Design Rationale and verified views, displaying how the scheme proposes a maximum of 6 storeys and how the proposed development interacts with the surrounding areas.

<p>c. <i>Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage).</i></p>	<p>The planning application provides all of the necessary assessments and reports that are required for the application to be fully assessed and as requested during the pre-planning consultation phase.</p>
<p>d. <i>Specific assessments such as assessment of microclimatic impacts such as down draft.</i></p>	<p>The planning application provides all of the necessary assessments and reports that are required for the application to be fully assessed and as requested during the pre-planning consultation phase.</p>
<p>e. <i>Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</i></p>	<p>Altamar prepared a Bat survey within the Ecological Impact Assessment Report, attached under separate cover in support of the application. There is a presence of bats foraging in the existing trees along the southern edge of the site. However, no roosts were detected. In order to protect these bats and flight lines these trees are being retained and safeguarded within the proposed development, while lights are not being proposed under the trees.</p>
<p>f. <i>Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</i></p>	<p>The report prepared by Independent Site Management Ltd. assesses the two wireless telecommunication channels that may be affected by the height and scale of this development. The report's assessment did not identify any Microwave Transmission links that were impacted by the height and scale of the development. Further information on this is provided within the Telecommunications Impact Assessment Report, attached under separate cover.</p>
<p>g. <i>An assessment that the proposal maintains safe air navigation.</i></p>	<p>The proposed development is not within the range of the Dublin Airport or other airports and is at a maximum of 6 storeys which is not dissimilar to other apartments that are in close proximity to the site. It will maintain safe air navigation.</p>
<p>h. <i>Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</i></p>	<p>The proposed project is not within or proximate to a designated Natura 2000 site. The nearest European site to the proposed development is 5.0 km away (Wicklow Mountains SAC). There is no direct hydrological connection to any European Site. There is an indirect hydrological pathway to marine-based European sites via surface water drainage. Further information regarding the ecology of the site is addressed within the Ecological Impact Assessment and Appropriate Assessment Screening prepared by Altamar.</p> <p><b><u>Tree Removal and Protection</u></b></p> <p>It should be noted that as of the current Dún Laoghaire Rathdown County Development Plan there is a Local Objective to protect and preserve Trees and Woodlands as indicated in the figure below. The design has been carefully considered to protect existing trees and where it may encroach on a root protection zone, a "no-dig" approach has been recommended. Further details are outlined in the landscape plans, prepared by Studio Glasu Landscape Architecture and the Arboricultural</p>


	<p>Report, prepared by John Morris, attached under separate cover alongside the planning application.</p>  <p><b>Figure 16. Map Illustrating Local Objectives as per the Dún Laoghaire Rathdown Development Plan 2022-2028.</b></p>
i. Additional criteria for larger redevelopment sites with taller buildings.	N/A
j. Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.	<p>The proposed development is designed to include new public spaces and a pedestrian/cyclist route which help to create a permeable, animated site and streetscape. The scheme will deliver a net density of 98.4 units per hectare. As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties.</p> <p>It is considered that this approach successfully integrates the new development into the area, whilst clearly comprising a new and higher density form of development than the prevailing low-density housing, it will not give rise to significant amenity or visual impacts.</p>
k. For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.	Digital Dimensions prepared a Daylight & Sunlight Assessment for the proposed development which provides details on how the development adequately meets the daylight and sunlight requirements throughout the development.



Figure 17. Block A Elevations



Figure 18. Block B Elevations

DOWNEY submit that the subject proposed height of 4-6 storeys is most appropriate, in turn, leading to the creation of a development of a compact and high-density nature as advocated for by the current development plan as well as national planning guidance while ensuring that the residential amenities of neighbouring properties are not to be degraded in any negative way.

### 12.3.3.2 Residential Density

The Dún Laoghaire County Development Plan outlines that it is an aim of the Local Authority during the lifetime of this plan to incentivise and permit development of higher densities within appropriately located areas, citing that the achievement of higher densities ensures the efficient use of land and promotes compact consolidated development of underutilised sites in line with national and regional planning policy. The following policies and objectives would be relevant to the density of a residential development upon the subject site:

- **4.3.1.1 Policy Objective PHP18 - Residential Density:**

*“Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to*

*proximity and accessibility considerations, and development management criteria set out in Chapter 12.*

*Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”*

• **4.3.1.3 Policy Objective PHP20: Protection of Existing Residential Amenity:**

*“It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.”*

As noted previously Section 12.3.3.2 of the current Dún Laoghaire Rathdown Development Plan outlines the following with regard to density:

*“In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document:*

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

*As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport.”*

**APPLICANT RESPONSE:** In consideration of these provisions of the current Development Plan and national policy presiding over the subject site including the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, the subject development proposes an overall density of 98.4 dph and net density of 167.8dph within the site. The application addresses Objectives PHP18 and PHP20, as outlined above, through the considered and detailed design of the overall proposal. The use of stepped building heights, appropriate façade articulation, high-quality materials, and generous separation distances ensures that the existing low-rise dwellings surrounding the site are respected and not adversely impacted.

In regard to the 2024 Compact Settlement Guidelines, 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 at ‘City – Urban Neighbourhoods’ locations of these areas.

Table 3.8 of the Guidelines sets out ‘High Capacity Public Transport Node or Interchange’ location as considered the most accessible, with the criteria for a sites inclusion within this location being within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop. The subject site of this report is considered to be

located within an accessible location, qualifying due to it being situated 850 metres from the Gallops Luas Stop.

In terms of previously granted planning applications on the site there were 43 no. units granted on the site under Reg. Ref. D18A/0074. This planning application proposes an increased number of units on the site, justified by its central location, excellent access to public transport, and the site's capacity to accommodate this density due to the carefully considered design of the development — including material choices, separation distances, and stepped building heights.

DOWNEY are of the considered opinion that the proposed development has been designed to be in a manner which ensures its compliance with both the development vision and various SPPR's of the Guidelines, in turn, seeking permission for a development of sustainably high density in nature within a highly accessible and well-connected location, in turn contributing towards the pressing need for increased housing supply and housing choice in Dublin 18 and the wider Dún Laoghaire Rathdown administrative area.

### 12.3.5.3 Internal Storage and External Storage

Internal storage standards for apartments shall accord with, or exceed the figures outlined below:

#### Internal Storage

Studio apartment (1 person)	3 sq. m.
1-bedroom apartment (2 persons)	3 sq. m.
2-bedroom apartment (3 persons)	5 sq. m.
2-bedroom apartment (4 persons)	6 sq. m.
3-bedroom apartment (4 persons)	6 sq. m.
3-bedroom apartment (5 persons)	9 sq. m.

Each apartment within the proposed development either meets or exceeds the requirements for internal storage. The overall provision of external bulky storage for the 2 no. buildings is 52.2 sqm., with the following breakdown:

Block A: 14.6 sqm. provided on ground floor and 9.6 sqm. provided between Floors 1, 2 and 3 (overall 24.2 sqm.)

Block B: 28 sqm. provided on ground floor.

Therefore, the proposed development complies with both internal and external storage provisions by exceeding or meeting the minimum storage requirements within apartments.

### 12.4 Transport

In relation to connectivity and movement, the Development Plan stresses the need for development to take place in locations that are adequately serviced by public transport infrastructure. Policy Objective T1: Integration of Land Use and Transport Policies highlights the importance of ensuring land use and zoning are aligned in a manner which ensures sustainable development in a manner which supports the modal shift:

*“It is a Policy Objective to actively support sustainable modes of transport and ensure that land use and zoning are aligned with the provision and development of high-quality public transport systems.”*

The Plan notes that the integration of new housing, employment and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations is a key priority and consideration for development going forward into the future with section 12.3.3.2 of the County Development Plan noting *“As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport.”*

In effect, the Development Plan supports higher density of development at locations judged to be well connected to public transport infrastructure, such as this development proposes.

The proposed development is committed to maintaining and sustainably integrating the site boundary with Kilgobbin Road, in line with Section 5.8 of the County Development Plan 2022–2028, which identifies the retention of Kilgobbin Road between Ballyogan Road and Kilgobbin Lane as a ‘long-term objective’ in preserving its character as an attractive ‘country’ road. This development achieves compatible integration through sensitive and considered design, ensuring that the rural character of Kilgobbin Road is respected and enhanced.

It is submitted that as detailed previously within this planning statement, the subject site boasts exceptional accessibility by means of public transport, most notably with regard to the Gallops Luas Station being located within 850 metres of the subject site, offering consistent and reliable high frequency light rail services from to as far south as Brides Glenn and as far north as Broombridge and Cabra.

Dún Laoghaire Rathdown County Council is invited to refer to the Traffic and Transport Assessment prepared by NRB Consulting Engineers, in support of this planning application, submitted under separate cover.

#### **12.3.4.2 Habitable Rooms – Daylight/Sunlight Analysis**

A daylight analysis is required for all proposed developments of 50+ units. A Daylight and Sunlight Assessment has been carried out by Digital Dimensions. The report aims to assess the daylight in neighbouring buildings, sunlight to amenity in neighbouring properties, daylight and sunlight within the proposed development and sunlight to amenity within the proposed development.

**Daylight and sunlight in adjacent properties:** There are 6 no. dwellings within the zone of influence for daylight from the proposed development. The results of the Daylight & Sunlight Report show that the reduction to daylight and sunlight to adjacent properties and their communal and private amenity spaces are negligible.

The results show the following for Daylight that majority of the windows retain a VSC in excess of 27% or are not reduced below 80% of the existing VSC value and any potential loss of daylight light will be minimal. Two windows of No.17 Sandyford Hall Close ID 4 & 6 are noting a minor reduction in VSC, but these windows serve dual aspect rooms. When the area weighted calculation for VSC is

considered, daylight to these rooms is above 80% of its former value and meets the recommendations of the BRE guidelines. Any reduction in available daylight from the proposed development will be negligible to minor and meets the recommendations of the BRE guidelines BR209:2022 (third edition).

The results show the following for daylight: All windows assessed exceed the target values set out for annual and winter probable sunlight hours. The proposed development meets the recommendations of the BRE guidelines (2022) and any potential loss of daylight will be negligible.

***Sunlight to amenity in neighbouring properties:*** All the private amenity space to the surrounding properties were assessed for sunlight in accordance with the recommendations set out in BR209:2022. On the 21st March, all the amenity spaces will retain 2 hours sunlight over 50% of the area or will not be reduced below 80% of the existing levels. The proposed development meets the recommendations of the BRE guidelines (2022).

***Daylight and sunlight within the proposed development:*** The results indicate a high level of daylight provision, with 97.4% of rooms achieving Minimum Illuminance and 96.7% achieving Target Illuminance. The rooms will be bright and pleasant spaces. This scheme is well designed for sunlight, with 80.8% (97 no.) of units meeting the minimum recommended 1.5 direct sunlight hours to a living space. This is in line with the BRE guideline example for an apartment layout where 4 in 5 achieves the target sunlight hours.

***Daylight and sunlight to amenity within the proposed development:***

There are a number of amenity spaces at ground level. The ground level amenity of Block A and Block B fall short of the area receiving 2 hours sunlight on 21<sup>st</sup> March. This is due to their enclosed courtyard nature and northern orientation. These areas provide hard and soft landscaping features, suitable privacy screening to ground floor units as well as a playground, which receives 2 hours of sunlight. The communal amenity spaces are supplemented by 3,952sq.m of public open space including a public playground. However, the area weighed average of all the communal amenity spaces meets the BRE criteria of 2 hours sunlight on the 21<sup>st</sup> March over in excess of 50% of the area. There is also a large communal terrace at roof level in Block A and a communal terrace in Block B which meets the same BRE criteria. The public and communal amenity spaces achieve 2 hours sunlight on the 21<sup>st</sup> March over in excess of 50% of the area. The proposed development meets the recommendations of the BRE guidelines (2022).

#### **12.4.5.1 Parking Zones**

The current Dún Laoghaire Rathdown County Development Plan 2022 – 2028 outlines four distinct parking zones to ensure adequate residential parking, while also aiming to reduce car dependency where appropriate.

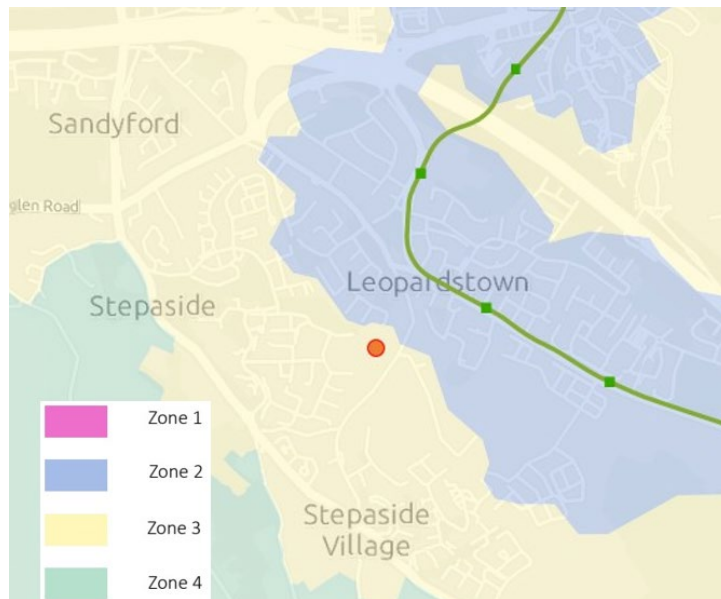


Figure 19. Parking Zone Map Extracted from the Development Plan (subject site highlighted in red).

As per the current Dún Laoghaire Rathdown Development Plan, the subject site is considered to be within Zone 3 of its Parking Zone Map.

Table 12. Maximum Parking Standards for Development of Residential Land Use as per the Dún Laoghaire Rathdown County Development Plan 2022-2028 (Extract from 12.5, modified by DOWNEY)

Land Use		Zone 1 MTC Areas and Blackrock	Zone 2 Near Public Transport	Zone 3 Remainder of County (non-rural)	Zone 4 Rural
	Criterion	Maximum	Standard	Standard	Standard
<b>Apartments and Sheltered Housing:</b>					
<b>Apt 1 bed</b>	unit	1	1	1*	Case by Case
<b>Apt 2 bed</b>	unit	1	1	1*	Case by Case
<b>Apt 3 bed +</b>	unit	1	2	2*	Case by Case

\*plus 1 in 10 visitor parking for apartments in zone 3

**APPLICANTS RESPONSE:** The subject proposals provision of 54 no. parking spaces for the 120-no. proposed residential units is considered appropriate.

The subject number of parking spaces is reduced in comparison to maximum parking standards for residential development outlined within the current development due to the subject site's proximity to the existing high-quality and high-frequency public transport services as well as reasons outlined within the following paragraphs.

To justify the reduction in car parking provision to 54 no. parking spaces for the proposed 120 no. units, the development must demonstrate compliance with the assessment criteria outlined in Table 12.5 and 12.4.5.2 of the DLRCC Development Plan 2022-2028. A detailed response is outlined below:

**Proximity to public transport services:** In regard to the SPPR 3, the proposed site is rated in Table 3.8 of the Guidelines as 'High Capacity Public Transport Node or Interchange' location which is considered

the most accessible, with the criteria for a sites inclusion within this location being within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange. The subject qualifies under this criteria due to it being situated a mere 850 metres from the Gallops Luas Stop. DOWNEY note that due to the site's proximity to numerous existing public transport options the site allows for car parking provision standards to be minimised, substantially reduced or eliminated in certain circumstances.

**Walking and Cycling Accessibility/Permeability:** The proposed development also delivers pedestrian and cycle connections to Kilgobbin Road, helping to improve permeability for all pedestrians and cyclists including those associated with the proposed development. The development is proposed to have a dedicated pedestrian and cycle route through the site connecting Belarmine Vale to Kilgobbin Road as per Specific Local Objective 81 of the DLRCC County Development Plan 2022-2028.

**The need to safeguard investment in sustainable transport and encourage a modal shift:** The reduction of parking spaces aligns with the Council's objectives to promote sustainable transport options and reduce reliance on cars. Furthermore, enhanced by the provision of high quality bicycle parking infrastructure of 273 no. bicycle parking spaces.

**Availability of car sharing and bike / e-bike sharing facilities:** The development incorporates shared mobility solutions and electric vehicle charging points to further reduce the need for private car ownership.

**Existing availability of parking and its potential for dual use:** On-street parking in the vicinity is subject to controlled parking zones, limiting long-term parking. Car parking spaces will not be sold with units, but are leased and managed by the management company for the overall development, thus allowing a level of dual use.

**The particular nature, scale and characteristics of the proposed development:** Situated in a highly accessible location with strong public and sustainable transport links, the development's scale and design justify a reduced car parking provision, in line with the Council's commitment to promoting sustainable development. The proposed development also includes an enhanced provision of bicycle parking, establishing a strong baseline for bicycle storage. This is intended to encourage cycling as a more primary mode of transport in the area, thereby supporting a reduced car parking provision.

**Range of service available within the area:** The reduction in car parking spaces is also further justified by the services in the area. DOWNEY submit, along with this LRD planning application a detailed Community and Social Audit which provides detailed information on the provision of the wide range of services within a 1km radius of the site. These services include a wide supply of education, childcare, healthcare, and retail facilities within a 1km radius (approx. 15-minute walk) of the subject site, along with a variety of recreational and sports facilities. This provision of services in close proximity to the site allows for residents to be within walking distance of all their necessary needs.

**Impact on traffic safety and the amenities of the area:** The Traffic and Transport Assessment prepared by NRB Consulting Engineers indicates that the existing road network can accommodate the expected traffic generated by the development without any adverse effects on congestion or safety.

**Capacity of the surrounding road network:** The Traffic and Transport Assessment Report outlines that the surrounding road network has sufficient capacity to accommodate the expected traffic generated by the development, and the reduction in parking spaces will not adversely affect traffic flow or congestion. The Council is invited to refer to the Traffic and Transport Assessment Report, prepared by NRB Consulting Engineers for further information.

**Urban design, regeneration and civic benefits including street vibrancy:** Reducing car parking provision facilitates more efficient land use, creating opportunities for high-quality public spaces and contributing to improved urban design and a more vibrant, people-focused environment.

**Robustness of Mobility Management Plan to support the development:** A comprehensive Working Mobility Management Plan will be implemented to promote sustainable transport options among residents, including initiatives to encourage walking, cycling, and the use of public transport. The Council is invited to refer to the Traffic and Transport Assessment Report, prepared by NRB Consulting Engineers for further information.

**The availability of on street parking controls in the immediate vicinity:** The area is subject to controlled parking zones, limiting long-term on-street parking, which will ensure that there is no overspill parking from the proposed development to any of the surrounding areas.

**Conclusion:** Therefore, it is considered that the proposed development is consistent with the aforementioned standards set out within the Dún Laoghaire Rathdown Development Plan as well as the vision of the Local Authority to reduce car dependency.

#### 12.4.6 Cycle Parking

The importance of adequate provision of bicycle parking for new development is emphasised throughout the Dún Laoghaire Rathdown County Development Plan 2022-2028 with Table 14.17 outlining minimum bicycle parking standards for developments.

Section 12.4.6 of the Development specifically addresses the provision of new bicycle parking within new developments noting:

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

The following table outlines bicycle parking standards outlined within the ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’ (2018) referred to within the subject County Development Plan.

*Table 13. Minimum Bicycle Parking Standards for Development of Residential Land Use as per the ‘Standards for Cycle Parking and Associated Cycling Facilities for New Developments’ (2018).*

Residential Development type	1 short stay (visitor) parking space per: (Minimum of 2 spaces)	1 long stay parking space per: (Minimum of 2 spaces)
Apartments, Flats, Sheltered housing	5 units	1 unit
Houses - 2 bed dwelling	5 units	1 unit
Houses - 3+ bed dwelling	5 units	1 unit
Sheltered housing	5 units	1 unit
Student Accommodation	5 bedrooms	2 bedrooms

In consideration of 120 no. apartment units being proposed (67 no. 1 bedroom, 25 no. 2 bedroom (3 Person), 17 no. 2 bedroom (4 Person) and 11 no. 3 bedroom units) a total of 273 no. bicycle parking spaces are proposed within the development.

As illustrated in Table 13, visitor parking spaces are to be proposed at a ratio of 1 per 5 units and resident parking spaces are to be proposed at a rate of 1 per unit, therefore a minimum of 144 spaces should be provided for the subject development.

Considering 120 no. apartment units are to be provided as part of this development (24 no. visitor, 120 residential), the subject proposal exceeds this requirement quite comfortably, proposing 273 no. units in total (56 no. visitor and 217 no. residential spaces being proposed).

As such, the quantum needed for the residents of the proposed development is fully covered and the overall scheme encourages the use of other transportation methods as per pertaining policies and guidelines. As such, it is considered that the provision is sufficient and consistent with the County Development Plan.

Please refer to the 'Section 7 Bicycle Parking Design', contained within the Architectural Design Statement prepared by DOWNEY.

#### 12.3.5.1 Dual Aspect

SPPR 4 of the Apartment Guidelines outlines that proposed developments located in 'suburban or intermediate locations' requires a minimum of 50% of apartments to be dual aspect. The new 'Planning Design Standards for Apartments, Guidelines for Planning Authorities, 2025' require a reduced rate of 25% of apartment within a development to be dual aspect. The proposed development provides 53% of the apartments to be dual aspect which comfortably exceeds the minimum requirements in the new guidelines and complies with the SPPR 4 of the previous Apartment Guidelines and the Dun Laoghaire-Rathdown Development Plan 2022-2028.

### 12.8.3 Open Space Quantity for Residential Development

#### 12.8.3.1 Public Open Space

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

Figure 20: Minimum Private Open Space requirements outlined in the Dún Laoghaire Rathdown County Development Plan 2022-2028.

All residential schemes must provide a minimum provision of public open space in accordance with the table above, which has regard to the content of the Section 28 Guidelines ‘Sustainable Residential Development in Urban Areas’ (2009).

#### APPLICANTS RESPONSE:

##### Quantitative Assessment:

The Sustainable Residential and Compact Settlement Guidelines for Planning Authorities (2024) have superseded the abovementioned Guidelines, with Policy Objective 5.1 of the Guidelines requiring 10-15% of the site to be open space.

The subject site is 1.21 ha. in size and seeks to provide a total of 6,084 sq. m. of public open space. This equates to 49.9% of the total site area, therefore comfortably exceeding the minimum requirement of 15% public open space. 2,386.6 sqm (19.72% of the site) of the public open space is being provided within Zone Objective A on the site, while the remaining public open space being provided within Zone Objective F. This is in compliance with the Opinion issued by Dun Laoghaire-Rathdown County Council as the proposed development is providing an excess of the required amount of public open space on Zone Objective A of the site. The remaining 3,698 sqm. of public open space is largely to the eastern part of the site, where there is a proposed natural play area and retention basin.

In order for the space to qualify as public open space “the area must be designed and located to be publicly accessible and useable by all in the County; generally free from attenuation measures; and capable of being taken in charge (i.e. must accord with the Council policy on taking in charge of open spaces).”

### Qualitative Assessment:

The design of the proposed development complies with the Dun Laoghaire-Rathdown Development Plan and provides public open space within accessible portions of the site within Zone Objective A. Approximately 2,367 sq.m. of public open space is located within the Objective A zoned part of the site. Furthermore, additional public open space is provided throughout the remainder of the subject site. The required public open space does not have attenuation measures within it, and it is primarily for the public and residents to enjoy. The public open space located within Zone Objective F has an attenuation pond located within it. Further information is provided within the Landscape Design Rationale Report prepared by Studio Glasu Landscape Architecture, attached under separate cover.

There has also been a significant reduction in the amount of hardstanding within the scheme, following the Section 32B pre-planning meeting with Dun Laoghaire County Council. There has been a significant increase in the amount of green space within the scheme to combat the amount level of hardstanding.

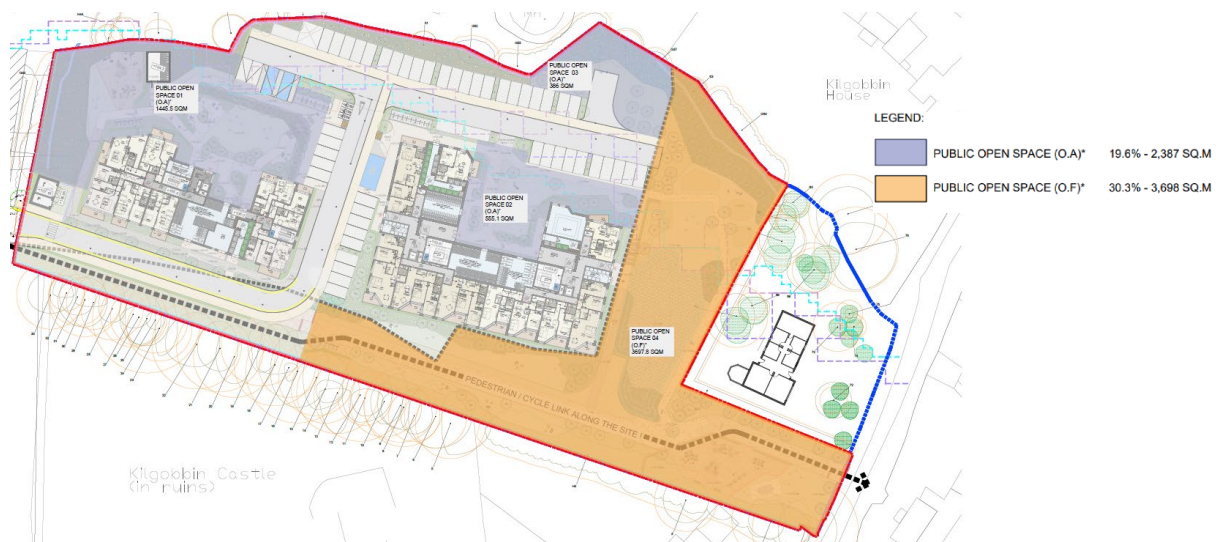


Figure 21: Public Open Space provision within the proposed development.

### 12.8.3.2 Communal Open Space

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

Figure 22: Minimum Communal Open Space requirements outlined in the Dún Laoghaire Rathdown County Development Plan 2022-2028.

In addition to Public Open Space, provided by the applicant, communal open space must also be provided for apartments and in some instances for houses, in accordance with the minimum standards set out in Figure 21 above in accordance with the standards in the 'Sustainable Urban Housing, Design Standards for New Apartments' Section 28 Guidelines, (2020).

## APPLICANTS RESPONSE:

### Quantitative Assessment:

The subject site proposes 120 no. apartments and seeks to provide a total of 852 sq. m. of communal open space. This equates to 7% of the total site area and as such is considered acceptable as the minimum required amount is 703 sq. m., which the scheme comfortably exceeds.

### Qualitative Assessment:

*"Communal open space is for the exclusive use of the residents of the development and should be accessible, secure, and usable outdoor space which is inclusive and suitable for use by those with young children and for less mobile older persons. Whilst an element of roof garden may be acceptable, the full quantum of communal open space should not take the form of being solely roof gardens"*

The communal open space strategy for Blocks A and B emphasizes accessibility, usability, and visual quality, creating a well-balanced relationship between shared spaces, private areas, and the surrounding environment. At Block A, the communal area includes a fully accessible entrance with a gently sloped pathway. Additional stepped access routes provide alternative entry points, thoughtfully integrated into the existing landscape. The space is thoughtfully designed with a range of features that enhance both functionality and visual appeal. A dedicated seating area, surrounded by a rich mix of planting offering a welcoming and comfortable setting for residents to relax and socialise.

Block B's communal open space is organised around a central amenity lawn, carefully designed with a clear network of pathways that provide intuitive access to building entrances. Subtle mounding, layered herbaceous planting, and varied seating options enhance the space, creating a welcoming and visually engaging environment for residents and visitors alike. The communal open space will be managed with a management company.

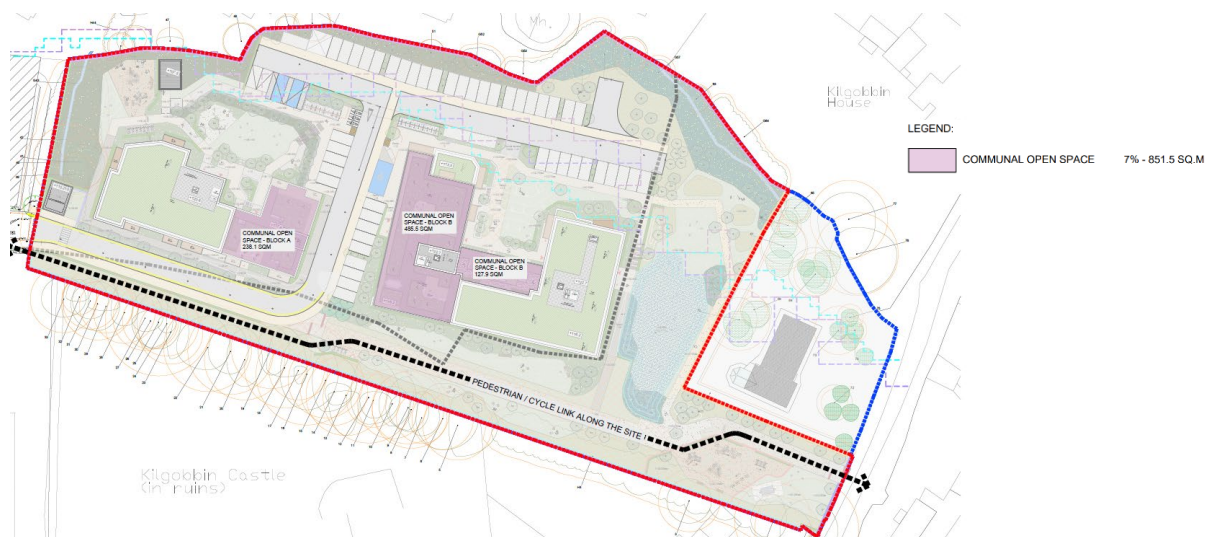


Figure 23: Communal Open Space provision within the proposed development.

### 12.8.3.3 Private Open Space

Section 12.8.3.3 of the Dún Laoghaire Rathdown County Development Plan 2022-2028 outlines the private open space minimum requirements for apartments.

Type/No. of bedrooms	Minimum square metres
Studio	4 sq. m.
One	5 sq. m.
Two (3 persons)	6 sq. m.
Two (4 persons)	7 sq. m.
Three	9 sq. m.
Four +	12 sq. m.

Figure 24: Minimum Private Open Space requirements outlined in the Dún Laoghaire Rathdown County Development Plan 2022-2028.

#### APPLICANTS RESPONSE:

##### Quantitative Assessment:

The proposed development provides each apartment with the required amount of private open space, in accordance with the amounts outlined in figure 22 above. Specific details of this provision can be found within the HQA, prepared by DOWNEY.

##### Qualitative Assessment:

*“Every apartment shall have private amenity space in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Private amenity space should be located to optimise solar orientation and designed to minimise overshadowing and overlooking.”*

Private open spaces will be provided in the form of balconies for each apartment and provide safe and private space for the future residents to enjoy. The design team ensure that there is no overshadowing or overlooking created by the balconies on other parts of the building and on surrounding developments.

### 12.8.7.1 Separation Distances:

As per the Development Plan, ‘a minimum clearance distance of circa 22 metres, in general, is required between opposing windows.’ This guidance from the Development Plan has been superseded since by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities which prescribes a reduced minimum separation distance of circa. 16 metres. The proposed development exceeds this requirement and provides for circa. 30 metres separation distance between the Block A and House No.17 on Sandyford Hall Drive; approximately 28 metres

between Block B and House No.14 on Sandyford Hall Close; and approximately 29 metres between Block B and the existing dwelling named 'Riverside Cottage' located towards the eastern site boundary.

### 12.10.1 Flood Risk Management

Section 12.10 of the current County Development Plan notes that any proposal must have regard to Appendix 15 Strategic Flood Risk Assessment, *'the Planning System and Flood Risk Management' Guidelines for Planning Authorities' DEHLG (2009) and DECLG Circular PL2/2014'* and that the *'Flood Zone maps accompanying this Plan and Appendix 15 should be consulted at Pre-Planning stage and/or prior to lodgement of planning applications.'*

**APPLICANTS RESPONSE:** Regarding flood risk, it has been a key design consideration that portions of the site are located within or bordering Flood Zone A and Flood Zone B as noted in the Flood Zone Maps contained within the Dún Laoghaire Rathdown Development Plan 2022-2028 and that a watercourse (Ballyogan Stream) runs through the subject site at various points. It is proposed that all built structures be located beyond the AEP 0.1% (1 in 100 year) flood extents of the Ballyogan Stream. No basement level is proposed.

The Site Specific Flood Risk Assessment (SSFRA), prepared by Molony Millar Consulting Engineers, notes that the proposed development:

- *Will not increase the flood risk elsewhere, and will likely reduce the residual flood risk elsewhere, due to the provision of compensatory flood storage volume within the site boundary.*
- *Includes measures to minimise flood risk to people, property, the economy and the environment. The proposed finished floor levels of the development vary between +105.4m OD Malin (west of site) and 103.3m OD Malin (east of site), approximately 0.65m above the fluvial flood level of the Ballyogan Stream at the north-eastern corner of the site and that all built structures will be located beyond the AEP 0.1% (1 in 100 year) flood extents of the Ballyogan Stream.*
- *Will have a low residual risk of fluvial flooding which can be managed to acceptable levels. This includes an operational flood risk strategy consisting of regular surveillance and maintenance regime to minimise the risk of blockages occurring in the proposed drainage systems.*
- *Is compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes with design in accordance with the Design Manual for Urban Roads and Streets (DMURS) and with the implementation of sustainable Urban Drainage Systems (SUDS) features.*

Tidal flooding will not be considered as part of the SSFRA as the site is located 5.3km from the nearest coastline. The pluvial flood risk is minimised by implementing SUDS features including permeable paving, blue/green roofs and stormwater attenuation storage within the site, and also due to the finish floor levels being generally 150mm above the adjacent ground levels. In some localised areas, where

The SSFRA includes a Justification Test which has been carried out as the proposal is considered Highly Vulnerable Development in Flood Zones A/B. The Justification Test indicates that all the criteria have been adequately satisfied to safely proceed with the proposed development.

The map displays the flood risk for Cherrywood, with Flood Zone A (dark blue) and Flood Zone B (light blue) areas highlighted. The River Dodder is shown flowing through the area. The map includes a legend with the following items:

- Pluvial - Surface Water
- Pluvial - Surface Water
- Pluvial - Foul
- Flood Zone A
- Flood Zone B
- Wave Overtopping
- County Boundary
- Boundary of Adopted Cherrywood Planning Scheme

The map also shows surrounding areas like Belarmine and various roads.

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Figure 26. Site photo illustrating Ballyogan Stream watercourse present within subject site.

## 6.0 ENVIRONMENTAL CONSIDERATIONS

Any proposed development has to be cognisant of whether the development is in proximity to any defined Special Area of Conservation, Special Protection Area or Proposed Natural Heritage Area.

An Appropriate Assessment (AA) is required under the Habitats Directive 92/43/EEC, Article 6(3) and Article 6(4) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites where it is identified that a proposed plan or project could have significant impact on a Natura 2000 site.

While the subject site is in the vicinity of a Protected Structure there is no Special Area of Conservation, Special Protection Area or Proposed Natural Heritage Area on the land itself.

Protected structures that are close to the subject site are Kilgobbin Castle ruins, Castle Lodge, Oldtown House and Thornberry Kilgobbin. In response to these protected structures, the design team has carefully and strategically developed the proposal to ensure sensitivity to the surrounding heritage. The proposed development has been thoughtfully planned to respect the character and setting of these nearby protected structures and areas of conservation. The subject site is also located 1.4km southeast of the Fitzsimons Woods, which is classified as a proposed Natura Heritage Area.

It should also be noted that an Ecological Impact Assessment was submitted with the latest application on site (Reg. Ref. D18A/0074) in which the potential ecological impacts of the development proposal on local wildlife were assessed.

No hydrological connection, nor pathway between the site and any Natura 2000 habitat was located within 15km of the site. It was therefore deemed that the proposed development would not have any

significant effects on any Natura 2000 sites and the proposal was not required to proceed with a Stage 2 Appropriate Assessment.

DOWNEY submits that the appropriate assessment required from an ecological perspective will be submitted with the subject application. A bat survey has been carried out by Altermar and confirmed that no bat roosts are located within the subject site, and this will be included within the application.

## 7.0 CONCLUSION

This planning report and statement of consistency has been prepared in support of the proposal to develop a Large-Scale Residential Development at Kilgobbin Road, Stepside, County Dublin. The proposed development provides for:

*“Permission is sought by Kilgobbin Apartment Limited, for a Large-Scale Residential Development on lands at Riverside Cottage, Kilgobbin Road, Stepside, Dublin 18. The proposed Large-Scale Residential Development (LRD) will provide 120 no. apartment units within 2 no. blocks ranging in height from 4- to 6-storeys. The development will consist of; Block A, consisting of 44 no. units (27 no. 1 bed (2-person), 13 no. 2 bed (3-persons), 1 no. 2 bed (4-persons) and 3 no. 3 bed (5-persons) of 4- to 5-storeys height and roof terrace; Block B, consisting of 76 no. units (40 no. 1 bed (2-persons), 12 no. 2 bed (3-persons), 16 no. 2 bed (4-persons) and 8 no. 3 bed (4-persons) and be 5- to 6-storeys height. All units will be provided with terraces/balconies.*

*The proposed development will provide all associated public open space and play area, 54 no. car parking spaces including accessible parking and Electric Vehicle parking, 273 no. bicycle parking spaces, 3 no. motorcycle parking spaces, bin/waste store, bulky goods stores and plant room at ground floor levels, 1 no. detached ESB substation and 1 no. detached bicycle store. The proposed development will also provide for all associated site development and infrastructural works including foul and surface water drainage, roads, footpaths, landscaping, boundary treatment, public lighting and a pedestrian and cycling pathway connecting Belarmine Vale and Kilgobbin Road. Vehicular access to the development will be from Belarmine Vale.”*

The proposed development will provide a high-quality development, with an appropriate mix of units and an acceptable density of development proposed catering to a range of people at varying stages of life and responding to existing need in the area.

The proposed development is in accordance with the land use zoning and local planning policy pertaining to the subject site. The subject site is suitably located within an existing built-up area and is well served by existing public transport, notwithstanding public transport improvements such as BusConnects, as well as other commercial, recreational, and other local services and amenities for future residents.

The proposed scheme under this application will still provide for an appropriate and sustainable density of development within this location. The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Government policy and guidance.

The subject site, in consideration of its highly strategic and accessible location, represents an opportunity for the sustainable development of a vacant and underutilised land within the Dublin 18 area.

The subject proposal, it is submitted, would constitute the type and scale of development envisioned for areas considered to be under the zoning objectives of the subject site, with development of a residential nature proposed to take place in an appropriate location with extensive present and future public transport links which is currently underutilised as is a key aim of both the Local Authority and national planning guidance at present.

It is submitted that the proposed development is appropriately designed and scaled having regard for the site's setting. Concerning height and scale, as illustrated in the plans and particulars submitted with this request, the development has been scaled in a manner whereby the amenities of neighbouring residential development are not adversely affected in any way, with no degradation of privacy nor overlooking arising from this subject development.

The proposed development therefore will aid the Local Authority in achieving its vision of compact urban form and growth within more appropriate and accessible locations through the revitalisation of under used and underdeveloped sites.

Indeed, the proposed development is in accordance with the land use zoning and local planning policy pertaining to the subject site outlined within the Dún Laoghaire Rathdown County Development Plan, which seeks to promote high quality development of a residential nature within areas benefitting from the appropriate zoning designation.

The subject site it is submitted, despite its highly strategic and accessible location, currently represents an area of vacant and currently underutilised land.

The proposed development will aid the Local Authority in achieving its vision of compact urban form and growth within more appropriate and accessible locations through the revitalisation of under used and underdeveloped sites.

The proposed development contributes towards the pressing need for increased housing supply and housing choice within Dublin 18 and the wider Dún Laoghaire Rathdown administrative area.

It is therefore respectfully submitted by DOWNEY, on behalf of our client, Kilgobbin Apartment Limited, that Dún Laoghaire Rathdown County Council grant permission for this application.