



PLANNING STATEMENT OF CONSISTENCY & PLANNING REPORT

KNOCKRABO PHASE 2 SHD
PROPOSED STRATEGIC HOUSING DEVELOPMENT
AT MOUNT ANVILLE ROAD, DUBLIN 14



PREPARED FOR:
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1.0 INTRODUCTION

On behalf of the prospective applicant, Knockrabo Investments DAC¹, this Planning Statement of Consistency and Planning Report has been prepared to accompany a proposed planning application in relation to a proposed strategic housing development at a site located at Knockrabo Phase 2, Mount Anville Road, Dublin 14, which measures c. 1.78 hectare.

This statement is made in accordance with Section 5 (5) (b) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and has been prepared in accordance with the requirements of the Planning and Regulations 2001 (as amended by Planning and Development (Strategic Housing Development) Regulations 2017) and the 'Strategic Housing Development Pre-Application Consultation - Guidance for Prospective Applicants' issued by An Bord Pleanála.

This report also includes details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history and compliance with the development plan policies. The development has been the subject of a pre-application meeting with the Planning Authority, in compliance with Section 5 (2) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

1.1 Proposed Development Description (as per Statutory Notices)

Knockrabo Investments DAC intend to apply to An Bord Pleanála for permission for a Strategic Housing Development with a total application site area of c. 1.78 ha, on a site located at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

The proposed development relates to Phase 2 of the development on the 'Knockrabo' lands. Phase 1 of 'Knockrabo' was granted under Dún Laoghaire-Rathdown County Council (DLRCC) Reg. Ref. D13A/0689/An Bord Pleanála (ABP) Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units.

The proposed development will consist of the amendment of the permitted 'Phase 2' residential development of 93 no. units, childcare facility and community/leisure uses (DLRCC Reg. Ref. D17A/1124) on a site of 2.75ha. The proposed development will provide for the reconfiguration and redesign of the approved residential development. The Knockrabo Way entrance road (constructed and unconstructed), the renovation of Cedar Mount House including childcare facility and community/leisure uses, the Coach House, Gate Lodge (West), the Gate House and all associated landscaping permitted under D17A/1124 which are outside the boundary of the current application are proposed to remain as previously granted.

The site is bounded to the south-east by Mount Anville Road; to the south by 'Mount Anville Lodge' and by the rear boundaries of 'Thendara' (a Protected Structure – RPS Ref. 812), 'The Garth' (a Protected Structure – RPS Ref. 819), 'Chimes', 'Hollywood House' (a Protected Structure – RPS Ref. 829); to the south-west by existing allotments; to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP); and to the east by the site of residential development 'Knockrabo'.

There are 3 no. Protected Structures located in the overall 'Knockrabo' landholding, but which are outside the application boundary. These include 'Cedar Mount' (a Protected Structure -

¹ 18 Fitzwilliam Street Upper, Saint Peter's, Dublin, D02 XA30

RPS Ref. 783), 'Knockrabo Gate Lodge (West)' (a Protected Structure - RPS Ref. 796), including Entrance Gates and Piers, and 'Knockrabo Gate Lodge (East)' (a Protected Structure – RPS 740) including Entrance Gates and Piers. For clarity no works are proposed to any Protected Structures as part of this proposed development.

The development, with a total gross internal area of c. 23,097.2 sqm, will consist of the construction of 227 no. residential units in 4 no. apartment blocks ranging in height from Part 2 – Part 8 storeys including semi-basement podium.

The development will provide 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units as follows:

Block E (c. 1015.3 sqm GIA) is a 5-storey including semi-basement podium apartment block comprising of 8 no. units (1 no. one bed unit and 7 no. 2 bed units).

Block F (c. 8042.2 sqm GIA) is a Part 2 to Part 8 storeys including semi-basement podium apartment block comprising 84 no. units (53 no. 1 bed units and 31 no. 2 bed units).

Block G (c. 8626.5 sqm GIA) is a Part 6 including semi-basement podium to Part 8 storey including semi-basement podium apartment block comprising of 82 no. units (37 no. 1 bed units, 40 no. 2 bed units and 5 no. 3 bed units).

Block H (c. 5413.7 sqm GIA) is a Part 6 to Part 7 storey apartment block including semi-basement podium comprising 53 no. units (7 no. 1 bed units, 45 no. 2 bed units and 1 no. 3 bed unit).

Residential Tenant Amenities comprising c. 537.2 sqm are provided at Level 00 of Block G and H to serve all residential units within this application.

Balconies/Wintergardens are provided on all elevations at all levels for the 4 no. apartment blocks, with (Private) Terraces provided at top floor levels and a communal Roof Terrace of c. 198 sqm to be provided on Block F.

The development will also provide 178 no. car parking spaces, which comprises 125 no. residential podium parking spaces, 35 no. on-street parking spaces, 16 no. visitor/drop off parking and 2 no. car sharing on-street parking spaces are provided; Provision of 389 no. private residential bicycle parking spaces and 130 no. visitor bicycle parking spaces; Provision of 12 no. motorcycle parking spaces;

All other ancillary site development works to facilitate construction, site services, piped infrastructure, 2 no. sub-stations, plant, public lighting, bin stores, bike stores, boundary treatments, provision of public, communal and private open space areas comprising hard and soft landscaping, site services all other associated site excavation, infrastructural and site development works above and below ground.

The development will be served by the permitted access road 'Knockrabo Way' (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.

The application contains a statement setting out how the proposal will be consistent with the objectives of the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, the *Goatstown Local Area Plan 2012* and the *Dún Laoghaire-Rathdown County Draft County Development Plan 2022 – 2028*.

The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

The application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dún Laoghaire-Rathdown County Council. The application may also be inspected online at the following website set up by the applicant: www.knockraboshd.com

Any person may, within the period of 5 weeks beginning on the date of receipt by An Bord Pleanála of the application and on payment of the prescribed fee of €20 (except for certain prescribed bodies), make a submission or observations in writing to An Bord Pleanála, 64 Marlborough Street, Dublin 1 or online at www.pleanala.ie, relating to the implications of the proposed development, if carried out, for proper planning and sustainable development in the area or areas concerned, and the likely effects on the environment or the likely effects on a European site, as the case may be, of the proposed development, if carried out. Submissions or observations duly made will be considered by An Bord Pleanála in making a decision on the application.

Such submissions or observations must also include the following information:

- (a) the name of the person, authority or body making the submission or observations, the name of the person, if any, acting on behalf of that person, authority or body, and the address to which any correspondence relating to the application should be sent,
- (b) the subject matter of the submission or observations, and
- (c) the reasons, considerations and arguments on which the submission or observations is or are based.

An Bord Pleanála may grant permission for the strategic housing development as proposed, or may grant permission subject to such modifications as it specifies in its decision, or may grant permission in part only, with or without any other modifications it may specify in its decision, or may refuse to grant permission for the proposed development. An Bord Pleanála may attach to a grant of permission such conditions as it considers appropriate. Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100).

A person may question the validity of a decision of An Bord Pleanála by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I. No. 15 of 1986), in accordance with sections 50 and 50A of the Planning and Development Act 2000 (No. 30 of 2000), as amended. Practical information on the review mechanism can be found in the Judicial Review Notice on the An Bord Pleanála website: www.pleanala.ie or on the Citizens Information Service website: www.citizensinformation.ie.

1.2 Site Location

The subject site is located in the suburban area of Goatstown, Dublin 14. (See Figure 2.1, 2.2, 2.3) The site is bounded to the south by Mount Anville Road, to the east by Phase 1 of the overall Knockrabo development, to the southwest by existing allotments including Cedar Mount (a protected structure) and to the north by the reservation corridor for the Dublin Eastern By-Pass (DEBP). The total site area is approximately 1.78 hectares and is predominantly greenfield. The subject site is accessed from a circa 100m section of constructed entrance road, Knockrabo Way, that also facilitates access to the adjacent Phase 1 development to the east.

The site forms part of a broader site on which the construction of Phase 1 has already taken place. Phase 1 to the east of the subject lands comprises a mix of houses and apartments and was granted under Reg. Ref. D13A/0689. The subject lands occupy the western side of this broader Knockrabo site, which has an existing grant of planning (D17A/1124) for the development of 93 No. Residential Units and Childcare Facility along with community/leisure facilities and all associated infrastructure. The Knockrabo Way entrance road previously permitted under Reg Ref D17A/1124 is proposed to remain as previously granted. The lands are located within the administrative development boundary of Dún Laoghaire-Rathdown County Council.

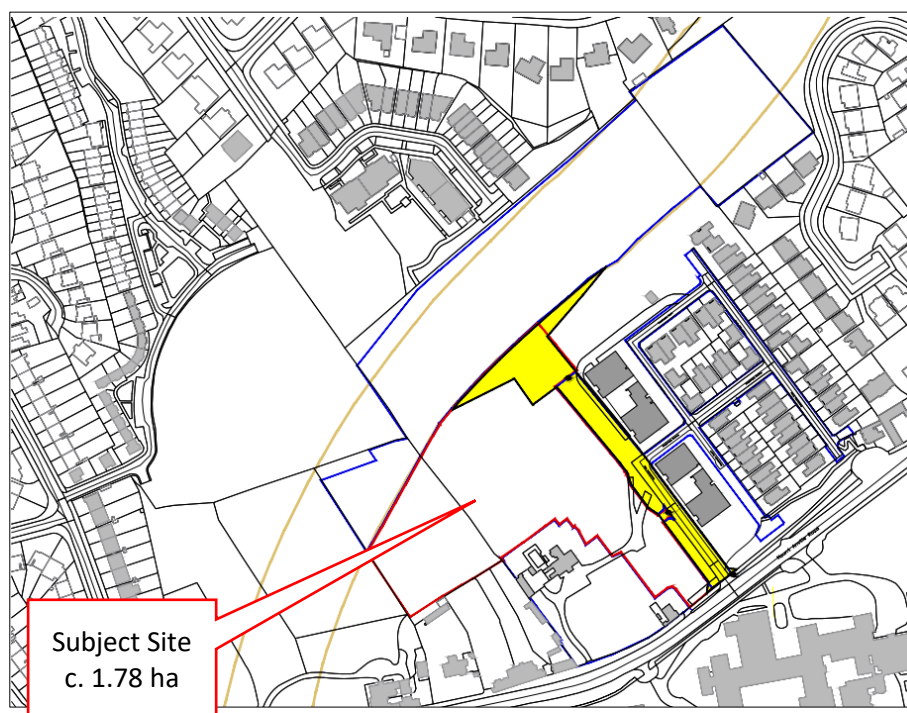


Figure 2.1: Excerpt from Site Location Map, with subject site outlined in red. Source: OMP Architects Drawing No. 1307F-OMP-00-00-DR-A-1011

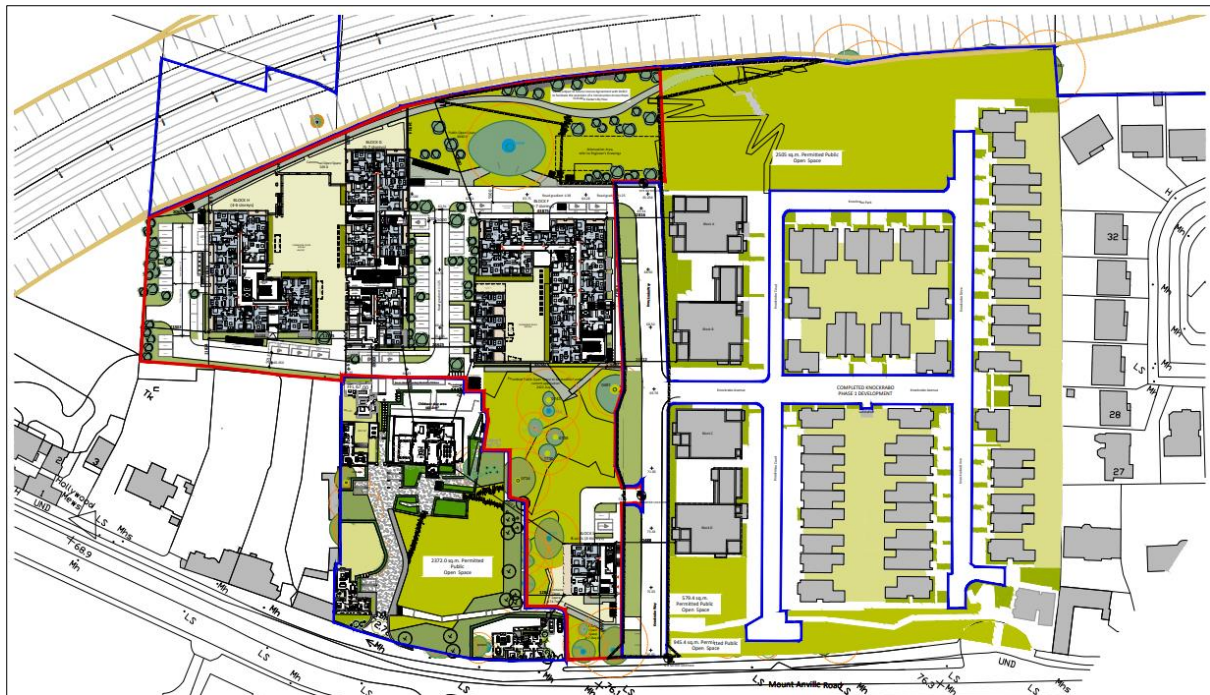


Figure 2.2: Site Context Map, Source: Google Maps, 2021



Figure 2.3: Proposed Site Layout. Source: OMP Drawing No. 1307F-OMP-00-00-DR-A-1010.

1.3 Outline of This Report

This Planning Report and Statement of Consistency provides a description of the proposed development followed by a list of the various statutory and strategic policy documents considered. The Statement demonstrates consistency with the pertinent *Dún Laoghaire-Rathdown County Development Plan 2016-2022* and *Goatstown Local Area Plan 2012 (LAP)* and the *Dún Laoghaire-Rathdown County Draft County Development Plan 2022 – 2028* and the relevant Section 28 National Guidelines as required under Section (5)(b)(i) & (ii) of the Act.

This statement has been prepared to specifically address the requirements of the strategic housing development guidance document issued by An Bord Pleanála. Please note that a separate Material Contravention Statement has been submitted in relation to the development, if approved, materially contravening the DLRCC Development Plan and The Goatstown (LAP). This standalone planning policy consistency statement, prepared by TPA Planning Consultants² demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by OMP Architects, Dermot Foley Landscape Architects and Waterman Moylan Consulting Engineers as well as other specialist's input.

1.4 Planning History

Planning Application DLRCC Reg. Ref D13A/0689; ABP Ref. PL06D.243799 (Phase 1)

On 23rd January 2015, An Bord Pleanála granted permission for a residential development comprising 88 No. dwellings (47 No. houses, including Knockrabo existing Gate Lodge (East) and 41 No. apartments), on a site of 2.54 hectares at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. This followed an earlier *Notification of Decision to Grant Permission* issued by DLRCC on 12th August 2014.

Planning Application DLRCC Reg. Ref D16A/0821 – Amendments to Permitted Blocks A, B, C (Phase 1)

A planning application was lodged on 9th November 2016 for permission to amend the above noted parent planning permission. The planning application related to the reconfiguration of permitted Apartment Blocks A, B and C, on a site of 0.34 hectares.

A *Decision to Grant Permission* was issued by DLRCC on 16th February 2016. The application resulted in a total of an additional 10 No. units within these blocks, with associated revisions to the basements and car parking facilities.

Planning Application DLRCC Reg. Ref D16A/0960 – Block D + 3 Houses – (Knockrabo Phase 1A)

A Planning Application was lodged on 20th December 2017 for Phase 1A, which included amendments to the above permitted development. The application as lodged included:

- 1 No. 5 storey apartment Block (Block D) to the south-east of permitted Block C ;
- amendments to parent permission to integrate the basement car parking level of Block D with the permitted basement level car park under Block C;
- the provision of an additional 3 No. Houses at the southern end of Knockrabo Court as permitted; and
- landscape and boundary treatment works to Mount Anville Road.

A *Decision to Grant Permission* was issued by DLRCC in 10th August 2017.

² 80 Harcourt Street, Dublin 2, D02 F449.

Condition 5 of this Permission required that the applicant submit and agree a wayleave agreement for the Dublin Eastern Bypass access route area (footpath, carriageway, construction access reservation, passing lay-by, footpath) for future construction (DEBP) vehicles at Mount Anville Road junction. This agreement is now in place, the lands will not form a wayleave, but will be subject to a Licence Agreement with DLRCC, the provisions of Article 22 (2) (b) (iii) of the Planning and Development Regulations 2001-2021 do not apply in this instance.

Planning Application DLRCC REG. REF. D17A/1124 – Phase 2 – (93 units)

A planning application was lodged in December 2017 for the Phase 2 residential development. The application as lodged generally provided for the following:

Some 4 No. blocks of apartments (Blocks E, F, G and H) ranging in height from 3 / 4 storey to 6 storey over basement comprising 69 units;

- the provision of 20 No. house units;
- the refurbishment of Knockrabo Gate Lodge (West) and existing Coach House building as residential units;
- the refurbishment of Cedar Mount to provide a mix of community / leisure uses, a Childcare Facility and 2 No. apartments.

A Further Information Request was issued by DLRCC on which included the following Item:

“The Applicant is advised that there are concerns in relation to the negative impact Block E will have, particularly given its proximity to the Gate Lodge and the impact on the setting of Cedar Mount House, in addition to the removal of a number of Category A trees. The applicant is requested to explore alternatives for the treatment of this area of the site and to submit revised proposals. In this regard revised visualisations taken from the Gate Lodge and from Cedar Mount House will be required.”

Notwithstanding the consideration of the Design Team that Block E as originally submitted represented an appropriate scale and form of development, an alternative design proposal for the Block was submitted as part of the Response to Further Information. The revised design comprised a 3 storey block with the upper floor set back on eastern and western sides providing 6 no. duplex apartments with 8 no. car parking spaces at surface level.

A number of illustrative perspective views of the block in the context of the permitted development within Phase 1 + 1A, and within the rest of this development proposal were provided with the Further Information Response which demonstrated that the block would be fully screened on the western and southern sides. The revised design also allowed for the retention of a further tree (Tree 0711) on the south eastern side of the block.

In assessing the Applicant’s Further Information Response, DLRCC continued to have concerns with regard to the impact of the scale, massing and height of Block E on the setting and amenity of the Protected Structures. Whilst it was acknowledged that the block had been revised and reduced in scale, it was considered that the block should be omitted in order to protect the integrity of the protected structure. Following a Request for Clarification of Further Information (unrelated to the proposed Block E), permission was granted for the Phase 2 scheme on 6th September 2018. The decision included the following Condition with regard to Block E:

2. Prior to commencement of development, the applicant shall submit revised drawings which show Block E omitted. This area of the site shall be incorporated into the area of open space and the existing trees on site protected and retained.

Reason: To protect the setting and amenity of the Protected Structures on site.

The decision was not subject to any third party appeal. The Phase 2 development as granted comprises 20 no. dwelling houses, the refurbished Coach House and west Gate Lodge, 2 no. apartments and a creche and community / leisure uses located within Cedar Mount, and some 57 no. apartments located within 3 no. blocks.

Further details and illustrations in relation to Reg Ref D17A/1124 are contained within OMP's Architects Design Statement. (See pages 11 – 14).

1.5 Policy Documents Considered

The following policy documents have informed this Statement of Consistency:

1. Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)
2. National Development Plan (2021 – 2030);
3. Project Ireland 2040 - National Planning Framework (2018);
4. Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031 (2019);
5. Urban Development and Building Heights, Guidelines for Planning Authorities (2018);
6. Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020);
7. Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009);
8. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018);
9. Part V of the Planning and Development Act 2000: Guidelines (2017);
10. Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
11. Transport Strategy for the Greater Dublin Area 2016 – 2035;
12. Design Manual for Urban Roads and Streets (DMURS) (2019);
13. Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020;
14. The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)
15. Urban Design Manual: A Best Practice Guide (2009);
16. Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009);
17. Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
18. Quality Housing for Sustainable Communities (2007);
19. Childcare Facilities – Guidelines for Planning Authorities (2001);
20. Housing for All – A new Housing Plan for Ireland (2021);
21. Dún Laoghaire-Rathdown County Development Plan 2016-2022;
22. Goatstown Local Area Plan 2012;
23. Dún Laoghaire-Rathdown County Draft County Development Plan 2022 – 2028.

2.0 NATIONAL AND REGIONAL PLANNING POLICY COMPLIANCE

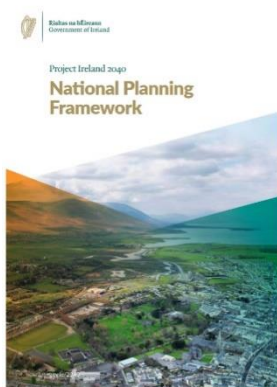
2.1 National Development Plan (2021-2030)



The National Development Plan (NDP) sets out the major public investment approved by Government which will play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years from issues such as Covid-19, Brexit, housing, health, climate action and a population projected to grow by one million people between 2016 and 2040. It is estimated that an annual average of up to approximately 47,000 direct and 33,000 indirect construction jobs will be sustained by the investment over the course of the NDP.

Extensive efforts have been made to ensure that the NDP will support the Government's climate ambitions. For the first time in Ireland, climate and environmental assessment of the NDP measures has been undertaken, along with an assessment of the alignment of the plan as a whole with the ideals of a green recovery plan. The NDP has a particular focus on supporting the largest public housing programme in the history of the state, supporting Compact Growth (NSO 1) with the aim of delivering 6,000 affordable homes each year. The plan also supports Sustainable Mobility (NSO 4) through BusConnects, Greener and Cleaner Bus Fleets and Metrolink and Dart.

2.2 Project Ireland 2040: National Planning Framework (2018)



The *National Planning Framework (NPF)*, published in February 2018, sets out a strategic development framework for the Country to 2040. The Department of Housing, Planning and Local Government, on behalf of the Government, published the National Planning Framework called Ireland 2040 Our Plan.

The high-level objectives of the plan are as follows:

- 1. In addressing future change, Ireland will continue on a path of economic, environmental and social progress that will improve our prosperity, sustainability and well-being.*
- 2. Ensuring that Ireland's many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performance and the liveability of Dublin, our cities, towns and rural areas.*
- 3. Setting out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.*
- 4. Putting in place a strategy for the sustainable development of places in Ireland and how that can be achieved, through planning, investment and implementation.*

In particular, the redevelopment of this zoned site in Goatstown would contribute to compact growth.

Under the heading of Compact Growth, the NPF is

'Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including

‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport’.

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The NPF estimates that Dublin City and suburbs will grow by c. 264,000 people in the period to 2040. Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

The NPF further notes in National Policy Objective 10

‘There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth’.

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

The subject development inherently complies with the overarching themes of the NPF by proposing a compact well-designed sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the NPF’s aims to consolidate Dublin through the development of underutilised, infill sites.

2.3 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031 (2019)



The Regional Economic and Spatial Strategy (RSES), was adopted on the 10th of May 2019 and came into effect in June 2019. The RSES notes that the preferred spatial strategy for the Eastern and Midlands is the consolidation of Dublin plus the Regional Growth Centres of Athlone, Dundalk and Drogheda, supported by planned focussed growth of a limited number of self-sustaining settlements. The Region covers 9 counties including Dublin, with three sub-regions or Strategic Planning Areas (SPAs) including the Dublin SPA. The main statutory purpose of the Strategy is to support the implementation of the NPF and the National Development Plan (NDP).

The RSES includes a strategic plan for Dublin, the Metropolitan Area Strategic Plan (MASP). To achieve the Vision. The MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area, including Compact Sustainable Growth, which aims to:

“Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.”

[Our emphasis.]

The RSES includes Policy RPO 5.5 which focuses on housing delivery. It states:

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

[Our emphasis.]

The proposed development is designed to utilise a vacant site in an urban context which is located in close proximity to a variety of amenities and services. The proposed residential development, which provides for a net density of c. 157.1 units per hectare on the subject site, is located within a 5-minute walk from the No. 11 Bus Routes and complies with the following policy;

“RPO 8.3: That future development is planning and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility”.

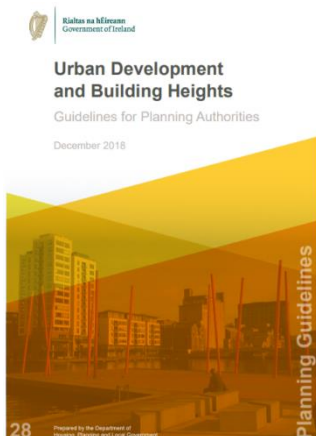
The proposed development will serve to regenerate an urban compact site and is supported by the policies of Compact Urban Development as follows;

“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.

“RPO 3.3: Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartment’s Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’”.

In our opinion, the subject development is fully in accordance with the objectives of the RSES realising the potential of infill lands in the consolidation of Dublin and its suburbs.

2.4 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)



The *Guidelines* were published in December 2018 on foot of the *National Planning Framework*. The aim of the *Guidelines* is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built-up areas.

The *Guidelines* are underpinned by the wider strategic policy considerations that planning authorities should be applying alongside their statutory development plans in securing the strategic outcomes of the *National Planning Framework* particularly in relation to compact urban growth.

The *Guidelines* state;

“Securing compact and sustainable urban growth means focusing on reusing previously development “brownfield land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities”.

The proposed development, including 4 no. apartments blocks in two to seven-storey blocks over a podium, complies with the *Guidelines*. The proposed development provides for an appropriate residential density of c. 157.1 dwellings per ha and has been designed to protect the residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents. The development is designed to be architecturally sensitive to the site location and responds to the existing urban form. A *Landscape and Visual Impact Assessment* prepared by Dermot Foley Architects is included as part of the enclosures for this application.

The proposed residential development consists of four separate apartment blocks which range in height from part two to part 8 storeys including podium;

- **Block E** (c. 1015.3 sqm GIA) is a 5-storey including semi-basement podium apartment block comprising of 8 no. units (1 no. one bed unit and 7 no. 2 bed units).
- **Block F** (c. 8042.2 sqm GIA) is a Part 2 to Part 8 storeys including semi-basement podium apartment block comprising 84 no. units (53 no. 1 bed units and 31 no. 2 bed units).
- **Block G** (c. 8626.5 sqm GIA) is a Part 6 including semi-basement podium to Part 8 storey including semi-basement podium apartment block comprising of 82 no. units (37 no. 1 bed units, 40 no. 2 bed units and 5 no. 3 bed units).
- **Block H** (c. 5413.7 sqm GIA) is a Part 6 to Part 7 storey apartment block including semi-basement podium comprising 53 no. units (7 no. 1 bed units, 45 no. 2 bed units and 1 no. 3 bed unit).

The proposed heights are considered appropriate given the sites location and the site's planning history. The development sits into the landscape as viewed in the photomontages

that accompany the application and in our opinion complies with the Urban Development and Building Heights Guidelines for Planning Authorities 2018.

Section 3.2 of the *Height Guidelines* set out a number of criteria which should be satisfied in terms of proposals for greater height which includes the following, where relevant to the proposal:

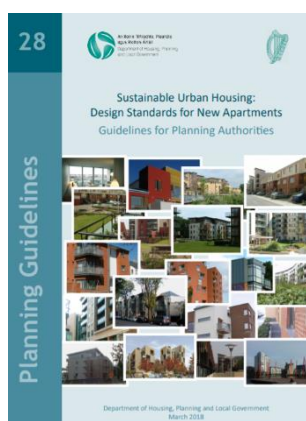
Scale	Criteria	Response
City / Town	Access to Public Transport;	<p>The subject site is 1.5km (c. 15 mins walk) from a Quality Bus Corridor (QBC) with services to the city centre running every 6 minutes and c. 19 mins walk to Dundrum Luas Stop with services running every 7 minutes to the City Centre. Bus stops served by routes 11 and 17 are located within 6 and 7 minute walking from the site, respectively, with frequencies of 15-30 minutes. Go-ahead Bus Route 175 operates along Mount Anville Road (just outside the proposed development site) with a frequency of 30 to 45 minutes in both directions during the whole day. The proposed development is located approximately 30 minutes outside of the City Centre by cycle.</p> <p>In addition, the Luas Green Line Capacity Enhancement and the BusConnects projects currently being promoted by the National Transport Authority (NTA) will improve the public transport service in Dublin City by increasing capacity and frequency for all customers. The Luas Green Line Capacity Enhancement project will provide extra capacity on the Luas Green Line and will cater for the growing demand on the line in the short to medium term by purchasing and introducing 26 new trams with 55 metre in length. According to NTA, an extended tram increases passenger capacity by 30%. The first extended tram was introduced on Luas Green Line in October 2019, with the other 25 new trams to become operational in the following months.</p> <p><i>According to BusConnects, the benefits of the network redesign include an overall increase in bus services of 25%, increased peak hour capacity, increased evening and weekend services, 24-hour operations on some routes, a 16% increase in the number of residents located within 400m of a frequent bus service to the City Centre, new connections to schools, hospitals and other essential services and increased access to jobs and education.'</i></p>
	Appropriate Visual Integration;	<p>A set of photomontages has been prepared by Model Works in respect of the proposal, which demonstrates its successful integration with the surrounding area. An LVIA has also been provided by Dermot Foley Landscape Architects and concludes; <i>'Except for the views from the immediate environs of the site, particularly along Mount Anville Road and the existing open space north east of the subject site, the proposed development will have slight to no impact. The proposed development would create a visual intrusion in short distance views, but not inappropriately or uncharacteristic in the context. The design of the buildings and open space are of a high quality and would be a well considered continuation and follow the urban design framework established by the Knockrabo Phase 1 development. For most short and mid distance views, as proposed boundary tree planting matures over time, the buildings will be further screened and integrated with the existing landscape vegetation, characteristic of the area.'</i></p>
	Contribution to place-making;	<p>The proposal will provide a significant improvement to the local area through the provision of a high quality development and open spaces which will provide an excellent residential amenity for the local community.</p>

Scale	Criteria	Response
District / Neighbourhood / Street	Contribution to the streetscape;	The proposed development provides for a positive, detailed, site-specific response to site and local context. The open space network provides for an attractive and diverse range of amenity and recreational opportunities, designed to link and integrate seamlessly with the existing high quality Knockrabo Phase 1 development adjacent. Equally the open space network enhances the strong urban design framework for the site.
	Avoidance of long monolithic walls;	The development provides for 4 No. blocks of varying lengths and heights ranging from Part 2 to Part 8 storeys including podium. The provision of high quality hard and soft landscaping will help to integrate the development into the surrounding environment.
	Contributes to the improvement of legibility;	Existing development in Phase 1, Knockrabo, and in Ardilea Crescent has laid down a high quality precedent which the proposed development will consolidate. As a whole the proposed development will make a significant contribution to the townscape of the wider area and the future context of the surrounding lands. Likewise, the proposed network of open spaces will prove good legibility and make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities for the future residents of the development.
	Contributes to the mix of uses and / or dwellings in the neighbourhood;	The development provides a mix of residential tenure and also provides residential tenant amenity space. A creche has been approved in Cedar Mount House which will serve the residential scheme.
Site / Building	Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light;	The proposed blocks have been designed in order to provide a high standard of residential amenity for new and existing residents – see enclosed <i>Daylight, Sunlight and Overshadowing Report prepared by IES</i> and <i>Noise Assessment of Development Site prepared by AWN</i> for further information.
Specific Assessments	Assessment of micro-climatic effects;	It is not expected that there will be any issue in relation to micro-climate due to the extent of the blocks and their layout within the site.
	Assessment of impacts for development locations proximate to bird and / or bat areas;	The site is not considered to be within an area of sensitivity for birds or bats. See enclosed AA Screening and EclA provided by Altemar.
	Assessment that the proposal allows for retention of telecommunication channels;	The proposed development will not impact any telecommunication channels, as heights of only two to seven storeys over podium are proposed.
	An assessment that the proposal maintains safe air navigation;	The proposed development will not impact safe air navigation as heights of only 8 storeys including podium are proposed within an existing built-up area.
	An urban design statement;	An <i>Architects Design Statement</i> has been prepared by OMP Architects and details the design rationale for the proposal.

Scale	Criteria	Response
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	A SEA or AA is not required. An Appropriate Assessment Screening, Ecological Impact Assessment and Environmental Impact Assessment Screening has been undertaken in respect of the proposal.

The proposed development, including 4 No. blocks of part two to part eight storeys including podium, complies with the Guidelines. The proposed development provides for an appropriate residential density and has been designed to protect the residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

2.5 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)



Amended revised Guidelines for Planning Authorities were issued by the Department Housing, Planning and Local Government in December 2020 in regard to apartment development.

These guidelines seek to promote high density apartment development on appropriately zoned land in appropriate locations in line with the above referenced National Planning Framework overarching policies in relation to encouraging residential development within existing urban settlements. The Guidelines are also intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes,

including families with children over the medium to long term.

The Guidelines identify three broad types of locations suitable for apartment development and advises that Planning Authorities should have regard to these proximity and accessibility considerations.

The subject lands are approximately 1.25km (15-minute walk) from University College Dublin, and approximately 1.9 km (25-minute walk) from Dundrum Town Centre, which are large employers in the area. The site is c. 1.8km (22-minute walk) from Dundrum Luas Stop. Bus Routes No. 11 and No. 175 directly serve the subject site and are located within a 5-minute walk. The No. 11 is a high frequency route with buses every 10-15 minutes at peak hours. This connects the site with Dublin City (7km/35 minutes bus journey) and Sandyford Business District (4.2km/19 minute bus journey) which is also a large employer in the County. Additionally, the development is 1.5km (15 mins walk) from a Quality Bus Corridor (QBC) with services to the city centre running every 6 minutes and similarly close to the Dundrum LUAS stop with services running every 7 minutes to the city centre.

In our opinion, the site is most appropriately defined as an 'Intermediate /Urban Location', which is defined as follows:

Intermediate Urban Locations:

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

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- ***Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services. The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors.”***

[Our emphasis]

Due to the site’s location in proximity to urban bus services, Dundrum and employment locations, the proposed density of 157.1 No. units per hectare (227 no. apartments on c. 1.78 hectares) is considered acceptable at this location.

The Guidelines also provide new apartment design standards that supersede Development Plan provisions in relation to:

- Apartment mix;
- Apartment sizes;
- Dual aspect ratios;
- Floor to ceiling heights; and
- Apartment to stair/lift ratios.

The Guidelines also provide standards in respect of:

- Internal space standards, including storage spaces;
- Amenity spaces including balconies and patios; and
- Room dimensions.

The Guidelines maintain the minimum apartment sizes contained in the 2007 Guidelines; however, they include for a number of specific planning policy requirements:

1. Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand

Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

2. For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25 ha.
 - Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;
 - Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;
 - For schemes of 50 or more units, SPPR 1 shall apply to the entire development.
3. Minimum Apartment Floor Areas:
 - Studio apartment (1 person) 37 sq. m.
 - 1-bedroom apartment (2 persons) 45 sq. m.
 - 2-bedroom apartment (4 persons) 73 sq. m.
 - 3-bedroom apartment (5 persons) 90 sq. m.
4. In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:
 - (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.
 - (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.
 - (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha., planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.
5. Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.
6. A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha. subject to overall design quality and compliance with building regulations.

Compliance with the above noted design provisions has been achieved in this development, full details in this regard are provided on the enclosed Housing Quality Assessment and Schedule of Accommodation completed by OMP Architects. The HQA illustrates how each apartment meets or exceeds the relevant standards for example in respect to apartment size, internal areas, dimensions, private open space, dual aspect etc.

In summary, a variety of apartment types of single and dual aspect are proposed with an efficient layout to allow ease of mobility and to maximise solar orientation.

Unit Mix			
1 bed	2 bed	3 bed	Total
76	145	6	227
33.5%	63.9%	2.6%	100%

In relation to the maximum of 12 apartments per floor per core which may be provided in apartment schemes, we wish to confirm that the proposed apartments are grouped between 2 and 10 units per circulation core in compliance with this standard.

Specific Planning Policy Requirement 3: Minimum Apartment Floor Area

SPPR3 requires that the following minimum floor areas are achieved for apartments:

- Studio Apartment (1 person): 37 sq. m.
- 1-bedroom apartment (2 persons): 45 sq. m.
- 2-bedroom apartment (4 persons): 73 sq. m.
- 3-bedroom apartment (5 persons): 90 sq. m.

The proposed development complies with SPPR 3. All apartments in the proposed development will meet the minimum floor area requirements set out the Guidelines. A Housing Quality Assessment (HQA), prepared by OMP Architects, confirms this.

Specific Planning Policy Requirement 4: Dual Aspect

SPPR4

SPPR 4 of the Apartment Guidelines states as follows:

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

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”*

This is an area where suburban/intermediate applies requiring a minimum of 50% dual aspect apartments. Dual aspect accounts for 51.1% (116 no.) of the apartment types in the scheme. Hence, the proposed development complies with SPPR 4. Please refer to OMP’s Housing Quality Assessment in this regard.

Specific Planning Policy Requirement 5: Floor to Ceiling Height

SPPR 5 of the Apartment Guidelines states:

“Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

The proposed development complies with SPPR 5. All apartments at ground level have a floor to ceiling height of at least 2.7 metres.

Other Design Standards for New Apartments

Communal Amenity Space:

Minimum Floor Areas for Private Amenity Space:

- Studio: 4 sqm
- One bedroom: 5 sqm
- Two bedroom (3 person): 6 sqm
- Two bedroom (4 person): 7 sqm
- Three bedrooms: 9 sqm

The proposed development complies with standards for Communal Amenity Space. 227 no. apartments are proposed 76 no. one bed, 145 no. two bed and 6 no. three bed units.

The proposed 227 no. unit scheme requires c. 1,779.5 sqm of Communal Open Space as per the 10% requirement.

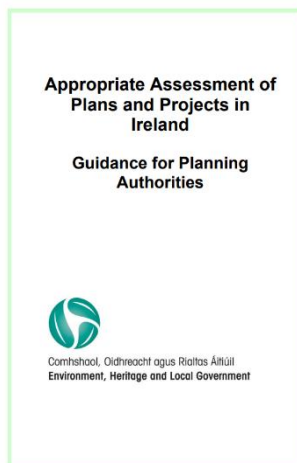
The communal amenity space for this phase of the development is provided in the form of a c. 2,176 sqm communal open space provided within the proposed development at level 00 and 01 and roof level (198 sqm).

In addition, 537.2 sqm of Tenant Amenities is provided for the residents. This comfortably exceeds the communal amenity space standards set out in the Guidelines.

Building Life Cycle Report

Paragraph 6.13 of the Guidelines requires the submission of a Building Life Cycle Report. This application is accompanied by a Management Strategy and Lifecycle Report, prepared by Cushman and Wakefield.

2.6 Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)



This guidance, prepared jointly by the NPWS and Planning Divisions of DECLG, with input from local authorities, sets out the different steps and stages that are needed in establishing whether a plan or project can be implemented without damaging a Natura 2000 site.

It indicates the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts. It is intended that planning authorities should follow this guidance. It addresses issues of mitigation and avoidance of impacts, and also the Article 6.4 derogation provisions in circumstances in which there are no alternatives and there are imperative reasons of overriding public interest requiring a plan or project to proceed.

Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations 2011-2021” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2021).

An Appropriate Assessment Screening, prepared by Bryan Deegan (MCIEEM) of Altemar Marine & Environmental Consultancy (AMEC), is submitted with this planning application. The report concludes as follows;

As concluded in the AA Screening statement prepared by AMEC;

' The proposed site is located 2.5 km from the nearest Natura 2000 site. There is no direct pathway to Natura 2000 sites. The development is not proximate to watercourses and there is no direct pathway to Natura 2000 sites.

However, there is an indirect pathway via the public surface water network and the Elm Park Stream. In addition, there is an indirect pathway via the foul water network via the WwTP plant at Ringsend. Foul water from the development will be processed in the existing Ringsend Treatment works. The indirect pathways of surface water or, foul water to Ringsend will not result in a likely significant effect on the Natura 2000 site.

As outlined in the Hydrological & Hydrogeological Risk Assessment “It is concluded that there are no pollutant linkages as a result of the construction or operation (without mitigation) of the proposed development which could result in a water quality impact which could alter the habitat requirements of the Natura sites within Dublin Bay.”

Having taking into consideration the proposed project, the effluent discharge from the proposed development works and operation, the distance between the proposed development site to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, it is concluded that this development that would not give rise to any likely significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of features of interest of Natura 2000 sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for

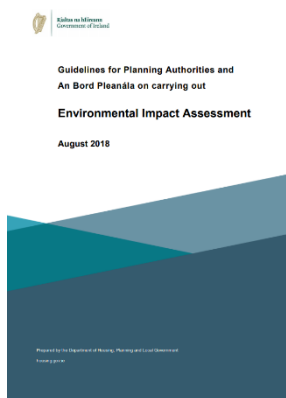
appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or Natura 2000 site.

On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

There is no possibility of significant impacts on Natura 2000 sites, features of interest or site specific conservation objectives. A Natura Impact Statement is not required.

Accordingly, having carried out the Stage 1 Appropriate Assessment Screening, the competent authority may determine that a Stage 2 Appropriate Assessment of the Proposed Development is not required as it can be excluded, on the basis of best up to date available objective scientific information following screening under Part XAB of the Acts as amended, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on any European site. Consequently, it can also be concluded that there will be no significant adverse effect on the integrity of any European site in view of its conservation objectives.'

2.7 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)



The purpose of the guidelines is to provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities. These guidelines have been adhered to in the proposed development.

Please see *EIAR Screening Report* prepared to accompany this application. An Bord Pleanála, the competent authority in this case are invited to confirm the conclusion that the proposed development is sub-threshold and that an EIAR is not required.

The EIA report concludes as follows;

“The subject project does not require mandatory EIA under Annex I of the EIA Directive. Having regard to Annex II of the EIA Directive (where EIA may be required) and Annex III of the EIA Directive the subject screening has found the following”:

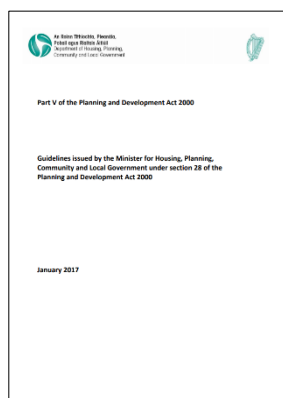
Annex II (PDR as amended, Schedule 5 Part 2)

TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 2 Class 10(b)(i)	Construction of more than 500 dwellings	Proposal involves construction of 227 no. dwellings	NO

Part 2 Class 10(b)(iv)	Urban development on area greater than 10 ha in built-up area	Site area is c. 1.78 ha.	NO
Part 2 Class 15	Any project not meeting thresholds of Part 2 but would still be likely to have significant environmental impacts having regard to criteria in Schedule 7	Proposal is not likely to have significant impacts	NO

Therefore, based on general terms (and having regard to the broad scope and purpose of the EIA Directive), It is our opinion that by virtue of its nature, size, and location, the proposed project as set out and described in this EIA Screening Statement would not be likely to have a significant effect on the environment and thus EIA is not required.

2.8 Part V of the Planning and Development Act 2000: Guidelines (2017)



This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 Guidelines, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”

(Source: Part V of the *Planning and Development Act 2000: Guidelines* (2017), p. 10.)

The Applicant has submitted information identifying 22 No. (c.10%) proposed Part V units, and related figures with this subject application. See Appendix A of this report and OMP drawing indicating location of Part V units.

2.9 Rebuilding Ireland; Action Plan for Housing and Homelessness (2016)



In 2016, the Government launched Rebuilding Ireland which targeted solutions to the ongoing supply issues in the residential sector in the



Five Pillars of the Rebuilding Ireland Action Plan

This 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 rented sector.

The development proposed will directly contribute to Pillar 2 seeking to ‘Accelerate Social Housing’, and Pillar 3 which seeks to ‘Build More Homes’. 227 no. residential dwellings are proposed in a mix of unit types and sizes to fit a broad tenure demand. 10% of the units are proposed for transfer as social housing. The scheme will therefore indirectly assist in Pillars 1 and 4 which seek to ‘Address Homelessness’ and ‘Improve the Rental Sector’, respectively.

2.10 Transport Strategy for the Greater Dublin Area 2016 – 2035



This strategy has been prepared by the National Transport Authority. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030. The Strategy includes five overarching objectives to achieve the vision which are as follows:

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

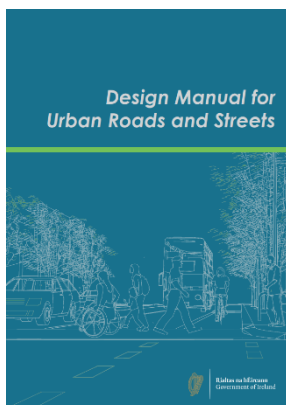
The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

The strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government’s transport 21

investment framework are included in all of the strategy options. One of these major infrastructure schemes is referred to as objective RAIL 9 which proposes the ‘upgrade of Luas green line to Metro (St. Stephen’s Green to Cherrywood/Bride’s glen)’. This infrastructure scheme is identified as one such measure which will help achieve each of the five overarching objectives of the Strategy listed above.

The proposed residential development, which provides for a density of 157.1 units per hectare, adjacent to existing good quality public transport, is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

2.11 Design Manual for Urban Roads and Streets (DMURS) (2019)

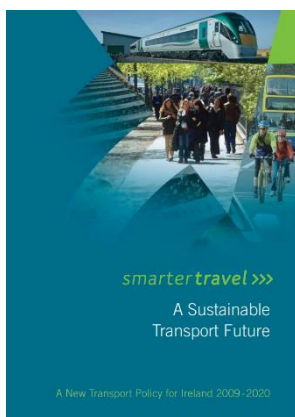


A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The principle design guidance of DMURS has been considered in the design of this development. The proposed development seeks to prioritise pedestrian and cyclists

throughout and around the site in accordance with the policies set out in DMURS.

The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement. Waterman Moylan have prepared an accompanying *Engineering Assessment Report* which contains a DMURS compliance statement, which confirms that the proposed development is consistent with the principles and guidance of DMURS.

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



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

Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;

➤ 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;

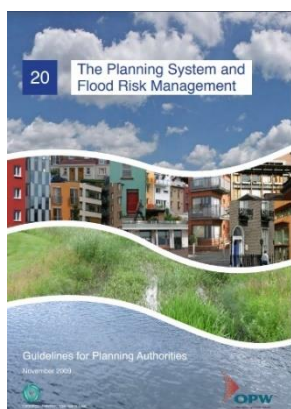
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;

- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

Key to the achievement of these targets is better alignment between land-use and transport to minimise travel demand. The subject site is located within a 5 minute walk of a high frequency peak time Dublin Bus service (the No. 11).

It is proposed to provide 178 no. car parking spaces which amounts to c. 0.70 car parking spaces per residential unit based on the accessibility of the site to centres of employment and the high level of public transport available to the residents of the scheme. This is in keeping with the principles of Smarter Travel. Furthermore 519 no. bicycle parking spaces will be provided which is in excess of Development Plan Standards and fully in accordance with Bicycle Parking Requirement as outlined in the Apartment Guidelines 2020.

2.13 The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)

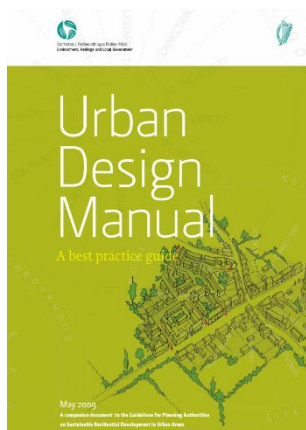


The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into

the process of making decisions on planning applications and planning appeals.

Please refer to the accompanying Flood Risk Assessment prepared by Moylans, which has been prepared in accordance with the Guidelines. In summary, the Assessment concludes that that no area of the subject site is liable to flood from fluvial, coastal or groundwater sources. All sources indicate that there is a low risk of flooding on site and that the site is outside of any flood risk zone which is appropriate for residential or mix-used developments.

2.14 Urban Design Manual: A Best Practice Guide (2009)



The Design Manual sets out a series of 12 criteria, which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are listed below, with a response to each provided, which should be read in conjunction with the Architects Design Statement.

These principles are: Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy/Amenity, Parking and Detailed Design. These principals are re-affirmed in Goatstown LAP in Chapter 4.2 under Policy UD2.

In short, the proposal’s response to the various criteria set out by the Guidelines may be summarised as follows:

Neighborhood	Context	How does the development respond to its surroundings?
	Connections	How well is the new neighborhood / site connected?
	Inclusivity	How easily can people use and access the development?
	Variety	How does the development promote a good mix of activities?
Site	Efficiency	How does the development make the appropriate use of resources, including land?
	Distinctiveness	How do the proposals create a sense of place?
	Layout	How does the proposal create people-friendly streets and spaces?
	Public Realm	How safe, secure and enjoyable are the public areas?
Home	Adaptability	How will the buildings cope with change?
	Privacy/Amenity	How do the buildings provide a high-quality change?
	Parking	How will the parking be secure and attractive?
	Detailed Design	How well thought through is the building and landscape design?

Table 2.1 - 12 Urban Design Criteria (Source: Urban Design Manual May 2009)

The design strategy for the overall development scheme including the subject application of the Phase 2 lands remains consistent with the overall site strategy for the Knockrabo Masterplan in previous iterations which include, creation of significant public open space that retains mature trees along the northern edge of the site, as well as in front of the Cedar Mount House.

The subject scheme proposes three development zones with apartment blocks:

1. Block E, beside the site entrance, which frames the square with the existing oak tree and demarcates the entrance to the site;
2. Block F, which is on the footprint of permitted Blocks G/F in the extant permission, and is of similar scale, and incorporates a communal courtyard;
3. Blocks H and G, which are organised around a communal courtyard;

The building height strategy proposed follows a varied building height provision across the site where the buildings of relatively low height are located closer to the Cedar Mount House and the taller structures are located closer to the northern boundary.

1. Neighbourhood Context: How does the development respond to its surroundings?

The proposed development has been designed to positively respond to the surrounding established residential developments. The proposed apartment blocks are designed to appropriate heights and include set-back upper levels to ensure that the residential amenity of adjacent properties and historic buildings are maintained and protected.

2. Connections: How well is the new neighbourhood / site connected?

The development's location close to Primary Schools and Secondary Schools, Dundrum Town Centre, University College Dublin and the LUAS Green Line means that the future resident population will have direct access to a range of facilities.

3. Inclusivity: How easily can people use and access the development?

The proposed development provides a range of residential unit types, including one-bedroom, two-bedroom, and three-bedroom apartments, which will cater to a range of tenures, to meet the needs and requirements of all sectors of the community. A proposal for the provision of Part V housing has been issued to the Local Authority for approval.

The design of the scheme ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the Building Regulations. Accessible car parking provision is also provided in the development. High-quality, useable public open space is provided for within the development.

4. Variety: How does the development promote a good mix of activities?

As stated above, a mix of housing types and sizes is proposed to cater for a variety of housing needs and create a strong and sustainable mixed community.

5. Site Efficiency: How does the development make the appropriate use of resources, including land?

The proposal will connect to and make most efficient use of existing services and infrastructure. As stated above, the scheme will have a residential density of c. 157.1 no. units per hectare. We contend that this an efficient use of the underutilised suburban lands and supports the *NPF* and *RSES* objectives to consolidate development in Dublin.

6. Distinctiveness: How do the proposals create a sense of place?

The proposed landscaping scheme will ensure that the proposal assimilates well into its surroundings thus creating a sense of place. Furthermore, a quality design approach, has been adopted to ensure that the scheme integrates into the surrounding context and with Phase 1 development at Knockrabo.

7. Layout: How does the proposal create people-friendly streets and spaces?

The scheme layout caters for pedestrian desire lines and the entrance road has been designed to control speeds and encourage pedestrian movements. The layout also provides residential amenity space and a variety of informal play spaces at various accessible locations throughout the proposed development.

8. Public Realm: How safe, secure and enjoyable are the public areas?

Public open space is appropriately located in the scheme and is fully accessible for all residents and visitors. All open space areas are overlooked to provide natural surveillance.

9. Home Adaptability: How will the buildings cope with change?

House types are designed to be adaptable and capable of catering for cross-generational use. The design of the apartment buildings is disposed to future adaptation.

10. Privacy/Amenity: How do the buildings provide a high-quality amenity?

All dwellings enjoy dedicated private open space which is not unduly overlooked. Furthermore, as a result of generous setbacks between the proposed blocks and existing residential development, no adverse overlooking or overshadowing will arise as a result of the development.

11. Parking: How will the parking be secure and attractive?

The development proposes 178 no. car parking spaces for 227 no. residential units comprising of 125 no. residential podium car parking spaces, 35 no. residential on street car parking spaces and 16 no. visitor on street car parking spaces.

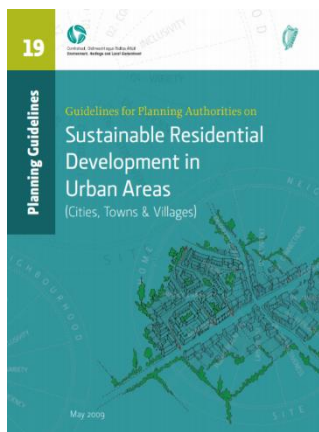
In addition to this, the development proposes to supply 2 No. Go Car spaces where each car sharing vehicle that is placed in a community has the potential to replace the journeys of up to 15 private cars. This equates to c. 0.70 spaces per residential unit which is considered to be appropriate with regard to the location of the site and its proximity to public transport and local amenities. This is in line with Government Guidance regarding reducing dependence on the private motor car and increasing use of public transport/cycling.

The development proposes a mix of podium, residential on-street, visitor on-street parking spaces which reduces the impact of the car parking provision for the proposed development. The provision of parking spaces at podium level ensures maximised levels of public open space areas which are interconnected across the subject development scheme, thereby protecting local amenity and increasing pedestrian connectivity across the site.

12. Detailed Design: How well thought through is the building and landscape design?

The design of the proposal has been a collaborative effort from its inception, with the various opportunities and constraints addressed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, and planning expertise) in an iterative manner. The proposal has also been informed by the expert inputs of the various specialist consultants to ensure that appropriate mitigation / avoidance measures are 'designed into' the scheme from the outset.

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



The *Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, (2009)* and its associated document *Urban Design Manual – A Best Practice Guide (2009)* illustrate essential criteria for sustainable urban residential development and describes how a scheme can integrate seamlessly into a site, taking consideration of its surroundings and thus presenting the best possible residential design scheme in built-up areas.

These Guidelines provide National Guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question. We submit that the subject site is best described under the Guidelines as ‘Infill Residential Development’, which is defined in the Guidelines as:

*“Potential sites may range from small gap infill, unused or derelict land and backlands areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. **In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.** The local area plan should set out the planning authority’s views with regard to the range of densities acceptable within the area. **The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.** Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands.”[Our emphasis.]*

The proposed development will have a net density of c. 157.1 no. units per hectare. This density is appropriate for the site having regard to the following:

- The *National Planning Framework (Ireland 2040 – Our Plan)*, RPGs, and *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)*, which promote higher residential densities and consolidation in the Dublin area;
- The provision of high-quality open space;
- The established suburban nature of the wider surrounding area;
- The site’s proximity to a range of facilities and amenities including Dundrum Town Centre, employment centres, schools and University College Dublin;
- The infrastructural capacities in the area, including, *inter alia*, the roads and drainage networks;
- The accessibility of the site in relation to public transport networks.

The supporting planning documentation demonstrates that the proposed scheme will not negatively impact on the neighbouring land uses nor contravene the site’s land use zoning (Objective A) which aims “*protect and-or improve residential amenity*”.

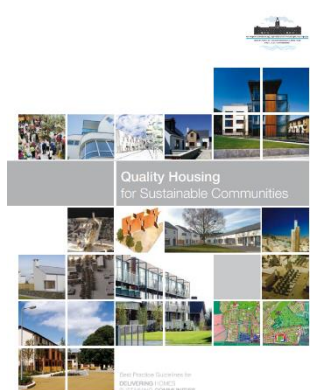
Generous separation distances between the new and proposed residential units ensure there is no undue overshadowing or overlooking impacts arising from the proposed development. In addition to the high-quality design approach that has been adopted for the residential units, the proposed landscaping plan for the proposal will ensure from the outset that the proposed development settles into the surrounding context.

The proposed development strikes an appropriate balance between the protection of the amenities and privacy of adjoining dwellings; the protection of established character of the area; and the need to provide residential infill development at an adequate density, particularly in serviced urban areas. The scheme provides a layout and housing typology that responds appropriately to the site and surrounding area.

2.16 Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities



The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.



The Delivering Homes, Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities'. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes. They encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the

benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

This planning application is accompanied by a Housing Quality Assessment (HQA) document prepared by OMP Architects which demonstrates the consistency of the proposed development with the relevant standards in the Quality Housing for Sustainable Communities document and the County Development Plan where relevant.

2.17 Quality Housing for Sustainable Communities (2007)



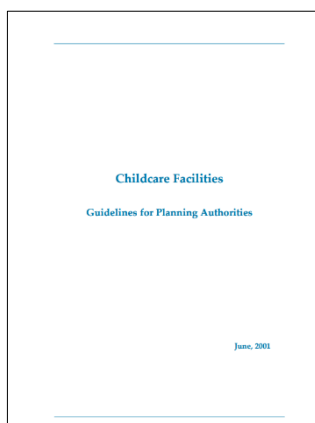
The stated aim of the *Quality Housing for Sustainable Communities, Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)* is to:

“identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant.”

These Guidelines along with the Development Plan standards for housing have informed the design of the 227 no. apartments proposed in the scheme.

OMP Architects have provided a Housing Quality Assessment for the proposed residential units. This shows that the proposed apartments are compliant with the above Guidelines and Development Plan standards.

2.18 Childcare Facilities – Guidelines for Local Authorities (2001)



The *Childcare Facilities Guidelines (2001)*, generally recommend the provision of childcare facilities for residential development with 75 no. units or more, having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area.

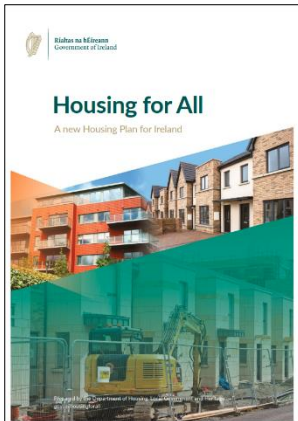
The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)* note that 1-bed or studio type units should not generally be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

Please refer to the accompanying *Childcare Capacity Audit*, dated October 2021, which accompanies this submission.

That assessment concludes:

‘While the maximum number of childcare places that will be required to serve the subject development is 70 No. places, the demographic analysis suggests that less than 45 No. places are likely to be utilised at this location and it is our opinion that the demand for childcare generated by the proposed development may also be partially absorbed by the existing childcare network (i.e., 22 No. operational facilities providing more than 1,100 No. childcare places). Furthermore, we note that a 400 sq. m childcare facility was previously permitted under Reg. Ref. D17A/1124 (see previous Figure 1.2) with sufficient capacity to accommodate the additional childcare demand generated by the proposal once completed. ‘

2.19 Housing for All – A new Housing Plan for Ireland (2021)



A new National Plan addressing housing supply has recently been launched for the period 2021-2030. According to 'Housing for All – A New Housing Plan for Ireland' (2021), Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households as outlined in the National Planning Framework up from approximately 20,000 homes a year.

“Increasing New Housing Supply” is one of four pathways identified by the Plan to achieve the objectives. Under this pathway, new arrangements will be introduced for Large-Scale Residential Developments (LSRD) that will replace the current Strategic Housing Development (SHD) arrangements.

The proposed development will contribute to the increased supply required to meet the demand for housing in Dublin, including the provision of social/affordable housing.

3.0 LOCAL PLANNING POLICY COMPLIANCE

This section of the report provides an account of the relevant local planning policy framework provided primarily by the *Dún Laoghaire-Rathdown County Development Plan 2016-2022* and the *Goatstown Local Area Plan, 2012*. It also reviews at a higher level the *Dún Laoghaire-Rathdown Draft County Development Plan 2022-2028*. The Draft Plan is expected to be adopted in March 2022.

The *Goatstown Local Area Plan, 2012* (hereinafter referred to as the *LAP*), which was adopted by the Local Authority in April 2012, is the Local Area Plan for the Goatstown area, which includes the subject site at Knockrabo. The lifetime of the *LAP* was extended by resolution up to April 2022.

No draft Local Area Plan for Goatstown has been provided to allow a review at this stage in time.

3.1 Dún Laoghaire-Rathdown County Development Plan 2016-2022

The site is located within the administrative are of Dún Laoghaire-Rathdown County Council and is therefore subject to the policies of the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, which was adopted by the Local Authority on 16th March 2016.

The County Development Plan is currently under review. In the review of the Draft Plan 2022 -2028 (Map 1 and 2), the site remains zoned '*Objective A – To provide residential development and /or protect and improve residential amenity*' as indicated on the Plan below.

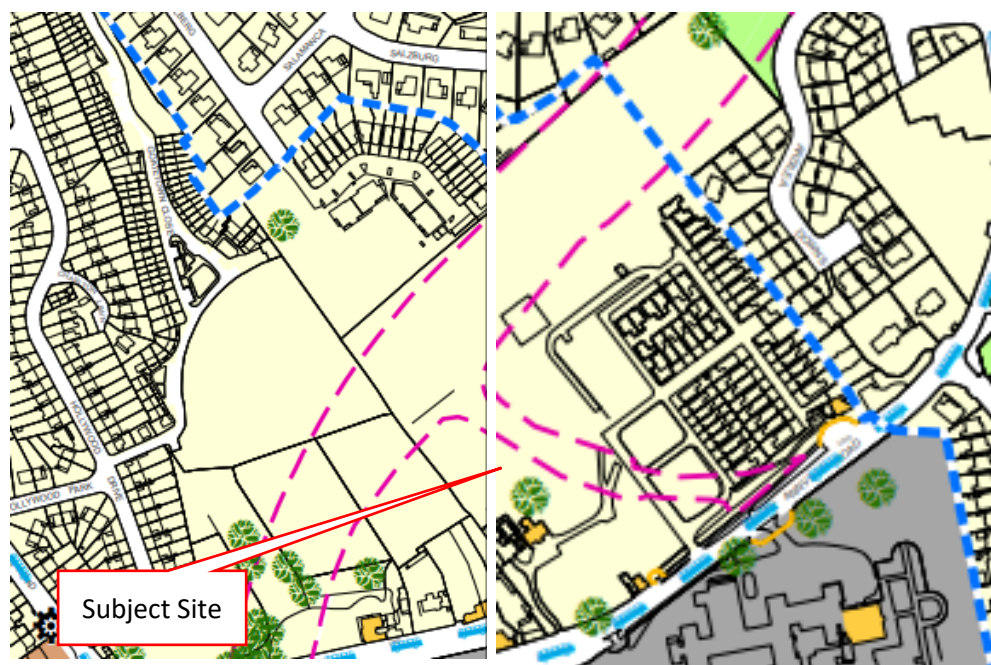


Figure 3.1: Extract from Zoning Maps 1 and 2 in Dun Laoghaire-Rathdown County Council Draft Plan 2022 - 2028. (Source: *Dún Laoghaire Rathdown Draft County Development Plan 2022 -2028*)

3.1.1 Core Strategy & Settlement Strategy

The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence-based “Core Strategy” (CS) to be incorporated as part of County Development Plans. The purpose of a Core Strategy is to articulate a medium-to longer term quantitative-based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional development objectives.

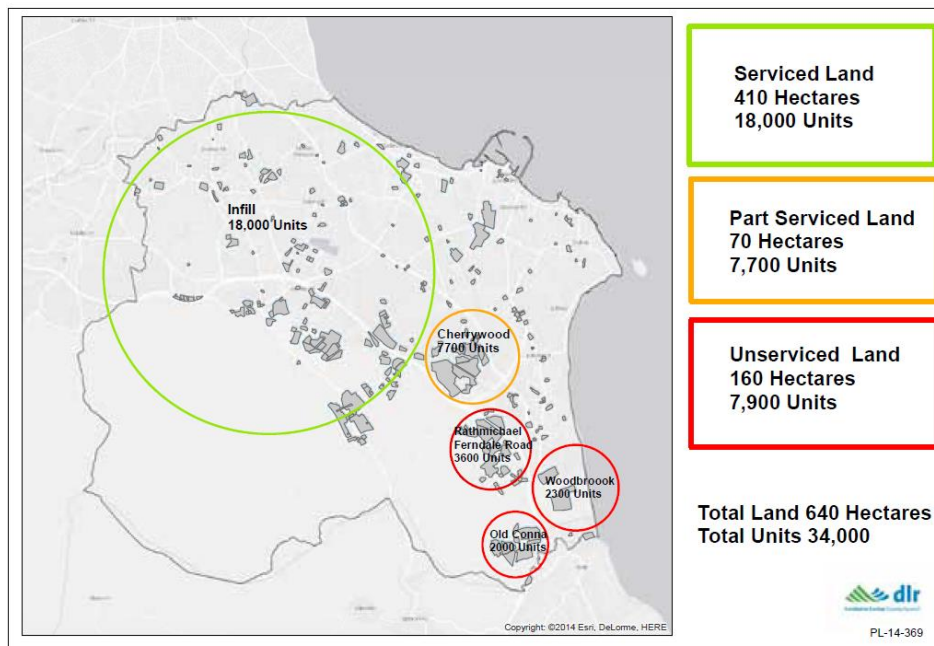


Figure 3.2: Serviced, Part Serviced and Unserviced Land in Dun Laoghaire-Rathdown County Council. (Source: Dún Laoghaire Rathdown County Development Plan 2016-2022.)

Section 1.2 of the *Development Plan* sets out its Core Strategy as follows:

“The purpose of a Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with National and Regional development objectives as set out in the National Spatial Strategy 2002-2022 (NSS) and the Regional Planning Guidelines 2010-2022 (RPGs).....The central focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for residential development and the projected demand for new housing, over the lifetime of the Plan. In this respect, two key datasets are examined:

- *Housing Land Availability Study (Supply of zoned land)*
- *Regional Planning Guidelines for the GDA (Population Targets)”*

The DLR Core Strategy supports the delivery of 18,000 no. residential units, on 410 hectares of serviced land, which includes the subject site, with further units provided elsewhere. (See Figure 3.2 and 3.3)

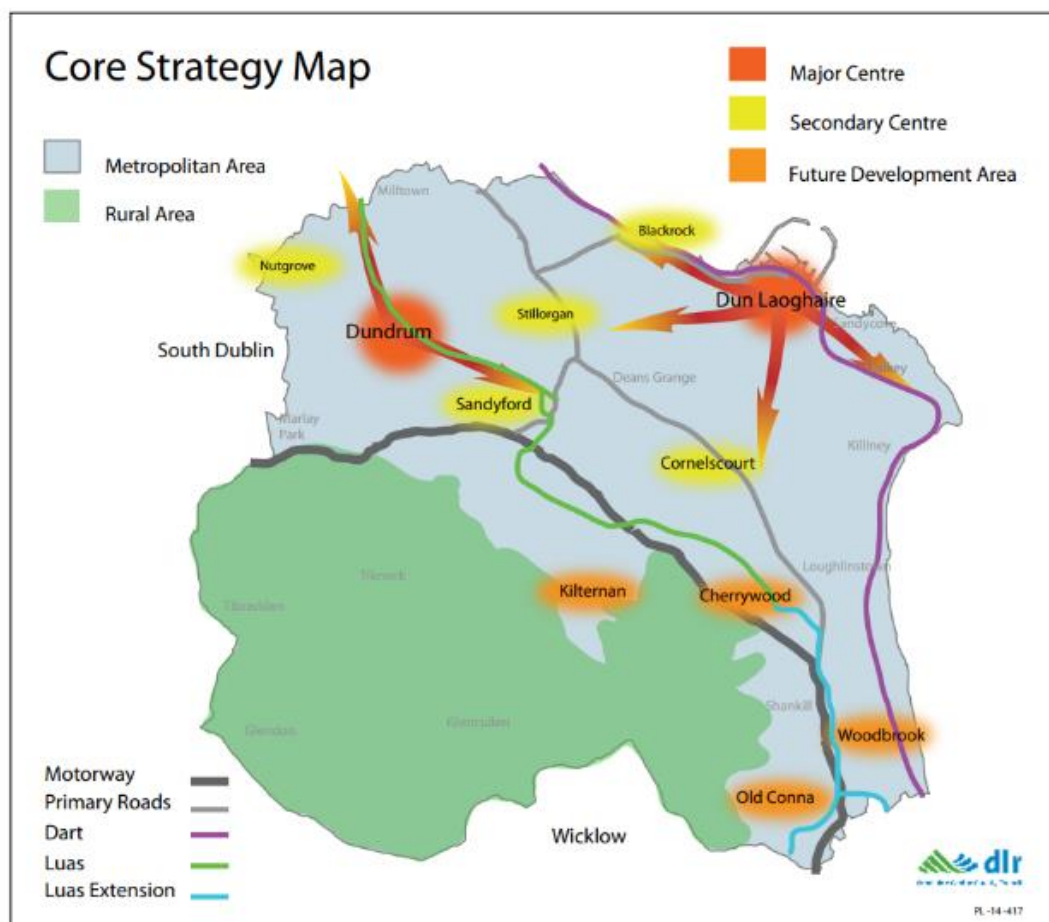


Figure 3.3: Core Strategy Map. (Source: *Dún Laoghaire Rathdown County Development Plan 2016-2022*.)

The plan states in relation to settlement Hierarchy in Section 1.2.2;

'In broad terms the primary implications of the Regional Planning Guidelines for Dún Laoghaire Rathdown are:

- Dún Laoghaire-Rathdown falls almost exclusively within the Metropolitan Area where the primary objective is one of consolidation of the existing urban area.*
- Dún Laoghaire-Rathdown has the advantage of major transport corridors traversing it - the N11 QBC, Rathfarnham QBC, the DART and Luas Lines B, B1 and B2 (planned). The RPG strategy considers these corridors to be absolutely fundamental to future growth and should be capitalised upon.*
- Dundrum and Dún Laoghaire, as designated 'Metropolitan Consolidation Towns' are identified as key urban nodes with potential to grow as important development centres due to their favoured location with regard to public transport networks, comparison shopping facilities and employment and services provision.*
- Cherrywood, as a designated Large Growth Town within the Metropolitan Area, will accommodate significant new investment in transport, in economic and commercial activity and in housing. As a designated Strategic Development Zone it will help contribute to the overall competitiveness of the GDA and so assist the overall objective of promoting the GDA as an International 'Gateway', as set out in the National Spatial Strategy.'*

The Plan further states in Section 1.2.5 in relation to housing demand/supply;

'While a key strand of the overall Settlement Strategy focuses on the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban/ suburban built form – and thereby maximizing efficiencies from already established physical and social infrastructure - the development of the new, higher density strategic growth nodes in the south and south-east of the County will be dependent on the concurrent delivery of adequate water services and upgraded /planned public transport infrastructure.....In addition to the major parcels of zoned development land detailed above, the ongoing incremental infill and densification of the existing urban area will generate, over time and on a cumulative basis, relatively significant house numbers.'

[Our emphasis]

The provision of 227 no. residential units along with associated tenant amenities accords in full with the stated objective of meeting the County's projected housing needs in line with the Core Strategy for the Metropolitan Area in terms of consolidating the existing urban area.

3.1.2 Subject Lands Zoned for Residential Development

The subject lands are zoned Objective 'A', which is 'To protect and-or improve residential amenity'. (See Figure 3.4) Residential and ancillary uses are permitted under this zoning objective.

The site is also subject to a Strategic Road Reservation which is indicated as a dashed pink line on Figure 3.4. This reservation is for the Eastern Bypass. In this regard, please refer to the accompanying Material Contravention Statement which highlights a potential contravention in relation to this map-based objective. In summary, the detail of the Eastern Bypass reservation line as it relates to the Knockrabo lands was granted permission in a previous application on the site (D17A/1124) and this differs somewhat from the pink dashed line that is indicated on the Development Plan Map.

There is a Specific Objective on the site to preserve Trees and Woodlands and there are three protected structures contained within the overall Knockrabo lands comprising two gatelodges and Cedar Mount House situated to the west of the development site. These protected structures are not part of the application site boundary.

The site is subject to the Goatstown LAP 2012. This will be discussed in detail following a review of the relevant *Dún Laoghaire-Rathdown County Development Plan 2016-2022* policy objectives.



Figure 3.4: Site location (outlined in Red) and the associated 'A' zoning objective. (Source: Interactive Map, *Dún Laoghaire Rathdown County Development Plan, 2016-2022*. Annotated by TPA, 2021)

3.1.3 Residential Density

In terms of the density provisions within the *Dun Laoghaire-Rathdown County Development Plan 2016-2022*, **Policy RES 3** in relation to Residential Density states:

“Policy RES3: Residential Density*

It is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development. In promoting more compact, good quality, higher density forms of residential development it is Council policy to have regard to the policies and objectives contained in the following Guidelines:

- *‘Sustainable Residential Development in Urban Areas’ (DoEHLG 2009).*
- *‘Urban Design Manual - A Best Practice Guide’ (DoEHLG 2009).*
- *‘Quality Housing for Sustainable Communities’ (DoEHLG 2007).*
- *‘Irish Design Manual for Urban Roads and Streets’ (DTTaS and DoECLG, 2013).*
- *‘National Climate Change Adaptation Framework - Building Resilience to Climate Change’ (DoECLG, 2013).”*

The proposed scheme has a density of c. 157.1 units per ha which is compliant with local and national policy, to provide in excess of 50 units/ha, having regard to the site's location. This report has confirmed that the proposed development is compliant with the Guidelines listed and more recent statutory plans, such as the NPF, which emphasises the need for increased residential densities in existing urban areas.

3.1.4 Densification of Residential Areas

Section 2.1.3.4 of the *Development Plan Policy RES4* supports the densification of existing built up areas:

“Policy RES4: Existing Housing Stock and Densification*

It is Council policy to improve and conserve housing stock of the County, to densify existing built-up areas, having due regard to the amenities of existing established residential communities and to retain and improve residential amenities in established residential communities.”

The proposed development complies with Policy RES4 as it provides additional residential units at residentially zoned lands, on serviced lands in an established urban area. The proposed development has been designed to respect the amenities of adjoining residential communities.

3.1.5 Overall Housing Mix

Section 2.1.3.7 of the Development Plan, **Policy RES7** relates to housing mix:

“Policy RES7: Overall Housing Mix

It is Council policy to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the Interim Housing Strategy.”

The proposed development provides a mix of dwelling types including 1, 2 and 3 bed units that will accommodate a variety of tenures and is, therefore, compliant with RES7.

3.1.6 Social Housing (Part V)

The Development Plan in **Policy RES8** notes the following in respect of Social Housing (Part V):

“Policy RES8: Provision of Social Housing

It is Council policy to promote the provision of social housing in accordance with the projects outlined in the Council's Interim Housing Strategy and Government policy as outlined in the DoECLG 'Social Housing Strategy 2020'.”

The proposed development is subject to the requirements of Part V of *the Planning and Development Act 2000* (as amended). The Applicant has prepared a Part V proposal to accompany the application.

3.1.7 Residential Development – General Requirements

Section 8.2.3.5 of the *Development Plan* is entitled Residential Development – General Requirements. This Section of the *Development Plan* states, *inter alia*:

“(iv) Phased Development

It is policy of the Planning Authority that no large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development. A phasing schedule for any such development shall be submitted with a planning application.”

The development is proposed to be built-out in one phase.

The proposed development provides 227 no. apartments. The subject site is located within a well-established and serviced suburban area, which benefits from a wide range of community infrastructure and amenities.

The accompanying engineering reports prepared by Waterman Moylans Consulting Engineers include assessments of the piped infrastructure and roads. The reports confirm that capacity is available to support the proposed development.

There are a number of recreational and sporting facilities in the area including indoor and outdoor facilities available at University College Dublin.

There are a number of local retail shops at the crossroads within a five-minute walk, and larger shops and a wider range of facilities in Dundrum, located c. 1.25km to the west.

The subject site is also close to existing primary and secondary schools, including Our Lady’s Grove Primary School; Taney Parish Primary School; Mount Anville College; St. Killian’s German School; and Ashfield College. As noted above, the subject site is also located in close proximity to University College Dublin.

The proposed development also provides a new public space, suitable for both passive and active recreation, as well as a number of formal and informal play spaces for children.

3.1.8 Public/Communal Open Space

Chapter 8 of the *Development Plan* has the stated aims of ensuring orderly and sustainable development through the use of objectives and standards for development management.

Section 8.2.2 of the *Development Plan* relates to ‘Public/Communal Open Space Quantity’. This section states *inter alia*:

“(i) Residential / Housing Developments

Open Space: For all developments with a residential component – 5+ units - the requirement of 15 sq m - 20 sq m of Open Space per person shall apply based on the number of residential/housing units. For calculation purposes, open

space requirements shall be based on a presumed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms. A lower quantity of open space (below 20 sq m per person) will only be considered acceptable in instances where exceptionally high quality open space is provided on site and such schemes may be subject to financial contributions as set out under Section 8.2.8.2 (iii) below.

The Planning Authority shall require an absolute default minimum of 10% of the overall site area for all residential developments to be reserved for use as Public Open and/or Communal Space irrespective of the occupancy parameters set out in the previous paragraph.'

Approximately 31.9% of the subject site area is provided as Public Open Space in the proposed development, which is well in excess of *Development Plan* standards.

3.1.9 Urban Design Principles

The *Development Plan* in **Policy UD1** states the following in respect of Urban Design Principles:

"Policy UD1: Urban Design Principles

It is Council policy to ensure that all development is of high-quality design that assists in promoting a 'sense of place'. The Council will promote the guidance principles set out in the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013) and will seek to ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design."

The proposed development complies with the '*Urban Design Manual – A Best Practice Guide*' (2009), and the '*Design Manual for Urban Roads and Streets*' (2013) as described in Section 2.14. Moylans Engineers have prepared the enclosed *Engineering Assessment Report* stating compliance with DMURS which confirms compliance with same.

3.1.10 Design Statements

The *Development Plan* in **Policy UD2** requires the preparation of Design Statements for residential developments:

"Policy UD2: Design Statements

It is Council policy that, for all medium-to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as required by the Planning Authority) a 'Design Statement' shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual – A Best Practice Guide' (DoEHLG, 2009)."

In accordance with this Policy, OMP has prepared an *Architectural Design Statement* in respect of the proposal, which demonstrates that the scheme's layout and design conforms to best practice.

3.1.11 Public Realm Design

The *Development Plan* in **Policy UD3** states the following in respect of Public Realm:

“Policy UD3: Public Realm Design

It is Council policy that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.”

The proposed development will result in the development of a private, underutilised site. It will provide an enhanced public realm, including new open space areas, comprising c. 31.9% of the overall site, which is well in excess of development plan standards.

In accordance with this Policy, Dermot Foley Landscape Architects has prepared a *Landscape Design Rationale*, which illustrates the range of design proposals which ensure the proposed development complements the surrounding area and contributes positively to an enhanced public realm.

3.1.12 Building Height Strategy

The *Development Plan* in **Policy UD 6** states the following in respect of Building Heights:

“Policy UD6: Building Height Strategy

It is Council policy to adhere to the recommendations and guidance set out within the Building Height Strategy for the County.”

Appendix 9 ‘Building Height Strategy’ outlines *Development Plan* policy in relation to building height. Section 3.4 ‘Suburban Infill’ of the ‘Building Height Strategy’ states:

“There has been a discernible pattern of gradually increasing residential densities in ‘infill’ sites within the built up area of the County over the last decade or so. Many of these infill developments have been at a higher density and with a taller building height profile than the prevailing local low rise context. This pattern of development has been driven in response both to the Government document “Residential Density Guidelines” (1999) and through policies contained in the 2004 County Development Plan which encouraged higher densities, particularly on large development sites, in excess of 0.5ha in area.....The general approach in terms of building heights in these sites has been to taper height from a high point in the centre of the site down to the site boundaries where the height of adjacent buildings can often be lower.”

The scheme proposes 4 no. apartment blocks which range in height from part two to part eight storeys at its tallest point including a podium. In accordance with the ‘Building Height Strategy’, the apartment blocks are located appropriately within the site to ensure there is no

overlooking or overbearing impacts from the proposed development on the surrounding existing development.

Furthermore, the enclosed *Sunlight and Daylight Report*, prepared by Integrated Environmental Solutions (IES), confirms that the “*proposed development performs well when compared to the BRE recommendations in the BRE ‘Site Layout Planning for Daylight and Sunlight’ guide, sometimes referred to as BRE Digest 2019.*”

3.1.13 Residential Development Standards

Section 8.2.3 of the *Development Plan* outlines the development management standards for residential development. This guidance in some cases has been superseded by the 2020 Apartment Guidelines, which provide a number of Specific Planning Policy Requirements (SPPRs), including certain minimum and maximum standards the minimum standards for apartment units. Where any conflict arises between an SPPR and the *Development Plan*, the Guidelines supersede the *Development Plan*. The enclosed *Housing Quality Assessment*, prepared by OMP Architects, demonstrates compliance with the relevant standards. These are also discussed in detail in Section 2.5 of this report.

3.1.14 Dwelling Size and Mix

The *Development Plan* in **Policy RES9** requires that residential schemes provide a range of housing types and sizes, particularly having regard to the County’s higher than national average proportion of population aged over 65, and the need to encourage mobility in the housing market. In accordance with the *Development Plan*, a variety of dwelling unit types and sizes are proposed as part of the scheme, which will be suitable for a variety of household types.

3.1.15 Residential Density

The *Development Plan* states that site densities should be determined with reference to the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009)*. The *Development Plan* states *inter alia*:

“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.”

As previously stated, the proposed development will have a residential density of c. 157.1 no. units per hectare. This is in accordance with the *National Planning Framework (Ireland 2040 – Our Plan)*, which promotes higher residential densities at serviced urban locations and considering the site’s context.

3.1.16 Car Parking

Table 8.2.3 of the *Development Plan* stipulates car parking standards of 1 space per 1-bed and per 2-bed unit; 2 spaces per 3-bed unit + (depending on design and location). It further states;

“The car parking standards set out for residential land uses in Table 8.2.3 shall be generally regarded as ‘standard’ parking provision. The parking standards in Table 8.2.3 include spaces for both residents and visitors and these car parking spaces shall be clearly designated.”

The standard number of car parking spaces that would be required for the proposed development is 306 no. spaces as per the Dún Laoghaire-Rathdown County Development Plan (DLRCC) 2016 – 2021 Standards;

Table 8.2.3: Residential Land Use - Car Parking Standards	
Land use	Standards
Residential Dwelling	1 space per 1-bed unit and per 2-bed unit 2 spaces per 3-bed unit+ (depending on design and location).
Apartments, Flats, Sheltered housing	1 space per 1-bed unit 1.5 spaces per 2-bed unit 2 spaces per 3-bed unit+ (depending on design and location)

Standard	No. of Units	Total
1 bed per 1 bed unit	76	76
1.5 spaces per 2 bed	145	217.5
2 spaces per 3 bed	6	12
Total Spaces Required	223	305.5

Figure 3.5: Table 8.2.3: Residential Land Use – Car Parking Standards (Source: Pg. 189, Dún Laoghaire Rathdown County Development Plan, 2016-2022. Annotated by TPA, 2020.)

The development proposes 178 no. car parking spaces for 227 no. residential units comprising of 125 no. residential podium car parking spaces, 35 no. residential on-street car parking spaces and 16 no. visitor on-street car parking spaces. In addition to this, the development proposes to supply 2 No. Go Car spaces where each car sharing vehicle that is placed in a community has the potential to replace the journeys of up to 15 private cars. This equates to c. 0.70 spaces per residential unit. This is considered to be appropriate with regard to the location of the site and its proximity to public transport and local amenities. This is in line with Government Guidance regarding reducing dependence on the private motor car and increasing use of public transport/cycling.

While the proposed parking is below the DLR Development Plan requirements, the proposed car parking is in line with National Guidance, in particular sections 4.19, 4.23 and 4.24 of the Sustainable Urban Housing Design Guidelines for New Apartments, 2020 which identifies that for Central and/or Accessible Urban locations *“in large scale and higher density developments, comprising wholly of apartments in more central location that are well served by public transport, the default policy is for car parking provision to be minimized, substantially reduced or wholly eliminated in certain circumstance”*. A Material Contravention Statement by TPA has been submitted with the planning application in this regard.

3.1.17 Bicycle Parking

Dún Laoghaire-Rathdown County Council's *Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)* outlines the bicycle parking for residential developments. In summary, 1 short stay (visitor) parking space per 5 units and 1 long stay parking space per unit is required.

The Dun Laoghaire-Rathdown County Council requires a minimum of 227 long stay and 45 short stay (visitor) cycle parking spaces for this development.

$227/5 = 45.4$ (visitor) $227*1 = 227$ (per residential unit)

Total Required – 272 bicycle parking spaces

It is noted that the 2020 Apartment Guidelines also refer to cycle parking, however, the references are not within a SPPR and remain at the discretion of the Planning Authority.

The apartment guidelines state at Section 4.17;

'Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. 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'

Based on the apartment guidelines the following bicycle parking would be required for the scheme;

Apartment guidelines specify a minimum of 1 bicycle storage space per bedroom and visitor spaces at a rate of 1 space per 2 units. The requirement therefore being:

76 (1 bed) + 290 (2 bed) + 18 (3 bed) + 114 (visitor) = 498 spaces required for the scheme.

No. required for Residential – 384 bicycle parking spaces

No. required for Visitors – $227/2 = 114$

Total Required = 498 bicycle Parking Spaces

519 no. bicycle parking spaces comprising 389 no. residential and 130 no. visitor bicycle parking spaces. This number is in excess of both Development Plan and Apartment Guidelines standards.

In addition, 12 no. Motorbike Parking spaces have been provided for the development.

OMP Architect's *Schedule of Accommodation* illustrates the type of cycle parking throughout the site.

3.1.18 Open Space

Sections 8.2.8.2 and 8.2.8.3 of the Development Plan outline quantitative and qualitative standards for public and communal open space.

For all developments of 5+ units 15 sq.m- 20 sq.m of Open Space per person is to be provided (based on 1.5 persons for 1 and 2 bedroom units, while for 3-bedroom units and larger, the presumed occupancy is 3.5 persons).

Section 8.2.8.2(i) of the *Development Plan* states an absolute minimum of 10% of the overall site area for all residential developments of 5+ units be reserved for use as Public Open and/or Communal Space.

Public Open Space

The Development Plan states that: “‘Public’ open space refers to all areas of open space within a new development (be that public (taken in charge), communal, semi private or otherwise) that is accessible by all residents/ employees of the development and in certain cases may be accessible by the wider general public.”

The proposed 227 no. unit scheme requires between c. 5,422.5 sqm and 7,230 sqm of open space based on a presumed occupancy of 361.5 no. residents ((227 apartments*1.5)+(6 apartments *3.5 persons)), the requirement of 15-20 sq. m per resident).

The proposed development provides for 5,679 sq. m of public open space. This figure equates to 15.71 sq. m of open space per resident– which is within the requirements of 15-20 sq m per resident and required in the *Development Plan*.

The proposed masterplan provides for 31.9% of the overall site area for Public Open Space which is well over 10% of the overall site area requirement in the *Development Plan*.

Communal Open Space

The proposed 227 no. unit scheme requires around 1,779.5 sqm of Communal Open Space as per the 10% requirement.

The proposed development provides for c. 2,176 sq. m of Communal Open space across blocks E, F, G and H. This includes a 198 sq. m Roof level Communal Open space provided within block F. This provision amounts to c. 12.75% of the overall site area which is above the 10% requirement.

In addition to this, a 537.2 sqm residential tenant amenity space has been provided within block G + H.

Private Open Space

The proposed design incorporates a generous amount of private open space provision within each residential unit which are above the stated requirements for private open space provision within the Apartment Guidelines. The *Housing Quality Assessment*, prepared by OMP architects demonstrates compliance with the relevant standards.

All the open spaces will be of high-quality design, will be highly accessible, permeable and safe and will add to the biodiversity of the scheme and the green infrastructure of the wider area. Further details on the provision of open space throughout the proposed development are provided in OMP’s Architects Design Statement/Dermot Foleys Landscape Rationale, dated.

3.1.19 Refuse Storage

Section 8.2.3.2(v) of the *Development Plan* requires that adequate refuse areas are provided. Waste storage areas (WSA) to cater for segregated waste streams are provided within each apartment block where Blocks G and H share the same WSA. Please refer to Section 5 of the accompanying *Operational Waste Management Plan*, prepared by AWN Consulting, for further details.

3.1.20 Development Management Thresholds

Appendix 10 'Development Management Thresholds Information Document' of the *Development Plan* provides a guide for applicants on the documentation generally required for residential and commercial developments of specific sizes.

The enclosed documentation is in accordance with Appendix 10 of the *Development Plan*, providing, *inter alia*, the following documents/assessments:

- *Travel Plan (as part of the Transport Impact Assessment)*
- *Operational Waste Management Plan*
- *Landscape Design Rationale Report*
- *Construction Management Plan*
- *Recycling and Composting (as part of the Operational Waste Management Plan)*
- *Energy Statement (as part of the Sustainability TGDL and NZEB Report)*
- *Stormwater Impact Assessment*
- *Green Roofs*
- *Bin Point*
- *Design Statement*

3.2 Dún Laoghaire-Rathdown Draft County Development Plan 2022-2028

The Dún Laoghaire-Rathdown County Council Draft County Development Plan, 2022-2028 went on public display from 12th January – 16th April 2021. While its content is not strictly applicable to the assessment of the Application, it is considered prudent to highlight how the proposed development might be assessed in the context of the likely content of any future key Development Plan policies for the County. The plan generally follows the Section 28 National Guidance in relation to Development Management Standards, which are all detailed within Chapter 12 of the Draft Plan.

Landuse Zoning

As noted in Section 3.1 of this report, there is no proposed change to the zoning on the 'Knockrabo' lands in the *Draft Development Plan*. The lands are proposed to remain zoned Objective A - 'to protect and-or improve residential amenity.' The reservation line for the Eastern Bypass also remains as per the 2016 -2022 plan.

The proposed development generally complies with the standards and objectives outlined in Chapter 12 as follows;

12.1.1 – Planning Process

- An Architects Design Statement has been submitted with the application
- A Landscape Design Rationale has been submitted with the application
- An EIA Screening has been submitted with the application
- An Appropriate Assessment and Ecological Impact Assessment has been submitted with the application

12.2 – Climate Action

- An Energy Statement has been submitted with the application
- Urban Greening – The development provides for award winning high-quality Landscaping, Green Roofs and SUDS

12.3.1 – Quality Design

- The development complies with all relevant National and Regional policy objectives
- Higher densities have been provided in the proposed development, which will deliver a high quality residential design and amenity with a genuine ‘sense of place’.

12.3.2.2 - Sustainable Neighbourhood Infrastructure - Future Provision

- The scheme provides for Residential Tenant Amenities of 537.2sqm in line with the SNI Objective.

12.3.2.4 - Childcare Facilities

- A Childcare Facility has been approved in Cedar Mount House in Phase of the development of the Knockrabo lands. The Childcare Capacity Report submitted with this application confirms that this will cater for both Phase 1 and Phase 2 lands.

12.3.3 - Quantitative Standards for All Residential Development

- The Development proposed complies with all Section 28 Guidance in relation to Apartment Developments and as outlined in the SPPRS (discussed in Section 2.5 above).

12.3.3.2 - Residential Density

- The Development proposed complies with all Section 28 Guidance National Guidance in relation to appropriate density.

12.3.4.2 - Habitable Rooms

- A Sunlight, Daylight and Overshadowing Report has been submitted with the application which confirms appropriate levels of natural daylight and ventilation across the scheme.

12.3.5 - Apartment Development

- The proposed development complies with the standards set out in the Apartment Guidelines as detailed in this report.

12.4 - Transport

- The application is designed in accordance with DMURS and is accompanied by Quality Audit, Traffic Assessment, Traffic Plans, Street Lighting Plan. Car Parking is discussed on the following page.

▪ **Car Parking**

The Draft Development Plan introduces ‘Car Parking Zones’. The application site falls within Zone 3.

The relevant car parking standards are summarised and set out below:

Residential Unit Type	No. of Car Parking Spaces Required
1 and 2 bed apartments*	1
3 bed apartments*	2
*Plus 1 in 10 visitor parking for apartments in zone 3 required	

Figure 3.6: Summary of car parking standards contained within the Dún Laoghaire Rathdown Draft County Development Plan, 2022-2028.

(iii) Parking Zone 3

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

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

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

From a quantum perspective, this is largely unchanged from the current Development Plan. The main difference would appear to be the introduction for visitor car parking. The proposed development would require 260 car parking spaces for the proposed development.

Section 12.4.5.2 (i) enables a reduced level of car parking as outlined in the Draft Plan in Zone 3 which will be at the discretion of the Planning Authority. The applicant must comply with the Assessment Criteria for deviation from Car Parking Standards, which include the following criteria;

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

- *The provision of bespoke public transport services.*
- *The provision of bespoke mobility interventions.'*

In this regard, as outlined in this Statement of Consistency, the level of car parking proposed is in line with National Policy and has been considered in detail with the provision of cycle parking provision in excess of National and Development Plan Guidance and the provision of parking spaces for car share for the development. This has been detailed in the Travel Plan prepared by Waterman Moylans submitted with the Application.

Overall, it is considered that reduced car parking standards apply to the proposed site due to its site characteristics in close proximity to public transport networks and the promotion of alternative modes of transport and modal shift.

12.4.6 Cycle Parking

- Cycle parking provision has been provided in excess of both Development Plan and Apartment Guidelines standards
- Provision has been made for different types of bicycle parking within the development
- The application is accompanied by a Travel Plan which assesses bicycle parking and modal shift

12.4.7 Motorcycle Parking

- Motorcycle Parking has been provided in line with objective 12.4.7

12.4.9 Design of Underground and Multi Storey Car Parks

- The semi-basement car parks have been designed in accordance with objective 12.4.9

12.4.11 Electric Vehicles

- Ducting has been made available for all parking spaces

12.7 - Green Infrastructure & Biodiversity

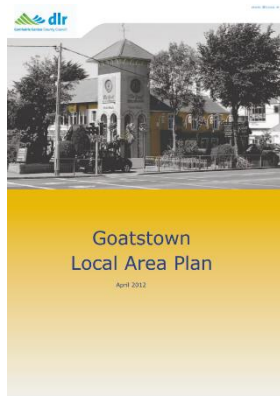
- An ecological impact assessment has been submitted with the application, which includes measures in relation to Invasive Species.

12.7.3 Sensitive Landscapes and Site Features - to be considered in landscape proposals

- The application contains arborist and landscape reports which indicate trees for retention and proposed planting. The proposed development is in accordance with objective 12.7.3

The proposed development complies with the zoning objectives as set out in the 2022-2028 Draft Plan, however, the applicant fully recognises that this Draft Plan is subject to change and that the predominant context for the review of the scheme vis-à-vis the current operational and formally adopted plan, that being the Dun Laoghaire Rathdown County Development Plan 2016-2022.

3.3 Goatstown Local Area Plan 2012



The *Goatstown Local Area Plan* (hereinafter referred to as the *LAP*), which was adopted by the Local Authority in April 2012, is the local area plan for the Goatstown area, which includes the subject site at Knockrabo. The lifetime of the *LAP* was extended by resolution up to April 2022.

The *Dún Laoghaire-Rathdown County Development Plan 2016-2022* states in Section 1.3.4.6 in relation to the Goatstown *LAP*:

'Goatstown

The Goatstown Local Area Plan was adopted in April 2012. The Plan area includes the heavily trafficked intersection at Goatstown and extends to incorporate the predominantly residential areas of Knocknashee, Taney, Larchfield, Hollywood, Farmhill, Willowfield and Goatstown Close. It also includes the neighbourhood centres at Willowfield and Larchfield, Mount Anville School, Taney Hall and potential development lands at Knockrabo. The continuing requirement for a reservation for the Eastern Bypass has effectively sterilised a portion of the Plan lands and has had an overall negative impact on the wider area. Spatially the crossroads is the focal point in the area but it is hampered by traffic volumes and congestion and displays little 'sense of place' although The Goat pub is a significant local landmark.

The LAP sets out a vision for the area to create a distinctive and vibrant urban village. Good principles of urban design, as outlined in the Department of Environment, Heritage and Local Government 'Urban Design Manual' (2009), underpin the Plan's policies and objectives. Of major benefit to the Plan will be the proposed Blueline Bus Rapid Transit Corridor which is proposed to run from St. Vincent's Hospital to Sandyford via University College Dublin and Goatstown. The BRT will utilise part of the road reservation for the Eastern Bypass. Two proposed stops or stations are located in the Plan lands – Mount Anville and Goatstown. The Council is reliant on Central Government and other agencies for the delivery of public transport infrastructure, and it is noted that a commitment is given in the National Transport Authority's 'Greater Dublin Area, Transportation Strategy - 2030 Vision' (2011), to assess this BRT proposal and examine whether it can be integrated into the wider bus priority network.

Individual Site Framework Strategies are included in the LAP for lands at The Goat, the Topaz Garage site, lands at Knockrabo, the former Victor Motors site and the Irish Glass Bottle site.'

It is submitted that the proposed development is consistent with the objectives of the *LAP*, however it is acknowledged that the proposed development materially contravenes the *LAP* in relation to building height. Accordingly, a Material Contravention Statement accompanies the application which provides justification for the contraventions in question.


Section 3.2 of the *LAP* relates to the overall vision of the Plan and states:

"In planning terms, the overall vision for the area is to create a distinctive and vibrant urban village that is an attractive place to live and socialise underpinned

by a high standard of urban design, smarter public transport and a range of community, social and local retail facilities. New development should seek to enhance the local built environment, provide for a greater mix and variety of residential accommodation and, where possible, should be designed to create defined streetscapes and a stronger identity and sense of place.”

The table below gives a summary of how the various relevant Objectives of the Goatstown Local Area Plan have been complied with.

GOATSTOWN LOCAL AREA PLAN	
Objective	Compliance
Development Policy Chapter 3	
3.2.1 Residential Development	
RD1: It is an objective of the Plan that all new residential development within the Plan area shall provide for a mix of household types, sizes and tenures that both complements and enhances the existing residential mix. (Chapter 3.3, page 8)	<p>The plan further states; <i>‘Larger residential developments, which may be possible on the Knockrabo sites, should include a residential mix that can support a variety of households and cater for the needs of different stages of the lifecycle. By providing greater choice, people could, over time, have the opportunity to access suitable accommodation for their changing needs while continuing to live in the area.’</i></p> <p style="text-align: right;">(TPA Emphasis)</p> <p>The proposed development provides 1, 2 and 3-bedroom apartments which complements the existing residential character of the surrounding area, which is primarily comprised of 3-5 bedroom detached and semi-detached houses.</p>
RD2: It is an objective of the Plan that new residential development shall comply with the Guidelines for Sustainable Residential Development in Urban Areas and accompanying Urban Design Manual (May 2009). (Chapter 3.3, page 9)	The design of the proposed development is informed by and adheres to the principles of the Guidelines for Sustainable Residential Development in Urban Areas. Please see OMP’s Architects <i>Design Statement</i> for further details.
3.2.2 Community & Social Infrastructure	
CS2: It is an objective of the Plan that all planning applications for larger residential developments shall be required to provide one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units unless it is satisfactorily demonstrated that there is already adequate childcare provision in the area. (Chapter 3.5, page 10)	<p>A <i>Childcare Capacity Audit</i>, prepared by Tom Phillips + Associates, dated February 2021, concludes that the proposed development will generate demand for a maximum of 70 No. childcare facility spaces.</p> <p>However, from demographic analysis it is observed that much of the demand arising from subject development can be absorbed by the existing childcare network (i.e., 22 No. operational facilities providing more than 1,100 No. childcare places) and a previously permitted (under Reg. Ref. D17A/1124) 400 sq. m childcare facility. This suggests that less than 45 No. places are likely to be utilised at this location.</p> <p>A creche has been approved in Cedar Mount House which will provide for the current development.</p>

<p>CS5: It is an objective of the Plan to facilitate and encourage additional community facilities where it is considered that they will enhance the local area. (Chapter 3.5, page 11)</p>	<p>An internal Residential Tenant Amenities space of 537.2 sqm is proposed for Block G + H to cater to the new residents of the proposed development.</p> <p>Additionally, communal amenity spaces has been provided as follows- Communal Amenity Space provided at Level 00, +01: Block E – 175 sqm Block F – 370 sqm Block G + H – 1,433 sq. m Total – 2,176 sqm</p> <p>Communal Amenity Space provided at Roof Level: Block F – 198 sqm</p> <p>Total Communal Amenity Space provided – 2,176 sqm</p> <p>For further details on the provision of communal and tenant amenity space, refer to the <i>Schedule of Accommodation</i> prepared by OMP Architects.</p>
<p>3.2.3 Open Space & Biodiversity</p>	
<p>OS3: It is an objective of the Plan to protect and enhance biodiversity within the Plan area in accordance with the Green City Guidelines. (Chapter 3.6, page 12)</p>	<p>The plan states on page 12 ; <i>‘Basic habitat assessment to identify biodiversity features should be carried out and used to inform the design and layout of any new medium to high-density developments. New planting schemes should include predominantly native species. Water features that can significantly increase biodiversity value should be considered in the design of new developments where site characteristics / topography allow.’</i></p> <p>In this regard, please refer to the <i>Ecological Impact Assessment</i> prepared by Altemar Marine & Environmental Consultancy in relation to habitats assessment and the corresponding Landscape <i>Design Rationale</i> which outlines the planting scheme which complies with Policy OS3.</p>
<p>OS4: It is an objective of the Plan to protect and preserve mature trees / groupings of trees that add to the character and visual amenities of the area. (Chapter 3.6, page 13)</p>	<p>The plan states on page 13; <i>‘Trees enhance the visual amenities and character of an area. In relative terms the Goatstown area has relatively good mature tree coverage and this helps contribute to the overall appeal of the local environment. There are a number of trees and tree groups within the Plan area, which are specifically identified and protected in the County Development Plan 2010-2016. These trees, in addition to other attractive tree groupings, are identified on Map 2.’</i></p> <div data-bbox="943 1317 1362 1899" style="text-align: right;">  </div> <p>Extract from Map 2 – Indicating Objective ‘To protect and preserve Trees and Woodlands’ on the subject site</p>

	<p>Certain mature trees are proposed to be removed due to poor to fair quality. However, the removal will be replenished by new tree, shrub and hedge planting using a mix of tree species including native species. Please refer to the Arborists Report that specifies recommendations for each of the trees within the development which the Landscape Design is set to comply with.</p>
<p>OS5: It is an objective of the Plan to retain the mature trees located along Mount Anville Road, between Goatstown Crossroads and the entrance to Mount Anville Park. (Chapter 3.6, page 13)</p>	<p>The subject site contains 37 no. mature trees and 2 no. mature hedges which have been classified under Categories ‘U, A, B’ & ‘C’ according to the Arborists report.</p> <p>These trees and hedges spread across the site with a majority of them concentrated within the south eastern portion of the site. Please refer to the drawing titled ‘Landscape Plan – Fi.04-DR-203’ prepared by Dermot Foley Landscape Architects for the location of these trees.</p>
<p>OS7: It is an objective of the Plan that proposals for new development should include measures to retain existing trees and incorporate them into the overall landscaping plan. (Chapter 3.6, page 13)</p>	<p>The plan states on page 13; <i>‘New developments should include proposals to retain existing mature trees where appropriate and provide for planting of new trees. In large residential developments where it is required to provide public open space, existing trees should be incorporated into the overall landscape scheme and used to enhance public open space.’</i></p> <p>The Landscape Rationale report states that <i>“the retention of trees is allied to the proposals for new tree planting which will provide a more diverse age profile across the site and which is in line with good arboricultural, horticultural and ecological practice. Particular attention has been paid to trees located on boundaries with minimal removal of trees at Mount Anville Road.”</i></p> <p>The Arborists’ report confirms that the proposed site layout has been generated in consultation with the projects design team which have worked closely to retain a substantial number of trees and hedges including mature trees and hedges which are in good condition. Engineering requirements for drainage and utilities have also been integrated into the overall site area while being mindful of the required root zones around the trees being retained. Please refer to the Arborists Report for further details regarding mature trees and hedges.</p>
<p>3.2.4 Architectural Heritage and Conservation</p>	
<p>AH1: It is an objective of the Plan to protect the architectural heritage of the area including Protected Structures within the Plan area in accordance with the relevant legislation and best practice procedures. (Chapter 3.7, page 13)</p>	<p>The Conservation report confirms that there will be minimal impact on the Cedar Mount house and further states that the improvements and new uses proposed in the site has retained its lost significance, making it financially viable and a central focus for the Knockrabo Estate.</p>
<p>AH3: It is an objective of the Plan that any proposal for development within the curtilage of a Protected Structure shall be designed to protect the setting and character of the protected</p>	<p>The Plan states on page 14; <i>‘There are number of Protected Structures within the Plan, located on relatively large sites, which may have potential to accommodate additional infill development. Any proposals for infill development within the curtilage of a Protected Structure should be of a high-quality design that respects and complements the setting and character of the Protected Structure. Photomontages which illustrate the relationship</i></p>

<p>structure. (Chapter 3.7, page 14)</p>	<p><i>between the proposed development and the Protected Structure should be included as part of any planning application. With regard to any works along Mount Anville Road including the proposed Quality Bus Corridor, any proposals should seek to retain and (where necessary) minimise any impact on the boundary walls of the Protected Structures located on this corridor including Hollywood House, Cedarmount, The Garth, Theandra and Knockrabo Gate Lodge.'</i></p> <p>The blocks F & G from the current proposal have been arranged on either side of the new avenue proposed. The materials and form of the new structures include flat roofs, brick cladding combined with large glazed openings. The <i>Conservation Report</i> confirms that this layout and form, not only allows for a direct view to the Cedar Mount house from the north but also creates "a visual dialogue between the new and existing structures allowing them to sit comfortably together."</p> <p>Block E which is to act as a new visual landmark will be screened adequately by existing trees in site along with the reinforcement of new planting along the historic eastern boundary of the site.</p> <p>Photomontages have been included as part of the proposed development which illustrate the relationship between Cedar Mount House and Knockrabo Gate Lodge and the proposed development. Please refer to the Photomontages and CGIs report prepared by Model Works for further detail.</p>
<p>3.2.5 Water & Drainage Infrastructure</p>	
<p>WD2: It is an objective of the Plan to ensure that all development proposals incorporate appropriate Sustainable Drainage Systems (SuDS) (Chapter 3.8, page 15)</p>	<p>The Engineering Assessment Report describes how appropriate SUDS systems have been incorporated within the development proposal.</p> <p>In terms of surface water drainage, the development proposes in accordance with the GSDSDS initiative conforming to Best Management Practices for urban storm water drainage, sustainable SUDS strategies such as the use of green roofs, rainwater storage, infiltration techniques, attenuate rainwater in ponds or open water features for gradual release, and by storing in tanks, discharge of rainwater to a watercourse, surface water sewer, or a combined sewer.</p> <p>A detailed maintenance strategy for the systems mentioned above have been specified within the <i>Engineering Assessment Report</i> under Section 5.</p>
<p>WD3: It is an objective of the Plan to augment and rehabilitate the local water distribution network to ensure that existing and future populations shall have an adequate high quality water supply. (Chapter 3.8, page 15)</p>	<p>All watermains will be laid strictly in accordance with the Irish Water requirements for taking in charge. An existing 150mm diameter watermain was installed as part of the phase 1 development along the entrance road to the development site, with a spur left connect and provide for phase 2 of the subject development.</p> <p>The <i>Engineering Assessment Report</i>, provides a <i>Confirmation of Feasibility</i> and an associated <i>Design Acceptance</i> from Irish Water.</p>
<p>WD4: It is an objective of the Plan that where there is potential for flood risk, a flood risk assessment shall be carried out in accordance with the Planning System and Flood</p>	<p>The <i>Flood Risk Assessment</i> report prepared by Moylan identifies various sources of flooding and compares the risk associated with each along with a proposal of mitigation measures. Tidal, Fluvial and Pluvial flooding have been found to range from low to extremely low in most cases. There exists a high risk of flooding from ground water and human/mechanical error sources. However, these can be mitigated by setting appropriate</p>

<p>Risk Management Guidelines for Planning Authorities (DoEHLG & OPW 2009). (Chapter 3.8, page 15)</p>	<p>floor levels, flood routing, damp proof membranes and regular inspection of SW network. The report finally concludes that the site has a low residual risk of flooding from any source.</p>
<p>Urban Design Chapter 4</p>	
<p>3.2.6 Urban Design</p>	
<p>UD1: It is an objective of the Plan that new development within Goatstown shall be of a high quality design and layout that makes a positive contribution to the local built environment and enhances the identity and sense of place of the Plan area and its environs. (Chapter 4.2, page 16)</p>	<p>The proposed development will provide a high-quality public realm and architecture design; and the prioritisation of pedestrian and cyclist movement to ensure the provision of a distinctive and pleasant urban environment for residents and visitors alike. Further details on the positive contribution the proposed design and layout will have on Goatstown and its environs is provided in OMP Architects <i>Design Statement</i>, dated October 2021.</p>
<p>UD2: It is an objective of the Plan that all new residential and mixed-use development shall be designed having regard to the 12 design criteria set out in the Urban Design Manual (DoEHLG May 2009). (Chapter 4.2, page 16)</p>	<p>The proposed development incorporates the 12 design criteria set out in the Urban Design Manual into its design proposals. Please see Section 2.14 of this document and OMP’s <i>Architectural Design Statement</i>, dated October 2021, for further detail.</p>
<p>UD3: It is an objective of the Plan that any planning applications for the redevelopment opportunity sites identified on Map 3 shall include a design statement that sets out the overall design, context and aims of the proposal. (Chapter 4.2, page 17)</p>	<p>The Plan states on page 17; <i>‘It is imperative that the design statements submitted with planning applications on these sites provide a clear rationale for the design concept proposed including the choice of layout, building form, roof shape, height, materials, finishes, façade details and orientation.</i></p> <p><i>The optimum layout of buildings and spaces should be derived from thorough site analysis. The detail gathered in the site analysis should inform the overall design concept and there should be a clear and obvious link between the site characteristics and the eventual design proposed. The layout and orientation of buildings should be guided by the nature of the surrounding development, natural features, accessibility and sunlight patterns.’</i></p> <p>Please refer to OMP’s <i>Architectural Design Statement</i>, dated October 2021, in this regard.</p>
<p>3.2.7 Height</p>	
<p>UD5: It is an objective of the Plan that height in excess of two-storeys shall only be permitted where it is considered by the Planning Authority that the proposed development can be easily absorbed into the existing urban landscape and will not be visually obtrusive or overbearing. Chapter 4.3, page 17)</p>	<p>The plan states on page 17 in relation to height; <i>‘Goatstown’s ability to accommodate increased height is constrained having regard to the almost ubiquitous low-rise residential context of the area. There are nevertheless a limited number of sites with redevelopment potential which may be able to absorb heights of up to three and four storeys. Applications for development, which comprise of heights over two-storeys, should demonstrate that the proposed buildings can be readily absorbed into the existing urban fabric. Generally, the larger a site is, the greater its ability to absorb height. The two separate standalone sites at Knockrabo, for example, are of a size and scale capable of easily accommodating height in excess of two storeys.’</i></p>

	<p>A set of photomontages has been prepared by Model Works in respect of the proposal contained within the <i>Photomontages and CGIs</i> report, which demonstrates its successful integration with the surrounding area. A <i>Landscape Visual Impact Assessment</i> Report has also been provided by Dermot Foley Architects and concludes that the potential impact of the proposed development on streetscapes and landscapes would be minimal.</p>
<p>3.2.8 Density</p>	
<p>UD7: It is an objective of the Plan to promote the efficient use of land by facilitating higher densities within the Plan area in accordance with County Development Plan policy. (Chapter 4.4, page 18)</p>	<p>The proposed development will result in a residential density of c. 157.1 units per hectare. As noted in Section 4.4 of the LAP, higher density “<i>will help strengthen the urban form and enhance the overall vitality of the Plan area.</i>”</p>
<p>3.2.9 Public Realm</p>	
<p>UD8: It is an objective of the Plan to improve the appearance, quality and overall function of the public realm within the Plan area. (Chapter 4.5, page 18)</p>	<p>The plan states on page 18 in relation to Public Realm; <i>‘Public realm is defined as all external spaces that are publicly accessible, including streets, parking areas, footpaths, squares and parks. A high-quality public realm enhances the character of an area and encourages people to use and enjoy public spaces, thereby contributing to the overall vitality and animation of an area.’</i></p> <p>The provision of high-quality landscape architecture is an integral feature of the proposed development. Please refer to DFLA’s <i>Landscape Design Rationale</i>, dated October 2021, for further information.</p>
<p>UD9: It is an objective of the Plan to require applications for multiple residential / mixed-use development to clearly demonstrate the measures proposed to enhance the public realm. (Chapter 4.5, page 19)</p>	<p>Page 19 of the plan states; <i>‘It is important that there is consistency in the selection and use of materials to be employed in any redevelopment proposals in the environs of Goatstown Crossroads. This should include stone paving, street furniture, lighting and signage. Detailed specification of hard and soft landscaping will be required to form an integral part of any application for redevelopment.’</i></p> <p>The Landscape Strategy has been developed and proposed by DFLA in collaboration with OMP Architects and Arborist Associates to ensure best practice for public realm design along with the protection of existing mature trees that contribute to much of the character of the area.</p> <p>The spaces have been designed to make them “<i>visible, identifiable, and easily accessible for residents and the wider community.</i>” Additionally, the development aims to improve permeability throughout the site for pedestrians and cyclists, extend public open space to the north of the site to form continuous parkland, retention of significant boundaries, protected structures and substantial existing walls, facilitation of the future possible taking-in -charge of the public areas of the development by the local authority, substantial and realistic retention of existing trees, and the integration of functional landscape and external works and defensible space.</p> <p>There are a diverse range of open space. Recreational and play facilities provided within the development scheme.</p> <p>The play proposals are based on the Ready steady Play, A National Play Policy. The play areas are proposed to be equipped with play landscape</p>

	<p>with kick-about area, ramps, steps, seating and formal play equipment over an impact absorbing ground surface.</p> <p>There are 2 significant open spaces within the subject development. The open space to the south end of the site is landscaped with significant tree planting and pedestrian and cycle access along with additional opportunities for informal recreation and play.</p> <p>The additional larger open space has been designed with a series of small gardens to ensure adequate setting to the Cedar Mount House. Dense tree planting has been provided to act as an appropriate backdrop for the Cedar Mount House.</p> <p>In terms of integration of functional landscape, the Landscape Strategy outlined by Dermot Foley Architects (DFA) incorporates a full range of functions including circulation, parking, commercial and emergency vehicles, use of no-dig solutions for the protection of trees, the specific and tailored routing of drainage and services in relation to Root Protection Areas (RPA) to provide privacy for residents while also maximising the benefits of a high-quality environment.</p>
Movement Chapter 5	
3.2.10 Street Function	
<p>MT1: It is an objective of the Plan to improve the appearance, quality and overall function of the public realm within the Plan area. It is a further objective of the Plan to continue to work with residents of the Goatstown area to constructively address the issue of traffic ‘rat-running’ through residential areas by means of Traffic Calming Schemes and other measures where appropriate. (Chapter 5.2, page 20)</p>	<p>The Engineering assessment report confirms that the subject development is consistent with the requirements of the design of urban roads and streets as set out in DMURS.</p> <p>The 4 characteristics namely Connectivity, Enclosure, Active Edge, Pedestrian Activities/Facilities along with the 4 core principles of design from the DMURS which are ‘Pedestrian activities/Facilities, Multi-functional Streets, Pedestrian Focus and Multi-disciplinary approach have been incorporated into the proposed development and a scheme has been proposed through the collaboration between OMP Architects, Waterman Moylan consulting Engineers, Tom Phillips & Associates Planning Consultants and Dermot Foley Landscape Architects.</p> <p>Please see Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers for further details on DMURS compliance.</p>
3.2.11 Eastern Bypass	
<p>MT2: It is an objective of the Plan to protect the Eastern Bypass reservation. (Chapter 5.3, page 21)</p>	<p>The plan states on Page 21 in relation to the Eastern Bypass Reservation; <i>‘The reservation for the Dublin Eastern Bypass corridor has been in place for many years and the sterilisation impact of the corridor has significantly restricted the development and hampered the evolution of Goatstown as a distinctive urban village. The Draft ‘2030 Vision’ for the Greater Dublin Area states quite categorically that the Eastern Bypass will not be constructed during the lifetime of the Strategy, but nevertheless, requires the retention of the reservation corridor to facilitate its potential future use for alternative transport initiatives.’</i></p> <p>The reservation and access to the Eastern By-Pass has been retained as part of the proposed development. In this regard, please refer to the accompanying Material Contravention Statement which highlights that the map based local objective has been superseded by a grant of permission across the Knockrabo lands and the pink hatched line indicating the reservation has moved somewhat.</p>

3.2.12 BlueLine - Bus Rapid Transit	
<p>MT3: It is an objective of the Plan to encourage and facilitate the implementation of the BlueLine – Bus Rapid Transit. (Chapter 5.4, page 21)</p>	<p>The Plan on page 21 states; <i>‘The BlueLine is a proposed bus rapid transit service. The nature of BRT means that buses can operate in a more tram- like manner. The BlueLine BRT will run from St. Vincent’s University Hospital (Nutley Lane) to the Sandymount Business Estate via University College Dublin and Goatstown. It is intended that the BlueLine will provide a high quality, high frequency and high capacity public transport service that has the benefits of a fixed-rail tram system with the flexibility of being able to drive on road. The route identified makes use of part of the road reservation for the Dublin Eastern Bypass.</i></p> <p><i>There are a total of 10 stations identified along the proposed route – two of which lie within the Plan area – Mount Anville and Goatstown. A timeframe for the delivery of the proposed service has yet to be determined. The potential of the BlueLine and its integration into the wider bus priority network is to be assessed by the National Transport Authority as part of the overall ‘2030 Vision’ process.’</i></p> <p>The provision of the Blue Line BRT is not included within the final version of the Transport Strategy for the Greater Dublin Area 2016 – 2035.</p> <p>The <i>Traffic and Transport Assessment</i> prepared by Waterman Moylan Consulting Engineers confirms that the Masterplan of the proposed development is designed to provide sufficient flexibility to accommodate potential future pedestrian/cycle connection in a north-south direction through the site and across the reservation of the Dublin Eastern Bypass Corridor (DEBC). This proposed linkage (subject to DLRC and TII objectives) to and from the DEBC could function as a convenient access to and from the BlueLine BRT objective. Furthermore, the proposed scheme does not preclude the future implementation of the Blue Line BRT.</p>
3.2.13 Travel Patterns	
<p>MT4: It is an objective of the Plan to encourage and prioritise sustainable modes of transport including walking, cycling and public transport and reduce reliance on the use of private cars. (Chapter 5.5, page 21)</p>	<p>The Plan states on page 21; <i>‘Goatstown is a small urban centre and as a lower order centre cannot provide for all the services required by the local population. Inevitably there will be a demand for travel outside the Plan area by the local population to access schools, services and employment centres. The challenge is to encourage and facilitate the growth of sustainable modes of travel over the private car.</i></p> <p><i>Generally, the travel to work/school patterns in the Goatstown area broadly reflect those of the overall County with nearly 36.7% opting to use the private car as opposed to 38.3% for the entire County. These figures are much lower than the national average – 57% – this is largely to do with the metropolitan location.</i></p> <p><i>The degree of discrepancy is however, more apparent in other sustainable travel modes – only 8.3% of travel to work/school journeys, for example, are made by bus in the Goatstown area compared to nearly 12% in the County as a whole. Similarly, a significantly higher percentage of people within the Plan area walk to work – 17.2% – compared to only 13.4% in the County as a whole. These differences are most likely to be influenced by Goatstown’s relative proximity to the Luas to Dundrum Town Centre</i></p>

	<p><i>and to University College, Dublin – both of which are significant employment locations.</i></p> <p><i>In conjunction with the NTA, the implementation of the Council's forthcoming 'Countywide Cycle Network', which seeks to provide a coherent and integrated cycle network throughout the County, will further enhance the cycling environment in Goatstown.'</i></p> <p>The accompanying <i>Travel Plan</i> prepared by Waterman Moylan consulting Engineers specifies a detailed approach to addressing the promotion of sustainable modes of transport while reducing car dependency.</p> <p>Mobility management measures such as, the provision of adequate bicycle parking facilities, quality cycle routes, up -to-date information of public transport routes and bus stop locations, information about the bike to work scheme are proposed within the development scheme to encourage residents to use alternate modes of travel.</p>
<p>3.2.14 Permeability</p>	
<p>MT5: It is an objective of the Plan to expand and upgrade pedestrian and cycle path facilities in the Plan area subject to the availability of resources. (Chapter 5.6, page 21)</p>	<p>The subject development proposes to accommodate a high number of cycle parking spaces. A total of 389 No. bicycle parking spaces at a rate of c. 1.70 spaces per unit. A total of 130 visitor bicycle parking spaces are also provided at the rate of 0.55 spaces per units. Therefore, a total of 519 spaces have been proposed which exceeds the requirements stated as per the DLRCC and Apartment Guidelines standards. Please refer to the Engineering Assessment Report prepared by Walter Moylan Consulting Engineers for details on calculations for bicycle parking provisions.</p>
<p>MT6: It is an objective of the Plan to ensure that all new development within the Plan area helps promote an improved permeable urban environment and maximises opportunities to provide direct pedestrian and cycle links both within the Plan area itself and with the immediate environs. A specific objective is to investigate the possibility of improving cycle/pedestrian access from Goatstown to UCD via the Knockrabo sites. (Chapter 5.6, page 22)</p>	<p>The increased provision of cycle parking spaces and reduced number of car parking spaces proposed by this development has been developed with the aim to decrease car dependence and promote the use of cycling as a mode of transport as well as the existing high frequency bus/tram services.</p> <p>The Masterplan of the proposed development is set to accommodate future pedestrian and cycle links along the Dublin Eastern bypass corridor to offer connectivity from the site to the future Blueline BRT service.</p>
<p>3.2.15 Parking</p>	
<p>MT7: It is an objective of the Plan that all new development will provide car parking in accordance with the minimum and maximum standards set out in the County Development Plan. (Chapter 5.7, page 22)</p>	<p>The plan states on page 22; <i>'The provision, or otherwise, of car parking has a significant influence on the choice of travel mode and can also strongly dictate and influence the design and layout of new developments. Research has proven that the provision of readily accessible car parking at obvious destination points such as employment centres actually encourages private car usage. In order to manage car parking, the County Development Plan sets out maximum parking standards for non-residential development and minimum car parking standards for residential schemes.'</i></p>

	<p>A reduced number of car parking spaces up to a maximum of 178 spaces including 16 visitor parking spaces have been provided across the subject application site. The reduced car parking spaces have been justified within the Engineering Assessment Report owing to the site’s proximity to high frequency bus services/tram services, a provision of 519 no. cycle parking facilities, the provision of 2 no. car sharing spaces and the proposal to implement a Travel plan.</p> <p>A Material Contravention Statement has been submitted with the application in relation to the reduction of car parking in contravention with the DLR Development Plan.</p>
<p>MT8: It is an objective of the Plan that new car parking areas shall be considered in terms of their overall contribution to the public realm and shall be constructed using high quality materials. (Chapter 5.7, page 22)</p>	<p>The plan states on page 22; <i>‘The provision of car parking as part of any new development should not dominate or compromise the design or layout. Underground car parking should be provided as part of new developments. Any vents and openings associated with underground car parking should be integrated into the overall landscaping proposals and their visual impact minimised. They should not dominate or detract from public open space and landscaped areas.</i></p> <p><i>Car parking, in terms of overall physical footprint, can very often represent a significant component of the public realm. Surface car parking should be constructed using high quality materials with a view to contributing positively to the public realm. High quality landscaped parking areas can enhance the visual amenities of an area, potentially enable parking areas to be used as hard landscaped urban spaces when not required for their primary purpose and help reduce traffic speeds as drivers respond to the changes in surfacing.’</i></p> <p>Car Parking has been provided both on street, and in podium, enabling open space to be the dominant use.</p>
<p>3.2.16 Cycle Parking</p>	
<p>MT9: It is an objective of the Plan that all new residential and commercial development schemes must include adequate provisions for safe and secure cycle parking facilities at appropriate locations in accordance with County Development Plan standards. (Chapter 5.8, page 22)</p>	<p>Please refer to Section 3.2.14 above for details on the no. of bicycle parking spaces provided.</p>

3.4 Site Framework Strategies

Section 6 of the Local Area Plan identifies a number of specific areas which are considered to be key sites within the Plan area and which may have potential for development/redevelopment. The Site Framework Strategies should not be viewed as the only definitive development solution for the sites in question rather as a set of development principles. Alternative, creative design solutions for the sites, within the parameters outlined in the development guidance, will also be considered. Knockrabo is considered under Section 6.4 (pages 29-30) as outlined below;

'Knockrabo Sites

The lands at Knockrabo, zoned for residential development, comprise of two potential development sites, which are subdivided by the road reservation for the Dublin Eastern Bypass. The area was previously occupied by a Bank of Ireland recreational facility. The site to the north of the reservation requires to be accessed via Heidelberg, Ardilea. The site to the south of the reservation is accessed via Mount Anville Road.

The sites provide an opportunity for high quality residential development within the Plan area. There is a notable level differential across the two sites. Consideration of the difference in levels should inform the design approach to ensure that any new development integrates successfully with the existing built environment.

The lands at Knockrabo include many mature trees and planting. This should be integrated into any redevelopment proposals to help assimilate the development and enhance the character of any new development.'



Photo 27: Knockrabo Sites

In relation to policy on height contained within the Development Guidance, a Material Contravention Statement has been submitted with the application.

Knockrabo Sites - Development Guidance		Compliance
Zoning	<ul style="list-style-type: none"> 'A' - To protect and/or improve residential amenity 	<ul style="list-style-type: none"> The proposed development supports and compliments the existing zoning and Development Plan objectives in the area. The proposed development provides 1, 2 and 3-bedroom apartments which complements the existing residential character of the surrounding area, which is primarily comprised of 3-5 bedroom detached and semi-detached houses. Block E which is a 5-storey including semi-basement podium apartment block which is located closest to the protected structures and has been positioned at a maximum distance of c.46m from Cedar Mount House and c. 14.9m from West Gatelodge and landscaped with appropriate gardens in transition areas to protect amenity.
Height	<ul style="list-style-type: none"> Variation of height Benchmark height of four or five-storeys depending on levels (with possible setback floor or occupied roof space on four-storey buildings) Maximum height of two storeys along boundaries with existing residential properties 	<ul style="list-style-type: none"> The subject scheme design proposes residential blocks with varied heights across the development site, from part two to part eight storeys including semi-basement podium. Please refer to Material Contravention prepared by TPA in this regard
Density	<ul style="list-style-type: none"> In accordance with County Development Plan 	<ul style="list-style-type: none"> The Development Plan states inter alia: <i>"As a general principle, and on the grounds of sustainability, the objective is to optimize the density of development in response to type of site, location and accessibility to public transport."</i> The subject development scheme has good access to high frequency bus/tram services and proposes a density of 157.1 units per hectare within the red line boundary. This is in accordance with the National Planning Framework (Ireland 2040 – Our Plan), which promotes higher residential densities at serviced urban locations and considering the site's context.
Design Objectives	<ul style="list-style-type: none"> Respect the residential amenity of adjoining properties Provide for a mix of residential units that enhances the overall residential mix within the plan area High quality architectural design 	<ul style="list-style-type: none"> Lower building heights are provided near Cedar Mount House and existing residential blocks while the taller buildings are located further north west within the site to protect residential amenity of existing buildings and historic structures. The proposed design scheme provides for a mix of 1 bed, 2 bed and 3 bed apartments in varying sizes in line with relevant design standards. 227 no. residential units in 4 no. separate apartment blocks ranging in height from part 2 – part 8 storeys including podium, comprising of 76 no. 1 bed units, 145 no. 2 bed units and 6 no. 3 bed units.

	<p>that makes a positive contribution towards the local built environment</p> <ul style="list-style-type: none"> • Provide a sensitive response to the streetscape along Mount Anville Road • Protect and provide for the reuse of the existing Gate Lodge, which is a protected structure • Integrate Gate Lodge in any redevelopment proposal • Design to provide for a high standard of residential amenity in terms of orientation, internal layout, private open space and public open space • Address and maximise orientation • Provide measures to mitigate noise impact from any future road / BRT • Consider location and design of ESB substations and bin storage 	<ul style="list-style-type: none"> • The development proposes sensitive design along the Mount Anville Road by ensuring the retention of a maximum number of existing trees for appropriate screening. • A Landscape Visual Impact Assessment Report has prepared by Dermot foley Architects and concludes that the potential impact of the proposed development on streetscapes and landscapes would be minimal. • There are detailed conservation design proposals relating to the Gate lodge which have been specified within the Conservation and Design Proposals Report prepared by Howley Hayes Architects, which conserve and protect the original character of the setting in line with best practice on conservation work. Please refer to the mentioned enclosed document for further details. • 5,679 sq. m public open space has been provided within the scheme, amounting to 31.9% of the overall site area which well above the 10% requirement within the Development Plan. • The internal layout and orientation of have been designed with best practice guidance and achieve a 51.1% dual aspect quality across the proposed blocks, where block E holds 100% dual aspect quality. Please refer to the <i>Housing Quality Assessment</i> and <i>Design Statement</i> prepared by OMP Architects for further details on unit design. • Private Open space has been provided within each residential unit above the required amount. See Housing Quality Assessment prepared by OMP architects for further details. • Waste storage areas (WSA) to cater for segregated waste streams are provided within each apartment block where Blocks G and H share the same WSA. Please refer to Section 5 of the enclosed Operational Waste Management Plan, prepared by AWN Consulting, dated October 2021.
<p>Open Space</p>	<ul style="list-style-type: none"> • Residential units to be provided with adequate high quality useable private open space • Provide high quality useable public open space • Provide a safe suitably located play area for children 	<ul style="list-style-type: none"> • There are a diverse range of open space. Recreational and play facilities provided within the development scheme. • The subject application proposes to include the large public open space to the north of proposed Block F as part of this planning application, as well as an area of public open space around Block E. • The spaces have been designed to make them “<i>visible, identifiable, and easily accessible for residents and the wider community.</i>” • Both areas of open space are contiguous with both existing or permitted public open space, and there will be strong connectivity between proposed and existing/permitted spaces. • The play proposals are based on the Ready steady Play, A National Play Policy. The play areas are proposed to be

		<p>equipped with play landscape with kick-about area, ramps, steps, seating and formal play equipment over an impact absorbing ground surface.</p>
Landscaping	<ul style="list-style-type: none"> • Protect and enhance existing biodiversity - habitat assessment to be carried out • Retain and integrate existing mature trees and planting • Provide a detailed tree survey, landscape plan and planting plan 	<ul style="list-style-type: none"> • The Landscape Strategy has been developed and proposed by DFLA in collaboration with OMP Architects and Arborist Associates to ensure best practice for the protection of existing mature trees that contribute to much of the character of the area. • The proposed development retains a substantial number of trees and hedges including mature trees and hedges which are in good condition. • Particular attention has been paid to minimise removal of trees on the site boundary along Mount Anville Road. • Engineering requirements for drainage and utilities have also been integrated into the overall site area while being mindful of the required root zones around the trees being retained. • A detailed tree survey and landscape plan has been conducted and can be found in the Arborists Report and Landscape Design package enclosed. • New tree planting in line with good arboricultural, horticultural and ecological practice are proposed to provide a more diverse species profile across the development.
Movement	<ul style="list-style-type: none"> • Permeability analysis to be carried out • Provide for direct, safe pedestrian and cycle links • Cycle parking to be provided for residents and visitors • Mixture of underground and surface level car parking • Minimise traffic impacts on the residential amenities of adjoining estates through the promotion of walking/ cycling and traffic calming or other equivalent measures, where appropriate. 	<ul style="list-style-type: none"> • Quality provision of pedestrian and cycle links have been integrated across the subject site through Public Open Spaces which serves each of the proposed residential blocks, along with pedestrian crossing points at appropriate locations. • 519 cycle parking spaces have been provided for residents and visitors across the proposed development site promoting cycling as an alternative form of transport. • A mixture of underground and surface level car parking have been provided. A total of 178 no. car parking spaces is provided, which comprises 125 no. residential podium parking spaces, 35 no. on-street parking spaces, 16 no. visitor/drop off parking and 2 no. car sharing on-street parking spaces. • Based on the Traffic Impact Assessment including a priority junction assessment, confirms that there is sufficient capacity in the surrounding road network to facilitate the proposed Phase 2 development. Please see the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers for further details.

4.0 CONCLUSION

The statement set out herein demonstrates the full compliance of the proposed development with the relevant National, Regional and Local Planning Policy context. At a National and Regional level, this statement has demonstrated the compliance of the development with the appropriate Ministerial Guidance. Furthermore, compliance is demonstrated with the policies and provisions of the current Dun Laoghaire-Rathdown County Development Plan 2016-2022 and the Draft Plan 2022 -2088 which will be adopted in March 2022. Compliance is also demonstrated with the policies of the Goatstown Local Area Plan 2012. These are the key planning policy documents at a local level.

A material contravention statement prepared by TPA Planning Consultants has been submitted as part of this application in relation to car parking, dual aspect, Height and a map based objective for the reservation line of the Eastern Bypass. We would respectfully request that An Bord Pleanála acknowledge and assess the material contravention in relation to the County Development Plan and the Goatstown Local Area Plan.

In conclusion, it is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this substantial residential, serviced zoned site providing for an efficient use of lands, which are highly accessible and well served by public transport. The proposed development is also consistent with the proper planning and sustainable development of the area, and with all relevant National, Regional and Local Planning Policies and Guidelines. The proposed development will be a very attractive place to live on zoned serviced lands, in close proximity to public transport and all of the amenities the local area has to offer.

Yours sincerely



Laura Finn
Associate
Tom Phillips + Associates

APPENDIX A – DETAILS OF PART V (SOCIAL HOUSING)

Knockrabo Investments DAC
32 Molesworth Street
Dublin 2

25th February 2021

Re: Proposed Development at Knockrabo, Phase 2, Mount Anville Road, Dublin 14

Dear Sirs,

I refer to your proposed development at Knockrabo, Phase 2, Mount Anville Road, Dublin 14, involving the construction of 227 residential units and refer particularly to your proposal on site for compliance with the requirements of Part V of the Planning and Development Act, 2000 as amended:

- Build and transfer to the Council, or such Approved Housing Body nominated by the Council, 22 units on-site for social housing, comprising nine (9 no.) one bedroom units, nine (9 no.) two bedroom units and four (4 no.) three bedroom units.

While the overall submission does not meet the current demand, it is noted that the applicant is prepared to make design adjustments to respond to the evolving housing needs. It is acknowledged that the stated costs are *estimated*, as actual costs cannot be quantified at this preliminary stage. As such, I wish to confirm that this proposal is capable of complying with the requirements of Part V of the Planning and Development Act, 2000, as amended, and of the County Development Plan and Housing Strategy.

Furthermore, should planning permission be granted, the Council will explore the feasibility of acquiring units on site with a revision of the Part V proposal following evaluation of costs and land values and a review of current housing demand and determination of funding availability.

It should be noted that acceptance of this proposal in no way contractually binds the Council or its agents to acquire the stated units, or such other units, or to acquire them at the stated prices, which are acknowledged as being indicative only and subject to full review and evaluation should planning permission be granted.

Any proposal for compliance with Part V will be subject to Planning Permission and funding being made available and agreement being reached on land values and construction/development costs.

Yours faithfully,

Aiden Conroy

Administrative Officer

Knockrabo Investments DAC
32 Molesworth Street, Dublin 2

8 February 2021

Subject to Agreement/Without Prejudice

RE: COMPLIANCE WITH S96 (PART V) PLANNING AND DEVELOPMENT ACT, 2000 AS AMENDED (“THE ACT”) APPLICATION BY KNOCKRABO INVESTMENTS DAC FOR PLANNING PERMISSION FOR THE DEVELOPMENT OF 227 RESIDENTIAL UNITS AT KNOCKRABO, MOUNT ANVILLE ROAD, DUBLIN14.

Dear Sir/Madam,

We refer to the above mentioned proposed planning application and set out herewith, pursuant to SI No. 387 of 2015, further details of the proposal to satisfy and comply with the requirements of s. 96 (Part V) of the Act.

Please note that the content of this letter is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application.

Please also note that the information set out herewith is purely for the purposes of facilitating the making of a planning application. The proposed development may ultimately be subject to amendment and further formal agreement with Dun Laoghaire Rathdown County Council prior to submission of the Commencement Notice.

The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015.

We note under the recent Amendment to the Act and its accompanying Regulations that the ultimate agreement with regard to Part V is dependent upon: a) receipt of a final grant of permission; and, b) a site value at the time the Permission is granted. Neither is available at this time.

Preferred Option to Comply with Part V

Without prejudice to the above, it is proposed to provide the equivalent value of 10% of the site in the form of units on site in order to comply with Part V

Estimated Cost to the Local Authority

The overall estimated cost to the Local Authority at this time is €9,712,361 on the basis of the Council acquiring 22 no. units

Identification of Units

In the context of the proposed development of 227 no. residential units at Knockrabo, Mount Anville Road, Dublin 14, it is proposed, without prejudice, to provide 22 no. units on site to comply with Part V of the Act. It is proposed to provide:

- 9 no. 1 bedroom apartments
- 9 no. 2 bedroom apartments
- 4 no 3 bedroom apartments

The above is subject to change depending upon the nature of any final grant of permission, including Conditions of such permission, and the assessment by the Housing Authority of the ultimate proposal.

Methodology of Calculation of Costs

We confirm that the methodology for estimating the costs set out below follows that set out in Table 2 of Circular Letter 10/2015. The table below illustrates the costs for an average 1, 2 and 3 bed units. The breakdown of costs is:-

	1-Bed	2-Bed	3-Bed	Total
Size (Sq Ft)	537	840	1,000	16,393
Construction Cost	185,265	289,800	345,000	5,655,585
Development Cost	69,810	109,200	130,000	2,131,090
Profit	18,527	28,980	34,500	565,559
Land Cost				
Vat @ 13.5%	36,936	57,777	68,783	1,127,552
Total Estimated Cost of Part V Units	310,538	485,757	578,283	9,479,785
No. of Units	9	9	4	22
Subtotal	2,794,839	4,371,816	2,313,130	9,479,785
Total				9,479,785

Finally, we would wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. In addition, the service charge applicable to all apartments within the scheme has yet to be determined and will need to be accounted for prior to finalizing the overall Part V Contribution.

The final details of any agreement with the Council regarding compliance with Part

V, including agreements on costs will not be arrived at until after planning permission has been secured as is provided for under the Planning & Development Act 2000, as amended.

We trust the above is in

order.

Yours faithfully,

KNOCKRABO INVESTMENT DAC